Partners in UK offshore wind

MONA OFFSHORE WIND PROJECT

Mona and Natural Resource Wales (Advisory) Offshore SoCG

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Image of an offshore wind farm

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Prepared by:

RPS

Prepared for:

Mona Offshore Wind Ltd.

Signatories

Signed	[redacted]
Name	Andrea Winterton
Date	14/01/2025
Position	Marine Services Manager
For	Natural Resources Wales Advisory

Signed	[redacted]
Name	Paul Carter
Date	13/01/2025
Position	Mona Consents Lead
For	Mona Offshore Wind Limited

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Glossary

Term	Meaning
Applicant	Mona Offshore Wind Limited.
Development Consent Order (DCO)	An order made under the Planning Act 2008 granting development consent for one or more Nationally Significant Infrastructure Project (NSIP).
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).
Mona Offshore Wind Project	The Mona Offshore Wind Project is comprised of both the generation assets, offshore and onshore transmission assets, and associated activities.
The Planning Inspectorate	The agency responsible for operating the planning process for Nationally Significant Infrastructure Projects.

Acronyms

Acronym	Description
AA	Appropriate Assessment
AEoSI	Adverse Effect on Site Integrity
BDMPS	Biologically Defined Minimum Population Scales
CEA	Cumulative Effects Assessment
CRM	Collision Risk Modelling
DCO	Development Consent Order
EDR	Effective Deterrent Range
EIA	Environmental Impact Assessment
EMP	Environmental Management Plan
EWG	Expert Working Group
ExA	Examining Authority
GEP	Good Ecological Potential
GES	Good Ecological Status
HDD	Horizontal Directional Drilling
HRA	Habitats Regulations Assessment
IEFs	Important Ecological Features
ISAA	Information to Support Appropriate Assessment
JNCC	Joint Nature Conservation Committee
LAT	Lowest Astronomical Tide
LCMS	Landfall Construction Method Statement

Acronym	Description
LSE	Likely Significant Effect
MCZ	Marine Conservation Zones
MHWS	Mean High Water Springs
MLWS	Mean Low Water Springs
MMO	Marine Management Organisation
NRW (A)	Natural Resources Wales Advisory
OCMS	Offshore Construction Method Statement
OSP	Offshore Substation Platforms
PEIR	Preliminary Environmental Information Report
PVA	Population Viability Analysis
RTD	Red-Throated Diver
SAC	Special Areas of Conservation
sCRM	stochastic Collision Risk Model
SLVIA	Seascape, Landscape and Visual Impact Assessment
SNCB	Statutory Nature Conservation Body
SoCG	Statement of Common Ground
SPA	Special Protection Area
SSSI	Site of Special Scientific Interest
UWSMS	Underwater Sound Management Strategy
UXO	Unexploded Ordnance
WFD	Water Framework Directive
ZOI	Zone of Influence

Units

Unit	Description
kV	Kilovolts

1 Statement of Common Ground between Mona Offshore Wind Project and Natural Resources Wales Advisory – Offshore

1.1 Introduction

1.1.1 Overview

1.1.1.1 This Statement of Common Ground (SoCG) has been prepared between Mona Offshore Wind Limited (hereafter referred to as 'the Applicant') and Natural Resources Wales Advisory ('NRW (A)'), together the parties. The SoCG sets out the areas of current agreement and disagreement between the parties in relation to the proposed Development Consent Order (DCO) application for the Mona Offshore Wind Project.

1.1.1.2 The need for a SoCG between the Applicant and NRW (A) is set out in section 1 of Appendix F of the Rule 6 letter issued by the Planning Inspectorate on 07 June 2024.

1.1.1.3 This document is intended to provide the Examining Authority (ExA) with an overview of the level of common ground between the parties. The SoCG identifies where agreement has been reached, where differences remain including the reasons for disagreement, and any outstanding matters. The SoCG also identifies where further discussion between the parties is required post-consent.

1.1.1.4 This SoCG relates to the offshore aspects of the Mona Offshore Wind Project and is one of three SoCGs between the Applicant and NRW (A) which cover the following broad areas of the DCO application:

- Offshore
- Onshore
- Seascape, landscape and visual impact assessment (SLVIA).

1.1.1.5 The three SoCGs should be read in conjunction with one another to clarify the Applicant and NRW (A)'s position on the DCO application as a whole. Topics which are covered in this SoCG are listed in paragraph 1.1.2.7.

1.1.1.6 This version of the SoCG has been updated at Deadline 7 to reflect the latest status of agreement between the parties and supersedes the previous versions submitted at Deadline 1 (REP1-025) and Deadline 6 (REP6-072).

1.1.2 Mona Offshore Wind Project Elements under NRW (A)'s Remit

1.1.2.1 NRW's remit, as set out in its relevant representation (RR-011) is to pursue the sustainable management of natural resources in relation to Wales and applying the principles of sustainable management of natural resources. All elements of the Mona Offshore Wind Project may be relevant to NRW (A) in its function as statutory consultee, covering the offshore, intertidal and onshore works. These are detailed in Schedule 1 (Authorised Project), Part 1 (Authorised Development) of the Draft DCO (C1 F07).

1.1.2.2 In addition to being an interested party under the Planning Act 2008, NRW exercises functions under legislation including (but not limited to) the Environmental Permitting (England and Wales) Regulations 2016 (as amended), Conservation of Habitats and Species Regulations 2017 and the Marine and Coastal Access Act 2009.

1.1.2.3 NRW broadly has two main functions in relation to marine development:

- As a Marine Licencing authority (acting on behalf of the Welsh Ministers)
- As an advisor and statutory consultee.

1.1.2.4 NRW's role as a licensing authority and statutory consultee are independent to ensure appropriate functional separation between them.

1.1.2.5 For the avoidance of doubt, this SoCG relates solely to NRW's advice in its capacity as a statutory consultee and advisor. This SoCG does not include the view of NRW's Marine Licensing Function.

1.1.2.6 This SoCG covers the offshore receptors which have the potential to be impacted by the Mona Offshore Wind Project, seaward of Mean High Water Springs (MHWS), including the intertidal zone. In relation to the DCO regime, NRW (A) has engaged in the pre-application process, both through membership of the Expert Working Group (EWG) meetings via the Evidence Plan process, and through bi-lateral discussions pre- and post-application. Key consultation is presented in Table 1.2 and Table 1.3.

1.1.2.7 This SoCG covers the following offshore technical topics of the Mona Offshore Wind Project DCO application which are of relevance to NRW (A):

- Physical processes (including coastal processes)
- Benthic subtidal and intertidal ecology (including coastal habitats)
- Water Framework Directive – coastal and transitional waters: Offshore
- Fish and shellfish ecology
- Marine mammals
- Offshore ornithology
- Habitats Regulations Assessment (HRA).

1.1.3 Overview of Mona Offshore Wind Project

1.1.3.1 The Applicant has submitted an application for a DCO under the Planning Act 2008 for the construction, operation and maintenance of the Mona Offshore Wind Project, a proposed offshore wind farm located in the east Irish Sea. The Mona Offshore Wind Project will include both offshore and onshore infrastructure and consist of:

- *Mona Array Area:* This is where up to 96 wind turbines with maximum blade tip height above Lowest Astronomical Tide (LAT) of 364 m, up to four Offshore Substation Platforms (OSPs), foundations (for both wind turbines and OSPs), up to 325 km of inter-array cables and up to 50 km of interconnector 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 up to 360 km of offshore export cables will be located and in which the intertidal access areas are located
- *Intertidal access areas:* The area from MHWS to Mean Low Water Springs (MLWS) which will be used for access to the beach and construction related activities
- *Landfall:* This is where the offshore export cables make contact with land and the transitional area where the offshore cabling connects to the onshore cabling

- *Mona Onshore Development Area:* The area in which the landfall, Mona Onshore Cable Corridor (maximum length of up to 15 km), Mona Onshore Substation, mitigation areas, temporary construction infrastructure (such as access roads and construction compounds), operational access to the Mona Onshore Substation and the 400 kV connection to National Grid infrastructure will be located
- *Mona Onshore Substation:* This is where the new substation will be located, containing the components for transforming the power supplied from the offshore wind farm up to 400 kV
- *Mona 400 kV Grid Connection Cable Corridor:* The corridor from the Mona Onshore Substation to the National Grid substation with a maximum length of up to 1 km.

1.1.3.2 A description of the offshore and onshore components required for the construction, operation and maintenance and decommissioning phases of the Mona Offshore Wind Project is available in Environmental Statement Volume 1, Chapter 3: Project description (APP-050).

1.1.4 Approach to SoCG

1.1.4.1 This SoCG has been developed during the DCO pre-examination phase and has been progressed during the Examination phase of the Mona Offshore Wind Project. In accordance with discussions between the parties, the SoCG is focused on those issues raised by NRW (A) within its response to the Scoping Report, Section 42 consultation and as raised through the Evidence Plan Process that has underpinned the pre-application consultation between the parties. This SoCG also includes those issues raised by NRW (A) during the post-application phase (i.e. relevant representations and pre-examination meetings) and also considers the matters raised by the Applicant in response to relevant representations as well as matters raised by both the Applicant and NRW (A) throughout the Examination.

1.1.4.2 In accordance with discussions between the Applicant and NRW (A), the SoCG is focused on the topics listed in paragraph 1.1.2.7.

1.1.4.3 The structure of this SoCG is as follows:

- Section 1.1: Introduction
- Section 1.2: Summary of SoCG
- Section 1.3: Summary of consultation
- Section 1.4: Agreements log

1.2 Summary of SoCG

1.2.1 Overview

1.2.1.1 This SoCG outlines the consultation that has taken place between the parties to date, during the pre-application and post-application phase of the Mona Offshore Wind Project. The agreement logs present the position reached on 14 January 2025 (Deadline 7).

1.2.2 Summary of Those Matters Agreed, Ongoing Points of Discussion and those Matters Not Agreed

1.2.2.1 Table 1.1 provides a summary of those matters agreed, ongoing points of discussion or not agreed between the parties.

Table 1.1: Summary of areas agreed, ongoing points of discussion and not agreed between the parties.

Topic	Agreement status
Physical processes	Some matters agreed, some matters agreed with caveats
Benthic subtidal and intertidal ecology (including coastal habitats)	Some matters agreed, some matters agreed with caveats
Water framework directive – coastal and transitional waters: Offshore	All matters agreed
Fish and shellfish ecology	Some matters not agreed, some matters agreed
Marine mammals	All matters agreed
Offshore ornithology	Some matters agreed, some matters agreed with caveats, some matters not agreed
Habitat Regulations Assessment	Some matters agreed, some matters agreed with caveats

1.3 Summary of consultation

1.3.1.1 Table 1.2 below provides a brief overview of the key consultation undertaken by the Applicant with NRW (A) during the pre-application (both statutory and non-statutory) phases of the Mona Offshore Wind Project.

1.3.1.2 Table 1.3 below provides a summary of the key consultation undertaken by the Applicant with NRW (A) during the *post*-application phases of the Mona Offshore Wind Project. The consultation presented is not exhaustive but provides an indication of aspects of key discussions undertaken. All attendees at the meetings listed in Table 1.2 are provided in the Technical Engagement Plan (APP-041) and Consultation Report (APP-037) however, for the avoidance of doubt, this SoCG is limited to matters between NRW (A) and the Applicant.

1.3.1.3 This SoCG makes reference to other documents submitted with the Mona Offshore Wind Project application that set out, in greater detail, the discussions that have taken place between NRW (A) and the Applicant. These documents are:

- The Technical Engagement Plan (APP-041) and appendices (APP-042, APP-043, APP-044)
- The Consultation Report (APP-037) and appendices (APP-038, APP-039, APP-040)
- NRW's Relevant Representation (RR-011)
- The Applicant's response to NRW's Relevant Representation at the Procedural Deadline (PDA-008 to PDA-019).
- The Applicant and NRW's further submissions into Examination up to and including Deadline 7.

Table 1.2: Summary of key pre-application consultation with NRW.

Date	Form of consultation	Statutory or non-statutory engagement	Summary of consultation
Scoping			
15 June 2022	Scoping Opinion	Statutory	• Issue of Scoping Opinion (APP-194)
Statutory (Section 42) consultation			
04 June 2023	Statutory consultation	Statutory	• Statutory consultation responses from NRW are presented in Consultation Report Appendices – Part 3 (D.25-F) (APP-040).
Evidence Plan steering group			
14 December 2021	Meeting	Non-statutory	• Introduce the cable route selection study • To procure high level feedback on the cable routing process • To identify any concerns.
20 July 2022	Meeting	Non-statutory	• Approach to cable route selection • Likely Significant Effect (LSE) screening methodology • Opportunities to discuss points from the Scoping Opinion.
14 February 2023	Meeting	Non-statutory	• HRA Stage 1 Screening and Information to Support Appropriate Assessment (ISAA) methodology • Consultation on the Preliminary Environmental Information Report (PEIR) and building towards the SoCGs • Cable route site selection study updates • Engineering considerations towards Special Areas of Conservation (SACs).
29 June 2023	Meeting	Non-statutory	• HRA Stage 1 Screening and ISAA methodology • Section 42 responses • Agreement logs.
17 October 2023	Meeting	Non-statutory	• HRA Stage 1 Screening and ISAA methodology • Underwater Sound Management Strategy (UWSMS) • Agreement logs.
Evidence Plan benthic ecology, fish and shellfish ecology and physical processes EWG			
01 April 2022	Email	Non-statutory	• Provision of the benthic survey scope of works.
21 April 2022	Email	Non-statutory	• Provisions of NRW (A) comments on the benthic survey scope of works
29 November 2022	Meeting	Non-statutory	• Key project updates • Baseline characterisation and modelling approach • Initial outputs of impact assessment.

Date	Form of consultation	Statutory or non-statutory engagement	Summary of consultation
14 March 2023	Meeting	Non-statutory	• Baseline characterisation and initial outputs of impact assessment • Cumulative assessment approach and initial impact assessment approach to agreement.
11 July 2023	Meeting	Non-statutory	• Discussion of statutory consultation responses • Updated baselines • Agreement logs.
14 August 2023	Email	Non-statutory	• Provision of a technical note presenting the approach to physical processes modelling for the application.
21 August 2023	Email	Non-statutory	• Provision of NRW (A)'s comments on the approach to physical processes modelling for the application.
12 October 2023	Meeting	Non-statutory	• To present the updates to the benthic ecology baseline characterisation to address statutory consultation responses. Physical processes and fish and shellfish ecology were not discussed.
07 December 2023	Meeting	Non-statutory	• Presentation of the final impact assessment, mitigation measures and progress to agreement.
Evidence Plan marine mammal EWG			
19 July 2022	Meeting	Non-statutory	• Agree the marine mammal study areas • Approach to baseline characterisation • Approach to the Environmental Impact Assessment (EIA), including impact scoping.
17 November 2022	Meeting	Non-statutory	• Baseline characterisation • Approach to the underwater sound assessment and population modelling approach.
09 February 2023	Meeting	Non-statutory	• Updated baseline characterisation • Underwater sound modelling outputs • Cumulative assessment.
26 June 2023	Meeting	Non-statutory	• To present the updated assessment and to discuss statutory consultation responses.
03 August 2023	Meeting	Non-statutory	• To present the updated assessment and to discuss statutory consultation responses.
10 October 2023	Email	Non-statutory	• Provision of technical note with approach to addressing outstanding items for agreement.
26 October 2023	Email	Non-statutory	• Provision of NRW (A)'s comments on approach to addressing outstanding items for agreement
05 December 2023	Meeting	Non-statutory	• Final impact assessment • Final mitigation and monitoring requirements • Progress to agreement.

Date	Form of consultation	Statutory or non-statutory engagement	Summary of consultation
Evidence Plan offshore ornithology EWG			
27 May 2022	Email	Non-statutory	• Provision of technical notes outlining the Applicants approach to the offshore ornithology baseline characterisation, displacement and Collision Risk Modelling (CRM) technical reports.
08 June 2022	Email	Non-statutory	• Provision of NRW (A)'s comments on the baseline characterisation technical note
07 July 2022	Email	Non-statutory	• Provision of NRW (A)'s comments on the displacement and CRM technical notes
13 July 2022	Meeting	Non-statutory	• Agree the approach to baseline characterisation, cumulative study area to agree the approach to EIA, including impact scoping • Presentation of the interim baseline characterisation and discuss and agree the approach to data analyses, including relevant modelling techniques and parameters.
30 November 2022	Meeting	Non-statutory	• To agree key receptor species and to present the interim assessment of impacts • Relevant regional populations and protected sites/qualifying interests for assessment • Approach to HRA Stage 1 screening.
23 February 2023	Meeting	Non-statutory	• To agree key receptor species and to present the interim assessment of impacts • Relevant regional populations and protected sites/qualifying interests for assessment and approach to HRA Stage 1 screening • Discuss and agree scope of cumulative impact assessment and transboundary considerations • To discuss and agree population assessment approaches and thresholds for LSE and integrity.
05 May 2023	Email	Non-statutory	• Provision of the updated methodology for offshore ornithology HRA Stage 1 screening and the ISAA.
29 June 2023	Email	Non-statutory	• Provision of NRW (A)'s comments on the updated methodology for offshore ornithology HRA Stage 1 screening and the ISAA.
30 June 2023	Meeting	Non-statutory	• Update to baseline characterisation for complete baseline data set • Amendments to previously agreed approaches • Statutory consultation responses.
10 July 2023	Email	Non-statutory	• Provision of the technical note presenting the power analysis undertaken at the request of the EWG.
19 July 2023	Email	Non-statutory	• Provision of NRW (A)'s comments on the power analysis undertaken at the request of the EWG.

Date	Form of consultation	Statutory or non-statutory engagement	Summary of consultation
19 October 2023	Meeting	Non-statutory	• Presentation of updated baseline characterisation • Impact assessment for the Environmental Statement.
09 November 2023	Email	Non-statutory	• Provision of the technical note outlining the Applicant's position regarding using species specific avoidance rates from Ozsanlav-Harris et al. (2023) • Provision of the technical note outlining the final updated methodology for offshore ornithology HRA Stage 1 screening and the ISAA.
24 November 2023	Email	Non-statutory	• NRW (A)'s comments on the Applicant's position regarding using species specific avoidance rates and updated methodology for offshore ornithology HRA Stage 1 screening and the ISAA.
29 November 2023	Email	Non-statutory	• Provision of the technical note outlining the Applicants position regarding calculating the regional breeding population.
08 December 2023	Meeting	Non-statutory	• Presentation of final impact assessment • Comments on draft Environmental Statement • Final mitigation and monitoring requirements.

Table 1.3: Summary of post-application consultation with NRW.

Date	Form of consultation	Statutory or non-statutory engagement	Summary of consultation
23 April 2024	Meeting (Marine mammal EWG07)	Non-statutory	• Initial feedback on the outline Underwater Sound Management Strategy (APP-202)
05 July 2024	Meeting	Non-statutory	• Review of this initial statement of common ground
02 August 2024	Meeting	Non-statutory	• Second review of initial statement of common ground prior to submission at Deadline 1
21 August 2024	Meeting	Non-statutory	• Meeting to discuss the Rule 17 letter published on 16 August 2024 which covered offshore ornithology
29 August 2024	Meeting	Non-statutory	• Meeting to discuss the offshore ornithology gap-filling analysis
18 October 2024	Meeting	Non-statutory	• Meeting to discuss NRW comments on the Pen y Gogarth / Great Orme's Head SSSI
29 October 2024	Meeting	Non-statutory	• Meeting to discuss outstanding items under discussion for offshore ornithology

Date	Form of consultation	Statutory or non-statutory engagement	Summary of consultation
08 November 2024	Meeting	Non-statutory	• Meeting to discuss outstanding items under discussion for marine mammals and fish and shellfish ecology
25 November 2024	Meeting	Non-statutory	• Further meeting to discuss outstanding items under discussion for offshore ornithology
26 November 2024	Meeting	Non-statutory	• Meeting to discuss outstanding items under discussion for marine mammals and fish and shellfish ecology
16 December 2024	Meeting	Non-statutory	• Meeting to discuss the in-combination assessment for northern gannet at Grassholm SPA.
07 January 2025	Meeting	Non-statutory	• Meeting to discuss the final SoCG

1.4 Agreement log

1.4.1.1 This section of the SoCG sets out the level of agreement between the parties. For each matter the status is identified as being either agreed, not agreed - material impact, not agreed but no material impact or an ongoing point of discussion, according to the criteria set out in Table 1.4 below.

Table 1.4: Position definitions and colour coding.

Position and colour coding	Definition of position
Agreed	The matter is considered to be agreed between the parties.
Ongoing point of discussion	The matter is neither 'agreed' or 'not agreed' and is a matter where further discussion is required between the parties. For example, where additional clarification is being sought from either party, or where relevant information is being prepared / reviewed.
Not agreed – no material impact	The matter is not considered to be agreed between the parties but is not deemed material. For example, the matter is not agreed however, the outcome of the approach taken by either party does not result in a material impact on the assessment or assessment conclusions in either EIA or HRA terms.
Not agreed – material impact	The matter is not considered to be agreed between the parties. The outcome of the approach taken by either party is considered to result in a materially different outcome on the assessment conclusions.

1.4.1.2 Table 1.5 to Table 1.11 set out the level of agreement between the parties for each relevant component of the application (as identified in section 1.1.2). Table 1.5 to Table 1.10 relate to levels of agreement pertaining to the EIA and the DCO. Table 1.11 relates to levels of agreement with respect to the HRA.

1.4.2 Physical processes (including coastal processes)

Table 1.5: Agreement Log between the parties on physical processes.

Reference Number	Discussion point	Applicant's Position	NRW (A)'s Position	Status
EIA				
NRW.PP.1	Consultation	The Applicant has undertaken adequate consultation with NRW (A) on potential impacts on physical processes. The Applicant has responded to NRW (A)'s concerns raised during Examination including in relation to the location of cable protection in the nearshore zone, with the most recent response provided in REP3-090.103 of the Applicant's Response to NRW Deadline 3 Submission (REP4-047). As per the Marine Licence Principles Document (REP5-022) and the Mitigation and Monitoring Schedule (REP6-026), in the event any cable protection exceeds 5% of navigable depth referenced to Chart Datum in the shallow nearshore area, NRW (A) will also be a named consultee with regards to agreeing a suitable alternative position.	As advised in REP3-090 (para 102), NRW (A) welcomes the intention of the Applicant to try and avoid cable protection in shallow water. We advised that providing the proposed mitigation measure is strictly adhered to - i.e. no more than a 5% reduction in water depth at any point where cable protection is placed - we would be satisfied that there should be no significant impacts to the physical processes in the shallow nearshore environment. We further advised that should the 5% threshold be breached, then we would require the Applicant to conduct a further physical processes assessment in the shallow nearshore environment. Following review of REP4-047 (paragraph REP3-090.103-105) and as advised in our Deadline 5 submissions (REP5-098; paragraph 72), we are pleased to note the Applicant's expectation that a condition will be imposed within the standalone NRW Marine Licence securing the commitment to 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. NRW (A) further welcome that where that restriction is anticipated to be exceeded, the Applicant will consult with NRW (A) in respect of agreeing an alternative position. This discussion will involve consideration of whether further physical processes assessment in the shallow nearshore area would be required, and if so on what terms that assessment would be undertaken. NRW (A) requested in REP5-098 that this commitment is secured appropriately. Subject to these commitments being adhered to, then we can agree that this matter is closed out.	Agreed with caveats

Reference Number	Discussion point	Applicant's Position	NRW (A)'s Position	Status
NRW.PP.2	Consultation	The EIA has had due regard to matters raised by NRW (A) through statutory and non-statutory consultation on potential impacts on physical processes.	See Response to NRW.PP1.	Agreed with caveats
NRW.PP.3	Policy and planning	The Application has identified and considered the plans and policies relevant to physical processes, within NRW (A)'s remit.	NRW (A) agrees that the Applicant has identified and considered the plans and policies relevant to physical processes within NRW (A)'s remit.	Agreed
NRW.PP.4	Baseline environment	The Applicant has adequately characterised the baseline environment for physical processes.	NRW (A) agrees that the baseline description of physical processes through the desktop review of existing literature and existing data sources, project specific surveys and numerical modelling baseline scenarios are sufficient to appropriately characterise the study area (Array Area as it relates to potential impacts in Welsh waters, Export Cable Corridor).	Agreed
NRW.PP.5	Scoping	Agreement to the scoping of impacts for the EIA for physical processes.	NRW (A) agrees with the impacts scoped into the EIA from a physical processes perspective.	Agreed
NRW.PP.6	Study area	The EIA study area is appropriate for the receptors, sites and impacts assessed.	NRW (A) agrees that the EIA study area is appropriate for the receptors, sites and impacts assessed in relation to physical processes.	Agreed
NRW.PP.7	Project design envelope	The EIA chapter has identified, described and assessed the maximum design scenario for the EIA.	See Response to NRW.PP.1.	Agreed with caveats
NRW.PP.8	Assessment methodology	The sensitivity of physical processes receptors has been correctly identified and sufficiently described within the EIA.	NRW (A) agrees that the sensitivity of physical processes receptors have been correctly identified and sufficiently described in EIA.	Agreed

Reference Number	Discussion point	Applicant's Position	NRW (A)'s Position	Status
NRW.PP.9	Assessment methodology	The physical processes modelling is appropriate for predicting impacts on physical processes receptors.	NRW (A) agrees with the numerical modelling approach and scenarios conducted in relation to hydrodynamics, waves and sediment transport to inform the potential changes on Constable Bank, Menai Strait and Conwy SAC and the adjacent coast arising from the construction, operation and decommissioning of the Mona Offshore Wind Project.	Agreed
NRW.PP.10	Assessment methodology	Agreement that the physical processes modelling strategy for the Environmental Statement is appropriate.	NRW (A) agrees – there is no issue with using existing PEIR study as supporting evidence for the Environmental Statement.	Agreed
NRW.PP.11	Assessment methodology	The list of projects screened into the Cumulative Effects Assessment (CEA) in the EIA is appropriate.	NRW (A) agrees that the list of projects screened into the CEA in the EIA is appropriate.	Agreed
NRW.PP.12	Assessment of the effects from the Mona Offshore Wind Project alone	There will be no significant effects on physical processes in EIA terms for the Mona Offshore Wind Project alone.	See Response to NRW.PP.1.	Agreed with caveats
NRW.PP.13	Assessment of the effects from the Mona Offshore Wind Project cumulatively with other projects	There will be no significant effects on physical processes in EIA terms for the Mona Offshore Wind Project cumulatively with other plans and projects.	NRW (A) agrees that there will be no significant effects on physical processes in EIA terms for the Mona Offshore Wind Project cumulatively with other plans and projects.	Agreed
NRW.PP.14	Mitigation and monitoring	The mitigation measures and conditions outlined in Volume 2, Chapter 1: Physical processes (APP-053) and the Mitigation and Monitoring schedule (REP6-026) are appropriate and will ensure significant effects are avoided. The Applicant has responded to NRW (A) concerns regarding the location of cable protection in the nearshore zone in the Applicant's Response to NRW Deadline 3 Submission (REP4-047) and also its Response to NRW's Deadline 4 Submission (REP5-061) and Deadline 5 submission (REP6-096).	Please see response to NRW.PP.1 and NRW.PP.15.	Agreed with caveats

Reference Number	Discussion point	Applicant's Position	NRW (A)'s Position	Status
		As per the Marine Licence Principles Document (REP5-022) and the Mitigation and Monitoring Schedule (REP6-026), in the event any cable protection exceeds 5% of navigable depth referenced to Chart Datum in the shallow nearshore area, NRW (A) will also be a named consultee with regards to agreeing a suitable alternative position. As per REP3-090.116 of the Applicants Response to NRW Deadline 3 Submission (REP4-047), NRW (A) will be a consultee on the relevant plans through the draft DCO (C1 F07) where the DCO requires the Applicant to submit the plan to NRW for approval in writing prior to commencement of construction of the authorised scheme.		
Draft DCO				
NRW.PP.15	Monitoring requirements/ conditions	The mitigation and monitoring outlined in Volume 2, Chapter 1: Physical processes (APP-053) and the Mitigation and Monitoring schedule (REP6-026) are suitable for the purposes of the DCO application. The Applicant has responded to NRW (A) concerns regarding the location of cable protection in the nearshore zone in the Applicant's Response to NRW Deadline 3 Submission (REP4-047) and also its Response to NRW's Deadline 4 Submission (REP5-061) and Deadline 5 submission (REP6-096). As per the Marine Licence Principles Document (REP5-022) and the Mitigation and Monitoring Schedule (REP6-026), in the event any cable protection exceeds 5% of navigable depth referenced to Chart Datum in the shallow nearshore area, NRW (A) will also be a named consultee with regards to agreeing a suitable alternative position. As per REP3-090.116 of the Applicant's Response to NRW Deadline 3 Submission (REP4-047), NRW (A) will be a consultee on the relevant plans through the draft DCO (C1 F07) where the DCO requires the Applicant to submit the plan to NRW for approval in writing prior to commencement of construction of the authorised scheme.	Subject to the resolution of matters relating to the assessment of cable protection at the nearshore zone (e.g. NRW.PP.1) and to the commitment that no cable protection will be placed on Constable Bank, that no cable protection higher than 70 cm will be installed within Menai Strait and Conwy Bank SAC and that cable protection will be up to 10 m wide, kept low profile, and will be no more than 5% reduction water depth, then NRW (A) agrees that the mitigation and monitoring outlined in Volume 2, Chapter 1: Physical processes (APP-053) and the Mitigation and Monitoring schedule (REP6-026) are suitable for the purposes of the DCO. NRW (A) will need to be consulted on the relevant plans (OCMS and LCMS) – see Marine Licence Principles Document (REP5-022) As per Paragraph 76 of our Deadline 5 submission (REP5-098); 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 writing, in agreeing an alternative position. As noted by the Applicant in REP4-047 at REP3-090.103-105 *"…this discussion will involve consideration of whether*	Agreed with caveats

Reference Number	Discussion point	Applicant's Position	NRW (A)'s Position	Status
			further physical processes assessment in the shallow nearshore area would be required, and if so on what terms that assessment would be undertaken". NRW (A) have requested that this commitment is clearly worded and secured in the stand-alone Marine Licence and secured in the Mitigation and Monitoring Schedule (REP4-013) and Marine Licence Principles Document (REP4-011) and this needs to be agreed in writing with NRW. Subject to these commitments being adhered to, then we can agree that this matter is closed out.	

1.4.3 Benthic subtidal and intertidal ecology (including coastal habitats)

Table 1.6: Agreement Log between the parties on benthic subtidal and intertidal ecology.

Reference Number	Discussion point	Applicant's Position	NRW (A)'s Position	Status
EIA				
NRW.BE.1	Consultation	The Applicant has undertaken adequate consultation with NRW (A) on potential impacts on benthic subtidal and intertidal ecology. The Applicant confirmed in REP1-056.190 of the Applicant's response to NRW (A)'s written representations (REP2-080) that the associated impacts to benthic receptors are assessed in section 2.9.5 of Volume 2, Chapter 2: Benthic subtidal and intertidal ecology (APP-054) for long term habitat loss and section 2.9.9 of Volume 2, Chapter 2: Benthic subtidal and intertidal ecology (APP-054) for changes in physical processes.	Please see response to NRW.PP.1.	Agreed with caveats
NRW.BE.2	Consultation	The EIA has had due regard to matters raised by NRW (A) through statutory and non-statutory consultation on potential impacts on benthic subtidal and intertidal ecology.	Please see response to NRW.PP.1.	Agreed with caveats
NRW.BE.3	Policy and planning	The Application has identified and considered the plans and policies relevant to benthic subtidal and intertidal ecology, within NRW (A)'s remit.	NRW (A) agrees that the Applicant has identified and considered the plans and policies relevant to benthic ecology within NRW (A)'s remit.	Agreed
NRW.BE.4	Surveys	A broad approach to benthic ecology site-specific surveys has been adopted.	NRW (A) agrees on the broad approach to characterisation for Benthic Ecology in particular now that the Zone of Influence has been sampled.	Agreed

Reference Number	Discussion point	Applicant's Position	NRW (A)'s Position	Status
NRW.BE.5	Baseline environment	Sufficient site-specific and desktop data has been collated to appropriately characterise the baseline benthic subtidal and intertidal ecology environment to inform the EIA.	NRW (A) agrees sufficient site-specific and desktop data has been collated to inform the EIA. NRW (A) agrees that the data collected through the site-specific surveys and through the desktop review of existing literature and data sources is sufficient to appropriately characterise the benthic ecology in the export cable corridor.	Agreed
NRW.BE.6	Baseline environment	Agreement on the baseline characterisation for benthic subtidal and intertidal ecology.	NRW (A) agrees on the broad approach to characterisation for Benthic Ecology in particular now that the Zone of Influence has been sampled. NRW (A) agrees with the identification of benthic subtidal and intertidal ecology Important Ecological Features (IEFs).	Agreed
NRW.BE.7	Scoping	Agreement to the scoping of impacts for the EIA for benthic subtidal and intertidal ecology.	NRW (A) agrees with the scoping of impacts for the EIA and HRA for Benthic Subtidal and Intertidal Ecology.	Agreed
NRW.BE.17	Scoping	Agreement on the scoping of impacts for the EIA for marine sediment quality.	NRW (A) agrees with the scoping of impacts for the EIA for marine sediment quality.	Agreed
NRW.BE.8	Study area	The EIA study area is appropriate for the receptors and impacts assessed.	NRW (A) agrees with the regional benthic subtidal and intertidal area defined in the PEIR.	Agreed
NRW.BE.9	Project design envelope	The EIA chapter has identified, described and assessed the maximum design scenario for the EIA.	Please see response to NRW.PP.1.	Agreed with caveats
NRW.BE.10	Assessment methodology	The sensitivity of benthic subtidal and intertidal ecology receptors has been correctly identified and sufficiently described within the EIA.	NRW (A) agrees that the sensitivity of benthic subtidal and intertidal ecology receptors has been correctly identified and sufficiently described within the EIA.	Agreed
NRW.BE.11	Assessment methodology	The list of projects screened into the CEA in the EIA is appropriate.	NRW (A) agrees that the list of projects screened into the CEA in the EIA is appropriate.	Agreed

Reference Number	Discussion point	Applicant's Position	NRW (A)'s Position	Status
NRW.BE.12	Assessment of the effects from the Mona Offshore Wind Project alone	On the basis that there is no direct overlap with features of Marine Conservation Zones (MCZs), there will be no risk of hindering conservation objectives of any MCZs with benthic subtidal features.	NRW (A) agrees that as there is no direct overlap with features of MCZs, there will be no risk of hindering conservation objectives of any MCZs with benthic subtidal features.	Agreed
NRW.BE.13	Assessment of the effects from the Mona Offshore Wind Project alone	There will be no significant effects on benthic subtidal and intertidal ecology in EIA terms for the Mona Offshore Wind Project alone.	Please see response to NRW.PP.1.	Agreed with caveats
NRW.BE.14	Assessment of the effects from the Mona Offshore Wind Project cumulatively with other projects	There will be no significant effects on benthic subtidal and intertidal ecology in EIA terms for the Mona Offshore Wind Project cumulatively with other plans and projects.	NRW (A) agrees that there will be no significant effects on benthic ecology in EIA terms for the Mona OWF Project cumulatively with other plans and projects.	Agreed
NRW.BE.18	Assessment of the effects from the Mona Offshore Wind Project alone	There will be no significant effects on marine sediment quality in EIA terms for the Mona Offshore Wind Project alone.	As confirmed at Deadline 4 (REP4-105])] NRW (A) agrees that there will be no significant effects (in EIA terms) on marine sediment quality for the Mona Offshore Wind Project alone.	Agreed
NRW.BE.19	Assessment of the effects from the Mona Offshore Wind Project cumulatively with other projects	There will be no significant effects on marine sediment quality in EIA terms for the Mona Offshore Wind Project cumulatively with other plans and projects.	As confirmed at Deadline 4 (REP4-105) NRW (A) agrees that there will be no significant effects (in EIA terms) on marine sediment quality for the Mona Offshore Wind Project alone.	Agreed
NRW.BE.15	Mitigation and monitoring	The mitigation measures and conditions outlined in Volume 2, Chapter 2: Benthic subtidal and intertidal ecology (APP-054) and the Mitigation and Monitoring schedule (REP6-026) are appropriate and will ensure significant effects are avoided.	Please see response to NRW.PP.15.	Agreed with caveats

Reference Number	Discussion point	Applicant's Position	NRW (A)'s Position	Status
Draft DCO				
NRW.BE.16	Monitoring requirements/ conditions	The mitigation and monitoring outlined in Volume 2, Chapter 2: Benthic subtidal and intertidal ecology (APP-054) and the Mitigation and Monitoring schedule (REP6-026) are suitable for the purposes of the DCO application.	Please see response to NRW.BE.15.	Agreed with caveats

1.4.4 Water framework directive - coastal and transitional waters

Table 1.7: Agreement Log between the parties on Water Framework Directive - coastal and transitional waters.

Reference Number	Discussion point	Applicant's Position	NRW (A)'s Position	Status
Water Framework Directive Coastal Waters Assessment				
NRW.WFDC.1	Policy and planning	The Water Framework Directive (WFD) Regulations Coastal and Transitional Waters assessment (APP-088) has identified all appropriate legislation, policy and guidance relevant to the WFD Regulations.	NRW (A) agrees that the project has been adequately assessed as compliant with The Water Environment (Water Framework Directive) (England and Wales) Regulations 2017.	Agreed
NRW.WFDC.2	Assessment methodology	The methodology applied to undertake the WFD Coastal and Transitional Waters assessment is appropriate.	NRW (A) agrees that the assessment out to 12 nm of the impact of chemical contamination mobilisation shows no likely deterioration of WFD waterbodies as a result of the activities associated with the Mona offshore wind project and confirm that the methodology used for assessment of WFD TraC waterbodies is appropriate.	Agreed
NRW.WFDC.3	Assessment methodology	The WFD Coastal and transitional Waters assessment has identified the appropriate water bodies.	NRW (A) agrees that the WFD Coastal and Transitional waters assessment has identified the appropriate water bodies.	Agreed
NRW.WFDC.4	Assessment methodology	The WFD Coastal and transitional Waters assessment has accurately scoped the elements of each identified water body.	NRW (A) agrees that the assessment has accurately scoped the elements of each identified water body.	Agreed
NRW.WFDC.5	Outcome of the WFD coastal and transitional waters assessment	There will be no significant effects (Biology – habitats, Water quality, Protected areas) on the identified water bodies and the ability of these water bodies to achieve good status in the future. The construction, operations and maintenance and decommissioning of the Mona Offshore Wind Project export cables is therefore considered to comply with the requirements of the WFD.	NRW (A) supports the assessment conclusion in Volume 6, Annex 2.2: Water Framework Directive Coastal Waters Assessment (APP-088) that the proposed works will not cause deterioration to the water quality of either of the water bodies considered (North Wales coastal waterbody and Clwyd transitional waterbody), nor the individual elements of these water bodies, or impact the objectives of achieving Good Ecological Potential (GEP) and Good Ecological Status (GES).	Agreed

1.4.5 Fish and shellfish ecology

Table 1.8: Agreement Log between the parties on fish and shellfish ecology.

Reference Number	Discussion point	Applicant's Position	NRW (A)'s Position	Status
EIA				
NRW.FSF.1	Consultation	The Applicant has undertaken adequate consultation with NRW (A) on potential impacts on fish and shellfish ecology.	NRW (A) agrees that adequate consultation has been made by the Applicant.	Agree
NRW.FSF.2	Consultation	The EIA has had due regard to matters raised by NRW (A) through statutory and non-statutory consultation on potential impacts on fish and shellfish ecology.	NRW (A) agrees that the EIA has had due regard to potential impacts on fish and shellfish ecology. NRW (A) continue to disagree with the Applicant on the impacts to spawning cod from the development alone (see NRW.FSF.16), but we are content that measures included within the updated Outline UWSMS (REP5-028) are now likely sufficient to mitigate these.	Agreed
NRW.FSF.3	Policy and planning	The Application has identified and considered the plans and policies relevant to fish and shellfish ecology, within NRW (A)'s remit.	NRW (A) agrees that relevant plans and policies have been considered and identified.	Agreed
NRW.FSF.4	Baseline environment	Agreement on the baseline characterisation for fish and shellfish ecology.	NRW (A) agrees that the data collected through the site-specific surveys and through the desktop review of existing literature and data sources are sufficient to appropriately characterise the fish ecology for the Mona Offshore Wind Project.	Agreed
NRW.FSF.5	Scoping	Agreement to the scoping of impacts for the EIA for fish and shellfish ecology.	NRW (A) agree with the scoping of impacts for the EIA for Fish and Shellfish Ecology.	Agreed
NRW.FSF.6	Study area	The EIA study area is appropriate for the receptors and impacts assessed.	NRW (A) agrees that the EIA study area is appropriate for the receptors and impacts assessed.	Agreed

Reference Number	Discussion point	Applicant's Position	NRW (A)'s Position	Status
NRW.FSF.7	Project design envelope	The EIA chapter has identified, described and assessed the maximum design scenario for the EIA.	NRW (A) agrees that the design envelope has been adequately assessed.	Agreed
NRW.FSF.8	Assessment methodology	The sensitivity of fish and shellfish ecology receptors has been correctly identified and sufficiently described within the EIA.	NRW (A) agree that the sensitivity of fish and shellfish receptors (except cod but see NRW.FSF.16) has been correctly identified and sufficiently described within the EIA.	Agreed
NRW.FSF.9	Assessment methodology	Agreement on approach to the underwater sound modelling and approach to assessment of underwater sound impacts.	NRW (A) agree with the approach that the Applicant has taken in regards to underwater sound modelling and sound impact assessment.	Agreed
NRW.FSF.10	Assessment methodology	Cod and herring should be considered to have high sensitivity to underwater sound.	NRW (A) agrees with the Marine Management Organisation (MMO) that cod should be considered as having high sensitivity to sound. NRW (A) agrees that herring have a high sensitivity to sound.	Agreed
NRW.FSF.11	Assessment methodology	The characterisation of sandeel spawning potential is sufficient to inform the EIA.	NRW (A) consider the characterisation of sandeel spawning potential sufficient to inform the EIA.	Agreed
NRW.FSF.12	Assessment methodology	The characterisation of herring spawning potential is sufficient to inform the EIA.	NRW (A) consider the characterisation of herring spawning potential sufficient to inform the EIA.	Agreed
NRW.FSF.13	Assessment methodology	The list of projects screened into the CEA in the EIA is appropriate.	NRW (A) agrees the list of projects is appropriate.	Agreed
NRW.FSF.14	Assessment of the effects from the Mona Offshore Wind Project alone	On the basis that there is no direct overlap with fish features of MCZs of sound contours with the potential to cause injury or behavioural responses, there will be no risk of hindering conservation objectives of any MCZs with fish features.	NRW (A) agrees there is no direct overlap with fish features of MCZs of sound contours as the only Welsh MCZ is Skomer, which does not include any fish features.	Agreed
NRW.FSF.15	Assessment of the effects from the Mona Offshore Wind Project alone	There will be no significant effects on fish and shellfish receptors in EIA terms for the Mona Offshore Wind Project alone with the exception of underwater sound impacts.	NRW (A) agree that for all impacts, other than underwater sound, no significant effects on fish and shellfish receptors are predicted for the project alone.	Agreed

Reference Number	Discussion point	Applicant's Position	NRW (A)'s Position	Status
NRW.FSF.16	Assessment of the effects from the Mona Offshore Wind Project alone	The potential impacts on cod high intensity spawning habitat have been assessed in relation to the underwater sound impacts arising from construction activities, with these specifically discussed in section 3.9.3 of Volume 2, Chapter 3: Fish and shellfish ecology (APP-055). In terms of area impacted, these do result in up to 21.64% of the high intensity cod spawning grounds within the study area being impacted by underwater sound. However, the total area is not the only factor taken into account when assessing the significance of the overall impact on cod.	NRW (A) continue to disagree that, for the Mona Offshore Wind Project 'alone', impacting 21.64% of the cod high intensity spawning habitat as a result of disturbance from underwater noise can be assessed as minor. The Applicant has now submitted an updated Outline UWSMS at Deadline 5 (REP5-028), and following its full review, we are content that the range of measures included are likely to be sufficient to reduce the impact from piling activities to spawning cod. We welcome the Applicant's commitment to continue to engage with NRW (A) to develop the UWSMS post-consent	Not agreed – no material impact
NRW.FSF.17	Assessment of the effects from the Mona Offshore Wind Project cumulatively with other projects	There will be no significant effects on fish and shellfish receptors in EIA terms for the Mona Offshore Wind Project cumulatively with other plans and projects, with the exception of piling impacts.	Notwithstanding NRW.FSF.15, NRW.FSF.16 and NRW.FSF.18, NRW (A) agrees with the assessment of the effects from the Mona Offshore Wind project cumulatively with other plans and projects.	Agreed
NRW.FSF.18	Assessment of the effects - from the Mona Offshore Wind Project alone and cumulatively with other projects	For piling impacts, no significant effects are predicted on fish and shellfish receptors, other than cod and herring during the spawning period.	With the exception of cod and herring (see NRW.FSF.16 and NRW.FSF.20), NRW (A) agrees with the piling effects predicted on fish and shellfish receptors.	Agreed
NRW.FSF.19	Mitigation and monitoring	The mitigation measures and conditions outlined in Volume 2, Chapter 3: Fish and shellfish ecology (APP-055) and the Mitigation and Monitoring schedule (REP6-026) are appropriate and will ensure significant effects are avoided (with the exception of underwater sound).	NRW(A) agree that the mitigation measures and conditions included in Volume 2, Chapter 3: Fish and shellfish ecology (APP-055) and the Mitigation and Monitoring schedule (J10 F06) are appropriate.	Agreed

Reference Number	Discussion point	Applicant's Position	NRW (A)'s Position	Status
NRW.FSF.20	Mitigation and monitoring	The Outline Underwater Sound Management Strategy (UWSMS) (REP5-028) is appropriate and will ensure significant effects from underwater sound are avoided. The Applicant has updated the Outline UWSMS (REP5-028) at Deadline 5 to take into consideration NRW (A)'s views with respect to consideration of a potential temporal restriction to reduce effects on cod spawning (for the project alone and cumulatively).	As noted in our Relevant Representation (RR-011), we agree, with the commitment to develop an UWSMS and that it contains a wide range of potential mitigation measures that could be appropriate to reduce the impact on fish. We welcome the Applicant's recent amendments to the document at Deadline 5 (REP5-028) and their commitment to continue to engage with NRW (A) to develop the UWSMS post-consent.	Agreed
Draft DCO				
NRW.FSF.21	Monitoring requirements/ conditions	The mitigation and monitoring outlined in Volume 2, Chapter 3: Fish and shellfish ecology (APP-055) and the Mitigation and Monitoring schedule (REP6-026) are suitable for the purposes of the DCO application.	We agree that the measures included in the Outline UWSMS (REP5-028) are likely to be sufficient to reduce the impacts to spawning cod and herring. We welcome the commitment from the Applicant to continue to engage with NRW (A) on the strategy during and post examination.	Agreed

1.4.6 Marine mammals

Table 1.9: Agreement Log between the parties on marine mammals.

Reference Number	Discussion point	Applicant's Position	NRW (A)'s Position	Status
EIA				
NRW.MM.1	Consultation	The Applicant has undertaken adequate consultation with NRW (A) on potential impacts on marine mammals.	NRW (A) agrees that the Applicant has undertaken adequate consultation with NRW (A) on potential impacts on marine mammals.	Agreed
NRW.MM.2	Consultation	The EIA has had due regard to matters raised by NRW (A) through statutory and non-statutory consultation on potential impacts on marine mammals.	NRW (A) agrees that the EIA has had due regard to matters raised by NRW (A).	Agreed
NRW.MM.3	Policy and planning	The Application has identified and considered the plans and policies relevant to marine mammals, within NRW (A)'s remit.	NRW (A) agrees that the Application has identified and considered the plans and policies relevant to marine mammals within our remit.	Agreed
NRW.MM.4	Surveys	Agreement on aerial surveys with respect to marine mammals, in particular the use of an appropriate buffer around the Mona Array Area.	NRW (A) agrees with the data collected through surveys and literature including the data sources used to characterise the baseline, as well as the management unit approach adopted (APP-056).	Agreed
NRW.MM.5	Baseline environment	Agreement on the baseline characterisation for marine mammals.	NRW (A) agrees with the data collected through surveys and literature including the data sources used to characterise the baseline, as well as the management unit approach adopted (APP-056).	Agreed
NRW.MM.6	Scoping	Agreement to the scoping of impacts for the EIA for marine mammals.	NRW (A) agrees with the scoping of impacts for the EIA for marine mammals.	Agreed
NRW.MM.7	Study area	The EIA study area is appropriate for the receptors and impacts assessed.	NRW (A) agrees with the data collected through surveys and literature including the data sources used to characterise the baseline, as well as the management unit approach adopted (APP-056).	Agreed

Reference Number	Discussion point	Applicant's Position	NRW (A)'s Position	Status
NRW.MM.8	Project design envelope	The EIA chapter has identified, described and assessed the maximum design scenario for the EIA.	NRW (A) agrees that the maximum design scenario has been identified, described, and assessed for the EIA.	Agreed
NRW.MM.9	Assessment methodology	The sensitivity of marine mammal receptors has been correctly identified and sufficiently described within the EIA.	NRW (A) agrees that the sensitivity of marine mammal receptors has been correctly identified and sufficiently described within the EIA and the supplementary information provided as part of the Applicants response to our relevant representations.	Agreed
NRW.MM.10	Assessment methodology	Agreement on approach to underwater sound modelling and approach to assessment of underwater sound impacts.	NRW (A) broadly agrees with the approach to underwater sound modelling and assessment of underwater sound impacts. Our concerns on this issue have been discussed with the Applicant, and based on their Deadline 5 submissions, we can confirm that this matter has been resolved.	Agreed
NRW.MM.11	Assessment methodology	Agreement on scoping of species to be included within the assessments.	NRW (A) agrees with the species scoped into the assessments.	Agreed
NRW.MM.12	Assessment methodology	Agreement on approach to densities and reference populations.	NRW (A) agrees with the approach to densities and reference populations.	Agreed
NRW.MM.13	Assessment methodology	The list of projects screened into the CEA in the EIA is appropriate.	NRW (A) agrees with the list of projects screened into the CEA in the EIA.	Agreed
NRW.MM.14	Assessment of the effects from the Mona Offshore Wind Project alone	Other than unexploded ordnance (UXO) impacts, there will be no significant effects on marine mammal receptors in EIA terms for the Mona Offshore Wind Project alone.	NRW (A) agrees with the overall conclusions presented in the EIA, notwithstanding any matters relating to UXO clearance.	Agreed
NRW.MM.15	Assessment of the effects from the Mona Offshore Wind Project alone	The Applicant's view is that it is unrealistic to assess injury and disturbance from vessel use by presenting a sum of the impact ranges of all vessels within each offshore windfarm (as agreed with NRW through their S42 response). The Applicant included	Please see section 1.2.1.4 of our deadline 5 submission. While we fully agree that the Applicant engaged with NRW (A) in constructive discussions over	Agreed

Reference Number	Discussion point	Applicant's Position	NRW (A)'s Position	Status
		further evidence and a more detailed approach in the assessment of elevated underwater sound from vessels in the final Environmental Statement to justify the conclusion of low magnitude. The Applicant has carried out further engagement with NRW (A) and clarified 'a single point in time' is an accurate and appropriate representation of the assessment methodology (see REP4-105.39 to REP4-105.48 in the Applicant's Response to NRW D4 Submission (REP5-061). The Applicant considers the conclusions of the assessment are agreed (no significant effect/adverse effect from the Mona Offshore Wind Project alone). NRW (A) confirmed in their Deadline 5 submission (REP5-098) that the matter is principally an academic discussion with no material impact on the conclusions of the assessment and agreed this matter is closed.	our concerns, we do not agree that these were "addressed" given that we agreed to disagree over the methodological discussion. However, during the meeting of 8 November 2024, we managed to reach a compromise position where, the Applicant agreed to include a clarification that the static radius approach used is a conservative assumption for a single point in time for a single vessel. Given this compromise, and the fact that the conclusions of the assessment are agreed, we can consider this matter closed.	
NRW.MM.16	Assessment of the effects from the Mona Offshore Wind Project cumulatively with other projects	Other than piling and UXO impacts, there will be no significant effects on marine mammal receptors in EIA terms for the Mona Offshore Wind Project cumulatively.	NRW (A) agrees with the overall conclusions presented in the cumulative assessment of the EIA.	Agreed
NRW.MM.17	Assessment of the effects from the Mona Offshore Wind Project alone	For UXO impacts, although a significant effect (injury) on harbour porpoise was predicted in Volume 2, Chapter 4: Marine mammals (APP-056) for high order clearance of the maximum size of UXO, the Applicant has removed high-order UXO clearance from the DCO and therefore no significant effect remains. The Applicant updated the Outline MMMP (REP5-032) at Deadline 5 in light of feedback from SNCBs during the Examination process.	We welcome the Applicant's decision to remove high-order clearance from the draft DCO and the standalone ML application in Schedule 14, Condition 21(1) of the draft DCO (REP5-006). As noted in NRW's Deadline 5 Submission, our position on the use of different UXO clearance methods (low-order cf high-order) are clearly stated in our written representations (REP1-056), and we confirm that our view remains that all UXO clearance is restricted to low-noise methods only, and that high order clearance	Agreed

Reference Number	Discussion point	Applicant's Position	NRW (A)'s Position	Status
		In light of SNCBs concerns, the Applicant has committed to the use of low order clearance only (i.e. UXO clearance method which does not seek to detonate the unexploded ordnance). High order UXO clearance will not be authorised under the Draft DCO or the standalone NRW Marine Licence (ML). This is reflected in the updated drafting of the deemed marine licence in Schedule 14, Condition 21 in the Draft DCO made at Deadline 5 (REP5-006), and for clarity, the Marine Licence Principles Document (REP5-022) has been updated to remove high order UXO clearance from the NRW marine licence application. The Applicant confirms that should high order clearance be required this will be subject to a separate NRW marine licence application.	should only be used in exceptional circumstances. As previously noted, NRW is currently a signatory to the 2022 Joint Interim Position Statement on UXO Clearance. We once again draw attention to a pending update to the Position Statement on UXO clearance that is currently in development (and which we have contributed to). Once the Position Statement has been published, we will draw the Applicant's attention to this document immediately, so that they may consider it in further development of project detail post-consent.	
NRW.MM.18	Assessment of the effects from the Mona Offshore Wind Project cumulatively with other projects	For piling impacts, although a significant cumulative effect (in EIA terms) is predicted on bottlenose dolphin, any such effects will be managed and avoided through measures set out in the Outline MMMP (REP5-032) and Outline UWSMS (REP5-028), which will be agreed with stakeholders post consent. The Applicant updated the Outline MMMP (REP5-032) and Outline UWSMS (REP5-028) at Deadline 5 in light of feedback received from SNCBs during Examination.	We welcome the Applicant's updates and amendments to the Outline UWSMS (REP5-028) and Outline MMMP (REP5-032) presented at Deadline 5. We can consider this matter agreed.	Agreed
NRW.MM.19	Mitigation and monitoring	The mitigation measures and conditions outlined in Volume 2, Chapter 4: Marine mammals (APP-056) and the Mitigation and Monitoring schedule (J10 F06) are appropriate and will ensure significant effects are avoided. The Applicant updated, the Outline MMMP(REP5-032) and Outline UWSMS (REP5-028) at Deadline 5 in light of	We welcome the Applicant's updates and amendments to the Outline UWSMS (REP5-028) and Outline MMMP (REP5-032) presented at Deadline 5. We can consider this matter agreed.	Agreed

Reference Number	Discussion point	Applicant's Position	NRW (A)'s Position	Status
		feedback received from SNCBs during Examination.		
Other Documents and Plans				
NRW.MM.20	Monitoring requirements/ conditions	The mitigation and monitoring outlined in Volume 2, Chapter 4: Marine mammals (APP-056) and the Mitigation and Monitoring schedule (REP6-026) are suitable for the purposes of the DCO application.	NRW (A) agrees that the measures outlined in these documents are suitable for the purposes of the DCO application.	Agreed

1.4.7 Offshore ornithology

Table 1.10: Agreement Log between the parties on offshore ornithology.

Reference Number	Discussion point	Applicant's Position	NRW (A)'s Position	Status
EIA				
NRW.OO.1	Consultation	The Applicant has undertaken adequate consultation with NRW (A) on potential impacts on offshore ornithology. The Applicant has submitted several documents for examination demonstrating that further regard has been given to NRW (A)'s advice during the pre-application phase and matters discussed and agreed upon through the EWG process. This includes an 'Offshore Ornithology Supporting Information in line with SNCB advice' (REP4-030) submitted at Deadline 4, which provides further assessments considering a range-based approach as advised by NRW (A). In addition, the Applicant submitted an Offshore Ornithology Cumulative Effects Assessment and In-combination Gap-filling Historical Projects Technical Note (REP4-029) at Deadline 4, following the SNCB methodology for quantifying impacts from historical projects. At Deadline 5 the Applicant submitted a Summary of Principal Offshore Ornithological Matters (REP5-072) and Offshore Ornithology Additional Supporting Cumulative Assessment Information in line with SNCB Advice (REP5-075) to address NRW(A) comments on the Deadline 4 submissions.	Good progress was made through the EWG during the pre-application process, with broad agreement on most areas. However, some approaches to assessments presented in the application differed to those agreed through the EWG process or had not been discussed with the EWG before the submission (see comments in our Relevant and Written Representations). We welcome and acknowledge the work the Applicant has done through the examination and the additional documents submitted at Deadline 4 and 5, which largely follow the advice provided by NRW (A).	Agreed
NRW.OO.2	Consultation	The EIA has had due regard to matters raised by NRW (A) through statutory and non-statutory consultation on potential impacts on offshore ornithology. The Applicant has submitted several documents for examination demonstrating that further regard	See comments on NRW.OO.1 above	Agreed

Reference Number	Discussion point	Applicant's Position	NRW (A)'s Position	Status
		has been given to NRW (A)'s advice during the pre-application phase and matters discussed and agreed upon through the EWG process. This includes an 'Offshore Ornithology Supporting Information in line with SNCB advice' (REP4-030) submitted at Deadline 4, which provides further assessments considering a range-based approach as advised by NRW (A). In addition, the Applicant submitted an Offshore Ornithology Cumulative Effects Assessment and In-combination Gap-filling Historical Projects Technical Note (REP4-029) at Deadline 4, following the SNCB methodology for quantifying impacts from historical projects. At Deadline 5, the Applicant submitted a Summary of Principal Offshore Ornithological Matters (REP5-072) and Offshore Ornithology Additional Supporting Cumulative Assessment Information in line with SNCB Advice (REP5-075) to address NRW(A) comments on the Deadline 4 submissions.		
NRW.OO.3	Policy and planning	The Application has identified and considered the plans and policies relevant to offshore ornithology within NRW (A)'s remit.	NRW (A) agrees that the Application has identified and considered the plans and policies relevant to offshore ornithology	Agreed
NRW.OO.4	Surveys	Agreement on broad approach to site specific digital aerial surveys.	NRW (A) agrees with the broad approach to aerial surveys. NRW (A) welcomes the power analysis work that has been undertaken for Mona of using baseline survey data to ensure an appropriate level of survey coverage and data analysis has been achieved. NRW (A) considers the approach taken to be adequate, essentially comparing theoretical baseline and impacted areas to determine how many birds would need to be sampled to achieve suitable power to detect desired effect sizes. The work undertaken does provide some confidence that the surveys conducted are fit for purpose in terms of baseline characterisation for consideration in EIA and HRA.	Agreed

Reference Number	Discussion point	Applicant's Position	NRW (A)'s Position	Status
NRW.OO.5	Scoping	Agreement to the scoping of impacts for the EIA for offshore ornithology.	NRW agrees with the scoping of impacts for the EIA for offshore ornithology	Agreed
NRW.OO.6	Baseline environment	Agreement on the baseline characterisation for the Mona Offshore Cable Corridor including the intertidal area using desktop data sources and digital aerial survey.	NRW (A) agrees with the approach to characterisation for the export cable corridor, including that relevant to the intertidal area of cable landfall.	Agreed
NRW.OO.7	Baseline environment	Agreement on the baseline characterisation for offshore ornithology.	Power analysis report has been reviewed by NRW (A) and the work undertaken does provide NRW (A) with some confidence that the digital aerial surveys conducted are fit for purpose in terms of baseline characterisation for consideration in EIA and HRA.	Agreed
NRW.OO.8	Study area	The EIA study area is appropriate for the receptors and impacts assessed.	The approach to the study area as described in Volume 2, Chapter 5: Offshore ornithology (REP4-007) (5.3.4 Study areas) is agreed. However, see comment NRW.OO.16 regarding the approach to estimating regional breeding populations.	Not agreed – not material
NRW.OO.9	Project design envelope	The EIA chapter has identified, described and assessed the maximum design scenario for the EIA.	NRW (A) agree that Volume 2, Chapter 5: Offshore ornithology (REP4-007) Table 5.21 sets out the Maximum Design Scenario and that this scenario is assessed.	Agreed
NRW.OO.10	Assessment methodology	The sensitivity of offshore ornithology receptors has been correctly identified and sufficiently described within the EIA.	NRW (A) agree that the sensitivity of offshore ornithology receptors has been correctly identified and sufficiently described in Volume 2, Chapter 5: Offshore ornithology (REP4-007) Table 5.12.	Agreed
NRW.OO.11	Assessment methodology	Agreement on the approach to displacement assessment methodology.	As a range of % displacement and % mortality rates have been considered and assessed with Volume 2, Chapter 5: Offshore ornithology (REP4-007), as advised by NRW (A), NRW (A) agree with the approach to displacement assessment methodology.	Agreed

Reference Number	Discussion point	Applicant's Position	NRW (A)'s Position	Status
NRW.OO.12	Assessment methodology	Agreement on the approach to collision risk assessment methodology. The Applicant submitted an 'Offshore Ornithology Supporting Information in line with SNCB advice' (REP4-030) at Deadline 4 that presents the upper and lower confidence intervals of potential collision impacts, as requested by the NRW(A) during Examination.	NRW (A) agrees with the approach of using the stochastic Collision Risk Model (sCRM) and largely agree with the input parameters used. However, it should be noted that NRW (A) advise the use of the species-group avoidance rates rather than the species-specific avoidance rates (as was advised during the EWG). We note that in Section 5.7.5 of Volume 2, Chapter 5: Offshore ornithology (REP4-007) the Applicant has presented potential impacts from the project alone for using both the species-specific and species-group avoidance rates. Therefore, NRW (A) are content with this approach. However, we note that we will base our advice on the predicted impacts using the Statutory Nature Conservation Body (SNCB) advised species-group avoidance rates.	Agreed with caveats
NRW.OO.13	Assessment methodology	Agreement on the approach to migratory bird collision risk assessment methodology	NRW (A) confirms agreement to the approach set out by the Applicant in EWG05 during that meeting as set out in EWG05 meeting minutes.	Agreed
NRW.OO.14	Assessment methodology	Agreement on the approach to apportioning assessment methodology. The Applicant resubmitted Volume 6, Annex 5.5: Offshore ornithology apportioning technical report (REP2-022) at Deadline 2, which sought to address NRW (A)'s concerns on apportioning. The Applicant also submitted an Offshore ornithology apportioning clarification note (REP4-042) at Deadline 4 setting out how the non-breeding season apportioning has been undertaken to account for the site-specific aerial survey data. At Deadline 5 the Applicant submitted the Offshore ornithology additional supporting in-combination assessment information in line with SNCB advice (REP5-074) which followed NRW (A)'s recommended methodology for stable age structures for Skomer, Skokholm and the Seas off	Following the updates undertaken by the Applicant through the examination, particularly at Deadlines 4 and 5, NRW (A) is now content with the apportioning undertaken for both the breeding season and non-breeding seasons in both the alone and in-combination assessments. See NRW Deadline 5 (REP5-098) and Deadline 6 responses for full details.	Agreed

Reference Number	Discussion point	Applicant's Position	NRW (A)'s Position	Status
		Pembrokeshire/Sgomer, Sgogwm a Moroedd Penfro SPA, Glannau Aberdaron ac Ynys Enlli/Aberdaron Coast and Bardsey Island SPA and Grassholm SPA.		
NRW.OO.15	Assessment methodology	Agreement on the approach to Population Viability Analysis (PVA) and that PVAs have been undertaken where appropriate. The Applicant resubmitted Volume 6, Annex 5.6: Offshore ornithology population viability analysis technical (REP2-024) at Deadline 2, which addressed a number of NRW's concerns with respect to PVA. An 'Offshore Ornithology Supporting Information in line with SNCB advice' (REP4-030) was also submitted at Deadline 4, which provides the collision and displacement assessments following the full range of SNCB-advised assessment scenarios and provides PVA where required. At Deadline 5 the Applicant submitted Offshore ornithology additional supporting in-combination assessment information in line with SNCB advice (REP5-074) which followed NRW (A)'s recommended methodology for stable age structures and presented PVAs (where required) for Skomer, Skokholm and the Seas off Pembrokeshire/Sgomer, Sgogwm a Moroedd Penfro SPA, Glannau Aberdaron ac Ynys Enlli/Aberdaron Coast and Bardsey Island SPA and Grassholm SPA. The Applicant understands 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. The Applicant and NRW(A) have undertaken further engagement between deadline 5 and deadline 6 on 16 December 2024 with regard to northern gannet at Grassholm SPA and	Following the updates undertaken by the Applicant through the examination, most notably submission of REP6-088 at Deadline 6, NRW (A) can now agree that PVAs have been undertaken where appropriate.	Agreed

Reference Number	Discussion point	Applicant's Position	NRW (A)'s Position	Status
		have provided the additional information requested (including PVAs) at Deadline 6 (see Revised Assessment for Northern Gannet at Grassholm SPA (REP6-088) to allow NRW(A) to confirm their position on adverse effects on site integrity.		
NRW.OO.16	Assessment methodology	The approach to estimating regional breeding populations is accurate and robust.	NRW (A) (and other SNCB, Natural England/Joint Nature Conservation Committee (JNCC)) advice has been to define the breeding season regional population on the Biologically Defined Minimum Population Scales (BDMPS) for both the project alone and cumulative assessments. However, the Applicant's approach in the submission has been to define the reference population by foraging range for the project alone assessment and to follow the NRW (A) (and other SNCB) advised approach for cumulative assessments. This approach was discussed during EWG07, and the Applicant and NRW (A) agreed to disagree on this matter. However, we note that with the exception of gannet and Manx shearwater, the Applicant's approach results in more precautionary breeding season reference populations. We note that in Volume 2, Chapter 5: Offshore ornithology (REP4-007) for gannet and Manx shearwater, the Applicant has assessed impacts from the Mona Offshore Wind Project alone against both the SNCB advised more precautionary regional breeding season populations and the Applicants calculated populations.	Not agreed – not material
NRW.OO.17	Assessment methodology	The list of projects screened into the CEA in the EIA is appropriate.	NRW (A) agrees with the projects screened into the EIA cumulative assessment. The Applicant has also undertaken a 'gap fill' exercise for historic projects and these have been included in the cumulative and in-combination assessments in the updated assessments submitted at Deadline 4 (REP4-028 and REP4-030) and Deadline 5 (REP5-073 and-074). The Applicant has also	Agreed

Reference Number	Discussion point	Applicant's Position	NRW (A)'s Position	Status
			included in REP5-073 and REP5-074 quantitative figures for projects with data that have become available since the submission (updated Morgan and Morecambe Generation Assets and Llŷr 1).	
NRW.OO.18	Assessment of the effects from the Mona Offshore Wind Project alone	There will be no significant effects on offshore ornithology receptors in EIA terms for the Mona Offshore Wind Project alone. The Applicant resubmitted Volume 2, Chapter 5: Offshore ornithology (REP4-007) at Deadline 4, which sought to address NRW (A)'s concerns with respect to errata. In addition, an 'Offshore Ornithology Supporting Information in line with SNCB advice' (REP3-059) was submitted at Deadline 3, which provided the collision and displacement assessments following the full range of SNCB-advised assessment scenarios and provided greater clarity on the Applicant's EIA approach. The conclusions of the Deadline 3 submissions are that there is no potential for significant effects for any impacts from the Mona Offshore Wind Project alone.	Following the Applicant's updated assessments at Deadline 3 (REP3-059), we can agree that a significant adverse effect can be ruled out for all species at EIA scale (see Appendix 1 of Annex A of REP3-090 and Section 1.1.1 of Annex B of REP4-105).	Agreed
NRW.OO.24	Assessment of the effects from the Mona Offshore Wind Project alone	There will be no significant effects on the features of the Great Orme SSSI in EIA terms for the Mona project alone. The Applicant submitted an updated Offshore Ornithology Assessment of Pen y Gogarth/Great Orme's Head SSSI (REP4-025) at Deadline 4 to reflect further guidance from NRW (A) received at Deadlines 2 and 3.	Following the Applicant's updated assessments at Deadline 4 (REP4-025), we can agree that a significant adverse effect can be ruled out for the guillemot and razorbill features of the SSSI for the project alone (see Section 1.1.2 of REP5-098).	Agreed
NRW.OO.25	Assessment of the effects from the Mona Offshore Wind Project alone	There will be no significant effects on the kittiwake feature of the Great Orme SSSI in EIA terms for the Mona project alone. The Applicant submitted an updated Offshore Ornithology Assessment of Pen y Gogarth/Great	We consider there is the potential for the impacts from the project alone to have the potential to give rise to a moderate (i.e. significant) adverse impact to the kittiwake feature. However, we are content that the Applicant has provided proportionate	Not agreed- not material

Reference Number	Discussion point	Applicant's Position	NRW (A)'s Position	Status
		Orme's Head SSSI (REP4-025) at Deadline 4 to reflect further guidance from NRW (A) received at Deadlines 2 and 3.	mitigation (through the air draught height) for kittiwake for this site (see Section 1.1.2 of REP5-098).	
NRW.OO.19	Assessment of the effects from the Mona Offshore Wind Project cumulatively with other projects	There will be no significant effects on ornithology receptors in EIA terms for the Mona Offshore Wind Project cumulatively with other plans and projects. The Applicant resubmitted Volume 2, Chapter 5: Offshore ornithology (REP4-007) at Deadline 4, which addresses NRW (A)'s concerns with respect to errata. In addition, an 'Offshore Ornithology Supporting Information in line with SNCB advice' (REP4-030) was submitted at Deadline 4, which provides the collision and displacement assessments following the full range of SNCB advised assessment scenarios and provides greater clarity on the Applicant's EIA approach. An 'Offshore Ornithology Cumulative Effects Assessment and In-combination Gap-filling Historical Projects Technical Note' (REP4-029) was also submitted at Deadline 4, which follows the SNCB methodology for quantifying impacts from historical projects. The Applicant also submitted a Review of Offshore ornithology CEA and In-Combination Assessment (REP4-027) in light of further information on cumulative plans and projects at Deadline 4. At Deadline 5, the Applicant submitted an Offshore Ornithology Additional Supporting Cumulative Assessment Information in line with SNCB Advice (REP5-075) to address NRW (A)'s comments on the Deadline 4 submissions. A consolidation exercise has been undertaken at Deadline 7 to bring all the relevant examination materials into the Environmental Statement. This includes an updated Volume 2, Chapter 5: Offshore ornithology (F2.5 F04), which was shared	Following the Applicant's updated cumulative assessments at Deadline 5 (REP5-075), we can agree that a significant adverse effect can be ruled out for all species, except GBBG, for cumulative impacts at EIA scale (see Appendix 1 of REP6-137). We note however that the Applicant intends to submit an updated Cumulative Effects Assessment (CEA) at Deadline 7, incorporating figures from two additional historical wind farms - Barrow and North Hoyle. The Applicant provided the updated figures concluded in this assessment to NRW (A) via email on 8 January 2025. We note the updated cumulative numbers the Applicant intends to submit would not change our conclusions made for all species in our D6 response (REP6-137). Therefore, subject to these figures being identical to those submitted as part of the updated CEA at Deadline 7, we maintain our position above that a significant adverse effect can be ruled out for all species except GBBG, for cumulative impacts at EIA scale. However, our advice may change should the updated assessments submitted by the Applicant at Deadline 7 differ from that presented to us on 8 January 2025.	Agreed with caveats

Reference Number	Discussion point	Applicant's Position	NRW (A)'s Position	Status
		with NRW via email on 8 January 2025 ahead of Deadline 7. The conclusions of these submissions are that there is no potential for significant effects for any impacts from the Mona Offshore Wind Project cumulatively with other plans and projects.		
NRW.OO.27	Assessment of the effects from the Mona Offshore Wind Project cumulatively with other projects	There will be no significant effects on great black backed gulls in EIA terms for the Mona Offshore Wind Project cumulatively with other plans and projects. See NRW.OO.19 for details of the submissions that have informed the Applicant's position.	As set out in our Deadline 4 response (see paragraph 93 of Annex A of REP4-105) the current indicative great black-backed gull (GBBG) cumulative figure using the SNCB advised species-group avoidance rate and including all gap filled projects, using consented parameters where available and as-built where consented information is not available, equates to 9.67% % of baseline mortality of the BDMPS population (see Table 1.18 of REP3-044). We note that this figure has been updated to a total of 171 birds, equating to 10.17% of baseline mortality in REP4-028. This also still does not take account of the best available figures for the Morgan and Morecambe projects or the additional projects identified by the Applicant in REP3-058. Based on consideration of the PVA metrics presented in Appendix D of REP3-044, the conservation assessment etc. presented in paragraph 93 of Annex A of REP4-105, we are unable to rule out a moderate adverse, i.e. significant adverse impact, on GBBG from cumulative collision mortality at an EIA scale. However, we are content that the Applicant has provided proportionate mitigation (through the air draught height) for GBBG [REP4-105].	Not agreed- not material
NRW.OO.26	Assessment of the effects from the Mona Offshore Wind Project	There will be no significant effects on the features of the Great Orme SSSI in EIA terms for the Mona project cumulatively with other plans and projects.	Following the Applicant's updated assessments at Deadline 4 (REP4-025), we can agree that a significant adverse effect can be ruled out for the guillemot and razorbill features of the SSSI for the	Agreed

Reference Number	Discussion point	Applicant's Position	NRW (A)'s Position	Status
	cumulatively with other projects	The Applicant submitted an updated Offshore Ornithology Assessment of Pen y Gogarth/Great Orme's Head SSSI (REP4-025) at Deadline 4 to reflect further guidance from NRW(A) received at Deadlines 2 and 3.	project cumulatively with other plans and projects (see Section 1.1.2 of REP5-098).	
NRW.OO.28	Assessment of the effects from the Mona Offshore Wind Project cumulatively with other projects	There will be no significant effects on the kittiwake feature of the Great Orme SSSI in EIA terms for the Mona project cumulatively with other plans and projects. The Applicant submitted an updated Offshore Ornithology Assessment of Pen y Gogarth/Great Orme's Head SSSI (REP4-025) at Deadline 4 to reflect further guidance from NRW(A) received at Deadlines 2 and 3.	We consider there is the potential for the cumulative impacts to have the potential to give rise to a moderate (i.e. significant) adverse impact to the kittiwake feature. However, we are content that the Applicant has provided proportionate mitigation (through the air draught height) for kittiwake for this site (see Section 1.1.2 of REP5-098).	Not agreed- not material
NRW.OO.20	Assessment of the effects from the Mona Offshore Wind Project cumulatively with other projects	Agreement on approach to cumulative assessment for projects where impact quantification is unavailable. The Applicant submitted an Offshore Ornithology Cumulative Effects Assessment and In-combination Gap-filling Historical Projects Technical Note (REP4-029) at Deadline 4, which follows the SNCB methodology for quantifying impacts from historical projects.	Following the Applicant's CEA and gap-fill of historic projects in REP3-044 and updated in REP4-028 and REP5-075, NRW (A) agree that the Applicant has sufficiently filled the gaps for the historic projects in the CEA.	Agreed
NRW.OO.21	Mitigation and monitoring	The Applicant has committed to a seasonal timing restriction of 1 November to 31 March in the Measures to Minimise Impacts to Marine Mammals and Rafting Birds (REP5-030) on UXO clearance activities and export cable installation vessels undertaking active cable installation in the Liverpool Bay/Bae Lerpwl Special Protection Area (SPA) via the Measures to Minimise Impacts to Marine Mammals and Rafting Birds (REP5-030). This seasonal restriction does not apply to trenchless techniques at the Mona landfall, but	We acknowledge the Applicant's position set out in their response to RR-011.24 of PDA-008 that prohibiting works at the trenchless techniques exit pits during the overwintering period would add further pressure to the installation window for offshore export cables. However, any disturbance impact to features of the SPA will be temporary for the time of the vessel presence; birds will be able to return once the vessel has gone; there will be other habitat available within the SPA to the birds for the time they are disturbed from the landfall	Agreed

Reference Number	Discussion point	Applicant's Position	NRW (A)'s Position	Status
		vessel movements will be managed to minimise effects on features of the SPA. The Applicant provided updated Measures to minimise disturbance to marine mammals and rafting birds from transiting vessels (REP5-030) at Deadline 5, to provide clarity on which mitigation measures relate to which vessel activity.	area; up to eight movements across the key winter period of Nov-Mar represents a small proportion over this timescale; and a commitment to Horizontal Directional Drilling (HDD) for landfall has been made, NRW (A) do not expect this temporary activity to result in an Adverse Effect on Site Integrity (AEoSI). Please also see comments on NRW.HRA.36 below.	
NRW.OO.22	Mitigation and monitoring	The mitigation measures and conditions outlined in Volume 2, Chapter 5: Offshore ornithology (REP4-007), the Mitigation and Monitoring schedule (J10 F06) and the Marine Licence Principles Document (REP5-022) are appropriate and will ensure significant effects are avoided where possible. At Deadline 5, the Applicant committed to the use of low order UXO clearance methods only. High order UXO clearance will, therefore, not be authorised under the DCO, and will not be applied for under the NRW Marine Licence (ML). This is reflected in the updated drafting of the deemed marine licence in Schedule 14, Condition 21 in the Draft DCO made at Deadline 5 (REP5-006), and for clarity, the Marine Licence Principles Document (REP5-022) has been updated to remove high order UXO clearance from the NRW marine licence application. The Applicant confirms that should high order clearance be required, this will be subject to a separate NRW marine licence application. The Applicant has also committed to a seasonal restriction on low order UXO clearance and offshore export cable laying within the Liverpool Bay/Bae Lerpwl SPA between 1 November and 31 March. This is outlined in Measures to minimise disturbance to marine mammals and rafting birds from transiting vessels (REP5-030).	NRW (A) welcome the offshore ornithology mitigation measures put forward in REP4-007 and the subsequent updates at Deadline 5, namely: • 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 [REP5-030] will be included within the Offshore EMP. Following the updates at Deadline 5 in REP5-030 they will include a seasonal restriction between 1 November – 31 March now applying to all UXO clearance activities (low order) and cable installation vessels undertaking active cable installation within the Liverpool Bay/Bae Lerpwl SPA. • 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.	Agreed

Reference Number	Discussion point	Applicant's Position	NRW (A)'s Position	Status
			As a result of the Applicant's updated commitment at Deadline 5, we can agree that the mitigation measures proposed are appropriate. Please see our response to ExA Q 2.17.19 in REP5-100 and Appendix 2 of REP6-137 for further details.	
Draft DCO				
NRW.OO.23	Monitoring requirements/ conditions	The mitigation and monitoring outlined in Volume 2, Chapter 5: Offshore ornithology (REP4-007) and the Mitigation and Monitoring schedule (J10 F06) are suitable for the purposes of the DCO application. The Mitigation and Monitoring schedule (REP5-024) and Marine Licence Principles Document (REP5-022) were updated at Deadline 5 to outline the commitment to the use of low order UXO clearance methods only and a seasonal restriction on low order UXO clearance in the Liverpool Bay/Bae Lerpwl SPA between 1 November and 31 March.	See comments to points NRW.HRA.36 below and NRW.OO.22 above	Agreed

1.4.8 Habitats Regulations Assessment

Table 1.11: Agreement Log between the parties on Habitats Regulations Assessment

Reference Number	Discussion point	Applicant's Position	NRW (A)'s Position	Status
Physical processes				
NRW.HRA.1	Screening	Agreement to the screening of impacts for the HRA for physical processes	NRW (A) agrees with the impacts screened into the HRA from a physical processes perspective.	Agreed
NRW.HRA.2	Assessment methodology	All European sites with physical processes features that have the potential for LSE have been identified within the HRA Stage 1 screening and considered in the Stage 2 ISAA.	NRW (A) agrees that all European sites with physical processes features that have the potential for LSE have been identified within the HRA Stage 1 screening and considered in the Stage 2 ISAA.	Agreed
NRW.HRA.3	Assessment methodology	The list of projects screened into the in-combination assessment in the HRA is appropriate.	NRW (A) agrees	Agreed
NRW.HRA.4	Study area	The HRA study area is appropriate for the receptors, sites and impacts assessed.	NRW (A) agrees	Agreed
NRW.HRA.5	Outcomes of the ISAA (Mona Offshore Wind Project alone)	There will be no adverse effects on the integrity of SACs with physical processes features for the Mona Offshore Wind Project alone.	NRW (A) agrees	Agreed
NRW.HRA.6	Outcomes of the ISAA (in-combination with other plans and projects)	There will be no adverse effects on the integrity of SACs with physical processes features for the Mona Offshore Wind Project in-combination with other plans and projects.	NRW (A) agrees	Agreed
Benthic subtidal and intertidal ecology				
NRW.HRA.7	Screening	Agreement to the screening of impacts for the HRA for benthic subtidal and intertidal ecology.	NRW (A) agrees with the scoping of impacts for the HRA for Benthic Subtidal and Intertidal Ecology.	Agreed
NRW.HRA.8	Assessment methodology	All European sites with benthic subtidal and intertidal ecology features that have the potential for LSE have been identified within the HRA Stage 1 screening and considered in the Stage 2 ISAA.	NRW (A) agrees with the approach used for determining LSE and all sites within the Zone of Influence (ZOI) have been screened in.	Agreed

Reference Number	Discussion point	Applicant's Position	NRW (A)'s Position	Status
NRW.HRA.9	Assessment methodology	The list of projects screened into the in-combination assessment in the HRA is appropriate.	NRW (A) agrees that the list of projects screened into the in-combination assessment in the HRA is appropriate.	Agreed
NRW.HRA.10	Study area	The HRA study area is appropriate for the receptors, sites and impacts assessed.	NRW (A) agrees with the regional benthic subtidal and intertidal area defined in the PEIR.	Agreed
NRW.HRA.11	Baseline environment	No Annex I habitat features of the Menai Strait and Conwy Bay SAC are present in the overlap with the Mona Offshore Cable Corridor.	NRW (A) agrees after having reviewed the Benthic Technical report that there are no Annex I features of the Menai Strait and Conwy Bay SAC present in the overlap with the Mona Offshore Cable Corridor.	Agreed
NRW.HRA.12	Assessment methodology	The approach used for determining LSE on European sites with Annex I habitats and features is appropriate	NRW (A) agrees with the approach used for determining LSE and all sites within the ZOI have been screened in.	Agreed
NRW.HRA.13	Outcomes of the ISAA (Mona Offshore Wind Project alone)	There will be no adverse effects on the integrity of SACs with benthic subtidal features for the Mona Offshore Wind Project alone.	NRW (A) agrees with the conclusions of the ISAA (APP-032), that provided the mitigation measures outlined are adhered to, the Mona Offshore Wind Project will not have an AEoSI and therefore will not undermine the conservation objectives of the benthic designated features of the Menai Strait and Conwy Bay SAC.	Agreed
NRW.HRA.14	Outcomes of the ISAA (in-combination with other plans and projects)	There will be no adverse effects on the integrity of SACs with benthic subtidal features for the Mona Offshore Wind Project in-combination with other plans and projects.	NRW (A) agrees with the conclusions of the ISAA (APP-032), that provided the mitigation measures outlined are adhered to, the Mona Offshore Wind Project will not have an AEoSI and therefore will not undermine the conservation objectives of the benthic designated features of the Menai Strait and Conwy Bay SAC.	Agreed
Fish and shellfish ecology				
NRW.HRA.15	Screening	Agreement to the screening of impacts for the HRA for fish and shellfish ecology.	NRW (A) agrees with the scoping of impacts for the EIA and HRA for Fish and Shellfish Ecology.	Agreed

Reference Number	Discussion point	Applicant's Position	NRW (A)'s Position	Status
NRW.HRA.16	Assessment methodology	All European sites with fish and shellfish ecology features that have the potential for LSE have been identified within the HRA Stage 1 screening and considered in the Stage 2 ISAA.	NRW (A) agrees that all European sites with fish and shellfish ecology features with potential for LSE have been identified.	Agreed
NRW.HRA.17	Assessment methodology	The list of projects screened into the in-combination assessment in the HRA is appropriate.	NRW (A) agrees with the screening undertaken in the HRA Screening report (APP-034).	Agreed
NRW.HRA.18	Study area	The HRA study area is appropriate for the receptors, sites and impacts assessed.	NRW (A) agrees that the HRA study area is appropriate.	Agreed
NRW.HRA.19	Assessment methodology	The approach used for determining LSE on European sites with Annex II diadromous fish as features is appropriate.	NRW (A) agrees with the approach used for determining LSE on European sites with Annex II diadromous fish.	Agreed
NRW.HRA.20	Outcomes of the ISAA (Mona Offshore Wind Project alone)	There will be no adverse effect on integrity for SACs designated for fish features for any impacts for the Mona Offshore Wind Project alone.	NRW (A) agrees with the screening undertaken in the HRA Screening report (APP-034) and the subsequent Stage 2 assessment (APP-032) and agree with the overall conclusion of no risk of an adverse effect on the integrity of diadromous fish features from the Welsh protected sites; Dee Estuary/Aber Dyfrdwy SAC, River Dee and Bala Lake/Afon Dyfrdwy a Llyn Tegid SAC, and Afon Gwyrfai a Llyn Cwellyn SAC.	Agreed
NRW.HRA.21	Outcomes of the ISAA (in-combination with other plans and projects)	There will be no adverse effect on integrity for SACs designated for fish features for any impacts for the Mona Offshore Wind Project in-combination with other projects and plans.	NRW (A) agrees with the screening undertaken in the HRA Screening report (APP-034) and the subsequent Stage 2 assessment (APP-032) and agree with the overall conclusion of no risk of an adverse effect on the integrity of diadromous fish features from the Welsh protected sites; Dee Estuary/Aber Dyfrdwy SAC, River Dee and Bala Lake/Afon Dyfrdwy a Llyn Tegid SAC, and Afon Gwyrfai a Llyn Cwellyn SAC.	Agreed
Marine mammals				
NRW.HRA.22	Screening	Agreement to the screening of impacts for the HRA for marine mammals.	NRW (A) confirms agreement to the approach for LSE Screening for Marine Mammals.	Agreed

Reference Number	Discussion point	Applicant's Position	NRW (A)'s Position	Status
NRW.HRA.23	Assessment methodology	All European sites with marine mammal features with the potential for LSE have been identified within the HRA Stage 1 screening and considered in the Stage 2 ISAA.	NRW (A) confirms agreement to the approach for LSE Screening for Marine Mammals.	Agreed
NRW.HRA.24	Assessment methodology	The list of projects screened into the in-combination assessment in the HRA is appropriate.	NRW(A) agrees with the list of projects screened into the in-combination assessment in the HRA.	Agreed
NRW.HRA.25	Study area	The HRA study area is appropriate for the receptors, sites and impacts assessed.	NRW (A) agrees with the data collected through surveys and literature including the data sources used to characterise the baseline, as well as the management unit approach adopted (APP-056).	Agreed
NRW.HRA.26	Assessment methodology	The approach used for determining LSE on European sites with Annex II marine mammals as features is appropriate, and all the relevant sites have been identified.	NRW (A) confirms agreement to the approach for LSE Screening for Marine Mammals.	Agreed
NRW.HRA.27	Assessment methodology	Agreement on the use of the area-based approach for HRA based on Effective Deterrent Range (EDR) and 143 dB threshold	NRW (A) agrees with the proposed approach for the HRA which presents results using two parallel methods: EDRs (in line with the JNCC 2020 guidance) and the modelled results for a single strike 143 dB SEL threshold (in line with the NRW 2023 position statement).	Agreed
NRW.HRA.28	Outcomes of the ISAA (Mona Offshore Wind Project alone)	There will be no adverse effects on integrity for SACs designated for marine mammal features for any impacts for the Mona Offshore Wind Project alone.	NRW(A) can confirm that we agree with the overall conclusions of the ISAA, notwithstanding any written representations raised that are currently ongoing points of discussion.	Agreed
NRW.HRA.29	Outcomes of the ISAA (in-combination with other plans and projects)	There will be no adverse effects on integrity for SACs designated for marine mammal features for any impacts for the project in-combination with other projects and plans.	NRW(A) can confirm that we agree with the overall conclusions of the ISAA in combination with other plans and projects notwithstanding any written representations raised that are currently ongoing points of discussion.	Agreed

Reference Number	Discussion point	Applicant's Position	NRW (A)'s Position	Status
Offshore ornithology				
NRW.HRA.30	Screening	Agreement to the screening of impacts for the HRA for offshore ornithology.	NRW (A) agrees with the screened impacts	Agreed
NRW.HRA.31	Screening	Agreement on the approach to identifying sites and features in the HRA Stage 1 Screening.	This is agreed, with caveats. As noted in our Relevant Representations (RR-011), the approach taken by the Applicant in this assessment may be considered appropriate regarding the project alone assessment for this particular project, where there is potential connectivity to a very large number of sites, but the likelihood of substantial impacts is generally low. It should be acknowledged however (this is where the caveat should be considered), that this approach will not necessarily be appropriate for all offshore wind cases.	Agreed with caveats
NRW.HRA.32	Screening	Agreement on approach to HRA Stage 1 Screening using outputs for CRM, displacement assessment and associated apportioning.	This is agreed, with caveats. As was noted during the EWG, NRW consider LSE is a coarse screening filter, should be simple, and if further evidence is brought in, then effectively this should be part of the Appropriate Assessment (AA). This provides a transparent approach that can be followed through the ISAA. NRW (A) would therefore expect all sites where a qualifying feature has been recorded on the development site and where there is potential connectivity (e.g. within foraging range) and a potential impact pathway (e.g. displacement or collision) and hence the potential to undermine the conservation objectives for the feature, to be carried through to the AA phase. Any additional work looking at e.g. apportioning impacts and assessments of predicted impacts against baseline mortality etc. should be included in the AA. However, following discussions with the Applicant during the EWG, a compromise solution was reached, which is the approach taken in the assessment. As noted on point NRW.HRA.31 above, the approach taken by	Agreed with caveats

Reference Number	Discussion point	Applicant's Position	NRW (A)'s Position	Status
			the Applicant may be considered appropriate for this project alone. It should be acknowledged however (this is where the caveat should be considered), that this approach will not necessarily be appropriate for all offshore wind cases.	
NRW.HRA.33	Assessment methodology	All European sites with offshore ornithology features with the potential for LSE have been identified within the HRA Stage 1 screening and considered in the Stage 2 ISAA. The Applicant provided the following updated HRA documents at Deadline 2: • HRA Stage 1 Screening Report (REP2-012/013) • HRA Stage 2 Information to Support an Appropriate Assessment Part Three: Special Protection Areas and Ramsar sites Assessments (REP2-010/011) The Applicant also provided further information at Deadline 4 (see Offshore Ornithology Supporting Information in line with SNCB advice' (REP4-030)) with respect to Atlantic puffin following feedback received in a meeting with NRW (A) on 14 October 2024.	Following the Applicant's Deadline 4 submissions [REP4-030], we agree that all Welsh designated sites with offshore ornithology features with the potential for LSE have been identified and assessed.	Agreed
NRW.HRA.34	Assessment methodology	The list of projects screened into the in-combination assessment in the HRA is appropriate.	As per NRW (A)'s response to Q1.10.14 (REP3-093), NRW (A) are content with the projects included in the HRA in-combination assessments. Following the Applicant's gap-filling of historical projects and inclusion of these in the in-combination assessments, together with the updates to the Morgan and Morecambe Generation Assets figures and inclusion of Llyr 1 in the updated assessments at Deadline 5 [REP5-074], we are content with the projects screened into the HRA in-combination assessments.	Agreed

Reference Number	Discussion point	Applicant's Position	NRW (A)'s Position	Status
NRW.HRA.35	Study area	The HRA study area is appropriate for the receptors, sites and impacts assessed. The Applicant provided the following updated HRA documents at Deadline 2: • HRA Stage 1 Screening Report (REP2-012/013) • HRA Stage 2 Information to Support an Appropriate Assessment Part Three: Special Protection Areas and Ramsar sites Assessments (REP2-010/011) The Applicant also provided further information at Deadline 4 (see Offshore Ornithology Supporting Information in line with SNCB advice' (REP4-030)). At Deadline 5, the Applicant submitted a Summary of Principal Offshore Ornithological Matters (REP5-072) and Offshore ornithology additional supporting in-combination assessment information in line with SNCB advice (REP5-074) to address NRW (A)'s comments on the Deadline 4 submissions.	Following the updates made by the Applicant during the examination, NRW (A) agrees with the data collected through surveys and literature including the data sources used to characterise the baseline; we agree with the receptors; and we agree with the impacts assessed.	Agreed

Reference Number	Discussion point	Applicant's Position	NRW (A)'s Position	Status
NRW.HRA.36	Mitigation and monitoring	As outlined in the Mitigation and Monitoring Schedule (J10 F06) and Measures to minimise disturbance to marine mammals and rafting birds from transiting vessels (REP5-030), the Applicant has committed to a timing restriction of no offshore export cable installation or UXO clearance activities during the period 1 November to 31 March within the Liverpool Bay/Bae Lerpwl SPA. As set out in the Marine Licence Principles Document (REP5-022), this commitment is expected to be secured via the standalone NRW marine licence. The Applicant provided updated Measures to minimise disturbance to marine mammals and rafting birds from transiting vessels (REP5-030) at Deadline 5, to provide clarity on which mitigation measures relate to which vessel activity.	Following the Applicant's Deadline 5 commitment to the application of the seasonal restriction to works within the SPA for both export cable installation activities and UXO clearance, the other measures contained within REP5-030 to further reduce disturbance to rafting birds, combined with the low and temporary impact of remaining pre-commencement activities, NRW (A) can now agree that this is appropriate to mitigate AEoSI from disturbance on red throated diver and common scoter features of Liverpool Bay SPA. Further detail on this can be found in our Deadline 6 response.	Agreed
NRW.HRA.37	Outcomes of the ISAA (Mona Offshore Wind Project alone)	There will be no adverse effect on integrity for Welsh SPAs designated for offshore ornithology features for any impacts from the Mona Offshore Wind Project alone. The Applicant provided the following updated HRA documents at Deadline 2: • HRA Stage 1 Screening Report (REP2-012/013) • HRA Stage 2 Information to Support an Appropriate Assessment Part Three: Special Protection Areas and Ramsar sites Assessments (REP2-010/011) The Applicant also provided further information at Deadline 3 (see Offshore Ornithology Supporting Information in line with SNCB advice REP3-059) and Deadline 4 (see Offshore Ornithology Supporting Information in line with SNCB advice' (REP4-030)) which provides additional assessments considering a range-based approach	Following the Applicant's updates at Deadline 3 [REP3-059], Deadline 4 [REP4-030] and the updates commitments at Deadline 5 regarding UXO clearance and inclusion of this within the seasonal timing restriction (as set out in REP5-030), we can agree that there will be no AEoSI for all relevant Welsh SPAs from the project alone (see our responses in Appendix 1 of Annex B of REP4-105 and Section 4 of Appendix 2 of REP6-137 for further details).	Agreed

Reference Number	Discussion point	Applicant's Position	NRW (A)'s Position	Status
		as requested by NRW(A). The conclusions of the Deadline 2 and Deadline 4 submissions are that there is no AEoSI for SPAs designated for offshore ornithology features for any impacts for the Mona Offshore Wind Project alone.		
NRW.HRA.38	Outcomes of the ISAA (in-combination with other projects and plans)	There will be no adverse effect on integrity for Welsh SPAs designated for offshore ornithology features for any impacts from the Mona Offshore Wind Project in-combination with other projects and plans. The Applicant provided the following updated HRA documents at Deadline 2. • HRA Stage 1 Screening Report (REP2-012/013) • HRA Stage 2 Information to Support an Appropriate Assessment Part Three: Special Protection Areas and Ramsar sites Assessments (REP2-010/011) The Applicant also provided an 'Offshore Ornithology Supporting Information in line with SNCB advice' (REP4-030) at Deadline 4, which provides additional assessments considering a range-based approach as requested by NRW(A) and Gap-filling Historical Projects Technical Note (REP4-029) submitted at Deadline 4, which follows the SNCB methodology for quantifying impacts from historical projects. At Deadline 5 the Applicant submitted a Summary of Principal Offshore Ornithological Matters (REP5-072) and Offshore ornithology additional supporting in-combination assessment information in line with SNCB advice (REP5-074) to address NRW(A) comments on the Deadline 4 submissions. An Update on offshore ornithology principal matters (REP6-098) was also provided at Deadline 6.	Following the Applicant's updates during the examination, and particularly those submitted at Deadlines 4 and 5 [REP4-028, REP4-030, REP5-030 and REP5-074], we can agree that there will be no AEoSI for the following features of the following Welsh SPAs from the project in-combination: • Skomer, Skokholm & seas off Pembrokeshire SPA: Manx shearwater, lesser black-backed gull, puffin, European storm petrel, seabird assemblage (including named components of guillemot, razorbill and kittiwake); • Aberdaron Coast & Bardsey Island SPA: Manx shearwater; • Liverpool Bay SPA: red-throated diver, common scoter Please see Appendix 2 of REP6-137 for further details. We note however that the Applicant intends to submit an updated HRA Assessment at Deadline 7, incorporating figures from two historical wind farms - Barrow and North Hoyle. The Applicant provided the updated figures concluded in this assessment to NRW (A) via email on 8 January 2025. We note the updated in-combination numbers the Applicant intends to submit would not change our conclusions made for all species and site/feature combinations for Welsh SPAs made in our D6 response (REP6-137). Therefore, subject to these figures being identical to those submitted as part of the updated HRA at Deadline	Agreed with caveats

Reference Number	Discussion point	Applicant's Position	NRW (A)'s Position	Status
		A consolidation exercise has been undertaken at Deadline 7 to bring all the relevant examination materials into the HRA Stage 2 ISAA Part Three: SPAs and Ramsar sites Assessments (E1.3 F03). The relevant updated information was shared with NRW via email on 8 January 2025 ahead of Deadline 7. The conclusions of these submissions are that there is no adverse effect on integrity for SPAs designated for offshore ornithology features for any impacts for the Mona Offshore Wind Project in-combination with other projects and plans.	7, we maintain our position above that we can agree that there will be no AEoSI for the features named above from the project in-combination. However, our advice may change should the updated assessments submitted by the Applicant at Deadline 7 differ from that presented to us on 8 January 2025.	
NRW.HRA.39	Outcomes of the ISAA (in-combination with other projects and plans)	There will be no AEoSI for the northern gannet feature of the Grassholm SPA for any impacts from the Mona Offshore Wind Project in-combination with other projects and plans. See the Applicant's position in row NRW.HRA.38 above for the updated information which has formed the Applicant's position on this matter. The Applicant and NRW(A) have undertaken further engagement between Deadline 5 and 6 on 16 December 2024 with regard to northern gannet at Grassholm SPA and have provided the additional information requested (including PVAs) at Deadline 6 (see Revised Assessment for northern gannet at Grassholm SPA (REP6-088)) to allow NRW (A) to confirm their position on adverse effects on site integrity.	Following the Applicant's revised assessment for northern gannet at Grassholm SPA [REP6-088], we can agree that there will be no AEoSI for the gannet feature of the SPA from the project in-combination. Please see our Deadline 7 response for further details.	Agreed