

# MONA OFFSHORE WIND PROJECT

## Mona and Natural Resource Wales (advisory) Onshore SoCG

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Image of an offshore wind farm

**MONA OFFSHORE WIND PROJECT**

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**Prepared by:**


**RPS**

**Prepared for:**

**Mona Offshore Wind Ltd.**

**Signatories**

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

Signed	
Name	Paul Carter
Date	14.01.2025
Position	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
CoCP	Code of Construction Practice
DCO	Development Consent Order
dDCO	Draft Development Consent Order
EIA	Environmental Impact Assessment
EWG	Expert Working Group
ExA	Examining Authority
HRA	Habitats Regulations Assessment
IAQM	Institute of Air Quality Management
ISAA	Information to Support Appropriate Assessment
LSE	Likely Significant Effect
MHWS	Mean High Water Springs
MLWS	Mean Low Water Springs
NL	National Landscape
NRW (A)	Natural Resources Wales Advisory
NRW (MLT)	Natural Resource Wales Marine Licensing Team
PEIR	Preliminary Environmental Information Report
PWS	Private Groundwater Supply Source
SAC	Special Area of Conservation
SLVIA	Seascape, landscape and visual impact assessment
SoCG	Statement of Common Ground

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Acronym	Description
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 - Onshore

## 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, disagreement and in that context, matters of ongoing discussion 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 will identify where agreement has been reached, where differences lie and the reasons for disagreement or outstanding matters and will facilitate further discussion between the parties. The SoCG will be updated during the Mona Offshore Wind Project Examination.

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

- Onshore
- Offshore
- 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 1.1.2.6.

1.1.1.6 The Applicant has engaged with NRW (A) on these SoCGs for Deadline 1 however the Applicant and NRW (A) acknowledge that additional work is required on the SoCGs as the Examination progresses.

### 1.1.2 Mona Offshore Wind Project Elements under NRW's Remit

1.1.2.1 NRW's remit, as set out in the 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 (PDA-003).

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.

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- 1.1.2.3 NRW (A)'s main function in relation to terrestrial development is as an advisor and statutory consultee.
- 1.1.2.4 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 Marine Licensing Function.
- 1.1.2.5 This SoCG covers the onshore elements of the scheme landward of Mean High-Water Springs (MHWS). In relation to the DCO regime, NRW (A)'s responsibilities have included engagement 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.
- 1.1.2.6 This SoCG covers the following onshore technical topics of the DCO application which are of relevance to NRW (A):
- Geology, hydrogeology and ground conditions
  - Hydrology and flood risk
  - Onshore ecology (including onshore and intertidal ornithology)
  - Air quality
  - Materials and waste
  - Water Framework Directive – surface water and groundwater.

### 1.1.3 Overview of Mona Offshore Wind Project

- 1.1.3.1 The Applicant has submitted an application for a Development Consent Order 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 LAT of 364 m, 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 Mean High Water Springs (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

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- **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 phases of the Mona Offshore Wind Project is available in 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 pre-examination phase and will be 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 during the post-application phase (i.e. relevant representations and pre-examination meetings).

1.1.4.2 In accordance with discussions between the Applicant and NRW (A), the SoCG is focused on the topics listed in paragraph 1.1.2.6.

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 during the pre-application and post-application phase of the Mona Offshore Wind Project. The agreement logs present the position reached on 07 August 2024 (Deadline 1).

**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 point 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
Geology, hydrogeology and ground conditions	The matter is considered to be agreed between the parties.
Hydrology and flood risk	The matter is considered to be agreed between the parties.



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Topic	Agreement status
Water framework directive – surface water and groundwater	The matter is considered to be agreed between the parties.
Onshore ecology (including onshore and intertidal ornithology)	The matter is considered to be agreed between the parties.
Air quality	The matter is considered to be agreed between the parties.
Materials and waste	The matter is considered to be agreed between the parties.

**1.3 Summary of consultation**

1.3.1.1 Table 1.2 below provides a brief overview of the consultation undertaken by the Applicant with NRW during the pre-application (both statutory and non-statutory) phases of the Mona Offshore Wind Project. Table 1.3 below provides a summary of the consultation undertaken by the Applicant with NRW 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.

1.3.1.2 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).

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

Date	Form of consultation	Statutory or non-statutory engagement	Summary of consultation
<b>Scoping</b>			
15 June 2022	Scoping Opinion	Statutory	• Issue of Scoping Opinion (APP-194)
<b>Statutory (Section 42) consultation</b>			
04 June 2023	Statutory consultation	Statutory	• Statutory consultation responses from NRW are presented in Consultation Report Appendices – Part 3 (D.25-F) (APP-040).

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<b>Date</b>	<b>Form of consultation</b>	<b>Statutory or non-statutory engagement</b>	<b>Summary of consultation</b>
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**Evidence Plan steering group**

14 December 2021	Meeting	Non-statutory	<ul style="list-style-type: none"> <li>• Introduce the cable route selection study</li> <li>• To procure high level feedback on the cable routing process</li> <li>• To identify any concerns.</li> </ul>
20 July 2022	Meeting	Non-statutory	<ul style="list-style-type: none"> <li>• Approach to cable route selection</li> <li>• Likely Significant Effect (LSE) screening methodology</li> <li>• Opportunities to discuss points from the Scoping Opinion.</li> </ul>
14 February 2023	Meeting	Non-statutory	<ul style="list-style-type: none"> <li>• Habitats Regulations Assessment (HRA) Stage 1 Screening and Information to Support Appropriate Assessment (ISAA) methodology</li> <li>• Consultation on the Preliminary Environmental Information Report (PEIR) and building towards the SoCGs</li> <li>• Cable route site selection study updates</li> <li>• Engineering considerations towards Special Areas of Conservation (SACs).</li> </ul>
29 June 2023	Meeting	Non-statutory	<ul style="list-style-type: none"> <li>• HRA Stage 1 Screening and ISAA methodology</li> <li>• Section 42 responses</li> <li>• Agreement logs.</li> </ul>
17 October 2023	Meeting	Non-statutory	<ul style="list-style-type: none"> <li>• HRA Stage 1 Screening and ISAA methodology</li> <li>• Underwater Sound Management Strategy</li> <li>• Agreement logs.</li> </ul>

**Evidence Plan onshore ecology EWG (including onshore and intertidal ornithology)**

16 June 2022	Meeting	Non-statutory	<ul style="list-style-type: none"> <li>• Introduce and gain feedback on Evidence Plan</li> <li>• Discuss Natural England and NRW Advisory comments on the survey scopes to date (i.e. prior to Evidence Plan) and the survey strategy</li> <li>• Update on the progress of surveys and data analysis.</li> </ul>
08 December 2022	Meeting	Non-statutory	<ul style="list-style-type: none"> <li>• Meeting to agree the approach to baseline characterisation, including relevant study areas</li> <li>• Discuss comments within Scoping Opinion</li> <li>• Discuss approach to the PEIR</li> <li>• Update on progress of surveys.</li> </ul>
24 April 2023	Meeting	Non-statutory	<ul style="list-style-type: none"> <li>• Meeting to discuss the methodologies and proposed locations of the protected species surveys</li> <li>• Discuss assumptions on presence/absence of key receptor species</li> <li>• Meeting to discuss approach to biodiversity benefit requirements.</li> </ul>

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<b>Date</b>	<b>Form of consultation</b>	<b>Statutory or non-statutory engagement</b>	<b>Summary of consultation</b>
19 July 2023	Meeting	Non-statutory	<ul style="list-style-type: none"> <li>• Discussed key technical, engineering, and environmental work undertaken following the previous EWG, including key design changes since publication of the PEIR</li> <li>• Discussed the approach to onshore ecology and onshore and intertidal ornithology surveys, including the survey programme, survey progress to date and notable interim survey results</li> <li>• Discussed mitigation requirements, including measures to be incorporated into the Outline Code of Construction Practice (APP-212), Outline Landscape and Ecological Management Plan (APP-208)</li> <li>• Discussed relevant consultation responses received in response to statutory consultation (section 42) and how these would be considered.</li> </ul>
04 October 2023	Meeting	Non-statutory	<ul style="list-style-type: none"> <li>• Discussed key technical, engineering, and environmental work undertaken, including key design changes since the previous EWG</li> <li>• Discussed the approach to onshore ecology and onshore and intertidal ornithology surveys, including the survey programme, survey progress to date and notable interim survey results</li> <li>• Discussed mitigation requirements, including measures to be incorporated into the Outline Code of Construction Practice (APP-212), Outline Landscape and Ecological Management Plan (APP-208)</li> <li>• Discussed the approach to landscape and ecology planting at the Onshore Substation, including key design/environmental constraints and visualisations.</li> </ul>
08 December 2023	Meeting	Non-statutory	<ul style="list-style-type: none"> <li>• Discussed key technical, engineering, and environmental work undertaken, including key design changes since the previous EWG</li> <li>• Discussed the approach to onshore ecology and onshore and intertidal ornithology surveys, including the survey programme, survey progress to date and notable interim survey results</li> <li>• Discussed mitigation requirements, including measures to be incorporated into the Outline Code of Construction Practice (APP-212) and Outline Landscape and Ecological Management Plan (APP-208).</li> </ul>

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Date	Form of consultation	Statutory or non-statutory engagement	Summary of consultation
<b>Hydrology and flood risk</b>			
7 June 2023	Meeting	Non-statutory	<ul style="list-style-type: none"> <li>• Discussion of Hydrology and flood risk EWG remit and way of working</li> <li>• Discussion of desk top sources for baseline characterisation</li> <li>• Discussion of Hydrology and flood risk constraints</li> <li>• Discussion of coastal flood defences</li> <li>• Discussion of approach of drainage strategy for Onshore substation.</li> </ul>

1.3.1.3 No pre-application consultation was undertaken with NRW regarding geology, hydrogeology and ground conditions.

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

Date	Form of consultation	Statutory or non-statutory engagement	Summary of consultation
5 March 2024	Meeting	Non-statutory	<ul style="list-style-type: none"> <li>• Discuss the methodology and approach for the 2024 onshore ecology surveys for Great crested newts and bats.</li> </ul>
10 May 2024	Relevant representation	Statutory	<ul style="list-style-type: none"> <li>• Provision of NRW's relevant representation (RR-011).</li> </ul>
15 May 2024	Meeting (Onshore Ecology EWG07)	Non-statutory	<ul style="list-style-type: none"> <li>• Summarise key information in the application</li> <li>• Discuss assumed consent timeline.</li> </ul>
25 June 2024	Applicant's response to NRW's relevant representation	Statutory	<ul style="list-style-type: none"> <li>• Provision of the Applicant's response to NRW's relevant representation at the Procedural Deadline (PDA-008 to PDA-019).</li> </ul>
7 August 2024	Written Representation	Statutory	<ul style="list-style-type: none"> <li>• Provision of NRW's written representation for Deadline 1 (REP1-056)</li> </ul>
27 August 2024	Written Submission	Statutory	<ul style="list-style-type: none"> <li>• Provision of updated Outline Landscape and Ecology Management Plan (REP2-034)</li> </ul>
27 August 2024	Applicant's response to NRW's written representation	Statutory	<ul style="list-style-type: none"> <li>• Provision of the Applicant's response to NRW's written representation at Deadline 2 (REP2-080)</li> </ul>
30 September 2024	Written Submission	Statutory	<ul style="list-style-type: none"> <li>• Provision of NRW's written submission for Deadline 3 (REP3-090)</li> <li>• Provision of National Culverts Study (REP3-092)</li> </ul>
11 October 2024	Meeting	Non-statutory	<ul style="list-style-type: none"> <li>• Discuss the photography survey undertaken of the watercourses that will be crossed by the Onshore Cable Corridor and the collated information from the Environmental Statement and site observations regarding geomorphology conditions</li> </ul>

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<b>Date</b>	<b>Form of consultation</b>	<b>Statutory or non-statutory engagement</b>	<b>Summary of consultation</b>
4 November 2024	Applicant's response to NRW's D3 Submission	Statutory	<ul style="list-style-type: none"> <li>• Provision of Applicant's response to NRW's written submission for Deadline 3 (REP4-047)</li> </ul>
4 November 2024	Written Submission	Statutory	<ul style="list-style-type: none"> <li>• Provision of Geomorphology Clarification Note at Deadline 4 (REP4-040)</li> </ul>
4 November 2024	Written Submission	Statutory	<ul style="list-style-type: none"> <li>• NRW comments on submissions received at Deadline 3 (REP4-105)</li> </ul>
3 December 2024	Applicant's response to NRW's D3 and D4 submissions	Statutory	<ul style="list-style-type: none"> <li>• Provision of Applicant's response to NRW's written submission for Deadline 3 on ecology (terrestrial) (REP5-059)</li> <li>• Provision of the Applicant's response to NRW's written submission for Deadline 4 (REP5-061)</li> </ul>
3 December 2024	Written Submission	Statutory	<ul style="list-style-type: none"> <li>• Provision of NRW's written submission for Deadline 5 (REP5-098)</li> </ul>

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**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, 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.
Not agreed – but 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, assessment conclusions in either Environmental Impact Assessment (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 1.10 set out the level of agreement between the parties for each relevant component of the application (as identified in section 1.1.2).

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1.4.2 Geology, hydrogeology and ground conditions

Table 1.5: Agreement Log between the parties on Geology, hydrogeology and ground conditions.

Reference Number	Discussion point	Applicant's Position	NRWs Position	Status
<b>EIA</b>				
NRW.GHGC.1	Consultation	The Applicant has undertaken adequate consultation with potential impacts on geology, hydrogeology and ground conditions.	NRW (A) agrees that the Applicant has undertaken adequate consultation with potential impacts on geology, hydrogeology and ground conditions.	Agreed
NRW.GHGC.2	Consultation	The EIA has had due regard to matters raised by NRW through statutory and non-statutory consultation on geology, hydrogeology and ground conditions.	NRW (A) agrees that the EIA has had due regard to matters raised by NRW through statutory and non-statutory consultation on geology, hydrogeology and ground conditions.	Agreed
NRW.GHGC.3	Policy and planning	The Application has identified and considered all plans and policies relevant to geology, hydrogeology and ground conditions, within NRW's remit.	NRW (A) agrees that the Application has identified and considered all plans and policies relevant to geology, hydrogeology and ground conditions, within NRW's remit.	Agreed
NRW.GHGC.4	Surveys	Agreement that desk -based information is adequate to characterise the baseline and that site-specific surveys are not required	No further comments provided by NRW. Source: NRW's section 42 response on 01 June 2023.	Agreed
NRW.GHGC.5	Baseline environment	Agreement on baseline characterisation of geology, hydrogeology and ground conditions.  Measures to mitigate against the risk to private groundwater supplies will be implemented in accordance with the hierarchy set out in paragraph 1.10.4.9 of the Outline Code of Construction Practice (REP4-024). The Applicant has undertaken site visits of the PWS locations considered to the highest risk as identified in Volume 7, Annex 1.2: Groundwater sources of supply – hydrogeological risk assessment (APP-116) and is preparing specific Hydrogeological Risk Assessment for these locations.	NRW (A) agrees with characterisation of baseline geology and ground conditions receptors.	Agreed

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Reference Number	Discussion point	Applicant's Position	NRWs Position	Status
NRW.GHGC.6	Study area	The study area is appropriate for the impacts and receptors assessed	No further comments provided by NRW. Source: NRW's section 42 response on 01 June 2023.	Agreed
NRW.GHGC.7	Assessment methodology	Agreement on the assessment methodology	NRW (A) agrees on the assessment methodology.	Agreed
NRW.GHGC.8	Assessment of the effects from the Mona Offshore Wind Project alone	There will be no significant effects on geology, hydrogeology and ground conditions in EIA terms.	NRW (A) agrees that there will be no significant effects on geology, hydrogeology and ground conditions in EIA terms.	Agreed
NRW.GHGC.9	Assessment of the effects from the Mona Offshore Wind Project cumulatively with other projects	There will be no significant effects on geology, hydrogeology and ground conditions cumulatively with other projects and plans	NRW (A) agrees that there will be no significant effects on geology, hydrogeology and ground conditions in EIA terms.	Agreed
NRW.GHGC.10	Mitigation	The mitigation measures and conditions outlined in Volume 3, Chapter 1: Geology, hydrogeology and ground conditions (APP-064) and the Mitigation and Monitoring schedule (APP-196) are appropriate and will ensure significant effects are avoided. The Applicant is committed to engaging with the owners of PWSs to design the measure to mitigate risks as outlined in the Outline Code of Construction Practice.	NRW (A) agrees in principle and notes the commitment to engage with PWS owners.	Agreed
<b>Other Documents and Plans</b>				
NRW.GHGC.11	Outline Management Plans	The method of trenchless technique that will be used at the landfall and crossings along the Mona Onshore Cable Corridor will be confirmed during detailed design. This will be summarised in the detailed Landfall Construction Method Statement and the Onshore Construction Method Statement that will form part of the Code of Construction Practice (CoCP) (APP-212).	NRW (A) agrees with the mitigation measures and conditions outlined.	Agreed



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Reference Number	Discussion point	Applicant's Position	NRWs Position	Status
NRW.GHGC.13	Outline Management Plans	The Outline CoCP (APP-212) and the accompanying outline management plans are secured through the DCO (PDA-003) and appropriate with regard to proposed mitigation measures and monitoring.	NRW (A) agrees with the Outline CoCP.	Agreed

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**1.4.3 Hydrology and flood risk**

**Table 1.6: Agreement Log between the parties on Hydrology and flood risk.**

Reference Number	Discussion point	Applicant's Position	NRWs Position	Status
<b>EIA</b>				
NRW.HFR.1	Consultation	The Applicant has undertaken adequate consultation with potential impacts on hydrology and flood risk.	NRW (A) agrees the Applicant has undertaken adequate consultation with potential impacts on hydrology and flood risk.	Agreed
NRW.HFR.2	Consultation	The EIA has had due regard to matters raised by NRW through statutory and non-statutory consultation on hydrology and flood risk.	NRW (A) agrees that the EIA has had due regard to matters raised by NRW through statutory and non-statutory consultation on hydrology and flood risk.	Agreed
NRW.HFR.3	Policy and planning	The Application has identified and considered all plans and policies relevant to hydrology and flood risk, within NRW's remit.	NRW (A) agrees that the Application has identified and considered all plans and policies relevant to hydrology and flood risk, within NRW's remit.	Agreed
NRW.HFR.4	Baseline environment	Agreement on the baseline characterisation of hydrology and flood risk	NRW (A) agrees on the baseline characterisation of hydrology and flood risk	Agreed
NRW.HFR.5	Study area	The study area is appropriate for the impacts and the receptors assessed	Source: NRW's section 42 response on 01 June 2023.	Agreed
NRW.HFR.6	Assessment methodology	Agreement on the assessment methodology	NRW (A) agrees on the assessment methodology.	Agreed
NRW.HFR.7	Assessment of the effects from the Mona Offshore Wind Project alone	There will be no significant effects on hydrology and flood risk in EIA terms	NRW (A) agrees there will be no significant effects on hydrology and flood risk in EIA terms.	Agreed
NRW.HFR.8	Assessment of the effects from the Mona Offshore Wind Project cumulatively with other projects	There will be no significant effects on hydrology and flood risk cumulatively with other projects and plans	NRW (A) agrees there will be no significant effects on hydrology and flood risk cumulatively with other projects and plans.	Agreed

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Reference Number	Discussion point	Applicant's Position	NRWs Position	Status
NRW.HFR.9	Mitigation	The mitigation measures and conditions outlined in Volume 3, Chapter 2: Hydrology and flood risk (APP-065) and the Mitigation and Monitoring schedule (APP-196) are appropriate and will ensure significant effects are avoided	NRW (A) agrees with the mitigation measures and conditions outlined.	Agreed
<b>Other Documents and Plans</b>				
NRW.HFR.10	Outline Management Plans	The Outline CoCP (APP-212) and the accompanying outline management plans are secured through the DCO (PDA-003) and are appropriate with regard to proposed mitigation measures and monitoring.	NRW (A) agrees with the Outline CoCP.	Agreed

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1.4.4 Water Framework Directive compliance – surface water and groundwater

Table 1.7: Agreement Log between the parties on Water Framework Directive – surface water and groundwater.

Reference Number	Discussion point	Applicant's Position	NRWs Position	Status
NRW.WFDS.1	Baseline environment	<p>Agreement on the baseline characterisation of the Water Framework Directive (WFD) water bodies in the Water Framework Directive surface water and groundwater assessment (APP-120).</p> <p>The Applicant provided a geomorphological clarification note at Deadline 4 which included photographs of the watercourses. The photographs and geomorphological information for each watercourse was discussed at a meeting with NRW on 9 October 2024.</p>	NRW (A) agrees on the baseline characterisation of the WFD water bodies.	Agreed
NRW.HFR.2	Project design envelope	<p>The WFD compliance assessment (APP-120) has identified, described and assessed the maximum design scenario for the EIA.</p> <p>The geomorphological clarification note demonstrates that the Applicant has assessed the maximum design scenario in Volume 7, Annex 2.4: Water Framework Directive Surface Water and Groundwater Assessment (APP-120).</p>	NRW (A) agrees that the WFD compliance assessment (APP-120) has identified, described and assessed the maximum design scenario for the EIA.	Agreed
NRW.HFR.3a	Assessment of the effects from the Mona Offshore Wind Project alone – Bathing waters	<p>There will be no risk of deterioration in status or the prevention of achieving objectives for the relevant waterbodies and the protected water bodies objectives will not be compromised.</p> <p>The Applicant responded to this point (REP1-056.240) and has considered the potential impact to these bathing waters (REP2-080).</p>	NRW (A) agrees there will be no risk of deterioration in status or the prevention of achieving objectives for the relevant waterbodies and the protected water bodies objectives will not be compromised.	Agreed

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Reference Number	Discussion point	Applicant's Position	NRWs Position	Status
NRW.HFR.3b	Assessment of the effects from the Mona Offshore Wind Project alone –  Watercourse crossings	The Applicant has confirmed that the design of the watercourse crossings at each location will follow the approach set out in the National Culverts Study (NRW, 2022) (as stated in the Outline Onshore Construction Method Statement (REP4-020)	NRW (A) notes and agrees with the commitment that the design of the watercourse crossings at each location will follow the approach set out in the National Culverts Study (NRW, 2022) (as stated in the Outline Onshore Construction Method Statement (REP4-020)	Agreed
NRW.HFR.4	Assessment of the effects from the Mona Offshore Wind Project cumulatively with other projects	There will be no significant effects on the status of the relevant waterbodies or prevention of achieving objectives cumulatively with other projects and plans.	NRW (A) agrees there will be no significant effects on the status of the relevant waterbodies or prevention of achieving objectives cumulatively with other projects and plans.	Agreed
NRW.HFR.5	Mitigation and monitoring	The mitigation measures and conditions outlined in Volume 3, Chapter 2: Hydrology and flood risk (APP-065) and the Mitigation and Monitoring schedule (APP-196) are appropriate and will ensure significant effects are avoided.  The Outline Onshore Construction Statement (REP4-020) has been updated to include the commitment that the design of the watercourse crossings at each location will follow the approach set out in the National Culverts Study (NRW, 2022). The Onshore Construction Statement forms part of the Code of Construction Practice which is secured in the DCO.	NRW (A) agrees with the mitigation measures and conditions outlined.	Agreed

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**1.4.5 Onshore ecology (including onshore and intertidal ornithology)**

**Table 1.8: Agreement Log between the parties on Onshore ecology (including onshore and intertidal ornithology).**

Reference Number	Discussion point	Applicant's Position	NRWs Position	Status
<b>EIA</b>				
NRW.OE.1	Consultation	The Applicant has undertaken adequate consultation with potential impacts on onshore ecology (include onshore and intertidal ornithology).	NRW (A) agrees that the applicant has undertaken adequate consultation with potential impacts on onshore ecology (include onshore and intertidal ornithology).	Agreed
NRW.OE.2	Consultation	The EIA has had due regard to matters raised by NRW through statutory and non-statutory consultation on onshore ecology (including onshore and intertidal ornithology)	NRW (A) agrees that the EIA has had due regard to matters raised by NRW through statutory and non-statutory consultation on onshore ecology (including onshore and intertidal ornithology)	Agreed
NRW.OE.3	Policy and planning	The Application has identified and considered all plans and policies relevant to onshore ecology (including onshore and intertidal ornithology), within NRW's remit.	NRW (A) agrees that the Application has identified and considered all plans and policies relevant to onshore ecology (including onshore and intertidal ornithology), within NRW's remit.	Agreed
NRW.OE.4	Surveys	Agreement on the survey methodologies.	NRW (A) agrees on the survey methodologies.	Agreed
NRW.OE.5	Surveys	Agreement that population size class assessment surveys of great crested newts do not have to be undertaken for ponds subject to ongoing monitoring (e.g. Burbo Bank mitigation ponds) or ponds that have been surveyed within the last two years (by the time of the Mona Offshore Wind Project DCO application.	In agreement on the basis that the extant surveys are carried out in accordance the European Protected Species (EPS) licences. Source: Onshore Ecology Expert Working Group 3 (24 April 2023)	Agreed
NRW.OE.6	Baseline environment	Agreement on the baseline characterisation of onshore ecology	NRW (A) agrees on the baseline characterisation of onshore ecology.	Agreed
NRW.OE.7	Baseline environment	Agreement on the baseline characterisation of onshore and intertidal ornithology.	NRW (A) agrees on the baseline characterisation of onshore and intertidal ornithology.	Agreed
NRW.OE.8	Study area	The study area is appropriate for the impacts and receptors assessed	NRW (A) agrees that the study area is appropriate for the impacts and receptors assessed.	Agreed
NRW.OE.9	Assessment methodology	Agreement on the assessment methodology	NRW (A) agrees on the assessment methodology	Agreed

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Reference Number	Discussion point	Applicant's Position	NRWs Position	Status
NRW.OE.10	Assessment of the effects from the Mona Offshore Wind Project alone	There will be no significant effects on onshore ecology (including onshore ecology and intertidal ornithology).	NRW (A) agrees there will be no significant effects on onshore ecology (including onshore ecology and intertidal ornithology).	Agreed
NRW.OE.11	Assessment of the effects from the Mona Offshore Wind Project cumulatively with other projects	There will be no significant effects on onshore ecology (including onshore and intertidal ornithology) cumulatively with other projects and plans	NRW (A) agrees there will be no significant effects on onshore ecology (including onshore ecology and intertidal ornithology) cumulatively with other projects and plans.	Agreed
NRW.OE.12	Mitigation and monitoring	The mitigation measures and conditions outlined in Volume 3, Chapter 3: Onshore ecology (APP-066), Volume 3, Chapter 4: Onshore and intertidal ecology (APP-067), the Mitigation and Monitoring schedule (APP-196) and the Outline Landscape and Ecology Management Plan (APP-208) are appropriate and will ensure significant effects are avoided	NRW (A) agrees with the recommendations and proposed principles for mitigation. Source: NRW's section 42 response on 01 June 2023.	Agreed

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Reference Number	Discussion point	Applicant's Position	NRWs Position	Status
<b>Other Documents and Plans</b>				
NRW.OE.13	Outline Management Plans	<p>The measures set out in the Outline Landscape and Ecology Management Plan (APP-208) and the accompanying Bird Protection Plan and Great Crested Newt Mitigation Plan are secured through the dDCO (PDA-003) and are appropriate with regard to proposed mitigation measures and monitoring.</p> <p>The Applicant has made updates to the Outline LEMP at Deadline 2 (REP2-034) to include:</p> <ul style="list-style-type: none"> <li>• Clarification on the monitoring and maintenance period for landscape planting</li> <li>• A commitment to consult NRW on the timescales for long term monitoring and maintenance</li> <li>• The preparation of monitoring reports to confirm the status of habitats and protected species</li> <li>• To undertake compliance audits to confirm that the mitigation is being implemented appropriately. .</li> </ul> <p>The pre-construction surveys of Schedule 1 bird species (as part of the onshore site preparation works) were amended to specifically reference barn owls.</p> <p>The Applicant has also updated the Outline LEMP at Deadline 5 (REP5-034) to include the commitment that habitats created or enhanced to provide ecological mitigation (as assessed in Volume 3, Chapter 3: Onshore ecology (APP-066)) or provide biodiversity benefit at the Onshore Substation (as per Appendix F of the Outline LEMP) will be monitored and managed for up to 30 years, depending on the habitat type.</p> <p>The Applicant has reviewed NRW's Deadline 6 comments and has updated the Outline LEMP at Deadline 7 accordingly (J22 F05).</p>	<p>NRW (A) agree with the principles set out in the Outline Landscape and Ecology Management Plan and agree that the final Landscape and Ecology Management Plan will be agreed with the relevant planning authority.</p> <p>NRW (A) have reviewed the updated Outline LEMP (J22 F05) and the Applicant's comments to NRW (A) comments at Deadline 6.</p>	Agreed



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Reference Number	Discussion point	Applicant's Position	NRWs Position	Status
NRW.OE.14	Outline Management Plans	The Outline CoCP (APP-212) and the accompanying outline management plans are secured through the dDCO (PDA-003) and are appropriate with regard to proposed mitigation measures and monitoring.	NRW (A) agrees on the Outline CoCP.	Agreed
NRW.OE.15	Biosecurity Protocol	Agreement on the Outline Biosecurity Protocol (APP-223).	NRW (A) agrees on the Outline Biosecurity Protocol.	Agreed

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1.4.6 Air quality

Table 1.9: Agreement Log between the parties on air quality.

Reference Number	Discussion point	Applicant's Position	NRWs Position	Status
<b>EIA</b>				
NRW.AQ.1	Consultation	The Applicant has undertaken adequate consultation with potential impacts on air quality	NRW (A) agrees that the Applicant has undertaken adequate consultation with potential impacts on air quality.	Agreed
NRW.AQ2.2	Consultation	The EIA has had due regard to matters raised by NRW through statutory and non-statutory consultation on air quality	NRW (A) agrees	Agreed
NRW.AQ3.3	Policy and planning	The Application has identified and considered all plans and policies relevant to air quality, within NRW's remit.	NRW (A) agrees	Agreed
NRW.AQ.4	Study area	The study area is appropriate for the impacts and receptors assessed.	Agreed. Source: NRW's section 42 response on 01 June 2023.	Agreed
NRW.AQ.5	Scoping	Agreement on issues to be scoped out of the assessment	NRW (A) agree that operational and maintenance aspects can be scoped out of the assessment and the justification provided. Source: NRW's section 42 response on 01 June 2023.	Agreed
NRW.AQ.6	Assessment methodology	Agreement on the methodology for air quality assessment of construction traffic.	NRW (A) agree on the screening approach to heavy duty vehicles and light duty vehicles and the assessment of eight of the 23 links as identified in Volume 3, Chapter 8: Traffic and Transport (APP-071). Source: NRW's section 42 response on 01 June 2023.	Agreed

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Reference Number	Discussion point	Applicant's Position	NRWs Position	Status
NRW. AQ.7	Assessment methodology	Agreement on the methodology for construction dust assessment	NRW (A) agree with the methodology used to generate the risk of dust impacts matrix in accordance with Institute of Air Quality Management (IAQM) guidance.  Source: NRW's Relevant Representation (RR-011) and Written Representation.	Agreed
<b>Other Documents and Plans</b>				
NRW.AQ.8	Outline management plans	The Outline CoCP (APP-212) and the accompanying outline management plans are secured through the dDCO (PDA-003) and are appropriate with regard to proposed mitigation measures and monitoring.	NRW (A) agrees on the Outline CoCP.	Agreed

## 1.4.7 Materials and waste

Table 1.10: Agreement Log between the parties on materials and waste.

Reference Number	Discussion point	Applicant's Position	NRWs Position	Status
<b>EIA</b>				
NRW.M&W.1	Consultation	The Applicant has undertaken adequate consultation with potential impacts on materials and waste	NRW (A) agrees that the Applicant has undertaken adequate consultation with potential impacts on materials and waste.	Agreed
NRW.M&W.2	Consultation	The EIA has had due regard to matters raised by NRW through statutory and non-statutory consultation on materials and waste	NRW (A) agrees that the EIA has had due regard to matters raised by NRW through statutory and non-statutory consultation on materials and waste.	Agreed
NRW.M&W.3	Policy and planning	The Application has identified and considered all plans and policies relevant to materials and waste, within NRW's remit.	NRW (A) agrees that the Application has identified and considered all plans and policies relevant to materials and waste, within NRW's remit.	Agreed
NRW.M&W.4	Study area	The study area is appropriate for the impacts and receptors assessed.	NRW (A) agrees that the study area is appropriate for the impacts and receptors assessed.	Agreed