Partners in UK offshore wind

MONA OFFSHORE WIND PROJECT

Response to JNCC D6 Submission

Deadline: 7

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F01

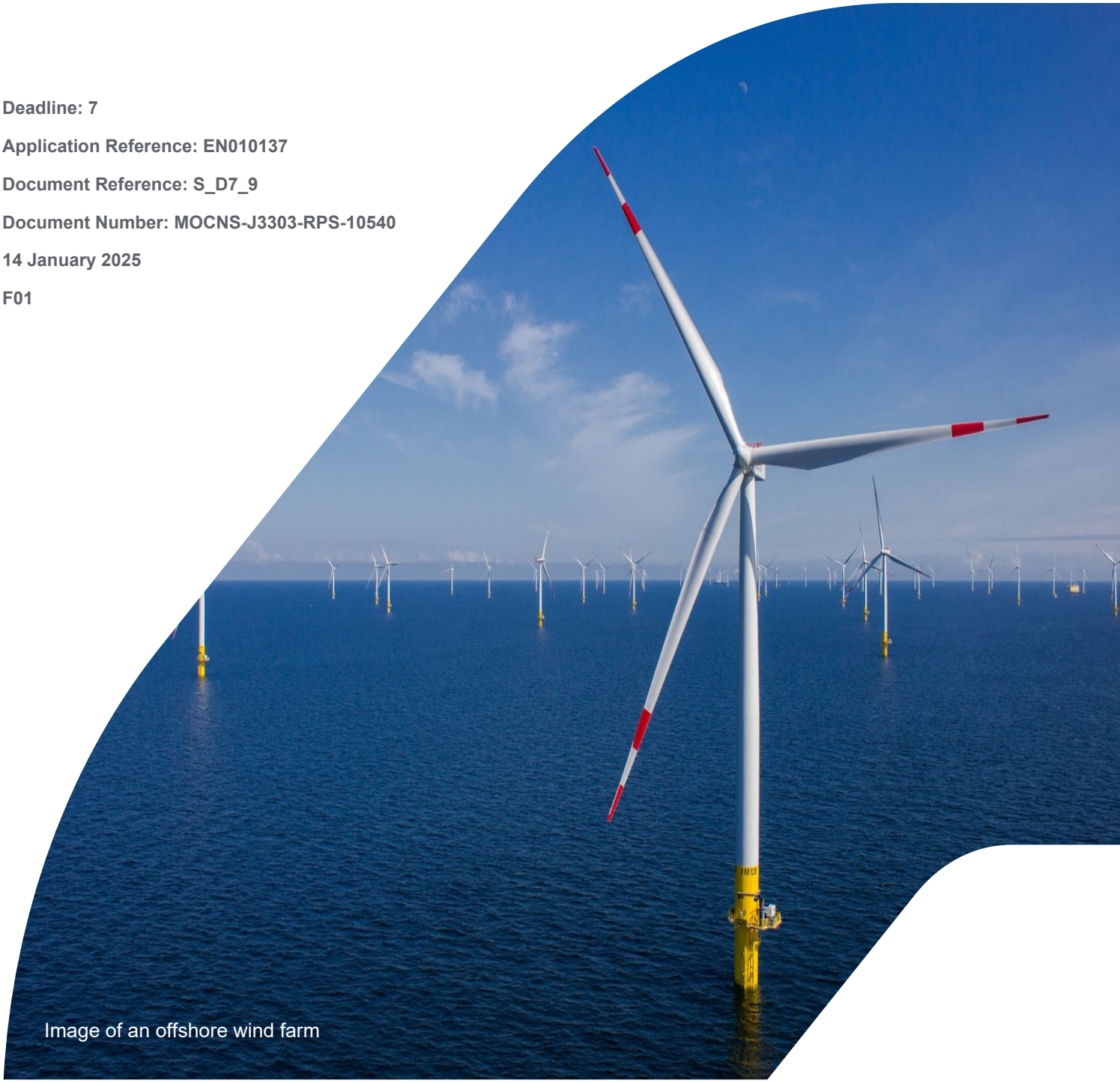

Image of an offshore wind farm

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Prepared by:

RPS

Prepared for:

Mona Offshore Wind Ltd.

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Glossary

Term	Meaning
Applicant	Mona Offshore Wind Limited.
Appropriate Assessment	A step-wise procedure undertaken in accordance with Article 6(3) of the Habitats Directive, to determine the implications of a plan or project on a European site in view of the site's conservation objectives, where the plan or project is not directly connected with or necessary to the management of a European site but likely to have a significant effect thereon, either individually or in-combination with other plans or projects.
Bodelwyddan National Grid Substation	This is the Point of Interconnection (POI) selected by the National Grid for the Mona Offshore Wind Project.
Competent Authority	Regulation 6(1) defines competent authorities as "any Minister, government department, public or statutory undertaker, public body of any description or person holding a public office".
Development Consent Order (DCO)	An order made under the Planning Act 2008 granting development consent for one or more Nationally Significant Infrastructure Project (NSIP).
Environmental Statement	The document presenting the results of the Environmental Impact Assessment (EIA) process for the Mona Offshore Wind Project.
Evidence Plan Process	The Evidence Plan process is a mechanism to agree upfront what information the Applicant needs to supply to the Planning Inspectorate as part of the Development Consent Order (DCO) applications for the Mona Offshore Wind Project.
Expert Working Group (EWG)	Expert working groups set up with relevant stakeholders as part of the Evidence Plan process.
Inter-array cables	Cables which connect the wind turbines to each other and to the offshore substation platforms. Inter-array cables will carry the electrical current produced by the wind turbines to the offshore substation platforms.
Interconnector cables	Cables that may be required to interconnect the Offshore Substation Platforms in order to provide redundancy in the case of cable failure elsewhere.
Intertidal access areas	The area from Mean High Water Springs (MHWS) to Mean Low Water Springs (MLWS) which will be used for access to the beach and construction related activities.
Intertidal area	The area between MHWS and MLWS.
Landfall	The area in which the offshore export cables make contact with land and the transitional area where the offshore cabling connects to the onshore cabling.
Local Authority	A body empowered by law to exercise various statutory functions for a particular area of the United Kingdom. This includes County Councils, District Councils and County Borough Councils.
Local Highway Authority	A body responsible for the public highways in a particular area of England and Wales, as defined in the Highways Act 1980.
Marine licence	The Marine and Coastal Access Act 2009 requires a marine licence to be obtained for licensable marine activities. Section 149A of the Planning Act 2008 allows an applicant for a DCO to apply for a 'deemed' marine licence as part of the DCO process. In addition,

Term	Meaning
	licensable activities within 12nm of the Welsh coast require a separate marine licence from Natural Resource Wales (NRW).
Maximum Design Scenario (MDS)	The scenario within the design envelope with the potential to result in the greatest impact on a particular topic receptor, and therefore the one that should be assessed for that topic receptor.
Mona 400kV Grid Connection Cable Corridor	The corridor from the Mona onshore substation to the National Grid substation at Bodelwyddan.
Mona Array Area	The area within which the wind turbines, foundations, inter-array cables, interconnector cables, offshore export cables and offshore substation platforms (OSPs) forming part of the Mona Offshore Wind Project will be located.
Mona Array Scoping Boundary	The Preferred Bidding Area that the Applicant was awarded by The Crown Estate as part of Offshore Wind Leasing Round 4.
Mona Offshore Cable Corridor	The corridor located between the Mona Array Area and the landfall up to MHWS, in which the offshore export cables will be located.
Mona Offshore Cable Corridor and Access Areas	The corridor located between the Mona Array Area and the landfall up to MHWS, in which the offshore export cables will be located and in which the intertidal access areas are located.
Mona Offshore Transmission Infrastructure Scoping Search Area	The area that was presented in the Mona Scoping Report as the area encompassing and located between the Mona Potential Array Area and the landfall up to MHWS, in which the offshore export cables will be located.
Mona Offshore Wind Project	The Mona Offshore Wind Project is comprised of both the generation assets, offshore and onshore transmission assets, and associated activities.
Mona Offshore Wind Project Boundary	The area containing all aspects of the Mona Offshore Wind Project, both offshore and onshore.
Mona Offshore Wind Project PEIR	The Mona Offshore Wind Project Preliminary Environmental Information Report (PEIR) that was submitted to The Planning Inspectorate (on behalf of the Secretary of State) and NRW for the Mona Offshore Wind Project.
Mona Offshore Wind Project Scoping Report	The Mona Scoping Report that was submitted to The Planning Inspectorate (on behalf of the Secretary of State) and NRW for the Mona Offshore Wind Project.
Mona Onshore Cable Corridor	The corridor between MHWS at the landfall and the Mona onshore substation, in which the onshore export cables will be located.
Mona Onshore Development Area	The area in which the landfall, onshore cable corridor, onshore substation, mitigation areas, temporary construction facilities (such as access roads and construction compounds), and the connection to National Grid substation will be located
Mona Onshore Transmission Infrastructure Scoping Search Area	The area that was presented in the Mona Scoping Report as the area located between MHWS at the landfall and the onshore National Grid substation, in which the onshore export cables, onshore substation and other associated onshore transmission infrastructure will be located.
Mona PEIR Offshore Cable Corridor	The corridor presented at PEIR that was consulted on during statutory consultation and has subsequently been refined for the application for Development Consent. It is located between the Mona Array Area and the landfall up to MHWS, in which the offshore export cables and the offshore booster substation will be located.

Term	Meaning
Mona PEIR Offshore Wind Project Boundary	The area presented at PEIR containing all aspects of the Mona Offshore Wind Project, both offshore and onshore. This area was the boundary consulted on during statutory consultation and subsequently refined for the application for Development Consent.
Mona Potential Array Area	The area that was presented in the Mona Scoping Report and in the PEIR as the area within which the wind turbines, foundations, meteorological mast, inter-array cables, interconnector cables, offshore export cables and OSPs forming part of the Mona Offshore Wind Project were likely to be located. This area was the boundary consulted on during statutory consultation and subsequently refined for the application for Development Consent.
Mona Proposed Onshore Development Area	The area presented at PEIR in which the landfall, onshore cable corridor, onshore substation, mitigation areas, temporary construction facilities (such as access roads and construction compounds), and the connection to National Grid infrastructure will be located. This area was the boundary consulted on during statutory consultation and subsequently refined for the application for Development Consent.
Mona Scoping Report	The Mona Scoping Report that was submitted to The Planning Inspectorate (on behalf of the Secretary of State) and NRW for the Mona Offshore Wind Project.
National Policy Statement (NPS)	The current national policy statements published by the Department for Energy Security & Net Zero in 2024.
Non-statutory consultee	Organisations that an applicant may choose to consult in relation to a project who are not designated in law but are likely to have an interest in the project.
Offshore Substation Platform (OSP)	The offshore substation platforms located within the Mona Array Area will transform the electricity generated by the wind turbines to a higher voltage allowing the power to be efficiently transmitted to shore.
Offshore Wind Leasing Round 4	The Crown Estate auction process which allocated developers preferred bidder status on areas of the seabed within Welsh and English waters and ends when the Agreements for Lease (AfLs) are signed.
Pre-construction site investigation surveys	Pre-construction geophysical and/or geotechnical surveys undertaken offshore and, or onshore to inform, amongst other things, the final design of the Mona Offshore Wind Project.
Point of Interconnection	The point of connection at which a project is connected to the grid. For the Mona Offshore Wind Project, this is the Bodelwyddan National Grid Substation.
Relevant Local Planning Authority	The Relevant Local Planning Authority is the Local Authority in respect of an area within which a project is situated, as set out in Section 173 of the Planning Act 2008. Relevant Local Planning Authorities may have responsibility for discharging requirements and some functions pursuant to the DCO, once made.
the Secretary of State for Business, Energy and Industrial Strategy	The decision maker with regards to the application for development consent for the Mona Offshore Wind Project.
Statutory consultee	Organisations that are required to be consulted by an applicant pursuant to the Planning Act 2008 in relation to an application for development consent. Not all consultees will be statutory consultees (see non-statutory consultee definition).

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

Acronyms

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

Units

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

1 Response to JNCC D6 Submission

1.1 Introduction

1.1.1.1 The Applicant has responded to JNCC's deadline 6 submission below.

2 Response to JNCC D6 Submission

2.1 Joint Nature Conservation Committee – Response to the Cumulative and In-combination Assessments (Ornithology)

Table 2.1: REP6-135 Joint Nature Conservation Committee – Response to the Cumulative and In-combination Assessments (Ornithology)

Planning Inspectorate Ref. No.	Written Submission Comment	Applicant's response
REP6-135.1	1 **Summary** We agree with the Applicant's conclusions regarding the significance of impacts at a cumulative scale to all species besides great black-backed gull. For great black-backed gull we are unable to rule out a significant adverse impact cumulatively. We agree with the Applicant's conclusions regarding no Adverse Effect on Integrity (AEoI) in-combination to Skomer, Skokholm and the Seas off Pembrokeshire/Sgomer, Sgogwm a Moroedd Penfro Special Protected Area (SPA). We strongly recommend that the information informing the updated cumulative and in-combination assessments are brought together in one place for clarity and accessibility for future projects. In giving this advice we have reviewed the following documents alongside previous submissions by the Applicant: • Offshore ornithology additional supporting in-combination assessment information in line with SNCB advice (REP5-074) • Offshore Ornithology Additional Supporting Cumulative Assessment Information in line with SNCB Advice (REP5-075)	The Applicant welcomes the JNCC's agreement with the Applicant's conclusions of significance of impacts at a cumulative scale to all species besides great black-backed gull. As set out in the Update on offshore ornithology principal matters (REP6-098) at Deadline 6, the Applicant acknowledges that a high volume of material for offshore ornithology has been submitted into Examination. In order to draw all the application and examination material for offshore ornithology together and to address the remaining minor outstanding matters between the Applicant and Interested Parties, the Applicant has undertaken a final update to Volume 2 Chapter 5: Offshore Ornithology (F2.5 F04) and the HRA Stage 2 ISAA Part Three: SPAs and Ramsar sites Assessments (E1.3 F03) to provide the relevant examination materials as a series of additional Annexes to the Environmental Statement chapter and ISAA at Deadline 7. Further information regarding the assessment scenarios considered and where those assessments are in the final offshore ornithology documents is presented in the Offshore Ornithology Final Position Paper (S_D7_6) submitted at Deadline 7.
REP6-135.2	2 **Updating the Environmental Statement (ES) and the Habitats Regulations Assessment (HRA) documents** We note that the predicted abundances and collision estimates for each offshore wind project included in the cumulative and in-combination assessments are now located across multiple documents: • Figures for projects with quantitative data available from their submissions are	

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	included in the updated 'Offshore Ornithology ES Chapter' REP4-007 • Figures for the gap-filled historical projects are available in the 'Offshore Ornithology Cumulative Effects Assessment and In-combination Gap-filling Historical Projects Technical Note' REP4-028 • Updated figures for Morgan Generation and Morecambe Generation Assets are included in Table 1-1 of REP5-075 • Figures included for Llŷr 1 are located in the relevant species tables within REP5-075; • The updated figures for Burbo Bank Extension and TwinHub for herring gull and lesser black-backed gull respectively are located in Tables 1-17 and 1-18 of REP5-075, respectively. We would therefore strongly recommend that by the end of the examination the Applicant either: submits updated Offshore Ornithology chapters that includes full cumulative and in-combination abundance and collision tables including the quantitative impacts for each project in the cumulative and in-combination assessments, or alternatively a standalone Environment Impact Assessment (EIA) cumulative document and a HRA in-combination document that brings all of this information, project by project, together for each species. This is in order to bring all the numbers into the cumulative and in-combination assessments into one place that is readily and easily accessible for future projects to utilise this information.	
REP6-135.3	3 **Approaches taken** We thank the Applicant for providing updated cumulative and in-combination assessments incorporating all Statutory Nature Conservation Bodies (SNCB) advice. We agree with the approach taken in REP5-074 and REP5-075 to the consideration of projects which have submitted consent applications since the in-combination assessment for the Mona Offshore Wind Project was undertaken (namely Morgan Generation Assets, Morecambe Generation Assets, and Llŷr 1 Floating Offshore Wind Farm). We agree with the	The Applicant welcomes the JNCC's comments.

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	approach taken in REP5-074 to age-class proportions during the breeding season.	
REP6-135.4	**4 Cumulative assessment** We provide our conclusions regarding the EIA cumulative assessment on each relevant species below.	The Applicant welcomes the JNCC's agreement with the conclusion of the EIA Cumulative Effects Assessment, apart from great black-backed gull. For this species, the Applicant notes that the JNCC has previously confirmed that the mitigation commitments made by the Mona Offshore Wind Project are sufficient for this species and, therefore, does not propose that the Applicant needs to implement any further mitigation (see JNCC's Comments on Applicant's response to Examining Authority's Written Questions Q1.17.16 (REP4-098)).
REP6-135.5	**4.1 Atlantic puffin** The predicted 648 mortalities annually (displacement at 70% displacement and 10% mortality) due to the project alone represents a 0.25% increase in baseline mortality. Therefore, we agree with the conclusion of a minor adverse impact, even under the worstcase impact scenario.	
REP6-135.6	**4.2 Black-legged kittiwake** The predicted cumulative 2,346.10 mortalities annually (collision and displacement at 70% displacement and 10% mortality), of which Mona contributes 162.87 mortalities annually, represents a 1.65% increase in baseline mortality. The Population Viability Analysis (PVA) suggests an increasing population after 35 years of operation, as indicated by a growth rate above 1, and the Counterfactual of Growth Rate is 0.997. This suggests that there will be only a small impact on the growth rate in comparison to baseline conditions, even under the worst-case impact scenario. Therefore, we agree with the conclusion of a minor adverse impact.	
REP6-135.7	**4.3 Common guillemot** The predicted cumulative 7,799 mortalities annually (displacement at 70% displacement and 10% mortality), of which Mona contributes 558 mortalities annually, represents a 5.15% increase in baseline mortality. The PVA suggests an increasing population after 35 years of operation, as indicated by a growth rate above 1, and the Counterfactual of Growth Rate is 0.992. This suggests that there will be only	

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	a small impact on the growth rate in comparison to baseline conditions, even under the worst-case impact scenario. Therefore, we agree with the conclusion of a minor adverse impact.	
REP6-135.8	**4.4 Manx shearwater** The predicted cumulative 2,491 mortalities annually (displacement at 70% displacement and 10% mortality), of which Mona contributes 89 mortalities annually, represents a 1.05% increase in baseline mortality. The PVA suggests an increasing population after 35 years of operation, as indicated by a growth rate above 1, and the Counterfactual of Growth Rate is 0.997. This suggests that there will be only a small impact on the growth rate in comparison to baseline conditions, even under the worst-case impact scenario. Therefore, we agree with the conclusion of a minor adverse impact.	
REP6-135.9	**4.5 Northern gannet** The predicted 860.87 mortalities annually (collision and displacement at 80% displacement and 10% mortality) due to the project alone represents a 0.674% increase in baseline mortality even under the worst-case impact scenario. Therefore, we agree with the conclusion of a minor adverse impact.	
REP6-135.10	**4.6 Razorbill** The predicted cumulative 1,394 mortalities annually (displacement at 70% displacement and 10% mortality), of which Mona contributes 176 mortalities annually, represents a 1.34% increase in baseline mortality. The PVA suggests an increasing population after 35 years of operation, as indicated by a growth rate above 1, and the Counterfactual of Growth Rate is 0.997. This suggests that there will be only a small impact on the growth rate in comparison to baseline conditions, even under the worst-case impact scenario.	

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	Therefore, we agree with the conclusion of a minor adverse impact.	
REP6-135.11	**4.7 Great black backed gull** As previously stated, we are unable to rule out a significant adverse impact on great black-backed gull from cumulative collision mortality at an EIA scale (REP4-098). The Applicant has subsequently incorporated the Llŷr 1 Floating Offshore Wind Farm, updated abundance and collision estimates for the Morgan Offshore Wind Project: Generation Assets and Morecambe Offshore Wind Farm: Generation Assets, and removed the collision estimates from the West of Orkney Offshore Wind Project. This now results in 163.51 annual mortalities cumulatively (REP5-075), compared to 162.87 annual mortalities submitted at Deadline 3 (REP3-044), on which we based our conclusion of significant adverse impact (REP4-098). The predicted cumulative 163.51 mortalities annually, of which Mona contributes 4.83 mortalities annually, represents a 9.70% increase in baseline mortality. The PVA suggests an increasing population after 35 years of operation, as indicated by a growth rate above 1, and the Counterfactual of Growth Rate is 0.990. For the reasons stated in REP4-098 we do not agree with the conclusion of a minor adverse impact. We are unable to rule out a significant adverse impact.	
REP6-135.12	**4.8 Herring gull** The predicted 293.24 mortalities annually due to the project alone represents a 0.790% increase in baseline mortality. Therefore, we agree with the conclusion of a minor adverse impact.	
REP6-135.13	**4.9 Lesser black-backed gull** The predicted cumulative 291.17 mortalities annually, of which Mona contributes 1.92 mortalities annually, represents a 1.00% increase in baseline mortality. The PVA suggests	

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	an increasing population after 35 years of operation, as indicated by a growth rate above 1, and the Counterfactual of Growth Rate is 0.999. This suggests that there will be only a small impact on the growth rate in comparison to baseline conditions. Therefore, we agree with the conclusion of a minor adverse impact.	
REP6-135.14	**5 In-combination assessment** We note that the Applicant has updated the population estimates used in the in-combination assessment (REP5-074, Section 1.4.1) to the most recent counts, which for all species considered except Manx shearwater are counts from 2024. Whilst we appreciate this represents the most up to date information on populations at relevant colonies, they are not contemporaneous with the baseline surveys carried out in order to calculate estimated mortalities. It is important to use contemporaneous data in order to be comparing like-for-like impacts against populations. This is particularly crucial should there be a large change in the population at a colony after baseline surveys being carried out. For instance, the Highly Pathogenic Avian Influenza (HPAI) outbreak caused large numbers of mortalities in 2022 and 2023. Northern gannet at Grassholm were particularly severely affected, with a 52% reduction in nesting pairs from 2022 to 2023 (Johnstone et al., 2022). This is reflected in Seabird Monitoring Programme counts showing 78,584 adults in 2009 and 72,022 in 2015, then just 32,964 in 2023 and 39,398 in 2024. Therefore, comparing mortalities associated with offshore wind farm development calculated using data collected pre-HPAI against colony counts post-HPAI is not appropriate, and is likely to overestimate relative impacts. Therefore, we recommend the most contemporaneous colony counts to baseline surveys are used within impact assessments. Having said that, using the most recent colony counts doesn't make a substantial difference to the results of the in-combination assessment	The Applicant notes the JNCC's comments and confirms that the following regard has been given to these in the updated HRA Stage 2 Information to Support Appropriate Assessment Part Three: Special Protection Areas and Ramsar sites Assessments (E1.3 F03) and new annex Offshore ornithology ISAA Supporting Information (E1.3.1 F01) submitted at Deadline 7: • The Applicant can confirm that the most contemporaneous colony counts have been used within the impact assessments (which supersede those considered in the Offshore ornithology additional supporting in-combination assessment information in line with SNCB advice (REP5-074) note submitted at Deadline 5); and • Consideration has been given to the implications of the Highly Pathogenic Avian Influenza (HPAI) outbreak, particularly in relation to Northern gannet at Grassholm SPA – this information is provided in section 1.5.4 of the Offshore ornithology ISAA Supporting Information (E1.3.1 F01). The Applicant welcomes the JNCC's agreement that for Skomer, Skokholm and the Seas off Pembrokeshire/Sgomer, Sgogwm a Moroedd Penfro SPA, adverse effect on site integrity from the Mona Offshore Wind Project in-combination with other projects and plans can be ruled out. This agreement is reflected in row JNCC.OO.33 of the Statement of Common Ground between Mona Offshore Wind Project and the Joint Nature Conservation Committee (S_D1_15 F03) submitted at Deadline 7.

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	with regard to Skomer, Skokholm and the Seas off Pembrokeshire/Sgomer, Sgogwm a Moroedd Penfro SPA compared to using contemporaneous colony counts. Therefore, whilst we would not recommend the most recent colony counts in favour of contemporaneous colony counts, we do remain in agreement with the Applicant's in-combination assessment of Skomer, Skokholm and the Seas off Pembrokeshire/Sgomer, Sgogwm a Moroedd Penfro SPA. The relevant seabird features of Skomer, Skokholm and the Seas off Pembrokeshire/Sgomer, Sgogwm a Moroedd Penfro SPA are: • European storm petrel • Manx shearwater • Atlantic puffin • Lesser black-backed gull • Seabird assemblage In summary, our conclusions on Likely Significant Effect (LSE) and Adverse Effect on Integrity (AEoI) to each feature in Skomer, Skokholm and the Seas off Pembrokeshire/Sgomer, Sgogwm a Moroedd Penfro SPA are presented in the table below. We provide further detail on our conclusions regarding LSE and AEoI to each feature below	
REP6-135.15	**5.1 European storm petrel** We agree with Table 1.68 of the HRA Stage 1 Screening (REP2-012) that there is no Likely Significant Effect to European storm petrel.	
REP6-135.16	**5.2 Manx shearwater** The predicted in-combination 1561.38 mortalities annually (collision and displacement at 70% displacement and 10% mortality), of which Mona contributes 66.14 mortalities annually, represents a 1.32% increase in baseline mortality. The PVA suggests an increasing population after 35 years of operation, as indicated by a growth rate above 1, and the Counterfactual of Growth Rate is 0.998. This suggests that there will be only a small impact on the growth rate in comparison to baseline conditions. Therefore, we agree with	

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	the conclusion that AEoI from the project alone and in-combination with other Plans and Projects can be ruled out, even under the worst-case impact scenario.	
REP6-135.17	**5.3 Atlantic puffin** We agree with the information provided in Sections 1.5.1.3 to 1.5.1.4 of REP4-030 which, through the calculation of more than 0.0 apportioned mortalities (REP4-030, Table 1-8), the Applicant has effectively concluded a Likely Significant Effect to Atlantic puffin. We consider that AEoI from the project alone can be ruled out on the basis that these mortalities constitute less than a 1% increase in baseline mortality (REP4-030, Table 1-8). We also consider that AEoI from the project in-combination with other Plans and Projects can be ruled out for these SPAs on the basis that these mortalities constitute less than a 0.05% increase in baseline mortality (REP4-030, Table 1-8), even under the worst-case impact scenario.	
REP6-135.18	**5.4 Lesser black-backed gull** We agree with the information provided in Sections 1.5.2.13 to 1.5.2.15 of REP4-030 which, through the calculation of more than 0.0 apportioned mortalities (REP4-030, Table 1-17), the Applicant has effectively concluded a Likely Significant Effect to lesser black-backed gull. We consider that AEoI from the project alone can be ruled out on the basis that these mortalities constitute less than a 1% increase in baseline mortality (REP4-030, Table 1-17). We also consider that AEoI from the project in-combination with other Plans and Projects can be ruled out for these SPAs on the basis that these mortalities constitute less than a 0.05% increase in baseline mortality (REP4-030, Table 1-17).	
REP6-135.19	**5.5 Seabird assemblage** Seabird assemblage with an estimated 394,260 individuals in total at designation, and the main components are razorbill, common guillemot, black-legged kittiwake, Atlantic puffin, lesser black-backed gull, Manx shearwater, and European storm petrel. The Applicant	

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	has made individual assessments of the impact of the Project on each assemblage component:	
REP6-135.20	**5.5.1 Razorbill** PVA input log not provided. The predicted in-combination 35.40 mortalities annually (collision and displacement at 70% displacement and 10% mortality), of which Mona contributes 3.04 mortalities annually, represents a 2.27% increase in baseline mortality. The PVA suggests an increasing population after 35 years of operation, as indicated by a growth rate above 1, and the Counterfactual of Growth Rate is 0.997. This suggests that even at the worst-case scenario of 70% displacement and 10% mortality there will be only a small impact on the growth rate in comparison to baseline conditions. The Applicant's preferred rates of 70% displacement and 2% mortality indicates a lower impact on growth rate than the worst-case scenario, and the population is likely to continue to grow under an impacted scenario. The latest seabird census indicates that the population has increased since 2000, by 110% at Skomer, 169% at Skokholm, and 129% at Midland Island (Middleholm) (Burnell et al., 2023), and annual data suggests a fluctuating population (Seabird Monitoring Programme).	
REP6-135.21	**5.5.2 Common guillemot** The predicted in-combination 677.46 mortalities annually (collision and displacement at 70% displacement and 10% mortality), of which Mona contributes 6.77 mortalities annually, represents a 27.82% increase in baseline mortality. The PVA suggests an increasing population after 35 years of operation, as indicated by a growth rate above 1, and the Counterfactual of Growth Rate is 0.981. This suggests that there will be only a small impact on the growth rate in comparison to baseline conditions. The Applicant's preferred rates of 70% displacement and 2% mortality	

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	indicates a lower impact on growth rate than the worstcase scenario, and the population is likely to continue to grow under an impacted scenario. The latest seabird census indicates that the population has largely increased since 2000, by 95% at Skomer, 409% at Skokholm, and declined by 7% at Midland Island (Middleholm) (Burnell et al., 2023), and annual data suggests a fluctuating population (Seabird Monitoring Programme).	
REP6-135.22	**5.5.3 Black-legged kittiwake** The predicted in-combination 19.03 mortalities annually (collision and displacement at 70% displacement and 10% mortality), of which Mona contributes 0.31 mortalities annually, represents a 4.15% increase in baseline mortality. Whilst the PVA suggests a declining population after 35 years of operation, as indicated by a growth rate below 1, the Counterfactual of Growth Rate is 0.933, with the other scenarios modelled by the Applicant (collision and displacement at 30% displacement and 3% mortality, and collisions only) showing a lower level of impact. This suggests that there will be only a small impact on the growth rate in comparison to baseline conditions. The latest seabird census indicates that the population has declined by 36% since 2000 (Burnell et al., 2023), however, annual data suggests a fluctuating population (Seabird Monitoring Programme). The Applicant has further demonstrated that whilst the NatureScot method apportions a certain level of breeding season mortalities to the Skomer, Skokholm and the Seas off Pembrokeshire/Sgomer, Sgogwm a Moroedd Penfro SPA, GPS tracking studies as collated in Trevail et al. (2019) and Trevail (2019) show that in reality only small numbers of blacklegged kittiwake breeding within the SPA are likely to forage in the area occupied by the proposed project (recognising the uncertainty as a result of the small sample size of birds breeding in the SPA in those studies, and that only birds from Skomer were tracked).	

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REP6-135.23	**5.5.4 Atlantic puffin** We agree with the information provided in Sections 1.5.1.3 to 1.5.1.4 of REP4-030 which, through the calculation of more than 0.0 apportioned mortalities (REP4-030, Table 1-8), the Applicant has effectively concluded a Likely Significant Effect to Atlantic puffin, but has demonstrated very low levels of impact on this species (less than 1 mortality per annum apportioned to the SPA (REP4-030, Table 1-8).	
REP6-135.24	**5.5.5 Lesser black-backed gull** We agree with the information provided in Sections 1.5.2.13 to 1.5.2.15 of REP4-030 which, through the calculation of more than 0.0 apportioned mortalities (REP4-030, Table 1-17), the Applicant has effectively concluded a Likely Significant Effect to lesser black-backed gull, but has demonstrated very low levels of impact on this species (less than 1 mortality per annum apportioned to the SPA (REP4-030, Table 1-17).	
REP6-135.25	**5.5.6 Manx shearwater** The predicted in-combination 1561.38 mortalities annually (collision and displacement at 70% displacement and 10% mortality), of which Mona contributes 66.14 mortalities annually, represents a 1.32% increase in baseline mortality. The PVA suggests an increasing population after 35 years of operation, as indicated by a growth rate above 1, and the Counterfactual of Growth Rate is 0.998. This suggests that there will be only a small impact on the growth rate in comparison to baseline conditions, even under the worst-case impact scenario	
REP6-135.26	**5.5.7 European storm petrel**	

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	We agree with Table 1.68 of the HRA Stage 1 Screening (REP2-012) that there is no Likely Significant Effect to European storm petrel	
REP6-135.27	**5.5.8 Seabird Assemblage Conclusion** In conclusion, razorbill, common guillemot, and black-legged kittiwake all show fluctuating populations, and the Applicant has demonstrated that the growth rates of these Seabird Assemblage components are unlikely to be significantly affected over the lifetime of the project. Similarly, the Applicant has demonstrated that the populations of the other main Seabird Assemblage components are unlikely to be significantly impacted and continue to be stable or increasing. There is therefore an extremely low risk that any of the main component species would become locally extinct as a result of impacts from the proposed project, or that the overall population abundance of the Seabird Assemblage qualifying feature would significantly decline over the lifetime of the project. Therefore, we agree with the conclusion that AEoI from the project alone and in-combination with other Plans and Projects can be ruled out.	

2.2 Joint Nature Conservation Committee – Response to Deadline 5 submissions relating to Marine mammals

Table 2.2: REP6-135 Joint Nature Conservation Committee – Response to Deadline 5 submissions relating to Marine mammals

Planning Inspectorate Ref. No.	Written Submission Comment	Applicant's response
REP6-135.28	**JNCC Response to Deadline 5 submissions relating to marine mammals** **Unexploded ordnance (UXO) clearance in the Development Consent Order** We appreciate the Applicant's commitment to remove high order clearance of UXOs from the Development Consent Order (DCO). However, for the reasons provided at Deadline 5 (REP-5-096), our first preference is still that no UXO clearance activity using detonation is included as a licenced activity. We do agree that the identification/investigation surveys can be included. We note that definitions of high and low order clearance have been added to the draft DCO and other documents submitted at Deadline 5. We provide below definitions used in the JNCC mitigation guidelines for UXO clearance in case useful for the Applicant. The guidelines are due to be published in January 2025 and these definitions have been developed in conjunction with the Institute of Explosive Engineers. High order detonation: Detonation at a velocity approaching the maximum stable velocity of detonation for the system. When a high order explosion is initiated, a very rapid exothermic chemical reaction occurs. High order explosives have a strong supersonic pressure wave, known as the blast wave or shock wave. Low order detonation: A detonation in which the charge is completely consumed but the velocity of detonation is well below its maximum value, and therefore its effect is lessened.	The Applicant acknowledges the JNCC's continued preference that no UXO clearance activity using detonation is included in the DCO as a licenced activity. The Applicant highlights in response to the Examining Authority's First Written Questions, JNCC stated in response to Q1.17.9 that they would be 'supportive of Option 2 (restriction to low order only) if in addition to the DCO/deemed Marine License specifying all UXO clearance is restricted low-noise methods only, that it also clearly stated should high order clearance be required, it will be subject to a separate marine licence application' (see REP3-084). High order clearance or 'intentional detonation' (as set out in the updated Outline Underwater Sound Management Strategy (UWSMS) at Deadline 5 (REP5-029)) will not be authorised under the DCO, and will not be applied for under the standalone NRW Marine Licence (ML) (as set out in commitment 111 in the Mitigation and Monitoring Schedule (REP6-027)). As set out in paragraph 1.1.1.4 of the Outline UWSMS at Deadline 5 (REP5-029), the Applicant expects to use low order clearance methods that neutralise the UXO to be safe without detonation (defined in paragraph 1.6.2.6 of the Outline UWSMS (REP5-029)). The Applicant will review the updated JNCC mitigation guidelines for UXO clearance once it is available when finalising the UWSMS. The Applicant's position on UXO clearance has been set out in section 2.17.3 of the Applicant's closing statement (S_D7_2).

Planning Inspectorate Ref. No.	Written Submission Comment	Applicant's response
REP6-135.29	**Outline Underwater Sound Management Strategy (oUWSMS) and outline Marine Mammal Mitigation Plan (oMMMP)** JNCC had sight of both of these documents pre-application and provided the Applicant with comments. We agreed in principle to both of these documents and some of our comments were addressed prior to submission to the Examining Authority although not all. Our key outstanding concern during the examining process has been the use of noise abatement for piling and how it was referred to within these documents. Discussions with the Applicant on this matter have continued through the examination process and the Applicant submitted updated versions to both these documents at Deadline 5. We now confirm we are content with how noise abatement is referred to in the outline documents, and that the final documents can be agreed post consent, should it be awarded. Generally, these documents provide sufficient assurances that appropriate mitigation measures are available and will be considered to reduce impacts to marine mammals from piling identified in the impact assessment. We also note (and agree with) the commitment to ensure the final documents are not restricted to mitigation currently available and will be adapted to reflect best practice at the time of operation. Regarding mitigation measures described for UXO clearance, we refer to our advice not to include UXO clearance in the DCO and the document supporting this submitted at Deadline 5 (REP-5-096). The lack of information available at this stage means we are unable to comment on the context of these documents with regards to UXO clearance. We highlight that much work is still needed to both documents before we could approve the final versions, including: - Current overlap/repetition between the two documents. For example, background information currently in the oMMMP regarding key species sensitivities (Section 1.2), legislation (Section 1.3), and results from the Environmental Statement (ES)	The Applicant welcomes the JNCC's agreement that they are content with how noise abatement is referred to in the outline UWSMS (REP5-028) and outline Marine Mammal Mitigation Protocol (REP5-032) (outline MMMP), and that the final documents can be agreed post consent. The Applicant welcomes the JNCC's confirmation that the outline UWSMS (REP5-028) and outline MMMP (REP5-032) provide sufficient assurances that appropriate mitigation measures are available and will be considered to reduce impacts to marine mammals from piling (see row JNCC.MM.20 in the SoCG between Mona and the JNCC (S_D1_15_F03)). The Applicant acknowledges that these documents are outline and will be updated, in consultation with the JNCC before they are submitted as final to the licencing authority. The final MMMP and UWSMS will contain more detailed and specific mitigation information following refinement of the project design, and the Applicant highlights there are specific sections in the outline UWSMS which will demonstrate the changes from the Environmental Statement (see Section 1.7 'Reduction in effects due to the refined PDE' in the outline UWSMS (REP5-028)). The Applicant thanks the JNCC for their view of the nuances of the mitigation definitions in the IEMA guidance and agrees that passive acoustic monitoring (PAM) and marine mammal observers (MMOs) are considered standard practice for offshore wind piling in the UK due to the potential risk of injury. The Applicant has updated the definitions in the outline MMMP (REP5-032) and outline UWSMS (REP5-028) in accordance with the IEMA (2024) guidance and notes that these updates have been agreed with JNCC (see row JNCC.MM.20 in the SoCG between Mona and the JNCC (S_D1_15_F03)). The Applicant continues to confirm they will engage with SNCBs including JNCC in the finalisation of the UWSMS and MMMP post consent.

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	impact assessment (Section 1.4) are not appropriate for inclusion in a mitigation plan. This information should be in the UWSMS and the MMMP should focus purely on mitigation requirements so it can be easily digested and applied in the field. - Section 1.1.2 of the oUWSMS considers marine mammal sensitivities but only talks about two species. It is not clear whether the sensitivities being considered are residual impacts following consideration of mitigation or not. When considering sensitivities to noise, this strategy should consider them without mitigation, so it is clear how impacts predicted in the ES are being addressed. - It is claimed the oUWSMS considers injury and disturbance to marine mammals, but the mitigation measures highlighted (and considered in the oMMMP) are for injury only. - How mitigation measures are described in the context of the IEMA 2024 guidelines needs discussing. For example, the use of marine mammal observers and acoustic monitoring ahead of piling is currently described as tertiary measures. The IEMA guidance describes tertiary measures as those required regardless of Environmental Impact Assessment, as imposed for example, because of legislative requirements. While following the JNCC mitigation guidelines is considered standard practice in the UK, their employment is because a risk of injury has been identified in the impact assessment, not because there is a legislative or other requirement. - Much more detailed information on the activities to be undertaken is required, and changes since the ES, and how such changes affect assessment results presented in the ES will need discussing. The draft DCO includes a condition to submit the final versions of these documents to the licensing authority no later than four months before the activity begins. The applicant has also committed within these documents to engage with Statutory Nature Conservation Bodies (SNCBs) when developing the final versions. As offshore construction activities are currently planned to commence in 2026 (Section 3.8, APP-	

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	050), we strongly recommend the applicant engages with the SNCBs well in advance of this four month deadline to prevent potential delays to the approval process.	
REP6-135.30	**European Protected Species (EPS)** We note both the oUWSMS and oMMMP include reference to mitigation for geophysical surveys to support future EPS licence applications. We highlight that while the mitigation considered is appropriate for reducing the risks of injury from such surveys, they do not consider disturbance. SNCB guidance (JNCC 2010) states that for most cetacean populations in UK waters, deliberate disturbance in terms of the regulations is unlikely to result from single, short-term operations, e.g. a seismic vessel operating in an area for 4-6 weeks, or the driving of a dozen small diameter piles. Non-trivial disturbance, which would constitute an offence under the regulations would likely result from more prevalent activities in an area, chronically exposing the same animals to disturbance or displacing animals from large areas for long periods of time. For example, pile driving or geophysical surveys on one area for several months. We also highlight that the information provided within these documents is not sufficient to support compliance with the three tests required when applying for an EPS licence. Additional information would be required to support any licence application.	The Applicant acknowledges that these documents are outline and will be updated, in consultation with the JNCC, before they are submitted as final to the licencing authority. The Applicant will submit a separate European Protected Species (EPS) supporting information document to support an EPS licence if required following the final project design post-consent (i.e. where there is determined to be a potential for risk to EPS) and will address the three EPS tests when the Applicant applies to the separate licencing process, and not in the outline MMMP (REP5-032) and outline UWSMS (REP5-028). The Applicant agrees that the three tests will need to be satisfied and will compile the relevant EPS supporting information document setting out the necessary information against these three tests when required, but highlights that this will be done at the relevant time post consent following finalisation of the Mona Offshore Wind Project design.
REP6-135.31	**Adverse effect on European Sites with marine mammal features** We note the Applicant has removed high order clearance of UXOs from the draft DCO as a licenced activity, and their response to questions in REP-083. While we still maintain that detonation of UXOs is not a licensed activity within the DCO, we agree an adverse effect on offshore Special Areas of Conservation (SACs) with marine mammal features can be excluded, both alone and in combination. This conclusion considers the removal of high order clearance from the	The Applicant welcomes the JNCC's agreement that an adverse effect on offshore Special Areas of Conservation (SACs) with marine mammal features can be excluded, both alone and in combination. The Applicant acknowledges that the outline MMMP (REP5-032) and outline UWSMS (REP5-028) documents are outline and will be updated, in consultation with the JNCC, before they are submitted as final to the licencing authority.

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	design envelope and is conditional of the UWSMS and MMMP being secured in the consent. The closest European site relative to the proposed project is the North Anglesey Marine SAC for harbour porpoise. We note in REP-083 the Applicant has listed several environmental concerns that can prevent low order clearance methods of UXO clearance from being used. This includes excessive/strong tidal currents and insufficient visibility to operate ROVs. Why these may be potential limitations generally, we note excessive/strong currents have not been identified at the project location and insufficient visibility was not an issue raised when undertaking baseline benthic surveys. We also highlight that if environmental conditions are such that visibility (or any aspect of a mitigation plan for any activity) is temporarily restricted, the activity being mitigated should be delayed until conditions are suitable. This should be made clear in final MMMPs, which for piling we are content can be finalised post consent (if awarded).	

2.3 Joint Nature Conservation Committee – Measures to Minimise Disturbance to Marine Mammals and Rafting Birds

Table 2.3: REP6-135 Joint Nature Conservation Committee – Measures to Minimise Disturbance to Marine Mammals and Rafting Birds

Planning Inspectorate Ref. No.	Written Submission Comment	Applicant's response
REP6-135.32	**Measures to minimise disturbance to marine mammals and rafting birds** We welcome the extension of the seasonal restriction to low order unexploded ordnance (UXO) clearance within the Liverpool Bay/Bae Lerpwl Special Protected Area (SPA) during the sensitive period (1 November – 31 March inclusive) as set out in Section 1.3.1 of REP5- 030. We note that high order clearance would need a separate licence application, and we would expect the principles established in REP5-030 with regard to the SPA to be applied to any high-order UXO clearance. We note the assessment carried out of impacts of pre-commencement works on the nonbreeding red-throated diver and common scoter qualifying features of the SPA, particularly with regard to visual disturbance from vessel movements, in APP-033 and revised in comments by the Applicant in response to Examining Authority question 3.3.9 (REP5-083). With the application of the seasonal restriction to works within the SPA to both export cable installation activities, UXO clearance, the other measures contained within REP5-030 to further reduce disturbance of rafting birds, and the low and temporary impact of remaining pre-commencement activities, JNCC is content that there would not be an Adverse Effect on Integrity of the non-breeding red-throated diver and common scoter qualifying features of the Liverpool Bay/Bae Lerpwl SPA, either from the project alone or in-combination with other plans and projects. As such, given confirmation of the following measures are now confirmed; - application of the seasonal restriction to works within the SPA to both export cable installation activities and UXO	The Applicant welcomes JNCCs agreement that there would not be an Adverse Effect on Integrity of the non-breeding red-throated diver and common scoter qualifying features of the Liverpool Bay/Bae Lerpwl SPA, either from the project alone or in-combination with other plans and projects.

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	clearance - other measures contained within REP5-030 are secured to further reduce disturbance of rafting birds - and the above aspects subsequently resulting in low and temporary impact of remaining pre-commencement activities JNCC is now content that there would not be an Adverse Effect on Integrity of the nonbreeding red-throated diver and common scoter qualifying features of the Liverpool Bay/Bae Lerpwl SPA, either from the project alone or in-combination with other plans and projects	

2.4 Joint Nature Conservation Committee – Update to Benthic Mitigation and Monitoring

Table 2.4: REP6-135 Joint Nature Conservation Committee – Update to Benthic Mitigation and Monitoring

Planning Inspectorate Ref. No.	Written Submission Comment	Applicant's response
REP6-135.33	**Update to benthic mitigation and monitoring** **JNCC's conclusion and suggested update** Based on the Applicant's re-analysis of the magnitude of effects and sensitivity, and the resulting significance of effects (REP4-062; reference REP3-084.5), which JNCC would consider to be a moderate adverse effect, we would suggest the following be added to the mitigation measures and conditions outlined in Volume 2, Chapter 2: Benthic subtidal and intertidal ecology (APP-054), the Mitigation and Monitoring schedule (APP-196), and the DCO. "If seapens are noted during pre-construction surveys they should be avoided as much as practically possible during the subsequent proposed operations." **Rationale and expectations** The above suggested wording brings our advice in line with all other offshore industry sectors and projects that we advise on where an IEF is present outside of a marine protected site. We would not expect additional benthic surveys or detailed analysis to be undertaken. Instead, it would be sufficient for any information gathered from pre-construction surveys (for example, but not limited to, obstruction surveys for cable routing) that highlight the presence of seapens to be used. We would not expect all seapens to be avoided during construction, operation, and decommissioning phases but rather request that where "practically possible" they are. Based on the Applicant's benthic survey data not identifying any seapens in the area, we would not expect this to be an onerous task.	As set out in row REP5-094.3 of the Applicant's Response to JNCC D5 Submission - Offshore Benthic Environment Concerns (REP6-091), the Applicant maintains that the assessment of the seapens and burrowing megafauna communities Important Ecological Feature (IEF) in Volume 2, Chapter 2: Benthic subtidal and intertidal ecology (F2.4 F02) and the conclusion of minor adverse significance is sufficiently precautionary for the habitat present within the Mona Array Area. The effect is, therefore, not significant in Environmental Impact Assessment (EIA) terms and monitoring is not required or proportionate to the predicted impact. Whilst the Applicant's position remains that mitigation for predicted impacts to the seapens and burrowing megafauna communities IEF is not required, the Applicant has included the following commitment as specifically requested by the JNCC in the Mitigation and Monitoring Schedule (J10 F07) at Deadline 7: '*If seapens are noted during pre-construction surveys they should be avoided as much as practically possible during the subsequent proposed operations'*. The Applicant's position regarding the concerns raised by the JNCC during Examination in relation to its seapens and burrowing megafauna communities IEF assessment is set out in section 2.17.2 of the Applicant's closing submission (S_D7_2).