Partners in UK offshore wind

MONA OFFSHORE WIND PROJECT

Response to NRW D6 Submission

Deadline: 7

Application Reference: EN010137

Document Reference: S_D7_11

Document Number: MOCNS-J3303-RPS-10542

14 January 2025

F01

Image of an offshore wind farm

www.morganandmona.com/en

Document status

Version	Purpose of document	Authored by	Reviewed by	Approved by	Review date
F01	Submission at D7	RPS	Mona Offshore Wind Ltd	Mona Offshore Wind Ltd	14 Jan 2025

Prepared by:

RPS

Prepared for:

Mona Offshore Wind Ltd.

Contents

RESPONSE TO NRW D6 SUBMISSION 1

1 RESPONSE TO NATURAL RESOURCES WALES D6 SUBMISSION 1
1.1 Introduction 1

2 RESPONSE NRW D6 SUBMISSION 2
2.1 Natural Resources Wales – Marine Ornithology 2
2.2 Natural Resource Wales – Marine Mammals 11
2.3 Natural Resources Wales – Fish and Shellfish 16
2.4 Natural Resources Wales – Physical Processes 18
2.5 Natural Resources Wales – Benthic Subtidal and Intertidal Ecology 21
2.6 Natural Resources Wales – Marine Water and Sediment Quality 22
2.7 Natural Resources Wales – WFD: Coastal and Transitional Water Bodies – Offshore Works 23
2.8 Natural Resources Wales – Designated Landscapes 24
2.9 Natural Resources Wales – WFD Compliance Assessment: Onshore Works 27
2.10 Natural Resources Wales – Air Quality 28
2.11 Natural Resources Wales – Ecology (Terrestrial) 29
2.12 Natural Resources Wales – Water Quality (Surface and Groundwater) 33
2.13 Natural Resources Wales – Flood Risk 34
2.14 Natural Resources Wales – Materials and Waste 35
2.15 Natural Resources Wales – Marine Licensing 36

Tables

Table 2.1: REP6-137 Natural Resources Wales – Marine Ornithology 2
Table 2.2: REP6-137 Natural Resources Wales - Marine Mammals 11
Table 2.3: REP6-137 Natural Resources Wales - Fish and Shellfish 16
Table 2.4: REP6-137 Natural Resources Wales - Physical Processes 18
Table 2.5: REP6-137 Natural Resources Wales - Benthic Subtidal and Intertidal Ecology 21
Table 2.6: REP6-137 Natural Resources Wales - Marine Water and Sediment Quality (MW&SQ) 22
Table 2.7: REP6-137 Natural Resources Wales – WFD: Coastal and Transitional Water Bodies – Offshore Works 23
Table 2.8: REP6-137 Natural Resources Wales - Designated Landscapes 24
Table 2.9: REP6-137 Natural Resources Wales – WFD Compliance Assessment: Onshore Works 27
Table 2.10: REP6-137 Natural Resources Wales – Air Quality 28
Table 2.11: REP6-137 Natural Resources Wales - Ecology (Terrestrial) 29
Table 2.12: REP6-37 Natural Resources Wales – Water Quality (Surface and Groundwater) 33
Table 2.13: REP6-37 Natural Resources Wales – Flood Risk 34
Table 2.14: REP6-37 Natural Resources Wales – Materials and Waste 35
Table 2.15: REP6-37 Natural Resources Wales - Marine Licensing 36

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 Natural Resources Wales D6 Submission

1.1 Introduction

1.1.1.1 The Applicant has responded to NRW's Deadline 6 submission below.

2 Response NRW D6 Submission

2.1 Natural Resources Wales – Marine Ornithology

Table 2.1: REP6-137 Natural Resources Wales – Marine Ornithology

Planning Inspectorate Ref. No.	Written Submission Comment	Applicant's response
REP6-137.1	1. We welcome the additional work undertaken by the Applicant in REP5-074 and REP5-075 to update the cumulative and in-combination assessments to include the following: • Updated Morgan Generation Assets (GA) and Morecambe GA project figures to account for the best available evidence from the application submissions rather than the figures from the Preliminary Environmental Information Reports (PEIRs). • Addition of predicted impacts from the Llŷr 1 project.	The Applicant welcomes NRW (A)'s comments and can confirm that the application numbers for the Morgan Generation Assets, Morecambe Generation Assets and Llŷr 1 Floating offshore wind project have been included in the Volume 2, Chapter 5: Offshore ornithology (F2.5 F04) and HRA Stage 2 Information to Support an Appropriate Assessment (ISAA) Part Three: Special Protection Areas (SPAs) and Ramsar sites Assessments (E1.3 F03) (including Annex E1.3.1 Offshore ornithology ISAA Supporting Information (E1.3.1)) at Deadline 7. The relevant updates were shared with NRW (A) via email on 8 January 2025 to enable NRW (A) to have regard to this information in their final submission at Deadline 7.
REP6-137.2	2. We welcome that the Applicant has undertaken an alignment task (i.e. a review of the data used by Mona and Morgan projects in the Cumulative Effects Assessment (CEA) to ensure numbers used for the other projects in the CEAs are as consistent as possible) on CEA abundances/impacts used between the Mona Offshore Wind Project and Morgan GA projects. Therefore, we welcome the amendments the Applicant has made to the predicted collision impacts for herring gull for Burbo Bank Extension and for lesser black-backed gull (LBBG) for TwinHub as a result of this work.	The Applicant welcomes NRW (A)'s comments and highlights that further information with regard to the differences between the Mona Offshore Wind Project and Morgan Generation Assets cumulative effects assessments is presented in the Offshore Ornithology Final Position Paper (S_D7_6) submitted at Deadline 7.
REP6-137.3	3. We are content with the Applicant's removal of the predicted great black-backed gull (GBBG) collision impact from West of Orkney Wind Project from the cumulative total as noted in REP5-075. This is because this project is not located within the same GBBG Biologically Defined Minimum Population Scale (BDMPS) as the Mona Offshore Wind Project (South West and Channel BDMPS). Therefore, we agree that the West of Orkney Wind Project has no connectivity throughout the whole year with the GBBG South West and Channel BDMPS.	The Applicant welcomes NRW (A)'s comments and confirmation that the West of Orkney Wind Project has no connectivity throughout the whole year with the great black-backed gull South West and Channel Biologically Defined Minimum Population Scale.

Planning Inspectorate Ref. No.	Written Submission Comment	Applicant's response
REP6-137.4	4. We advise that the standard approach to cumulative and in-combination assessments is to use the consented parameters of each project and to refer to the worst-case scenario (WCS) assessed within the relevant Environmental Statement (ES), taking account of any updated assessments provided throughout the examination process. Additionally, NRW (A) advise the use of the species-group avoidance rates. Therefore, we have based our comments/advice on the indicative cumulative (and in-combination) collision predictions based on the figures using the species-group avoidance rates, and the consented wind farm parameters where these are available, and; the asbuilt parameters where consented information is unavailable.	The Applicant notes NRW(A)'s comments.
1.1.1.1 Comments on updated cumulative assessments in REP5-075		
REP6-137.5	5. We note that the predicted abundances and collision estimates for each offshore wind project included in the cumulative assessments are now located across multiple documents: • Figures for projects with quantitative data available from their submissions are 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 GA are included in Table 1-1 of REP5-075; • Figures include 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 LBBG respectively are located in Tables 1-17 and 1-18 of REP5-075.	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. These documents are included in Schedule 15 of the draft DCO (C1 F08) as part of the Environmental Statement for certification by the Secretary of State. 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.
REP6-137.6	6. We would therefore recommend that by the end of the examination the Applicant either: submits an updated Offshore Ornithology ES Chapter that includes full cumulative abundance and collision tables (including the	

Planning Inspectorate Ref. No.	Written Submission Comment	Applicant's response
	quantitative impacts for each project in the cumulative assessments), or alternatively a standalone EIA cumulative tables document that brings all this information project by project together for each species. This is in order to bring all these numbers feeding into the cumulative assessments into one place that is readily and easily accessible for future projects to utilise this information.	
1.1.1.2 Comments on updated in-combination assessments in REP5-074		
REP6-137.7	7. We welcome that in REP4-074 the Applicant has provided updated incombination assessments incorporating all SNCB advice for the Welsh Special Protection Areas (SPAs) and features identified as having outstanding issues. We agree with the approach taken in REP5-074 to age-class proportions during the breeding season and the consideration of projects which have submitted consent applications since the in-combination assessment for the Mona Offshore Wind Project was undertaken (namely Morgan GA, Morecambe GA, and Llŷr 1).	The Applicant welcomes NRW (A)'s comments. The Applicant also directs NRW (A) to the response in row REP6-137.1 and REP6-137.5.
1.1.1.2.1 SPA population estimates used in baseline mortality calculations in REP5-074		
REP6-137.8	8. In section 1.4.1 of REP5-074, we note that the Applicant has updated the SPA population estimates used in the calculations of baseline mortality to the most recent site counts, which for all species considered with the exception of Manx shearwater, are colony counts from 2024. Whilst we appreciate this represents the most up to date information on the colony populations, we note that they are not contemporaneous with the Mona site-specific baseline surveys (undertaken between March 2020 until February 2022) used to calculate estimated mortality impacts. We consider that it is important to use contemporaneous data in order to be comparing like-for-like impacts against populations. This is particularly important should there be a large change in a colony population after baseline surveys have been carried out. For example, the Highly Pathogenic Avian Influenza (HPAI) outbreak caused large numbers of mortalities in summer 2022 and 2023 with the Grassholm SPA gannet colony having been severely affected: with a 52% reduction in nesting pairs from 2022 to 2023 (Johnstone et al. 2022). This is reflected in Seabird Monitoring Programme (SMP) counts showing 78,584 adults in 2009 and 72,022 in 2015, then just	The Applicant notes NRW (A)'s comments and confirms that a Revised Assessment for Northern Gannet at Grassholm SPA (REP6-088) was submitted at Deadline 6 to address NRW (A)'s concerns on the Grassholm assessment. In addition, regard has been given to NRW (A)'s comments in the updated HRA Stage 2 ISAA Part Three: SPAs 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 information presented in the Revised Assessment for Northern Gannet at Grassholm SPA (REP6-088) has been incorporated into the Offshore ornithology ISAA Supporting Information (E1.3.1 F01) Annex; • 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

Planning Inspectorate Ref. No.	Written Submission Comment	Applicant's response
	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 and advise that the Grassholm SPA Gannet assessment use the 2015 colony count of 72,022 adults. We suggest that impacts from the HPAI outbreak are considered within a narrative around predicted impacts.	• 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 NRW (A)'s agreement with the conclusion of the HRA in-combination assessment for Skomer, Skokholm and the Seas off Pembrokeshire/Sgomer, Sgogwm a Moroedd Penfro (SSSP) SPA. NRW (A) confirmed via email on 9 January 2025 that they are able to rule out adverse effect on integrity for all Welsh sites designated for offshore ornithology features (including Grassholm SPA) for the Mona Offshore Wind Project in-combination with other projects and plans. This agreement is reflected in row NRW.HRA.38 and NRW.HRA.39 of the Statement of Common Ground (SoCG) between Mona Offshore Wind Project and the NRW (Advisory)-Offshore (S_D1_12 F03) submitted at Deadline 7.
REP6-137.9	9. However, we note that using the most recent 2024 colony counts does not make a substantial difference to the results of the in-combination assessment with regard to the features of the Skomer, Skokholm and the Seas off Pembrokeshire/Sgomer, Sgogwm a Moroedd Penfro (SSSP) 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. It should be noted that this issue of contemporaneous data does not apply to the Manx shearwater features of the sites considered, as the colony populations used by the Applicant for this species are the most recent available counts (2015 for Aberdaron Coast and Bardsey Island SPA and 2018 for SSSP SPA).	
1.1.1.2.2 Grassholm SPA: Gannet in-combination assessments		
REP6-137.10	10.Having reviewed the Applicant's Deadline 5 submissions, NRW (A) have some concerns regarding the Applicant's current conclusions with regard to site integrity for the Grassholm gannet SPA in-combination assessments. We have discussed these concerns on an urgent call with the Applicant on 16 December 2024. During this call we noted that there were several elements of the Applicant's assessment that could be considered overly precautionary and could lead to misleading conclusions with respect to site integrity, specifically:	The Applicant submitted a Revised Assessment for Northern Gannet at Grassholm SPA (REP6-088) at Deadline 6 to address NRW (A)'s concerns on the Grassholm SPA northern gannet assessment. The Revised Assessment for Northern Gannet at Grassholm SPA has been subsequently incorporated into the HRA Stage 2 ISAA Part Three: SPAs and Ramsar sites Assessments Annex E1.3.1 Offshore ornithology ISAA Supporting Information (E1.3.1) at Deadline 7. NRW (A) have confirmed via email on 9 January 2025 that they are able to rule out adverse effect on integrity for

Planning Inspectorate Ref. No.	Written Submission Comment	Applicant's response
	• Use of the 2024 colony count, which is not contemporaneous with the site-specific survey data (as detailed above). • We note that tracking data (e.g. from Votier et al. 2010) and utilisation distributions (e.g. Wakefield et al. 2013) suggest that gannets have been shown to display spatial segregation between colonies and that it is unlikely that gannets from Grassholm SPA will forage in the Irish Sea area. Therefore, it is likely that the breeding season apportionment values calculated by the Applicant for the wind farms located in the Irish Sea and hence the apportioned in-combination collision, displacement and hence combined collision + displacement impacts to the colony in the Applicant's assessment are overly precautionary. • It appears that the Applicant has not considered any accounting for macro avoidance of gannet in the in-combination collision assessment for this site. Therefore, if this is the case, it is likely that the gannet indicative in-combination collision total and hence combined collision + displacement total presented in Table 1.13 of REP5-074 could be an overestimate. • Additionally, gannet has a large foraging range (mean-maximum of 516.7km for Grassholm SPA, Woodward et al. 2019) and has a high habitat flexibility (Furness & Wade 2012) suggesting that displaced birds would readily find alternative habitats including foraging areas. Therefore, it is considered unlikely that in-combination displacement mortality rates would be at the top of the range considered and may be more likely to be towards the lower end of the range.	Grassholm SPA northern gannet feature for the Mona Offshore Wind Project in-combination with other projects and plans. This agreement is reflected in row NRW.HRA.38 and NRW.HRA.39 of the SoCG between Mona Offshore Wind Project and the NRW (Advisory)- Offshore (S_D1_12 F03) at Deadline 7.
REP6-137.11	11.Given the concerns raised above, we cannot rule out Adverse Effect on Site Integrity (AEoSI) for gannet from the Grassholm SPA at this stage. However, following the call on 16 December 2024, we understand that the Applicant intends to submit at Deadline 6 an updated assessment that takes the points raised at para 10 above into consideration. Whilst we cannot rule out AEoSI until this matter is rectified, we do anticipate that the remaining issues are capable of being resolved before the close of Examination, and consider that it is unlikely that a derogation and compensation case would be required for this site. However, we cannot	

Planning Inspectorate Ref. No.	Written Submission Comment	Applicant's response
	definitively confirm this until we have given a full and comprehensive review of the additional information the Applicant intends to submit at Deadline 6.	

1.1.2 Summary of NRW (A) Advice for EIA and Habitats Regulations Assessment (HRA) Scale

REP6-137.12

12.NRW (A) has reviewed the evidence presented in REP5-074, REP5-075 and have interpreted the predicted indicative impacts for the scenarios we consider most appropriate impacts (i.e. those including the gap filled figures for historical projects, other updates to figures for other projects, additional project figures, and specifically for collision risk, the predictions based on the figures using the species-group avoidance rates and the consented wind farm parameters where these are available, and; the as-built parameters where consented information is unavailable). A summary of our advice is presented in Table 1 and detailed advice around how these conclusions for outstanding issues were reached are set out in Appendix 1 for EIA scale and Appendix 2 for HRA scale.

Table 1: Summary of conclusions for assessments of the Mona project alone and cumulatively at EIA scale and in-combination for HRA scale with other plans and projects for relavent species

EIA Species	Mona Project Alone*	Mona cumulatively with other plans & projects
Gannet: collision	No significant adverse impact	No significant adverse impact
Gannet: displacement	No significant adverse impact	No significant adverse impact
Gannet: collision + displacement	No significant adverse impact	No significant adverse impact
Kittiwake: collision	No significant adverse impact	No significant adverse impact
Lesser black-backed gull: collision	No significant adverse impact	No significant adverse impact
Herring gull: collision	No significant adverse impact	No significant adverse impact
Great black-backed gull: collision	No significant adverse impact	Unable to rule out significant adverse impact

The Applicant welcomes NRW (A)'s agreement with the Applicant's conclusions of significance of impacts at a cumulative scale to all species besides great black-backed gull. For this species, NRW (A) has previously confirmed that the mitigation from the Mona Offshore Wind Project is sufficient for this species (see Comments on Submissions received at Deadline 3 (REP4-105)). This agreement is captured in row NRW.OO.19 of the SoCG between Mona Offshore Wind Project and the NRW (Advisory)- Offshore (S_D1_12 F03) at Deadline 7.

The Applicant welcomes NRW (A)'s agreement with conclusion of the HRA in-combination assessment that there will be no adverse effect on integrity for SPAs designated for offshore ornithology features (including Grassholm SPA northern gannet feature which was confirmed by NRW (A) to the Applicant via email on 9 January 2025) for any impacts for the Mona Offshore Wind Project in-combination with other projects and plans. This agreement is reflected in row NRW.HRA.38 and NRW.HRA.39 of the SoCG between Mona Offshore Wind Project and the NRW (Advisory)- Offshore (S_D1_12 F03) at Deadline 7.

Guillemot: displacement	No significant adverse impact	No significant adverse impact
Razorbill: displacement	No significant adverse impact	No significant adverse impact
Puffin: displacement	No significant adverse impact	No significant adverse impact
Manx shearwater: displacement	No significant adverse impact	No significant adverse impact
HRA species and site	**Mona Project Alone**	**Mona in-combination with other plans & projects**
Skomer, Skokholm & seas off Pembrokeshire (SSSP) SPA, Manx shearwater: displacement	No AeoSI**	No AeoSI
SSSP SPA, Puffin: displacement	No AeoSI**	No AeoSI
SSSP SPA, Lesser black-backed gull: collision	No AeoSI**	No AeoSI***
SSSP SPA, European storm petrel	No AeoSI***	No AeoSI***
SSSP SPA, guillemot (named component of seabird assemblage): displacement	No AeoSI**	No AeoSI
SSSP SPA, razorbill (named component of seabird assemblage): displacement	No AeoSI**	No AeoSI

SSSP SPA, kittiwake (named component of seabird assemblage): collision	No AeoSI**	No AEoSI
SSSP SPA, seabird assemblage: collision and displacement	No AeoSI**	No AeoSI
Grassholm SPA, gannet: collision	No AeoSI**	Unable to confirm until have fully reviewed additional information Applicant intends to submit at Deadline 6
Grassholm SPA, gannet: displacement	No AeoSI**	No AeoSI
Grassholm SPA, gannet: collision + displacement	No AeoSI**	No AeoSI
Aberdaron Coast & Bardsey Island SPA, Manx shearwater: displacement	No AeoSI**	No AeoSI
Liverpool Bay SPA: red-throated diver	No AeoSI	No AeoSI
Liverpool Bay SPA: common scoter	No AEoSI	No AeoSI

* Based on advice provided in REP3-090 (see Appendix 1 of Annex A) and in REP4-105 (see Annex B)

** Based on advice provided in REP4-105 (see Annex B)

*** Based on response to RIES question in paragraph 4.1.7 – see paragraph 17 of REP5-099

2.2 Natural Resource Wales – Marine Mammals

Table 2.2: REP6-137 Natural Resources Wales - Marine Mammals

Planning Inspectorate Ref. No.	Written Submission Comment	Applicant's response
REP6-137.13	13.Other than the points raised below, we have no further comments to make at this stage with respect to Marine Mammals.	The Applicant welcomes this comment.
1.2.1 Comments on Draft Development Consent Order REP5-006		
REP6-137.14	14.We welcome the Applicant's decision to remove high-order clearance from the draft Development Consent Order (DCO) and the standalone Marine Licence (ML) application in Schedule 14, Condition 21(1) of the draft DCO [REP5-006].	The Applicant notes and welcomes these comments, which are reflected in row NRW.MM.17 of the Mona and NRW (A) Offshore Statement of Common Ground (S_D1_12 F03) for the project alone, and NRW.MM.16 of the Mona and NRW (A) Offshore Statement of Common Ground (S_D1_12 F03) for agreement of the assessment of cumulative effects.
REP6-137.15	15.As noted in NRW's Deadline 5 Submission [REP5-098], our position on the use of different UXO clearance methods (low-order cf high-order) are clearly stated in our written representations [REP1-056], and we confirm that our view remains that all UXO clearance is restricted to low-noise methods only, and that high order clearance should only be used in exceptional circumstances. We are therefore pleased to note that high order clearance is being removed as an option from the project at this stage.	
REP6-137.16	16.As previously noted, NRW is currently a signatory to the 2022 Joint Interim Position Statement on UXO Clearance. We once again draw attention to the pending update to the Position Statement on UXO clearance that is currently in development (and which NRW has contributed to), and which may be published prior to the completion of this examination process. For the avoidance of doubt, we are currently unable to confirm when the position will likely be published, however should this be published during the examination process we will draw the ExA and the Applicant's attention to this document immediately.	The Applicant welcomes NRW's notification of an updated Joint Position Statement on UXO clearance to be published and will review the guidance when it becomes available.

Planning Inspectorate Ref. No.	Written Submission Comment	Applicant's response
1.2.2 Comments on: the Mitigation and Monitoring Schedule REP5-024, the Offshore In-Principle Monitoring Plan REP5-026, and the Marine Licence Principles Document REP5-022		
REP6-137.17	17.We acknowledge and agree to the changes made to the documents.	The Applicant welcomes this comment, which is reflected in row NRW.MM.19 and NRW.MM.20 of the Mona and NRW (A) Offshore Statement of Common Ground (S_D1_12 F03).
1.2.3 Comments on the updated Outline Underwater Sound Management Strategy REP5-028		
REP6-137.18	18.Please see NRW MLT's comments at paragraph 86 in section 3, on the complete removal of UXO clearance activities from Requirement 20 of the dML governing the Underwater Sound Management Strategy (UWSMS). We echo these concerns and continue to advise that the UWSMS, which includes details regarding UXO clearance, must be submitted for approval in writing, postconsent and prior to construction. UXO clearance needs to be included within Requirement 20.	It is the Applicant's position that low-order UXO clearance can be fully mitigated via measures in the Outline MMMP (REP5-032) and therefore the final UWSMS is not required for low order clearance. However, consideration has been given to NRW MLT's comments (in REP6-137.86 below) and as the MMMP is an annex to the UWSMS, the Applicant appreciates the logic of including the UWSMS as part of the approval process to commence UXO clearance. As such, Condition 20 of the Draft DCO (C1 F08) has been updated at Deadline 7 to include low-order UXO clearance. The Applicant wishes to highlight that the Outline UWSMS (REP5-028) contains UXO clearance in the event that high order clearance is required, in which a separate ML would be applied for and the UWSMS would be submitted for approval in writing, post-consent, prior to any intentional detonation of UXO. The inclusion of UXO clearance in the Outline UWSMS (REP5-028) allows SNCBs prior consideration of the plan and supports a separate ML if required.
REP6-137.19	19.We welcome the Applicant's decision to remove high-order clearance from the draft DCO and the standalone ML application in Schedule 14, Condition 21(1) of the draft DCO [REP5-006]. As noted above at paragraph 15, our position on the use of different UXO clearance methods (low-order cf high-order) are clearly stated in our written representations [REP1-056], and we confirm that our view remains that all UXO clearance is restricted to low-noise methods only, and that high order clearance should only be used in exceptional circumstances.	Please see the Applicant's response in row REP6-137.14.
REP6-137.20	20.Please also see paragraph 16 above with respect to the DEFRA Joint Interim Position Statement on UXO clearance and its pending update.	Please see the Applicant's response in row REP6-137.16.

Planning Inspectorate Ref. No.	Written Submission Comment	Applicant's response
REP6-137.21	21.As noted in REP1-056, we continue to advise that we do not recommend the proposed use of soft start charges for UXO clearance due to the substantial additional impulsive noise they introduce into the environment (Robinson et al. 2022), and their scaring effect not being proven (Lewis 1996; Keevin and Hempen 1997, Cheong et al. 2020). We acknowledge the Applicant's response in REP2-080, and advise that we will continue to engage with the Applicant on this matter post-consent in development of the UWSMS.	The Applicant notes this comment and welcomes the opportunity to continue engagement with NRW (A) post-consent on the development of the final UWSMS.
REP6-137.22	22.We welcome and agree with the amendments made to clarify the primary and tertiary measures adopted as part of the Mona OWF.	The Applicant notes these comments and welcomes the opportunity to continue engagement with NRW (A) post-consent on the development of the final UWSMS.
REP6-137.23	23.Please see NRW (A)'s previous comments on the UWSMS as documented in REP1-056, REP3-090 and REP4-047.	
1.2.4 Comments on the Outline Marine Mammal Mitigation Protocol REP5-032		
REP6-137.24	24.NRW(A) agrees with the changes made to the outline Marine Mammal Mitigation Protocol (MMMP).	The Applicant welcomes these comments.
REP6-137.25	25.We welcome the Applicant's decision to remove high-order clearance from the draft DCO and the standalone ML application in Schedule 14, Condition 21(1) of the draft DCO.	
REP6-137.26	26.We noted in our Written Representations that the Applicant should follow a proportionate application of Acoustic Deterrent Devices (ADD's). We therefore welcome the addition of the following in section 1.6.4.1 "…and will consider carefully the ADD duration to balance the risk of injury with any potential further disturbance from the ADD itself to ensure a proportionate and judicial application."	
REP6-137.27	27.Finally, we welcome the inclusion of proposed mitigation for geophysical surveys in the outline MMMP.	
1.2.5 Comments on the Measures to Minimise Impacts to Marine Mammals and Rafting Birds from Transiting Vessels REP5-073		
REP6-137.28	28.No additional comments from a marine mammal perspective.	The Applicant welcomes this comment.

Planning Inspectorate Ref. No.	Written Submission Comment	Applicant's response
1.2.6 Comments on the Applicant's Response to NRW D4 Submission REP5- 061		
REP6-137.29	29.REP4-105.39 to REP4-105.48: NRW (A) confirms that matters relating to disturbance to marine mammals from vessel noise, were discussed further with the Applicant on 8 and 26 November 2024 and both parties agreed that 'a single point in time' is an accurate and appropriate representation of the assessment methodology. For the avoidance of doubt, we would appreciate if the Applicant can clarify whether the statement "(i.e. within a 24 hour period)" refers to a single point in time within those 24 hours.	As per the Applicant's response in REP5-061, the modelled ranges used in Volume 2, Chapter 4: Marine Mammals (APP-056) are based on cumulative sound exposure levels (SELcum) based on 24 hours continuous operation, and therefore clarifies the statement "a single point in time (i.e. within a 24 hour period)" refers to this modelled period within the context of the relevant longer phase of the Mona Offshore Wind Project (e.g. construction phase, operations phase), rather than a specific single point in time within those 24 hours. The Applicant considers 24 hours to be a suitable period for modelling vessel sound to facilitate conservative estimates of disturbance and allow a robust proportionate assessment.
REP6-137.30	30. While we agree with the Applicant that there are currently no widely adopted methods to model cumulative disturbance from vessels outside of the North Sea, as noted in our Deadline 5 submission [REP5-098], the most recent version of the DEPONS model for simulating population effects of noise for harbour porpoises (V3.0) now makes it possible to simulate the population impact of noise from ships (albeit limited in scope to the North Sea). Similarly work is being done to further develop Dynamic Energy Budget (DEB) models for their eventual inclusion into the Interim Population Consequences of Disturbance (iPCoD) framework (Harwood et al 2022), noting that King et al (2015) suggested that other impact pathways (such as noise from seismic surveys and / or vessels) can be included into iPCoD by using estimates of the number of animals predicted to be disturbed by these activities and their extent in time and space. We highlight these models for awareness purposes only and advise that no additional work is required by the Applicant on this matter.	The Applicant notes NRW (A)'s comments on the development of the DEPONS2 model and Interim Population Consequences of Disturbance (iPCoD) framework and will consider these for potential future projects. The Applicant highlights the limitations of the DEPONS model currently with application to the North Sea only and therefore should not be applied to the Irish Sea populations. The Applicant welcomes NRW (A)'s confirmation that no additional work is required by the Applicant on this matter.
REP6-137.31	31.Given that agreement was reached on a way forward, pending response to our final query at paragraph 29 above, we anticipate being able to close this matter.	The Applicant welcomes this comment, which is reflected in row NRW.MM.15 of the Mona and NRW (A) Offshore Statement of Common Ground (S_D1_12 F03).
REP6-137.32	32.REP4-105.49: Noted, we have no further comments on the CEA and InCombination Assessment and consider the matter closed.	The Applicant welcomes this comment, which is reflected in rows NRW.MM.16, NRW.MM.18 and NRW.HRA.29 of the Mona and NRW (A) Offshore Statement of Common Ground (S_D1_12 F03).

Planning Inspectorate Ref. No.	Written Submission Comment	Applicant's response
1.2.7 Comments on the Applicant's Response to Examining Authority's Written Questions (ExQ2) REP5-080		
REP6-137.33	33.Q2.17.12: As noted above at paragraph 14, we welcome the Applicant's decision to remove high-order clearance from the draft DCO and the standalone ML application.	The Applicant welcomes this comment.
REP6-137.34	34.As previously noted above, should the DEFRA Position Statement on UXO clearance be published ahead of the end of examination, we will alert the ExA and Applicant accordingly.	Please see the Applicant's response in row REP6-137.16.
REP6-137.35	35.We acknowledge and welcome the Applicant's statements in response to Q2.17.12 that: (a) the Applicant will review and align with any new guidance when this becomes available; (b) The MMMP and UWSMS approach is purposely designed to enable the Applicant to take into account any emerging guidance or policy requirements with respect to mitigation during the preparation of the final MMMP and UWSMS post consent, which must be approved in writing by the licensing authority in consultation with the relevant stakeholders.	The Applicant welcomes this comment.
REP6-137.36	36.Q2.17.16: relates to mitigation and monitoring measures for marine mammals. Further to the Applicant's response to Q2.17.16, we have no additional comments to make and confirm our previous response from our written representations [REP1-056] with respect to monitoring requirements).	The Applicant welcomes this comment.

2.3 Natural Resources Wales – Fish and Shellfish

Table 2.3: REP6-137 Natural Resources Wales - Fish and Shellfish

Planning Inspectorate Ref. No.	Written Submission Comment	Applicant's response
REP6-137.37	37.13. Other than the points raised below, we have no further comments to make at this stage with respect to Fish and Shellfish.	The Applicant welcomes this comment.
1.3.1 Comments on the Draft Development Consent Order REP5-006		
REP6-137.38	38.NRW (A) welcomes the removal of the high order clearance from the draft DCO and from the stand-alone ML. We therefore have no further comments on this matter from a fish perspective.	The Applicant welcomes this comment.
1.3.2 Comments on the Mitigation and Monitoring Schedule REP5-024		
REP6-137.39	39.NRW (A) welcomes the amendments made to the Schedule, which rectify previous referencing omissions with respect to appropriate consideration of the fish and shellfish document in the schedule. We therefore have no further comments.	The Applicant welcomes this comment.
1.3.3 Comments on the Outline Underwater Sound Management Strategy (UWSMS) REP5-028		
REP6-137.40	40.NRW (A) welcomes the changes that have been made to the UWSMS, and consider that, in continuing to develop the UWSMS post-consent, appropriate mitigation can be reached for both cod and herring through this mechanism.	The Applicant welcomes that NRW (A) agree that appropriate mitigation can be reached for both cod and herring through the UWSMS. The measures considered will be reviewed when drafting the final UWSMS in consultation with NRW (A) and the JNCC post consent. If further evidence of the efficacy of the selected measures is required, if any measures are required, this will be discussed with NRW (A) and the JNCC post consent.
REP6-137.41	41.Some of the measures that have been included within the document as suggested mitigation for fish may, in further developing the strategy postconsent, require further evidence as to their efficacy. For example, spatial phasing in which reduced levels of piling are undertaken during spawning seasons.	
REP6-137.42	42.For Herring, for example, given the latest ICES advice of 0 catch of herring in the northern Irish sea (region VII a) in 2025 and their advice that activities on spawning grounds should not be allowed until the effects have	

Planning Inspectorate Ref. No.	Written Submission Comment	Applicant's response
	been shown not to be detrimental (Herring (Clupea harengus) in Division 7.a North of 52°30'N (Irish Sea), ICES, 2024)1 , suggested mitigation measures such as spatial or temporal phasing with a reduction on piling activities in the spawning season may not be robust enough as mechanisms on their own to protect spawning herring. Whilst the Mona array is not directly positioned on a known spawning ground, the modelled noise impacts are due to reach the herring low and high intensity grounds to the north of the mona boundary (when modelled using piling activity to the north of the proposed array). As noise disturbance could have a detrimental impact on spawning activities, implementing mitigation practices such as conducting piling in a different segment of the mona array area during the spawning season may not reduce the noise level by a large enough amount to reduce disturbance. Should the Applicant, however, have noise modelling scenarios based on a piling location to the south of the array, this may provide evidence for the use of spatial phasing, with reduced piling activities that may be suitable for herring.	
REP6-137.43	43.As previously advised, in NRW (A)'s view, the most robust mitigation would be temporal phasing in which piling activities are not conducted (rather than just reduced) during the spawning season for both herring and cod. We do note this is now included as a potential measure within the updated document, which we welcome.	
REP6-137.44	44.NRW (A) acknowledges that the proposed mechanisms included in the UWSMS are suggestions at present and further detail and consultation with NRW (A) will be carried out following the conclusion of the examination period during the post-consent phase.	
1.3.4 Comments on the Applicant's Response to NRW D4 Submission REP5- 061		
REP6-137.45	45.NRW (A) welcomes the corrections made to the Mitigation and Monitoring schedule and the commitment by the Applicant to continue reviewing the document as necessary.	The Applicant welcomes this comment. The Applicant has also submitted the Mitigation and Monitoring Schedule (J10 F07) with minor corrections at Deadline 7.

2.4 Natural Resources Wales – Physical Processes

Table 2.4: REP6-137 Natural Resources Wales - Physical Processes

Planning Inspectorate Ref. No.	Written Submission Comment	Applicant's response
REP6-137.46	46.Other than the points raised below, we have no further comments to make at this stage with respect to Physical Processes.	The Applicant welcomes this comment.
1.4.1 Comments on the Mitigation and Monitoring Schedule REP5-024		
REP6-137.47	47.Reference No 8 and No 14: Please see our comments in REP5-098 paragraphs 72 and 76, with respect to physical processes assessments in the shallow nearshore environment.	The Applicant notes and welcomes this comment.
1.4.2 Comments on Mona Offshore In-Principle Monitoring Plan REP5-026 Table 1.3 In-Principle Monitoring proposed for physical processes		
REP6-137.48	48.We advise that throughout Table 1.3 of REP5-026, references are made to sections of the Mitigation and Monitoring Schedule [REP5-024], which refer to the incorrect mitigation and/or monitoring measures, which are not relevant to physical processes e.g. Reference Number 88 refers to Personal Protective Equipment (PPE). As noted in our Written Representation [REP1-056], such errors can lead to confusion and uncertainty as to the exact measures to be secured. We therefore advise that the references throughout the REP5-026 and REP5-024 are corrected accordingly, and that the mitigation and/or monitoring approaches and methods of securing monitoring are aligned and consistent throughout documents. With respect to Physical processes, our observations of these errors relate to pre-construction geophysical surveys to establish baseline sand wave levels, and post-construction geophysical surveys to establish sand wave recovery following cable installation, particularly in relation to Constable Bank.	The Applicant notes and welcomes this comment. The Offshore In-Principle Monitoring Plan (J15 F03) has been updated to correct these errors and submitted at Deadline 7.
1.4.3 Comments on the Applicant's Response to NRW D4 Submission REP5- 061		
REP6-137.49	49.REP4-105.57: As advised in our Deadline 3 Submission [REP3-090], section 1.4, paragraph 102, NRW (A) notes and welcomes the intention of	The Applicant notes and welcomes this comment.

Planning Inspectorate Ref. No.	Written Submission Comment	Applicant's response
	the Applicant to try and avoid cable protection in shallow water. We continue to advise that providing the proposed mitigation measure is strictly adhered to - i.e. no more than a 5% reduction in water depth at any point where cable protection is placed - we are satisfied that there should be no significant impacts to the physical processes in the shallow nearshore environment.	
REP6-137.50	50.As previously noted, we welcome the Applicant's expectation that a condition will be imposed within the standalone NRW ML securing the commitment to limit changes in water depth to 5% caused by the presence of cable protection along the export cable corridor up to and including the exit pits just seaward of MLWS. We have advised that this commitment should be captured in both the DCO dML and the TA ML via the offshore Construction Method Statement (oCMS) and the Cable Specification Installation Plan (CSIP). We continue to advise that NRW (A) are consulted in writing on these documents. We agree that where that restriction is anticipated to be exceeded in the nearshore shallow water environment, the Applicant will consult with NRW (A) in respect of agreeing an alternative position. This commitment should also be conditioned in the stand-alone ML and secured in the Mitigation and Monitoring Schedule [REP5-024]. Providing the commitment and condition are secured in both the DCO dML and TA ML, NRW (A) consider this matter resolved.	The Applicant notes and welcomes this comment.
REP6-137.51	51.REP4-105.58 and REP4-105.59 Q1.14.4 Sandwave Recovery Monitoring. We welcome that the Applicant is committed to monitoring sand wave clearance recovery, which is documented in Table 1.3 of the Offshore In-Principle Monitoring Plan [REP5-026]. Please note our comments above in paragraph 48 regarding inconsistencies across documents. For consistency and clarity purposes, we advise that these errors are corrected and REP5-026 is amended to reflect the commitment to monitoring sand wave recovery following clearance, and that REP5-026 and REP5-024 are aligned.	The Applicant notes and welcomes this comment. The Offshore In-Principle Monitoring Plan (J15 F03) has been updated to correct these errors and submitted at Deadline 7.

1.4.4 Comments on the Applicants Mona Outline Landfall Construction Method Statement REP5-044

Planning Inspectorate Ref. No.	Written Submission Comment	Applicant's response
REP6-137.52	52.NRW (A) welcome the Applicant's commitment, detailed in section 1.10.3.2 of REP5-044, that account will also be given to the natural envelope of beach profile change over time from historical beach profiles to inform the final detailed design of the drill duct profile to avoid the risk of cable exposure at the beach. We therefore have no further comments.	The Applicant welcomes this comment.

2.5 Natural Resources Wales – Benthic Subtidal and Intertidal Ecology

Table 2.5: REP6-137 Natural Resources Wales - Benthic Subtidal and Intertidal Ecology

Planning Inspectorate Ref. No.	Written Submission Comment	Applicant's response
REP6-137.53	53.Other than the points raised below, we have no further comments to make at this stage with respect to benthic subtidal and intertidal ecology.	The Applicant welcomes this comment.
1.5.1 Comments on the Outline Landfall Construction Method Statement REP5- 044		
REP6-137.54	54.We note the text in Section 1.10; paragraphs 1.10.4.5 - 1.10.4.7 of REP5-044 with respect to the location of the drill entry and exit points at landfall. As the exit pits are located sub-tidally, seaward of Mean Low Water Springs (MLWS), NRW (A) recommends that the text in this section is updated to reflect this as many of the measures described (such as the use of construction fencing and a settling basin at the drill exit) are not applicable or relevant in this instance. Details of what will happen to the drilling mud at the exit point should be described instead.	The Applicant notes the comment. The scope of the Outline Landfall Construction Method Statement seeks to manage potential impacts that occur landward of Mean Low Water Springs (MLWS) to the Transition Joint Bay. The Outline Landfall Construction Method Statement has been updated at Deadline 7 (J26.14 F05) to remove reference to drill exit pits, which will located seaward of MLWS. Control measures for the drill exit pits, including measures to manage drilling mud, will be provided in the Offshore Construction Method Statement, which is secured in Schedule 14 Condition 18 of the draft Development Consent Order (DCO) (C1 F08).
1.5.2 Offshore In-Principle Monitoring Plan REP5-026		
REP6-137.55	55.As raised in section 1.4 at paragraphs 48 and 51 above, we note there are inconsistencies within REP5-026 and across REP5-024, e.g. references made again to measure number 88 of the Mitigation and Monitoring Schedule [REP5- 024], which refers to the use of PPE rather than measure number 100 of REP5- 024 which refers to 'Monitoring of the cables and their burial status', as referenced elsewhere in Table 1.3 and Table 1.4 of REP5-026. This and other occurrences should be amended accordingly.	The Applicant notes and welcomes this comment. The Offshore In-Principle Monitoring Plan (J15 F03) has been updated to correct these errors and submitted at Deadline 7.

2.6 Natural Resources Wales – Marine Water and Sediment Quality

Table 2.6: REP6-137 Natural Resources Wales - Marine Water and Sediment Quality (MW&SQ)

Planning Inspectorate Ref. No.	Written Submission Comment	Applicant's response
REP6-137.56	56.Other than the points raised below, we have no further comments to make at this stage with respect to marine water and sediment quality.	The Applicant notes this response.
1.6.1 Outline Landfall Construction Method Statement REP5-044		
REP6-137.57	57.NRW(A) welcome the commitment to the development of and adherence to a bentonite breakout plan to be detailed in the Final Landfall Construction Method Statement. We welcome the opportunity to liaise with the Applicant on the development of the Spillage and Emergency Response Plan.	The Applicant notes this response.

2.7 Natural Resources Wales – WFD: Coastal and Transitional Water Bodies – Offshore Works

Table 2.7: REP6-137 Natural Resources Wales – WFD: Coastal and Transitional Water Bodies – Offshore Works

Planning Inspectorate Ref. No.	Written Submission Comment	Applicant's response
REP6-137.58	58.We have no further comments to make at this stage on with respect to offshore WFD.	The Applicant notes and welcomes this response.

2.8 Natural Resources Wales – Designated Landscapes

Table 2.8: REP6-137 Natural Resources Wales - Designated Landscapes

Planning Inspectorate Ref. No.	Written Submission Comment	Applicant's response
2.1.1 Comments on the Response to NRW D4 Submission REP5-061		
REP6-137.59	59.Our comments below address the Applicant's Response in Table 2.9.	
2.1.2 Comments on the Applicant's Response to REP4-105.68 & REP4-105.69		
REP6-137.60	60.The Applicant refers to a different study to that referred to by NRW (A) in our response under REP4-105.68 & REP4-105.69. To clarify, the two studies are: • Seascape and Visual Sensitivity To Offshore Wind Farms In Wales: Strategic Assessment and Guidance Stage 1- Ready Reckoner Of Visual Effects Related To Turbine Size Simon White, Simon Michaels And Helen King, White Consultants Report No 315, March 2019 (2019 Study) • Offshore Energy Strategic Environmental Assessment Review and Update of Seascape and Visual Buffer study for Offshore Wind farms Final Report for Hartley Anderson March 2020 (2020 Study)	NRW has based its assessment of magnitude of impact primarily on the use of wirelines. The wirelines the Applicant has generated, as a stage in the production of the photomontages, and the thresholds set in the various White reports, which are based on wirelines, The Applicant explained in paragraph 1.4.1.2 *et seq.* of Annex 8.4: Seascape, landscape and visual impact assessment methodology (APP-104) why the use of wirelines to determine buffers for different heights of turbines is incorrect and contrary to GLVIA3 guidance which advises against setting thresholds (GLVIA3, paragraph 3.32). The Applicant has further responded to NRW (A)'s submissions on the three NRW reports (collectively known as White Consultant (2019), as they are read together) and the documents' use of wirelines to judge distance buffers, regardless of sensitivity of the seascape in which a development is located, in previous responses (e.g. REP5-061, paragraph REP4-105.68.) The Applicant has responded to the OESEA4 buffer distances in its REP3-062, response to ExA Q1.20.3. With reference to using White 2019 documents in Welsh waters, rather than White 2020. The Applicant questioned why one report was applicable to Welsh territorial waters in the East Irish Sea and a different one to adjoining English and Isle of man territorial waters in the same sea (paragraph REP3-090.201 of REP4-047). NRW responded that there were more existing offshore wind farms in Welsh territorial waters and so there was a larger evidence base. This is not correct, as there are as many, if not more, offshore turbines off the northwest coast of England. NRW has now stated that it is also a slightly different evidence base, due to other matters, without
REP6-137.61	61.Whilst both studies provide guidance on the potential impacts of offshore wind turbine developments – and reach 'broadly consistent findings'[2] - it is the 2019 Study that forms part of NRW's evidence base and which is relevant to Welsh waters specifically. The 2020 Study was prepared to inform the Department for Business, Energy and Industrial Strategy's OESEA4 Environmental Report, March 2022. The OESEA4 Report confirms the 2019 Study remains relevant and that its findings are applicable to Welsh Waters:	
REP6-137.62	62.'White Consultants (2020a) considered the thresholds of average low magnitude of effect detailed above to indicators for minimum thresholds as it is considered that effects could still be significant at around these distances for high sensitivity receptors. It is noted that the difference in these thresholds of effect compared to the similar exercise undertaken for Wales (NRW 2019) are due to fewer wind farms being considered and a	

Planning Inspectorate Ref. No.	Written Submission Comment	Applicant's response
	slightly different basis for the assessment. For the purposes of OESEA4, it is considered that those values in NRW (2019) are relevant to Welsh waters and that those presented in White Consultants (2020a) are relevant to English waters. While the analysis in White Consultants (2020a) included wind farms in Scottish waters, this area is not covered by the draft plan/programme'. [3] (our emphasis)	explaining how it is different, if not in the number of offshore wind farms studied. The inclusion of wind turbines in Scottish territorial waters in White 2020 would only have increased distance thresholds, as it is agreed that visibility is better in Scotland. For this reason the Applicant didn't not use the data for Scottish water/visibility.
REP6-137.63	63.The Applicant incorrectly states the 2020 Study 'supersedes' the 2019 Study. It does not. The 2020 Study was undertaken for a different purpose. As confirmed in the 2020 Study[4] , it supersedes a similar study undertaken by White Consultants in 2016 for the previous (OESEA3) Environmental Report. The 2020 Study confirms the relevance of NRW's 2019 Study: 'The NRW (2019) reports which have larger buffer distances are considered to remain a valid expression of the analysis carried out on a slightly different basis and with slightly fewer wind farms considered. These should continue to form a basis for consideration within Welsh waters but the updated findings of this SEA can also inform these discussions'[5] .	Despite the Applicant not agreeing with the use of wirelines and thresholds, as set out previously and summarised above,the Applicant notes in REP4-032 (77) that the Mona Array Area is within the lowest category of sensitivity within the Welsh territorial waters, that of a low/medium. The Applicant's final position on these matters is set out in the Applicant's Closing Submissions (S_D7_2).
REP6-137.64	64.As above, the conclusions reached in the two studies are broadly consistent, and the 2019 Study is relevant to the consideration of the likely impacts of offshore wind turbine developments within Welsh Waters (i.e. the Mona Array). Our previous comments which address the 2019 Study remain relevant and valid.	
2.1.3 Comments on the Applicant's Response to REP4-105.77		
REP6-137.65	65.We disagree with the Applicant's statement that at certain viewpoints it was necessary to split the cumulative wirelines. For example, at Viewpoint 24: Bull Bay, Amlwch [PDF Page 12 in REP3-046], it would have been possible to capture both the Mona and Awel-y-Mor Arrays within one 90 degree field of view, without splitting the Arrays across two separate images. The split at Viewpoint 24 is particularly problematic because it occurs within the Mona Array, which disrupts the legibility of the Array. Whilst the Applicant states they needed to split the images in order to capture the coast at either edge of the view, we advise the relationship between the coast and offshore waters is already depicted in the 180°	The Applicant has responded to this point in REP5-069, paragraph REP4-105.79. The cumulative wirelines provide a 180° view at the correct size. The wirelines provide the same coverage (180°) as the baseline photography and the Mona alone photomontages. The 180° wirelines provide additional context and evidence of what the visual receptor would experience at each viewpoint, including the coast-to-coast view where possible.

Planning Inspectorate Ref. No.	Written Submission Comment	Applicant's response
	panoramic photographs [e.g. PDF Page 6 in APP108]. The priority for the cumulative wireframes should have been the impact of the two schemes in combination, avoiding any unnecessary splits between the Arrays (Mona and Awel y Mor) being assessed.	

[2] Offshore Energy Strategic Environmental Assessment Review and Update of Seascape and Visual Buffer study for Offshore Wind farms Final Report for Hartley Anderson March 2020 Paragraph 13.66. [3] UK Offshore Energy Strategic Environmental Assessment Future Leasing/Licensing for Offshore Renewable Energy, Offshore Oil & Gas and Gas Storage and Associated Infrastructure OESEA4 Environmental Report Prepared by Department for Business, Energy and Industrial Strategy, March 2022, Pages 368-9. [4] Offshore Energy Strategic Environmental Assessment Review and Update of Seascape and Visual Buffer study for Offshore Wind farms Final Report for Hartley Anderson March 2020, Introduction. [5] Offshore Energy Strategic Environmental Assessment Review and Update of Seascape and Visual Buffer study for Offshore Wind farms Final Report for Hartley Anderson March 2020, Paragraph 7.82.

2.9 Natural Resources Wales – WFD Compliance Assessment: Onshore Works

Table 2.9: REP6-137 Natural Resources Wales – WFD Compliance Assessment: Onshore Works

Planning Inspectorate Ref. No.	Written Submission Comment	Applicant's response
REP6-137.66	66.No further comments to make at this time and our previous comments remain valid (REP5-098 section 2.2).	The Applicant welcomes this comment. This is reflected in section 1.4.4 of the Mona and NRW (A) Onshore Statement of Common Ground (S_D1_13 F03), where all matters on WFD compliance are agreed.

2.10 Natural Resources Wales – Air Quality

Table 2.10: REP6-137 Natural Resources Wales – Air Quality

Planning Inspectorate Ref. No.	Written Submission Comment	Applicant's response
REP6-137.67	67.No further comments to make at this time and our previous comments remain valid (REP3-090 section 2.3).	The Applicant welcomes this comment. This is reflected in section 1.4.6 of the Mona and NRW (A) Onshore Statement of Common Ground (S_D1_13 F03), where all matters on air quality are agreed.

2.11 Natural Resources Wales – Ecology (Terrestrial)

Table 2.11: REP6-137 Natural Resources Wales - Ecology (Terrestrial)

Planning Inspectorate Ref. No.	Written Submission Comment	Applicant's response
2.4.1 Comments on the Applicant's Response to NRW Deadline 3 Submissions REP5-059		
REP6-137.68	68.NRW (A) note the response in relation to our comments and principally we welcome the updates in regard to the updated Outline Landscape and Ecology Management Plan (REP5-035). However, below we have provided some further comments.	The Applicant welcomes the general feedback regarding to the updates to the Outline LEMP at Deadline 5 (REP5-035) and has provided responses to NRW's further comments below.
REP6-137.69	69.We note the comments for REP3-090.224, however, it appears there is an error with the cross referencing in the document. Clarification is sought.	The Applicant's response to REP3-090-224 means to signpost the reader to further comments provided below (in that response document) rather than to a specific cross-reference and apologises for the error that appears in the document.
REP6-137.70	70.We note the submission by the Applicant in regard to REP3-090.281. However, we consider that St Asaph Business Park and its environs supports a nationally important population of great crested newt with current conservation status being unfavourable. Our suggested targets were based on favourable as opposed to unfavourable levels. The Applicant is reminded of the requirement to restore populations to their favourable as opposed to current conservation status. We would have no objection to targets being agreed at a later date.	The Applicant is happy to continue to engage with NRW on this matter to agree an appropriate target (or targets) for a GCN population size Key Performance Indicator within the final LEMP. Paragraph 1.11.6.2 of the Outline LEMP (J22 F05) has been amended to clarify this approach, with additional wording added to clarify that the long-term monitoring will also include habitats for GCN suitability (with a commitment to agreeing appropriate habitat key performance indicators with NRW). Paragraph 1.6.5.4 of Outline LEMP Appendix D (GCN mitigation strategy) (J22 F05) has also been amended to reflect this advice.
REP6-137.71	71.The content of the Applicant's submission is noted at REP3-090.282. The existing long-term great crested newt (GCN) compensations are subject to pond management works under conservation licences. The NRW legacy body Countryside Council for Wales (CCW) historically received guidance from the European Commission (EC) that conservation licences are required when the habitat of listed species is subject to natural change, e.g. succession or natural; event e.g. a flood. In our view, pond management is likely to cause damage to GCN pond breeding sites or	This point is noted and paragraph 1.6.5.5 of Outline LEMP Appendix D (GCN mitigation strategy) (J22 F05) has been amended to reflect this recommendation from NRW.

Planning Inspectorate Ref. No.	Written Submission Comment	Applicant's response
	resting places or cause disturbance, death or injury to amphibians at any time of year. We therefore advise that conservation licences are required for the management of habitats post construction of the proposal.	
REP6-137.72	72.We note the Applicant's comments to REP3-090.291, our comments are as follows: 1. The long term monitoring component will be limited to the ecology area around the substation and the sustainable drainage system (SuDS) pool. 2. We do not consider 2-3 torch counts and a Habitat Suitability Index Survey to cause unnecessary disturbance. This approach is entirely in line with all other large scale mitigation schemes in north Wales and annual surveillance associated with designated sites. Existing surveillance data for St Asaph Business Park and its environs indicates the overall site satisfies the selection criteria for notification as a Site of Special Scientific Interest (SSSI). 3. The Applicant appears to be unclear of licensing approaches in Wales. Licences now include two end dates. The first end date is the date for completion of licensable activities. The second date is the requirement for long term post development monitoring. 4. The Applicant also appears to be unclear as to the material component provisions of the definition of conservation status. Conservation status assessment require consideration over multiple generations. The life span of GCN is considered to be up to 12-15 years. 5. We advise that annual monitoring is carried annually for the life span of the project. 6. Given a range of factors including unfavourable current conservation status, the national significance of the St Asaph GCN population and the existing requirement for long term annual monitoring associated with the Gwynt y Mor Mitigation Area, we wish to reiterate the annual surveillance requirement, which we surmise will be carried out by the future occupier of the ecology area,	The advice from NRW is noted. Paragraphs 1.6.5.4 – 1.6.5.6 of Outline LEMP Appendix D (GCN mitigation strategy) (J22 F05) have been updated to reflect the recommended approach with regards to the scope of GCN monitoring (HSI surveys and 2 – 3 torch counts per pond) and duration (annually for the EPSM Licence 'second date' period).

Planning Inspectorate Ref. No.	Written Submission Comment	Applicant's response
	7. We note a proposal to undertake surveillance every five years. In our view, this is unsatisfactory for the purposes of demonstrating no detriment to the maintenance of the favourable conservation status of the population of GCN at this site. This requirement is entirely consistent with all other major sites for GCN in North Wales.	
REP6-137.73	73.We note the Applicant's comments for REP3-090.302, in respect of post development monitoring see above.	Noted
2.4.2 Comments on the Outline Landscape and Ecology Management Plan REP5-035		
REP6-137.74	74.We welcome the updated Outline Landscape and Ecology Management Plan and are generally satisfied with the amendments. However, we do have some further comments, and these are as follows. We have some comments as follows:	The Applicant welcomes the general feedback regarding to the updates to the Outline LEMP at Deadline 5 (REP5-035) and has provided responses to NRW's further comments.
REP6-137.75	75.The Applicant's amendment for Section 1.6.1.15 is noted. We advise that tenure transfer completion date is included in the licence method statement.	The Applicant confirms that the tenure transfer completion date will be included in the licence method statement.
REP6-137.76	76.We advise inclusion of an additional section (1.6.1.16) in order to identify an ecological compliance auditor. We advise the appointment of an ecological compliance auditor should be from an externally appointed body.	The role of ecological compliance auditor has been added to Section 1.6 of the Outline LEMP in paragraph 1.6.1.16 (J22 F05).
REP6-137.77	77.We note section 1.9.6.4, however, we disagree with this statement, in our opinion, the conservation management of ponds is a licensable activity at any time of year. The reasons for this include potential disturbance killing or injury to amphibians and implementation of conservation management works is likely to result the loss of vegetation used for egg laying and, in our opinion, it is not possible to manage ponds lawfully without a licence.	The Applicant notes this advice and the GCN mitigation strategy in the Outline LEMP has been amended accordingly to reflect this recommendation (J22 F05).
REP6-137.78	78.We note the amendments to Table 1.1, our comments are as follows: • With regards to Bats, Water Vole and Otter we note and accept the proposals. • In reference to Hazel dormouse, we note the proposals, however, advise the timing should be May to October. • In reference to GCN, we note the survey proposals. In respect of timing, we advise that: 1) eDNA surveys are undertaken between mid-April and	With regards to Table 1.1 in the Outline LEMP (J22 F05), the Applicant has made the following amendments: • Hazel dormouse: the survey period has been amended from May to November, to May to October • GCN: the survey timings for this species in Table 1.1 of the Outline LEMP (J22 F05) are consistent with standard survey guidelines for this species

Planning Inspectorate Ref. No.	Written Submission Comment	Applicant's response
	the beginning of June. 2) Population size class assessments are undertaken between April and mid-May.	and have therefore not been amended. However, clarification has been added for at least two of the population size class assessment surveys to be undertaken within the peak breeding season of mid-April to mid-May.
REP6-137.79	79.We note the revisions to Section 1.11.6. We do not concur with the submitted proposals, see above for further detail. In summary, the proposals are unsuitable for the purposes of demonstrating no detriment to the maintenance of the favourable conservation status of the applicable local population of the species.	The Applicant notes this advice. Appendix D (GCN mitigation strategy) of the Outline LEMP (J22 F05) has been amended accordingly to reflect the recommendations provided by NRW in its responses above. Paragraph 1.11.6.2 of the Outline LEMP (J22 F05) has also been amended.
REP6-137.80	80.Within Appendix D section 1.6, there is no reference made to the ecological compliance audit. In our view external ecological compliance audit will be required.	The Outline LEMP (J22 F05) has been amended to include provision for an external ecological compliance audit procedure (added as paragraph 1.6.1.16).
REP6-137.81	81.We note Appendix D sections 1.6.5.4-1.6.5.7, in our view, proposed monitoring does not accord with extant long term schemes or with our requirement. As identified above the proposals are not satisfactory for the purposes of informing actions required to maintain or restore the local GCN population to its favourable, as opposed to current conservation status. We would expect the body identified in paragraph 1.6.5.7 to be responsible for long term monitoring as well as management.	Paragraphs 1.6.5.4 – 1.6.5.6 of Outline LEMP Appendix D (GCN mitigation strategy) (J22 F05) have been updated to reflect the recommended approach from NRW with regards to the scope of GCN monitoring (HSI surveys and 2 – 3 torch counts per pond) and duration (annually for the EPSM Licence 'second date' period). Paragraph 1.6.5.7 of Outline LEMP Appendix D (GCN mitigation strategy) (J22 F05) has been amended to include monitoring as well as management as a responsibility of the suitable third party responsible body for the post-construction period.

2.12 Natural Resources Wales – Water Quality (Surface and Groundwater)

Table 2.12: REP6-37 Natural Resources Wales – Water Quality (Surface and Groundwater)

Planning Inspectorate Ref. No.	Written Submission Comment	Applicant's response
REP6-137.82	82.No further comments to make at this time and our previous comments remain valid (REP3-090 section 2.5).	The Applicant welcomes this comment. This is reflected in section 1.4.3 of the Mona and NRW (A) Onshore Statement of Common Ground (S_D1_13 F03), where all matters on hydrology and flood risk are agreed.

2.13 Natural Resources Wales – Flood Risk

Table 2.13: REP6-37 Natural Resources Wales – Flood Risk

Planning Inspectorate Ref. No.	Written Submission Comment	Applicant's response
REP6-137.83	83.No further comments to make at this time and our previous comments remain valid (REP3-090 section 2.6)	The Applicant welcomes this comment. This is reflected in section 1.4.3 of the Mona and NRW (A) Onshore Statement of Common Ground (S_D1_13 F03), where all matters on hydrology and flood risk are agreed.

2.14 Natural Resources Wales – Materials and Waste

Table 2.14: REP6-37 Natural Resources Wales – Materials and Waste

Planning Inspectorate Ref. No.	Written Submission Comment	Applicant's response
REP6-137.84	84.No further comments to make at this time and our previous comments remain valid (REP3-090 section 2.7).	The Applicant welcomes this comment. This is reflected in section 1.4.7 of the Mona and NRW (A) Onshore Statement of Common Ground (S_D1_13 F03), where all matters on materials and waste are agreed.

2.15 Natural Resources Wales – Marine Licensing

Table 2.15: REP6-37 Natural Resources Wales - Marine Licensing

Planning Inspectorate Ref. No.	Written Submission Comment	Applicant's response
REP6-137.85	85.Within REP5-098 NRWs Marine Licensing Team (MLT) set out outstanding matters in relation to the drafting of the DCO and deemed Marine Licence. NRW MLT have reviewed the Applicants Deadline 5 submission which included an updated draft DCO (REP5-006). NRW consider that outstanding matters as summarised within REP5-098 remain.	NRW (A)'s comment is noted. See Schedule of outstanding DCO drafting points (S_D7_4).
REP6-137.86	86.NRW MLT recognise that amendments have been made to the drafting of the schedule 14 of the DCO in response to the Applicant removing the provision for high order UXO clearance from the deemed Marine Licence. We however note the following; • **Schedule 14, Condition 20 – Underwater Sound Management Strategy** The condition has been amended in a manner that no longer requires the UWSMS to be submitted and approved prior to clearance of unexploded ordnance. However, the UWSMS [REP5-028] provided by the Applicant at Deadline 5 contains detail relating to both piling and UXO clearance which is proposed to be finalised post consent. Therefore, it would appear that the Strategy should require approval prior to UXO clearance taking place. The condition should therefore be amended accordingly. • **Schedule 14, condition 2(e) and condition 13 (8),(9)** We would advise a minor amendment take place to the drafting of the above provision. Rather than reference to "clearance of low order unexploded ordinance" we consider drafting should be in line with the definition provided, that is "low order unexploded ordinance clearance".	Please see row REP6-137.18 above for the Applicant's response in relation to Schedule 14, Condition 20 – Underwater Sound Management Strategy. The Draft DCO (C1 F08) has been updated to address the comments made in respect of reference to the phrase "low order unexploded ordinance clearance".