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MONA OFFSHORE WIND PROJECT

Applicant's Responses to Further Consultation

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Image of an offshore wind farm

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Prepared for:

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Acronyms

Acronym	Description
AEoI	Adverse Effects on Integrity
CBRA	Cable Burial Risk Assessment
CoCP	Code of Construction Practice
CSIP	Cable Specification and Installation Plan
cSPA	candidate Special Protection Area
cUXO	Confirmed Unexploded Ordnance
DAERA	Department of Agriculture, Environment and Rural Affairs
DCO	Development Consent Order
DESNZ	Department for Energy Security and Net Zero
dML	deemed Marine Licence
EIA	Environmental Impact Assessment
EPS	European Protected Species
HRA	Habitats Regulations Assessment
IEF	Important Ecological Feature
ISAA	Information to Support an Appropriate Assessment
JNCC	Joint Nature Conservation Committee
LCMS	Landfall Construction Method Statement
LSE	Likely Significant Effect
MCA	Maritime and Coastguard Agency
MDS	Maximum Design Scenario
MMMP	Marine Mammal Mitigation Protocol
MNEF	Marine Navigation Engagement Forum
MOD	Ministry of Defence
MPCP	Marine Pollution Contingency Plan
NAS	Noise Abatement Systems
NRW	Natural Resources Wales
NRW (A)	Natural Resources Wales (Advisory)
NRW MLT	Natural Resources Wales Marine Licensing Team
NPS	National Policy Statement
NWIFCA	North Western Inshore Fisheries and Conservation Authority
oCMS	Offshore Construction Method Statement
oLCMS	outline Landfall Construction Method Statement
OSPAR	The Convention for the Protection of the Marine Environment of the North-East Atlantic

Acronym	Description
PAD	Protocol for Archaeological Discoveries
PEIR	Preliminary Environmental Information Report
PEMP	Project Environmental and Management Plan
pSPA	Proposed Special Protection Area
PSR	Primary Surveillance Radar
pUXO	Potential Unexploded Ordnance
RCAHMW	Royal Commission on the Ancient and Historical Monuments of Wales
ROV	Remotely Operated Vehicle
SNCB	Statutory Nature Conservation Body
SoCG	Statement of Common Ground
SPA	Special Protection Area
TCE	The Crown Estate
TraC	Transitional and Coastal
UWSMS	Underwater Sound Management Strategy
UXO	Unexploded Ordnance
WFD	Water Framework Directive
WSI	Written Scheme of Investigation
ZoI	Zone of Influence

Units

Unit	Description
g	Gram
kg	Kilogram
km	Kilometre
m	Metre
nm	Nautical mile

1 The Applicant's Responses to Further Consultation

1.1 Introduction

1.1.1.1 On 21 May 2024, the application by Mona Offshore Wind Limited (the Applicant) for a standalone Natural Resources Wales (NRW) Marine Licence was submitted to the NRW Marine Licensing Team (NRW MLT). Following the initial submission of documents, various consultees submitted their comments on the application. Responses to these comments were provided by the Applicant on 22 November 2024 in the Responses to NRW MLT (S_NRWML_2), Responses to NRW (Advisory) (NRW (A)) (S_NRWML_3) and Responses to Other Consultees (S_NRWML_4).

1.1.1.2 Further consultation was then published on the NRW MLT public register on 05 March 2025. This document records the Applicant's Responses to comments arising from this Further Consultation.

1.2 Applicant's Response to Natural Resources Wales (Advisory)

Table 1.1: Natural Resources Wales (Advisory).

Paragraph Reference	Written Submission Comment	Applicant's response
1	**1 MARINE ORNITHOLOGY** **1.1 Main Matters** 1. Key marine ornithological impacts from the Mona transmission assets proposal will be from disturbance/displacement from vessel activity, and Unexploded Ordnance (UXO) clearance on the overwintering red-throated diver (RTD), common scoter and waterbird assemblage (as RTD and common scoter are components of the assemblage) qualifying features of the Liverpool Bay/Bae Lerpwl Special Protection Area (SPA). 1. We advise that adherence to an offshore Environmental Management Plan (EMP) that will include measures to minimise disturbance to rafting birds from transiting vessels, a timing restriction of no offshore export cable installation or UXO clearance during the period 1st November – 31st March within Liverpool Bay SPA, and inclusion of a Marine Pollution Contingency Plan (MPCP) is required in order to avoid or reduce disturbance and displacement to the wintering RTD, common scoter and waterbird assemblage features of Liverpool Bay SPA. 2. The EMP and the specific measures to be contained within it will need to be secured and conditioned in the Marine Licence.	The drafting of the standalone NRW Marine Licence is entirely a matter for NRW MLT. However, the Applicant anticipates that a Project Environmental and Management Plan (PEMP) will be secured in the standalone NRW Marine Licence as identified in the Marine Licence Principles document (J9 F06), which is to include the Measures to Minimise Disturbance to Marine Mammals and Rafting Birds (J17 F03). As set out in that document it is anticipated that a restriction on cable installation and Unexploded Ordnance (UXO) clearance from 1 November to 31 March within the Liverpool Bay/Bae Lerpwl Special Protection Area (SPA) will therefore be secured as indicated in the Mitigation and Monitoring Schedule (J10 F07) and the Marine Licence Principles document (J9 F06). It is also expected that the Marine Pollution Contingency Plan (MPCP) will be secured within the standalone NRW Marine Licence, as set out in the Marine Licence Principles document (J9 F06).
2	**1.2 General Comments** 2. In our view, the potential impacts from the proposed works covered by this ML for the transmission assets for the Mona Offshore Wind Project are limited to disturbance/displacement of the RTD, common scoter and waterbird assemblage non-breeding qualifying features of the Liverpool Bay/Bae Lerpwl SPA resulting from vessel activity and pre-commencement activities, such as UXO clearance, within the SPA.	The Applicant notes NRW (A)'s comment. The Applicant confirms that the impacts of disturbance and displacement from the presence of vessels and pre-commencement activities such as UXO clearance have been assessed for red-throated diver, common scoter and the non-breeding waterbird assemblage features in the Mona Offshore Cable Corridor and Access Areas, which overlap with the Liverpool Bay/Bae Lerpwl SPA. The results of the assessments and conclusions are presented in section 5.7.2 of Volume 2, Chapter 5: Offshore ornithology (F2.5 F04) and within the Information to Support an Appropriate Assessment (ISAA) Part Three: SPAs and Ramsar sites Assessments (E1.3 F03). The assessment concluded a minor adverse effect (not significant in Environmental Impact Assessment (EIA) terms) during construction and a negligible effect during

Paragraph Reference	Written Submission Comment	Applicant's response
		operation (not significant in EIA terms) for red-throated diver, common scoter and the non-breeding waterbird assemblage features. As per Row 1 above, it is anticipated that a restriction on cable installation and UXO clearance from 1 November to 31 March within the Liverpool Bay/Bae Lerpwl SPA will be secured within the standalone NRW Marine Licence as indicated in the Mitigation and Monitoring Schedule (J10 F07) and the Marine Licence Principles document (J9 F06). NRW (A) have confirmed in Row 6 below that they consider it unlikely that there will be an adverse effect on the integrity (AEoI) of the Liverpool Bay SPA/Bae Lerpwl SPA.
3	3. The majority of the points regarding marine ornithology raised by NRW (A) in our initial consultation response (dated 29 August 2024) have been resolved during the course of the DCO process for the wider Mona project. Advice previously submitted that has not been changed is repeated for clarity with a note stating 'advice unchanged'.	The Applicant notes NRW (A)'s comment.
4	**1.3 Detailed Comments** **1.3.1 Conservation of Habitats and Species Regulations 2017 (Reg 63):** **1.3.1.1 Liverpool Bay/Bae Lerpwl SPA - Significant effects / Adverse effects** 4. The proposed Mona array is located 10km from the Liverpool Bay SPA, but the offshore export cable route goes through the SPA. RTD and common scoter are qualifying features of Liverpool Bay SPA and components of the wintering waterbird assemblage qualifying feature of the SPA. Additionally, common scoter are included as a priority species in the section 7 list made pursuant to the Environment (Wales) Act 2016. Both RTD and common scoter are sensitive to anthropogenic disturbance and displacement, including from vessel movements (Fliessbach et al. 2019; Kaiser et al. 2002).	The Applicant notes NRW (A)'s comment and welcomes NRW (A)'s conclusion that it is unlikely that there will be an AEoI on the Liverpool Bay SPA/Bae Lerpwl SPA from the Mona Offshore Wind Project alone and in-combination with other plans and projects. The drafting of the standalone NRW Marine Licence is a matter for NRW MLT. However, the Applicant anticipates that a PEMP will be secured in the standalone NRW Marine Licence as identified in the Marine Licence Principles document (J9 F06), which is to include the Measures to Minimise Disturbance to Marine Mammals and Rafting Birds (J17 F03). As set out in that document it is anticipated that a restriction on cable installation and UXO clearance from 1 November to 31 March within the Liverpool Bay/Bae Lerpwl SPA will therefore be secured as indicated in the Mitigation and Monitoring Schedule (J10 F07) and the Marine Licence Principles document (J9 F06).
5	5. As the offshore export cable route goes through the Liverpool Bay SPA, cable installation vessels will be moving through the SPA during this phase. There is also the potential for UXO clearance activities to occur along the export cable route located within the SPA. As the port location is currently unknown, there is the possibility that UXO clearance vessels and cable installation vessels travelling to reach the export cable corridor area and/or array area located outside of the SPA, and vessels transiting from port to the array area, could travel through the SPA to reach these areas. Therefore, given the sensitivity of the RTD	

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	and common scoter features of the SPA to disturbance and displacement including from vessel movements and UXO clearance, we agree with the Applicant's conclusion in *E1.4: HRA Stage 1 Screening report F03* that a likely significant effect (LSE) cannot be ruled out and that this site has been taken forward to E1.3: HRA Stage 2 ISAA Part 3 – SPAs and Ramsars report F03.	
6	6. However, subject to an appropriate offshore EMP that includes all the measures listed by the Applicant in *the E1.3: Stage 2 ISAA Part 3 – SPAs and Ramsars report F03* being agreed, in writing with NRW (A), and appropriately secured as a condition of the Transmission Asset ML (and deemed Marine Licence [dML] within the DCO consent), then we consider it unlikely that there will be an adverse effect on Liverpool Bay SPA. Further details regarding the mitigation measures and securing of these are set out below.	
7	**1.3.1.2 Liverpool Bay/Bae Lerpwl SPA - Applicability of mitigation measures** 7. Since the initial consultation response (dated 29 August 2024), the Applicant has committed to further mitigation measures that are of relevance for RTD and common scoter at Liverpool Bay SPA. The additional mitigation of relevance includes: the removal of high-order UXO clearance from the draft DCO, and a commitment to a seasonal restriction on low order UXO clearance activities within the Liverpool Bay/Bae Lerpwl SPA between 1 November and 31 March (as set out in Table 1.1 of *J9: Marine Licence Principles document F06* and Table 1.1 of *J17: Measures to Minimise Disturbance to Marine Mammals and Rafting Birds F03)*. These additional measures were committed to in response to concerns raised by both NRW (A) and JNCC during the DCO examination process that the seasonal restriction did not apply to pre-commencement activities including UXO clearance. Please see paragraph 1 of our Deadline 4 response [REP4-105], paragraph 20 of our response on the Report to Inform European Sites (RIES) in REP5-099 and paragraphs 43-44 of our Deadline 5 response [REP5-098] for more information on the concerns raised.	The Applicant notes NRW (A)'s comment.
8	8. Therefore, we welcome the measures listed within *E1.3: Stage 2 ISAA Part 3 – SPAs and Ramsars report F03* of adherence to an offshore Environmental Management Plan (EMP) that will include: 3. Measures to minimise disturbance to rafting birds from transiting vessels (as set out in report J17: Measures to Minimise Disturbance to Marine Mammals and Rafting Birds F03).	

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	4. A timing restriction of no offshore export cable installation or low order UXO clearance during the period 1st November – 31st March within Liverpool Bay SPA. 5. A Marine Pollution Contingency Plan (MPCP).	
9	9. We agree that this EMP, and the specific aspects within it that the Applicant commits to listed above, is needed and is necessary to avoid or reduce disturbance, and therefore displacement and pollution impacts to the RTD, common scoter and wintering waterbird assemblage qualifying features of the SPA from pre-commencement activities such as UXO clearance, cable laying activities in the construction phase, and from vessels potentially transiting from port through the SPA during all phases.	The Applicant notes NRW (A)'s comment and welcomes NRW (A)'s agreement on the measures proposed.
10	10. As was noted to the Applicant during the offshore ornithology expert working group (EWG) for the Mona project, NRW (A) and the other SNCBs consider that there is not much that can be done to minimise disturbance to RTD and common scoter due to cable installation works, and the measures to minimise disturbance (such as those committed to by the Applicant in report *J17, F03*) were more related to activities such as Crew Transfer Vessel movements, rather than cable installation works. The only effective measure to minimise disturbance from cable installation works is to not be present in the area. Therefore, we note that the Applicant's commitment to measures to minimise disturbance to rafting birds from transiting vessels is only applicable to minimising disturbance to these features of the SPA from vessel transit movements through the SPA during all phases.	The Applicant notes NRW (A)'s comment.
11	11. Given that vessels clearing UXOs and laying the offshore export cable within the SPA will need to follow the specific route for the offshore export cable, it will not be possible for them to adhere to the measures set out by the Applicant in report *J17 F03*, such as using existing shipping lanes/transit routes, avoiding aggregations of rafting birds etc. Therefore, the Applicant's commitment to the timing restriction on UXO clearance and to offshore export cable installation activities to avoid the key winter period when the features of concern will be present in greatest numbers, is welcomed in order to minimise disturbance to the relevant SPA features from these activities within the SPA.	The Applicant welcomes NRW (A)'s agreement on the timing restriction of cable installation activities and UXO clearance in the Liverpool Bay/Bae Lerpwl SPA during the 1 November to 31 March period to avoid the key overwintering period of red-throated diver and common scoter.
12	12. We note the Applicant's intention to secure an offshore EMP in the dML and Transmission Asset ML (as set out in the row relating to Project Environmental Monitoring Plan (PEMP), in the '*Marine Licence Principles document 06*' (report J9, submitted as part of the Transmission Asset ML application and into the DCO	The drafting of the standalone NRW Marine Licence is a matter for NRW MLT. However, the Applicant anticipates that a PEMP will be secured in the standalone NRW Marine Licence as identified in the Marine Licence Principles document (J9 F06), which is to include the Measures to

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	examination as REP7-075). We welcome the intention to secure this commitment in the Transmission Asset ML and agree that this should be secured therein. We also consider that the commitment to the timing restriction (on UXO clearance and offshore export cable installation within the SPA) needs to also be secured as a condition in the Transmission Asset ML.	Minimise Disturbance to Marine Mammals and Rafting Birds (J17 F03). As set out in that document it is anticipated that a restriction on working from 1 November to 31 March within the Liverpool Bay/Bae Lerpwl SPA will therefore be secured as indicated in the Mitigation and Monitoring Schedule (J10 F07) and the Marine Licence Principles document (J9 F06).
13	13. Following the Applicant's commitment to the application of the seasonal restriction to works within the SPA for both export cable installation activities and UXO clearance, the other measures contained within *J17 F03* to further reduce disturbance to rafting birds, combined with the low and temporary impact of remaining pre-commencement activities, NRW (A) agrees that this is appropriate to mitigate disturbance and displacement on the RTD, common scoter and wintering waterbird assemblage qualifying features of Liverpool Bay SPA. Subject to an appropriate EMP that includes all the measures listed above being agreed, in writing by NRW (A), and appropriately secured as a condition of the deemed ML and standalone ML, we consider it to be unlikely that there will be an adverse effect on Liverpool Bay SPA.	The Applicant notes NRW (A)'s comment and welcomes NRW (A)'s agreement that AEoI of the Liverpool Bay/Bae Lerpwl SPA is unlikely.
	14. We note that the timing restriction on offshore export cable installation activities within the SPA will not apply for the trenchless works on the intertidal zone, which will be supported by up to eight vessel movements at the landfall over the winter period. In our Relevant Representations [RR-011] we noted that the need to undertake this aspect during winter was unclear from the submission documents. In the Applicant's response to Relevant Representations [PDA-008], the Applicant noted that: *'The commitment to no offshore export cable laying during the overwintering period (1st November – 31st March) within the Liverpool Bay SPA has reduced flexibility in the construction programme, and therefore the programme of works is more constrained. Prohibiting works at the trenchless techniques exit pits during the overwintering period would add further pressure to the installation window for offshore export cables.'* We acknowledge the Applicant's position on this and regarding this aspect of the work, we note: 6. Any disturbance impact to features of the SPA will be temporary for the time of the vessel presence. 7. Birds will be able to return once the vessel has gone. 8. There will be other habitat available within the SPA to the birds for the time they are disturbed from the landfall area.	The Applicant has committed to using trenchless techniques to install the cable at landfall. This is secured through the outline Landfall Construction Method Statement (oLCMS) which must be submitted to the local authority for approval prior to the commencement of construction as part of the approval of the Code of Construction Practice (CoCP) secured by Requirement 9 of the Development Consent Order (DCO). NRW is a named consultee on the approval of those documents through the DCO and will therefore be consulted on the contents of the Landfall Construction Method Statement (LCMS) through the discharge of that DCO Requirement. The Applicant has committed to this as set out in the Mitigation and Monitoring Schedule (J10 F07).

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	9. Up to 8 movements across the key winter period of November-March represents a small proportion over this timescale. 10. A commitment to trenchless works at the landfall has been made – the Applicant's commitment to installing export cables from landward of Mean Low Water Springs (MLWS) to onshore by trenchless techniques is secured through the Applicant's *Outline Landfall Construction Method Statement F05* (report J26.14, submitted as part of the Transmission Asset ML application and into the DCO examination as REP7-089) and the Outline Landfall Construction Method Statement (LCMS) forms part of the Code of Construction Practice (CoCP) and is therefore secured under Schedule 2, Requirement 9 of the Draft DCO (see C1 'Draft Development Consent Order'). We advise that this commitment is also secured and conditioned via the TA ML. 11. NRW (A) advise that we will need to be consulted, in writing, on the outline LCMS and CoCP where there are marine elements involved.	
15	15. Based on the above, NRW (A) does not expect this temporary activity, as part of the construction phase, will result in an Adverse Effect on Site Integrity (AEoSI) on the RTD, common scoter and waterbird assemblage features of the Liverpool Bay SPA.	The Applicant notes and welcomes NRW (A)'s comment.
16	**1.3.2 European Protected Species (EPS):** 16. Advice unchanged from 29 August 2024. N/A for marine ornithology	The Applicant notes NRW (A)'s comment.
17	**1.3.3 Environment (Wales) Act 2016:** 17. Advice unchanged from 29 August 2024. N/A for marine ornithology.	The Applicant notes NRW (A)'s comment.
18	**1.3.4 Environment (Wales) Act 2016:** 18. Advice unchanged from 29 August 2024. There is the potential for the works to impact common scoter, which are included as a priority species in the section 7 list made pursuant to the Environment (Wales) Act 2016. Please refer to comments in the section above regarding Liverpool Bay SPA and specific impacts and the applicability of mitigation measures proposed by the application.	The Applicant notes NRW (A)'s comment. Please see the Applicant's responses above.
19	**1.3.5 Marine and Coastal Access Act Part 5: Nature Conservation:** 19. Advice unchanged from 29 August 2024. N/A for marine ornithology.	The Applicant notes NRW (A)'s comment.
20	**1.3.6 Water Framework Directive:**	The Applicant notes NRW (A)'s comment.

Paragraph Reference	Written Submission Comment	Applicant's response
	20. Advice unchanged from 29 August 2024. N/A for marine ornithology.	
21	**1.4 Comments on the NRW MLTs draft Habitats Regulations Assessment (HRA)** **1.4.1 Liverpool Bay/Bae Lerpwl SPA** 21. Whilst we largely agree with the conclusions of the draft HRA for the features of the Liverpool Bay SPA, we do note that the draft HRA does not currently consider the impact of UXO clearance and other pre-commencement activities as a pathway to disturbance impacts of Liverpool Bay SPA features, particularly RTD, common scoter and the waterbird assemblage features. This was a key consideration and point of discussion during the DCO Examination (as set out above regarding applicability of mitigation measures). Therefore, we advise that the draft HRA is amended accordingly to include consideration of this impact pathway.	The Applicant notes NRW (A)'s comment and that this is in response to NRW MLT's draft Habitats Regulations Assessment (HRA). The Applicant highlights that UXO clearance and other pre-commencement activities have been assessed under the pathway titled 'Disturbance and displacement from airborne sound and presence of vessels and infrastructure during construction, operation and maintenance and decommissioning phases' (section 5.7.2 of Volume 2, Chapter 5: Offshore ornithology (F2.5 F03)) and within the Information to Support an Appropriate Assessment (ISAA) Part Three: SPAs and Ramsar sites Assessments (E1.3 F03).
22	22. We note that all the mitigation measures the Applicant has committed to that are relevant to minimising impacts to the RTD, common scoter and waterbird assemblage qualifying features of the Liverpool Bay SPA have been included in Section 4.2 of the draft HRA regarding the assessment taking into account additional mitigating measures, conditions or restrictions in relation to the relevant features of the SPA (pages 136-137 of draft HRA), namely: 12. An Offshore EMP that will include measures to minimise disturbance to rafting birds from transiting vessels, as set out in document J17: Measures to Minimise Disturbance to Marine Mammals and Rafting Birds F03. 13. The Offshore EMP will include a timing restriction of no offshore export cable installation or low order UXO clearance activities during the period 1 November to 31 March within the Liverpool Bay SPA. 14. The Offshore EMP will include an MPCP which will provide planning for accidental spills, address all potential contaminant releases and include key emergency details.	The Applicant notes NRW (A)'s comment.
23	23. We note that within the draft HRA for each of these mitigation measures the text states: *'The Offshore EMP can be secured within the marine licence.'* Given that we consider that these measures need to be appropriately secured and conditioned within the deemed ML and standalone ML in order for an AEoSI to be ruled out for the RTD, common scoter and waterbird assemblage features of the	The Applicant notes NRW (A)'s comment is relevant to NRW MLT's draft HRA.

Paragraph Reference	Written Submission Comment	Applicant's response
	Liverpool Bay SPA, we advise that the wording in the draft HRA is amended to state that: *'The Offshore EMP should be secured within the marine licence.'*	
24	**1.4.2 Other SPAs within NRW (A)'s remit** 24. We agree with the conclusions of the HRA for the other Welsh SPAs and features considered in the draft HRA, namely: 15. Aberdaron Coast and Bardsey Island/Glannau Aberdaron ac Ynys Enlli/ SPA: Manx shearwater 16. Skomer, Skokholm and the Seas off Pembrokeshire/Sgomer, Sgogwm a Moroedd Penfro SPA: Manx shearwater, European storm petrel, Atlantic puffin, lesser black-backed gull, seabird assemblage (including named components: black-legged kittiwake, common guillemot, razorbill) 17. Grassholm SPA: Northern gannet	The Applicant notes NRW (A)'s comment and welcomes NRW (A)'s agreement with the conclusions of the HRA for the other Welsh SPAs and features considered in the draft HRA.
25	**2 MARINE MAMMALS** **2.1 Main Matters** 25. The previously agreed amendment to clarify the approach to assessment for the impact to marine mammals from disturbance from vessel traffic has not been carried out by the Applicant. We advise that this amendment should be made.	NRW (A) initially considered that there was inadequate justification for an overall conclusion of low magnitude for 'Injury and disturbance to marine mammals from elevated underwater sound due to vessel use and other (non-piling) sound producing activities'. NRW (A) noted that the estimated numbers of animals disturbed by vessels and any subsequent conclusions are based on static impact radii. Given the known sensitivity of harbour porpoise, in particular to vessel noise, and the increase in the number of vessels in the area compared to baseline vessel traffic, NRW (A) advised that the assessment should revised and quantified both for the Mona Offshore Wind Project alone and in-combination with other projects. Studies presented in Volume 2, Chapter 4: Marine mammals (F2.4 F02) have been based on moving receptors in the field. Empirical data has been gathered from field studies on wild harbour porpoise to determine realistic impact ranges and a quantification of the number of animals potentially affected based on densities of key species has been provided. The assessment is based upon a worst-case scenario both for the Mona Offshore Wind Project alone and in-combination with other projects, with multiple levels of precaution already built into the assessment. The Applicant considers there is adequate justification provided for the assessment of the Mona Offshore Wind Project alone or in-combination with other projects and for the determination of low magnitude effects from underwater sound from vessel use.
26	**2.2 Detailed comments** **2.2.1 Injury and disturbance to marine mammals from elevated underwater sound due to vessel use and other (non-piling) sound producing activities (Key issue 4 from prior comments)** 26. In our previous response dated 29 August 2024, NRW (A) raised concerns that inadequate justification had been provided in the ES and Information to Support Appropriate Assessment (ISAA) for an overall conclusion of *low magnitude* for disturbance, noting that the estimated numbers of animals disturbed by vessels and any subsequent conclusions appear to have been based on static impact radii – i.e. equivalent to vessels that are not moving. NRW (A) continued discussions on this matter with the Applicant through the DCO process, and reached the following agreement; Per DCO deadline 6 submission REP6-071 "*Mona and Natural Resource Wales (Advisory) Offshore SoCG F02 S_D1_12 F02*" dated 20 December 2024, issue number NRW.MM.15 and DCO deadline 7 submission REP7-094 "*Mona and Natural Resource Wales (Advisory) Offshore SoCG (F03) S_D1_12*" dated 14	

Paragraph Reference	Written Submission Comment	Applicant's response
	January 2025 "*the Applicant agreed to include a clarification that the static radius approach used is a conservative assumption for a single point in time for a single vessel. Given this compromise, and the fact that the conclusions of the assessment are agreed, we can consider this matter closed.* "	In further consultation with NRW (A), NRW (A) reiterated their concerns regarding the methodology to underpin the vessel noise assessment. Therefore, the Applicant subsequently provided additional information as suggested by NRW (A) which included: 1) presenting numbers for the 4.08 km modelled radius to compare to the 7 km radius used in the assessment and 2) considering a dose response approach. Further to these the Applicant demonstrated that the radius of effect applied in the assessment based on empirical evidence resulted in a more conservative quantitative assessment compared to just simply applying the modelled ranges. The Applicant discussed this matter further with NRW (A) on 8 and 26 November 2024 and both parties agree that 'a single point in time' is an accurate and appropriate representation of the assessment methodology. This clarification was subsequently included in further consultation with NRW (A), but for clarity in the standalone NRW Marine Licence process, the Applicant reiterates here that the static radius approach used is a conservative assumption for a single point in time for a single vessel. The Applicant considers that the conclusions of the assessment are agreed with NRW (A) and there is no significant effect or AEoI from the Mona Offshore Wind Project alone. NRW (A) confirmed via further consultation that this matter is principally an academic discussion with no material impact on the conclusions of the assessment and agreed that this matter is closed. The Applicant was not aware that NRW (A) were seeking an update to Volume 2, Chapter 4: Marine mammals (F2.4 F02) and does not consider that this clarification merits an update to Volume 2, Chapter 4: Marine mammals (F2.4 F02) as it would not alter the outcome of the assessment.
27	27. However, the described changes to the marine mammals chapter of the ES have not been carried out, and are not present in *F2.4 Volume 2, Chapter 4: Marine mammals F02 22 January 2025* nor the *S_NRWML_5 Errata Sheet F01 13 November 2024* submitted for the ORML2429T Marine Licence application. In order to consider this matter resolved, the agreed amendments should be made. This should either be via an update to the chapter (preferentially) or as an update to the errata sheet.	
28	**2.2.2 Applicability of mitigation measures (Main Matter 1 from previous comments):** 28. NRW (A) advised that Noise Abatement Systems (NAS) should be given more serious consideration. We highlight the recent publication of the following marine noise policy papers and guidance issued by Department for Environment, Food and Rural Affairs (DEFRA) and the Joint Nature Conservation Committee (JNCC) on 21January 2025;	The final Underwater Sound Management Strategy (UWSMS) will consider a range of mitigation options including Noise Abatement Systems (NAS) technologies where necessary, and the consideration of NAS in the outline UWSMS (J16 F03) demonstrates the Applicant's commitment to using NAS if it is identified as the most appropriate option. The Applicant would like to highlight that all further options will be considered fully post-consent (as outlined in section 1.8 of the Outline UWSMS (J16 F03)), and if required, the most appropriate option(s) will be agreed in consultation with relevant licencing authority and Statutory Nature Conservation Bodies (SNCBs), in accordance with the latest policy (Defra, 2025) and guidance

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	Reducing Marine Noise Policy; The associated Joint Position Statement on the use of quieter piling methods and noise abatement systems when installing offshore wind turbine foundations. (JNCC, Natural England and Cefas 2025).	(including Joint Nature Conservation Committee (JNCC), Natural England and Cefas (2025)) where relevant, and applied to reduce the effects from underwater sound to a non-significant level.
29	**2.2.3 Use of low-order UXO clearance methods** 29. In our previous comments we recommended use of low-order UXO clearance methods, with high-order reserved only to be used in exceptional circumstances. We welcome the Applicant's decision to remove high-order clearance methods from the ML per activity 4, page 8 of *J9 Marine Licence Principes Document F06*, submitted 22 January 2025.	The Applicant notes and welcomes NRW (A)'s comment.
30	30. We bring attention to The Marine environment: unexploded ordnance clearance Joint Position Statement, to which NRW (A) are a signatory, published on 21 January 2025.	The Applicant notes the updated Joint Position Statement (Defra *et al*., 2025) published on 21 January 2025. Having reviewed this and the supporting guidance documents (Defra, 2025; JNCC, 2025), the Applicant can confirm that the Application for the Mona Offshore Wind Project complies with the latest policy and guidance regarding UXO clearance and has ensured that appropriate further consideration will be given to this policy and guidance during discharge of any relevant licence conditions should consent be granted. The Applicant acknowledges that low noise methods should be the default method of UXO clearance and that the Joint Position Statement states, 'high order clearance methods should always be the last resort'. As outlined in Row 33 of the Mitigation and Monitoring Schedule (J10 F07), the Applicant has committed to a UXO mitigation hierarchy which prioritises clearance of UXOs using low order techniques (if they cannot be first avoided). In addition, that Applicant has committed to the clearance of UXO by low order clearance techniques only under the standalone NRW Marine Licence. Should clearance using high order techniques be required as a last resort, a separate marine licence would be sought. This commitment is set out in row 111 of the Mitigation and Monitoring Schedule (J10 F07). As set out in the Marine Licence Principles document (J9 F06), this is expected to be secured in the standalone NRW Marine Licence.
31	**2.2.4 Other previous comments**	The Applicant notes and welcomes NRW (A)'s comment.

Paragraph Reference	Written Submission Comment	Applicant's response
	31. NRW (A) confirms that our previous comments on the following subjects have been resolved throughout the DCO process and with the latest updated version of ML application documents; 18. Content of the outline Underwater Sound Management Strategy (oUWSMS) and outline Marine Mammal Mitigation Plan (oMMMP) 19. Removal of the use of soft start "scare charges" for UXO clearance 20. Clarification regarding the metric used to measure % reduction in underwater sound 21. Consideration of the key findings of ORJIPs Range dependent nature of impulsive noise (RaDIN) project (ORJIP 2024). 22. Evidence has been provided to support the statement that "*it is anticipated any reduction in sound impacts from potential implementation of the NAS will act to mitigate impacts…*"	
32	32. NRW (A) consider that sufficient further information has been provided that we are able to agree with the Applicant's conclusions with respect to impacts on marine mammals. However, we wish to highlight that our previous advice regarding levels of impact, (including the potential to impact European Protected Species (EPS)) and our recommended approach to the assessment, remain.	The Applicant notes and welcomes NRW (A)'s statement that further information has been provided, which enables NRW (A) to agree with the Applicant's conclusions with respect to impacts on marine mammals. The Applicant acknowledges NRW (A)'s advice regarding levels of impact and recommended approach to the assessment.
33	**2.2.5 Licence conditions** 33. We maintain our previously stated recommendations regarding the need for the following to be included as a condition of the Transmission Asset ML; 23. Development of an UWSMS, sufficient to achieve the aims of reducing the impact of noise (including for EPS species), with commitment from the Applicant to continue to engage in consultation with NRW (A) and other SNCBs during development. We continue to recommend that agreement with the final version be sought, in writing, from SNCBs prior to the condition being discharged. 24. As is typical for offshore wind farm projects in the UK, a requirement to measure the underwater noise from the installation of the first four piles for each foundation type, or a representative number of pile locations, or the four largest piles. NRW (A) continue to recommend following a standardised approach to this monitoring requirement (ISO 18407:2017). We acknowledge that the	The Marine Licence Principles document (J9 F06) provides a tabulation of the principles which are anticipated to be included in the standalone NRW Marine Licence for the Mona Offshore Wind Project. This includes the UWSMS, with the principle that a 'marine licence condition will be needed to secure adherence to the UWSMS in accordance with strategy submitted as part of DCO and marine licence applications'. The drafting of the standalone NRW Marine Licence is a matter for NRW MLT. However, the Applicant's intention is to continue to consult with relevant SNCBs (including NRW (A)) throughout the development of the final UWSMS, as set out in the outline UWSMS (J16 F03). The Applicant welcomes acknowledgement from NRW (A) that the Applicant has committed to monitoring of the first four piles in the outline Marine Mammal Mitigation Protocol (MMMP) (J21 F03), which is set out in the Marine Licence Principles document (J9 F06) and is anticipated to be secured in the standalone NRW Marine Licence. The Applicant also

Paragraph Reference	Written Submission Comment	Applicant's response
	Applicant has already indicated their intention to carry out such monitoring in the *outline Marine Mammal Mitigation Protocol (MMMP) [J21].*	confirms that it shall adhere to the requirements and recommendations as set out in ISO18406:2017 (Measurement of radiated underwater sound from percussive pile driving) and ISO18405:2017 (Underwater acoustics Terminology).
34	**2.2.6 Recommendations for future assessment** 34. NRW (A) highlight that despite the compromise reached for this specific case, we maintain our previously stated position that a static radius does not capture the cumulative impact of a pathway which consists of chronic, but individually relatively small disturbance events from a moving source / sources. While we agree with the Applicant that recovery from vessel noise disturbance takes place relatively rapidly, we do not agree with the general assumption underpinning the Applicant's approach that because recovery from a single disturbance event would be rapid, then there would not be an effect from repeated episodes of disturbance as a result of there being multiple vessel trips in the area. We reiterate that in principle we have no concerns with the use of a fixed impact radius to provide a snapshot estimate of numbers disturbed at one point in time, and we also fully agreed with the Applicant that the radius selected was a conservative one. However, we advise that it should be clear in the assessment that the estimate was a snapshot at a single point in time, otherwise it would be inaccurate to state that a proportion of a Management Unit (MU) would be disturbed, in comparison to a methodology that in some way captures the movement of vessels. Further detail on this topic can be found in our submissions into the DCO process, most notably REP5-098.	The Applicant notes NRW (A)'s comment. Please see the Applicant's response in Row 27 above.
35	**2.3 Comments on the NRW MLTs draft HRA** 35. With regard to marine mammals, NRW (A) confirms that we agree with the screening assessment within the HRA, and, with the exception of the requested amendment below (para 36), with the Appropriate Assessment. We agree with the conclusions and that the mitigation measures are appropriate in order to reach conclusions of No AEoSI on sites / features.	The Applicant notes NRW (A)'s comments. This comment is relevant to NRW MLT's draft HRA.
36	36. As per our comments above, the ES requires amendment to reflect the agreed clarification regarding disturbance from vessel traffic, and as the MLT Form 1 HRA defers detailed assessment to the Applicant's documentation (*E1.2 HRA Stage 2 ISAA Part 2 Special Areas of Conservation F02*, which in turn references *F2.4 Volume 2, Chapter 4 marine mammals F02*), this also affects	

Paragraph Reference	Written Submission Comment	Applicant's response
	MLT's HRA. However as noted, we can agree with the overall conclusions regarding magnitude for vessel traffic.	
37	**3 FISH AND SHELLFISH** 37. The majority of the points raised by NRW (A) in our initial consultation response to the Transmission Asset ML (dated 29 August 2024) have been resolved during the course of the DCO process for the wider Mona project. These are detailed under each heading below. Advice previously submitted that has not been changed is repeated for clarity with a note stating 'advice unchanged'.	The Applicant notes and welcomes NRW (A)'s comment.
38	**3.1 Detailed comments** **3.1.1 Conservation of Habitats and Species Regulations 2017 (Reg 63)** 38. Advice unchanged from 29 August 2024: NRW (A) agrees with the screening undertaken in the Applicant's HRA Screening report (E1.4) and the subsequent ISAA (E1.2). We agree with the overall conclusion of no risk of an Adverse Effect on Site Integrity (AEoSI) on the integrity of diadromous fish features from the Welsh protected sites; Dee Estuary/Aber Dyfrdwy Special Area of Conservation (SAC), River Dee and Bala Lake/Afon Dyfrdwy a Llyn Tegid SAC, and Afon Gwyrfai a Llyn Cwellyn SAC.	The Applicant notes and welcomes NRW (A)'s comment.
39	39. NRW (A) agrees with the sites and features scoped into MLT's draft HRA and with the conclusions reached of no AEoSI to the Welsh diadromous fish sites within the scope of the development. Whilst it is unclear why piling noise and UXO is amalgamated for fish receptors, but included as separate impacts for marine mammals, this point does not, however, alter our agreement with the documents' conclusions and assessment.	The Applicant notes NRW (A)'s comments. This comment is relevant to NRW MLT's draft HRA.
40	**3.1.2 European Protected Species (EPS)** 40. Advice unchanged from 29 August 2024: We do not consider that the works have the potential to impact EPS fish species.	The Applicant notes and welcomes NRW (A)'s comment.
41	**3.1.3 Environment (Wales) Act 2016 (Section 7)** 41. NRW (A) previously advised that 'piling noise from the proposed development has the potential to impact a significant proportion of spawning cod, protected under section 7 of the Environment (Wales) Act 2016.' Whilst this advice has not changed, NRW (A) has had a number of discussions with the Applicant during	The Applicant notes NRW (A)'s comment.

Paragraph Reference	Written Submission Comment	Applicant's response
	the course of the wider DCO application following the submission of our advice to the transmission asset application consultation.	
42	42. These discussions have resulted in the Applicant submitting an update to the UWSMS, which includes specific mention of cod and herring and references to the type of mitigation that may be utilised to reduce the impact of underwater sound to these species. NRW (A) are content that the UWSMS should provide a sufficient mechanism to reduce the potential sound impacts of the development (across both transmission and generation assets) on both herring and spawning cod. As noted previously, we will continue to work closely with the Applicant to provide advice as they develop the detail of the UWSMS post consent. NRW (A) will need to be consulted in writing on the UWSMS and associated documents.	The Applicant notes NRW (A)'s comment and welcomes NRW (A)'s statement that they are content that the UWSMS will provide a sufficient mechanism to reduce the potential sound impacts of the Mona Offshore Wind Project (across both transmission and generation assets) on both herring and spawning cod. The drafting of the standalone NRW Marine Licence is a matter for NRW MLT. However, it is the Applicant's intention to continue to consult with relevant SNCBs throughout the development of the final UWSMS, as set out in the outline UWSMS (J16 F03). An updated outline UWSMS (J16 F03) has been submitted alongside this consultation response, but the Applicant confirms there are no changes relevant to mitigating piling impacts on fish, including herring and cod.
43	43. Our previous comments relating to '*approaches used for cod and herring – noise thresholds*' and '*sound exposure levels for assessing impacts*' have since been resolved during the DCO process.	The Applicant notes NRW (A)'s comment and welcomes NRW (A)'s agreement.
44	44. NRW (A) continues to disagree with the Applicant's assessment of the magnitude of harm in the '*alone*' assessment of underwater noise in relation to spawning cod as minor adverse. However, we are content that the UWSMS is likely to be a sufficient mechanism to reduce the noise impacts from the development on cod and herring from both alone and in-combination impacts.	The Applicant notes and welcomes NRW (A)'s comment.
45	**3.2 Additional comments** 45. Advice unchanged from 29 August 2024. NRW (A) are in agreement with the conclusions made in respect to the other impacts scoped into the Applicant's assessment (temporary habitat loss/disturbance; increased suspended sediment concentrations (SSC) and associated sediment deposition; long term habitat loss; Electromagnetic fields (EMFs) from subsea electrical cabling; introduction of artificial structures and colonisation of hard structures; disturbance/ remobilisation of sediment bound contaminants; injury due to increased risk of collision with vessels). No specific mitigation has been proposed for these, except for project embedded measures, which NRW (A) agrees are appropriate.	The Applicant notes and welcomes NRW (A)'s comment.
46	**3.2.1 Environment (Wales) Act 2016 (Habitats / Ecosystems)**	The Applicant notes and welcomes NRW (A)'s comment.

Paragraph Reference	Written Submission Comment	Applicant's response
	46. Advice unchanged from 29 August 2024. There is the potential for works such as sandwave clearance activities to impact fish that spawn on or near the seabed, however NRW (A) agrees with the Applicant's assessment of minor adverse within the fish and shellfish ecology document (F2.3) due to the temporary nature of the activity, the limited extent of suitable substrate available within the construction envelope for herring and the extent of available habitat that would remain for sandeel populations.	
47	**3.2.2 Marine and Coastal Access Act Part 5: Nature Conservation** 47. Advice unchanged from 29 August 2024. As there are no fish receptors within the sole Welsh MCZ, there is no pathway.	The Applicant notes and welcomes NRW (A)'s comment.
48	**3.2.3 Water Framework Directive** 48. Advice unchanged from 29 August 2024. NRW (A) agrees with the WFD assessment made by the Applicant, in which it was assessed that there will be no potential impacts for fish within the North Wales or Clwyd water bodies.	The Applicant notes and welcomes NRW (A)'s comment.
49	49. NRW (A) agrees with MLTs WFD assessment conclusions. Fish have been included as an element within the North Wales coastal water body, which is not required.	
50	**3.2.4 Comments on S_NRWML_3_Mona_Responses to NRW (A)** 50. NRW (A) raised a number of points during the previous Transmission Asset consultation, which have been resolved during the course of the DCO application.	The Applicant notes and welcomes NRW (A)'s comment.
51	51. Previous points raised by NRW (A) relating to noise thresholds and noise modelling (Ref no's: 64, 73, 75, 76, 77, 78) have been resolved during the DCO process through discussions with the Applicant. Items we raised on cod and herring behaviours and ecology (Ref no's: 68, 69, 70, 71, 74, 75) have been addressed through the DCO process, with some being resolved through the inclusion of both species within the UWSMS and through discussions with the Applicant.	
52	52. The UWSMS (Ref. no: 65, 79, 80, 82, 81, 90-101) has since been updated and NRW (A) are content with the document as it currently stands. We will continue to work with the Applicant as they further develop the document post consent (see section 3.2.1 above). NRW (A) will need to be consulted in writing on the drafting and finalisation of the UWSMS and associated plans.	The Applicant notes NRW (A)'s comment. The drafting of the standalone NRW Marine Licence is a matter for NRW MLT. It is the Applicant's intention to continue to consult with relevant SNCBs throughout the development of the UWSMS post-consent, as set out in the outline

Paragraph Reference	Written Submission Comment	Applicant's response
		UWSMS (J16 F03). It will then be for NRW MLT to consult the appropriate SNCBs for their approval on the final UWSMS.
53	53. NRW (A) continues to disagree with the Applicant's assessment of the magnitude of harm in the '*alone*' assessment of underwater noise in relation to spawning cod (Ref no. 63, 68), however, we are content that the UWSMS is likely to be sufficient to reduce the noise impacts from the development on cod and herring from both alone and in-combination impacts.	The Applicant notes NRW (A)'s comment and refers to its response in Row 44 above.
54	**4 PHYSICAL PROCESSES** **4.1 Main Matters** 54. NRW (A) has provided detailed comments during the DCO examination process and as a result, all the outstanding concerns relating to physical processes have been resolved. The ML application for the Transmission Asset of the Mona Offshore Windfarm includes all the updated documents submitted during the final stages of the DCO examination. NRW (A) have cross checked that the issues previously raised and subsequently resolved for physical processes have been secured in the relevant documentation submitted for the Transmission Asset ML. NRW (A) are satisfied that all matters have been resolved and are captured in the relevant documents submitted for the Transmission Asset ML. However, we wish to reiterate the following commitments in section 4.2.1 below confirmed by the Applicant and to ensure that the commitments are properly secured as conditions in the proposed standalone Transmission Asset ML.	The Applicant notes NRW (A)'s comment and welcomes NRW (A)'s statement that all of the outstanding concerns relating to physical processes have been resolved.
55	**4.2 Detailed comments** **4.2.1 J10 F07 MONA OFFSHORE WIND PROJECT Mitigation and Monitoring Schedule Reference 8 and 14.** 55. NRW (A) welcomes the Applicant's expectation that a condition will be imposed within the standalone NRW Transmission Asset 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 advise that this commitment should be captured in both the DCO dML and the Transmission Asset ML via the offshore Construction Method Statement (oCMS) and the Cable Specification Installation Plan (CSIP). NRW (A) will need to be consulted in writing on the suitability of the oCMS and CSIP during drafting and finalisation.	The Applicant notes NRW (A)'s comment and highlights that the precise wording of the commitment set out in Row 8 and 14 of the Mitigation and Monitoring Schedule (J10 F07) is that "*no more than a 5% reduction in water depth (referenced to Chart Datum) will occur as a result of cable protection at any point over cables without prior written approval from the Licensing Authority in consultation with the Maritime and Coastguard Agency (MCA) and Trinity House. In the event any cable protection exceeds 5% of navigable depth referenced to Chart Datum in the shallow nearshore area, NRW will also be a named consultee with regards to agreeing a suitable alternative position*". This commitment is also set out in the Marine Licence Principles document (J9 F06). The drafting of the standalone NRW Marine Licence is a matter for NRW MLT. However, it is the Applicant's intention to continue to consult with relevant SNCBs

Paragraph Reference	Written Submission Comment	Applicant's response
		throughout the development of the final offshore Construction Method Statement (oCMS) and Cable Specification and Installation Plan (CSIP).
56	56. NRW (A) previously requested that the mitigation was amended to ensure that where the 5% restriction in water depth is exceeded, the Applicant will consult with NRW (A) in agreeing an alternative position. The Applicant agreed to this, noting that this discussion will require consideration of whether further physical processes assessment would be required, and if so on what terms that assessment would be undertaken. The submitted *Mitigation and Monitoring Schedule (J10 F07*, reference numbers 8 and 14) details that the Applicant has committed to consulting NRW with regards to agreeing an alternative position but not specifically NRW (A). NRW (A) request that in the event that the 5% restriction in water depth is exceeded, that the Marine Licencing team consults NRW (A) in writing. NRW (A) reiterates that the above commitment by the Applicant to consider an alternative position if the 5% restriction in water depth is exceeded should be secured in the stand alone ML CSIP (as stipulated in the Marine Licence Principles document) as part of the OCMS.	The Applicant notes NRW (A)'s comment. The Applicant has considered whether it is appropriate to name NRW (A) in relation to this matter, and this was discussed with NRW during a meeting on 7 January 2025. On the advice of NRW's legal counsel, all references to the Natural Resources Body for Wales in the Mitigation and Monitoring Schedule (J10 F07) and wider NRW ML Application refer to 'NRW'. It was not considered necessary to provide further description by reference to functions or departments of NRW, as it would be expected that NRW MLT would consult the relevant departments in exercising its duties as the relevant licensing authority. The Applicant highlights that the drafting of the standalone NRW Marine Licence is a matter for NRW MLT.
57	**4.2.2 J15 F03 Mona Offshore In-principle Monitoring Plan and J10 F07 Mitigation and Monitoring Schedule** 57. *Table 1.2: Key issues raised during consultation activities undertaken for the Mona Offshore Wind Project relevant to monitoring*, states that "*the data collected through the pre- and post-construction geomorphological surveys which the Applicant has committed to for cable burial monitoring purposes will be considered in the context of sandwave recovery, particularly in relation to Constable Bank*", which addresses the concerns raised by NRW (A) during the DCO examination process. *Table 1.3* of the *Offshore In-principle Monitoring Plan (J15 F03)* details the pre and post construction monitoring proposed by the Applicant, and a commitment by the Applicant to secure this monitoring through Reference number 100 of the *Mitigation and Monitoring Schedule (J10 F07),* and expected to be secured through the standalone NRW ML.	The Applicant notes NRW (A)'s comment.
58	58. NRW (A) reiterates that Reference number 100 of the *Mitigation and Monitoring Schedule (J10 F07)* refers only to monitoring of cable and their burial status and does not refer to pre-construction baseline geophysical surveys to establish baseline sand-wave levels and post-construction geophysical surveys to establish sand wave recovery following cable installation particularly in relation	The Applicant notes NRW (A)'s comment. The drafting of the standalone NRW Marine Licence is a matter for NRW MLT. However, it is the Applicant's expectation that pre- and post-construction monitoring (as identified in the Offshore In-Principle Monitoring Plan (J15 F03)) will be secured in the standalone NRW Marine Licence. As per Table 1.3 of the Offshore In-Principle Monitoring Plan (J15 F03), swath-bathymetry and

Paragraph Reference	Written Submission Comment	Applicant's response
	to Constable Bank. NRW (A) reiterates that the pre and post construction monitoring should be secured in the stand alone ML for the Transmission Asset.	side scan sonar survey data from the post-construction geophysical surveys will be used to establish changes to, and recovery of, a representative sample of sandwaves within the Mona Offshore Wind Project Order Limits following sandwave clearance and cable installation activity, particularly in relation to the Constable Bank.
59	**4.2.3 J26.14 F05 Mona Outline Landfall Construction Method Statement** 59. NRW (A) welcomes the Applicant's commitment as detailed in section 1.10.3.2 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.	The Applicant notes and welcomes NRW (A)'s comment.
60	**4.2.4 ORML2429T draft WFD February 2025** 60. No comments from a physical processes (hydromorphology) perspective. Seabed disturbance and the generation of Suspended Sediment Concentration (SSC) plumes have been correctly assessed with regards to WFD water body status of the North Wales Coastal Water Body and the Clwyd transitional water body.	The Applicant notes NRW (A)'s comments. This comment is relevant to NRW MLT's draft WFD and HRA.
61	**4.2.5 ORML2429T draft HRA February 2025** 61. We note that in section 4.2 of MLT's HRA, the mitigation measures detailed for impacts to reef and sandbank features related to changes in physical processes are "*No more than 5% reduction in water depth (referenced to Chart Datum) will occur at any point along the Mona Offshore Cable Corridor unless otherwise approved. This measure can be secured within the marine licence.*" We advise that this should be amended to include the provision that in the event that the 5% restriction in water depth is exceeded, that the Marine Licencing team consults NRW (A) in writing in agreeing an alternative position, which may require further physical processes assessment. Please refer to paragraphs 55 and 56 above for further detail. In addition, we advise that the wording in the draft HRA that states "This measure can be secured within the marine licence" should be changed to "This measure should be secured within the marine licence", given that we consider that this mitigation measure needs to be appropriately secured and conditioned within the deemed ML and standalone ML.	
62	62. Provided that the above amendment is carried out, we confirm that we have no further comments and agree with the conclusions of the HRA.	The Applicant notes and welcomes NRW (A)'s comment.

Paragraph Reference	Written Submission Comment	Applicant's response
63	**5 BENTHIC SUBTIDAL AND INTERTIDAL ECOLOGY** 63. NRW (A) has reviewed the updated ML application documents and, given progress through the DCO process, we are satisfied that all previous matters with regards to the potential impacts to benthic subtidal and intertidal ecology have been addressed. Furthermore, all caveats and agreements have been appropriately secured in the relevant documents provided, which includes an offshore CMS, the CSIP, Biosecurity Risk Assessment and Invasive Non-Native Management Plan, the MPCP and offshore EMP as well as the Outline Landfall Construction Method Statement (OLCMS).	The Applicant notes NRW (A)'s comment and welcomes NRW (A)'s statement that they are satisfied that all previous matters with regards to the potential impacts to benthic subtidal and intertidal ecology have been addressed.
64	64. Please also refer to the physical process section above (4.2.1), with respect to requirement for consultation with NRW (A) in agreeing an alternative position in the event that the 5% restriction in water depth is exceeded along the cable corridor.	Please see the Applicant's responses in Rows 55 and 56 above.
65	**5.1 Comments on NRW MLT's draft HRA** 65. With the exception of the comments made in the Physical Processes section at 4.2.5 above, with respect to requirement for consultation with NRW (A) in agreeing an alternative position in the event that the 5% restriction in water depth is exceeded along the cable corridor NRW (A) agrees with the conclusions of the draft HRA from a benthic ecology perspective.	The Applicant notes and welcomes NRW (A)'s comment on NRW MLT's draft HRA.
66	**5.2 Comments on NRW MLTs draft WFD Compliance Assessment** 66. Please see section 7.2.4 below.	Please see the Applicant's responses in Rows 77 to 98 below.
67	**6 MARINE WATER AND SEDIMENT QUALITY (MW&SQ)** **6.1 Conservation of Habitats and Species Regulations (2017) and MLT's HRA** 67. NRW (A) agrees with the conclusion that there is no potential for LSE on Annex I habitats of the Menai Strait and Conwy Bay/Y Fenai a Bae Conwy SAC as a result of [1] an increase in SSC and sediment deposition; or [2] accidental pollution where the impacts can be mitigated through the implementation of an Offshore EMP and MPCP; during the construction and decommissioning phases and the operations and maintenance phases of the proposed activities. However, please see further detail in section 7.3 below.	The Applicant notes and welcomes NRW (A)'s comment.
68	**6.2 Water Framework Directive Compliance Assessment**	The Applicant notes and welcomes NRW (A)'s comment.

Paragraph Reference	Written Submission Comment	Applicant's response
	68. NRW (A) agrees with the assessment, and conclusions from detailed assessment, that impacts from the proposed works pose no risk to deterioration in the waterbody status or prevent the North Wales or Clwyd water bodies from meeting their objectives with respect to water quality. This is discussed in further detail within section 7.2, and specifically section 7.2.4 below.	
69	69. NRW (A) supports the inclusion of the seven identified bathing waters, and agrees with the detailed assessment that the proposed works will not cause a deterioration in the status of the Abergele (Pensarn) bathing water. The other identified bathing waters are located further away from the centre of the impact, and we therefore agree with the assessment conclusion of no risk of deterioration. Please also see section 7.2.3 below.	
70	**7 WATER FRAMEWORK DIRECTIVE (WFD) - COASTAL AND TRANSITIONAL WATER BODIES: OFFSHORE WORKS** **7.1 Water Framework Directive** **7.1.1 General Comments** 70. The Applicant has proposed various schemes of mitigation to reduce any adverse effects of the proposed works on the marine environment. To ensure this mitigation is enacted, we advise it is secured through post-consent licence conditions.	The drafting of the standalone NRW Marine Licence is a matter for NRW MLT. However, The Mitigation and Monitoring Schedule (J10 F07) and Marine Licence Principles document (J9 F06) demonstrate that the Applicant anticipates that these schemes of mitigation will be secured within the standalone NRW Marine Licence.
71	71. Through the DCO process, the Applicant committed to changes in the methodology for the proposed works, and also to the assessment of the impact of these works. It was also established where there is unlikely to be any significant effects from the works on a spatial area specific to the DCO (i.e. further offshore). The agreements reached through the DCO process are of less relevance for the transmission assets (i.e. within 12 nm to MHWS), and the Applicant did not provide additional or revised assessments for the works specific to the Marine Licence application.	The Applicant notes NRW (A)'s comments and welcomes agreement on the conclusions of the Water Framework Directive (WFD) Coastal Waters Assessment (F6.2.2 F02). The Applicant highlights that this assessment took account of best practice guidance available at the time of writing and considered the Mona Offshore Wind Project as a whole, focusing on activities within 12 nm of MHWS. The Applicant acknowledges advice received from NRW (A) in respect of the application of best practice guidance and has engaged with NRW (A) to understand how this matter can be resolved. The Applicant subsequently prepared a WFD Coastal Waters Assessment supporting information (S_D3_13) document, which was submitted into the standalone NRW Marine Licence process on 23 January 2025. This took account of feedback received from NRW (A) (received via email on 20 September 2024) as well as updated NRW guidance: GN078 (2024a; 2024b; 2024c) published in June 2024 and available publicly in December 2024, following submission of the standalone NRW Marine Licence application. Again, the supporting
72	72. The Applicant used (now superseded) EA guidance to inform their assessment of compliance with the WFD regulations. The Applicant did not apply this guidance correctly (i.e. as intended), however we are able to agree with the conclusions drawn overall This is discussed in further detail below.	

Paragraph Reference	Written Submission Comment	Applicant's response
		information considered the Mona Offshore Wind Project as a whole and is therefore relevant to the standalone NRW Marine Licence process. The Applicant understood from further engagement in November 2024 and January 2025 that NRW (A) had no further queries or concerns regarding the assessment of WFD compliance.
73	**7.2 WFD Regulations Compliance Assessment** (*Directive 2000/60/EC of the European Parliament and of the Council of 23 October 2000 establishing a framework for Community action in the field of water policy The Water Environment (Water Framework Directive) (England and Wales) Regulations 2017)* **7.2.1 General comments** 73. For clarity, we advise the references to an "extended ZoI" are removed from the WFD Compliance Assessment (CA). The ZoI that NRW (A) continue to recommend for use in assessment of the effects of the proposed activity is that which was identified through numerical modelling (*ES Volume 2, Chapter 1: Physical processes [F2.1] and ES Volume 6, Annex 1.1: Physical processes technical report [F6.1.1]).* No other numerically modelled ZoI has been presented in support of the assessment of the impacts of the proposed works. We maintain our position that an arbitrary ZoI based on a 2 km "buffer" beyond the activity footprint is not appropriate for assessment of impacts in compliance with the WFD regulations. The reference to a buffer area (2 km) in the superseded EA guidance (superseded by NRW guidance: GN078) may be applied to extend the numerically modelled ZoI where sensitive habitats are being considered. The modelled ZoI has been applied appropriately for assessment of impact of chemical contaminants. We highlight that the method of assessment used by the Applicant to develop the WFD compliance supporting information did not follow recommended guidance and is not in line with advice previously given. However, we consider the conclusions of the draft WFD Compliance Assessment do comply with the WFD regulations.	The Applicant notes NRW (A)'s comment and welcomes NRW (A)'s view that the conclusions of the draft WFD Compliance Assessment comply with the WFD regulations. The Applicant has had further discussion with NRW (A) regarding the consideration of an appropriate Zone of Influence (ZoI) and provided additional information in the WFD Coastal Waters Assessment supporting information (S_D3_13) document, which considered a ZoI based on the physical processes' numerical modelling as advised by NRW (A). This information also took account of the NRW guidance: GN078 (2024a; 2024b; 2024c) published in June 2024, following the preparation and submission of the standalone NRW Marine Licence application. Through subsequent engagement, NRW (A) has agreed with the Applicant's conclusions that the ZoI based on physical processes numerical modelling is appropriate and sufficient. The Applicant understood that NRW (A) had no further queries or concerns regarding its assessment of WFD compliance. It should be noted that the term "extended ZoI" was used by the Applicant in the WFD Coastal Waters Assessment supporting information (S_D3_13) document to distinguish from the zone of influence (ZoI) considered at Application. This term is not used within the Water Framework Directive (WFD) Coastal Waters Assessment (F6.2.2 F02). NRW (A)'s comment related to the removal of this term from the WFD Compliance Assessment is therefore assumed to refer to NRW MLT's draft WFD Compliance Assessment.
74	**7.2.2 Screening of Activity and affected Waterbodies** 74. NRW (A) agrees with the screening decision to include the North Wales and Clwyd waterbodies for assessment of compliance with the WFD regulations for the proposed activity and any in combination impacts.	The Applicant notes and welcomes NRW (A)'s comment.

Paragraph Reference	Written Submission Comment	Applicant's response
75	75. We continue to advise as per our advice on 29 August 2024 to include the justification for the exclusion of the Dee (North Wales) Waterbody in the screening process for consideration of quality element scoping and detailed assessment, and consideration of impacts on WFD protected areas. We note that the Mersey Mouth WFD waterbody was identified in the screening process and justification for its exclusion is given in the compliance assessment.	Three Transitional and Coastal (TraC) WFD water bodies were identified in Part 4, Annex B (Water Framework Directive Screening) of the Mona Offshore Wind Project EIA Scoping Report (Mona Offshore Wind Ltd., 2022). These were (north to south): 25. Mersey Mouth water body (GB641211630001) 26. North Wales water body (GB641011650000) 27. Clwyd water body (GB541006608000). Numerical modelling presented in Volume 6, Annex 1.1: Physical processes technical report (F6.1.1) indicated that impacts would not overlap spatially with any other TraC WFD water bodies and paragraph 1.3.2.12 of Volume 6, Annex 2.2 WFD Coastal Waters Assessment (F6.2.2) summarises that, in light of the numerical modelling and low levels of disturbance, the 2 km ZoI is considered sufficient. Therefore, other waterbodies beyond 2 km of the activity (e.g. Dee (North Wales), Conwy Bay and Anglesey North)) would not be screened in. No specific additional TraC WFD water bodies were requested to be screened in as part of the NRW (A) Scoping Response (presented within Appendix 2 of the Mona Offshore Wind Project Scoping Opinion (J8)). Following this, no additional TraC WFD water bodies were requested for assessment as part of the NRW (A) Section 42 feedback presented in Consultation Report Appendices- Part 3 (D.25 - F) (E3.1). NRW (A) advised the Applicant in their standalone NRW Marine Licence consultation response on 30 August 2024 that if the Dee (North Wales) Waterbody was screened in, they would not expect any quality elements to be in scope for further consideration or assessment. The Applicant has had further discussion with NRW (A) in regard to this matter, and NRW (A) supports the justification for excluding other water bodies, including Dee (North Wales), Conwy Bay and Anglesey North. NRW (A)'s conclusions from these further discussions should therefore also apply with regards to the standalone NRW Marine Licence.
76	**7.2.3 WFD protected areas** 76. NRW (A) supports the inclusion of the seven identified bathing waters. We agree with the detailed assessment that the proposed works will not cause a deterioration in the status of the Abergele (Pensarn) bathing water. The other	The Applicant notes and welcomes NRW (A)'s comment.

Paragraph Reference	Written Submission Comment	Applicant's response
	identified bathing waters (Llandudno North Shore; Colwyn Bay; Colwyn Bay Porth Eirias; Kinmel Bay; Rhyl; and Rhyl East) share a common hydrological catchment with Abergele (Pensarn) and share common management practices and challenges. As these bathing waters are located further away from the centre of the impact, we agree with the assessment conclusion of no risk of deterioration.	
77	**7.2.4 Scoping to establish the relevant likely effects and detailed assessment** **7.2.4.1 North Wales Waterbody** 77. NRW (A) agrees with the overall scoping decision that there is a risk the proposal may cause deterioration or prevent the water body from meeting its objectives and therefore a detailed compliance assessment might be required.	The Applicant notes and welcomes NRW (A)'s comment.
78	*7.2.4.1.1* ***Hydromorphology*** 78. NRW (A) agrees that when mitigation measures are accounted for, there is no risk of the activity preventing the waterbody from meeting its objectives and no risk of deterioration with respect to the hydromorphology quality element.	
79	79. An assessment of no potential impact on the hydromorphology of the North Wales Waterbody is predicated on the expectation that a condition will be imposed within the standalone NRW Marine Licence securing the commitment to limit changes in water depth to 5% caused by the presence of cable protection along the export cable corridor up to and including the exit pits seaward of Mean Low Water Springs (MLWS).	The Applicant notes NRW (A)'s comment. The drafting of the standalone NRW Marine Licence is a matter for NRW MLT. However, as indicated in the Marine Licence Principles document (J9 F06), the Applicant's anticipates that the standalone NRW Marine Licence will secure a CSIP including the commitment that no more than a 5% reduction in water depth (referenced to Chart Datum) will occur at any point along the Mona offshore cable corridor without prior written approach from the Licensing Authority in consultation with the MCA and Trinity House. As per Row 8 of the Mitigation and Monitoring Schedule (J10 F07), in the event any cable protection exceeds 5% of navigable depth referenced to Chart Datum in the shallow nearshore area, NRW is expected to also be a named consultee with regards to agreeing a suitable alternative position.
80	**Recommendation:** 80. We advise that this commitment is secured as post-consent conditions of the transmission assets Marine Licence (TA ML) via the CMS (construction method statement) and CSIP (cable specification installation plan).	
81	***7.2.4.1.2 Water Quality*** 81. NRW (A) agrees with the assessment that water quality quality-elements are at risk of impact from the proposed activities and should be scoped in for detailed assessment in the North Wales waterbody.	The Applicant notes and welcomes NRW (A)'s comments.

Paragraph Reference	Written Submission Comment	Applicant's response
82	82. Based on the modelling of the sediment plume and the expected rate of sedimentation, NRW (A) agrees with the assessment that SSC from the proposed works has no potential to cause a deterioration in the waterbody status or prevent the North Wales water body from meeting its objectives with respect to water quality.	
83	83. NRW (A) agrees with the assessment that phytoplankton should be assessed for impact from the proposed activities and should be scoped in for detailed assessment in the North Wales waterbody since the waterbody has been classified as moderate for this quality-element.	
84	84. NRW (A) agrees with the conclusions that as the effects of an increase in SSC are modelled to be temporary, short-term and intermittent over a 14-day spring/neap tidal cycle, there is unlikely to be any impact on the growth of phytoplankton from the proposed activity.	
85	85. NRW (A) agrees that any further effects from an increase in SSC (such as an increase in bacterial counts within the water column and a decrease in DO through the decomposition of sediment nutrient-induced phytoplankton blooms) pose no risk of deterioration in the waterbody status and there is no risk of the activity preventing the waterbody from meeting its objectives with respect to the water quality quality-elements.	
86	86. NRW (A) agrees with the assessment that the proposed works are not likely to cause a deterioration in the status of the North Wales waterbody with respect to heat generated by offshore export cables.	
87	87. NRW (A) agrees that there is no risk of the activity preventing the water body from meeting its objectives or of deterioration of the waterbody or any of its quality elements with respect to the remobilisation of sediment bound contaminants.	
88	88. We support the method of assessment to use the sediment contaminant analysis data for samples taken out to 12 nm from MHWS. Although the number of analysed sediment samples is fewer than we would consider best practise, we agree that the coarse nature of the sediments in the transmission asset activity area decreases the likelihood of occurrence of contaminants of a concentration exceeding CEFAS AL1.	

Paragraph Reference	Written Submission Comment	Applicant's response
89	***7.2.4.1.3 Biology*** 89. NRW (A) agrees with the assessment that *Sabellaria* reef and mussel beds (higher sensitivity habitats) are at risk of impact from the proposed activities and should be scoped in for detailed assessment in the North Wales waterbody.	The Applicant notes and welcomes NRW (A)'s comments.
90	90. NRW (A) agrees with the assessment that intertidal soft sediments like sand and mud and subtidal soft sediments (lower sensitivity habitats) are at risk of impact from the proposed activities and should be scoped in for detailed assessment in the North Wales waterbody.	
91	91. NRW (A) agrees with the conclusion that it is unlikely for the maximum footprint of the activity of 0.055 km2 to exceed 1% of any lower sensitivity habitat.	
92	92. NRW (A) agrees with the conclusion of the assessment that the proposed activity is unlikely to cause any deterioration to the North Wales waterbody status or to any of the quality elements that are assessed to inform the status.	
93	93. We note the mitigation measures proposed (para 1.5.1.5; detailed in Volume 2, Chapter 2: Benthic subtidal and intertidal ecology of the Environmental Statement) to lessen the likelihood of negative impact on the areas of higher sensitivity habitat (*S. alveolata* and blue mussel habitat); namely the active siting of the boundary extent of the proposed works away from these habitats.	
94	**Recommendation:** 94. The mitigation measures the Applicant has committed to in their ES (active siting of the boundary extent of the proposed works) should be captured as a post-consent condition of the Marine Licence to ensure WFD regulations compliance.	The Applicant notes NRW (A)'s comment. The Mona Offshore Wind Project NRW Marine Licence Area does not include the areas of higher sensitivity habitat referred to in Row 93 above. As such, there is nothing to secure as a post-consent condition since the area is not part of the marine licence application.
95	***7.2.4.1.4 Fish*** 95. NRW (A) advises that there is no need for assessment of fish in coastal waterbodies as they are not considered as a quality-element for coastal waterbodies.	The Applicant notes and welcomes NRW (A)'s comment.
96	***7.2.4.1.5 INNS*** 96. NRW (A) acknowledges the commitment of the Applicant to produce an Offshore Environmental Management Plan (EMP) and a Marine Pollution	The Applicant notes NRW (A)'s comment.

Paragraph Reference	Written Submission Comment	Applicant's response
	Contingency Plan (MPCP) to prevent the spread of INNS from the proposed activities.	
97	**Recommendation:** 97. The mitigation measures the Applicant has committed to produce as part of their MPCP and EMP should be captured as post-consent conditions of the Marine Licence for the proposed works associated with the transmission assets to ensure WFD regulations compliance.	The Applicant notes NRW (A)'s comment. The drafting of the standalone NRW Marine Licence is a matter for NRW MLT. However, The Mitigation and Monitoring Schedule (J10 F07) and Marine Licence Principles document (J9 F06) demonstrate that the Applicant anticipates that these schemes of mitigation will be secured within the standalone NRW Marine Licence.
98	**7.2.4.2 Clwyd Waterbody** 98. NRW (A) agrees with the Applicant's assessment that the proposed works have no potential to prevent the Clwyd water body from meeting its objectives with respect to hydrology or morphology (Hydromorph), biology, fish, water quality or chemical contaminants, nor will they impact the any measures or improvement activities (where applicable) for the Clwyd waterbody. We also agree with the Applicant's assessment of no potential to introduce or spread INNS within the Clwyd waterbody as there is no proposed activity or vessel activity within the waterbody.	The Applicant notes and welcomes NRW (A)'s comment.
99	**7.3 Conservation of Habitats and Species Regulations 2017** **7.3.1 Overview** 99. NRW (A) agrees with the conclusion that there is no potential for LSE on Annex I habitats of the Menai Strait and Conwy Bay/Y Fenai a Bae Conwy SAC as a result of [1] an increase in SSC (suspended sediment concentration) and sediment deposition; or [2] accidental pollution where the impacts can be mitigated through the implementation of an Offshore EMP and MPCP; during the **construction and decommissioning phases** and the **operations and maintenance phases** of the proposed activities.	The Applicant notes and welcomes NRW (A)'s comment.
100	**7.3.2 Detailed comments** **Conservation of Habitats and Species Regulations Assessment** **7.3.2.1 Screening of designated sites** 100. NRW (A) agrees with the output of the numerical modelling of the sediment plume (and so the ZoI on sediment and water quality for the proposed activity) that concludes the proposed activity overlaps with only one SAC (Menai Strait and Conwy Bay/Y Fenai a Bae Conwy) for indirect impacts. We accept the	The Applicant notes and welcomes NRW (A)'s comment.

Paragraph Reference	Written Submission Comment	Applicant's response
	conclusion that beyond the modelled buffer, any increases in SSC and sediment deposition would be within the range expected to be observed within natural background variation levels and so would not cause a likely significant effect on any designated feature of the SAC.	
101	**7.3.2.2 Adverse effect on site integrity (SSC)** ***7.3.2.2.1 Adverse effects on qualifying features*** 101. The Applicant concluded that seabed preparation and the installation of offshore export cables may cause an increase in SSC (suspended sediment concentration) and sediment deposition during the **construction phase** of the proposed activities and that the Annex 1 designated features of the Y Fenai a Bae Conwy/ Menai Strait and Conwy Bay SAC are potentially vulnerable to reduced water clarity and smothering.	The Applicant notes and welcomes NRW (A)'s comments.
102	102. NRW (A) acknowledges the commitment of the Applicant to the development of an offshore construction method statement (CMS) that will minimise the potential impacts on the designated features by not permitting sandwave clearance within the SAC.	
103	103. NRW (A) agrees with the HRA conclusion that there will be no adverse effect on the qualifying features of the SAC from SSC or sedimentation during the **construction phase** of the project if the proposed mitigation to be developed for the CMS is adhered to.	
104	104. NRW (A) agrees with the HRA conclusion that the impacts of activities related to the **operations and maintenance phases** of the project are likely to be substantially lower than during the construction phase. As such we agree with the conclusion of no adverse effect on the qualifying features of the SAC from SSC or sedimentation during this phase of the proposed activity.	
105	***7.3.2.2.2 Recommendation*** 105. We advise NRW MLT to include mitigation of adverse effects of SSC through the development of and adherence to an offshore construction method statement (CMS), which includes a Cable specification and installation plan (CSIP), as a licence condition to the proposed activity.	The Applicant notes NRW (A)'s comment. The drafting of the standalone NRW Marine Licence is a matter for NRW MLT. However, the Mitigation and Monitoring Schedule (J10 F07) and Marine Licence Principles document (J9 F06) demonstrate that the Applicant anticipates that these schemes of mitigation will be secured within the standalone NRW Marine Licence.
106	***7.3.2.2.3 In-combination effects***	The Applicant notes and welcomes NRW (A)'s comment.

Paragraph Reference	Written Submission Comment	Applicant's response
	106. NRW (A) agrees with the HRA conclusion that there will be no adverse effects on the qualifying features linked to the conservation objectives of the Menai Strait and Conwy Bay/Y Fenai a Bae Conwy SAC from an in-combination increased SSC and associated sediment deposition during the **construction and decommissioning phases** of the Mona Offshore Wind Project (E1.2 para 1.5.4.16) or the **operations and maintenance phases** (E1.2 para 1.5.4.40).	
107	107. The HRA concluded that the effects associated with sediment deposition will be limited in spatial extent and of short duration. The potential for in-combination effects is limited as the majority of other activities in the region are occurring outside of the SAC and their impacts are unlikely to overlap with the sediment plume generated by activity from the Mona Offshore Wind proposed activity.	
108	**7.3.2.3 Adverse effect on site integrity (accidental pollution)** ***7.3.2.3.1 Adverse effects on qualifying features*** 108. **NRW (A) agrees with the Applicant's conclusion that although without mitigation** there is potential for LSE on Annex I habitats of the Menai Strait and Conwy Bay/Y Fenai a Bae Conwy SAC from accidental pollution during the **construction and decommissioning phases** and the **operations and maintenance phases** of the proposed activities, these impacts can be mitigated through the implementation of an Offshore EMP and MPCP.	The Applicant notes and welcomes NRW (A)'s comments.
109	109. NRW (A) agrees that the source of this pressure is likely to occur from the vessels operating in the transmission cable corridor.	
110	110. NRW (A) agrees that should an event occur, effects will be temporary, reversible and limited in spatial extent for both reefs and sandbanks.	
111	***7.3.2.3.2 Recommendation*** 111. We advise NRW MLT to include mitigation through the development of and adherence to an offshore EMP and MPCP as a licence condition to the proposed activity. The plans should set out industry good practice and OSPAR (Oslo-Paris), IMO (International Maritime Organization) and MARPOL (International Convention for the Prevention of Pollution from Ships) guidelines for preventing pollution at sea.	The Applicant notes NRW (A)'s comment. The drafting of the standalone NRW Marine Licence is a matter for NRW MLT. However, the Mitigation and Monitoring Schedule (J10 F07) and Marine Licence Principles document (J9 F06) demonstrate that the Applicant anticipates that these schemes of mitigation will be secured within the standalone NRW Marine Licence.
112	***7.3.2.3.3 In-combination effects***	The Applicant notes and welcomes NRW (A)'s comment.

Paragraph Reference	Written Submission Comment	Applicant's response
	112. NRW (A) agrees that based on the assessment, there will be no in-combination effects from other plans or projects where no LSE alone has been concluded.	
113	**7.3.2.4 Adverse effect on site integrity (remobilisation of sediment bound contaminants)** ***7.3.2.4.1 Adverse effects on qualifying features*** 113. Disturbance/remobilisation of sediment-bound contaminants may result in harmful and adverse effects on benthic communities. The highly localised nature of the proposed activities combined with the low levels of contaminants found in the site-specific sediment samples are unlikely to cause significant effect. We have previously advised that this impact pathway can be screened out for assessment (E1.4 HRA stage 1 screening report). We therefore have no concerns that this impact pathway has not been included for assessment in the HRA.	The Applicant notes and welcomes NRW (A)'s comment.
114	***7.3.2.4.2 In-combination effects*** 114. The in-combination effects of the remobilisation of sediment bound contaminants from other plans or projects with the proposed activities do not need to be assessed for its potential for LSE.	The Applicant notes and welcomes NRW (A)'s comment.
115	**8 DESIGNATED LANDSCAPES** **8.1 Detailed Comments** 115. Our landscape advice relates to the Isle of Anglesey (IoA) National Landscape (NL), Eryri National Park (ENP), and the Clwydian Range and Dee Valley (CRDV) NL, and the statutory purpose of these designations to conserve and enhance their natural beauty. For the purposes of this advice, these designations are referred to collectively as Statutory Designated Landscapes (SDLs).	The Applicant notes NRW (A)'s comment.
116	116. Transmission assets proposed as part of the Mona Offshore Windfarm Project comprise: 28. up to 4 x export cables, 29. 3 x interconnector cables, and 30. 4 x offshore substation platforms (OSPs).	The Applicant notes NRW (A)'s comment.

Paragraph Reference	Written Submission Comment	Applicant's response
117	117. The export and interconnector cables would not impact on landscape or visual receptors within SDLs because they would typically be buried beneath the seabed, and at landfall in Llanddulas, the export cables would be buried from seaward of MLWS up to the onshore Transition Joint Bays (TJBs). The TJBs would be backfilled and reinstated once construction is completed.	
118	118. The four OSPs would be located within the Mona Array Area and have the potential to impact on landscape and visual receptors within SDLs. The main structure of the OSPs would have a maximum height of 70m above Lowest Astronomical Tide (LAT), a maximum length of 80m and maximum width of 60m. The maximum height of lightning protection and ancillary structures on the OSPs, e.g. helideck, is 90m above LAT. The OSPs would be subject to regular operations and maintenance visits.	
119	119. The OSPs are shown together with the wind turbines on the wirelines and photomontages (visualisations) prepared by the Applicant.	
120	120. Comments on the latest submission are as follows: 31. *S_NRWML_3 Applicant's Responses to NRW (A) Submission F01 13 November 2024*	
121	121. The Applicant's Response acknowledges our previous comments, and therefore we have no further comment. 32. *F2.8 Volume 2, Chapter 8: Seascape and visual resources (clean) F02, 22 January 2025* 33. *F2.8 Volume 2, Chapter 8: Seascape and visual resources (tracked) F01_F02, 22 January 2025* 34. *F6.8.4 Volume 6, Annex 8.4: Seascape, landscape and visual resources impact assessment methodology F02, 22 January 2025*	The Applicant notes and welcomes NRW (A)'s comment.
122	122. The above documents were submitted at Deadline 7 of the DCO application, in January 2025. The updates relate to errata identified during the DCO examination. The Applicant's corrections do not change our previous, separate, advice on the DCO application. 35. *S_D3_15 Seascape and Visual Resources Cumulative Wirelines F01, 13 November 2024*	The Applicant notes NRW (A)'s comment.

Paragraph Reference	Written Submission Comment	Applicant's response
123	123. We understand the cumulative wirelines are the same as those submitted at Deadline 3 of the DCO application. We commented on these in our Deadline 4 submissions [REP 4-105] and have nothing further to add.	The Applicant notes NRW (A)'s comment.
124	124. Regarding the Marine Licence Principles document, January 2025, we note the inclusion of a condition for the colour of infrastructure above any height directed by Trinity House to be coloured grey (RAL 7035) unless otherwise directed by the Licensing Authority (NRW). We are satisfied with the inclusion and wording of this condition, as proposed in the ML Principles Document January 2025.	The Applicant notes and welcomes NRW (A)'s comment.
125	**9 Materials and Waste** 125. NRW (A) notes that the final Site Waste Management Plan (J26.9) will be approved by the Local Planning Authority (LPA). We agree with this approach and consider that waste will be appropriately managed. NRW (A) should be consulted, in writing, on the final Site Waste Management Plan as part of the Code of Construction Practice (J26).	The Applicant notes and welcomes NRW (A)'s comment. It is the Applicant's intention to continue to consult with relevant SNCBs throughout the development of the final Site Waste Management Plan post-consent. The CoCP is managed through the DCO process and appropriate controls are in place there.

1.3 Applicant's Response to the Joint Nature Conservation Committee

Table 1.2: The Joint Nature Conservation Committee.

Paragraph Reference	Written Submission Comment	Applicant's response
1	**2 Overarching comments** There is a distinct gap in information between the Applicant's response to our comments (document title "S_NRWML_4_Mona_Responses to Other Consultees") and the Applicants final submissions provided into the Development Consent Order (DCO) process. In order for JNCC to provide current advice on this NRW Marine Licence (ML) application, we have referenced submissions and responses made during the DCO process. Unfortunately, the Applicant has not provided updated and clean copies of their original submissions and, without referencing the submissions from the DCO process, the information and details contained within those submissions would be lost.	Final versions of any documents updated through the DCO process were submitted to NRW MLT on 23 January 2025 after the close of the DCO examination and are available on the NRW public register by searching ORM2429T. These were listed in the updated Guide to the NRW Marine Licence Application (A2 F05) submitted on 23 January 2025. The information provided through the DCO Examination process and the standalone NRW Marine Licence process to date is, therefore, fully aligned.
2	**3 Marine ornithology comments** **3.1 Documents Reviewed** • Draft Record of a Habitats Regulations Assessment of a project. OGN 200 Form 1. March 2016. • F1 Mona Offshore Wind Project Environmental Statement. Non-Technical Summary (F02) January 2025. • J9 Mona Offshore Wind Project Marine Licence Principles document F05. December 2024. • J17 Mona Offshore Wind Project. Measures to minimise disturbance to marine mammals and rafting birds from transiting vessels (F03). December 2024.	The Applicant notes the JNCC's comment.
3	**3.2 Protected sites and features** Special Protected Areas (SPAs) potentially impacted by Mona OWF transmission assets for which JNCC has a responsibility: • Liverpool Bay/Bae Lerpwl SPA Features potentially impacted by Mona OWF transmission assets:	The Applicant notes the JNCC's comment.

Paragraph Reference	Written Submission Comment	Applicant's response
	• Non-breeding red-throated diver (RTD) • Non-breeding common scoter • Non-breeding assemblage of over 20,000 waterbirds	
4	**3.3 Relevant Conservation Objectives** **3.3.1 Non-breeding red-throated diver:** Subject to natural change, maintain or restore the red-throated diver population, distribution and its supporting habitats in favourable condition. • **Maintain** the size of the non-breeding population at a level which is at or above 1800 individuals (mean peak, 2015, 2018, 2019 & 2020). • **Restore** the distribution of the feature; preventing further deterioration, and where possible, reduce any existing anthropogenic influences impacting feature distribution. • **Minimise** the frequency, duration and/or intensity of disturbance affecting the feature so that the population, its distribution within the site, or its use of the habitat is not significantly affected. • **Maintain** the distribution, abundance and availability of key food and prey items (e.g. fish) to maintain the population. • **Restore** the extent, distribution and availability of suitable habitat which supports the feature; preventing further deterioration, and where possible, reduce any existing anthropogenic influences impacting the extent and quality (including water quality).	The Applicant notes the JNCC's comment.
5	**3.3.2 Common scoter:** Subject to natural change, maintain or restore the common scoter population, distribution and its supporting habitats in favourable condition. • **Maintain** the size of the non-breeding population at a level which is at or above 141,801 individuals (mean peak 2015, 2018, 2019 & 2020). • **Maintain** the distribution of the feature; the extent should not be reduced by anthropogenic factors. • **Minimise** the frequency, duration and/or intensity of disturbance affecting the feature so that the population, its distribution within the site, or its use of the habitat is not significantly affected.	The Applicant notes the JNCC's comment.

Paragraph Reference	Written Submission Comment	Applicant's response
	• **Maintain** the distribution, abundance and availability of key food and prey items (e.g. molluscs and bivalves) to maintain the population. • **Maintain** the extent, distribution and availability of suitable habitat which supports the feature; the quality and extent should not deteriorate by anthropogenic factors (including water quality).	
6	**3.3.3 Non-breeding assemblage of over 20,000 waterbirds:** Subject to natural change, maintain or restore the waterbird assemblage population, distribution and its supporting habitats in favourable condition. • **Maintain** the size of the non-breeding population of component species at a level which is at or above 157,952 individuals (mean peak 2015, 2018, 2019 & 2020). • **Maintain** the species diversity of the bird assemblage which should include common scoter, red-throated diver, little gull, red-breasted merganser and great cormorant. • **Maintain** the distribution of the feature; the extent should not be reduced by anthropogenic factors. • **Minimise** the frequency, duration and/or intensity of disturbance affecting the feature so that the population, its distribution within the site, or its use of the habitat is not significantly affected. • **Maintain** the extent, distribution and availability of suitable habitat which supports the feature; the quality and extent should not deteriorate by anthropogenic factors (including water quality).	The Applicant notes the JNCC's comment.
7	**3.4 Areas of concern** Both RTD and common scoter are sensitive to anthropogenic disturbance and displacement, including from vessel movements (Fliessbach *et al.*, 2019; Kaiser *et al.*, 2002), and therefore JNCC has had concerns over the impact on the non-breeding red-throated diver and common scoter features (and by extension the non-breeding assemblage feature) of the Liverpool Bay/Bae Lerpwl SPA from construction activities and vessel movements associated with the export cable corridor for the Mona OWF, expressed during the Examination of the DCO application. In our view, the potential impacts from the proposed works covered by this Marine Licence for the transmission assets for the Mona OWF are limited	The Applicant notes the JNCC's comment. The Applicant confirms that the impacts of disturbance and displacement from the presence of vessels have been assessed for red-throated diver and common scoter in the Mona Offshore Cable Corridor and Access Areas, which overlap with the Liverpool Bay/Bae Lerpwl SPA. The impact of disturbance and displacement from airborne noise, underwater sound, presence of vessels and infrastructure and pre-commencement activities such as UXO clearance on red-throated diver, common scoter and the non-breeding waterbird assemblage features were assessed as being of negligible significance in section 5.7.2 of Volume 2, Chapter 5: Offshore ornithology (F2.5 F04) and within the ISAA Part Three: SPAs and Ramsar sites Assessments (E1.3 F03).

Paragraph Reference	Written Submission Comment	Applicant's response
	to disturbance/displacement of the RTD, common scoter and waterbird assemblage non-breeding qualifying features of the Liverpool Bay/Bae Lerpwl SPA resulting from vessel activity and pre-commencement activities, such as Unexploded Ordnance (UXO) clearance, within the SPA.	The JNCC have agreed via further consultation that there will be no significant effects on ornithology receptors in EIA terms for the Mona Offshore Wind Project. The JNCC have also agreed via further consultation that there will be no AEoI on SPAs designated for offshore ornithology features for any impacts from the Mona Offshore Wind Project alone or in-combination with other projects and plans. The drafting of the standalone NRW Marine Licence is a matter for NRW MLT. However, the Applicant anticipates that a PEMP will be secured in the standalone NRW Marine Licence as identified in the Marine Licence Principles document (J9 F06), which is to include the Measures to Minimise Disturbance to Marine Mammals and Rafting Birds (J17 F03). As set out in that document, it is anticipated that a restriction on cable installation and UXO clearance from 1 November to 31 March within the Liverpool Bay/Bae Lerpwl SPA will therefore be secured in the standalone NRW Marine Licence as outlined in the Mitigation and Monitoring Schedule (J10 F07) and the Marine Licence Principles document (J9 F06).
8	This potential for impact is recognised in 1.6.3 (impacts from the Project alone) of the *E1.3. Mona HRA Stage 2 ISAA Part 3*: *1.6.3.4 There is potential for temporary, direct habitat loss/disturbance as a result of site preparation activities in advance of construction activities, cable installation activities (including Unexploded Ordnance (UXO) detonation), pre-cabling seabed clearance, anchor placements and decommissioning activities such as export cable removal.* *1.6.3.7 The assessment of LSE during the HRA screening process identified that during construction and decommissioning, LSE could not be ruled out for the potential impact of temporary habitat loss/disturbance and increased SSC within Liverpool Bay/Bae Lerpwl SPA, only. Considering the baseline conditions of the Liverpool Bay/Bae Lerpwl SPA, only certain qualifying features are present in densities where an impact could affect the conservation objectives (see section 1.6.2). This relates to the following relevant offshore ornithological features:* • *Red-throated diver* • *Common scoter; and* • *Waterbird assemblage (red-breasted merganser and great cormorant in addition to species listed above).*	
9	And in 1.6.4 (impacts from the Project in-combination with other Plans or Projects) where it is stated in Table 1.66 for the assessment against the Distribution Conservation Objective Target: *Displacement and disturbance associated with the in-combination plans and projects on red-throated diver is expected to occur as a result of vessels movements.* *Due to the temporary nature over which the birds would be impacted (as a vessels transits through the SPA), it is not predicted that a permanent disturbance would occur and therefore this impact would not affect the ability for the distribution to be restored.*	

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	However with the levels of vessels continuing to increase their will get to a limit whereby the distribution of birds would avoid the navigation channels. Red-throated diver already exhibited this behaviour when the SPA was designated (Figure 1.4) and therefore it would be considered part of the baseline distribution. *Therefore, disturbance and displacement from airborne sound and presence of vessels and infrastructure during all phases will not prevent the distribution of the qualifying feature from being restored.*	
10	It should be noted that the export cable corridor does not follow existing shipping routes through the SPA (Figure 1.1, F*1 Mona Environmental Statement Non-Technical Summary*) and traverses an area of higher red-throated diver and common scoter density (Figures 1.4 and 1.8, *E1.3. Mona HRA Stage 2 ISAA Part 3*, respectively). Additionally, as the port location is currently unknown, there is the possibility that UXO clearance vessels and cable installation vessels travelling to reach the export cable corridor area and/or array area located outside of the SPA, and vessels transiting from port to the array area, could travel through the SPA to reach these areas. JNCC did not therefore agree that without further mitigation measures, a conclusion of no Adverse Effect on Integrity could be reached. JNCC along with NRW Advisory held discussions with the Applicant during the Examination period to resolve those issues (Table 1.1 of *J17 Mona Offshore Wind Project Measures to minimise disturbance to marine mammals and rafting birds from transiting vessels* sets out a timeline of those discussions), reflected in our evolving advice to the DCO Examination. For example: In our Deadline 4 submissions (REP4-099, REP4-103), we stated that we were satisfied the mitigation measures including a seasonal restriction on export cable installation within the Liverpool Bay/Bae Lerpwl SPA during the period 1 November to 31 March to minimise impact on red-throated diver and common scoter, but highlighted our concerns that the seasonal restriction did not apply to pre-commencement activities including UXO clearance. In our Deadline 5 submissions (REP5-095, REP5-097), we again raised UXO clearance being permissible within the SPA during the sensitive period being an issue of concern.	The restriction on export cable installation activities and UXO clearance from 1 November to 31 March within the Liverpool Bay/Bae Lerpwl SPA was committed to by the Applicant to address specific concerns raised by the JNCC and NRW (A) on the impacts of UXO relating to red-throated diver and common scoter. JNCC have agreed through further consultation with the application of the seasonal restriction to works within the SPA to both export cable installation activities and UXO clearance and the other measures contained within the Measures to Minimise Disturbance to Marine Mammals and Rafting Birds (J17 F03). JNCC also agreed through further consultation that there would be no AEoI of the non-breeding red-throated diver and common scoter qualifying features of the Liverpool Bay/Bae Lerpwl SPA, either from the Mona Offshore Wind Project alone or in-combination with other plans and projects. The Applicant welcomes this conclusion.

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11	However, following discussions with the Applicant, by Deadline 6 (REP6-135), we were in a position to conclude no Adverse Effect on Site Integrity for either feature: *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 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.*	
12	**3.5 Advice on Adverse Effect on Site Integrity** **3.5.1 Liverpool Bay/Bae Lerpwl SPA** In our previous advice (letter dated 19 August 2024), we raised concerns over: • Clarity of the *Measures to minimise disturbance to marine mammals and rafting birds* document • Impact of activities at the landfall • Security of mitigation measures within the Marine Licence	The drafting of the standalone NRW Marine Licence is a matter for NRW MLT. However, the Applicant anticipates that a PEMP will be secured in the standalone NRW Marine Licence as identified in the Marine Licence Principles document (J9 F06), which is to include the Measures to Minimise Disturbance to Marine Mammals and Rafting Birds (J17 F03). As set out in that document it is anticipated that a restriction on cable installation and UXO clearance from 1 November to 31 March within the Liverpool Bay/Bae Lerpwl SPA will therefore be secured as outlined in the Mitigation and Monitoring Schedule (J10 F07) and the Marine Licence Principles document (J9 F06).

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	We note and welcome the Applicant's commitment to a seasonal restriction on cable installation and low order UXO clearance (*J17 Mona Offshore Wind Project Measures to minimise disturbance to marine mammals and rafting birds from transiting vessels* 1.3.1.1-1.3.1.3), with any high order UXO clearance requiring a separate Marine Licence. We agree with the Applicant that these measures should be secured through the standalone NRW Marine Licence.	
13	We note that the draft Habitats Regulations Assessment (HRA) does not currently consider the impact of UXO clearance and other pre-commencement activities as a pathway to disturbance of *Liverpool Bay/Bae Lerpwl SPA* features. As highlighted above, this was a key consideration within the DCO Examination and we advise that the draft HRA is amended accordingly. We further note and agree with the statement in the draft HRA (4.2, page 136) in relation to the relevant features of the *Liverpool Bay/Bae Lerpwl SPA:* *The Offshore EMP will include a timing restriction of no offshore export cable installation or low order UXO clearance activities during the period 1 November to 31 March within the Liverpool Bay/Bae Lerpwl SPA to minimise disturbance to rafting birds, specifically common scoter and red-throated diver as features of the SPA (Document Reference J17). This restriction is applicable to cable installation vessels undertaking active cable installation within the Liverpool Bay/Bae Lerpwl SPA only. This measure will apply to the Mona Offshore Cable Corridor, between the offshore extent of the Liverpool Bay/Bae Lerpwl SPA and the entry/exit location of the trenchless technique installation works at the landfall, within the nearshore waters of the Liverpool Bay/Bae Lerpwl SPA.* *The Offshore EMP can be secured within the marine licence.* As a conclusion of no Adverse Effect on Site Integrity relies on the mitigation measures proposed being secured, we recommend that the last sentence is amended to read *must* rather than *can*.	The Applicant notes the JNCC's comment. These activities have been assessed under the pathway titled 'Disturbance and displacement from airborne sound and presence of vessels and infrastructure during construction, operation and maintenance and decommissioning phases' in section 5.7.2 of Volume 2, Chapter 5: Offshore ornithology (F2.5 F04) and within the ISAA Part Three: SPAs and Ramsar sites Assessments (E1.3 F03). The Applicant has committed to the seasonal restriction on cable installation and UXO clearance from 1 November to 31 March within the Liverpool Bay/Bae Lerpwl SPA as set out in the Mitigation and Monitoring Schedule (J10 F07) and the Marine Licence Principles document (J9 F06). The Mitigation and Monitoring Schedule (J10 F07) and the Marine Licence Principles document (J9 F06) demonstrate that the Applicant anticipates this commitment will be secured within the standalone NRW Marine Licence. The Applicant notes NRW (A)'s comment and that this is in response to NRW MLT's draft Habitats Regulations Assessment (HRA). The drafting of the standalone NRW Marine Licence is a matter for NRW MLT. However, it is the Applicant's anticipation that a PEMP will be secured in the standalone NRW Marine Licence as identified in the Marine Licence Principles document (J9 F06), which is to include the Measures to Minimise Disturbance to Marine Mammals and Rafting Birds (J17 F03).
14	The final version of the DCO submitted at Deadline 7 contained condition 18(e) vi requiring an Offshore Environment Management Plan to include the details of the *Measures to minimise disturbance to marine mammals and rafting birds from transiting vessels*, thereby securing these mitigation measures, and recommend that the standalone NRW Marine Licence	

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	contains a similar condition (the relevant Statutory Nature Conversation Body being both NRW (Advisory) and JNCC). Subject to the securing of the measures outlined in *J17 Mona Offshore Wind Project Measures to minimise disturbance to marine mammals and rafting birds from transiting vessels* within the standalone NRW Marine Licence, JNCC would be in a position to consider our previous concerns resolved and be able to conclude no Adverse Effect on Site Integrity of the Liverpool Bay/Bae Lerpwl SPA.	
15	**3.5.2 Skomer, Skokholm and Seas of Pembrokeshire SPA, Irish Sea front SPA** JNCC does not consider there to be an Adverse Effect on Site Integrity of other SPAs for which we have responsibility for, in particular the Skomer, Skokholm and Seas of Pembrokeshire SPA or Irish Sea Front SPA.	The Applicant notes and welcomes the JNCC's comment.
16	**4 Marine mammal comments** **4.1 Overall comments** The following documents were reviewed in providing this response: HRA: • Stage 1 Screening Report • Stage 2 Information to support an Appropriate Assessment – Part 1, Introduction and background. – Part 2, Special Areas of Conservation (SAC) assessments. Environmental Statement (ES): • Volume 2, Chapter 4: Marine mammals. • Volume 2, Chapter 11: Inter-related effects – Offshore. • Volume 5, Annex 5.1: Cumulative effects screening matrix. • Volume 8, Annex 2.2: Climate change risk assessment. Offshore plans: • Other Consents and Licences Required • Mitigation and Monitoring Schedule	The Applicant notes the JNCC's comment.

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	• Outline Underwater Sound Management Strategy • Outline Marine Mammal Mitigation Protocol • UXO clearance position statement <u>Other documents:</u> • Mona Response Letter • Mona Responses to NRW MLT • Mona Responses to NRW (A) • Mona Responses to Other Consultees • Mona Errata Sheet • Mona Further Information Cover Letter. JNCC previously provided comments on the Transmission Assets of the Mona OWF in August 2024. Therefore, our comments here shall be limited to new information provided. Since providing our previous advice on the transmission assets, some discussions of relevance to this response have continued as part of the Development Consent Order (DCO) process for this development. The discussions relating to impact piling and unexploded ordnance (UXO) clearance, continue to be relevant here.	
17	**4.2 Impact piling** Discussions regarding the inclusion of quieter piling installation methods and/or noise abatement systems in the projects outline underwater sound management strategy (oUWSMS, J16 F02) and outline marine mammal mitigation plan (oMMMP, J21)) continued through the DCO Examination process for this development. The assumed maximum hammer energies (of 4,400kJ and 3,000kJ) that were modelled in the Environmental Statement for the piling (F2.4 F02, Chapter 4, Table 4.23 and 4.24) resulted in potential injury ranges within those that can be mitigated by marine mammal observers (MMOs) using the standard Statutory nature conservation agency protocol for minimising the risk of injury to marine mammals from piling noise. The exception to this was for low frequency cetaceans, e.g. minke whales. For this hearing group, injury ranges of between 4.2km and 7.5km were predicted. While it	The Applicant notes and welcomes the JNCC's statement that they are content with the outline plans provided. The drafting of the standalone NRW Marine Licence is a matter for NRW MLT. However, it is the Applicant's expectation that an MMMP and an UWSMS in line with the outline MMMP (J21 F03) and outline UWSMS (J16 F03) will be secured in the standalone NRW Marine Licence, as identified in the Marine Licence Principles document (J9 F06). It is the Applicant's intention to continue to consult with relevant SNCBs throughout the development of the UWSMS post-consent. It will then be for NRW MLT to consult the appropriate SNCBs for their approval on the final UWSMS. The outline MMMP (J21 F03) sets out the Applicant's commitment to proportionate and judicial application of Acoustic Deterrent Devices (ADDs) to balance the risk of injury with any potential disturbance from the ADD itself. The final UWSMS will consider a range of mitigation options for piling including NAS technologies where necessary. The inclusion of NAS in the outline UWSMS

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	is possible to mitigate these kinds of injury ranges using a combination of visual observers, acoustic monitoring, and acoustic deterrents, the duration over which an acoustic deterrent would need to be activated could be great. There is a need to balance introducing additional noise into the marine environment with potential reduction in injury risk. In addition, the effectiveness of Acoustic Deterrent Devices (ADDs) in deterring low frequency cetaceans is limited, and may not do so to the distances predicted within the assessment (JNCC, 2025). As a result, JNCC required noise abatement measures to be considered within the outline Marine Mammal Mitigation Plan (oMMMP, J21) and the outline Underwater Sound Management Strategy (oUWSMS, J16 F02). After some discussion as to how noise abatement were considered within these documents, JNCC were content the documents presented to the Examining Authority were appropriate and could be finalised post-consent (should it be awarded). The updates provided for this Marine Licence application reflect the final versions provided to the Examining Authority, subsequently we are content with the outline plans provided. JNCC's agreement is, however, conditional of measures being secured within the NRW Marine Licence and the final documents being approved by the licensing authority through consultation with the appropriate Statutory Nature Conservation Bodies ((SNCBs) in this case, JNCC and NRW (A)) ahead of any piling occurring.	(J16 F03) demonstrates the Applicant's commitment to using NAS if it is identified to be the most appropriate option.
18	Since the submission of our advice to the Examining Authority for this development, Defra has published a Noise Policy Paper for offshore wind. This includes a requirement that from January 2025 onwards, all offshore wind pile driving in English waters will have to utilise best endeavours to deliver noise reductions through the use of primary and/or secondary noise reduction methods in the first instance. While this development is in Welsh waters, the noise policy paper highlights the importance of reducing noise in the marine environment. Subsequently we recommend a similar approach is considered for Welsh waters. We highlight also that as the purpose of deploying acoustic deterrents for mitigation is to deliberately disturb, a European Protected Species (EPS) licence to disturb would be required. Such a licence may also be required to cover disturbance from piling. While this licence would not be applied for until after the design envelope is refined, we highlight that additional information will be required to support this application above that provided for this Marine Licence application. In particular, the application will be	The Applicant notes the JNCC's comment and reiterates that NAS will be considered as part of the development of the final UWSMS (as detailed in Volume 2, Chapter 4: Marine mammals (F2.4)), demonstrating the Mona Offshore Wind Project's commitment to using best endeavours to deliver noise reductions on developments with any mitigation tailored to the final design. Post-consent, on the basis of the final project design envelope and programme clarity, the final UWSMS will investigate options, if necessary (such as NAS, temporal and spatial piling restrictions, piling methods, soft start) in order to reduce the magnitude for the Mona Offshore Wind Project alone relating to underwater sound impacts, in order to minimise the Mona Offshore Wind Project's contribution to any cumulative effect. The final UWSMS will be developed in consultation with the licensing authority and SNCBs in accordance with the latest guidance (Defra, 2025; Defra *et al*., 2025), and agreed, prior to construction, those mitigation measures which may be implemented to reduce the magnitude of impact from the Mona Offshore Wind Project alone, and the contribution from the Mona Offshore Wind Project to any cumulative effects. The

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	required to demonstrate there are no satisfactory alternatives, which will need to include consideration of alternative mitigation measures. JNCC, in conjunction with Natural England and Cefas, released a joint position statement on the use of quieter piling methods and noise abatement systems (NAS). JNCC would expect any application to include consideration of noise abatement and/or quieter installation methods in order to reduce the number of animals that could be disturbed (Environmental Statement, F2.4 F02, Chapter 4, Table 4.28). The SNCB statement specifies that, "*Should applicants argue against using [NAS], they must provide strong/robust justifications with supporting evidence.*"	Applicant highlights JNCC's response in Row 24 which confirms the Applicant's commitment to prioritising low noise methods of clearance is compliant with the Governments Joint Position statement on UXO clearance. The Applicant notes JNCC's comments on application for a European Protected Species (EPS) licence, noting it is under a separate licencing regime, and will be considered at the time of application for the EPS licence. The Applicant is not aware of any reason why such a licence would not be granted, if required.
19	**4.3 UXO clearance** The issue of UXO clearance has also been discussed to a considerable extent throughout the DCO Examination period for this development. The maximum size of UXO (based on volume of explosive content) is assumed in the Environmental Statement (F2.4 F02) to be 907kg. Although it was claimed the most likely size to be found will be 130kg, that is not known at this stage so the worst-case scenario must be considered. The assessment considered both high order and low order clearance methods although we note the Applicant has since removed high order clearance from the DCO and is not requesting it for this Marine Licence application. However, the Applicant still requests that low order clearance of UXOs is included in this Marine Licence application. JNCC maintained their position when responding to the Examining Authority that UXO clearance is not included in the projects DCO/dML due to the lack of information available at this time, and we maintain this position for the current NRW Marine Licence application.	The Applicant acknowledges the JNCC's continued preference that no UXO clearance activity is included in the Mona Offshore Wind Project DCO or marine licences. The Applicant highlights that during further consultation, the JNCC stated that 'they would be supportive of Option 2 (restriction to low order clearance only) if in addition to the commitment that all UXO clearance is restricted to low order methods only, that it is also clearly stated should high order be required it will be subject to a separate marine licence application". High order UXO detonation will not be authorised under the DCO and has not been applied for under the standalone NRW Marine Licence (as set out in commitment 111 in the Mitigation and Monitoring Schedule (J10 F07)). The Maximum Design Scenario (MDS) at the time of writing Volume 2, Chapter 4: Marine Mammals (F2.4 F02) was based upon conservative estimates of high order detonation (i.e. absolute maximum assumed to be 907 kg and the most likely (common) size is 130 kg). Both were included in the assessment to ensure consideration of the absolute worst case but also to provide context for a more realistic scenario. Mitigation was subsequently developed on the basis of the absolute maximum scenario. As noted by JNCC, however, high order detonation has since been removed from the Mona Offshore Wind Project DCO and standalone NRW marine licence. The Applicant highlights that the size of the UXO is immaterial to low order clearance as it is the size of the donor charge only that predicts the magnitude of the impact (Ocean Winds, 2024). The Applicant will develop the final MMMP post-consent and will follow the latest guidance, including the JNCC guidelines on reducing the risk of injury to marine mammals from UXO clearance (JNCC, 2025), and the Joint Position Statement (Defra *et al.,* 2025) with supporting Defra UXO guidance (Defra, 2025).

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20	Reasons to support this position can be found in REP5-096. Of the two low order methods considered in the Environmental Statement, we focussed our review and subsequent comments on the deflagration method as there is no evidence currently to support claims low yield methods are effective (for example, see Alford *et al.*, 2022). We also note that the noise modelling assumed a 0.08kg (80g) deflagration donor charge when predicting injury ranges for marine mammals. This is lower than used at the Moray West OWF in their recent clearance campaign (Ocean Wind, 2024), where the donor charge weight was either 150g or 250g, depending on the device being cleared. During this campaign, 83 devices of six different types were all successfully cleared using the Alford deflagration tool. Based on our experience of reviewing low order deflagration clearance activities for this and other developments, we are concerned the impact assessment described in the Underwater Sound Technical Report (APP-079, which unpins the assessment in the Environmental Statement) and Chapter 4 of the Environmental Statement (F2.4 F02) does not realistically represent the worst-case scenario and there were no provisions in the draft DCO submitted to the Examining Authority to ensure operations remain within the assessed parameters (see below for further comment). This further supported our request that UXO clearance is not included in the DCO/dML due to the lack of information available at this time.	The Applicant confirms that two low order UXO clearance methods, including low order deflagration and low yield methods, were considered as part of the impact assessment for UXO clearance in Volume 2, Chapter 4: Marine Mammals (F2.4 F02). Deflagration involves the use of a small, cone-shaped plasma donor charge to generate sufficient pressure to burst the UXO casing and 'burn out' the main filling, thereby neutralising the explosive material. Low yield methods use a water pressure jet technique to rupture the casing and disrupt and disintegrate the combustible material inside the UXO, although a donor (or shaped) charge is still required to initiate the water jet. The Applicant notes the JNCC's view on low-yield methods, which has been informed by the Alford et al. (2022) study and is detailed in JNCC (2025). The Applicant is aware that the efficacy of low order deflagration, as demonstrated by controlled testing (Robinson, 2020) and successful at-sea commercial UXO clearances (Ocean Winds, 2024), is currently better established than for low yield methods. Although it is understood that the low yield method has not been successfully applied in a commercial UXO clearance campaign, it is a technology that is being investigated and will potentially become available. The Applicant notes that the recently published UXO Clearance Joint Position Statement (Defra *et al.,* 2025) does not explicitly refer to deflagration (or any specific low order method) but instead refers to 'low noise methods' as the default approach for UXO clearance. This indicates a degree of flexibility in the particular low order method that can be proposed in a licence application and is reinforced by the hierarchy of preference set out in the Joint Position Statement and Defra's supporting guidance (Defra, 2025). Whilst the hierarchy favours low order techniques with proven reliability in the field, it does not preclude the proposal of more novel techniques, provided that controlled tests have been undertaken (to give confidence in the level of noise reduction predicted) and appropriate mitigation measures and monitoring are proposed. The Applicant is aware that Defra is supporting a final phase of controlled trials of suitable novel clearance tools carried out in 2024 to support its policy on UXO clearance methodologies. It is therefore considered entirely appropriate to include low yield in the assessment of low order UXO clearance for the Mona Offshore Wind Project in order to future-proof the Application with respect to evolving technologies (should low yield be demonstrated to be effective within timescales relevant to the Mona Offshore Wind Project). This approach is considered to be in line with the UXO Clearance Joint Position Statement and supporting guidance (Defra, 2025; JNCC, 2025) published on 21 January 2025. The Applicant will

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		adhere to the requirements of the UXO Joint Position Statement and supporting guidance in developing the final MMMP and UXO clearance method statement post-consent in consultation with the licensing authority and relevant statutory consultees, as is expected to be secured in the standalone NRW Marine Licence. In order to assess low order UXO clearance, including deflagration and low yield methods, noise modelling was undertaken for donor charge sizes ranging from 0.08 kg (80 g) to 3 kg (3,000 g) (4 x 0.75 kg) (as set out in Table 4.16 of Volume 2, Chapter 4: Marine Mammals (F2.4 F02)). This included a small 0.5 kg (500 g) charge, which was modelled and assessed should a 'clearing shot' be required to neutralise any unstable material within the residual explosive material that cannot be safely recovered or left in situ. This clearing shot has also been modelled and assessed to capture all potential activities associated with low order UXO clearance. The modelling methods (see detail below) for calculating potential impact (i.e. Permanent Threshold Shift) ranges are the same irrespective of the low order technology being applied (deflagration, low yield and clearance activities); the only difference is the size of the charge. In this respect, it is immaterial what the technique is called (low order, deflagration, low yield, or a clearing shot) as it is only the charge size that determines the predicted magnitude of impact. The range of donor charges considered in the Application for low order UXO clearance encompass those used in the Moray West Offshore Windfarm UXO clearance campaign (150 g or 250 g) and was determined based on a review of literature as well as the professional judgment and experience of technical specialists. The impact assessment of UXO clearance was based upon precautionary robust sound modelling following the methodology described in Soloway and Dahl (2014) (see Volume 5, Annex 3.1: Underwater sound technical report of the Environmental Statement (F5.3.1)). The MDS at the time of writing Volume 2, Chapter 4: Marine Mammals (F2.4 F02) was based upon conservative estimates of high order detonation (i.e. absolute maximum assumed to be 907 kg and the most likely (common) size is 130 kg) and a high-order donor charge size of 1.2 kg (most common) and 3.5 kg (single barracuda blast charge). This determined the details of the mitigation strategy as set out in the Outline MMMP (J21 F03) and Outline UWSMS (J16 F03). The Applicant has demonstrated that when considering high-order clearance as a worst-case scenario, the predicted effects can be fully mitigated through measures detailed in the Outline MMMP (J21 F03) and UWSMS (J16 F03). As such, the Applicant does not consider it necessary to

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		provide specific parameters for low order clearance, as this falls within the worst-case assessed. For clarity, the Applicant has updated the Outline MMMP (J21 F03) to remove reference to high order clearance in order to provide greater certainty with respect to the design envelope for low order UXO clearance and the associated mitigation measures to be secured through the MMMP and expected to be secured via the standalone NRW Marine Licence. The Applicant reiterates that it has committed to using low order UXO clearance only through the DCO. As outlined in the Marine Licence Principles document (J9 F06), this commitment is also expected to be secured in the standalone NRW Marine Licence. Should there be a requirement to undertake UXO clearance using high-order methods, the Applicant will apply for a separate marine licence to cover this activity.
21	If low order clearance was to be a licenced activity in the NRW Marine Licence currently being applied for, and noting the issues we have raised with regard to available information, additional measures would need securing within the consent. The following reflects the same advice we provided to the Examination Authority. As a minimum, any Marine Licence awarded must include: • All references to low order amended to state low order deflagration, as this is the specific low order method that has been assessed in the ES. • A maximum number of UXOs to be cleared must be stated i.e. 22. (to reflect the scenario presented in the ES). • A maximum volume of explosive material to be contained within the donor charge must be stated i.e. 80g (to reflect the scenario presented in the ES). • A requirement for two separate plans to be agreed and approved with the regulatory authority and SNCBs ahead of clearance activities commencing. The first would be a general method statement, as referred to in the draft DCO. In addition, a separate clearance plan would also be required, to be submitted once investigative surveys to identify confirmed UXOs have been completed. The draft DCO referred to potential UXO, not confirmed UXO, meaning any method statement required could be submitted ahead of the investigative surveys being completed. This would not provide any additional information regarding what is to be cleared than is currently within the ES.	The Applicant has responded to each of the specific points raised by the JNCC below. **Assessment of low order clearance in the Environmental Statement** As per the Applicant's response in Row 20 above, the Applicant disagrees that all references to low order UXO should be amended to refer to 'low order deflagration' as this is not the only low noise method assessed within the Environmental Statement, low yield methods were also considered (as set out in Volume 2, Chapter 4: Marine mammals (F2.4 F02)). Both deflagration and low yield methods require use of a donor charge to initiate low order clearance of UXOs. In circumstances where it is suspected that there may be unstable material within the residual explosive material that cannot be safely recovered or left in situ, detonation of a small (500 g) charge as a 'clearing shot' may be required to neutralise this before safe recovery can proceed. The Applicant emphasises that it is immaterial what the low order clearance method is called or the process by which it seeks to neutralise a UXO or residual explosive material as it is the size of the donor charge alone that determines the predicted magnitude of impact. Furthermore, the modelling approach is the same irrespective of the size of the donor charge. As low order was the preferred method of clearance in the Application, a range of donor charge sizes applicable to several low order clearance methods, including deflagration and low yield, were considered. The donor charge sizes range from

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	– The clearance plan will need to include, as a minimum, a map with the location of all UXOs to be cleared, and for each device, information on the type of UXO and its physical state (i.e. how degraded the casing may be, presence/coverage of marine growth etc), the degree of burial, and the method proposed to be cleared i.e. confirm deflagration will be attempted. Note, if it is felt high order clearance is required, the additional marine licence application will need to consider impacts to noise as it will result in a crater. The clearance methodology will need to provide details of the exact tool to be used, not a vague reference to undertaking deflagration. As a minimum this must include the volume of explosive material to be contained, and evidence to support the use of that tool e.g. evidence of its effectiveness, how it will be deployed, and post-clearance surveys to remove debris.	0.08 (80g) kg to 3 kg (3,000g) (4 x 0.75 kg) and encompassed a 0.5 kg (500 g) clearance shot should this be required (as set out in Table 4.16 of Volume 2, Chapter 4: Marine Mammals (F2.4 F02)). These values were carried through to the marine mammal impact assessment under the impact 'Injury and disturbance from underwater UXO detonation'. Thus, the assessment in Volume 2, Chapter 4: Marine mammals (F2.4 F02) was not limited to low order deflagration only, as it considered a range of donor charge sizes applicable to several low order clearance methods, including deflagration and low yield. The Applicant considers that a sufficiently robust MDS, representing a realistic worst case in terms of the donor charge size that could be required to undertake low order clearance (whether this be by deflagration or low yield methods), has been assessed in the Application. The updated UXO Clearance Joint Position Statement (Defra et al., 2025) published on 21 January 2025 recognises that "*methods available to clear UXOs are evolving, as is the available evidence supporting claims of their reduced environmental impact*". Furthermore, it highlights that work is ongoing by Defra to develop the evidence base to demonstrate the efficacy of low noise methods. Given that this information could become available within the relevant timescales for the Mona Offshore Wind Project, the Applicant believes it entirely appropriate and necessary to retain flexibility in the low noise method that could be used under the standalone NRW Marine Licence. The low order clearance method (i.e. tool) and donor charge sizes to be employed would be determined post-consent following UXO investigations (i.e. UXO surveys and ground-truthing) and details included within the method statement for low order UXO clearance. This information will also inform the finalisation of the MMMP and UWSMS. The method statement and final MMMP would be submitted to the licensing authority for approval in consultation with the relevant statutory advisers. **Including MDS parameters for low order UXO clearance within the Marine Licence** Whilst the Applicant appreciates that the drafting of the standalone NRW Marine Licence is a matter for NRW MLT, the Applicant does not consider it necessary to include a requirement specifying the maximum number of UXOs that can be cleared or the maximum volume of explosive material that can be contained within the donor charge authorised under the marine licences. Furthermore, it is highlighted that no comparable requirements for piling (which limit, for example,
22	Including the limitations referred to above regarding what is to be cleared, and the size of donor charge mirroring the scenario assessed in the Environmental Statement, would align conditions within the marine licence with those typically included for piling, which can include, for example, specifying maximum hammer energy values. The above measures will need to be secured in the NRW Marine Licence, in addition to being referred to in the oUWSMS (J16 F02) and oMMMP (J21).	
23	While our preference is that UXO clearance is not contained within the NRW Marine Licence, we do agree that surveys to identify and investigate potential unexploded targets can be included. This would enable this activity to be completed ahead of submitting any required marine licence application for clearance, which would ensure accurate information can be provided.	

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		hammer energy values) are included in the DCO or expected to be included in the standalone NRW Marine Licence, as suggested by the JNCC. Notwithstanding this, the Applicant is aware that the Morgan Offshore Wind Project: Generation Assets Project included a condition in its dMLs within the Draft DCO for Deadline 3 limiting the total number of low order UXO clearances that are authorised. In light of this, the Applicant would be willing to accept a condition limiting the number of low order UXO clearances that could be cleared under the Mona DCO and standalone NRW Marine Licence to a maximum of 22. For clarity, the Applicant proposes that Condition 21 of Schedule 14 of the Draft DCO be updated to include the following wording highlighted red. *Low order unexploded ordnance clearance* *21.—(1) No low order unexploded ordnance clearance can begin until for those activities the following have been submitted to and approved in writing by the licensing authority in consultation with the statutory nature conservation body and, in respect of the method statement, the MCA—* *(a) a method statement for low order unexploded ordnance clearance which must include—* *(i) methodologies for—* *(aa) identification and investigation of potential unexploded ordnance targets;* *(bb) low order unexploded ordnance clearance;* *(cc) removal and disposal of large debris;* *(ii) a plan showing the area in which clearance activities are proposed to take place;* *(iii) confirmation of the total number of low order unexploded ordnance to be cleared under this licence;* *(iv) a programme of works; and* *(v) any exclusion zones and/or environmental micrositing requirements;* *(b) a specific offshore written scheme of investigation and protocol for archaeological discoveries (which must accord with the details set out in the*

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		outline offshore written scheme of investigation and protocol for archaeological discoveries); and *(c) a marine mammal mitigation protocol in accordance with the outline marine mammal mitigation protocol, the intention of which is to prevent injury to marine mammals, following current best practice as advised by the statutory nature conservation body.* *(2) The method statement and the marine mammal mitigation protocol must be submitted to the licensing authority for approval at least four months prior to the date on which unexploded ordnance clearance activities are intended to begin.* *(3) The licencing authority must determine an application for approval made under this condition within a period of four months commencing on the date the application is received by the licencing authority, unless otherwise agreed in writing with the undertaker.* *(4) Any unexploded ordnance clearance activities must be undertaken in accordance with the method statement and marine mammal mitigation protocol approved under sub-paragraph (1).* *(5) Subject to sub-paragraph (6), an unexploded ordnance close-out report must be submitted to the licensing authority and the statutory nature conservation body within three months following the end of the unexploded ordnance clearance activity and must include the following for each clearance undertaken—* *(a) co-ordinates, depth, current speed, charge utilised and the date and time of each clearance;* *(b) whether any mitigation was deployed including feedback on practicalities of deployment of equipment and efficacy of the mitigation where reasonably practicable, or justification if this information is not available.*

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		(6) Should there be more than one unexploded ordnance clearance activity, the report required under paragraph (5) will be provided at intervals agreed with the licensing authority. *(7) The total number of low order unexploded ordnance clearance as part of the authorised scheme in this licence must not exceed 22.* *(8) No high order unexploded ordnance clearance is permitted by this marine licence.* It should be noted that '22' represents the maximum number of UXOs to be cleared within the Mona Array Area, Mona Offshore Cable Corridor, and Access Areas and is, therefore, applicable to both the DCO/dML and standalone NRW Marine Licence. At this stage, it is not known what proportion of this total number could require clearance under either licence. The Applicant, therefore, expects the standalone NRW Marine Licence to secure the same maximum number of UXOs (i.e. 22). NRW will be responsible for regulating the total number of UXOs to be cleared, ensuring that the overall total of 22 is not exceeded across the two licences. If adopted within the made Order, the proposed updates to the Draft DCO outlined above would facilitate this by requiring prior notification to NRW of the number of UXOs to be cleared under the dML. A similar condition is expected to be secured within the standalone NRW ML, enabling the overall maximum to be managed. This approach is consistent with the drafting of Schedule 14, Part 2, Condition 18(1)(a)(ii) of the dML within the draft DCO (agreed with NRW MLT) relating to the Offshore Substation Platforms which will also be authorised by both the dML and NRW ML. As previously highlighted, deflagration is not the only low order clearance method that has been considered in the Application; low yield methods have also been assessed. The MDS for low order clearance covers donor charge sizes ranging from 0.08 (80g) kg to 3 kg (3,000g). The Applicant notes that for the Moray West Offshore Wind Farm low order UXO clearance campaign (Ocean Winds, 2024), the donor charge size was increased from 150 g to 250 g, where multiple clearance attempts failed. Some UXOs required more than a single deflagration attempt (e.g. 53 of 82 UXOs (65%) were successfully neutralised following a single deflagration attempt, with 45% requiring more than one attempt (Ocean Winds, 2024)). This demonstrates the importance of maintaining flexibility in the

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		donor charge weights to allow multiple attempts at low order UXO clearance and maximise the chances of success. The UXO clearance Joint Position Statement (Defra et al., 2025) stipulates that a minimum of three attempts should be made to clear a UXO using low noise (i.e. low order) methods and that all best practice must be demonstrably applied before high order clearance methods can be used as a contingency (where there is prior agreement with the appropriate licensing authority). Thus, to meet these conditions, the Applicant requires flexibility in the donor charge weights in order to undertake multiple clearance attempts (if necessary) and demonstrate that reasonable effort has been made to clear UXOs using low noise methods in accordance with policy and best practice guidance. Consequently, the Applicant disagrees with the JNCC that a maximum volume of explosive material to be contained within the donor charge should be stated within the standalone NRW Marine Licence. Furthermore, it is emphasised that flexibility to apply the full range of donor charge sizes assessed in the Application is necessary to facilitate multiple attempts at low order UXO clearance, if required. **Preparation of a separate clearance plan in addition to the method statement** The Applicant does not consider a 'clearance plan' necessary in addition to the method statement for UXO clearance which is expected to be secured in the standalone NRW Marine Licence, as set out in the Marine Licence Principles document (J9 F06). The investigation and clearance of UXOs is a sequential process; the information gathered from one stage is required to inform the scope of the next. There are four key steps: 1. Geophysical survey to identify potential UXOs (pUXO); 2. Investigation of pUXOs to identify confirmed UXO (cUXO) – this will likely be either a more detailed geophysical survey or undertaken via remotely operated vehicle (ROV); 3. Clearance of cUXO; and 4. Removal and disposal of large debris. The method statement for UXO clearance is intended to cover all necessary steps of the process outlined above (noting that geophysical surveys are not a licensable activity under the Marine and Coastal Access Act 2009). The drafting of the DCO dML set out in the Marine Licence Principles document (J9 F06)

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		anticipates that multiple methodologies relevant to each stage of the UXO investigation and clearance process will be required and does not preclude the methodologies from forming separate method statements (as required) to be submitted to the licensing authority in consultation with the statutory nature conservation body at the appropriate time. In practice, it can be expected that the identification and investigation of pUXOs (step 2) would be subject to a separate method statement from the clearance of cUXOs using low-order methods (step 3) and the removal and disposal of large debris (step 4). In each case, a methodology including the necessary information in accordance with relevant policy and best practice guidance, a plan showing the area in which the activities are proposed to take place, a programme of works and any exclusions zone and/or environmental micro-siting requirements will be provided in accordance with the Marine Licence Principles document (J9 F06). As such, the Applicant does not consider a separate clearance plan necessary as this would duplicate information provided as part of the method statement for UXO clearance. The Applicant confirms that should high order UXO clearance be required, this would be subject to a separate marine licence application.
24	We highlight the release of a Government Joint Position Statement, which was released in January 2025 and may be found here Marine environment: unexploded ordnance clearance Joint Position Statement - GOV.UK. We confirm the Applicant's commitment to prioritising low noise methods of clearance is compliant with this statement however, this does not change our opinion regarding it being included in licences at this stage of the development.	The Applicant notes the updated Joint Position Statement, has reviewed it and the Mona Offshore Wind Project conforms with it. The Applicant acknowledges low noise methods should be the default method of clearance and therefore the Applicant has committed to only low order clearance methods being used for UXO clearance under this standalone NRW Marine Licence. The Applicant notes the Joint Position Statement states, 'high order clearance methods should always be the last resort' and highlights the commitment to the UXO hierarchy secured in the Mitigation and Monitoring Schedule (J10 F07). The Applicant is not seeking to authorise high order UXO detonation clearance under the standalone NRW Marine Licence. Should high order UXO clearance be required, as a last resort, the Applicant will apply for a separate marine licence to cover this activity.
25	**5 Benthic ecology (offshore) comments** At close of the final deadline, Deadline 7 of the DCO process, Tuesday 14 January 2024, JNCC consider that there are some outstanding issues/concerns which remain with the Project in relation to transmission assets for the marine offshore (past 12nm) benthic environment, these concerns equally apply to the NRW Marine Licence. These are detailed below.	The Applicant notes the JNCC's comment and has provided responses to the outstanding matters raised by the JNCC in Rows 26 to 32 below.

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26	**5.1 SNCB remit** On a number of occasions within responses from the Applicant during the DCO process, references have been made by the Applicant to the fact that although JNCC have concerns, NRW (A) have not raised similar or corresponding concerns. In the most part it is not appropriate to make such a comparison since JNCC have an offshore remit (outside 12nm) and NRW (A) have an inshore remit (within 12nm). This leads to independent concerns raised by the two organisations which should be treated as such and not compared. JNCC has previously detailed the legal basis of these remits within our response to the Examiners Questions 1 (Q1.17.4; REP3-084) of the DCO process and would direct the Applicant to that response. We have highlighted some specific examples below from the Applicant's Deadline 6 submissions in the DCO process:	The Applicant notes the JNCC's comment. The Applicant has given full consideration to JNCC's remit and has given equal weight to both JNCC and NRW (A)'s responses, but on occasions, both SNCBs have independently commented on the same matter, and therefore, the Applicant has highlighted for NRW MLT where differences in advice have been provided. The Applicant has undertaken a suitably robust assessment of the decommissioning phase of the Mona Offshore Wind Project for benthic subtidal and intertidal ecology in Volume 2, Chapter 2: Benthic subtidal and intertidal ecology (F2.2 F02) in accordance with industry good practice with respect to Environmental Impact Assessments (CIEEM, 2022; OSPAR, 2008). Further detail has been provided in Rows 29 and 30 below.
27	REP6-091, Applicant's response to REP5-094.1 – Marine Decommissioning. The Applicant states their approach to decommissioning "*accords with NRW (A)'s position*". However, the bulk of marine decommissioning for the Mona Project occurs in offshore waters (past 12nm) which is within JNCC's remit and we would therefore maintain that JNCC's position for offshore decommissioning, as stated in Section 5.2 of this response and REP5-094 of the DCO process, should not be compared with that of NRW (A) and should be taken into consideration.	
28	REP6-091, Applicant's response to REP5-094.4 – Maximum Design Scenario (MDS). The Applicant states that: "*Other than the JNCC, no other interested party, including NRW (A), have raised concerns regarding the MDS defined in Volume 2, Chapter 2: Benthic subtidal and intertidal ecology (APP-054)*". However, all Offshore Substation Platforms (OSPs) are located offshore (past 12nm), and therefore fall within JNCC's remit. As these infrastructures constitute the bulk of the MDS for the transmission assets NRW Marine Licence, it would be expected that JNCC would be the main, and possibly only, stakeholder to raise concerns in this instance.	
29	**5.2 Marine decommissioning**	

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	Marine decommissioning is our greatest outstanding concern with the Project in relation to the offshore marine benthic environment. JNCC is of the opinion that decommissioning activities have not been fully considered. The recently published guidelines by Offshore Energies UK (OEUK, 2024) 'Designing for Decommissioning of Offshore Wind' states that: "*Assets should be designed to be decommissioned with a technology available at the time of commissioning*" In addition, the Examining Authority for Five Estuaries Offshore Wind Farm Limited (project EN010115) has requested from the Applicant that: "*Decommissioning is required to be assessed in order that the Examining Authority (ExA) and Secretary of State can have regard to the likely significant effects of the whole project over its lifecycle in making a recommendation and determination.*"	The JNCC's concerns relating to decommissioning are applicable to all offshore industries rather than being specific to the project or offshore wind industry. For the Mona Offshore Wind Project, no offshore decommissioning works will take place until a written decommissioning programme has been approved by the Secretary of State for the Department for Energy Security and Net Zero (DESNZ). This is secured as a Requirement of the draft DCO. The scope of the decommissioning works would be determined by the relevant legislation and guidance at that time and would be licenced by a separate marine licence to be applied for at the relevant time. Notwithstanding this, the Applicant is confident that all infrastructure could be removed based on current-day technology in accordance with current guidance and the Applicant would not have included decommissioning options (in the project description (Volume 1, Chapter 2: Project description (F1.3 F02)) if the Applicant did not consider they were feasible.
30	It should also be noted that 'The Decommissioning of Offshore Renewable Energy Installations under the Energy Act 2004: Guidance notes for industry' (2019) for England and Wales sets out that, at the end of a wind farm's operational life, all infrastructure is expected to be fully removed. JNCC feel it is imperative that, in order to determine the likely significant effects of the project as a whole for the offshore environment, the OEUK 'Designing for Decommissioning of Offshore Wind' guidelines are followed and decommissioning of all infrastructure is assessed based on available technologies now and not in the future.	The Applicant considers that a suitably robust assessment of the decommissioning phase of the Mona Offshore Wind Project for benthic subtidal and intertidal ecology has been undertaken in Volume 2, Chapter 2: Benthic subtidal and intertidal ecology (F2.2 F02) as required by the Overarching National Policy Statement (NPS) for Energy (EN-1; see paragraph 4.3.5) and the NPS for Renewable Energy Infrastructure (EN-3; paragraphs 2.8.88-2.8.89, 2.8.119, 2.8.122, 2.8.227 and 2.8.233). The Applicant's assessment is based on currently available technologies and has been undertaken in accordance with good industry practice with respect to Environmental Impact Assessments (CIEEM, 2022; OSPAR, 2008) and industry guidance (OEUK, 2024) and should enable the JNCC to have regard to the likely significant effects of the Mona Offshore Wind Project over its whole lifetime. The Applicant does not think it is appropriate or necessary for any further assessment of decommissioning to be provided at the point of Application.
31	**5.3 Significance of effect and mitigation and monitoring of 'seapens and burrowing megafauna communities' Important Ecological Feature (IEF)** 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 suggested the following be added to the mitigation measures and conditions outlined in Volume 2, Chapter 2: Benthic subtidal and	It remains the Applicant's position that the magnitude of impact to the 'seapens and burrowing megafauna communities' Important Ecological Feature (IEF) is low and the sensitivity is medium, resulting in a conclusion of minor adverse significance from habitat loss/disturbance. The Applicant considers that this assessment is sufficient precautionary on the basis that: 1. The habitat present within the Mona Array Area bears a negligible resemblance to The Convention for the Protection of the Marine

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	intertidal ecology (APP-054), the Mitigation and Monitoring Schedule (APP-196), and the DCO (PDA-003). "*If seapens are noted during pre-construction surveys they should be avoided as much as practically possible during the subsequent proposed operations.*" 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. JNCC welcomes the addition of this mitigation measure to the Mitigation and Monitoring Schedule and would also like this to be secured within the standalone NRW Marine Licence.	Environment of the North-East Atlantic (OSPAR) habitat for the following reasons: • The maximum burrow density recorded was highly precautionary because total burrows per image were not recorded, rather burrows were assigned a range (i.e. 1 – 5, 6 – 10 etc.) and, to determine the maximum burrow density, the top end of the range bracket was used to obtain the maximum total number of burrows and from that the density then calculated. • The majority of burrows were small (49% within the 0 – 1 cm size range category). • Gravelly sediments predominated which do not typically support this habitat. • Burrowing fauna not associated with the 'seapens and burrowing megafauna communities' habitat locations were observed including *Ceriantharia* and *Ensis*. • There was no evidence of any species associated with 'seapens and burrowing megafauna communities' habitat. • No seapens were observed during the surveys. 2. The habitat is a broadscale habitat recorded across the east Irish Sea. 3. The Applicant committed to a number of project refinements post the Preliminary Environmental Information Report (PEIR), which are detailed in sections 4.10 and 4.11 of Volume 1, Chapter 4: Site Selection and Consideration of Alternatives (F1.4 F03), to reduce the impact to benthic receptors. 4. Impacts to the habitat from temporary habitat loss/disturbance will be intermittent over the four-year construction phase. 5. The predicted recovery of the key component of the community recorded in the Mona Array Area (i.e. the burrowing megafauna component of the habitat) to temporary habitat disturbance is medium (i.e. recovery in two to 10 years) and so the habitat, as recorded, is predicted to recover. The Applicant has reviewed the implications of assuming a 'high' sensitivity for the 'seapens and burrowing megafauna communities' IEF and considers that this would not alter the overall conclusion of minor adverse significance for this IEF. The Applicant does not agree with the JNCC's recommendation that to adopt a

Paragraph Reference	Written Submission Comment	Applicant's response
		'worst-case scenario approach' means taking the higher end of a range of significance (i.e. automatically selecting moderate when the option is a range of minor to moderate) and nor is this consistent with the EIA methodology outlined in Volume 1, Chapter 5: Environmental Impact Assessment methodology (F1.5). On this basis, and for the reasons outlined above, the Applicant does not consider that mitigation for the 'seapens and burrowing megafauna communities' IEF is warranted or proportionate given the Applicant's confidence that the effects will be no greater than minor adverse significance on this IEF, and that the assessment presented in Volume 2, Chapter 2: Benthic subtidal and intertidal ecology (F2.2 F02) is sufficiently robust and representative of a reasonable worst case scenario for the habitats recorded in the Mona Array Area. However, notwithstanding this, the Applicant accepted the commitment requested by the JNCC to avoid seapens identified in the pre-construction surveys, where possible. The Applicant has, therefore, included the following commitment in the Mitigation and Monitoring Schedule (J10 F07): "*if seapens are noted during the pre-construction surveys they should be avoided as much as practically possible during the subsequent proposed operations*". This aligns with the wording proposed by the JNCC. This commitment should not, however, form part of the conditions of the standalone NRW Marine Licence as it would not be appropriate for such a commitment to be introduced on a statutory basis where there is no justification from an environmental impact assessment perspective. The Applicant is, as stated, able to commit to this in the Mitigation and Monitoring Schedule (J10 F07) as there can be flexibility over its application (which is needed as a consequence of its imprecise approach and drafting) but it would be inappropriate and not meet the test for a condition if included within the dML or the standalone NRW Marine Licence. The Applicant highlights that the reference to 'pre-construction surveys' in Row 114 of the Mitigation and Monitoring Schedule (J10 F07) applies to pre-construction surveys that would be carried out under the DCO/dML and standalone NRW Marine Licence as pre-commencement works and would therefore not be subject to the conditions of the marine licences in any case.
32	**5.4 Maximum design scenario** In the Applicant's Deadline 3 submission of the DCO process, 'Response to JNCC D2 Submission' (REP3-036; response REP2-097.72), the Applicant provided an explanation for the calculations within the Maximum Design Scenario, including a table detailing Option 1 and Option 2 for suction bucket 4-legged jacket foundations. JNCC found this to be very	The Applicant does not agree that further information should be provided beyond that which is already presented in Volume 1, Chapter 2: Project description (F1.3 F02) and Volume 2, Chapter 2: Benthic subtidal and intertidal ecology (F2.2 F02). This is because, as raised with the JNCC during meetings held on 4 September, 15 October and 18 December 2024, there is a vast amount of detail and calculations which sit behind the project description and each of the MDSs

Paragraph Reference	Written Submission Comment	Applicant's response
	useful and clear, providing much needed transparency in the Applicant's calculations of the maximum design scenario. JNCC would therefore request that similar tables are provided and incorporated into the final documentation, including Volume 2, Chapter 2: Benthic subtidal and intertidal ecology (APP-054), regarding Offshore Substation Platform (OSP) foundation sizes (as commented on in REP3-036; response REP2-097.77) so we can be confident that the values which the Applicant quotes are correct and to allow for complete transparency.	which it would not be proportionate to provide. The level of detail provided by the Applicant in Volume 1, Chapter 2: Project description (F1.3 F02) and Volume 2, Chapter 2: Benthic subtidal and intertidal ecology (F2.2 F02) is consistent with that provided for other offshore wind farm applications. Further, the NPS EN-1 (paragraph 4.3.12) supports an assessment of an MDS provided that the likely worst-case parameters for the assessment are clearly defined, which the Applicant considers to be the case. Given that no errors were found in the clarifications presented by the Applicant throughout the DCO process, the Applicant is confident that the values quoted in Volume 1, Chapter 2: Project description (F1.3 F02) and Volume 2, Chapter 2: Benthic subtidal and intertidal ecology (F2.2 F02) are correct and, therefore, considers that there is no reasonable justification for the JNCC to not have confidence in the numbers quoted by the Applicant. Further, the Applicant acknowledges that it is the Applicant's responsibility to satisfy themselves that the Mona Offshore Wind Project can be constructed within the parameters specified within the standalone NRW Marine Licence, and that they will need to adhere to those values and the MDSs assessed within the EIA. The Applicant is, therefore, confident that the values specified are correct and accurate and will not be exceeded, that the MDS for all impact pathways is clear and has been correctly calculated and assessed in Volume 2, Chapter 2: Benthic subtidal and intertidal ecology (F2.2 F02).
33	**6 Documentation updates** Throughout the Examination process, a large quantity of documentation has been produced which the Applicant has updated through a number of additional responses. JNCC has welcomed these updates by the Applicant but for clarity and transparency, especially with future Projects looking back on methodologies and conclusions of this work, we would like these changes and updates to be fully incorporated in clean final versions of the initial submissions for the NRW Marine Licence.	All relevant documents updated through the DCO process have been submitted to NRW MLT and are available on the NRW public register by searching ORM2429T. The most recent submissions were made on 23 January 2025, following the close of the DCO Examination process on 17 January 2025. All documents are listed in the updated Guide to the standalone NRW Marine Licence application (A2 F05). The information provided through the DCO process and the standalone NRW Marine Licence process to date is, therefore, fully aligned.

1.4 Applicant's Response to Cadw

Table 1.3: Cadw.

Paragraph Reference	Written Submission Comment	Applicant's response
1	**No objection** Additional information has been submitted in support of this application. In general, this information does not alter the advice given previously: However, it is noted that a revised Offshore Written Scheme of Investigation and Protocol for Archaeological Discoveries is included with the new information which will be put in place in order so that any archaeological sites or features revealed during the construction programme are appropriately investigated and recorded. The proposed measures appear to be appropriate but the determining authority should consult the Maritime Investigator of the Royal Commission on the Ancient and Historic Monuments of Wales for specific advice on the effect of the proposed development on marine archaeology. It should be noted that Table 1.1 of this document contains the wrong address for Cadw. This should be changed to: Cadw, Welsh Government, Rhydycar Business Park, Merthyr Tydfil, CF48 1UZ. The e-mail address and telephone number remain the same.	The Applicant notes and welcomes Cadw's submission relating to the updated Outline Offshore Written Scheme of Investigation (WSI) and Protocol for Archaeological Discoveries (PAD) (J18 F03). Table 1.1 of the final version of the Offshore WSI and PAD will be updated post-consent to include the correct address for Cadw.

1.5 Applicant's Response to the Department of Agriculture, Environment and Rural Affairs

Table 1.4: Department of Agriculture, Environment and Rural Affairs.

Paragraph Reference	Written Submission Comment	Applicant's response
1	My apologies for the delay in sending a response. We have one minor comment to make to ensure completeness of the HRA. We noticed that the East Coast Marine pSPA was not included in the screening whereas the Copelands SPA was. No LSE is likely for East Coast Marine so no need to take to Stage 2 but it should be listed alongside the Copelands. We are content with the conclusions for the four marine mammal SACs.	The Applicant notes the Department of Agriculture, Environment and Rural Affairs' (DAERA's) response, which highlights the absence of the East Coast Marine proposed SPA (pSPA) from the HRA Stage 1 Screening Report (E1.4 F03). The Applicant undertook the screening of SPAs using the publicly available download from the DAERA's website (https://www.daera-ni.gov.uk/publications/special-protection-areas-digital-datasets), which does not include the East Coast Marine pSPA (presumably due to the fact that it's a pSPA and not a fully designated SPA). The East Coast Marine pSPA has no connectivity with the Mona Offshore Wind Project for all of the site's features bar one, Manx shearwater. Manx shearwater breeding on three islands (Copeland Island, referred to as Big Copeland, together with Light House Island and Mew Island) raft at sea before coming to land at night. The East Coast Marine pSPA is designated to protect this area of sea which is important to Manx shearwater. The breeding colonies are protected within the Copeland Islands SPA, for which the Applicant has presented an assessment. Therefore, the Applicant agrees that a Likely Significant Effect (LSE) on East Coast Marine pSPA can be ruled out at the screening stage and reiterates that a full assessment against the conservation objectives of the Copeland Islands SPA is provided. This is also how the North-west Irish Sea candidate SPA (cSPA) was assessed (see Table 1.56 of Stage 1 HRA Screening). The Applicant has therefore not updated the HRA.

1.6 Applicant's Response to Heneb: The Trust for Welsh Archaeology – Clwyd-Powys Region

Table 1.5: Heneb: The Trust for Welsh Archaeology – Clwyd-Powys Region.

Paragraph Reference	Written Submission Comment	Applicant's response
1	As the landfall is within Conwy CBC the correct consultee in this case would be Jenny Emmett jenny.emmett@heneb.org.uk. As most of the licence documents refer to offshore transmission assets you should also consult Dr Julian Whitewright at RCAHMW via julian.whitewright@rcahmw.gov.uk. I have only been involved with the onshore cable trench and substation in Denbighshire via the DCO process and we have no concerns about the archaeological mitigation for the onshore section in Denbighshire.	The Applicant notes and welcomes Heneb: The Trust for Welsh Archaeology – Clwyd-Powys Region's response. The Applicant has consulted with the Royal Commission on the Ancient and Historical Monuments of Wales (RCAHMW) throughout the Mona Offshore Wind Project DCO and standalone NRW Marine Licence application, including in Table 1.12.

1.7 Applicant's response to the Maritime and Coastguard Agency

Table 1.6: Maritime and Coastguard Agency.

Paragraph Reference	Written Submission Comment	Applicant's response
1	I can't see what additional information has been provided on the shipping and navigation reports therefore I have no comments to submit.	The only updated shipping and navigation document submitted to NRW MLT since the last round of consultation in August 2024 is the updated Outline Vessel Traffic Management Plan (J14 F02). This now includes a commitment to continue engagement with shipping and navigation stakeholders via the Marine Navigation Engagement Forum (MNEF) for a minimum of five years into the operations and maintenance phase.

1.8 Applicant's Response to MOD Safeguarding

Table 1.7: MOD Safeguarding.

Paragraph Reference	Written Submission Comment	Applicant's response
1	Thank you for your email below containing submission of further information on the consultation for ORML2429T. This information does not amend the array (turbine number or dimensions), and export cables that have already been assessed. The Ministry of Defence (MoD) has no further comments to make. The MoD response Reference DIO10055142 dated 6 August 2024 issued to the Planning Inspectorate remains extant.	The Applicant welcomes the Ministry of Defence's (MoD's) response, noting that the MoD submission DIO10055142 dated 6 August 2024 in the Mona Offshore Wind Project DCO examination relates to the Mona Array Area and specifically, the potential impact of the wind turbines on Primary Surveillance Radar (PSR) at Warton Aerodrome (against which, the Applicant has secured implementation of mitigation through inclusion of a requirement in the draft DCO) and that no concerns were raised by MoD with regard to the transmission assets associated with this standalone NRW Marine Licence application.

1.9 Applicant's Response to NatureScot

Table 1.8: NatureScot.

Paragraph Reference	Written Submission Comment	Applicant's response
1	As this application and consultation solely relate to transmission assets, which make landfall in North Wales, we have no comments to provide.	The Applicant notes NatureScot's comment.

1.10 Applicant's Response to Natural Resources Wales Cockle Management

Table 1.9: Natural Resources Wales Cockle Management.

Paragraph Reference	Written Submission Comment	Applicant's response
1	After reviewing the Marine licence application and further information documents for case file ORML2429T, we can see no effect to the Dee Estuary Cockle Fishery.	The Applicant notes and welcomes the NRW Cockle Management Officers' response.

1.11 Applicant's Response to North Western Inshore Fisheries and Conservation Authority

Table 1.10: North Western Inshore Fisheries and Conservation Authority.

Paragraph Reference	Written Submission Comment	Applicant's response
1	The North Western Inshore Fisheries and Conservation Authority has reviewed the further information from the applicant for the Mona Transmission Assets (ORML2429T) and has no comments to make.	The Applicant notes and welcomes the North Western Inshore Fisheries and Conservation Authority's response.

1.12 Applicant's Response to Environmental Public Health Service Wales

Table 1.11: Environmental Public Health Service Wales.

Paragraph Reference	Written Submission Comment	Applicant's response
1	Thank you for consulting the Environmental Public Health Service Wales (a service delivered jointly by Public Health Wales Environmental Health Protection Team and the UK Health Security Agency for Radiation, Chemical and Environmental Hazards Directorate (Wales)) on the above application. Having reviewed the human health assessment report and the draft marine licence we are satisfied that the proposed mitigation measures will minimise any adverse impact on public health. We would expect the Regulator ensure all on-shore and off-shore activities are well managed and the operator maintains compliance to licence conditions to reduce any impacts on human health. Assessment of risks to water quality should ensure there are no adverse direct or indirect impacts on human health including any dedicated bathing locations. We recommend the regulator is satisfied with the proposed measures to avoid any onshore adverse impacts to human health associated with water quality. Should any additional information be obtained by the Regulator that might significantly alter the contents of the application we would be happy to review this position.	The Applicant notes and welcomes the response from Environmental Public Health Service Wales.

1.13 Applicant's Response to Royal Commission on the Ancient and Historical Monuments of Wales

Table 1.12: Royal Commission on the Ancient and Historical Monuments of Wales.

Paragraph Reference	Written Submission Comment	Applicant's response
1	I can confirm that RCAHMW is content with the revised documentation. Specifically, the January 2025 WSI/PAD now reflects the comments that we made in conjunction with the original marine license application last year. So all good from our perspective.	The Applicant welcomes RCAHMW's response.

1.14 Applicant's Response to the Royal Yachting Association

Table 1.13: Royal Yachting Association.

Paragraph Reference	Written Submission Comment	Applicant's response
1	We have reviewed the additional information for the above project. Our remaining concern is around the approach to the cable landfall and potential reduction in under keel clearance. The area of concern is the passage route from the River Dee to Llandudno, where water depths are typically 5m or less. The area between Llandudno and the River Dee out to the 10m contour is considered a general boating area by local clubs. The applicant should ensure that there is no reduction in under keel clearance where depths are less than 5m.	The Applicant notes this response and confirms that an oCMS which includes a Cable Specification and Installation Plan (CSIP) and Cable Burial Risk Assessment (CBRA) (see Table 7.17 of Volume 2, Chapter 7: Shipping and navigation (F2.7 F02)) will be prepared, which the Applicant expects will be secured in the standalone NRW Marine Licence in line with the Marine Licence Principles document (J9 F06). The CSIP will include cable burial, where possible, to reduce the potential for effects on under keel clearance. Furthermore, the CSIP and CBRA will also include a commitment limiting the reduction in water depth (referenced to Chart Datum) to no more than 5% at any point along the Mona offshore cable corridor without prior written approval from the Licensing Authority in consultation with the Maritime and Coastguard Agency and Trinity House. This commitment is set out in the Mitigation and Monitoring Schedule in row 14 (J10 F07). A 5% reduction in depths of 5 to 10 m, equates to a reduction of between 0.25 to 0.5 m. Given the draughts of yachts and other recreational craft of approximately 1.0 m to 3.0 m, and a minimal reduction in water depth, Volume 2, Chapter 7: Shipping and navigation (F2.7 F02) concluded that the impact on under keel clearance would be negligible adverse given compliance with this mitigation (Section 7.9.12 of Volume 2, Chapter 7: Shipping and navigation (F2.7 F02)).

1.15 Applicant's Response to The Crown Estate

Table 1.14: The Crown Estate.

Paragraph Reference	Written Submission Comment	Applicant's response
1	The Crown Estate has no objection to the granting of a Marine Licence for works associated with the construction and maintenance of the transmission assets of the Mona Offshore Windfarm. This is subject to the condition that the applicant has obtained all relevant and necessary consents from The Crown Estate ahead of carrying out any of the proposed activities. The Crown Estate is in the process of granting the applicant an Agreement for Lease for Mona Offshore Windfarm Transmission Assets, but this will not cover proposed activities such as UXO clearance, dredging and disposal of materials which are mentioned in the marine licence application. These are examples where additional consent could be required from The Crown Estate and it is the applicant's responsibility to ensure they have obtain The Crown Estate's consent for all of the proposed activities and seek additional consent from The Crown Estate where these activities are not consented to or comply with the obligations on the applicant in the Transmission Asset Agreement for Lease and subsequent Transmission Asset Lease and/or are outside of the areas under these agreements for Mona Offshore Windfarm.	The Applicant notes and welcomes The Crown Estate's (TCE's) response. The Applicant and The Crown Estate are in discussion regarding the granting of the Agreement for Lease for Mona Offshore Windfarm Transmission Assets, as well as any other consents that may be necessary for the Applicant to obtain from The Crown Estate, based on the final project design and associated construction activities. The Applicant understands its obligations to obtain these consents prior to the undertaking of those relevant activities, and sees no impediment to obtaining them at the appropriate time, post-grant of the Marine Licence, where needed.

1.16 Applicant's Response to Trinity House

Table 1.15: Trinity House.

Paragraph Reference	Written Submission Comment	Applicant's response
1	Thank you for this additional information. I can confirm that my previous response, dated 19/08/24 attached, remains valid.	The Applicant notes and welcomes Trinity House's response. The Applicant has provided a full response to the points raised by Trinity House in the previous round of consultation in Table 1.14 of The Applicant's Responses to Other Consultees (S_NRWML_4). The points raised by Trinity House were in relation to the drafting of the standalone NRW Marine Licence which is a matter for NRW MLT.

1.17 Applicant's Response to Welsh Government Fisheries

Table 1.16: Welsh Government Fisheries.

Paragraph Reference	Written Submission Comment	Applicant's response
1	In REP5-091 the Welsh Government fisheries division raised concerns that the supporting documentation did not adequately assess existing site specific evidence for several species, including king and queen scallop, relying instead on desk-based research. In addition, it is not clear how the assessment of impact magnitude relates to fishing businesses in the real world. Consequently, it was suggested that confidence in the impact assessment on those species and the fishing businesses dependent on them would be low.	The Applicant notes the Welsh Government Fisheries' comments and offers the following clarification to outstanding comments: The Applicant assumes that Welsh Government Fisheries is referring to the ecological baseline presented in Volume 6, Annex 3.1: Fish and shellfish ecology technical report (F6.3.1) and the impact assessment in Volume 2, Chapter 3: Fish and shellfish ecology (F2.3 F02). The ecological baseline in Volume 6, Annex 3.1: Fish and shellfish ecology technical report (F6.3.1) for king and queen scallops in the eastern Irish Sea is based on multiple robust data sources, including: • Annual scallop stock assessment research reports from Bangor University (Bangor University, 2015-2021) • Research from the Isle of Man Manx Marine Environmental Assessment (Howe *et al*., 2018) • Data provided by scallop fisheries in the area (Delargy *et al*., 2019) • Monitoring surveys from nearby offshore wind farms (as set out in Table 1.1 of Volume 6, Annex 3.1: Fish and shellfish ecology technical report (F6.3.1)). The baseline characterisation was also informed by site specific survey data (see section 1.3.2 of Volume 6, Annex 3.1: Fish and shellfish ecology technical report (F6.3.1)) which has been used to characterise habitats within and in the vicinity of the project boundaries which are used by fish and shellfish receptors (including considering suitability of habitats/sediments for fish and shellfish Important Ecological Features (IEFs) in the study area). These site specific and desktop data sources considered that both scallop species are likely to occur and to spawn across the area which they occur and are targeted by commercial fisheries. The Applicant has assessed both species as Important Ecological Features (IEFs) for each impact in Volume 2, Chapter 3: Fish and shellfish ecology (F2.3) and has concluded no significant impacts. The assessment is based on a conservative MDS wherein the construction of the Mona Offshore Wind Project will occur sequentially throughout the construction

Paragraph Reference	Written Submission Comment	Applicant's response
		phase, with only a small proportion of the total footprint affected at any one time, and so recovery of scallop populations will be occurring even throughout the construction phase and following completion of construction. The Applicant highlights sections 6.8.7 and 6.10.5 of Volume 2, Chapter 6: Commercial fisheries (F2.6), which has assessed the potential for indirect effects on commercially important fish and shellfish resources as a result of impacts on fish and shellfish ecology receptors (as identified within Volume 2, Chapter 3: Fish and shellfish ecology (F2.3 F02)), and specifically identifies king and queen scallop as commercially important species in paragraph 6.8.7.3. The Applicant has committed to undertaking monitoring of Inshore Vessel Monitoring System and landings data from the Mona Offshore Wind Project commercial fisheries study area annually for the first five years of the operations and maintenance phase. This commitment is outlined in the Outline Fisheries Liaison and Co-Existence Plan (J13 F03) and as detailed in the Marine Licence Principles document (J9 F06), is expected to be secured within the standalone NRW Marine Licence. Furthermore, in response to comments received from commercial fisheries stakeholders who consider monitoring of queen scallop to be important for confirming the accuracy of the assessment, the Applicant has also committed to developing and implementing a queen scallop monitoring programme in and around the Mona Array Area for up to five years post-construction. This commitment is set out in the Outline Fisheries Liaison and Co-Existence Plan (J13 F03) and the updated Offshore In-Principle Monitoring Plan (J15 F03). The purpose of this monitoring is to validate the conclusions of the assessment presented in Volume 2, Commercial fisheries (F2.6), and to strengthen the evidence base regarding the interaction between commercial fishing activity and offshore wind.
2	The applicant was informed that Bangor University hold several years of queen scallop survey data for array area that has not been analysed or published. Although effort has been made to mitigate impacts on habitats and fishing activity in the development design and to manage stakeholder relationships though the Outline Fisheries Liaison and Co-Existence Plan, the applicant's response REP6-102 did not commit to arranging for the analysis and publication of the Bangor University data in its baseline assessments. The In-Principle Monitoring Plan and Fisheries Liaison and Co-existence Plan contain commitments to	The Applicant has incorporated data and research from Bangor University in the form of annual stock assessments to inform the king and queen scallop baseline in section 1.10.2 of Volume 6, Annex 3.1: Fish and shellfish ecology technical report (F6.3.1). These annual stock assessments are informed by the survey data collected by Bangor University and, therefore, additional analysis of this survey data would not alter the baseline characterisation for queen or king scallop. King and queen scallop were considered as IEFs and assessed against each impact in Volume 2, Chapter 3: Fish and shellfish ecology (F2.3 F02), with no significant impacts concluded for the project alone or cumulatively.

Paragraph Reference	Written Submission Comment	Applicant's response
	dredge surveys to produce a baseline assessment for queen scallop, as well as unspecified king scallop monitoring against which to measure impact and 5 years surveys post-construction. This has been included as "Condition 18(1)(e)(v) of the deemed marine licence under Schedule 14 of the draft DCO (C1 F07)" and is expected to be secured within a standalone NRW marine licence.	The Applicant has committed to undertaking monitoring of scallop populations pre- and post-construction as set out in Table 1.5 of the Offshore In-Principle Monitoring Plan (J15 F03). This will include consideration of ongoing and future work being undertaken on these species by local organisations, including regional monitoring programmes and input from key fisheries stakeholders, to ensure that the monitoring undertaken by the Applicant is appropriately contextualised.

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