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MORGAN OFFSHORE WIND PROJECT: GENERATION ASSETS

HRA stage 2 information to support an appropriate assessment

Part 1: Introduction

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Contents

Tables

Figures

Supporting Documents

HRA Stage 2 ISAA Part 2 - SAC Assessments (Document Reference E1.2)

HRA Stage 2 ISAA Part 3 – SPA and Ramsar Sites Assessments (Document Reference E1.3)

HRA Stage 1 Screening Report (Document Reference E1.4)

HRA Integrity matrices (Document Reference E1.5)

Glossary

Term	Meaning
Annex I habitat	A natural habitat type of European community interest, defined in Annex I of the Council Directive 92/43/EEC on the Conservation of natural habitats and of wild fauna and flora (Habitats Directive), whose conservation requires the designation of Special Areas of Conservation (SAC).
Annex II species	Animal or plant species of community interest, defined in Annex II of the Council Directive 92/43/EEC on the Conservation of natural habitats and of wild fauna and flora (Habitats Directive), whose conservation requires the designation of Special Areas of Conservation (SAC).
Applicant	Morgan Offshore Wind Limited.
Appropriate Assessment	A stepwise procedure undertaken in accordance with Article 6(3) of the Habitats Directive, to determine the implications of a plan or project on a European site in view of the site's conservation objectives, where the plan or project is not directly connected with or necessary to the management of a European site but likely to have a significant effect thereon, either individually or in-combination with other plans or projects.
Competent Authority	The term derives from the Habitats Regulations and relates to the duties which the Regulations impose on public bodies and individuals. Regulation 6(1) defines competent authorities as 'any Minister, government department, public or statutory undertaker, public body of any description or person holding a public office'.
Conservation objectives	In its most general sense, a conservation objective is the specification of the overall target for the species and/or habitat types for which a site is designated in order for it to contribute to maintaining or reaching Favourable Conservation Status (FCS) of the habitats and species concerned, at the national, the biogeographical or the European level.
Cumulative effects	Changes to the environment caused by a combination of present and future projects, plans or activities.
Development Consent Order	An order made under the Planning Act 2008 granting development consent for one or more Nationally Significant Infrastructure Project (NSIP).
Environmental Statement	The document presenting the results of the Environmental Impact Assessment (EIA) process for the Morgan Offshore Wind Project.
European Commission	The executive body of the European Union responsible for proposing legislation, enforcing European law, setting objectives and priorities for action, negotiating trade agreements and managing implementing European Union policies and the budget.
European site	A Special Area of Conservation (SAC), possible SAC (pSAC), or candidate SAC, (cSAC), a Special Protection Area (SPA) or potential SPA (pSPA), a site listed as a Site of Community Importance (SCI) and Ramsar sites.
Evidence Plan	The Evidence Plan is a mechanism to agree upfront what information the Applicant needs to supply to the Planning Inspectorate as part of the Development Consent Order (DCO) application for the Morgan Generation Assets.
Evidence Plan Expert Working Group	Expert working groups set up with relevant stakeholders as part of the Evidence Plan process.
Habitats Directive	The Habitats Directive is the short name for European Union Council Directive 92/43/EEC on the conservation of natural habitats and of wild fauna and flora. The Directive led to the establishing of European sites and setting out how they should be protected, it also extends to other topics such as European protected species.

Term	Meaning
Habitats Regulations	The Conservation (Natural Habitats, &c.) Regulations 1994, the Conservation of Habitats and Species Regulations 2017 and the Conservation of Offshore Marine Habitats and Species 2017.
Habitats Regulations Assessment	A process required by the Habitats Regulations of identifying likely significant effects of a plan or project on a European site and (where likely significant effects are predicted or cannot be discounted) carrying out an Appropriate Assessment to ascertain whether the plan or project will adversely affect the integrity of the European site. If an Adverse Effect on the Integrity of the site cannot be ruled out, the latter stages of the process require consideration of the derogation provisions in the Habitats Regulations.
In-combination effects	The combined effect of the Morgan Offshore Wind Project in-combination with the effects from a number of different projects on the same feature/receptor.
Inter-array cables	Cables which connect the wind turbines to each other and to the offshore substation platforms. Inter-array cables will carry the electrical current produced by the wind turbines to the offshore substation platforms.
Interconnector cables	Cables that may be required to interconnect the Offshore Substation Platforms to provide redundancy in the case of cable failure elsewhere.
Likely Significant Effect	Any effect that may reasonably be predicted as a consequence of a plan or project that may affect the conservation objectives of the features for which the European site was designated but excluding trivial or inconsequential effects. A likely effect is one that cannot be ruled out on the basis of objective information. A 'significant' effect is a test of whether a plan or project could undermine the site's conservation objectives.
Marine licence	The Marine and Coastal Access Act 2009 requires a marine licence to be obtained for licensable marine activities. Section 149A of the Planning Act 2008 allows an applicant for a DCO to apply for 'deemed marine licence' as part of the DCO process.
Maximum Design Scenario	The scenario within the design envelope with the potential to result in the greatest impact on a particular topic receptor, and therefore the one that should be assessed for that topic receptor.
Mona Offshore Wind Project	The Mona Offshore Wind Project is comprised of both the generation assets and offshore and onshore transmission assets and associated activities.
Morgan Array Area	The area within which the wind turbines, foundations, inter-array cables, interconnector cables, offshore export cables and Offshore Substation Platforms (OSPs) forming part of the Morgan Generation Assets will be located.
Morgan and Morecambe Offshore Wind Farms: Transmission Assets	The transmission assets for the Morgan Offshore Wind Project and the Morecambe Offshore Windfarm. This includes the OSPs, interconnector cables, Morgan offshore booster station, offshore export cables, landfall site, onshore export cables, onshore substations, 400kV grid connection cables and associated grid connection infrastructure such as circuit breaker infrastructure.
Morgan Offshore Wind Project: Generation Assets	This is the name given to the Morgan Generation Assets project as a whole (includes all infrastructure and activities associated with the project construction, operations and maintenance, and decommissioning).
Morgan Offshore Wind Project	The Morgan Offshore Wind Project is comprised of both the generation assets and offshore and onshore transmission assets and associated activities.
Offshore Substation Platform (OSP)	A fixed structure located within the wind farm sites, containing electrical equipment to aggregate the power from the wind turbine generators and convert it into a more suitable form for export to shore.

Term	Meaning
Ramsar site	A wetland site designated to be of international importance under the Ramsar Convention. The Convention on Wetlands, known as the Ramsar Convention.
Special Area of Conservation	SACs are areas designated under the European Union (EU) Habitat's Directive to help conserve certain plant and animal species listed in the Directive. Article 3 of the Habitats Directive requires the establishment of a European network of important high-quality conservation sites that will make a significant contribution to conserving the 189 habitat types and 788 species identified in Annexes I and II of the Directive (as amended). The listed habitat types and species are those considered to be most in need of conservation at a European level (excluding birds).
Special Protection Area (SPA)	SPAs are sites classified under the EU Birds Directive (Directive 2009/147/EC of the European Parliament and of the Council on the conservation of wild birds) to protect rare or vulnerable birds (as listed on Annex I of the Directive), as well as regularly occurring migratory species.
Species	A group of living organisms consisting of similar individuals capable of exchanging genes or interbreeding.
Statutory consultee	Organisations that are required to be consulted by an applicant pursuant to the Planning Act 2008 in relation to an application for development consent.
The Planning Inspectorate	The agency responsible for operating the planning process for applications for development consent under the Planning Act 2008.
The Secretary of State for Energy Security and Net Zero	The decision maker with regards to the application for development consent for the Morgan Offshore Wind Project Generation Assets.
Wind turbines	The wind turbine generators, including the tower, nacelle and rotor.

Acronyms

Acronym	Description
cSAC	Candidate Special Area of Conservation
CJEU	Court of Justice of the European Union
DCO	Development Consent Order
EC	European Commission
EIA	Environmental Impact Assessment
EnBW	Energie Baden-Württemberg
EU	European Union
EMF	Electromagnetic Field
EWG	Expert Working Group
HRA	Habitats Regulations Assessment
ISAA	Information to Support an Appropriate Assessment
LAT	Lowest Astronomical Tide
LSE	Likely Significant Effect
MDS	Maximum Design Scenario
MHWS	Mean High Water Springs

Acronym	Description
OSP	Offshore Substation Platform
PEIR	Preliminary Environmental Information Report
PINS	The Planning Inspectorate
pSAC	Possible Special Area of Conservation
pSPA	Potential Special Protection Area
SAC	Special Area of Conservation
SCI	Site of Community Interest
SNCB	Statutory Nature Conservation Bodies
SPA	Special Protection Area
TCE	The Crown Estate
UK	United Kingdom
UXO	Unexploded Ordnance

Units

Unit	Description
dB	Decibel
ha	hectares
km	Kilometres
km^2	Square kilometres
kn	knots
m	Metre
MW	Megawatt
nm	Nautical mile

1 Habitats Regulations Assessment Stage 2 Information to Support an Appropriate Assessment (ISAA) – Part 1: Introduction

1.1 Structure of the HRA Stage 2 ISAA

1.1.1.1 For clarity and ease of navigation, this HRA Stage 2 ISAA is structured in three 'Parts', as follows:

- Part 1 – Introduction (this document)
- Part 2 –Special Area of Conservation (SAC) Assessments (Document Reference E1.2)
- Part 3 – Special Protection Area (SPA) and Ramsar Sites Assessments (Document Reference E1.3).

1.1.2 Structure of this document

1.1.2.1 This document constitutes Part 1 of the HRA Stage 2 ISAA and provides an introduction and background to the Morgan Offshore Wind Project: Generation Assets (hereafter referred to as the Morgan Generation Assets) and the HRA process. The document is structured as follows:

- Section 1.2: Executive summary of the HRA Stage 2 ISAA report (all three Parts)
- Section 1.3: Introduction – this section describes the Morgan Generation Assets and establishes the need for, the purpose and structure of the ISAA
- Section 1.4: Habitats Regulations Assessment (HRA) – this section sets out the process, principles, tests, (including those established by case law) and guidance applied to the ISAA
- Section 1.5: Consultation – this section describes the scope of the Evidence Plan Process for the HRA Stage 2 ISAA, details of which are included in the ISAA Part 2 SAC Assessments (Document Reference E1.2) and the ISAA Part 3 SPA and Ramsar Sites Assessments (Document Reference E1.3).

1.2 Executive summary

1.2.1 Overview

1.2.1.1 This HRA Stage 2 ISAA report has been prepared by RPS and NIRAS, on behalf of the Applicant, to support the HRA under Section 63 of the Conservation of Habitats and Species Regulations 2017 and Section 28 of the Conservation of Offshore Marine Habitats and Species Regulations 2017 for the Morgan Generation Assets.

1.2.1.2 The HRA Stage 2 ISAA builds upon the HRA Stage 1 Screening Report (Document Reference E1.4) and considers whether the Morgan Generation Assets could have an adverse effect, either alone or in-combination with other plans or projects, on the integrity of any European site. This report will provide the Competent Authority with the information required to undertake a HRA Stage 2 Appropriate Assessment.

1.2.1.3 The scope of the HRA Stage 2 ISAA covers all relevant European sites and designated features where Likely Significant Effect (LSEs) have been identified due to the potential

for impacts arising from the Morgan Generation Assets acting either alone or in-combination with other plans and projects. This includes potential impacts of offshore infrastructure seaward of Mean High Water Springs on both 'offshore' European sites and features (seaward of Mean High Water Springs) and some 'onshore' European sites (landward of Mean Low Water Springs) designated for ornithological features. Due to the nature of the project infrastructure associated with the Morgan Generation Assets (i.e. excluding transmission assets), it was concluded within the HRA Stage 1 Screening Report that there was no potential connectivity with 'onshore' European sites designated for onshore Annex I habitats and onshore Annex II species (landward of Mean Low Water Springs). Therefore, these sites were not considered within the HRA Stage 1 Screening Report (Document Reference E1.4) or in this HRA Stage 2 ISAA.

1.2.1.4 This assessment has taken account of the best available baseline information and been undertaken in view of the measures proposed to be adopted as part of the Morgan Generation Assets to mitigate the potential for adverse effects. These assessments are presented in the HRA Stage 2 ISAA Part 2 SAC Assessments (Document Reference E1.2) and Part 3 SPA and Ramsar Sites Assessments (Document Reference E1.3).

1.2.1.5 The consideration of the potential for an Adverse Effect on the Integrity of a European site is made with reference to the overall ecological functions and the lasting preservation of the constitutive characteristics of the sites.

1.2.2 Annex II diadromous fish species and dependent features

1.2.2.1 The HRA Stage 1 Screening Report (Document Reference E1.4) identified the potential for LSE on nine SACs designated for Annex II diadromous fish species and dependent features, which have been considered in the HRA Stage 2 ISAA Part 2 – SAC assessments (Document Reference E1.2).

1.2.2.2 The conclusions of the HRA Stage 2 ISAA Part 2 – SAC assessments (Document Reference E1.2) for the European sites considered for Annex II diadromous fish and dependent features are summarised in the following paragraphs 1.2.2.3 to 1.2.2.38, in order of increasing distance from the Morgan Generation Assets.

River Ehen SAC

1.2.2.3 The River Ehen SAC is located 62.5 km from the Morgan Generation Assets and forms the outfall from Ennerdale Water and flows some 20 km to Sellafield where it meets the Irish Sea. The SAC is located between Ennerdale Water and the convergence with the River Keekle.

1.2.2.4 The HRA Stage 1 Screening Report (Document Reference E1.4) could not rule out the risk of LSE on the River Ehen SAC. The impacts of the Morgan Generation Assets have been assessed with respect to the conservation objectives of this site. Annex II diadromous fish (and dependent species) that are qualifying features of this European site, and were screened into the assessment include:

- Atlantic salmon *Salmo salar*
- Freshwater pearl mussel *Margaritifera margaritifera*.

1.2.2.5 The HRA Stage 2 ISAA Part 2 – SAC assessments (Document Reference E1.2) assessed the following impacts for Annex II diadromous fish (and dependent species):

- Underwater sound impacting fish and shellfish receptors (construction/decommissioning)
- Electromagnetic Field (EMF) from subsea electric cables (operations and maintenance)
- In-combination effects (construction/decommissioning and operations /maintenance).

1.2.2.6 Based on the evidence detailed in the HRA Stage 2 ISAA Part 2 – SAC assessments (Document Reference E1.2), Section 1.5: Assessment of potential Adverse Effect on Integrity: Annex II diadromous fish species, the assessment concluded that the conservation objectives for the site would not be undermined and there would be no Adverse Effect on the Integrity of the River Ehen SAC as a result of the Morgan Generation Assets alone, or in combination with other plans and projects.

Dee Estuary/Aber Dyfrdwy SAC

1.2.2.7 The Dee Estuary Aber Dyfrdwy SAC is located 70.1 km from the Morgan Generation Assets. River lamprey *Lampetra fluviatilis* and sea lamprey *Petromyzon marinus*, which migrate through the SAC, are Annex II species present as qualifying features, but are not a primary reason for selection of the SAC.

1.2.2.8 The HRA Stage 1 Screening Report (Document Reference E1.4) could not rule out the risk of LSE on the Dee Estuary/Aber Dyfrdwy SAC. The impacts of the Morgan Generation Assets have been assessed with respect to the conservation objectives of this site. Annex II diadromous fish that are qualifying features of this European site, and were screened into the assessment include:

- Sea lamprey *Petromyzon marinus*
- River lamprey *Lampetra fluviatilis*.

1.2.2.9 The HRA Stage 2 ISAA Part 2 – SAC assessments (Document Reference E1.2) assessed the following impacts for Annex II diadromous fish:

- Underwater sound impacting fish and shellfish receptors (construction/decommissioning)
- EMF from subsea electric cables (operations and maintenance)
- In-combination effects (construction/decommissioning and operations and maintenance).

1.2.2.10 Based on the evidence detailed in the HRA Stage 2 ISAA Part 2 SAC assessments (Document Reference E1.2), Section 1.5: Assessment of potential Adverse Effect on integrity: Annex II diadromous fish species, the assessment concluded that the conservation objectives for the site would not be undermined and there would be no Adverse Effect on the Integrity of the Dee Estuary/Aber Dyfrdwy SAC as a result of the Morgan Generation Assets alone, or in combination with other plans and projects.

River Derwent and Bassenthwaite Lake SAC

1.2.2.11 The River Derwent and Bassenthwaite SAC is located 71.2 km from the Morgan Generation Assets. Designated fish species present within the SAC include Atlantic salmon, sea lamprey and river lamprey, which are all a primary reason for the selection of the SAC.

1.2.2.12 The HRA Stage 1 Screening Report (Document Reference E1.4) could not rule out the risk of LSE on the River Derwent and Bassenthwaite Lake SAC. The impacts of the Morgan Generation Assets have been assessed with respect to the conservation objectives of this site. Annex II diadromous fish that are qualifying features of this European site, and were screened into the assessment include:

- Atlantic salmon *Salmo salar*
- Sea lamprey *Petromyzon marinus*
- River lamprey *Lampetra fluviatilis*.

1.2.2.13 The HRA Stage 2 ISAA Part 2– SAC assessments (Document Reference E1.2) assessed the following impacts for Annex II diadromous fish:

- Underwater sound impacting fish and shellfish receptors (construction/decommissioning)
- EMF from subsea electric cables (operations and maintenance)
- In-combination effects (construction/decommissioning and operations /maintenance).

1.2.2.14 Based on the evidence detailed in the HRA Stage 2 ISAA Part 2 SAC assessments (Document Reference E1.2), Section 1.5: Assessment of potential Adverse Effect on Integrity: Annex II diadromous fish species, the assessment concluded that the conservation objectives for the site would not be undermined and there would be no Adverse Effect on the Integrity of the River Derwent and Bassenthwaite Lake SAC as a result of the Morgan Generation Assets alone, or in combination with other plans and projects.

River Kent SAC

1.2.2.15 The River Kent SAC is located 80.9 km from the Morgan Generation Assets. The high water quality, fast flow regime, cool temperatures and suitable areas of habitat provide sufficient habitat for freshwater pearl mussels found primarily in one of the upper tributaries and also present as a qualifying feature of the SAC, but not a primary reason for site selection (Natural England, 2005b).

1.2.2.16 The HRA Stage 1 Screening Report (Document Reference E1.4) could not rule out the risk of LSE on the River Kent SAC. The impacts of the Morgan Generation Assets have been assessed with respect to the conservation objectives of this site. The following qualifying feature of this European site was screened into assessment:

- Freshwater pearl mussel *Margaritifera margaritifera*.

1.2.2.17 The HRA Stage 2 ISAA Part 2 – SAC assessments (Document Reference E1.2) assessed the following impacts for Annex II diadromous fish:

- Underwater sound impacting fish and shellfish receptors (construction/decommissioning)
- EMF from subsea electric cables (operations and maintenance)
- In-combination effects (construction/decommissioning and operations and maintenance).

1.2.2.18 Based on the evidence detailed in the HRA Stage 2 ISAA Part 2 SAC assessments (Document Reference E1.2), Section 1.5: Assessment of potential Adverse Effect on Integrity: Annex II diadromous fish species, the assessment concluded that the conservation objectives for the site would not be undermined and there would be no

Adverse Effect on the Integrity of the River Kent SAC as a result of the Morgan Generation Assets alone, or in combination with other plans and projects.

Solway Firth SAC

1.2.2.19 The Solway Firth SAC is located 84.7 km from the Morgan Generation Assets. The Solway is a large, complex estuary with moderately strong tidal streams and wave action (Natural England, 2005a). The estuary provides a migratory passage for sea lamprey and river lamprey to and from their spawning and nursery grounds, which are present as qualifying features and primary reasons for the selection of the SAC (Natural England, 2005a).

1.2.2.20 The HRA Stage 1 Screening Report (Document Reference E1.4) could not rule out the risk of LSE on the Solway Firth SAC. The impacts of the Morgan Generation Assets have been assessed with respect to the conservation objectives of this site. Annex II diadromous fish that are qualifying features of this European site and were screened into the assessment include:

- Sea lamprey *Petromyzon marinus*
- River lamprey *Lampetra fluviatilis*.

1.2.2.21 The HRA Stage 2 ISAA Part 2– SAC assessments (Document Reference E1.2) assessed the following impacts for Annex II diadromous fish:

- Underwater sound impacting fish and shellfish receptors (construction/decommissioning)
- EMF from subsea electric cables (operations and maintenance)
- In-combination effects (construction/decommissioning and operations /maintenance).

1.2.2.22 Based on the evidence detailed in the HRA Stage 2 ISAA Part 2 SAC assessments (Document Reference E1.2), Section 1.5: Assessment of potential Adverse Effect on Integrity: Annex II diadromous fish species, the assessment concluded that the conservation objectives for the site would not be undermined and there would be no Adverse Effect on the Integrity of the Solway Firth SAC as a result of the Morgan Generation Assets alone, or in combination with other plans and projects.

River Bladnoch SAC

1.2.2.23 The River Bladnoch SAC is located 89.8 km from the Morgan Generation Assets. The River Bladnoch flows from Mayberry Loch in South Ayrshire for seven miles to Wigtown Bay. The River Bladnoch is designated for Atlantic salmon (present as a primary reason for the selection of the site) and the site supports a high-quality salmon population and a spring run of salmon (JNCC, 2022d).

1.2.2.24 HRA Stage 1 Screening Report (Document Reference E1.4) could not rule out the risk of LSE on the River Bladnoch SAC. The impacts of the Morgan Generation Assets have been assessed with respect to the conservation objectives of this site. Annex II diadromous fish that are qualifying features of this European site, and were screened into the assessment include:

- Atlantic salmon *Salmo salar*.

1.2.2.25 The HRA Stage 2 ISAA Part 2– SAC assessments (Document Reference E1.2) assessed the following impacts for Annex II diadromous fish:

- Underwater sound impacting fish and shellfish receptors (construction/decommissioning)
- EMF from subsea electric cables (operations and maintenance)
- In-combination effects (construction/decommissioning and operations and maintenance).

1.2.2.26 Based on the evidence detailed in the HRA Stage 2 ISAA Part 2 SAC assessments (Document Reference E1.2), Section 1.5: Assessment of potential Adverse Effect on Integrity: Annex II diadromous fish species, the assessment concluded that the conservation objectives for the site would not be undermined and there would be no Adverse Effect on the Integrity of the River Bladnoch SAC as a result of the Morgan Generation Assets alone, or in combination with other plans and projects.

River Dee and Bala Lake/Afon Dyfrdwy a Llyn Tegid SAC

1.2.2.27 The River Dee and Bala Lake/Afon Dyfrdwy a Llyn Tegid SAC, which is 71.2 km from the Morgan Generation Assets, extends from Llyn Tegid encompassing the Bala lake and its banks and outfalls into the River Dee. Atlantic salmon are a primary reason for the selection of the River Dee and Bala Lake SAC, with the Mynach, Meloch and Ceiriog tributaries being the most prevalent salmon spawning tributaries in the Dee catchment. Other diadromous fish species present as qualifying features of the site are river lamprey and sea lamprey present as qualifying features but not a primary reason for site selection.

1.2.2.28 The HRA Stage 1 Screening Report (Document Reference E1.4) could not rule out the risk of LSE on the River Dee and Bala Lake/Afon Dyfrdwy a Llyn Tegid SAC. The impacts of the Morgan Generation Assets have been assessed with respect to the conservation objectives of this site. Annex II diadromous fish that are qualifying features of this European site, and were screened into the assessment include:

- Atlantic salmon *Salmo salar*
- Sea lamprey *Petromyzon marinus*
- River lamprey *Lampetra fluviatilis*.

1.2.2.29 The HRA Stage 2 ISAA Part 2– SAC assessments (Document Reference E1.2) assessed the following impacts for Annex II diadromous fish:

- Underwater sound impacting fish and shellfish receptors (construction/decommissioning)
- EMF from subsea electric cables (operations and maintenance)
- In-combination effects (construction/decommissioning and operations /maintenance).

1.2.2.30 Based on the evidence detailed in the HRA Stage 2 ISAA Part 2 SAC assessments (Document Reference E1.2), Section 1.5: Assessment of potential Adverse Effect on Integrity: Annex II diadromous fish species, the assessment concluded that the conservation objectives for the site would not be undermined and there would be no Adverse Effect on the Integrity of the River Dee and Bala Lake/Afon Dyfrdwy a Llyn Tegid SAC as a result of the Morgan Generation Assets alone, or in combination with other plans and projects.

Afon Gwyrfai a Llyn Cwellyn SAC

1.2.2.31 The Afon Gwyrfai a Llyn Cwellyn SAC is located 117.9 km from the Morgan Generation Assets. This SAC encompasses the Afon Gwyrfai and Llyn Cwellyn. The Gwyrfai river system is recognised for outstanding ecological and water quality and is designated for an extensive Atlantic salmon population (the primary reason for selection of the site), one of the best supporting rivers in the United Kingdom (Countryside Council for Wales, 2008).

1.2.2.32 The HRA Stage 1 Screening Report (Document Reference E1.4) could not rule out the risk of LSE on the Afon Gwyrfai a Llyn Cwellyn SAC. The impacts of the Morgan Generation Assets have been assessed with respect to the conservation objectives of this site. Annex II diadromous fish that are qualifying features of this European site, and were screened into the assessment include:

- Atlantic salmon *Salmo salar*.

1.2.2.33 The HRA Stage 2 ISAA Part 2– SAC assessments (Document Reference E1.2) assessed the following impacts for Annex II diadromous fish:

- Underwater sound impacting fish and shellfish receptors (construction/decommissioning)
- EMF from subsea electric cables (operations and maintenance)
- In-combination effects (construction/decommissioning and operations/ maintenance).

1.2.2.34 Based on the evidence detailed in the HRA Stage 2 ISAA Part 2 SAC assessments (Document Reference E1.2), Section 1.5: Assessment of potential Adverse Effect on Integrity: Annex II diadromous fish species, the assessment concluded that the conservation objectives for the site would not be undermined and there would be no Adverse Effect on the Integrity of the Afon Gwyrfai a Llyn Cwellyn SAC as a result of the Morgan Generation Assets alone, or in combination with other plans and projects.

River Eden SAC

1.2.2.35 The River Eden SAC is located 125.6 km from the Morgan Generation Assets. Atlantic salmon, sea lamprey and river lamprey are all present as qualifying features that are the primary reason for selection of the site.

1.2.2.36 The HRA Stage 1 Screening Report (Document Reference E1.4) could not rule out the risk of LSE on the River Eden SAC. The impacts of the Morgan Generation Assets have been assessed with respect to the conservation objectives of this site. Annex II diadromous fish that are qualifying features of this European site, and were screened into the assessment include:

- Atlantic salmon *Salmo salar*
- Sea lamprey *Petromyzon marinus*
- River lamprey *Lampetra fluviatilis*.

1.2.2.37 The HRA Stage 2 ISAA Part 2– SAC assessments (Document Reference E1.2) assessed the following impacts for Annex II diadromous fish:

- Underwater sound impacting fish and shellfish receptors (construction/decommissioning)
- EMF from subsea electric cables (operations and maintenance)

- In-combination effects (construction/decommissioning and operations and maintenance).

1.2.2.38 Based on the evidence detailed in the HRA Stage 2 ISAA Part 2 SAC assessments (Document Reference E1.2), Section 1.5: Assessment of potential Adverse Effect on Integrity: Annex II diadromous fish species, the assessment concluded that the conservation objectives for the site would not be undermined and there would be no Adverse effect on the integrity of the River Eden SAC as a result of the Morgan Generation Assets alone, or in combination with other plans and projects.

1.2.3 Annex II marine mammals

1.2.3.1 The HRA Stage 1 Screening Report (Document Reference E1.4) identified the potential for LSEs on the qualifying Annex II marine mammal features of all European sites within the same MU, (OSPAR Region III for grey seals) as the Morgan Generation Assets. For harbour porpoise, bottlenose dolphin and harbour seal the Celtic and Irish Seas MU, Irish Seas MU and Wales and North West England MU were used, respectively. Therefore, 33 European sites were considered in the HRA Stage 2 ISAA Part 2 – SAC assessments (Document Reference E1.2), 12 sites in the United Kingdom, four sites in Ireland, and 17 sites in France.

1.2.3.2 As outlined in detail in the HRA Stage 2 ISAA Part 2 – SAC assessments (Document Reference E1.2), for European sites located exclusively in Welsh, Irish or French waters an iterative approach has been followed, whereby a conclusion for the potential for an Adverse Effect on Integrity has been provided for each site based on the distance from the Morgan Generation Assets.

1.2.3.3 The conclusions of the HRA Stage 2 ISAA Part 2 - SAC assessments (Document Reference E1.2) for the European sites considered for Annex II marine mammals are summarised in the following paragraphs 1.2.3.4 to 1.2.3.60 in order of increasing distance from the Morgan Generation Assets.

North Anglesey Marine/Gogledd Môn Forol SAC

1.2.3.4 The North Anglesey Marine/Gogledd Môn Forol SAC is located 28.2 km away from the Morgan Generation Assets. The North Anglesey Marine/Gogledd Môn Forol SAC covers an area of 3,249 km^2 and extends from Anglesey in a northwest direction into the Irish Sea.

1.2.3.5 The HRA Stage 1 Screening Report (Document Reference E1.4) could not rule out the risk of LSE on the North Anglesey Marine/Gogledd Môn Forol SAC. The impacts of the Morgan Generation Assets have been assessed with respect to the conservation objectives of this site. Annex II marine mammals that are qualifying features of this European site, and were screened into the assessment include:

- Harbour porpoise *Phocoena phocoena*.

1.2.3.6 The HRA Stage 2 ISAA Part 2 – SAC assessments (Document Reference E1.2) assessed the following impacts:

- Injury and disturbance from elevated underwater sound during piling (construction/decommissioning)
- Injury and disturbance from elevated underwater sound during Unexploded Ordnance (UXO) clearance (construction/decommissioning)
- Injury and disturbance from elevated underwater sound during pre-construction site investigation surveys (construction/decommissioning)

- Injury and disturbance from elevated underwater sound due to vessel use and other (non-piling) sound producing activities (all phases)
- Changes in fish and shellfish communities affecting prey availability (construction)
- In-combination effects (all phases).

1.2.3.7 Based on the evidence detailed in the HRA Stage 2 ISAA Part 2 – SAC assessments (Document Reference E1.2), Section 1.6: Assessment of potential Adverse Effect on Integrity: Annex II marine mammals, the assessment concluded that the conservation objectives for the site would not be undermined and there would be no Adverse Effect on the Integrity of the North Anglesey Marine/Gogledd Môn Forol SAC as a result of the Morgan Generation Assets alone, or in combination with other plans and projects.

North Channel SAC

1.2.3.8 The North Channel SAC, which is 64.0 km away from the Morgan Generation Assets, is located in between the North Channel and the northwest Irish Sea between Northern Ireland, Scotland and the Isle of Man and covers an area of 1,604 km^2. The SAC runs along the east coast of Northern Ireland, connects with the Maidens SAC to the north and stands in proximity to the Murlough SAC and Strangford Lough SAC to the southwest.

1.2.3.9 The HRA Stage 1 Screening Report (Document Reference E1.4) could not rule out the risk of LSE on the North Channel SAC. The impacts of the Morgan Generation Assets have been assessed with respect to the conservation objectives of this site. Annex II marine mammals that are qualifying features of this European site, and were screened into the assessment include:

- Harbour porpoise *Phocoena phocoena*.

1.2.3.10 The HRA Stage 2 ISAA Part 2– SAC assessments (Document Reference E1.2) assessed the following impacts:

- Injury and disturbance from elevated underwater sound during piling (construction/decommissioning)
- Injury and disturbance from elevated underwater sound during UXO clearance (construction/decommissioning)
- Injury and disturbance from elevated underwater sound during pre-construction site investigation surveys (construction/decommissioning)
- Injury and disturbance from elevated underwater sound due to vessel use and other (non-piling) sound producing activities (all phases)
- In-combination effects (all phases).

1.2.3.11 Based on the evidence detailed in the HRA Stage 2 ISAA Part 2 – SAC assessments (Document Reference E1.2), Section 1.6: Assessment of potential Adverse Effect on Integrity: Annex II marine mammals, the assessment concluded that the conservation objectives for the site would not be undermined and there would be no Adverse Effect on the Integrity of the North Channel SAC as a result of the Morgan Generation Assets alone, or in combination with other plans and projects.

Strangford Lough SAC

1.2.3.12 The Strangford Lough SAC is located 94.7 km away from Morgan Generation Assets and 15 km east of central Belfast, running to Downpatrick in the southwest corner of Northern Ireland. The lough is a large marine inlet spanning 150 km^2 on the east coast of County Down, of which about 50 km^2 lies between high water mark mean tide and low water mark mean tide.

1.2.3.13 The HRA Stage 1 Screening Report (Document Reference E1.4) could not rule out the risk of LSE on the Strangford Lough SAC. The impacts of the Morgan Generation Assets have been assessed with respect to the conservation objectives of this site. Annex II marine mammals that are qualifying features of this European site, and were screened into the assessment include:

- Harbour seal *Phoca vitulina*.

1.2.3.14 The HRA Stage 2 ISAA Part 2– SAC assessments (Document Reference E1.2) assessed the following impacts:

- Injury and disturbance from elevated underwater sound during piling (construction/decommissioning)
- Injury and disturbance from elevated underwater sound during UXO clearance (construction/decommissioning)
- Injury and disturbance from elevated underwater sound during pre-construction site investigation surveys (construction/decommissioning)
- Injury and disturbance from elevated underwater sound due to vessel use and other (non-piling) sound producing activities (all phases)
- In-combination effects (all phases).

1.2.3.15 Based on the evidence detailed in the HRA Stage 2 ISAA Part 2 – SAC assessments (Document Reference E1.2), Section 1.6: Assessment of potential Adverse Effect on Integrity: Annex II marine mammals, the assessment concluded that the conservation objectives for the site would not be undermined and there would be no Adverse Effect on the Integrity of Strangford Lough SAC as a result of the Morgan Generation Assets alone, or in combination with other plans and projects.

Murlough SAC

1.2.3.16 The Murlough SAC is located 98.4 km away from the Morgan Generation Assets, on the southeast coast of Northern Ireland. The Murlough SAC spans over 119 km^2 in the northwest Irish Sea.

1.2.3.17 The HRA Stage 1 Screening Report (Document Reference E1.4) could not rule out the risk of LSE on the Murlough SAC. The impacts of the Morgan Generation Assets have been assessed with respect to the conservation objectives of this site. Annex II marine mammals that are qualifying features of this European site, and were screened into the assessment include:

- Harbour seal *Phoca vitulina*.

1.2.3.18 The HRA Stage 2 ISAA Part 2– SAC assessments (Document Reference E1.2) assessed the following impacts:

- Injury and disturbance from elevated underwater sound during piling (construction/decommissioning)
- Injury and disturbance from elevated underwater sound during UXO clearance (construction/decommissioning)
- Injury and disturbance from elevated underwater sound during pre-construction site investigation surveys (construction/decommissioning)
- Injury and disturbance from elevated underwater sound due to vessel use and other (non-piling) sound producing activities (all phases)
- In-combination effects (all phases).

1.2.3.19 Based on the evidence detailed in the HRA Stage 2 ISAA Part 2 – SAC assessments (Document Reference E1.2), Section 1.6: Assessment of potential Adverse Effect on Integrity: Annex II marine mammals, the assessment concluded that the conservation objectives for the site would not be undermined and there would be no Adverse Effect on the Integrity of Murlough SAC as a result of the Morgan Generation Assets alone, or in combination with other plans and projects.

Lleyn Peninsula and the Sarnau/Pen Llyn a`r Sarnau SAC

1.2.3.20 The Pen Llŷn a'r Sarnau SAC is located 119.7 km away from the Morgan Generation Assets, in northwest Wales and extends from Nefyn on the north coast of the Llŷn Peninsula along the Meirionnydd coast to Clarach in Ceredigion south of the Dyfi estuary (NRW, 2018d). The site covers an area of about 146,023 ha (NRW, 2018d).

1.2.3.21 The HRA Stage 1 Screening Report (Document Reference E1.4) could not rule out the risk of LSE on the Lleyn Peninsula and the Sarnau/Pen Llyn a`r Sarnau SAC. The impacts of the Morgan Generation Assets have been assessed with respect to the conservation objectives of this site. Annex II marine mammals that are qualifying features of this European site, and were screened into the assessment include:

- Bottlenose dolphin *Tursiops truncatus*
- Grey seal *Halichoerus grypus*.

1.2.3.22 The HRA Stage 2 ISAA Part 2 – SAC assessments (Document Reference E1.2) assessed the following impacts for both features:

- Injury and disturbance from elevated underwater sound during piling (construction/decommissioning)
- Injury and disturbance from elevated underwater sound during UXO clearance (construction/decommissioning)
- Injury and disturbance from elevated underwater sound during pre-construction site investigation surveys (construction/decommissioning)
- Injury and disturbance from elevated underwater sound due to vessel use and other (non-piling) sound producing activities (all phases)
- In-combination effects (all phases).

1.2.3.23 Based on the evidence detailed in the HRA Stage 2 ISAA Part 2 – SAC assessments (Document Reference E1.2), Section 1.6: Assessment of potential Adverse Effect on Integrity: Annex II marine mammals, the assessment concluded that the conservation

objectives for the site would not be undermined and there would be no Adverse Effect on the Integrity of the Lleyn Peninsula and the Sarnau/Pen Llyn a`r Sarnau SAC as a result of the Morgan Generation Assets alone, or in-combination with other plans and projects.

West Wales Marine/Gorllewin Cymru Forol SAC

1.2.3.24 The West Wales Marine/Gorllewin Cymru Forol SAC is located 121.15 km from the Morgan Generation Assets and extends from the tip of the Llŷn Peninsula southwards across much of Cardigan Bay to the Pembrokeshire coast. The site is recognised as an area with the top 10% predicted persistent high densities of harbour porpoise (NRW and JNCC, 2015).

1.2.3.25 The HRA Stage 1 Screening Report (Document Reference E1.4) could not rule out the risk of LSE on the West Wales Marine/Gorllewin Cymru Forol SAC. The impacts of the Morgan Generation Assets have been assessed with respect to the conservation objectives of this site. Annex II marine mammals that are qualifying features of this European site, and were screened into the assessment include:

- Harbour porpoise *Phocoena phocoena*.

1.2.3.26 The HRA Stage 2 ISAA Part 2– SAC assessments (Document Reference E1.2) assessed the following impacts:

- Injury and disturbance from elevated underwater sound during piling (construction/decommissioning)
- Injury and disturbance from elevated underwater sound during UXO clearance (construction/decommissioning)
- Injury and disturbance from elevated underwater sound during pre-construction site investigation surveys (construction/decommissioning)
- Injury and disturbance from elevated underwater sound due to vessel use and other (non-piling) sound producing activities (all phases)
- In-combination effects (all phases).

1.2.3.27 Based on the evidence detailed in the HRA Stage 2 ISAA Part 2 – SAC assessments (Document Reference E1.2), Section 1.6: Assessment of potential Adverse Effect on Integrity: Annex II marine mammals, the assessment concluded that the conservation objectives for the site would not be undermined and there would be no Adverse Effect on the Integrity of the West Wales Marine/Gorllewin Cymru Forol SAC as a result of the Morgan Generation Assets alone, or in combination with other plans and projects.

The Maidens SAC

1.2.3.28 The Maidens SAC is located 142 km away from Morgan Generation Assets, and in the North Channel to the northeast coast of Northern Ireland. The SAC extends over 74.6 km^2 and ranges between Mean High Water and 200 m deep and can experience currents of up to 4 kn.

1.2.3.29 The HRA Stage 1 Screening Report (Document Reference E1.4) could not rule out the risk of LSE on The Maidens SAC. The impacts of the Morgan Generation Assets have been assessed with respect to the conservation objectives of this site. Annex II marine mammals that are qualifying features of this European site, and were screened into the assessment include:

- Grey seal *Halichoerus grypus*.

1.2.3.30 The HRA Stage 2 ISAA Part 2– SAC assessments (Document Reference E1.2) assessed the following impacts:

- Injury and disturbance from elevated underwater sound during piling (construction/decommissioning)
- Injury and disturbance from elevated underwater sound during UXO clearance (construction/decommissioning)
- Injury and disturbance from elevated underwater sound during pre-construction site investigation surveys (construction/decommissioning)
- Injury and disturbance from elevated underwater sound due to vessel use and other (non-piling) sound producing activities (all phases)
- In-combination effects (all phases).

1.2.3.31 Based on the evidence detailed in the HRA Stage 2 ISAA Part 2 – SAC assessments (Document Reference E1.2), Section 1.6: Assessment of potential Adverse Effect on Integrity: Annex II marine mammals, the assessment concluded that the conservation objectives for the site would not be undermined and there would be no Adverse Effect on the Integrity of The Maidens SAC as a result of the Morgan Generation Assets Project alone, or in combination with other plans and projects.

Cardigan Bay/Bae Ceredigion SAC

1.2.3.32 The Cardigan Bay/Bae Ceredigion SAC is located 188.1 km from the Morgan Generation Assets, is located off the north Pembrokeshire coast in the south region of Cardigan Bay. The SAC encompasses approximately 960 km^2 and extends 12 miles offshore.

1.2.3.33 The HRA Stage 1 Screening Report (Document Reference E1.4) could not rule out the risk of LSE on the Cardigan Bay/Bae Ceredigion SAC. The impacts of the Morgan Generation Assets have been assessed with respect to the conservation objectives of this site. Annex II marine mammals that are qualifying features of this European site, and were screened into the assessment include:

- Bottlenose dolphin *Tursiops truncatus*
- Grey seal *Halichoerus grypus*.

1.2.3.34 The HRA Stage 2 ISAA Part 2– SAC assessments (Document Reference E1.2) assessed the following impacts:

- Injury and disturbance from elevated underwater sound during piling (construction/decommissioning)
- Injury and disturbance from elevated underwater sound during UXO clearance (construction/decommissioning)
- Injury and disturbance from elevated underwater sound during pre-construction site investigation surveys (construction/decommissioning)
- Injury and disturbance from elevated underwater sound due to vessel use and other (non-piling) sound producing activities (all phases)
- In-combination effects (all phases).

1.2.3.35 Based on the evidence detailed in the HRA Stage 2 ISAA Part 2 – SAC assessments (Document Reference E1.2), Section 1.6: Assessment of potential Adverse Effect on Integrity: Annex II marine mammals, the assessment concluded that the conservation

objectives for the site would not be undermined and there would be no Adverse Effect on the Integrity of the Cardigan Bay/Bae Ceredigion SAC as a result of the Morgan Generation Assets alone, or in-combination with other plans and projects.

Pembrokeshire Marine/Sir Benfro Forol SAC

1.2.3.36 The Pembrokeshire Marine/Sir Benfro Forol SAC is located 237.3 km from the Morgan Generation Assets and extends from north of Abereiddy on the north Pembrokeshire coast to the east of Manorbier in the south and encompasses the coasts of the islands of Ramsey, Skomer, Grassholm, Skokholm, the Bishops and Clerks and The Smalls.

1.2.3.37 The HRA Stage 1 Screening Report (Document Reference E1.4) could not rule out the risk of LSE on the Pembrokeshire Marine/Sir Benfro Forol SAC. The impacts of the Morgan Generation Assets have been assessed with respect to the conservation objectives of this site. Annex II marine mammals that are qualifying features of this European site, and were screened into the assessment include:

- Grey seal *Halichoerus grypus*.

1.2.3.38 The HRA Stage 2 ISAA Part 2– SAC assessments (Document Reference E1.2) assessed the following impacts:

- Injury and disturbance from elevated underwater sound during piling (construction/decommissioning)
- Injury and disturbance from elevated underwater sound during UXO clearance (construction/decommissioning)
- Injury and disturbance from elevated underwater sound during pre-construction site investigation surveys (construction/decommissioning)
- Injury and disturbance from elevated underwater sound due to vessel use and other (non-piling) sound producing activities (all phases)
- In-combination effects (all phases).

1.2.3.39 Based on the evidence detailed in the HRA Stage 2 ISAA Part 2 – SAC assessments (Document Reference E1.2), Section 1.6: Assessment of potential Adverse Effect on Integrity: Annex II marine mammals, the assessment concluded that the conservation objectives for the site would not be undermined and there would be no Adverse Effect on the Integrity of the Pembrokeshire Marine/Sir Benfro Forol SAC as a result of the Morgan Generation Assets alone, or in combination with other plans and projects.

Bristol Channel Approaches/Dynesfeydd Môr Hafren SAC

1.2.3.40 The Bristol Channel Approaches/Dynesfeydd Môr Hafren SAC is located 300.5 km away from the Morgan Generation Assets and is located in English and Welsh waters to the east of the Celtic Sea in the Bristol Channel. The SAC extends from the north coast of Cornwall in England to Carmarthen Bay in Wales and covers an area of 5,850 km^2.

1.2.3.41 The HRA Stage 1 Screening Report (Document Reference E1.4) could not rule out the risk of LSE on the Bristol Channel Approaches/Dynesfeydd Môr Hafren SAC. The impacts of the Morgan Generation Assets have been assessed with respect to the conservation objectives of this site. Annex II marine mammals that are qualifying features of this European site, and were screened into the assessment include:

- Harbour porpoise *Phocoena phocoena*.

1.2.3.42 The HRA Stage 2 ISAA Part 2– SAC assessments (Document Reference E1.2) assessed the following impacts:

- Injury and disturbance from elevated underwater sound during piling (construction/decommissioning)
- Injury and disturbance from elevated underwater sound during UXO clearance (construction/decommissioning)
- Injury and disturbance from elevated underwater sound during pre-construction site investigation surveys (construction/decommissioning)
- Injury and disturbance from elevated underwater sound due to vessel use and other (non-piling) sound producing activities (all phases)
- In-combination effects (all phases).

1.2.3.43 Based on the evidence detailed in the HRA Stage 2 ISAA Part 2 – SAC assessments (Document Reference E1.2), Section 1.6: Assessment of potential Adverse Effect on Integrity: Annex II marine mammals, the assessment concluded that the conservation objectives for the site would not be undermined and there would be no Adverse Effect on the Integrity of the Bristol Channel Approaches/Dynesfeydd Môr Hafren SAC as a result of the Morgan Generation Assets alone, or in combination with other plans and projects.

Lundy SAC

1.2.3.44 The Lundy SAC is located 335.1 km from Morgan Generation Assets and is located in the outer Bristol Channel off the north Devon coast and covers an area of 30.7 km^2 around the small rocky island of Lundy. The site supports important granite reef habitats that are biologically extremely rich.

1.2.3.45 The HRA Stage 1 Screening Report (Document Reference E1.4) could not rule out the risk of LSE on the Lundy SAC. The impacts of the Morgan Generation Assets have been assessed with respect to the conservation objectives of this site. Annex II marine mammals that are qualifying features of this European site, and were screened into the assessment include:

- Grey seal *Halichoerus grypus*.

1.2.3.46 The HRA Stage 2 ISAA Part 2– SAC assessments (Document Reference E1.2) assessed the following impacts:

- Injury and disturbance from elevated underwater sound during piling (construction/decommissioning)
- Injury and disturbance from elevated underwater sound during UXO clearance (construction/decommissioning)
- Injury and disturbance from elevated underwater sound during pre-construction site investigation surveys (construction/decommissioning)
- Injury and disturbance from elevated underwater sound due to vessel use and other (non-piling) sound producing activities (all phases)
- In-combination effects (all phases).

1.2.3.47 Based on the evidence detailed in the HRA Stage 2 ISAA Part 2 – SAC assessments (Document Reference E1.2), Section 1.6: Assessment of potential Adverse Effect on Integrity: Annex II marine mammals, the assessment concluded that the conservation objectives for the site would not be undermined and there would be no Adverse Effect

on the Integrity of the Lundy SAC as a result of the Morgan Generation Assets alone, or in combination with other plans and projects.

Isles of Scilly Complex SAC

1.2.3.48 The Isles of Scilly Complex is located 464.9 km away from Morgan Generation Assets, and spans over 268.5 km^2 in the Atlantic Ocean 40 km southwest of Cornwall (England). The SAC surrounds the Isles of Scilly archipelago and supports extensive areas of intertidal and subtidal sandflats which host an exceptionally rich biodiversity.

1.2.3.49 The HRA Stage 1 Screening Report (Document Reference E1.4) could not rule out the risk of LSE on the Isles of Scilly Complex SAC. The impacts of the Morgan Generation Assets have been assessed with respect to the conservation objectives of this site. Annex II marine mammals that are qualifying features of this European site, and were screened into the assessment include:

- Grey seal *Halichoerus grypus*.

1.2.3.50 The HRA Stage 2 ISAA Part 2– SAC assessments (Document Reference E1.2) assessed the following impacts:

- Injury and disturbance from elevated underwater sound during piling (construction/decommissioning)
- Injury and disturbance from elevated underwater sound during UXO clearance (construction/decommissioning)
- Injury and disturbance from elevated underwater sound during pre-construction site investigation surveys (construction/decommissioning)
- Injury and disturbance from elevated underwater sound due to vessel use and other (non-piling) sound producing activities (all phases)
- In-combination effects (all phases).

1.2.3.51 Based on the evidence detailed in the HRA Stage 2 ISAA Part 2 – SAC assessments (Document Reference E1.2), Section 1.6: Assessment of potential Adverse Effect on Integrity: Annex II marine mammals, the assessment concluded that the conservation objectives for the site would not be undermined and there would be no Adverse Effect on the Integrity of the Isles of Scilly Complex SAC as a result of the Morgan Generation Assets alone, or in combination with other plans and projects.

Rockabill to Dalkey Island SAC

1.2.3.52 The Rockabill to Dalkey Island SAC is located 123.4 km from the Generation Asset, located off the coast of Eastern Ireland, in the Republic of Ireland. The site includes a range of dynamic sandy, muddy seabed, reefs, sandbanks and islands, and extends southwards, in a strip approximately 7 km wide and 40 km in length.

1.2.3.53 The HRA Stage 1 Screening Report (Document Reference E1.4) could not rule out the risk of LSE on the Rockabill to Dalkey Island SAC. The impacts of the Morgan Generation Assets have been assessed in line with the iterative approach outlined in paragraph 1.2.3.2. Annex II marine mammals that are qualifying features of this European site, and were screened into the assessment include:

- Harbour porpoise *Phocoena phocoena*.

1.2.3.54 The HRA Stage 2 ISAA Part 2– SAC assessments (Document Reference E1.2) assessed the following impacts:

- Injury and disturbance from elevated underwater sound during piling (construction/decommissioning)
- Injury and disturbance from elevated underwater sound during UXO clearance (construction/decommissioning)
- Injury and disturbance from elevated underwater sound during pre-construction site investigation surveys (construction/decommissioning)
- Injury and disturbance from elevated underwater sound due to vessel use and other (non-piling) sound producing activities (all phases)
- In-combination effects (all phases).

1.2.3.55 Based on the evidence detailed in the HRA Stage 2 ISAA Part 2 – SAC assessments (Document Reference E1.2), Section 1.6: Assessment of potential Adverse Effect on Integrity: Annex II marine mammals, the assessment concluded that the conservation objectives for the site would not be undermined and there would be no Adverse Effect on the Integrity of Rockabill to Dalkey Island SAC as a result of the Morgan Generation Assets alone, or in combination with other plans and projects.

Saltee Islands SAC

1.2.3.56 The Saltee Islands SAC is located 259.5 km from the Morgan Generation Assets, off the southern coast of County Wexford in the Republic of Ireland. The site comprises the Saltee Islands and a large area of the surrounding seas. As a group of islands, they constitute a broken reef that protrudes from a seabed of sand and shell.

1.2.3.57 The HRA Stage 1 Screening Report (Document Reference E1.4) could not rule out the risk of LSE on the Saltee Islands SAC. The impacts of the Morgan Generation Assets have been assessed in line with the iterative approach outlined in paragraph 1.2.3.2. Annex II marine mammals that are qualifying features of this European site, and were screened into the assessment include:

- Grey seal *Halichoerus grypus*.

1.2.3.58 The HRA Stage 2 ISAA Part 2– SAC assessments (Document Reference E1.2) assessed the following impacts:

- Injury and disturbance from elevated underwater sound during piling (construction/decommissioning)
- Injury and disturbance from elevated underwater sound during UXO clearance (construction/decommissioning)
- Injury and disturbance from elevated underwater sound during pre-construction site investigation surveys (construction/decommissioning)
- Injury and disturbance from elevated underwater sound due to vessel use and other (non-piling) sound producing activities (all phases)
- In-combination effects (all phases).

1.2.3.59 Based on the evidence detailed in the HRA Stage 2 ISAA Part 2 – SAC assessments (Document Reference E1.2), Section 1.6: Assessment of potential Adverse Effect on Integrity: Annex II marine mammals, the assessment concluded that the conservation

objectives for the site would not be undermined and there would be no Adverse Effect on the Integrity of Saltee Islands SAC as a result of the Morgan Generation Assets alone, or in combination with other plans and projects.

Roaringwater Bay and Islands SAC

1.2.3.60 The Roaringwater Bay and Islands SAC is located 472.9 km away from Morgan Generation Assets. It is a large, open south westerly facing bay off the south west coast of Ireland. The SAC includes the immediate coastline on the mainland from Long Island to Baltimore, together with the whole bay and most of the islands.

1.2.3.61 The HRA Stage 1 Screening Report (Document Reference E1.4) could not rule out the risk of LSE on the Roaringwater Bay and Islands SAC. The impacts of the Morgan Generation Assets have been assessed in line with the iterative approach outlined in paragraph 1.2.3.2. Annex II marine mammals that are qualifying features of this European site, and were screened into the assessment include:

- Harbour porpoise *Phocoena phocoena*.

1.2.3.62 The HRA Stage 2 ISAA Part 2– SAC assessments (Document Reference E1.2) assessed the following impacts:

- Injury and disturbance from elevated underwater sound during piling (construction/decommissioning)
- Injury and disturbance from elevated underwater sound during UXO clearance (construction/decommissioning)
- Injury and disturbance from elevated underwater sound during pre-construction site investigation surveys (construction/decommissioning)
- Injury and disturbance from elevated underwater sound due to vessel use and other (non-piling) sound producing activities (all phases)
- In-combination effects (all phases).

1.2.3.63 Based on the evidence detailed in the HRA Stage 2 ISAA Part 2 – SAC assessments (Document Reference E1.2), Section 1.6: Assessment of potential Adverse Effect on Integrity: Annex II marine mammals, the assessment concluded that the conservation objectives for the site would not be undermined and there would be no Adverse Effect on the Integrity of Roaringwater Bay and Islands SAC as a result of the Morgan Generation Assets alone, or in combination with other plans and projects.

Blasket Islands SAC

1.2.3.64 The Blasket Islands SAC is located 589.6 km from the Morgan Generation Assets, off Slea Head, at the end of the Dingle Peninsula in CO, Kerry in the Republic of Ireland. The SAC includes all of the islands and islets in the group, as well as a substantial area of the surrounding seas.

1.2.3.65 The HRA Stage 1 Screening Report (Document Reference E1.4) could not rule out the risk of LSE on the Blasket Islands SAC. The impacts of the Morgan Generation Assets have been assessed in line with the iterative approach outlined in paragraph 1.2.3.2. Annex II marine mammals that are qualifying features of this European site, and were screened into the assessment include:

- Harbour porpoise *Phocoena phocoena*

1.2.3.66 The HRA Stage 2 ISAA Part 2– SAC assessments (Document Reference E1.2) assessed the following impacts:

- Injury and disturbance from elevated underwater sound during piling (construction/decommissioning)
- Injury and disturbance from elevated underwater sound during UXO clearance (construction/decommissioning)
- Injury and disturbance from elevated underwater sound during pre-construction site investigation surveys (construction/decommissioning)
- Injury and disturbance from elevated underwater sound due to vessel use and other (non-piling) sound producing activities (all phases)
- In-combination effects (all phases).

1.2.3.67 Based on the evidence detailed in the HRA Stage 2 ISAA Part 2 – SAC assessments (Document Reference E1.2), Section 1.6: Assessment of potential Adverse Effect on Integrity: Annex II marine mammals, the assessment concluded that the conservation objectives for the site would not be undermined and there would be no Adverse Effect on the Integrity of Blasket Islands SAC as a result of the Morgan Generation Assets alone, or in combination with other plans and projects.

Chaussée de Sein Site of Community Importance (SCI)

1.2.3.68 The Chaussée de Sein SCI is a French site located 675.6 km from Morgan Generation Assets. The SCI covers approximately 415 km^2, of which 99% of the site is marine.

1.2.3.69 The HRA Stage 1 Screening Report (Document Reference E1.4) could not rule out the risk of LSE on the Chaussée de Sein SCI. The impacts of the Morgan Generation Assets have been assessed in line with the iterative approach outlined in paragraph 1.2.3.2. Annex II marine mammals that are qualifying features of this European site, and were screened into the assessment include:

- Harbour porpoise *Phocoena phocoena*

1.2.3.70 The HRA Stage 2 ISAA Part 2– SAC assessments (Document Reference E1.2) assessed the following impacts:

- Injury and disturbance from elevated underwater sound during piling (construction/decommissioning)
- Injury and disturbance from elevated underwater sound during UXO clearance (construction/decommissioning)
- Injury and disturbance from elevated underwater sound during pre-construction site investigation surveys (construction/decommissioning)
- Injury and disturbance from elevated underwater sound due to vessel use and other (non-piling) sound producing activities (all phases)
- In-combination effects (all phases).

1.2.3.71 Based on the evidence detailed in the HRA Stage 2 ISAA Part 2 – SAC assessments (Document Reference E1.2), Section 1.6: Assessment of potential Adverse Effect on Integrity: Annex II marine mammals, the assessment concluded that the conservation objectives for the site would not be undermined and there would be no Adverse Effect on the Integrity of the Chaussée de Sein SCI as a result of the Morgan Generation Assets alone, or in combination with other plans and projects.

Mers Celtiques - Talus du golfe de Gascogne SCI

1.2.3.72 The Mers Celtiques - Talus du golfe de Gascogne SCI is a French site located 558.8 km from the Morgan Generation Assets. This SCI, covers a large extent of approximately 58,995 km^2, all of which is considered marine area.

1.2.3.73 The HRA Stage 1 Screening Report (Document Reference E1.4) could not rule out the risk of LSE on the Mers Celtiques - Talus du golfe de Gascogne SCI. The impacts of the Morgan Generation Assets have been assessed in line with the iterative approach outlined in paragraph 1.2.3.2. Annex II marine mammals that are qualifying features of this European site, and were screened into the assessment include:

- Harbour porpoise *Phocoena phocoena*.

1.2.3.74 The HRA Stage 2 ISAA Part 2– SAC assessments (Document Reference E1.2) assessed the following impacts:

- Injury and disturbance from elevated underwater sound during piling (construction/decommissioning)
- Injury and disturbance from elevated underwater sound during UXO clearance (construction/decommissioning)
- Injury and disturbance from elevated underwater sound during pre-construction site investigation surveys (construction/decommissioning)
- Injury and disturbance from elevated underwater sound due to vessel use and other (non-piling) sound producing activities (all phases)
- In-combination effects (all phases).

1.2.3.75 Based on the evidence detailed in the HRA Stage 2 ISAA Part 2 – SAC assessments (Document Reference E1.2), Section 1.6: Assessment of potential Adverse Effect on Integrity: Annex II marine mammals, the assessment concluded that the conservation objectives for the site would not be undermined and there would be no Adverse Effect on the Integrity of the Mers Celtiques - Talus du golfe de Gascogne SCI as a result of the Morgan Generation Assets alone, or in combination with other plans and projects.

Abers - Côte des legends SCI

1.2.3.1 The Abers - Côte des legends SCI is a French site located 625.7 km from the Morgan Generation Assets. This SCI covers approximately 227 km^2, 94% of which is considered marine area.

1.2.3.2 The HRA Stage 1 Screening Report (Document Reference E1.4) could not rule out the risk of LSE on the Abers - Côte des legends SCI. The impacts of the Morgan Generation Assets have been assessed in line with the iterative approach outlined in paragraph 1.2.3.2. Annex II marine mammals that are qualifying features of this European site, and were screened into the assessment include:

- Harbour porpoise *Phocoena phocoena*.

1.2.3.3 The HRA Stage 2 ISAA Part 2– SAC assessments (Document Reference E1.2) assessed the following impacts:

- Injury and disturbance from elevated underwater sound during piling (construction/decommissioning)
- Injury and disturbance from elevated underwater sound during UXO clearance (construction/decommissioning)
- Injury and disturbance from elevated underwater sound during pre-construction site investigation surveys (construction/decommissioning)
- Injury and disturbance from elevated underwater sound due to vessel use and other (non-piling) sound producing activities (all phases)
- In-combination effects (all phases).

1.2.3.4 Based on the evidence detailed in the HRA Stage 2 ISAA Part 2 – SAC assessments (Document Reference E1.2), Section 1.6: Assessment of potential Adverse Effect on Integrity: Annex II marine mammals, the assessment concluded that the conservation objectives for the site would not be undermined and there would be no Adverse Effect on the Integrity of the Abers - Côte des legends SCI as a result of the Morgan Generation Assets alone, or in combination with other plans and projects.

Ouessant-Molène SCI

1.2.3.5 The Ouessant-Molène SCI is a French site located 626.9 km from the Morgan Generation Assets, situated at the point where the Celtic Sea and the English Channel meet. The SCI covers a surface are of approximately 773 km^2, 99% of which is considered marine area.

1.2.3.6 The HRA Stage 1 Screening Report (Document Reference E1.4) could not rule out the risk of LSE on the Ouessant-Molène SCI. The impacts of the Morgan Generation Assets have been assessed in line with the iterative approach outlined in paragraph 1.2.3.2. Annex II marine mammals that are qualifying features of this European site, and were screened into the assessment include:

- Harbour porpoise *Phocoena phocoena*.

1.2.3.7 The HRA Stage 2 ISAA Part 2– SAC assessments (Document Reference E1.2) assessed the following impacts:

- Injury and disturbance from elevated underwater sound during piling (construction/decommissioning)
- Injury and disturbance from elevated underwater sound during UXO clearance (construction/decommissioning)
- Injury and disturbance from elevated underwater sound during pre-construction site investigation surveys (construction/decommissioning)
- Injury and disturbance from elevated underwater sound due to vessel use and other (non-piling) sound producing activities (all phases)
- In-combination effects (all phases).

1.2.3.8 Based on the evidence detailed in the HRA Stage 2 ISAA Part 2 – SAC assessments (Document Reference E1.2), Section 1.6: Assessment of potential Adverse Effect on Integrity: Annex II marine mammals, the assessment concluded that the conservation objectives for the site would not be undermined and there would be no Adverse Effect

on the Integrity of the Ouessant-Molène SCI as a result of the Morgan Generation Assets alone, or in combination with other plans and projects.

Côte de Granit rose-Sept-Iles SCI

1.2.3.9 The Côte de Granit rose-Sept-Iles SCI is a French site located 633 km from the Morgan Generation Assets. This SCI covers a surface area of approximately 696 km^2, 100% of which is considered marine area.

1.2.3.10 The HRA Stage 1 Screening Report (Document Reference E1.4) could not rule out the risk of LSE on the Côte de Granit rose-Sept-Iles SCI. The impacts of the Morgan Generation Assets have been assessed in line with the iterative approach outlined in paragraph 1.2.3.2. Annex II marine mammals that are qualifying features of this European site, and were screened into the assessment include:

- Harbour porpoise *Phocoena phocoena*.

1.2.3.11 The HRA Stage 2 ISAA Part 2– SAC assessments (Document Reference E1.2) assessed the following impacts:

- Injury and disturbance from elevated underwater sound during piling (construction/decommissioning)
- Injury and disturbance from elevated underwater sound during UXO clearance (construction/decommissioning)
- Injury and disturbance from elevated underwater sound during pre-construction site investigation surveys (construction/decommissioning)
- Injury and disturbance from elevated underwater sound due to vessel use and other (non-piling) sound producing activities (all phases)
- In-combination effects (all phases).

1.2.3.12 Based on the evidence detailed in the HRA Stage 2 ISAA Part 2 – SAC assessments (Document Reference E1.2), Section 1.6: Assessment of potential Adverse Effect on Integrity: Annex II marine mammals, the assessment concluded that the conservation objectives for the site would not be undermined and there would be no Adverse Effect on the Integrity of the Côte de Granit rose-Sept-Iles SCI as a result of the Morgan Generation Assets alone, or in combination with other plans and projects.

Anse de Goulven, dunes de Keremma SCI

1.2.3.13 The Anse de Goulven, dunes de Keremma SCI is a French site located 635.8 km away from the Morgan Generation Assets. This SCI covers a surface area of approximately 21 km^2, of which 87% is considered marine area. This site also protects a variety of intertidal species.

1.2.3.14 The HRA Stage 1 Screening Report (Document Reference E1.4) could not rule out the risk of LSE on the Anse de Goulven, dunes de Keremma SCI. The impacts of the Morgan Generation Assets have been assessed in line with the iterative approach outlined in paragraph 1.2.3.2. Annex II marine mammals that are qualifying features of this European site, and were screened into the assessment include:

- Harbour porpoise *Phocoena phocoena*.

1.2.3.15 The HRA Stage 2 ISAA Part 2– SAC assessments (Document Reference E1.2) assessed the following impacts:

- Injury and disturbance from elevated underwater sound during piling (construction/decommissioning)
- Injury and disturbance from elevated underwater sound during UXO clearance (construction/decommissioning)
- Injury and disturbance from elevated underwater sound during pre-construction site investigation surveys (construction/decommissioning)
- Injury and disturbance from elevated underwater sound due to vessel use and other (non-piling) sound producing activities (all phases)
- In-combination effects (all phases).

1.2.3.16 Based on the evidence detailed in the HRA Stage 2 ISAA Part 2 – SAC assessments (Document Reference E1.2), Section 1.6: Assessment of potential Adverse Effect on Integrity: Annex II marine mammals, the assessment concluded that the conservation objectives for the site would not be undermined and there would be no Adverse Effect on the Integrity of the Anse de Goulven, dunes de Keremma SCI as a result of the Morgan Generation Assets alone, or in combination with other plans and projects.

Tregor Goëlo SCI

1.2.3.17 The Tregor Goëlo SCI is a French site located 656.2 km away from the Morgan Generation Assets. The site covers approximately 912 km^2, 97% of which is considered marine area.

1.2.3.18 The HRA Stage 1 Screening Report (Document Reference E1.4) could not rule out the risk of LSE on the Tregor Goëlo SCI. The impacts of the Morgan Generation Assets have been assessed in line with the iterative approach outlined in paragraph 1.2.3.2. Annex II marine mammals that are qualifying features of this European site, and were screened into the assessment include:

- Harbour porpoise *Phocoena phocoena*.

1.2.3.19 The HRA Stage 2 ISAA Part 2– SAC assessments (Document Reference E1.2) assessed the following impacts:

- Injury and disturbance from elevated underwater sound during piling (construction/decommissioning)
- Injury and disturbance from elevated underwater sound during UXO clearance (construction/decommissioning)
- Injury and disturbance from elevated underwater sound during pre-construction site investigation surveys (construction/decommissioning)
- Injury and disturbance from elevated underwater sound due to vessel use and other (non-piling) sound producing activities (all phases)
- In-combination effects (all phases).

1.2.3.20 Based on the evidence detailed in the HRA Stage 2 ISAA Part 2 – SAC assessments (Document Reference E1.2), Section 1.6: Assessment of potential Adverse Effect on Integrity: Annex II marine mammals, the assessment concluded that the conservation objectives for the site would not be undermined and there would be no Adverse Effect on the Integrity of the Tregor Goëlo SCI as a result of the Morgan Generation Assets alone, or in combination with other plans and projects.

Côtes de Crozon SCI

1.2.3.21 The Côtes de Crozon SCI is a French site located 664.4 km away from the Morgan Generation Assets. It covers a surface area of approximately 102 km^2, 100% of which is marine area, consisting of sandbanks, reefs and sea caves.

1.2.3.22 The HRA Stage 1 Screening Report (Document Reference E1.4) could not rule out the risk of LSE on the Côtes de Crozon SCI. The impacts of the Morgan Generation Assets have been assessed in line with the iterative approach outlined in paragraph 1.2.3.2. Annex II marine mammals that are qualifying features of this European site, and were screened into the assessment include:

- Harbour porpoise *Phocoena phocoena*.

1.2.3.23 The HRA Stage 2 ISAA Part 2– SAC assessments (Document Reference E1.2) assessed the following impacts:

- Injury and disturbance from elevated underwater sound during piling (construction/decommissioning)
- Underwater sound from clearance of UXO (construction/decommissioning)
- Injury and disturbance from elevated underwater sound during pre-construction site investigation surveys (construction/decommissioning)
- Injury and disturbance from elevated underwater sound due to vessel use and other (non-piling) sound producing activities (all phases)
- In-combination effects (all phases).

1.2.3.24 Based on the evidence detailed in the HRA Stage 2 ISAA Part 2 – SAC assessments (Document Reference E1.2), Section 1.6: Assessment of potential Adverse Effect on Integrity: Annex II marine mammals, the assessment concluded that the conservation objectives for the site would not be undermined and there would be no Adverse Effect on the Integrity of the Côtes de Crozon SCI as a result of the Morgan Generation Assets alone, or in combination with other plans and projects.

Cap Sizun SCI

1.2.3.25 The Cap Sizun SCI is a French site located 684.5 km away from the Morgan Generation Assets. The SCI covers an area of approximately 28 km^2, 22% of which is considered marine area.

1.2.3.26 The HRA Stage 1 Screening Report (Document Reference E1.4) could not rule out the risk of LSE on the Cap Sizun SCI. The impacts of the Morgan Generation Assets have been assessed in line with the iterative approach outlined in paragraph 1.2.3.2. Annex II marine mammals that are qualifying features of this European site, and were screened into the assessment include:

- Harbour porpoise *Phocoena phocoena*.

1.2.3.27 The HRA Stage 2 ISAA Part 2– SAC assessments (Document Reference E1.2) assessed the following impacts:

- Injury and disturbance from elevated underwater sound during piling (construction/decommissioning)
- Injury and disturbance from elevated underwater sound during UXO clearance (construction/decommissioning)

- Injury and disturbance from elevated underwater sound during pre-construction site investigation surveys (construction/decommissioning)
- Injury and disturbance from elevated underwater sound due to vessel use and other (non-piling) sound producing activities (all phases)
- In-combination effects (all phases).

1.2.3.28 Based on the evidence detailed in the HRA Stage 2 ISAA Part 2 – SAC assessments (Document Reference E1.2), Section 1.6: Assessment of potential Adverse Effect on Integrity: Annex II marine mammals, the assessment concluded that the conservation objectives for the site would not be undermined and there would be no Adverse Effect on the Integrity of the Cap Sizun SCI as a result of the Morgan Generation Assets alone, or in combination with other plans and projects.

Récifs du talus du golfe de Gascogne SCI

1.2.3.29 The Récifs du talus du golfe de Gascogne SCI is a French site located 712.7 km away from the Morgan Generation Assets, specifically along the transition zone between the continental shelf and the abyssal plain in the Gulf of Gacony. The SCI covers a surface area of approximately 3,340 km^2, 100% of which is considered marine area.

1.2.3.30 The HRA Stage 1 Screening Report (Document Reference E1.4) could not rule out the risk of LSE on the Récifs du talus du golfe de Gascogne SCI. The impacts of the Morgan Generation Assets have been assessed in line with the iterative approach outlined in paragraph 1.2.3.2. Annex II marine mammals that are qualifying features of this European site, and were screened into the assessment include:

- Harbour porpoise *Phocoena phocoena*.

1.2.3.31 The HRA Stage 2 ISAA Part 2– SAC assessments (Document Reference E1.2) assessed the following impacts:

- Injury and disturbance from elevated underwater sound during piling (construction/decommissioning)
- Injury and disturbance from elevated underwater sound during UXO clearance (construction/decommissioning)
- Injury and disturbance from elevated underwater sound during pre-construction site investigation surveys (construction/decommissioning)
- Injury and disturbance from elevated underwater sound due to vessel use and other (non-piling) sound producing activities (all phases)
- In-combination effects (all phases).

1.2.3.32 Based on the evidence detailed in the HRA Stage 2 ISAA Part 2 – SAC assessments (Document Reference E1.2), Section 1.6: Assessment of potential Adverse Effect on Integrity: Annex II marine mammals, the assessment concluded that the conservation objectives for the site would not be undermined and there would be no Adverse Effect on the Integrity of the Récifs du talus du golfe de Gascogne SCI as a result of the Morgan Generation Assets alone, or in combination with other plans and projects.

Anse de Vauville SCI

1.2.3.33 The Anse de Vauville SCI is a French site located 722.8 km away from the Morgan Generation Assets. The SCI covers a surface area of approximately 131 km^2, 100% of which is considered marine area.

1.2.3.34 The HRA Stage 1 Screening Report (Document Reference E1.4) could not rule out the risk of LSE on the Anse de Vauville SCI. The impacts of the Morgan Generation Assets have been assessed in line with the iterative approach outlined in paragraph 1.2.3.2. Annex II marine mammals that are qualifying features of this European site, and were screened into the assessment include:

- Harbour porpoise *Phocoena phocoena*.

1.2.3.35 The HRA Stage 2 ISAA Part 2– SAC assessments (Document Reference E1.2) assessed the following impacts:

- Injury and disturbance from elevated underwater sound during piling (construction/decommissioning)
- Injury and disturbance from elevated underwater sound during UXO clearance (construction/decommissioning)
- Injury and disturbance from elevated underwater sound during pre-construction site investigation surveys (construction/decommissioning)
- Injury and disturbance from elevated underwater sound due to vessel use and other (non-piling) sound producing activities (all phases)
- In-combination effects (all phases).

1.2.3.36 Based on the evidence detailed in the HRA Stage 2 ISAA Part 2 – SAC assessments (Document Reference E1.2), Section 1.6: Assessment of potential Adverse Effect on Integrity: Annex II marine mammals, the assessment concluded that the conservation objectives for the site would not be undermined and there would be no Adverse Effect on the Integrity of the Anse de Vauville SCI as a result of the Morgan Generation Assets alone, or in combination with other plans and projects.

Cap d'Erquy-Cap Fréhel SCI

1.2.3.37 The Cap d'Erquy-Cap Fréhel SCI is a French site located 724.1 km away from the Morgan Generation Assets. The SCI covers a surface area of approximately 404 km^2, 25% of which is considered marine area. The site consists of a vast ensemble of coastal habitats including lands, dunes, cliffs and islets.

1.2.3.38 The HRA Stage 1 Screening Report (Document Reference E1.4) could not rule out the risk of LSE on the Cap d'Erquy-Cap Fréhel SCI. The impacts of the Morgan Generation Assets have been assessed in line with the iterative approach outlined in paragraph 1.2.3.2. Annex II marine mammals that are qualifying features of this European site, and were screened into the assessment include:

- Harbour porpoise *Phocoena phocoena*.

1.2.3.39 The HRA Stage 2 ISAA Part 2– SAC assessments (Document Reference E1.2) assessed the following impacts:

- Injury and disturbance from elevated underwater sound during piling (construction/decommissioning)
- Injury and disturbance from elevated underwater sound during UXO clearance (construction/decommissioning)
- Injury and disturbance from elevated underwater sound during pre-construction site investigation surveys (construction/decommissioning)
- Injury and disturbance from elevated underwater sound due to vessel use and other (non-piling) sound producing activities (all phases)

- In-combination effects (all phases).

1.2.3.40 Based on the evidence detailed in the HRA Stage 2 ISAA Part 2 – SAC assessments (Document Reference E1.2), Section 1.6: Assessment of potential Adverse Effect on Integrity: Annex II marine mammals, the assessment concluded that the conservation objectives for the site would not be undermined and there would be no Adverse Effect on the Integrity of the Cap d'Erquy-Cap Fréhel SCI as a result of the Morgan Generation Assets alone, or in combination with other plans and projects.

Baie de Saint-Brieuc – Est SCI

1.2.3.41 The Baie de Saint-Brieuc – Est SCI is a French site located 724.8 km away from the Morgan Generation Assets. The SCI covers a surface area of approximately 135km^2, with 99% of its area being considered marine.

1.2.3.42 The HRA Stage 1 Screening Report (Document Reference E1.4) could not rule out the risk of LSE on the Baie de Saint-Brieuc – Est SCI. The impacts of the Morgan Generation Assets have been assessed in line with the iterative approach outlined in paragraph 1.2.3.2. Annex II marine mammals that are qualifying features of this European site, and were screened into the assessment include:

- Harbour porpoise *Phocoena phocoena*.

1.2.3.43 The HRA Stage 2 ISAA Part 2– SAC assessments (Document Reference E1.2) assessed the following impacts:

- Injury and disturbance from elevated underwater sound during piling (construction/decommissioning)
- Injury and disturbance from elevated underwater sound during UXO clearance (construction/decommissioning)
- Injury and disturbance from elevated underwater sound during pre-construction site investigation surveys (construction/decommissioning)
- Injury and disturbance from elevated underwater sound due to vessel use and other (non-piling) sound producing activities (all phases)
- In-combination effects (all phases).

1.2.3.44 Based on the evidence detailed in the HRA Stage 2 ISAA Part 2 – SAC assessments (Document Reference E1.2), Section 1.6: Assessment of potential Adverse Effect on Integrity: Annex II marine mammals, the assessment concluded that the conservation objectives for the site would not be undermined and there would be no Adverse Effect on the Integrity of the Baie de Saint-Brieuc – Est SCI as a result of the Morgan Generation Assets alone, or in combination with other plans and projects.

Banc et récifs de Surtainville SCI

1.2.3.45 The Banc et récifs de Surtainville SCI is a French site located 726.9 km away from the Morgan Generation Assets. The SCI covers a surface area of approximately 141 km^2, 100% of which is considered marine area.

1.2.3.46 The HRA Stage 1 Screening Report (Document Reference E1.4) could not rule out the risk of LSE on the Banc et récifs de Surtainville SCI. The impacts of the Morgan Generation Assets have been assessed in line with the iterative approach outlined in paragraph 1.2.3.2. Annex II marine mammals that are qualifying features of this European site, and were screened into the assessment include:

- Harbour porpoise *Phocoena phocoena*.

1.2.3.47 The HRA Stage 2 ISAA Part 2– SAC assessments (Document Reference E1.2) assessed the following impacts:

- Injury and disturbance from elevated underwater sound during piling (construction/decommissioning)
- Injury and disturbance from elevated underwater sound during UXO clearance (construction/decommissioning)
- Injury and disturbance from elevated underwater sound during pre-construction site investigation surveys (construction/decommissioning)
- Injury and disturbance from elevated underwater sound due to vessel use and other (non-piling) sound producing activities (all phases)
- In-combination effects (all phases).

1.2.3.48 Based on the evidence detailed in the HRA Stage 2 ISAA Part 2 – SAC assessments (Document Reference E1.2), Section 1.6: Assessment of potential Adverse Effect on Integrity: Annex II marine mammals, the assessment concluded that the conservation objectives for the site would not be undermined and there would be no Adverse Effect on the Integrity of the Banc et récifs de Surtainville SCI as a result of the Morgan Generation Assets alone, or in combination with other plans and projects.

Baie de Lancieux, Baie de l'Arguenon, Archipel de Saint Malo et Dinard SCI

1.2.3.49 The Baie de Lancieux, Baie de l'Arguenon, Archipel de Saint Malo et Dinard SCI is a French site located 750.2 km away from the Morgan Generation Assets. The SCI covers a surface area of approximately 135 km^2, with 99% of its area being considered marine.

1.2.3.50 The HRA Stage 1 Screening Report (Document Reference E1.4) could not rule out the risk of LSE on the Baie de Lancieux, Baie de l'Arguenon, Archipel de Saint Malo et Dinard SCII. The impacts of the Morgan Generation Assets have been assessed in line with the iterative approach outlined in paragraph 1.2.3.2. Annex II marine mammals that are qualifying features of this European site, and were screened into the assessment include:

- Harbour porpoise *Phocoena phocoena*.

1.2.3.51 The HRA Stage 2 ISAA Part 2– SAC assessments (Document Reference E1.2) assessed the following impacts:

- Injury and disturbance from elevated underwater sound during piling (construction/decommissioning)
- Injury and disturbance from elevated underwater sound during UXO clearance (construction/decommissioning)
- Injury and disturbance from elevated underwater sound during pre-construction site investigation surveys (construction/decommissioning)
- Injury and disturbance from elevated underwater sound due to vessel use and other (non-piling) sound producing activities (all phases)
- In-combination effects (all phases).

1.2.3.52 Based on the evidence detailed in the HRA Stage 2 ISAA Part 2 – SAC assessments (Document Reference E1.2), Section 1.6: Assessment of potential Adverse Effect on Integrity: Annex II marine mammals, the assessment concluded that the conservation objectives for the site would not be undermined and there would be no Adverse Effect on the Integrity of the Baie de Lancieux, Baie de l'Arguenon, Archipel de Saint Malo et Dinard SCI as a result of the Morgan Generation Assets alone, or in combination with other plans and projects.

Estuaire de la Rance SCI

1.2.3.53 The Estuaure de le Rance SCI is a French site located 763.4 km away from the Morgan Generation Assets. The SCI is a steep-sided ria located along the Brittany coast in northern France, which covers a surface area of approximately 28 km^2, 33% of which is considered marine.

1.2.3.54 The HRA Stage 1 Screening Report (Document Reference E1.4) could not rule out the risk of LSE on the Estuaire de la Rance SCI. The impacts of the Morgan Generation Assets have been assessed in line with the iterative approach outlined in paragraph 1.2.3.2. Annex II marine mammals that are qualifying features of this European site, and were screened into the assessment include:

- Harbour porpoise *Phocoena phocoena*.

1.2.3.55 The HRA Stage 2 ISAA Part 2 – SAC assessments (Document Reference E1.2) assessed the following impacts:

- Injury and disturbance from elevated underwater sound during piling (construction/decommissioning)
- Injury and disturbance from elevated underwater sound during UXO clearance (construction/decommissioning)
- Injury and disturbance from elevated underwater sound during pre-construction site investigation surveys (construction/decommissioning)
- Injury and disturbance from elevated underwater sound due to vessel use and other (non-piling) sound producing activities (all phases)
- In-combination effects (all phases).

1.2.3.56 Based on the evidence detailed in the HRA Stage 2 ISAA Part 2 – SAC assessments (Document Reference E1.2), Section 1.6: Assessment of potential Adverse Effect on Integrity: Annex II marine mammals, the assessment concluded that the conservation objectives for the site would not be undermined and there would be no Adverse Effect on the Integrity of the Estuaire de la Rance SCI as a result of the Morgan Generation Assets alone, or in combination with other plans and projects.

Baie du Mont Saint Michel SCI

1.2.3.57 The Baie du Mont Saint Michel SCI is a French site located 769 km away from the Morgan Generation Assets. This site mainly represents large areas of saltmarshes and covers a total surface area of approximately 476 km^2, of which 83% is considered marine area.

1.2.3.58 The HRA Stage 1 Screening Report (Document Reference E1.4) could not rule out the risk of LSE on the Baie du Mont Saint Michel SCI. The impacts of the Morgan Generation Assets have been assessed in line with the iterative approach outlined in

paragraph 1.2.3.2. Annex II marine mammals that are qualifying features of this European site, and were screened into the assessment include:

- Harbour porpoise *Phocoena phocoena*.

1.2.3.59 The HRA Stage 2 ISAA Part 2– SAC assessments (Document Reference E1.2) assessed the following impacts:

- Injury and disturbance from elevated underwater sound during piling (construction/decommissioning)
- Injury and disturbance from elevated underwater sound during UXO clearance (construction/decommissioning)
- Injury and disturbance from elevated underwater sound during pre-construction site investigation surveys (construction/decommissioning)
- Injury and disturbance from elevated underwater sound due to vessel use and other (non-piling) sound producing activities (all phases)
- In-combination effects (all phases).

1.2.3.60 Based on the evidence detailed in the HRA Stage 2 ISAA Part 2 – SAC assessments (Document Reference E1.2), Section 1.6: Assessment of potential Adverse Effect on Integrity: Annex II marine mammals, the assessment concluded that the conservation objectives for the site would not be undermined and there would be no Adverse Effect on the Integrity of the Baie du Mont Saint Michel SCI as a result of the Morgan Generation Assets alone, or in combination with other plans and projects.

1.2.4 Offshore ornithology

1.2.4.1 The HRA Stage 1 Screening Report (Document Reference E1.4) identified the potential for LSE on 35 SPAs and three Ramsar sites designated for offshore ornithological species and features, which have been considered in the HRA Stage 2 Part 3 – SPA and Ramsar Sites Assessments (Document Reference E1.3).

1.2.4.2 The conclusions of the HRA Stage 2 ISAA Part 3 – SPA and Ramsar Sites Assessments (Document Reference E1.3) for the European sites considered for offshore ornithology are summarised in the following paragraphs 1.2.4.3 to 1.2.4.110 in order of increasing distance from the Morgan Generation Assets.

Morecambe Bay and Duddon Estuary Special Protection Area (SPA)/Morecambe Bay Ramsar

1.2.4.3 The Morecambe Bay and Duddon Estuary Special Protection Area (SPA)/Morecambe Bay Ramsar is located 31.3 km away from the Morgan Generation Assets and is located on the northern Lancashire and southern Cumbria coast and incorporates the second largest embayment in Britain.

1.2.4.4 The HRA Stage 1 Screening Report (Document Reference E1.4) could not rule out the risk of LSE on the Morecambe Bay and Duddon Estuary SPA/Morecambe Bay Ramsar. The impacts of the Morgan Generation Assets have been assessed with respect to the conservation objectives of this site. Seabird species that are qualifying features of this European site, and were screened into the assessment include:

- Lesser black-backed gull *Larus fuscus*
- Herring gull *Larus argentatus*
- Breeding seabird assemblage.

1.2.4.5 The HRA Stage 2 ISAA Part 3 – SPA and Ramsar Sites Assessments (Document Reference E1.3) assessed the following impacts:

- Collision risk impacts (operations and maintenance)
- In-combination collision risk (operations and maintenance).

1.2.4.6 Based on the evidence detailed in the HRA Stage 2 ISAA Part 3 – SPA and Ramsar Sites Assessments (Document Reference E1.3), Section 1.5: Assessment of potential Adverse Effect on Integrity: offshore ornithology, the assessment concluded that the conservation objectives for the sites would not be undermined and there would be no Adverse Effect on the Integrity of the Morecambe Bay and Duddon Estuary SPA/ Morecambe Bay Ramsar as a result of the Morgan Generation Assets alone, or in combination with other plans and projects.

Ribble and Alt Estuaries SPA / Ribble and Alt Estuaries Ramsar site

1.2.4.7 The Ribble and Alt Estuaries SPA is located 51 km away from the Morgan Generation Assets, situated in the northwest of England. It is a vital habitat for various species, including waterbirds.

1.2.4.8 The HRA Stage 1 Screening Report (Document Reference E1.4) could not rule out the risk of LSE on the Ribble and Alt Estuaries SPA. The impacts of the Morgan Generation Assets have been assessed with respect to the conservation objectives of this site. Seabird species that are qualifying features of this European site, and were screened into the assessment include:

- Lesser black-backed gull *Larus fuscus*
- Breeding seabird assemblage.

1.2.4.9 The HRA Stage 2 ISAA Part 3 – SPA and Ramsar Sites Assessments (Document Reference E1.3) assessed the following impacts:

- Collision risk impacts (operations and maintenance)
- In-combination collision risk (operations and maintenance).

1.2.4.10 Based on the evidence detailed in the HRA Stage 2 ISAA Part 3 – SPA and Ramsar Sites Assessments (Document Reference E1.3), Section 1.5: Assessment of potential Adverse Effect on Integrity: offshore ornithology, the assessment concluded that the conservation objectives for the site would not be undermined and there would be no Adverse Effect on the Integrity of the Ribble and Alt Estuaries SPA as a result of the Morgan Generation Assets alone, or in combination with other plans and projects.

Irish Sea Front SPA

1.2.4.11 The Irish Sea Front SPA is located 56.7 km away from the Morgan Generation Assets. The SPA covers an area of approximately 180 km^2 and hosts the third largest marine aggregation of breeding Manx shearwaters identified in the UK.

1.2.4.12 The HRA Stage 1 Screening Report (Document Reference E1.4) could not rule out the risk of LSE on the Irish Sea Front SPA. The impacts of the Morgan Generation Assets have been assessed with respect to the conservation objectives of this site. Seabird species that are qualifying features of this European site, and were screened into assessment include:

- Manx shearwater *Puffinus puffinus*.

1.2.4.13 The HRA Stage 2 ISAA Part 3 – SPA and Ramsar Sites Assessments (Document Reference E1.3) assessed the following impacts:

- Disturbance and displacement from airborne sound and presence of vessels and infrastructure (operations and maintenance)
- In-combination disturbance and displacement effects from airborne sound and presence of vessels and infrastructure (operations and maintenance).

1.2.4.14 Based on the evidence detailed in the HRA Stage 2 ISAA Part 3 – SPA and Ramsar Sites Assessments (Document Reference E1.3), Section 1.5: Assessment of potential Adverse Effect on Integrity: offshore ornithology, the assessment concluded that the conservation objectives for the site would not be undermined and there would be no Adverse Effect on the Integrity of the Irish Sea Front SPA as a result of the Morgan Generation Assets alone, or in combination with other plans and projects.

Bowland Fells SPA

1.2.4.15 The Bowland Fells SPA is located 70 km away from the Morgan Generation Assets, located to the east of Lancaster. The SPA supports a large area of blanket bog and heather moorland, providing a crucial habitat for breeding bird communities.

1.2.4.16 The HRA Stage 1 Screening Report (Document Reference E1.4) could not rule out the risk of LSE on the Bowland Fells SPA. The impacts of the Morgan Generation Assets have been assessed with respect to the conservation objectives of this site. Seabird species that are qualifying features of this European site, and were screened into the assessment include:

- Lesser black-backed gull *Larus fuscus*.

1.2.4.17 The HRA Stage 2 ISAA Part 3 – SPA and Ramsar Sites Assessments (Document Reference E1.3) assessed the following impacts:

- Collision risk impacts (operations and maintenance)
- In-combination collision risk (operations and maintenance).

1.2.4.18 Based on the evidence detailed in the HRA Stage 2 ISAA Part 3 – SPA and Ramsar Sites Assessments (Document Reference E1.3), Section 1.5: Assessment of potential Adverse Effect on Integrity: offshore ornithology, the assessment concluded that the conservation objectives for the site would not be undermined and there would be no Adverse Effect on the Integrity of the Bowland Fells SPA as a result of the Morgan Generation Assets alone, or in combination with other plans and projects.

North-west Irish Sea SPA

1.2.4.19 The North-west Irish Sea SPA is located 88.2 km away from the Morgan Generation Assets, in the Irish Sea. The SPA includes estuaries, bays and connecting coastal stretches of intertidal and shallow subtidal habitats.

1.2.4.20 The HRA Stage 1 Screening Report (Document Reference E1.4) could not rule out the risk of LSE on the North-west Irish Sea SPA. The impacts of the Morgan Generation Assets have been assessed with respect to the conservation objectives of this site. Seabird species that are qualifying features of this European site, and were screened into assessment include:

- Kittiwake *Rissa tridactyla*.
- Herring gull *Larus argentatus* (non-breeding season)

- Guillemot *Uria aalge* (non-breeding season)
- Razorbill *Alca torda* (non-breeding season)

1.2.4.21 The HRA Stage 2 ISAA Part 3 – SPA and Ramsar Sites Assessments (Document Reference E1.3) assessed the following impacts:

- Disturbance and displacement from airborne sound and presence of vessels and infrastructure (operations and maintenance)
- Collision risk (operations and maintenance)
- In-combination collision risk (operations and maintenance)
- In-combination disturbance and displacement from airborne sound and presence of vessels and infrastructure (operations and maintenance).

1.2.4.22 Based on the evidence detailed in the HRA Stage 2 ISAA Part 3 – SPA and Ramsar Sites Assessments (Document Reference E1.3), Section 1.5: Assessment of potential Adverse Effect on Integrity: offshore ornithology, the assessment concluded that the conservation objectives for the site would not be undermined and there would be no Adverse Effect on the Integrity of the North-west Irish Sea SPA as a result of the Morgan Generation Assets alone, or in combination with other plans and projects.

Copeland Islands SPA

1.2.4.23 The Copeland Islands SPA is located 112.3 km away from the Morgan Generation Assets, located off the north east coast of County Down. The SPA comprises three islands: Copeland Island (referred to as Big Copeland), Light House Island, and Mew Island.

1.2.4.24 The HRA Stage 1 Screening Report (Document Reference E1.4) could not rule out the risk of LSE on the Copeland Islands SPA. The impacts of the Morgan Generation Assets have been assessed with respect to the conservation objectives of this site. Seabird species that are qualifying features of this European site, and were screened into the assessment include:

- Manx shearwater *Puffinus puffinus*.

1.2.4.25 The HRA Stage 2 ISAA Part 3 – SPA and Ramsar Sites Assessments (Document Reference E1.3) assessed the following impacts:

- Disturbance and displacement from airborne sound and presence of vessels and infrastructure (operations and maintenance)
- In-combination disturbance and displacement from airborne sound and presence of vessels and infrastructure (operations and maintenance).

1.2.4.26 Based on the evidence detailed in the HRA Stage 2 ISAA Part 3 – SPA and Ramsar Sites Assessments (Document Reference E1.3), Section 1.5: Assessment of potential Adverse Effect on Integrity: offshore ornithology, the assessment concluded that the conservation objectives for the site would not be undermined and there would be no Adverse Effect on the Integrity of the Copeland Islands SPA as a result of the Morgan Generation Assets alone, or in combination with other plans and projects.

Glannau Aberdaron ac Ynys Enlli/Aberdaron Coast and Bardsey Island SPA

1.2.4.27 The Glannau Aberdaron ac Ynys Enlli/Aberdaron Coast and Bardsey Island SPA is located 128.7 km away from the Morgan Generation Assets. The SPA covers the tip

of the Llŷn peninsula, Ynys Enlli/Bardsey Island, and Ynysoedd y Gwylanod/Gwylan Islands. It is important for breeding seabirds and other cliff-nesting species.

1.2.4.28 The HRA Stage 1 Screening Report (Document Reference E1.4) could not rule out the risk of LSE on the Glannau Aberdaron ac Ynys Enlli/Aberdaron Coast and Bardsey Island SPA. The impacts of the Morgan Generation Assets have been assessed with respect to the conservation objectives of this site. Seabird species that are qualifying features of this European site, and were screened into the assessment include:

- Manx shearwater *Puffinus puffinus*.

1.2.4.29 The HRA Stage 2 ISAA Part 3 – SPA and Ramsar Sites Assessments (Document Reference E1.3) assessed the following impacts:

- Disturbance and displacement from airborne sound and presence of vessels and infrastructure (operations and maintenance)
- In-combination disturbance and displacement from airborne sound and presence of vessels and infrastructure (operations and maintenance).

1.2.4.30 Based on the evidence detailed in the HRA Stage 2 ISAA Part 3 – SPA and Ramsar Sites Assessments (Document Reference E1.3), Section 1.5: Assessment of potential Adverse Effect on Integrity: offshore ornithology, the assessment concluded that the conservation objectives for the site would not be undermined and there would be no Adverse Effect on the Integrity of the Glannau Aberdaron ac Ynys Enlli/Aberdaron Coast and Bardsey Island SPA as a result of the Morgan Generation Assets alone, or in combination with other plans and projects.

Lambay Island SPA

1.2.4.31 The Lambay Island SPA is located 130.4 km away from the Morgan Generation Assets, located off the coast of County Dublin, Ireland. The SPA is isolated from the mainland and designated for being of special conservation interest for several bird species.

1.2.4.32 The HRA Stage 1 Screening Report (Document Reference E1.4) could not rule out the risk of LSE on the Lambay Island SPA. The impacts of the Morgan Generation Assets have been assessed with respect to the conservation objectives of this site. Seabird species that are qualifying features of this European site, and were screened into the assessment include:

- Kittiwake *Rissa tridactyla.*
- Herring gull *Larus argentatus* (non-breeding season)
- Guillemot *Uria aalge* (non-breeding season)
- Razorbill *Alca torda* (non-breeding season)
- Breeding seabird assemblage.

1.2.4.33 The HRA Stage 2 ISAA Part 3 – SPA and Ramsar Sites Assessments (Document Reference E1.3) assessed the following impacts:

- Disturbance and displacement from airborne sound and presence of vessels and infrastructure (operations and maintenance)
- Collision risk (operations and maintenance)
- In-combination collision risk (operations and maintenance)

- In-combination disturbance and displacement effects from airborne sound and presence of vessels and infrastructure (operations and maintenance).

1.2.4.34 Based on the evidence detailed in the HRA Stage 2 ISAA Part 3 – SPA and Ramsar Sites Assessments (Document Reference E1.3), Section 1.5: Assessment of potential Adverse Effect on Integrity: offshore ornithology, the assessment concluded that the conservation objectives for the site would not be undermined and there would be no Adverse Effect on the Integrity of the Lambay Island SPA as a result of the Morgan Generation Assets alone, or in combination with other plans and projects.

Ireland's Eye SPA

1.2.4.35 The Ireland's Eye SPA is located 138.6 km away from the Morgan Generation Assets, off the coast of County Dublin, Ireland. The SPA covers an area of approximately 2 km^2 and provides foraging breeding and roosting habitats for several bird species.

1.2.4.36 The HRA Stage 1 Screening Report (Document Reference E1.4) could not rule out the risk of LSE on the Ireland's Eye SPA. The impacts of the Morgan Generation Assets have been assessed with respect to the conservation objectives of this site. Seabird species that are qualifying features of this European site, and were screened into the assessment include:

- Kittiwake *Rissa tridactyla.*

1.2.4.37 The HRA Stage 2 ISAA Part 3 – SPA and Ramsar Sites Assessments (Document Reference E1.3) assessed the following impacts:

- Disturbance and displacement from airborne sound and presence of vessels and infrastructure (operations and maintenance)
- Collision risk (operations and maintenance)
- In-combination collision risk (operations and maintenance)
- In-combination disturbance and displacement effects from airborne sound and presence of vessels and infrastructure (operations and maintenance).

1.2.4.38 Based on the evidence detailed in the HRA Stage 2 ISAA Part 3 – SPA and Ramsar Sites Assessments (Document Reference E1.3), Section 1.5: Assessment of potential Adverse Effect on Integrity: offshore ornithology, the assessment concluded that the conservation objectives for the site would not be undermined and there would be no Adverse Effect on the Integrity of the Ireland's Eye SPA as a result of the Morgan Generation Assets alone, or in combination with other plans and projects.

Ailsa Craig SPA

1.2.4.39 The Ailsa Craig SPA is located 142.3 km away from the Morgan Generation Assets. The SPA is an island rising to 338 m, situated in the outer part of the Firth of Clyde. It is encircled by cliffs up to 100 m high, providing nesting sites for a variety of seabirds.

1.2.4.40 The HRA Stage 1 Screening Report (Document Reference E1.4) could not rule out the risk of LSE on the Ailsa Craig SPA. The impacts of the Morgan Generation Assets have been assessed with respect to the conservation objectives of this site. Seabird species that are qualifying features of this European site, and were screened into the assessment include:

- Kittiwake *Rissa tridactyla*
- Gannet *Morus bassanus*

- Breeding seabird assemblage.

1.2.4.41 The HRA Stage 2 ISAA Part 3 – SPA and Ramsar Sites Assessments (Document Reference E1.3) assessed the following impacts:

- Disturbance and displacement from airborne sound and presence of vessels and infrastructure (operations and maintenance)
- Collision risk (For gannet, kittiwake and breeding seabird assemblage only during operations and maintenance)
- In-combination collision risk (For gannet, kittiwake and breeding seabird assemblage only during operations and maintenance)
- In-combination disturbance and displacement effects from airborne sound and presence of vessels and infrastructure (operations and maintenance).

1.2.4.42 Based on the evidence detailed in the HRA Stage 2 ISAA Part 3 – SPA and Ramsar Sites Assessments (Document Reference E1.3), Section 1.5: Assessment of potential Adverse Effect on Integrity: offshore ornithology, the assessment concluded that the conservation objectives for the site would not be undermined and there would be no Adverse Effect on the Integrity of the Ailsa Craig SPA as a result of the Morgan Generation Assets alone, or in combination with other plans and projects.

Howth Head Coast SPA

1.2.4.43 The Howth Head Coast SPA is located 193.3 km away from the Morgan Generation Assets, situated on the northern side of Dublin Bay, is a significant coastal site with unique ecological features. The SPA comprises sea cliffs extending from just east of the Nose of Howth to the tip of the Bailey Lighthouse peninsula.

1.2.4.44 The HRA Stage 1 Screening Report (Document Reference E1.4) could not rule out the risk of LSE on the Howth Head Coast SPA. The impacts of the Morgan Generation Assets have been assessed with respect to the conservation objectives of this site. Seabird species that are qualifying features of this European site, and were screened into the assessment include:

- Kittiwake *Rissa tridactyla.*

1.2.4.45 The HRA Stage 2 ISAA Part 3 – SPA and Ramsar Sites Assessments (Document Reference E1.3) assessed the following impacts:

- Disturbance and displacement from airborne sound and presence of vessels and infrastructure (operations and maintenance)
- Collision risk (operations and maintenance)
- In-combination collision risk (operations and maintenance)
- In-combination disturbance and displacement effects from airborne sound and presence of vessels and infrastructure (operations and maintenance).

1.2.4.46 Based on the evidence detailed in the HRA Stage 2 ISAA Part 3 – SPA and Ramsar Sites Assessments (Document Reference E1.3), Section 1.5: Assessment of potential Adverse Effect on Integrity: offshore ornithology, the assessment concluded that the conservation objectives for the site would not be undermined and there would be no Adverse Effect on the Integrity of the Howth Head Coast SPA as a result of the Morgan Generation Assets alone, or in combination with other plans and projects.

Wicklow Head SPA

1.2.4.47 The Wicklow Head SPA is located 165.4 km away from the Morgan Generation Assets, located in the County Wicklow, Ireland. It is a coastal SPA, which covers an area of approximately 2 km^2.

1.2.4.48 The HRA Stage 1 Screening Report (Document Reference E1.4) could not rule out the risk of LSE on the Wicklow Head SPA. The impacts of the Morgan Generation Assets have been assessed with respect to the conservation objectives of this site. Seabird species that are qualifying features of this European site, and were screened into the assessment include:

- Kittiwake *Rissa tridactyla*.

1.2.4.49 The HRA Stage 2 ISAA Part 3 – SPA and Ramsar Sites Assessments (Document Reference E1.3) assessed the following impacts:

- Disturbance and displacement from airborne sound and presence of vessels and infrastructure (operations and maintenance)
- Collision risk (operations and maintenance)
- In-combination collision risk (operations and maintenance)
- In-combination disturbance and displacement effects from airborne sound and presence of vessels and infrastructure (operations and maintenance).

1.2.4.50 Based on the evidence detailed in the HRA Stage 2 ISAA Part 3 – SPA and Ramsar Sites Assessments (Document Reference E1.3), Section 1.5: Assessment of potential Adverse Effect on Integrity: offshore ornithology, the assessment concluded that the conservation objectives for the site would not be undermined and there would be no Adverse Effect on the Integrity of the Wicklow Head SPA as a result of the Morgan Generation Assets alone, or in combination with other plans and projects.

Rathlin Island SPA

1.2.4.51 The Rathlin Island SPA is located 186.1 km away from the Morgan Generation Assets, situated off the north Antrim coast of Northern Ireland. The SPA is known to support a number of nationally important bird species, including migratory species and breeding seabirds.

1.2.4.52 The HRA Stage 1 Screening Report (Document Reference E1.4) could not rule out the risk of LSE on the Rathlin Island SPA. The impacts of the Morgan Generation Assets have been assessed with respect to the conservation objectives of this site. Seabird species that are qualifying features of this European site, and were screened into the assessment include:

- Kittiwake *Rissa tridactyla*
- Guillemot *Uria aalge* (non-breeding season)
- Razorbill *Alca torda* (non-breeding season)
- Breeding seabird assemblage.

1.2.4.53 The HRA Stage 2 ISAA Part 3 – SPA and Ramsar Sites Assessments (Document Reference E1.3) assessed the following impacts:

- Disturbance and displacement from airborne sound and presence of vessels and infrastructure (operations and maintenance)

- Collision risk (kittiwake and breeding seabird assemblage only in operations and maintenance)
- In-combination collision risk (kittiwake and breeding seabird assemblage only in operations and maintenance)
- In-combination disturbance and displacement effects from airborne sound and presence of vessels and infrastructure (operations and maintenance).

1.2.4.54 Based on the evidence detailed in the HRA Stage 2 ISAA Part 3 – SPA and Ramsar Sites Assessments (Document Reference E1.3), Section 1.5: Assessment of potential Adverse Effect on Integrity: offshore ornithology, the assessment concluded that the conservation objectives for the site would not be undermined and there would be no Adverse Effect on the Integrity of the Rathlin Island SPA as a result of the Morgan Generation Assets alone, or in combination with other plans and projects.

Forth Islands SPA

1.2.4.55 The Forth Islands SPA is located 219.9 km away from the Morgan Generation Assets. The SPA consists of a series of islands supporting the main seabird colonies in the Firth of Forth.

1.2.4.56 The HRA Stage 1 Screening Report (Document Reference E1.4) could not rule out the risk of LSE on the Forth Islands SPA. The impacts of the Morgan Generation Assets have been assessed with respect to the conservation objectives of this site. Seabird species that are qualifying features of this European site, and were screened into the assessment include:

- Gannet *Morus bassanus* (non-breeding seasons)
- Breeding seabird assemblage.

1.2.4.57 The HRA Stage 2 ISAA Part 3 – SPA and Ramsar Sites Assessments (Document Reference E1.3) assessed the following impacts:

- Disturbance and displacement from airborne sound and presence of vessels and infrastructure (operations and maintenance)
- Collision risk (operations and maintenance)
- In-combination collision risk (operations and maintenance)
- In-combination disturbance and displacement effects from airborne sound and presence of vessels and infrastructure (operations and maintenance).

1.2.4.58 Based on the evidence detailed in the HRA Stage 2 ISAA Part 3 – SPA and Ramsar Sites Assessments (Document Reference E1.3), Section 1.5: Assessment of potential Adverse Effect on Integrity: offshore ornithology, the assessment concluded that the conservation objectives for the site would not be undermined and there would be no Adverse Effect on the Integrity of the Forth Islands SPA as a result of the Morgan Generation Assets alone, or in combination with other plans and projects.

Flamborough and Filey Coast SPA

1.2.4.59 The Flamborough and Filey Coast SPA is located 233.5 km away from the Morgan Generation Assets, located along the Yorkshire coast between Bridlington and Scarborough. The SPA provides protection to the cliffs, which seabirds utilise for nesting habitats.

1.2.4.60 The HRA Stage 1 Screening Report (Document Reference E1.4) could not rule out the risk of LSE on the Flamborough and Filey Coast SPA. The impacts of the Morgan Generation Assets have been assessed with respect to the conservation objectives of this site. Seabird species that are qualifying features of this European site, and were screened into the assessment include:

- Kittiwake *Rissa tridactyla*
- Breeding seabird assemblage.

1.2.4.61 The HRA Stage 2 ISAA Part 3 – SPA and Ramsar Sites Assessments (Document Reference E1.3) assessed the following impacts:

- Disturbance and displacement from airborne sound and presence of vessels and infrastructure (operations and maintenance)
- Collision risk (operations and maintenance)
- In-combination collision risk (operations and maintenance)
- In-combination disturbance and displacement effects from airborne sound and presence of vessels and infrastructure (operations and maintenance).

1.2.4.62 Based on the evidence detailed in the HRA Stage 2 ISAA Part 3 – SPA and Ramsar Sites Assessments (Document Reference E1.3), Section 1.5: Assessment of potential Adverse Effect on Integrity: offshore ornithology, the assessment concluded that the conservation objectives for the site would not be undermined and there would be no Adverse Effect on the Integrity of the Flamborough and Filey Coast SPA as a result of the Morgan Generation Assets alone, or in combination with other plans and projects.

Skomer, Skokholm and the Seas off Pembrokeshire/Sgomer, Sgogwm a moroedd Benfro SPA

1.2.4.63 The Skomer, Skokholm and the Seas off Pembrokeshire/Sgomer, Sgogwn a moroedd Benfro SPA is located 252 km away from the Morgan Generation Assets, located off the south west tip of Pembrokeshire in south west Wales. The islands of Skomer and Skokholm support the largest concentration of breeding seabirds in England and Wales.

1.2.4.64 The HRA Stage 1 Screening Report (Document Reference E1.4) could not rule out the risk of LSE on the Skomer, Skokholm and the Seas off Pembrokeshire/Sgomer, Sgogwm a moroedd Benfro SPA. The impacts of the Morgan Generation Assets have been assessed with respect to the conservation objectives of this site. Seabird species that are qualifying features of this European site, and were screened into the assessment include:

- Kittiwake *Rissa tridactyla*
- Lesser black-backed gull *Larus fuscus* (non-breeding seasons)
- Guillemot *Uria aalge* (non-breeding season)
- Razorbill *Alca torda* (non-breeding seasons)
- Manx shearwater *Puffinus puffinus* (non-breeding seasons)
- Breeding seabird assemblage.

1.2.4.65 The HRA Stage 2 ISAA Part 3 – SPA and Ramsar Sites Assessments (Document Reference E1.3) assessed the following impacts:

- Disturbance and displacement from airborne sound and presence of vessels and infrastructure (kittiwake, breeding seabird assemblage, Manx shearwater and razorbill only in operations and maintenance)
- Collision risk (kittiwake, breeding seabird assemblage and lesser black-backed gull only in operations and maintenance)
- In-combination collision risk (kittiwake, breeding seabird assemblage and lesser black-backed gull only in operations and maintenance)
- In-combination disturbance and displacement effects from airborne sound and presence of vessels and infrastructure (kittiwake, breeding seabird assemblage, Manx shearwater and razorbill only in operations and maintenance)

1.2.4.66 Based on the evidence detailed in the HRA Stage 2 ISAA Part 3 – SPA and Ramsar Sites Assessments (Document Reference E1.3), Section 1.5: Assessment of potential Adverse Effect on Integrity: offshore ornithology, the assessment concluded that the conservation objectives for the site would not be undermined and there would be no Adverse Effect on the Integrity of the Skomer, Skokholm and the Seas off Pembrokeshire/Sgomer, Sgogwm a moroedd Benfro SPA as a result of the Morgan Generation Assets alone, or in combination with other plans and projects.

North Colonsay and Western Cliffs SPA

1.2.4.67 The North Colonsay and Western Cliffs SPA is located 257.6 km away from Morgan Generation Assets. The SPA covers an area of rocky coast, cliffs, and maritime heath on the island of Colonsay in Argyll, Scotland.

1.2.4.68 The HRA Stage 1 Screening Report (Document Reference E1.4) could not rule out the risk of LSE on the North Colonsay and Western Cliffs SPA. The impacts of the Morgan Generation Assets have been assessed with respect to the conservation objectives of this site. Seabird species that are qualifying features of this European site, and were screened into assessment include:

- Kittiwake *Rissa tridactyla*
- Guillemot *Uria aalge* (non-breeding season)
- Breeding seabird assemblage.

1.2.4.69 The HRA Stage 2 ISAA Part 3 – SPA and Ramsar Sites Assessments (Document Reference E1.3) assessed the following impacts:

- Disturbance and displacement from airborne sound and presence of vessels and infrastructure (operations and maintenance)
- Collision risk (operations and maintenance)
- In-combination collision risk (operations and maintenance)
- In-combination disturbance and displacement effects from airborne sound and presence of vessels and infrastructure (operations and maintenance).

1.2.4.70 Based on the evidence detailed in the HRA Stage 2 ISAA Part 3 – SPA and Ramsar Sites Assessments (Document Reference E1.3), Section 1.5: Assessment of potential Adverse Effect on Integrity: offshore ornithology, the assessment concluded that the conservation objectives for the site would not be undermined and there would be no Adverse Effect on the Integrity of the North Colonsay and Western Cliffs SPA as a

result of the Morgan Generation Assets alone, or in combination with other plans and projects.

Grassholm SPA

1.2.4.71 The Grassholm SPA is located 260.3 km away from the Morgan Generation Assets, located off Pembrokeshire, in south west Wales. The SPA is an uninhabited island, which supports a large northern gannet colony.

1.2.4.72 The HRA Stage 1 Screening Report (Document Reference E1.4) could not rule out the risk of LSE on the Grassholm SPA. The impacts of the Morgan Generation Assets have been assessed with respect to the conservation objectives of this site. Seabird species that are qualifying features of this European site, and were screened into the assessment include:

- Gannet *Morus bassanus*.

1.2.4.73 The HRA Stage 2 ISAA Part 3 – SPA and Ramsar Sites Assessments (Document Reference E1.3) assessed the following impacts:

- Disturbance and displacement from airborne sound and presence of vessels and infrastructure (operations and maintenance)
- Collision risk (operations and maintenance)
- In-combination collision risk (operations and maintenance)
- In-combination disturbance and displacement effects from airborne sound and presence of vessels and infrastructure (operations and maintenance).

1.2.4.74 Based on the evidence detailed in the HRA Stage 2 ISAA Part 3 – SPA and Ramsar Sites Assessments (Document Reference E1.3), Section 1.5: Assessment of potential Adverse Effect on Integrity: offshore ornithology, the assessment concluded that the conservation objectives for the site would not be undermined and there would be no Adverse Effect on the Integrity of the Grassholm SPA as a result of the Morgan Generation Assets alone, or in combination with other plans and projects.

Saltee Islands SPA

1.2.4.75 The Saltee Islands SPA is located 265.9 km away from the Morgan Generation Assets, located off County Wexford. The SPA consists of two main islands: Great Saltee and Little Saltee, which both have cliffs rising from the sea, as well as to an area of the surrounding seas.

1.2.4.76 The HRA Stage 1 Screening Report (Document Reference E1.4) could not rule out the risk of LSE on the Saltee Islands SPA. The impacts of the Morgan Generation Assets have been assessed with respect to the conservation objectives of this site. Seabird species that are qualifying features of this European site, and were screened into the assessment include:

- Gannet *Morus bassanus*
- Kittiwake *Rissa tridactyla*
- Guillemot *Uria aalge* (non-breeding season)
- Razorbill *Alca torda* (non-breeding season)
- Breeding seabird assemblage.

1.2.4.77 The HRA Stage 2 ISAA Part 3 – SPA and Ramsar Sites Assessments (Document Reference E1.3) assessed the following impacts:

- Disturbance and displacement from airborne sound and presence of vessels and infrastructure (operations and maintenance)
- Collision risk (operations and maintenance)
- In-combination collision risk (operations and maintenance)
- In-combination disturbance and displacement effects from airborne sound and presence of vessels and infrastructure (operations and maintenance).

1.2.4.78 Based on the evidence detailed in the HRA Stage 2 ISAA Part 3 – SPA and Ramsar Sites Assessments (Document Reference E1.3), Section 1.5: Assessment of potential Adverse Effect on Integrity: offshore ornithology, the assessment concluded that the conservation objectives for the site would not be undermined and there would be no Adverse Effect on the Integrity of the Saltee Islands SPA as a result of the Morgan Generation Assets alone, or in combination with other plans and projects.

Rum SPA

1.2.4.79 The Rum SPA is located 340.7 km away from the Morgan Generation Assets, located off the west coast of Scotland. The SPA encompasses the uninhabited island of Rum, which supports a large colony of Manx shearwater, as well as other protected seabirds

1.2.4.80 The HRA Stage 1 Screening Report (Document Reference E1.4) could not rule out the risk of LSE on the Rum SPA. The impacts of the Morgan Generation Assets have been assessed with respect to the conservation objectives of this site. Seabird species that are qualifying features of this European site, and were screened into assessment include:

- Manx shearwater *Puffinus puffinus*
- Breeding seabird assemblage.

1.2.4.81 The HRA Stage 2 ISAA Part 3 – SPA and Ramsar Sites Assessments (Document Reference E1.3) assessed the following impacts:

- Disturbance and displacement from airborne sound and presence of vessels and infrastructure (operations and maintenance)
- In-combination disturbance and displacement effects from airborne sound and presence of vessels and infrastructure (operations and maintenance).

1.2.4.82 Based on the evidence detailed in the HRA Stage 2 ISAA Part 3 – SPA and Ramsar Sites Assessments (Document Reference E1.3), Section 1.5: Assessment of potential Adverse Effect on Integrity: offshore ornithology, the assessment concluded that the conservation objectives for the site would not be undermined and there would be no Adverse Effect on the Integrity of the Rum SPA as a result of the Morgan Generation Assets alone, or in combination with other plans and projects.

Mingulay and Berneray SPA

1.2.4.83 The Mingulay and Berneray SPA is located 370.3 km away from the Morgan Generation Assets, located off the west coast of Scotland. The SPA encompasses the rugged and uninhabited islands of Mingulay and Berneray.

1.2.4.84 The HRA Stage 1 Screening Report (Document Reference E1.4) could not rule out the risk of LSE on the Mingulay and Berneray SPA. The impacts of the Morgan Generation

Assets have been assessed with respect to the conservation objectives of this site. Seabird species that are qualifying features of this European site, and were screened into assessment include:

- Guillemot *Uria aalge* (non-breeding season)
- Razorbill *Alca torda* (non-breeding season)
- Breeding seabird assemblage.

1.2.4.85 The HRA Stage 2 ISAA Part 3 – SPA and Ramsar Sites Assessments (Document Reference E1.3) assessed the following impacts:

- Disturbance and displacement from airborne sound and presence of vessels and infrastructure (operations and maintenance)
- In-combination disturbance and displacement effects from airborne sound and presence of vessels and infrastructure (operations and maintenance).

1.2.4.86 Based on the evidence detailed in the HRA Stage 2 ISAA Part 3 – SPA and Ramsar Sites Assessments (Document Reference E1.3), Section 1.5: Assessment of potential Adverse Effect on Integrity: offshore ornithology, the assessment concluded that the conservation objectives for the site would not be undermined and there would be no Adverse Effect on the Integrity of the Mingulay and Berneray SPA as a result of the Morgan Generation Assets alone, or in combination with other plans and projects.

Buchan Ness to Collieston Coast SPA

1.2.4.87 The Buchan Ness to Collieston Coast SPA is located 385.7 km away from the Morgan Generation Assets, located along the north east coast of Scotland. The habitats in the area include vegetated sea cliffs, cliff top vegetation and grassland.

1.2.4.88 The HRA Stage 1 Screening Report (Document Reference E1.4) could not rule out the risk of LSE on the Buchan Ness to Collieston Coast SPA. The impacts of the Morgan Generation Assets have been assessed with respect to the conservation objectives of this site. Seabird species that are qualifying features of this European site, and were screened into the assessment include:

- Kittiwake *Rissa tridactyla* (non-breeding seasons)
- Breeding seabird assemblage.

1.2.4.89 The HRA Stage 2 ISAA Part 3 – SPA and Ramsar Sites Assessments (Document Reference E1.3) assessed the following impacts:

- Disturbance and displacement from airborne sound and presence of vessels and infrastructure (operations and maintenance)
- Collision risk (operations and maintenance)
- In-combination collision risk (operations and maintenance)
- In-combination disturbance and displacement effects from airborne sound and presence of vessels and infrastructure (operations and maintenance).

1.2.4.90 Based on the evidence detailed in the HRA Stage 2 ISAA Part 3 – SPA and Ramsar Sites Assessments (Document Reference E1.3), Section 1.5: Assessment of potential Adverse Effect on Integrity: offshore ornithology, the assessment concluded that the conservation objectives for the site would not be undermined and there would be no Adverse Effect on the Integrity of the Buchan Ness to Collieston Coast SPA as a result

of the Morgan Generation Assets alone, or in combination with other plans and projects.

Troup, Pennan and Lion's Heads SPA

1.2.4.91 The Troup, Pennan and Lion's Heads SPA is located 414.7 km away from the Morgan Generation Assets. The SPA is a 9 km stretch of sea cliffs along the Aberdeenshire coast. These cliffs support large colonies of breeding seabirds.

1.2.4.92 The HRA Stage 1 Screening Report (Document Reference E1.4) could not rule out the risk of LSE on the Troup, Pennan and Lion's Heads SPA. The impacts of the Morgan Generation Assets have been assessed with respect to the conservation objectives of this site. Seabird species that are qualifying features of this European site, and were screened into assessment include:

- Kittiwake *Rissa tridactyla* (non-breeding seasons)
- Breeding seabird assemblage.

1.2.4.93 The HRA Stage 2 ISAA Part 3 – SPA and Ramsar Sites Assessments (Document Reference E1.3) assessed the following impacts:

- Disturbance and displacement from airborne sound and presence of vessels and infrastructure (operations and maintenance)
- Collision risk (operations and maintenance)
- In-combination collision risk (operations and maintenance)
- In-combination disturbance and displacement effects from airborne sound and presence of vessels and infrastructure (operations and maintenance).

1.2.4.94 Based on the evidence detailed in the HRA Stage 2 ISAA Part 3 – SPA and Ramsar Sites Assessments (Document Reference E1.3), Section 1.5: Assessment of potential Adverse Effect on Integrity: offshore ornithology, the assessment concluded that the conservation objectives for the site would not be undermined and there would be no Adverse Effect on the Integrity of the Troup, Pennan and Lion's Heads SPA as a result of the Morgan Generation Assets alone, or in combination with other plans and projects.

The Shiant Isles SPA

1.2.4.95 The Shiant Isles SPA is located 442.5 km away from the Morgan Generation Assets, located in the outer Hebrides in Scotland. The island is an important haven for a variety of seabird species for foraging and nesting.

1.2.4.96 The HRA Stage 1 Screening Report (Document Reference E1.4) could not rule out the risk of LSE on the Shiant Isles SPA. The impacts of the Morgan Generation Assets have been assessed with respect to the conservation objectives of this site. Seabird species that are qualifying features of this European site, and were screened into the assessment include:

- Razorbill *Alca torda* (non-breeding season)
- Breeding seabird assemblage.

1.2.4.97 The HRA Stage 2 ISAA Part 3 – SPA and Ramsar Sites Assessments (Document Reference E1.3) assessed the following impacts:

- Disturbance and displacement from airborne sound and presence of vessels and infrastructure (operations and maintenance)

- In-combination disturbance and displacement from airborne sound and presence of vessels and infrastructure (operations and maintenance).

1.2.4.98 Based on the evidence detailed in the HRA Stage 2 ISAA Part 3 – SPA and Ramsar Sites Assessments (Document Reference E1.3), Section 1.5: Assessment of potential Adverse Effect on Integrity: offshore ornithology, the assessment concluded that the conservation objectives for the site would not be undermined and there would be no Adverse Effect on the Integrity of the Shiant Isles SPA as a result of the Morgan Generation Assets alone, or in combination with other plans and projects.

East Caithness Cliffs SPA

1.2.4.99 East Caithness Cliffs SPA was located 449.8 km away from the Morgan Generation Assets. The SPA encompasses most of the sea-cliff areas between Wick and Helmsdale on the north-east coast of the Scottish mainland.

1.2.4.100 The HRA Stage 1 Screening Report (Document Reference E1.4) could not rule out the risk of LSE on the East Caithness Cliffs SPA. The impacts of the Morgan Generation Assets have been assessed with respect to the conservation objectives of this site. Seabird species that are qualifying features of this European site, and were screened into the assessment include:

- Kittiwake *Rissa tridactyla*
- Breeding seabird assemblage.

1.2.4.101 The HRA Stage 2 ISAA Part 3 – SPA and Ramsar Sites Assessments (Document Reference E1.3) assessed the following impacts:

- Disturbance and displacement from airborne sound and presence of vessels and infrastructure (operations and maintenance)
- Collision risk (operations and maintenance)
- In-combination collision risk (operations and maintenance)
- In-combination disturbance and displacement effects from airborne sound and presence of vessels and infrastructure (operations and maintenance).

1.2.4.102 Based on the evidence detailed in the HRA Stage 2 ISAA Part 3 – SPA and Ramsar Sites Assessments (Document Reference E1.3), Section 1.5: Assessment of potential Adverse Effect on Integrity: offshore ornithology, the assessment concluded that the conservation objectives for the site would not be undermined and there would be no Adverse Effect on the Integrity of the East Caithness Cliffs SPA as a result of the Morgan Generation Assets alone, or in combination with other plans and projects.

Isles of Scilly SPA/Isles of Scilly Ramsar

1.2.4.103 The Isles of Scilly SPA/Isles of Scilly Ramsar is located 464.8 km away from the Morgan Generation Assets, located off the south west coast of England. The SPA consists of over 200 low-lying granite islands and rocks, offering diverse habitats including cliffs and beaches.

1.2.4.104 The HRA Stage 1 Screening Report (Document Reference E1.4) could not rule out the risk of LSE on the Isles of Scilly SPA/Isles of Scilly Ramsar. The impacts of the Morgan Generation Assets have been assessed with respect to the SPA conservation objectives. Seabird species that are qualifying features of these European sites, and were screened into the assessment include:

- Lesser black-backed gull *Larus fuscus* (non-breeding and breeding season)
- Great black-backed gull *Larus marinus* (non-breeding season)
- Manx shearwater *Puffinus puffinus*
- Breeding seabird assemblage.

1.2.4.105 The HRA Stage 2 ISAA Part 3 – SPA and Ramsar Sites Assessments (Document Reference E1.3) assessed the following impacts:

- Disturbance and displacement from airborne sound and presence of vessels and infrastructure (Manx shearwater only in operations and maintenance)
- Collision risk (lesser black-backed gull, great black-backed gull and breeding seabird assemblage only in operations and maintenance)
- In-combination collision risk (lesser black-backed gull, great black-backed gull and breeding seabird assemblage only in operations and maintenance)
- In-combination disturbance and displacement effects from airborne sound and presence of vessels and infrastructure (Manx shearwater only in operations and maintenance).

1.2.4.106 Based on the evidence detailed in the HRA Stage 2 ISAA Part 3 – SPA and Ramsar Sites Assessments (Document Reference E1.3), Section 1.5: Assessment of potential Adverse Effect on Integrity: offshore ornithology, the assessment concluded that the conservation objectives for the site would not be undermined and there would be no Adverse Effect on the Integrity of the Isles of Scilly SPA/Isles of Scilly Ramsar as a result of the Morgan Generation Assets alone, or in combination with other plans and projects.

Seas off St Kilda SPA

1.2.4.107 The Seas off St Kilda SPA is located 474.3 km away from the Morgan Generation Assets. The SPA covers the waters around the St Kilda archipelago, situated in the Outer Hebrides in Scotland.

1.2.4.108 The HRA Stage 1 Screening Report (Document Reference E1.4) could not rule out the risk of LSE on the Seas off St Kilda SPA. The impacts of the Morgan Generation Assets have been assessed with respect to the conservation objectives of this site. Seabird species that are qualifying features of this European site, and were screened into assessment include:

- Guillemot *Uria aalge* (non-breeding season)
- Fulmar *Fulmarus glacialis*
- Gannet *Morrus bassanus.*

1.2.4.109 The HRA Stage 2 ISAA Part 3 – SPA and Ramsar Sites Assessments (Document Reference E1.3) assessed the following impacts:

- Disturbance and displacement from airborne sound and presence of vessels and infrastructure
- Collision risk (operations and maintenance)
- In-combination collision risk (operations and maintenance)
- In-combination disturbance and displacement from airborne sound and presence of vessels and infrastructure (operations and maintenance).

1.2.4.110 Based on the evidence detailed in the HRA Stage 2 ISAA Part 3 – SPA and Ramsar Sites Assessments (Document Reference E1.3), Section 1.5: Assessment of potential Adverse Effect on Integrity: offshore ornithology, the assessment concluded that the conservation objectives for the site would not be undermined and there would be no Adverse Effect on the Integrity of the Seas off St Kilda SPA as a result of the Morgan Generation Assets alone, or in combination with other plans and projects.

Handa SPA

1.2.4.111 The Handa SPA is located 480.2 km away from the Morgan Generation Assets, located off the west coast of Scotland. The SPA encompasses the rugged and uninhabited island of Handa, which supports a variety of seabird species.

1.2.4.112 The HRA Stage 1 Screening Report (Document Reference E1.4) could not rule out the risk of LSE on the Handa SPA. The impacts of the Morgan Generation Assets have been assessed with respect to the conservation objectives of this site. Seabird species that are qualifying features of this European site, and were screened into the assessment include:

- Guillemot *Uria aalge* (non-breeding season)
- Razorbill *Alca torda* (non-breeding season)
- Breeding seabird assemblage.

1.2.4.113 The HRA Stage 2 ISAA Part 3 – SPA and Ramsar Sites Assessments (Document Reference E1.3) assessed the following impacts:

- Disturbance and displacement from airborne sound and presence of vessels and infrastructure (operations and maintenance)
- In-combination disturbance and displacement effects from airborne sound and presence of vessels and infrastructure (operations and maintenance).

1.2.4.114 Based on the evidence detailed in the HRA Stage 2 ISAA Part 3 – SPA and Ramsar Sites Assessments (Document Reference E1.3), Section 1.5: Assessment of potential Adverse Effect on Integrity: offshore ornithology, the assessment concluded that the conservation objectives for the site would not be undermined and there would be no Adverse Effect on the Integrity of the Handa SPA as a result of the Morgan Generation Assets alone, or in combination with other plans and projects.

St Kilda SPA

1.2.4.115 The St Kilda SPA is located 490.4 km away from the Morgan Generation Assets, located in the Outer Hebrides in Scotland. The area contains a large number of crags and ledges as well as cliffs and sea caves.

1.2.4.116 The HRA Stage 1 Screening Report (Document Reference E1.4) could not rule out the risk of LSE on the St Kilda SPA. The impacts of the Morgan Generation Assets have been assessed with respect to the conservation objectives of this site. Seabird species that are qualifying features of this European site, and were screened into the assessment include:

- Guillemot *Uria aalge* (non-breeding season)
- Gannet *Morus bassanus* (non-breeding season)
- Fulmar *Fulmarus glacialis*
- Manx shearwater *Puffinus puffinus*

- Breeding seabird assemblage.

1.2.4.117 The HRA Stage 2 ISAA Part 3 – SPA and Ramsar Sites Assessments (Document Reference E1.3) assessed the following impacts:

- Disturbance and displacement from airborne sound and presence of vessels and infrastructure (operations and maintenance)
- Collision risk (gannet and breeding seabird assemblage only in operations and maintenance)
- In-combination collision risk (gannet and breeding seabird assemblage only in operations and maintenance)
- In-combination disturbance and displacement effects from airborne sound and presence of vessels and infrastructure (operations and maintenance).

1.2.4.118 Based on the evidence detailed in the HRA Stage 2 ISAA Part 3 – SPA and Ramsar Sites Assessments (Document Reference E1.3), Section 1.5: Assessment of potential Adverse Effect on Integrity: offshore ornithology, the assessment concluded that the conservation objectives for the site would not be undermined and there would be no Adverse Effect on the Integrity of the St Kilda SPA as a result of the Morgan Generation Assets alone, or in combination with other plans and projects.

Cape Wrath SPA

1.2.4.119 The Cape Wrath SPA is located 502.3 km away from the Morgan Generation Assets, located in north west Scotland. The area of the SPA consists of rugged cliffs and rocky shore, which are used by seabirds for nesting and feeding.

1.2.4.120 The HRA Stage 1 Screening Report (Document Reference E1.4) could not rule out the risk of LSE on the Cape Wrath SPA. The impacts of the Morgan Generation Assets have been assessed with respect to the conservation objectives of this site. Seabird species that are qualifying features of this European site, and were screened into the assessment include:

- Kittiwake *Rissa tridactyla* (non-breeding seasons)
- Guillemot *Uria aalge* (non-breeding seasons)
- Breeding seabird assemblage.

1.2.4.121 The HRA Stage 2 ISAA Part 3 – SPA and Ramsar Sites Assessments (Document Reference E1.3) assessed the following impacts:

- Disturbance and displacement from airborne sound and presence of vessels and infrastructure (operations and maintenance)
- Collision risk (kittiwake and breeding seabird assemblage only in operations and maintenance)
- In-combination collision risk (kittiwake and breeding seabird assemblage only in operations and maintenance)
- In-combination disturbance and displacement effects from airborne sound and presence of vessels and infrastructure (operations and maintenance).

1.2.4.122 Based on the evidence detailed in the HRA Stage 2 ISAA Part 3 – SPA and Ramsar Sites Assessments (Document Reference E1.3), Section 1.5: Assessment of potential Adverse Effect on Integrity: offshore ornithology, the assessment concluded that the conservation objectives for the site would not be undermined and there would be no

Adverse Effect on the Integrity of the Cape Wrath SPA, as a result of the Morgan Generation Assets alone, or in combination with other plans and projects.

Flannan Isles SPA

1.2.4.123 The Flannan Isles SPA is located 510.8 km away from the Morgan Generation Assets, situated in north west Scotland. The area of the SPA consists of rugged cliffs and rocky shore, which are used by seabirds for nesting and feeding.

1.2.4.124 The HRA Stage 1 Screening Report (Document Reference E1.4) could not rule out the risk of LSE on the Flannan Isles SPA. The impacts of the Morgan Generation Assets have been assessed with respect to the conservation objectives of this site. Seabird species that are qualifying features of this European site, and were screened into the assessment include:

- Guillemot *Uria aalge* (non-breeding seasons)
- Breeding seabird assemblage.

1.2.4.125 The HRA Stage 2 ISAA Part 3 – SPA and Ramsar Sites Assessments (Document Reference E1.3) assessed the following impacts:

- Disturbance and displacement from airborne sound and presence of vessels and infrastructure (operations and maintenance)
- In-combination disturbance and displacement effects from airborne sound and presence of vessels and infrastructure (operations and maintenance).

1.2.4.126 Based on the evidence detailed in the HRA Stage 2 ISAA Part 3 – SPA and Ramsar Sites Assessments (Document Reference E1.3), Section 1.5: Assessment of potential Adverse Effect on Integrity: offshore ornithology, the assessment concluded that the conservation objectives for the site would not be undermined and there would be no Adverse Effect on the Integrity of the Flannan Isles SPA as a result of the Morgan Generation Assets alone, or in combination with other plans and projects, situated.

Sule Skerry and Sule Stack SPA

1.2.4.127 The Sule Skerry and Sule Stack SPA is located 548.9 km away from the Morgan Generation Assets, situated in the north west of Scotland. The SPA consists of a larger low-lying islet and a higher bare rock stack with rugged cliffs.

1.2.4.128 The HRA Stage 1 Screening Report (Document Reference E1.4) could not rule out the risk of LSE on the Sule Skerry and Sule Stack SPA. The impacts of the Morgan Generation Assets have been assessed with respect to the conservation objectives of this site. Seabird species that are qualifying features of this European site, and were screened into assessment include:

- Guillemot *Uria aalge* (non-breeding season)
- Gannet *Morus bassanus* (non-breeding seasons)
- Breeding seabird assemblage.

1.2.4.129 The HRA Stage 2 ISAA Part 3 – SPA and Ramsar Sites Assessments (Document Reference E1.3) assessed the following impacts:

- Disturbance and displacement from airborne sound and presence of vessels and infrastructure (operations and maintenance)
- Collision risk (operations and maintenance)

- In-combination collision risk (operations and maintenance)
- In-combination disturbance and displacement effects from airborne sound and presence of vessels and infrastructure (operations and maintenance).

1.2.4.130 Based on the evidence detailed in the HRA Stage 2 ISAA Part 3 – SPA and Ramsar Sites Assessments (Document Reference E1.3), Section 1.5: Assessment of potential Adverse Effect on Integrity: offshore ornithology, the assessment concluded that the conservation objectives for the site would not be undermined and there would be no Adverse Effect on the Integrity of the Sule Skerry and Sule Stack SPA as a result of the Morgan Generation Assets alone, or in combination with other plans and projects.

North Rona and Sula Sgeir SPA

1.2.4.131 The North Rona and Sula Sgeir SPA is located 567.8 km away from the Morgan Generation Assets, situated in north west Scotland. The rugged cliffs and rocky shores of North Rona and Sula Sgeir SPA serve as nesting and feeding grounds for a variety of bird species.

1.2.4.132 The HRA Stage 1 Screening Report (Document Reference E1.4) could not rule out the risk of LSE on the North Rona and Sula Sgeir SPA. The impacts of the Morgan Generation Assets have been assessed with respect to the conservation objectives of this site. Seabird species that are qualifying features of this European site, and were screened into the assessment include:

- Gannet *Morus bassanus* (non-breeding seasons)
- Breeding seabird assemblage.

1.2.4.133 The HRA Stage 2 ISAA Part 3 – SPA and Ramsar Sites Assessments (Document Reference E1.3) assessed the following impacts:

- Disturbance and displacement from airborne sound and presence of vessels and infrastructure (operations and maintenance)
- Collision risk (operations and maintenance)
- In-combination collision risk (operations and maintenance)
- In-combination disturbance and displacement effects from airborne sound and presence of vessels and infrastructure (operations and maintenance).

1.2.4.134 Based on the evidence detailed in the HRA Stage 2 ISAA Part 3 – SPA and Ramsar Sites Assessments (Document Reference E1.3), Section 1.5: Assessment of potential Adverse Effect on Integrity: offshore ornithology, the assessment concluded that the conservation objectives for the site would not be undermined and there would be no Adverse Effect on the Integrity of the North Rona and Sula Sgeir SPA as a result of the Morgan Generation Assets alone, or in combination with other plans and projects.

West Westray SPA

1.2.4.135 The West Westray SPA is located 580.3 km away from the Morgan Generation Assets. The SPA is an 8 km stretch of sea cliffs, along with the adjacent grassland and heathland, situated of the island of Westray in Orkney.

1.2.4.136 HRA Stage 1 Screening Report (Document Reference E1.4) could not rule out the risk of LSE on the West Westray SPA. The impacts of the Morgan Generation Assets have been assessed with respect to the conservation objectives of this site. Seabird species

that are qualifying features of this European site, and were screened into assessment include:

- Kittiwake *Rissa tridactyla* (non-breeding seasons)
- Breeding seabird assemblage.

1.2.4.137 The HRA Stage 2 ISAA Part 3 – SPA and Ramsar Sites Assessments (Document Reference E1.3) assessed the following impacts:

- Disturbance and displacement from airborne sound and presence of vessels and infrastructure (operations and maintenance)
- Collision risk (operations and maintenance)
- In-combination collision risk (operations and maintenance)
- In-combination disturbance and displacement effects from airborne sound and presence of vessels and infrastructure (operations and maintenance).

1.2.4.138 Based on the evidence detailed in the HRA Stage 2 ISAA Part 3 – SPA and Ramsar Sites Assessments (Document Reference E1.3), Section 1.5: Assessment of potential Adverse Effect on Integrity: offshore ornithology, the assessment concluded that the conservation objectives for the site would not be undermined and there would be no Adverse Effect on the Integrity of the West Westray SPA as a result of the Morgan Generation Assets alone, or in combination with other plans and projects.

Hermaness, Saxa Vord and Valla Field SPA

1.2.4.139 The Hermaness, Saxa Vord and Valla Field SPA is located 763.5 km away from the Morgan Generation Assets, situated in the north west corner of the island of Unst, in Shetland. The SPA consists of 100 to 200 m high sea cliffs and adjoining areas of grassland, heath, and blanket bog.

1.2.4.140 The HRA Stage 1 Screening Report (Document Reference E1.4) could not rule out the risk of LSE on the Hermaness, Saxa Vord and Valla Field SPA. The impacts of the Morgan Generation Assets have been assessed with respect to the conservation objectives of this site. Seabird species that are qualifying features of this European site, and were screened into assessment include:

- Gannet *Morus bassanus* (non-breeding seasons)
- Breeding seabird assemblage.

1.2.4.141 The HRA Stage 2 ISAA Part 3 – SPA and Ramsar Sites Assessments (Document Reference E1.3) assessed the following impacts:

- Disturbance and displacement from airborne sound and presence of vessels and infrastructure (operations and maintenance)
- Collision risk (operations and maintenance)
- In-combination collision risk (operations and maintenance)
- In-combination disturbance and displacement effects from airborne sound and presence of vessels and infrastructure (operations and maintenance).

1.2.4.142 Based on the evidence detailed in the HRA Stage 2 ISAA Part 3 – SPA and Ramsar Sites Assessments (Document Reference E1.3), Section 1.5: Assessment of potential Adverse Effect on Integrity: offshore ornithology, the assessment concluded that the conservation objectives for the site would not be undermined and there would be no Adverse Effect on the Integrity of the Hermaness, Saxa Vord and Valla Field SPA as

a result of the Morgan Generation Assets alone, or in combination with other plans and projects.

1.3 Introduction

1.3.1 Overview of the Morgan Generation Assets

1.3.1.1 Morgan Offshore Wind Limited (the Applicant), a joint venture of bp Alternative Energy Investments Ltd. (hereafter referred to as bp) and Energie Baden-Württemberg AG (hereafter referred to as EnBW) is developing the Morgan Offshore Wind Project Generation Assets (hereafter Morgan Generation Assets) (Figure 1.1). The Morgan Generation Assets is a proposed wind farm located in the east Irish Sea.

1.3.1.2 This HRA Stage 2 ISAA Report has been prepared for the generation assets (Figure 1.1) of the Morgan Offshore Wind Project. The key components of the Morgan Generation Assets include:

- Offshore wind turbines
- Foundations (for wind turbines and Offshore Substation Platforms (OSPs))
- Scour protection and cable protection
- Inter-array cables linking the individual wind turbines to the OSPs
- Inter-connector cables.

1.3.1.3 Morgan Offshore Wind Ltd and Morecambe Offshore Windfarm Ltd are seeking a separate consent for the Morgan and Morecambe Offshore Wind Farms: Transmission Assets (hereafter referred to as the Transmission Assets). The consent is sought for the shared offshore export cable corridors to landfall and the shared onshore export cable corridors to onshore substation(s), and onward connection to the National Grid electricity transmission network. Therefore, a separate HRA Stage 1 Screening Report and a HRA Stage 2 ISAA Report are required for the consent of the construction, operations and maintenance and decommissioning of the Transmission Assets. The Transmission Assets include the offshore infrastructure to export the electricity generated from the offshore wind turbines to an onshore National Grid substation and the onshore infrastructures. This will enable the export of electricity from both the Morgan Offshore Wind Project and the Morecambe Offshore Windfarm to the National Grid entry point.

1.3.1.4 The Morgan Generation Assets is an offshore generating station with a capacity exceeding 100 MW located wholly in English waters. It is therefore a Nationally Significant Infrastructure Project as defined by section 15(3) of the Planning Act 2008 (as amended) (the 2008 Act). There is therefore a requirement to submit an application for a Development Consent Order (DCO) to the Planning Inspectorate to be decided by the Secretary of State for the Department for Energy Security and Net Zero. The application for development consent for the Morgan Generation Assets will cover all aspects of the Morgan Generation Assets included within the Morgan Array Area.

1.3.1.5 Marine licences are required before carrying out any licensable marine activity under the Marine and Coastal Access Act 2009. Marine licences can be deemed under the DCO for licensable activities in English offshore waters (i.e. all licensable activities related to the offshore wind farm infrastructure located within the Morgan Array Area).

1.3.1.6 This HRA Stage 2 ISAA has been prepared for the DCO and marine licences applications alongside the Environmental Statement.

1.3.2 Project description of the Morgan Generation Assets

1.3.2.1 An overview of the Morgan Generation Assets is outlined in the paragraphs below and the full project description is provided in Volume 1, Chapter 3: Project description of the Environmental Statement (Document Reference F1.3).

1.3.2.2 The Morgan Array Area (i.e. the area within which the offshore wind turbines will be located) is 280 km^2 in area and is located in the east Irish Sea, 22.22 km (12 nautical miles (nm)) from the Isle of Man, 37.13 km (19.6 nm) from the northwest coast of England and 58.5 km (31.6 nm) from the Welsh coastline (Anglesey) (when measured from Mean High Water Springs (MHWS)). The Morgan Generation Assets is located wholly within English offshore waters (beyond 12 nm from the English coast).

1.3.2.3 The Morgan Generation Assets will consist of up to 96 wind turbines. The maximum proposed number of turbines has been reduced from 107 proposed in the Preliminary Environmental Impact Report (PEIR). The final capacity of the Morgan Generation Assets will be determined based on available technology and constrained by the design envelope presented in Volume 1, Chapter 3: Project description of the Environmental Statement (Document Reference F1.3). The offshore infrastructure will also include up to 60 km of interconnector cable and 390 km of inter-array cable.

1.3.2.4 The key components of the Morgan Generation Assets are shown in Figure 1.2 and presented in Table 1.1.

1.3.2.5 The Applicant intends to commence construction of the Morgan Generation Assets in 2026 and for it to be fully operational by 2030 to help meet the United Kingdom (UK) Government renewable energy targets.

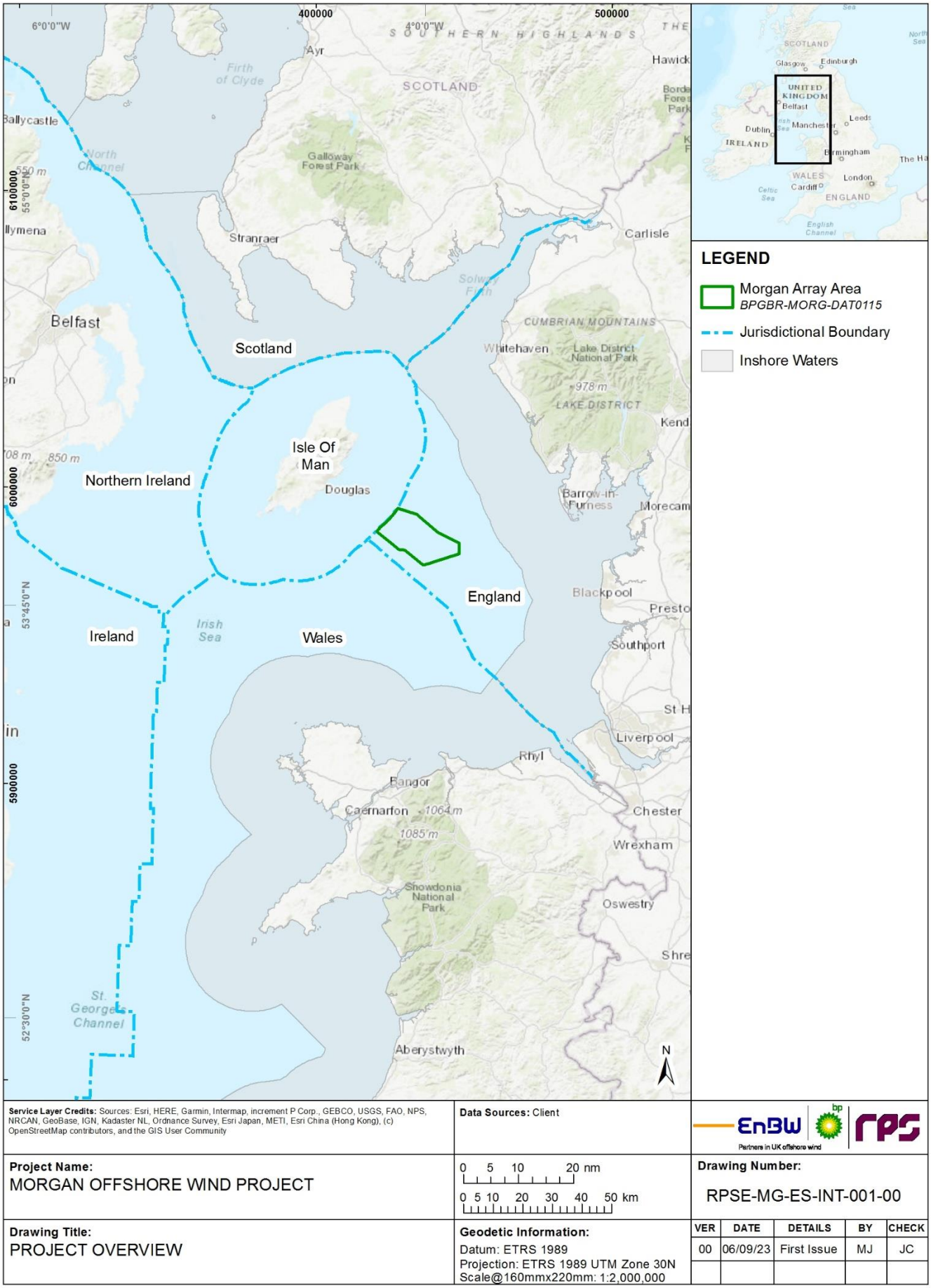
1.3.2.6 Although The Crown Estate (TCE) lease for the Morgan Generation Assets is 60 years, the design life of the Morgan Generation Assets is expected to be 35 years.

1.3.2.7 The assessment presented in the HRA Stage 2 ISAA – Part 2 SAC Assessments and Part 3 SPA and Ramsar Sites Assessments (Document Reference E1.2, E1.3) have been based on a realistic Maximum Design Scenario (MDS). Each MDS has been derived from the design envelope for the Morgan Generation Assets and is presented within the relevant receptor chapters. Volume 1, Chapter 3: Project description of the Environmental Statement (Document Reference F1.3) describes the Morgan Generation Assets design and identifies the range of potential parameters for all relevant components. The MDS for each of the potential impacts is tabulated separately in each of the receptor sections in the relevant parts of the HRA Stage 2 ISAA – Part 2 SAC Assessments (Document Reference E1.2) and Part 3 – SPA and Ramsar Sites Assessments (Document Reference E1.3), according to the effect-pathway under consideration.

Table 1.1: Key parameters for the Morgan Generation Assets.

Parameter	Value
Morgan Array Area (km^2)	280
Average water depth (m Lowest Astronomical Tide (LAT))	-38.27
Maximum number of wind turbines	96
Maximum blade tip height above LAT (m)	364
Maximum number of OSPs	4
Maximum length of inter-array cables (km)	390

Parameter	Value
Maximum length of interconnector cables (km)	60



Service Layer Credits: Sources: Esri, HERE, Garmin, Intermap, increment P Corp., GEBCO, USGS, FAO, NPS, NRCAN, GeoBase, IGN, Kadaster NL, Ordnance Survey, Esri Japan, METI, Esri China (Hong Kong), (c) OpenStreetMap contributors, and the GIS User Community

Data Sources: Client

Project Name:
MORGAN OFFSHORE WIND PROJECT

0 5 10 20 nm
0 5 10 20 30 40 50 km

Drawing Number:
RPSE-MG-ES-INT-001-00

Drawing Title:
PROJECT OVERVIEW

Geodetic Information:
Datum: ETRS 1989
Projection: ETRS 1989 UTM Zone 30N
Scale@160mmx220mm: 1:2,000,000

VER	DATE	DETAILS	BY	CHECK
00	06/09/23	First Issue	MJ	JC

Figure 1.1: Morgan Offshore Wind Project overview.

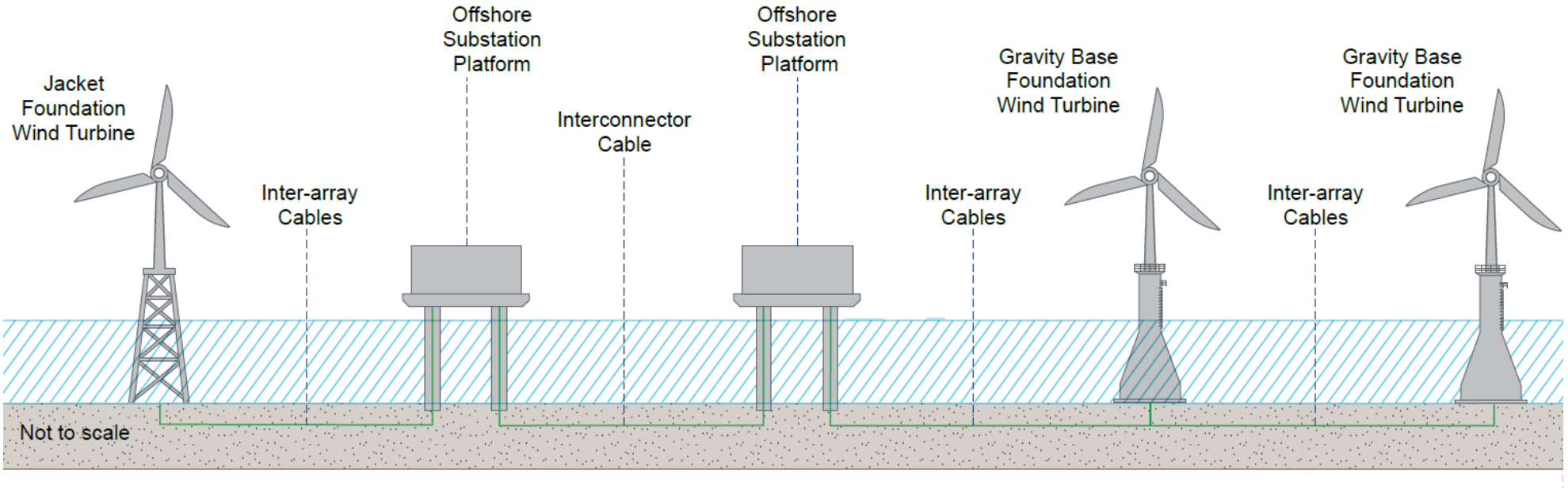


Figure 1.2: Overview of the key components of the Morgan Generation Assets infrastructure.

1.3.3 Overview of the Habitats Regulations Assessment

1.3.3.1 The requirement and process for the consideration of potential impacts of plans and projects on European sites have followed the European Union's (EU) Habitats Directive (Directive 92/43/EEC). In terrestrial areas of the UK and territorial waters out to 12 nm, the land and marine aspects of Habitats Directive and certain elements of the Wild Birds Directive (Directive 2009/147/EC) are transposed into UK law through The Conservation of Habitats and Species Regulations 2017 as amended by the Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019. In waters beyond 12 nm, The Conservation of Offshore Marine Habitats and Species Regulations 2017 (the Offshore Habitats Regulations) apply, which transpose the Habitats and Birds Directives into national law. These regulations are together referred to as the Habitats Regulations.

1.3.3.2 Under the Habitats Regulations, an Appropriate Assessment must be carried out on all plans and projects that are likely to have a significant effect on a European site. European sites include SACs, candidate SACs (cSACs), SCIs, Special Protection Areas (SPAs) and as a matter of policy (Defra, 2021), possible SACs (pSACs) and potential SPAs (pSPAs). In the UK, the requirements of the Habitats Regulations are also extended to consider the effects on Ramsar sites (listed or proposed under the Ramsar Convention on Wetlands of International Importance) and sites which are used to compensate for adverse impacts on other European sites. These sites in the UK now form part of the National Site Network but the term 'European site' has been retained for sites protected in European Member States, England and Wales and the rest of the UK in accordance with guidance issued by the UK Government on the changes made by the Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019 to the Conservation of Habitats and Species Regulations 2017 (as amended) (Defra, 2021).

1.3.3.3 The Defra (2021) guidance outlines that the HRA process can have up to three stages, as outlined below, where the outcome of each successive stage determines whether a further stage in the process is required:

1. Screening
2. Appropriate Assessment
3. Derogation.

1.3.3.4 Further information on HRA methods, guidance and case law is provided in section 1.4.3.

1.3.4 Purpose of the ISAA

1.3.4.1 This HRA Stage 2 ISAA has been prepared by RPS and NIRAS, on behalf of the Applicant, to support the HRA under Section 63 of the Conservation of Habitats and Species Regulations 2017 as amended by the Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019 and Section 28 of the Conservation of Offshore Marine Habitats and Species Regulations 2017 for the Morgan Generation Assets.

1.3.4.2 This HRA Stage 2 ISAA builds upon the HRA Stage 1 Screening Report (Document Reference E1.4) and considers whether the Morgan Generation Assets could have an adverse effect, either alone or in-combination with other plans or projects, on the integrity of any European site. This report will provide the Competent Authority with the information required to undertake an HRA Stage 2 Appropriate Assessment (see section 1.4 for more detail on the HRA process).

1.3.4.3 The scope of this ISAA covers all relevant European sites and designated features where LSE have been identified due to the potential impacts arising from the Morgan Generation Assets acting either alone, or in-combination with other plans and projects. This includes impacts on both 'offshore' European sites and features (seaward of MHWS), and the potential impacts of offshore and intertidal infrastructure seaward of MHWS and onshore infrastructure on 'onshore' European sites (landward of Mean Low Water Springs).

1.3.5 Key changes to the HRA Stage 2 ISAA since PEIR

1.3.5.1 The draft HRA Stage 2 ISAA that accompanied the PEIR has been updated following stakeholder feedback and additional data analysis for the Application. The main changes, which are reflected in the HRA Stage 2 ISAA submitted with the application, are detailed below:

- Updates to the MDS used for assessments for the Morgan Generation Assets including updates to the Morgan Generation Assets Boundary and project parameters. These are outlined in the HRA Stage 2 ISAA Part 2 – SAC assessments (Document Reference E1.2) and HRA Stage 2 ISAA Part 3 – SPA and Ramsar Sites assessments (Document Reference E1.3)
- Inclusion of the outputs of the project-specific physical processes modelling in the HRA Stage 1 Screening Report (Document Reference E1.4) to improve the evidence base used to identify the European sites with Annex II fish features carried forward to the Appropriate Assessment in the HRA Stage 2 ISAA Part 2 – SAC assessments (Document Reference E1.2)
- The inclusion of the vessel uplift values to quantify the increase in the number of vessels versus baseline values for the Morgan Array Area in the HRA Stage 1 Screening Report (Document Reference E1.4) to justify screening conclusions for LSE for Annex II marine mammals, which were carried forward to the Appropriate Assessment in the HRA Stage 2 ISAA Part 2 – SAC assessments (Document Reference E1.2)
- The updated conservation objectives for the Dee Estuary/Aber Dyfrdwy SAC have been adopted in the HRA Stage 2 ISAA Part 2 – SAC assessments (Document Reference E1.2) and HRA Stage 2 ISAA Part 3 – SPA and Ramsar Sites assessments (Document Reference E1.3), as requested by NRW (see S42 responses included in the HRA Stage 2 ISAA Part 2 – SAC assessments (Document Reference E1.2) and the HRA Stage 2 ISAA Part 3 – SPA and Ramsar Sites assessments (Document Reference E1.3)
- Change to approach for assessment of underwater sound resulting from piling for Annex II marine mammals and use of the unweighted 143 dB re 1µPa SEL_{ss} sound threshold in addition to Effective Deterrence Range approach, as requested by the Marine Mammals Expert Working Group (EWG)
- Change to the approach for the assessment of SPAs screened into the Appropriate Assessment in HRA Stage 2 ISAA Part 3 – SPA and Ramsar Sites assessments (Document Reference E1.3), as agreed with the Offshore Ornithology EWG. This includes:
  - Where the apportioning shows 0 birds impacted on a SPA, the qualifying features will be screened out at LSE
  - This approach does not apply to SPAs where the conservation objectives are not related to populations impacted by displacement/collision risk, for example

Liverpool Bay SPA. The approach to these sites is unaffected and they will be fully assessed as was done for PEIR

– For birds during the non-breeding season the approach which has been adopted is based on Natural England, the JNCC and NRW feedback and involves starting with the BDMPS areas, and for SPAs in foraging ranges or breeding colonies, where a non-breeding population of a SPA contributes less than 1% of the BDMPS, this SPA/feature is screened out. Where the SPA population represents more than 1% of the BDMPS, it's screened in. That way the key SPAs in the region are screened in for birds during the non-breeding season.

1.4 The Habitats Regulations Assessment process

1.4.1 Legislative context

1.4.1.1 The Habitats Directive (92/43/EEC) on the conservation of natural habitats and of wild fauna and flora, protects habitats and species of European nature conservation importance. Together with Council Directive (2009/147/EC) on the conservation of wild birds (the 'Birds Directive'), the Habitats Directive provide the EU's legal framework for the protection of wild fauna and flora and birds and establishes a network of internationally important sites, designated for their ecological status. This network of designated sites includes:

- SACs which are designated under the Habitats Directive and promote the protection of flora, fauna and habitats
- SPAs which are designated under the Birds Directive in order to protect rare, vulnerable and migratory birds.

1.4.1.2 In terrestrial areas of the UK and territorial waters out to 12 nm, the land and marine aspects of the Habitats Directive and certain elements of the Birds Directive are transposed into UK law through The Conservation of Habitats and Species Regulations 2017 (as amended). In waters beyond 12 nm, The Conservation of Offshore Marine Habitats and Species Regulations 2017 (the Offshore Habitats Regulations) apply, which transpose the Habitats and Birds Directives into national law.

1.4.1.3 The UK is no longer an EU Member State, but the Habitats Directive, as implemented by the Habitats Regulations, continues to provide the legislative framework for HRA in the UK. The HRA process implemented under the Habitats Regulations continues to apply (subject to minor changes effected by the Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019 and the UK is bound by HRA judgments handed down by The Court of Justice of the European Union (CJEU) prior to 31 to December 2020[1].

1.4.1.4 The objective of the Habitats Regulations is to conserve, at a Favourable Conservation Status, those qualifying habitats and species and supporting habitats of qualifying species listed in Annexes I and II of the Habitats Directive and Annex I of the Birds Directive. Post EU Exit, the Habitats Regulations continue to refer to Annexes I and II

[1] The UK Supreme Court may depart from binding pre-EU Exit case law if they consider it 'right to do so' and the Inner House of the Court of Session may depart from such case law in certain circumstances.

of the Habitats Directive and Annex I of the Birds Directive and as such, reference is made to the annexes of the Habitats and Birds Directives in this HRA Stage 2 ISAA.

1.4.1.5 In addition to sites formally defined as European sites in the Habitats Regulations, UK Government policy (ODPM Circular 06/2005) states that Wetlands of International Importance listed and proposed under the Ramsar Convention 1971 (Ramsar sites) are afforded the same protection. As a matter of policy, the UK Government also affords sites going through the formal designation process (i.e. pSPAs, cSACs and pSACs), SCIs and potential Ramsar sites, the same level of protection.

1.4.1.6 Under the Habitats Regulations, before granting approval (i.e. planning permissions, licenses and consents) for a development likely to have a significant effect on an SAC or SPA/Ramsar site, an Appropriate Assessment must be made by the Competent Authority, of the proposed plan or project's potential for adverse effects on integrity of the site in view of that site's conservation objectives.

1.4.2 European sites (post EU exit)

1.4.2.1 European sites (SACs and SPAs) in the UK no longer form part of the EU's Natura 2000 ecological network. The changes made by the Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019 created a National Site Network on land and at sea, including both the inshore and offshore marine areas in the UK. The National Site Network comprises of European sites (SACs and SPAs) in the UK that already existed (i.e. were established under the Habitats or Birds Directives) on 31 December 2020 (or proposed to the European Commission (EC) before that date) and any new sites designated under the Habitats Regulations under an amended designation process.

1.4.2.2 Ramsar sites do not form part of the National Site Network. Many Ramsar sites overlap with SACs and SPAs and all Ramsar sites remain protected in the same way as SACs and SPAs.

1.4.3 The HRA process

1.4.3.1 Regulation 28 of the Conservation of Offshore Marine Habitats and Species Regulations 2017 (the Offshore Habitats Regulations) and Regulation 63 of the Conservation of Habitats and Species Regulations 2017, require that wherever a plan or project that is not directly connected to, or necessary for, the management of a European site is likely to have a significant effect on the conservation objectives of the site (directly, indirectly, alone or in-combination with other plans or projects), an 'Appropriate Assessment' of the implications of the plan or project for that site in view of that site's conservation objectives must be undertaken by the Competent Authority before consent or authorisation can be given for the plan or project.

1.4.3.2 The Habitats Regulations make it clear that the person applying for the consent of the plan or project must provide such information as the Competent Authority may reasonably require for the purposes of the assessment. This HRA Stage 2 ISAA provides this information.

1.4.3.3 HRA is a multi-stage process which helps to determine LSE, assesses adverse impact on the integrity of a European site, and examines alternative solutions and provides justification of Imperative Reasons of Overriding Public Interest, as required. The Defra (2021) guidance describes that the process can have up to three stages as outlined below and shown in Figure 1.3:

- Screening - the first stage involves a screening for LSE which is a simple assessment to check or screen if, in the absence of mitigation, a proposal:
  - Is directly connected with or necessary for the conservation management of a European site
  - Risks having a significant effect on a European site on its own or in-combination with other proposals
- Appropriate Assessment - the second stage is an Appropriate Assessment, which must be carried out if it is decided that there is a risk of a LSE on a European site or if there is not enough evidence to rule out a risk (as required by Article 6(3) of the Habitats Directive). The Appropriate Assessment should assess the LSEs of a proposal on the integrity of the site and its conservation objectives and consider ways to avoid or reduce (mitigate) any potential for an 'Adverse Effect on the Integrity of the site'
- Derogations - the third stage is known as a derogation (as outlined in Article 6(4) of the Habitats Directive) where, in certain circumstances, a proposal that has failed the integrity test may be allowed to go ahead. To decide if the proposal qualifies for a derogation, three legal tests must be applied. All three tests must be passed in sequence for a derogation to be granted:
  - There are no feasible alternative solutions that would be less damaging or avoid damage to the site
  - The proposal needs to be carried out for imperative reasons of overriding public interest
  - The necessary compensatory measures can be secured.

1.4.3.4 This HRA Stage 2 ISAA considers the second stage 'Appropriate Assessment' in the HRA process in Figure 1.3 which seeks to assess and decide whether the Morgan Generation Assets, alone or in combination with other projects or plans, could adversely effect the integrity of a European site.

1.4.3.5 The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019 establish management objectives for the National Site Network. These are called the network objectives. The objectives in relation to the National Site Network are to:

- Maintain or restore certain habitats and species listed in the Habitats Directive to favourable conservation status
- Contribute to ensuring the survival and reproduction of certain species of wild bird in their area of distribution and to maintaining their populations at levels which correspond to ecological, scientific and cultural requirements, while taking account of economic and recreational requirements.

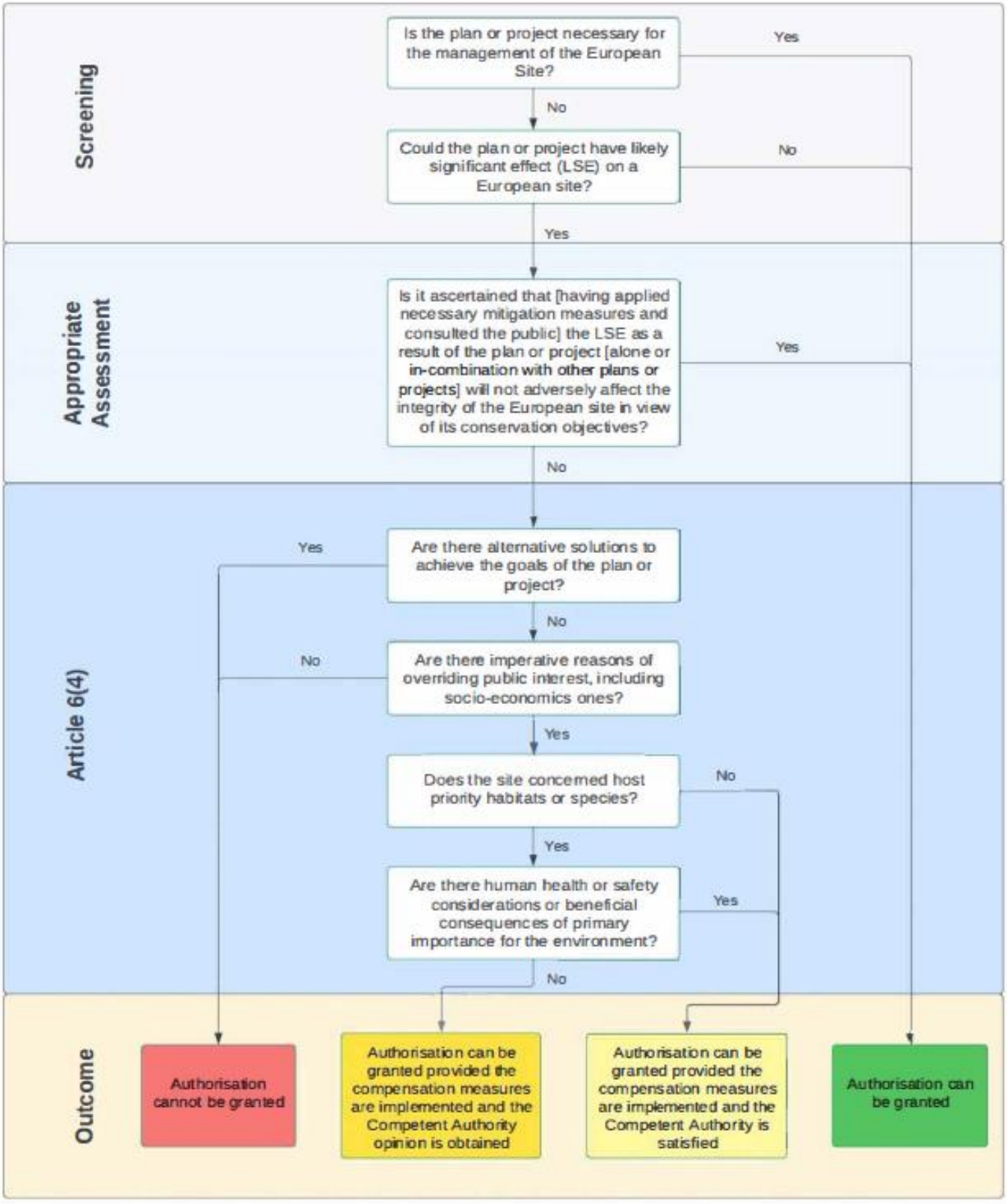


Figure 1.3: Stages in the HRA process (adapted from European Commission, 2021).

1.4.4 The Crown Estate Plan-Level HRA

1.4.4.1 TCE, in its role as Competent Authority, has conducted a Plan-Level HRA for the Offshore Wind Leasing Round 4. The Plan-Level HRA assessed the potential impacts

of the six potential offshore wind projects identified through the Offshore Wind Leasing Round 4, including the Morgan Generation Assets, on the National Site Network.

1.4.4.2 The Plan-Level HRA process involved engagement and consultation with an EWG consisting of relevant UK statutory marine planning authorities, Statutory Nature Conservation Bodies (SNCBs) and relevant non-governmental organisations.

1.4.4.3 TCE's Plan-Level HRA (TCE, 2022) concluded that the possibility of an Adverse Effect on the Integrity of a site as a result of the Offshore Wind Leasing Round 4 could not be ruled out for two protected sites forming part of the National Site Network. The two protected sites, and relevant features, are: 1) Sandbank features of the Dogger Bank SAC alone and in-combination; and 2) kittiwake feature of the Flamborough and Filey Coast SPA for in-combination effects only. The TCE Plan Level HRA states that where the assessment identifies risk of an Adverse Effect on Integrity, options for mitigation that can be applied at the Plan-level will be considered. This could involve a modification to the Plan to reduce its impact or the specification of measures that would be made a condition of individual projects. Where the HRA identifies a potential Adverse Effect on Integrity, only when it is sufficiently certain that mitigation would make an effective contribution to avoiding or reducing harm, can mitigation measures be considered as enabling a determination of no Adverse Effect on the Integrity of a site to be concluded. It should be noted, however, that the Morgan Generation Assets was not identified as a preferred project required to be considered in the Appropriate Assessment by TCE for either of these sites. Therefore, no Adverse Effects on the Integrity of sites were identified for the Morgan Generation Assets in the Plan-Level HRA.

1.4.4.4 On the basis of these conclusions, TCE considered derogation and concluded that: a) there are no alternative solutions to deliver the Offshore Wind Leasing Round 4 objectives; b) there are clear imperative reasons of overriding public interest to proceed under the government's targets for offshore wind and net-zero; and c) the Offshore Wind Leasing Round 4 provides a robust framework for the delivery of compensatory measures. TCE therefore considered that the three derogation tests have been met and the Secretary of State has since agreed that TCE can proceed with the plan. As discussed in paragraph 1.4.4.3, it should be noted that the Morgan Offshore Wind Project was not identified as a preferred project required to be considered in the Appropriate Assessment by TCE for either of the sites outlined in paragraph 1.4.4.3 above. Therefore, no Adverse Effect on Integrity were identified for the Morgan Generation Assets in the Round 4 Plan-Level HRA.

1.4.4.5 The Plan-Level HRA notes that TCE expects developers to undertake project-specific environmental assessments - including a detailed project-level HRA - as part of their application for development consent. This document comprises Stage 2 of the HRA, which carries out the Appropriate Assessment of the Morgan Generation Assets with respect to its potential to adversely affect the integrity of a European site. This HRA Stage 2 ISAA has taken into account the information and approach taken by the Plan Level HRA as set out below in paragraph 1.4.5.1.

1.4.5 Guidance

1.4.5.1 This HRA Stage 2 ISAA has drawn upon a number of information sources, HRA principles, regulations and guidance documents, including:

- The Conservation of Habitats and Species Regulations 2017 and The Conservation of Offshore Marine Habitats and Species Regulations 2017 (the Offshore Habitats Regulations)

- EC (2002) Assessment of Plans and Projects Significantly Affecting Natura 2000 Sites. Methodological guidance on the provisions of Article 6(3) and (4) of the Habitats Directive 92/43/EEC. Office for Official Publications of the European Communities, Luxembourg
- EC (2006) Nature and Biodiversity Cases Ruling of the European Court of Justice
- EC (2007) Guidance document on Article 6(4) of the 'Habitats Directive' 92/43/EE. Clarification on the Concepts of: Alternative Solutions, Imperative Reasons of Overriding Public Interest, Compensatory Measures, Overall Coherence, Opinion of the Commission
- EC (2018) Managing Natura 2000 sites. The provisions of Article 6 of the 'Habitats' Directive 92/43/EEC'
- EC (2020) Guidance document on wind energy developments and EU nature legislation. European Commission Notice Brussels (2020) 7730 final
- EC (2021) Assessment of plans and projects in relation to Natura 2000 sites - Methodological guidance on Article 6(3) and (4) of the Habitats Directive 92/43/EEC. European Commission Notice Brussels (2021) 6913 final
- Defra (2021) Policy paper - Changes to the Habitats Regulations 2017, Published 1 January 2021
- Joint Defra, Welsh Government, Natural England and Natural Resources Wales guidance (2021) 'Habitats regulations assessments: protecting a European site'
- The Planning Inspectorate Advice Note Nine: Rochdale Envelope (The Planning Inspectorate, 2018)
- The Planning Inspectorate Advice Note Ten: Habitats Regulations Assessment relevant to nationally significant infrastructure projects (The Planning Inspectorate, 2022)
- The Planning Inspectorate Advice Note Seventeen: Cumulative effects assessment relevant to nationally significant infrastructure projects (The Planning Inspectorate, 2019)
- The Habitats Regulations Assessment Handbook (DTA Publications Limited, 2016)
- The Crown Estate Plan Level HRA (The Crown Estate, 2022)
- Natural England (2022). Offshore Wind Marine Environmental Assessments: Best Practice Advice for Evidence and Data Standards. Phase III: Expectations for data analysis and presentation at examination for offshore wind applications
- Feedback received from the Mona Offshore Wind Project and Morgan Generation Assets Evidence Plan Process to date (see section 1.5).

1.4.6 Case law relevant to the ISAA

Consideration of mitigation measures

1.4.6.1 In Case C-323/17 People Over Wind, Peter Sweetman v Coillte Teoranta [2018] Ecr I-244, the CJEU ruled that mitigation measures could not be taken into account at the screening stage. The approach taken in the HRA Stage 1 Screening Report for the

Morgan Generation Assets complied with this judgement and no mitigation measures were considered at the HRA Stage 1 Screening stage.

Adverse effects on Integrity

1.4.6.2 The ECs guidance on managing Natura 2000 sites (EC, 2018) states that the purpose of the Appropriate Assessment is to assess the implications of the plan or project against the conservation objectives of the European site, this may be from the plan/project alone or in-combination with other plans or projects. The conclusions should enable the relevant Competent Authority to conclude whether the plan or project will adversely affect the integrity of the site concerned. The focus of the Appropriate Assessment is therefore specifically on the designated features (species and/or the supporting habitats or resources which are connected to the designated features (where an impact exists) of the European site.

1.4.6.3 The best scientific knowledge should always be used when undertaking an Appropriate Assessment in order to enable the competent authorities to conclude with certainty that there will be no Adverse Effect on the Integrity of the site. The EC (2018) guidance notes that it is at the time of the decision authorising the implementation of the project that there must be no reasonable scientific doubt remaining as to the potential for an Adverse Effect on the Integrity of the site being assessed.

1.4.6.4 The judgment of the CJEU confirmed this in its ruling in Case C-258/11 Sweetman, Ireland, Attorney General, Minister for the Environment, Heritage and Local Government v An Bord Pleanála [2022] IEHC 2. The ruling stated that 'Article 6(3) of the Habitats Directive must be interpreted as meaning that a plan or project not directly connected with or required for the management of a site will adversely affect the integrity of that site if the plan or project is liable to prevent the lasting preservation of the constitutive characteristics of the site that are connected to the presence of a priority natural habitat whose conservation was the objective justifying the designation of the site in the list of SCIs. The precautionary principle should be applied for the purposes of that appraisal'. EC (2018) advises that this interpretation would also be relevant to non-priority habitat types and to habitats of the designated species.

1.4.6.5 EC (2018) defines the 'integrity of the site' as the coherent sum of the site's ecological structure, function and ecological processes, across its whole area, which enables it to sustain the habitats, complex of habitats and/or populations of species for which the site is designated. In Sweetman 1 it was determined that the ecological structure and function of a European site would be adversely affected with regards to the site's overall ecological functions and '*the lasting preservation of the constitutive characteristics of the site*.'

1.4.6.6 EC (2018) also states that if the Competent Authority considers that the relevant mitigation measures are sufficient to avert the adverse effects on site integrity identified in the Appropriate Assessment, they are then required to become an essential element of the final plan or project design or may be listed as a condition for project consent.

1.4.6.7 EC (2020) states it is the Competent Authority's responsibility to approve the plan or project, a decision made on the basis of the information provided by the applicant to inform the Appropriate Assessment. The decision can only be made after the Competent Authority is satisfied beyond reasonable scientific doubt that the plan or project will not have an Adverse Effect on the Integrity of the site.

1.4.6.8 EC (2020) also reaffirms that the authorisation criterion laid down in the second sentence of Article 6(3) of the Habitats Directive integrates the precautionary principle and makes it possible to effectively prevent the protected sites from suffering adverse

effects on their integrity as the result of the plans or projects in question. A less stringent authorisation criterion could not as effectively ensure the fulfilment of the objective of site protection intended under that provision. The onus is therefore on demonstrating the absence of adverse effects rather than their presence, reflecting the precautionary principle. The Appropriate Assessment must therefore be adequately detailed and justified to highlight the absence of adverse effects, using the best scientific knowledge available.

1.4.6.9 In accordance with the decision of the CJEU in Case C-127/02 Landelijke Vereniging tot Behoud van de Waddenzee and Nederlandse Vereniging tot Bescherming van Vogels v Staatssecretaris van Landbouw, Natuurbeheer en Visserij, the measure of significance is made against the conservation objectives for which the European sites were designated.

Consideration of *ex situ* effects

1.4.6.10 EC (2018) advises that Article 6(3) safeguards be applied to any development pressures, including those which are outside of the boundaries European sites, but which are likely to have significant effects on that European site.

1.4.6.11 The CJEU developed this point when it issued a ruling in Case 461/17 Brian Holohan, Richard Guilfoyle, Noric Guilfoyle, Liam Donegan v An Bord Pleanála [2017] IEHC 268. This ruling determined *inter alia* that Article 6(3) of Directive 92/43/EEC must be interpreted as meaning that an Appropriate Assessment must identify all of the habitat types and species for which a site is protected. It must also identify and assess both the effects of the proposed plan or project for the species present on that site, and for which that site has not been listed, and the implications for habitat types and species to be found outside the boundaries of that site, provided that the identified effects have the potential to affect the conservation objectives of the site.

1.4.6.12 On this basis, consideration has been given in this ISAA to implications for designated habitats and species, located both inside and outside of the identified European site boundaries considered in the HRA Stage 1 Screening Report (Document Reference Number E1.4). Consideration of the implications for the site has been made in view of the sites' conservation objectives where effects upon those habitats and/or species could potentially undermine the conservation objectives of the sites concerned.

1.5 Consultation

1.5.1 The Evidence Plan process

1.5.1.1 The Applicant is facilitating the Evidence Plan process for the Morgan Generation Assets. The purpose of the Evidence Plan process is to agree the information the Morgan Generation Assets needs to supply to the Secretary of State, as part of the application for consent for the Morgan Generation Assets. The Evidence Plan seeks to ensure compliance with the HRA and Environmental Impact Assessment (EIA) and helps ensure Applicants provide sufficient information as part of their DCO application.

1.5.1.2 An evidence plan steering group has been established for the Mona Offshore Wind Project and the Morgan Generation Assets. It was determined appropriate to have a joint evidence plan process across the Mona Offshore Wind Project and the Morgan Generation Assets so as to ensure common issues and cumulative/in-combination issues are appropriately addressed. The steering group is comprised of the Applicant, the Planning Inspectorate, Natural Resources Wales, Natural England, the Joint Nature Conservation Committee and the Marine Management Organisation as the key

regulatory bodies and SNCBs. The steering group has met at key milestones throughout the EIA process.

1.5.1.3 In addition, EWGs have been established to discuss topic specific issues with relevant statutory and non-statutory stakeholders. EWG meetings have been held and will continue to be held at key stages in the EIA process or when new information becomes available for each topic, to provide the opportunity for stakeholders to provide feedback and advice at an early stage. EWGs have been established for the following topics:

- Physical processes, benthic ecology and fish and shellfish ecology
- Marine mammals
- Offshore ornithology
- Onshore ecology and intertidal birds.

1.5.1.4 A summary of the key consultation undertaken to date for each receptor group is included in the HRA Stage 2 ISAA Part 2 – SAC assessments (Document Reference E1.2) and HRA Stage 2 ISAA Part 3 – SPA and Ramsar Sites assessments (Document Reference E1.3). Further information on technical engagement relevant to the Morgan Generation Assets is included in the Technical Engagement Plan (Document Reference E4.1).

1.6 References

Department for Environment, Food and Rural Affairs (DEFRA) (2021). Policy Paper - Changes to the Habitats Regulations 2017. Available online at: https://www.gov.uk/government/publications/changes-to-the-habitats-regulations-2017/changes-to-the-habitats-regulations-2017 Accessed October 2023.

DTA Publications Ltd (2016) The Habitats Regulations Assessment Handbook.

European Commission (EC) (2006) Nature and Biodiversity Cases Ruling of the European Court of Justice.

EC (2007) Guidance document on Article 6(4) of the 'Habitats Directive' 92/43/EE. Clarification on the Concepts of: Alternative Solutions, Imperative Reasons of Overriding Public Interest, Compensatory Measures, Overall Coherence, Opinion of the Commission.

EC (2018) Managing Natura 2000 sites. The provisions of Article 6 of the 'Habitats' Directive 92/43/EEC'.

EC (2020) Guidance document on wind energy developments and EU nature legislation. European Commission Notice Brussels (2020) 7730 final.

EC (2021) Assessment of plans and projects in relation to Natura 2000 sites - Methodological guidance on Article 6(3) and (4) of the Habitats Directive 92/43/EEC. European Commission Notice Brussels C(2021) 6913 final.

Joint Defra, Welsh Government, Natural England and Natural Resources Wales guidance (2021) Habitats regulations assessments: protecting a European site. Available online at: https://www.gov.wales/habitats-regulations-assessments-protecting-european-site-html Accessed November 2023.

Natural England (2022) Offshore Wind Marine Environmental Assessments: Best Practice Advice for Evidence and Data Standards. Phase III: Expectations for data analysis and presentation at examination for offshore wind applications. Available online at (restricted access): Offshore wind – best practice advice to facilitate sustainable development - Natural England (blog.gov.uk).

NRW and JNCC (2015) SAC Selection Assessment Document: West Wales Marine / Gorllewin Cymru Forol. January, 2016. Natural Resources Wales and Joint Nature Conservation Committee, UK.

TCE (2022) Report to Inform Appropriate Assessment Offshore Wind Leasing Round 4 Plan Level HRA 38255_NIRAS_REP_106_V1.1 Issued for Consultation.

The Planning Inspectorate (2019) Advice Note Nine: Rochdale Envelope. Available online at: https://infrastructure.planninginspectorate.gov.uk/legislation-and-advice/advice-notes/advice-note-nine-rochdale-envelope/ Accessed January 2024.

The Planning Inspectorate (2019) Advice Note Seventeen: Cumulative effects assessment relevant to nationally significant infrastructure projects. Available online at: https://infrastructure.planninginspectorate.gov.uk/legislation-and-advice/advice-notes/advice-note-17/ Accessed October 2023.

The Planning Inspectorate (2022) Advice Note ten: Habitats Regulations Assessment relevant to nationally significant infrastructure projects. Available online at: https://infrastructure.planninginspectorate.gov.uk/legislation-and-advice/advice-notes/advice-note-ten/ Accessed October 2023.