

MONA OFFSHORE WIND PROJECT

Mona and Royal Society for the Protection of Birds Cymru SoCG

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Image of an offshore wind farm

MONA OFFSHORE WIND PROJECT

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Glossary

Term	Meaning
Applicant	Mona Offshore Wind Limited.
Development Consent Order (DCO)	An order made under the Planning Act 2008 granting development consent for one or more Nationally Significant Infrastructure Project (NSIP).
Marine licence	The Marine and Coastal Access Act 2009 requires a marine licence to be obtained for licensable marine activities. Section 149A of the Planning Act 2008 allows an applicant for a DCO to apply for a 'deemed' marine licence as part of the DCO process. In addition, licensable activities within 12nm of the Welsh coast require a separate marine licence from Natural Resource Wales (NRW).
Mona Offshore Wind Project	The Mona Offshore Wind Project is comprised of both the generation assets, offshore and onshore transmission assets, and associated activities.
The Planning Inspectorate	The agency responsible for operating the planning process for Nationally Significant Infrastructure Projects.

Acronyms

Acronym	Description
AEol	Adverse effect on integrity
CEA	Cumulative effects assessment
CRM	Collision risk modelling
DAS	Digital aerial surveys
DCO	Development Consent Order
EIA	Environmental Impact Assessment
EWG	Expert working group
HRA	Habitat Regulation Assessment
ISAA	Information to Support Appropriate Assessment
LSE	Likely significant effects
MHWS	Mean High Water Springs
MLWS	Mean Low Water Springs
OSP	Offshore Substation Platform
PEIR	Preliminary environmental information report
PVA	Population viability analysis
RSPB	Royal Society for the Protection of Birds
SoCG	Statement of Common Ground
SPA	Special Protection Area

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Units

Unit	Description
kV	Kilovolts

1 Initial Statement of Common Ground between Mona Offshore Wind Project and the Royal Society for the Protection of Birds Cymru

1.1 Introduction

1.1.1 Overview

1.1.1.1 This Initial Statement of Common Ground (SoCG) has been prepared between Mona Offshore Wind Limited (hereafter referred to as ‘the Applicant’) and the Royal Society for the Protection of Birds Cymru (hereafter referred to as ‘RSPB Cymru’), together the parties. The SoCG sets out the areas of agreement and disagreement between the parties in relation to the proposed Development Consent Order (DCO) application for the Mona Offshore Wind Project.

1.1.1.2 The need for a SoCG between the Applicant and RSPB Cymru is set out in section 1 of Appendix F of the Rule 6 letter issued by the Planning Inspectorate on 07 June 2024.

1.1.1.3 This document is intended to provide the Examining Authority with an overview of the level of common ground between the parties. It will also be used to facilitate further discussion between the parties and will be updated during the Mona Offshore Wind Project Examination.

1.1.1.4 This initial SoCG covers key concerns raised in RSPB Cymru’s relevant representation (RR-071), and as such focusses on offshore ornithology matters only, and in particular, the impacts of the Mona Offshore Wind Project on species such as Manx shearwater and great black-backed gull. A number of key concerns from RSPB Cymru are related to wider industry limitations on baseline survey methods and assessment of impacts on Manx shearwater and are therefore wider than a project specific issue.

1.1.1.5 Matters relating to onshore and intertidal ornithology were not raised in RSPB Cymru’s relevant representation (RR-071) and is therefore not considered to be a key area of concern for RSPB Cymru. It was therefore agreed between the parties that onshore and intertidal ornithology would not be covered in this initial SoCG.

1.1.2 Overview of Mona Offshore Wind Project

1.1.2.1 Mona Offshore Wind Project is a proposed offshore wind farm located in the east Irish Sea. The Mona Offshore Wind Project will include both offshore and onshore infrastructure and consist of:

- **Mona Array Area:** This is where the wind turbines, Offshore Substation Platforms (OSPs), foundations (for both wind turbines and OSPs), inter-array cables, interconnector cables and offshore export cables will be located
- **Mona Offshore Cable Corridor and Access Areas:** The corridor located between the Mona Array Area and the landfall up to Mean High Water Springs (MHWS), in which the offshore export cables will be located and in which the intertidal access areas are located
- **Intertidal access areas:** The area from MHWS to Mean Low Water Springs (MLWS) which will be used for access to the beach and construction related activities

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- Landfall: This is where the offshore export cables make contact with land and the transitional area where the offshore cabling connects to the onshore cabling
- Mona Onshore Development Area: The area in which the landfall, Mona Onshore Cable Corridor, Mona Onshore Substation, mitigation areas, temporary construction facilities (such as access roads and construction compounds), operational access to the Mona Onshore Substation and the connection to National Grid infrastructure will be located
- Mona Onshore Substation: This is where the new substation will be located, containing the components for transforming the power supplied from the offshore wind farm up to 400 kV
- Mona 400 kV Grid Connection Cable Corridor: The corridor from the Mona Onshore Substation to the National Grid substation.

1.1.3 Approach to SoCG

1.1.3.1 This initial SoCG has been developed during the pre-examination and will be progressed during the examination phase of the Mona Offshore Wind Project. In accordance with discussions between the parties, the SoCG is focused on those issues raised by RSPB Cymru within its response to the Scoping Report, Section 42 consultation and as raised through the Evidence Plan Process that has underpinned the pre-application consultation between the parties. This initial SoCG also includes those issues raised by RSPB Cymru during the post-application phase (i.e. relevant representations and pre-examination meetings).

1.1.3.2 The structure of this Initial SoCG is as follows:

- Section 1.1: Introduction
- Section 1.2: Summary of SoCG
- Section 1.3: Summary of consultation
- Section 1.4.: Agreements Log

1.2 Summary of SoCG

1.2.1.1 This SoCG has outlined the consultation that has taken place between the parties during the pre-application and post-application phase of the Mona Offshore Wind Project. The agreement logs present the position reached on 07 August 2024 (Deadline 1).

1.2.2 Summary of Those Matters Agreed, Ongoing Points of Discussion and Not Agreed

1.2.2.1 Table 1.6 provides a summary of those matters agreed, an ongoing point of discussion or not agreed between the parties.

Table 1.1: Summary of areas agreed, ongoing points of discussion and not agreed between the parties.

Topic	Agreed
Offshore ornithology	Ongoing point of discussion

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1.3 Summary of consultation

1.3.1.1 Table 1.1 below provides a summary of the consultation undertaken by the Applicant with RSPB Cymru, relevant to offshore ornithology and onshore and intertidal ornithology during the pre-application phases of the Mona Offshore Wind Project. Table 1.2 below provides a summary of the consultation undertaken by the Applicant with RSPB Cymru, relevant to offshore ornithology and onshore and intertidal ornithology during the post-application phases of the Mona Offshore Wind Project.

Table 1.2: Summary of pre-application consultation with RSPB Cymru.

Date	Form of consultation	Statutory or non-statutory engagement	Summary of consultation
Scoping			
15 June 2022	Scoping Opinion	Statutory	<ul style="list-style-type: none"> Issue of Scoping Opinion (APP-194)
Statutory (Section 42) consultation			
04 June 2023	Statutory consultation	Statutory	<ul style="list-style-type: none"> Statutory consultation responses from RSPB Cymru are presented in Consultation Report Appendices – Part 3 (D.25-F) (APP-040).
Evidence Plan offshore ornithology Expert Working Group (EWG)			
18 February 2022	Meeting	Non-statutory	<ul style="list-style-type: none"> Introduce and gain feedback on Evidence Plan Discuss stakeholder comments on the survey scopes to date (i.e. prior to Evidence Plan) and any further data required Update on the progress of surveys and data analysis.
27 May 2022	Email	Non-statutory	<ul style="list-style-type: none"> Provision of technical notes outlining the Applicants approach to the offshore ornithology baseline characterisation, displacement and Collision Risk Modelling (CRM) technical reports.
13 July 2022	Meeting	Non-statutory	<ul style="list-style-type: none"> Agree the approach to baseline characterisation, cumulative study area to agree the approach to Environmental Impact Assessment (EIA), including impact scoping Presentation of the interim baseline characterisation and discuss and agree the approach to data analyses, including relevant modelling techniques and parameters.
23 February 2023	Meeting	Non-statutory	<ul style="list-style-type: none"> To agree key receptor species and to present the interim assessment of impacts Relevant regional populations and protected sites/qualifying interests for assessment and approach to Habitats Regulation Assessment (HRA) Stage 1 screening Discuss and agree scope of cumulative impact assessment and transboundary considerations To discuss and agree population assessment approaches and thresholds for Likely Significant Effects (LSE) and integrity

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Date	Form of consultation	Statutory or non-statutory engagement	Summary of consultation
05 May 2023	Email	Non-statutory	<ul style="list-style-type: none"> Provision of the updated methodology for offshore ornithology HRA Stage 1 screening and the Information to Support Appropriate Assessment (ISAA).
10 July 2023	Email	Non-statutory	<ul style="list-style-type: none"> Provision of the technical note presenting the power analysis undertaken at the request of the Expert Working Group (EWG).
19 October 2023	Meeting	Non-statutory	<ul style="list-style-type: none"> Presentation of updated baseline characterisation Impact assessment for the Environmental Statement.
23 November 2023	Email	Non-statutory	<ul style="list-style-type: none"> Provision of the technical note outlining the Applicants position regarding using species specific avoidance rates from Ozsanlav-Harris et al. (2023). Provision of the technical note outlining the final updated methodology for offshore ornithology HRA Stage 1 screening and the ISAA
29 November 2023	Email	Non-statutory	<ul style="list-style-type: none"> Provision of the technical note outlining the Applicant's position regarding calculating the regional breeding population.
08 December 2023	Meeting	Non-statutory	<ul style="list-style-type: none"> Presentation of final impact assessment Comments on draft Environmental Statement Final mitigation and monitoring requirements.
26 January 2024	Email	Non-statutory	<ul style="list-style-type: none"> Joint response from the Mona, Morgan Generation and Morecambe Generation Projects to the 'Proposed methodology for 'gap-filling' the Irish Sea R4 cumulative & in-combination assessments' advice from Natural England.

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

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

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

Table 1.3: Summary of post-application consultation with RSPB Cymru.

Date	Form of consultation	Statutory or non-statutory engagement	Summary of consultation
15 May 2024	Meeting	Non-statutory	<ul style="list-style-type: none"> Discussed content of the DCO application Discussed timeframe of the Pre-examination and Examination milestones Discussed next steps including points of contact during Pre-examination and Examination, Relevant Representations and SoCG
11 July 2024	Meeting	Non-statutory	<ul style="list-style-type: none"> Review of this initial statement of common ground
19 August 2024	Meeting	Non-statutory	<ul style="list-style-type: none"> Second review of initial statement of common ground prior to submission at Deadline 2

1.4 Agreement log

1.4.1.1 This section of the SoCG sets out the level of agreement between the parties. For each matter the status is identified as being either agreed, not agreed or an ongoing point of discussion, according to the criteria set out in Table 1.3 below.

Table 1.4: Position definitions and colour coding.

Position and colour coding	Definition of position
Agreed	The matter is considered to be agreed between the parties.
Ongoing point of discussion	The matter is neither agreed or not agreed, and is a matter where further discussion is required between the parties. For example, where additional clarification is being sought from either party, or where relevant information is being prepared / reviewed.
Not agreed, but not material	The matter is not considered to be agreed between the parties, but is not deemed material. For example, the matter is not agreed however, the outcome of the approach taken by either party does not result in a material impact on the assessment or assessment conclusions in either EIA or HRA terms.
Not agreed	The matter is not considered to be agreed between the parties. The outcome of the approach taken by either party is considered to result in a materially different outcome to the assessment conclusions.

1.4.1.2 Table 1.4 sets out the level of agreement between the parties for each relevant component of the application (as identified in section 1.1.2) in relation to offshore ornithology (EIA and HRA).

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1.4.2 Offshore ornithology (EIA and HRA)

Table 1.5: Agreement Log between the parties on offshore ornithology.

Reference Number	Discussion point	Applicant's Position	RSPB Cymru's Position	Status
EIA				
RPSB.OO.1	Consultation	The Applicant has undertaken adequate consultation with RSPB Cymru on potential impacts on offshore ornithology and note that further consultation with RSPB Cymru throughout the Examination will be through written communication only.	RSPB Cymru note that they are grateful for the constructive pre-application discussions that have taken place with Mona Offshore Wind Farm Limited in respect of this proposal, particularly through the Evidence Plan process. RSPB Cymru will continue, as far as practicable, to seek to engage with the Applicant throughout the Examination period. However due to the number of offshore wind farm project applications coming forward during 2024 RSPB Cymru will face significant demands on our limited capacity. As a consequence, RSPB Cymru will not be able to engage with any hearings associated with this application and will engage through written communications only and limited to when capacity allows.	Agreed
RSPB.OO.2	Consultation	The EIA has had due regard to matters raised by RSPB Cymru through statutory and non-statutory consultation on potential impacts on offshore ornithology.	RSPB Cymru noted that while methodological concerns remain, progress towards resolving a number of issues was made during pre-application discussions. RSPB Cymru continue to have significant concerns relating to the project's in-combination and cumulative collision risk and displacement impacts including their assessment.	Ongoing point of discussion
RSPB.OO.3	Surveys	The broad approach to site specific digital aerial surveys (DAS) is appropriate.	RSPB Cymru requested more detail than was presented in EWG meeting 1 to be able to provide agreement on the DAS approach. RSPB Cymru could not agree the survey methodology without further detail. It was agreed that they would review further detail provided at the scoping stage (EWG 18-02-2022 in D.9 of APP-042).	Ongoing point of discussion

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Reference Number	Discussion point	Applicant's Position	RSPB Cymru's Position	Status
RSPB.OO.4	Surveys	The broad approach to site specific digital aerial surveys (DAS) is appropriate.	In their Relevant Representation (RR-017), RSPB Cymru expressed outstanding concerns that the Manx shearwater baseline characterisation using digital aerial surveys (DAS) does not adequately capture the activity of the species. Their position was that the diel variation in Manx shearwater activity means that the somewhat limited amount of time DAS were carried out is unlikely to properly characterise the activity of Manx shearwater at the Application site. RSPB Cymru also expressed concerns regarding whether the size and flight characteristics of the species make them harder to detect in the surveys. As a result, RSPB Cymru do not have confidence in the baseline densities of Manx Shearwater presented in the assessment. RSPB Cymru will review the Applicant's response to their relevant representation on this matter (PDA-008, paragraph RR-071.12).	Ongoing point of discussion
RSPB.OO.5	Scoping	The assessment has identified and assessed all likely significant affects relevant to ornithology as identified within the Scoping Report and Scoping Opinion. Potential impacts to offshore ornithology at the ecosystem level are assessed in the inter-related effects assessment (Paragraphs 11.6.3.10 to 12 and Table 11.10 of Volume 2, Chapter 11: Inter-related effects (offshore) (APP-063)).	RSPB Cymru consider that the Assessment has not fully considered indirect ecosystem impacts (e.g. displacement from foraging areas, additional energy expenditure, potential impacts on forage fish and wider ecosystem impacts such as changes in stratification). RSPB Cymru would welcome consideration of the potential wider ecosystem impacts.	Ongoing point of discussion
RSPB.OO.6	Baseline environment	The baseline characterisation for offshore ornithology in respect of Manx Shearwater is appropriate.	RSPB Cymru's concerns with the baseline characterisation for Manx Shearwater are set out under RSPB.OO.4 above.	Ongoing point of discussion
RSPB.OO.7	Study area	The EIA study area is appropriate for the receptors and impacts assessed.	RSPB Cymru is in agreement that the EIA study area is appropriate.	Agreed

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Reference Number	Discussion point	Applicant's Position	RSPB Cymru's Position	Status
RSPB.OO.8	Project design envelope	The EIA chapter has identified, described and assessed the maximum design scenario for the EIA.	RSPB Cymru is in agreement that the maximum design scenario has been adequately identified and described.	Agreed
RSPB.OO.9	Assessment methodology	The sensitivity of offshore ornithology receptors has been correctly identified and sufficiently described within the EIA.	RSPB Cymru has expressed concern regarding the potentially severe population scale impacts on seabird populations from the outbreak of the H5N1 strain of Highly Pathogenic Avian Influenza (HPAI). This scale of the impact of HPAI means that seabird populations will be much less robust to additional mortality arising from offshore wind farm developments. It also means that there may need to be a reassessment of whether SPA populations are in Favourable Conservation Status. RSPB Cymru noted that they do not agree with Natural England's guidance on HPAI in relation to baseline characterisation of offshore renewable projects (Natural England, 2022). RSPB Cymru will review the Applicant's response to their relevant representation on this matter (PDA-008, paragraph RR-071.6).	Ongoing point of discussion
RSPB.OO.10	Assessment methodology	The approach to displacement assessment methodology is appropriate.	RSPB Cymru agree that the displacement assessment methodology is appropriate.	Agreed
RSPB.OO.11	Assessment methodology	The approach to collision risk assessment methodology for Manx Shearwater is appropriate.	RSPB Cymru stated that the collision risk methodology for Manx shearwater does not adequately consider behaviour change because of illuminations, and therefore disagree with Applicant's conclusion that there would be no adverse impact to Manx Shearwater.	Not agreed
RSPB.OO.12	Assessment methodology	The approach to apportioning assessment methodology is appropriate.	RSPB Cymru is still considering its position with respect to this aspect of the Applicant's assessment methodology.	Ongoing point of discussion
RSPB.OO.13	Assessment methodology	The approach to population viability analysis (PVA) is suitable, and PVAs have been undertaken where appropriate.	RSPB Cymru is still considering its position with respect to this aspect of the Applicant's assessment methodology.	Ongoing point of discussion

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Reference Number	Discussion point	Applicant's Position	RSPB Cymru's Position	Status
RSPB.OO.14	Assessment methodology	The approach to estimating regional breeding populations is appropriate.	RSPB Cymru is still considering its position with respect to this aspect of the Applicant's assessment methodology.	Ongoing point of discussion
RSPB.OO.15	Assessment methodology	The list of projects screened into the CEA in the EIA are appropriate.	RSPB Cymru is still considering its position with respect to this aspect of the Applicant's assessment methodology.	Ongoing point of discussion
RSPB.OO.16	Assessment of the effects from the project alone	There will be no significant effects on offshore ornithology receptors in EIA terms for the project alone.	As a result of methodological concerns outlined in this table above, RSPB Cymru do not agree with the Applicant's conclusions on significance of effects.	Ongoing point of discussion
RSPB.OO.17	Assessment of the effects from the project cumulatively with other projects	<p>There will be no significant effects on ornithology receptors in EIA terms for the project cumulatively with other plans and projects.</p> <p>The Applicant is currently undertaking a 'gap-filling' exercise in accordance with SNCBs advice (which is presented in Section D.6.13 of Appendix D of Technical Engagement Plan APP-042) to generate indicative estimates for currently unquantified impacts from historical projects. The Applicant is engaging with the SNCBs on the results of this exercise and anticipate this information being submitted for examination at Deadline 3.</p>	<p>RSPB Cymru expressed significant concerns relating to the project's in-combination and cumulative collision risk and displacement impacts including their assessment.</p> <p>RSPB Cymru welcomes the Applicant's engagement with the SNCBs on this matter.</p> <p>RSPB Cymru will review the Applicant's information when it becomes available to the examination.</p>	Ongoing point of discussion

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Reference Number	Discussion point	Applicant's Position	RSPB Cymru's Position	Status
RSPB.OO.18	Assessment of the effects from the project cumulatively with other projects	The approach to cumulative assessment for projects where impact quantification is unavailable is appropriate.	<p>With regards to the methodology for assessment of cumulative/in-combination impacts, RSPB Cymru recognise the difficulties with carrying out a full in combination assessment for a number of species SPA combinations because of the difficulties in obtaining historical data and the limitations in how it was collected and analyses. They highlighted that Natural England have produced what they consider to be a practical and pragmatic solution. RSPB Cymru stated that while it is acceptable for the Applicant to present alternative methodologies, it would be preferable for the outputs to be presented alongside those obtained following the recommendations of the Statutory Agencies.</p> <p>RSPB Cymru will review the Applicant's additional information referred to in OO.17 when it becomes available to the examination.</p> <p>RSPB Cymru highlighted particular concerns regarding in-combination impacts to Great Black-backed Gull at the Isles of Scilly SPA in light of recently recorded population decline.</p>	Ongoing point of discussion

HRA

RSPB.OO.19	Screening	The screening of impacts for the HRA for offshore ornithology is appropriate.	RSPB Cymru is still considering its position with respect to this aspect of the Applicant's approach to HRA.	Ongoing point of discussion
RSPB.OO.20	Screening	The approach to identification of sites and features in the HRA Stage 1 Screening is appropriate.	RSPB Cymru is still considering its position with respect to this aspect of the Applicant's approach to HRA.	Ongoing point of discussion
RSPB.OO.21	Study area	The HRA study area is appropriate for the receptors, sites and impacts assessed.	RSPB Cymru is still considering its position with respect to this aspect of the Applicant's approach to HRA.	Ongoing point of discussion
RSPB.OO.22	Assessment methodology	All European sites with offshore ornithology features that have the potential for LSE have been identified within the HRA Stage 1 screening and considered in the Stage 2 ISAA.	RSPB Cymru is still considering its position with respect to this aspect of the Applicant's approach to HRA.	Ongoing point of discussion

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Reference Number	Discussion point	Applicant's Position	RSPB Cymru's Position	Status
RSPB.OO.23	Assessment methodology	The list of projects screened into the in-combination assessment in the HRA are appropriate.	RSPB Cymru is still considering its position with respect to this aspect of the Applicant's approach to HRA.	Ongoing point of discussion
RSPB.OO.24	Screening	The approach to HRA Stage 1 Screening using outputs for CRM, displacement assessment and associated apportioning is appropriate.	RSPB Cymru have significant concerns regarding the findings of the impact assessment in relation to Manx Shearwater as a result of the methodological concerns (see RSPB. RSPB.OO.11 above).	Not agreed
RSPB.OO.25	Outcomes of the Information to Support Appropriate Assessment (ISAA)	There will be no AEoI for SPAs designated for offshore ornithology features for any impacts for the project alone.	<p>See RSPB.OO.24 above. RSPB Cymru's position is that Adverse Effects on Integrity (AEoI) cannot be ruled out beyond reasonable scientific doubt for collision impacts and distributional change arising through the project alone and in combination with other projects for Manx shearwater at the following Special Protection Areas:</p> <ul style="list-style-type: none"> • Copeland Islands SPA • Irish Sea Front SPA • Rum SPA • St Kilda SPA • Glannau Aberdaron ac Ynys Enlli/Aberdaron Coast and Bardsey Island SPA <p>Skomer, Skokholm and the Seas off Pembrokeshire/Sgomer, Sgogwm a Moroedd Penfro SPA.</p>	Not agreed

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Reference Number	Discussion point	Applicant's Position	RSPB Cymru's Position	Status
RSPB.OO.26	Outcomes of the ISAA	There will be no AEol for SPAs designated for offshore ornithology features for any impacts for the project in-combination with other projects and plans.	<p>See RSPB.OO.24 and RSPB.OO.18 above.</p> <p>RSPB Cymru also expressed significant concerns relating to the project's in-combination and cumulative collision risk and displacement impacts including their assessment.</p> <p>With regards to the methodology for assessment of cumulative/in-combination impacts, RSPB Cymru recognise the difficulties with carrying out a full in combination assessment for a number of species SPA combinations because of the difficulties in obtaining historical data and the limitations in how it was collected and analyses. They highlighted that Natural England have produced what they consider to be a practical and pragmatic solution. RPSB Cymru stated that while it is acceptable for the Applicant to present alternative methodologies, it would be preferable for the outputs to be presented alongside those obtained following the recommendations of the Statutory Agencies.</p> <p>RSPB Cymru will review the Applicant's additional information referred to in OO.17 when it becomes available to the examination.</p> <p>RSPB Cymru highlighted particular concerns regarding in-combination impacts to Great Black-backed Gull at the Isles of Scilly SPA in light of recently recorded population decline.</p>	Ongoing point of discussion
Draft DCO				
RSPB.OO.27	Monitoring requirements / conditions	The mitigation and monitoring outlined in Volume 2, Chapter 5: Offshore ornithology (APP-057) and the Mitigation and Monitoring schedule (APP-196) and secured through the dDCO are appropriate and will ensure significant effects are avoided.	RSPB Cymru is still considering its position with respect to this.	Ongoing point of discussion

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Reference Number	Discussion point	Applicant's Position	RSPB Cymru's Position	Status
RSPB.OO.28	Other requirements / conditions	No additional conditions are required as a result of the outcomes of the offshore ornithology assessment.	RSPB Cymru is still considering its position with respect to this.	Ongoing point of discussion