Planning Inspectorate (CC Marine Directorate) -

Thank you for consulting NatureScot on this application to the Planning Inspectorate for permission to develop the Mona Offshore Wind Farm.

We have considered the predicted impacts of the proposed development on Scottish designated sites and protected species, with particular focus on European sites located in Scotland.

We have attempted to analyse the information in the ES and HRA, and have encountered many errors, disparities between text and tables, non-adherence to relevant guidance, and a general lack of clarity in the assessment. We have discussed this with other Statutory Nature Conservation Bodies (SNCBs) and they report the same problems with the quality of this application.

We do not have capacity to offer a detailed critique of the application in its current state. It seems likely that many aspects of the assessment will require revision, and possible re-submission.

We request that impacts on European sites in Scotland are assessed following the relevant Scottish guidance. We highlight our series of Guidance Notes on ornithological impact assessment, which can be found on our website: https://www.nature.scot/professional-advice/planning-and-development/planning-and-development-advice/renewable-energy/marine-renewables/advice-marine-renewables-development

We specifically highlight:
- Guidance note 7 - assessing collision risk to marine birds
- Guidance note 8 - assessing the distributional responses, displacement and barrier effects of marine birds
- Guidance note 11 - Recommendations for Seabird Population Viability Analysis (PVA)

The assessment in its current state does not follow this guidance, most notably it uses different thresholds for triggering PVA of relevant qualifying species from Scottish Special Protection Areas (SPAs).

We hope these comments are useful.

--
Malcolm Fraser ████████ | **Marine Sustainability Manager**