

**Application by Mona Offshore Wind Limited for an
Order Granting Development Consent for the Mona
Offshore Wind Farm (Ref. EN01037)**

Submission for Examination

Deadline 3

30 September 2024

**Joint Nature Conservation Committee
(JNCC):**

**JNCC's response to the
Applicant's Response to the
Examining Authority's Rule 17
Letter**

JNCC's response to the Applicant's Response to the Examining Authority's Rule 17 Letter ([REP2-077](#)) uses the paragraph numbers in the Applicant's document.

1.1.1.14

For clarity, whilst we agree that apportioned impacts within the Habitat Regulations Assessment (HRA) using a range-based approach to displacement needs to be presented, it also needs to be used in subsequent stages of the assessment, and used within both the Environmental Impact Assessment (EIA) and HRA.

The range-based displacement approach needs to be used:

- To determine Likely Significant Effect (LSE) and whether features are screened into the Appropriate Assessment (AA)
- To determine whether cumulative and/or in-combination assessments are required
- In the cumulative and in-combination assessments
- To compare to baseline mortality to determine whether a Population Viability Analysis (PVA) is required

We are of the view that the mean predicted mortalities from the stochastic Collision Risk Model can be used:

- To determine LSE and whether features are screened into the AA
- To determine whether cumulative and/or in-combination assessments are required
- In the cumulative and in-combination assessments
- To compare to baseline mortality to determine whether a PVA is required

However, we expect that the full range of predicted collision mortalities is presented within the EIA and the HRA (apportioned to Special Protected Areas (SPAs) i.e. that the upper and lower 95% confidence intervals are presented alongside the mean. This information would be particularly important in determining any compensation requirement, should Adverse Effect on Site Integrity (AEoSI) not be ruled out and a Derogation case required.

JNCC provided the above advice to the Applicant on 10/09/2024 following a Mona Offshore Wind Project & JNCC Monthly Meeting on 04/09/2024.

1.1.1.15

Although the approach taken by the Applicant (use of a single value based approach) may have been accepted by the Secretary of State for other recent offshore wind farm

Development Consent Order (DCO) applications, relevant Statutory Nature Conservation Body (SNCB) advice has consistently been to not use a single value based approach in relation to the displacement assessment. For example, this has been advised by NRW(A) for Project Erebus (NRW Advisory Response to Further Information), and by Natural England for Rampion 2 ([REP5-137](#)) and Hornsea Four ([REP2-085](#)). The full range of displacement impacts should be both presented and used within the assessments, as agreed during pre-application consultation (as stated in the Morgan Mona Displacement technical paper supplied to JNCC on 27/05/2022, and taking into account our written comments on the displacement technical paper supplied to the Applicant on 24/06/2022 and comments during and following Expert Working Group 02 meeting on 13/07/2022) as outlined in the agreement log, and as is stated in the [Joint SNCB Interim Displacement Advice Note \(2022\)](#) (see Appendix A and Appendix B at the end of this document for the main joint SNCB displacement advice and red-throated diver joint SNCB displacement advice, respectively).

1.1.1.20

We have engaged with the Applicant on the results of the gap-filling exercise for the Mona Offshore Wind Project, and provided the following response to the Applicant on 6th September 2024 (see Appendix C at the end of this document).

“JNCC, NE, & NRW (A) feedback

We are, on the whole, content with the general approach to gap-filling historical projects for cumulative and in-combination assessments and welcome the progress made to date.

We note that the results of the gap-filling exercise will be updated following the Mona project examination Deadline 2 and the meeting with SNCBs on 29 August 2024 to reflect the updated application material and SNCB feedback where appropriate, with the intention of submitting a revised version of this technical note into the examination at Mona Deadline 3. We have also provided feedback within Relevant Representations and Written Representations on providing the impact assessment using SNCB-preferred parameters, and this was echoed by the Mona Rule 17 Letter from the Examining Authority. We therefore query whether the submission of a revised version of the gap-filling note at Mona Deadline 3 will also include results taking account of SNCB-advised parameterisation? For example (but not limited to) using the range of SNCB-advised displacement and mortality rates and assigning of age classes based on DAS data and not stable age structures. Any changes to the assessment should be taken through to the next stage of the assessment, compared to baseline mortality, and if needed, taken through to Population Viability Analyses (the need for which should be considered based on SNCB advised parameters as well as the Applicant's preferred parameters). To reiterate our previous advice, the SNCBs are unlikely to be able to change our position on the implication for UK Network Marine Protected Areas (MPAs) either alone or in-combination until we have reviewed final revised assessments with

errors corrected, and the results of assessments conducted with SNCB advised approaches and parameters as well as the Applicant's preferred approaches and parameters.

We have the following recommendations and requests for the gap-filling exercise:

- The need for a cumulative assessment of Atlantic puffin is revisited in light of Relevant Representations and Written Representations comments regarding errors in Mean Seasonal Peak calculations, and the knock-on effect on the number of annual mortalities.*
- Justification is provided regarding the use of a deterministic Collision Risk Model (CRM), as opposed to a stochastic CRM, within the revised gap-filling note to be submitted at Deadline 3 of the Mona examination.*
- All information needed to run the CRMs are provided for clarity and reproducibility, (e.g. wind farm width, wind farm latitude, tidal offset, air gap, wind availability, downtime).*
- It has been assumed that the percentage of birds flying at Mona, Morgan, and Morecambe offshore wind farms will be the same as the percentage of birds flying at the gap-filled wind farms, which are generally located closer to the coast than the Round 4 projects. In reality this may not be the case due to differences in behaviour*
- close to the coast and further offshore. We recommend that other wind farms with data available e.g. Awel Y Mor and Walney Extension that are closer inshore than the Round 4 projects are checked to compare the proportions of birds in flight of birds at these with the Round 4 data. If proportions of birds in flight are significantly different to those at Mona, Morgan, and Morecambe, we recommend using the values from wind farms closer to shore.*
- s are checked to compare the proportions of birds in flight of birds at these with the Round 4 data. If proportions of birds in flight are significantly different to those at Mona, Morgan, and Morecambe, we recommend using the values from wind farms closer to shore.*
- Annual proportions of birds in flight have been used, but there may be differences in behaviour across the year. Given that the CRM uses monthly densities and produces monthly collision estimates, we recommend that a monthly proportion of birds flying correction factor is used, or if not possible then seasonal values are used.*
- flying correction factor is used, or if not possible then seasonal values are used.*
- The predicted collision impacts from Burbo Bank Offshore Wind Farm based on as-built windfarm parameters are higher compared to collision impacts based on consented windfarm parameters (Appendix A.2). This appears to be due to the*

smaller air gap when built compared to that consented (as indicated by Table 1-8), but we would welcome clarification.

- *We note that the Marine Licence application for Llyr Offshore Wind Farm has been submitted to NRW Licensing and is available on the public register.*

We look forward to continuing discussions on the gap-filling exercise and commenting on the resultant in-combination and cumulative assessments in due course.”

Appendix A



joint-sncb-interim-
displacement-advice

Appendix B



interim-sncb-advice
-rtd-displacement.p

Appendix C



2024-09-06 JNCC
NRW(A) and NE join