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

Submission for Examination

Deadline 4

4 November 2024

Joint Nature Conservation Committee (JNCC):

JNCC comments on Applicant's response to Examining Authority's Written Questions Q1.17.16

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JNCC comments on Applicant's response to Examining Authority's Written Questions Q1.17.16 (REP3-062).

Great black-backed gull

The Applicant's indicative cumulative collision totals for great black-backed gull of 163 birds including gap filled projects exceeds 1% of baseline mortality of the south-west and Channel BDMPS scale population (Furness 2015).The indicative figure using the SNCB advised species-group avoidance rate and including all gap filled projects, using consented parameters where available and as-built where consented information is not available, equates to 9.66% % of baseline mortality of the BDMPS population (Offshore Ornithology Cumulative Effects Assessment and In-combination Gap-filling Historical Projects Technical Note, Appendix D, Table D.1. REP3-044). This is above 1% baseline mortality and therefore requires further assessment.

We welcome that the Applicant has presented in Appendix D of REP3-044 an updated great black-backed gull EIA scale cumulative PVA using a starting population of 17,742 – the largest great black-backed gull BDMPS population as advised by NE/NRW in the interim advice note provided to the Applicant by NE in March 2024. Using the PVA model undertaken by the Applicant in Appendix D (Table D.2) of REP3-044, the unimpacted population after 35 years will be 10,801,276, with the impacted population using the SNBC advised species-group avoidance rate (99.39%) would be 7,533,689.

The Applicant recognises (and JNCC agrees) that the predicted population sizes are unrealistic due to the lack of density dependence within the model, and instead highlight the need to consider the counterfactual of growth rate is a more realistic metric to review the impact (paragraph D.1.1.1.4). If the indicative additional mortality from the offshore wind farms (OWF)is 163 great black-backed gull per annum, then:

- Median counterfactual of growth rate is 0.990
- i.e. The population growth rate would be reduced by approximately 1%

The original cumulative effects assessment for great black-backed gull population with the reference population of 44,753 individuals presented in Environmental Statement - Volume 2, Chapter 5: Offshore ornithology (REP2-016), concluded a minor adverse effect on the great black-backed gull population (south-west and Channel population scale, the relevant BDMPS considered for the Mona cumulative assessment). The updated assessment using a reference population of 44,753 individuals with the addition of the gap filled historical projects did not result in the Applicant changing this conclusion (Appendix D of REP3-044 paragraph 1.4.3.6). Although it is not stated in Appendix D, we assume that the Applicant

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has not changed its position on the significance of the impact resulting from the assessment using the SNCB advised reference population of 17,742.

However, as noted in Examining Authority's Written Questions Q1.17.16 (PD-013)**,** great black-backed gull moved to the Red list in UK BoCC 5a owing to a severe breeding population decline of 56% since Operation Seafarer (1969–70). It was Green-listed in the first two BoCC assessments and Amber-listed in BoCC3 and BoCC4 (Stanbury et al. 2024[1]). In the GB IUCN2a assessment it moved from 'Least Concern' in IUCN1 to 'Critically Endangered' (Stanbury et al. 2024). Seabirds Count (Burnell et al. 2023[2]) reported a 43% decline since Seabird 2000. We agree with the Applicant (response to ExQ1 Q1.17.16, REP3-062) that the revised status does not affect the species' sensitivity, but we do consider that it provides context to the potential consequences of any impact. The revised status demonstrates a prolonged and severe decline in the species in the United Kingdom, supported by both the IUCN assessment and monitoring coordinated by JNCC. While they are unlikely to be the sole cause of the declines experienced, the cumulative impact from OWF has the potential to worsen that decline, or to inhibit to some extent any recovery effort and we therefore do not agree with the conclusion of a minor adverse effect at EIA scale.

Based on consideration of the PVA metrics presented in Appendix D of REP3-044 demonstrating a reduced growth rate as a result of the cumulative impact of the Mona OWF project with other OWF than would be experienced by an unimpacted population, and that we are not aware of any evidence to suggest that the population is likely to increase during the lifetime of the project, we consider that the Mona OWF, cumulatively with other OWF projects, is likely to have a Moderate significant adverse impact as defined in Environmental Statement - Volume 1, Chapter 5: Environmental Impact Assessment Methodology (APP-052). Additionally, the uncertainties around demographic rates for the species, with juvenile and immature survival rates unknown (Horswill & Robinson 2015[3]), require a more precautionary approach to interpreting modelling results. **We are therefore unable to rule out a significant adverse impact on great black-backed gull from cumulative collision mortality at an EIA scale.**

[1] Stanbury, A.J., Burns, F., Aebischer, N.J., Baker, H., Balmer, D.E., Brown, A., Dunn, T., Lindley, P., Murphy, M., Noble, D.G., Owens, R. & Quinn, L. (2024) The status of the UK's breeding seabirds: an addendum to the fifth Birds of Conservation Concern in the United Kingdom, Channel Islands and Isle of Man and second IUCN Red List assessment of extinction risk for Great Britain. British Birds, 117: 471-487. https://britishbirds.co.uk/seabird-bocc5a

[2] Burnell, D., Perkins, A.J., Newton, S.F., Botlon, M., Tierney, T.D. & Dunn, T.E. (2023) Seabirds Count: A census of breeding seabirds in Britain and Ireland (2015–2021), Lynx Nature Books.

[3] Horswill, C. & Robinson R. A. 2015. Review of seabird demographic rates and density dependence. JNCC Report No. 552. Joint Nature Conservation Committee, Peterborough. https://data.jncc.gov.uk/data/897c2037-56d0-42c8-b828-02c0c9c12d13/JNCC-Report-552-REVISED-WEB.pdf

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In the case of the Mona OWF project, we recognise and welcome the commitment already made to raise turbine draught height to 30m above Mean Sea Level (Environmental Statement - Volume 6, Annex 5.3: Offshore ornithology collision risk modelling technical report Table 1.5, APP-093). We recognise that this will have reduced the predicted collision mortality arising from the Mona OWF project, resulting in the Mona OWF project contributing 4.83 mortalities per annum (Environmental Statement - Volume 2, Chapter 5: Offshore ornithology, Table A. 37, REP2-016) to the cumulative predicted total of up to 162.87 collisions per annum (Offshore Ornithology Cumulative Effects Assessment and In-combination Gap-filling Historical Projects Technical Note, Table A. 37. REP3-044). We do not therefore propose that the Applicant needs to implement additional mitigation measures.

However, JNCC is concerned that the impact on great black-backed gull within the south-west and Channel population BDPMS is likely to increase as further OWF projects are developed, notably those that will form part of The Crown Estate's Round 5 leasing round within the Celtic Seas area. Without major project-level mitigation being applied to all relevant projects coming forward, there is a significant risk of large-scale impacts on seabird populations. JNCC therefore recommends that for all relevant future projects raising turbine draught height should be considered as standard mitigation practice, and that where appropriate relevant proposals should include this measure in order to minimise their contributions to the cumulative/in-combination collision totals by as much as is possible.