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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):

REP3-044 Offshore Ornithology Cumulative Effects Assessment and In-combination Gap-filling Historical Projects Technical Note

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Overarching comments

We wish to make the Examining Authority aware that the issues raised in this response were discussed with the Applicant at a Mona offshore wind project offshore ornithology meeting on 29th October 2024 at which NRW were also present. Good progress was made in understanding of the remaining issues and how they may be addressed to our satisfaction, and therefore we are hopeful that the outstanding issues will be addressed over the coming deadlines to produce robust assessments of the impacts of the project. We will of course provide our advice as updated assessments are submitted to Examination.

We note the Examining Authority's comments made in Issue Specific Hearing 3 regarding documents submitted thus far containing errors, discrepancies, and lack of clarity, resulting in doubts regarding the credibility of the evidence and the confidence that we can have in the assessment. With this in mind, we are disappointed that the submissions made at Deadline 3, particularly the in-combination assessments within REP3-059 and REP3-044, are lacking in the clarity previously requested (providing all values which go into the calculation of in-combination apportioned mortality estimates, REP1-066 paragraph 13) and appear to go against SNCB advice previously given (use of stable age structure age-classes, REP1-066 paragraph 18, and seasonal definitions, REP2-097 JNCC response to RR-033.25). Some of this may be the result of not carrying over the correcting of previously identified errata.

We recommend that the results of this gap-filling exercise are subsequently used within the in-combination assessment, noting our detailed comments below. These results provide the most comprehensive estimate of mortalities at each project which was previously not quantified. We note that these results have been used within the four in-combination assessments carried out in this document (REP3-044, section 1.5), but have not been used within the in-combination assessments within REP3-059. Therefore, the in-combination assessments presented in REP3-059 contain a number of gaps and are not considered comprehensive.

We note that there are several projects which may affect cumulative effects assessment and in-combination assessment for offshore ornithology, and that additional work will be undertaken for Deadline 4 to understand the potential cumulative effects of these projects (REP3-058). We recommend that our comments on the in-combination assessment contained within our response to REP3-059 Offshore ornithology supporting information in line with SNCB advice and REP3-044 Offshore Ornithology Cumulative Effects Assessment and In-combination Gap-filling Historical Projects Technical Note are taken into account when undertaking this additional work.

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Specific comments

Table 1.8 page 28

We thank the Applicant for carrying out this exercise in comparing percentages of birds in flight at Awel Y Mor, and Mona, Morgan, and Morecambe offshore wind farms.

Section 1.5

It was previously suggested that SPA-apportioned impacts from publicly available, project-specific, documents or the Round 4 plan level HRA documentation would be used. However, where an apportioned impact was not presented, the apportioning value (e.g. the proportion of the species which is likely to have come from a specific colony) from a nearby offshore wind farm has been used as a proxy for the breeding season (APP-042, D.8.5, paragraphs 1.3.3.1 to 1.3.3.2). Could the Applicant confirm that this approach has been used for the in-combination HRA, and if so, provide this detail, including which other wind farm the proxy apportioning value has been taken from?

1.5.1.3

It is stated that the number of SPAs included within the in-combination HRA has not changed but the in-combination impacts need to be updated for the four sites previously considered in-combination. However, REP3-059 contains 37 in-combination assessments. Presumably it is because the four in-combination assessments carried out in REP3-044 do not account for using the full range of SNCB-advised displacement and mortalities rates, and when this is accounted for, more in-combination assessments are required. Given that the displacement in-combination assessments in REP3-044 do not account for using the full range of SNCB-advised displacement and mortalities rates, we are not in a position to comment on them. REP3-059 incorporates the full range of SNCB-advised displacement and mortalities rates, but does not include the gap-filling results (REP3-044), meaning impacts presented in REP3-059 are underestimated. Until an in-combination assessment which uses both the gap-filling results and the full range of SNCB-advised displacement and mortalities rates are provided, we cannot come to a conclusion on AEOSI in-combination for any SPA.

1.5.3.3, 1.5.4.3, & 1.5.5.3

“The age-class apportioning undertaken on the gap-filled project abundance estimates and collision estimates used Furness (2015) due to the lack of site-specific data available for each of the plans or projects.” We continue to advise that age classes derived from stable age structures, such as those in Furness (2015), are not used. We continue to advise that if there is no site-specific data available for each of the plans or projects, then all birds are

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assumed to be adults. This has been advised multiple times and in pre-application consultation and responses to application documents during the examination (APP-042, D.8.1, item no. 5; RR-033; REP1-066, paragraphs 50 to 51).

Table A.33

The wrong seasonal definitions appear to have been used for black-legged kittiwake to calculate seasonal gap-filled offshore wind farm estimates (breeding season of Apr to Aug rather than Mar to Aug, and pre-breeding season of Jan to Mar rather than Jan to Feb). Whilst this makes no difference to the EIA, when using these values for the HRA in-combination assessment, we recommend that the seasonal definitions are checked and seasonal mortalities recalculated, where necessary. This error had been previously raised (RR-033, paragraph 25 to 33), and subsequently corrected (REP2-087, change number F1.5 F02 5), however appears to remain in this document.

Table A.37

The wrong seasonal definitions appear to have been used for great black-backed gull to calculate seasonal gap-filled offshore wind farm estimates (breeding season of Apr to Aug rather than Mar to Aug, and non-breeding season of Sep to Mar rather than Sep to Feb). Whilst this makes no difference to the EIA, when using these values for the HRA in-combination assessment, we recommend that the seasonal definitions are checked and seasonal mortalities recalculated, where necessary. This error had been previously raised (RR-033, paragraph 25 to 33), and subsequently corrected (REP2-087, change number F1.5 F02 5), however appears to remain in this document.

Table A.48

The wrong seasonal definitions appear to have been used for northern gannet to calculate seasonal gap-filled offshore wind farm estimates. Whilst this makes no difference to the EIA, when using these values for the HRA in-combination assessment, we recommend that the seasonal definitions are checked and seasonal mortalities recalculated, where necessary. This error had been previously raised (RR-033, paragraph 25 to 33), and subsequently corrected (REP2-087, change number F1.5 F02 5), however appears to remain in this document.

References

Furness, R.W. (2015) Non-breeding season populations of seabirds in UK waters: Population sizes for Biologically Defined Minimum Population Scales (BDMPS). Natural England Commissioned Reports, Number 164