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MONA OFFSHORE WIND PROJECT

Response to JNCC D3 Submission - Response to Schedule of Changes to Offshore Ornithology

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Image of an offshore wind farm

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Prepared by:

RPS

Prepared for:

Mona Offshore Wind Ltd.

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Glossary

Term	Meaning
Applicant	Mona Offshore Wind Limited.
Appropriate Assessment	A step-wise procedure undertaken in accordance with Article 6(3) of the Habitats Directive, to determine the implications of a plan or project on a European site in view of the site's conservation objectives, where the plan or project is not directly connected with or necessary to the management of a European site but likely to have a significant effect thereon, either individually or in-combination with other plans or projects.
Development Consent Order (DCO)	An order made under the Planning Act 2008 granting development consent for one or more Nationally Significant Infrastructure Project (NSIP).
Mona Array Area	The area within which the wind turbines, foundations, inter-array cables, interconnector cables, offshore export cables and offshore substation platforms (OSPs) forming part of the Mona Offshore Wind Project will be located.
Mona Offshore Cable Corridor	The corridor located between the Mona Array Area and the landfall up to MHWS, in which the offshore export cables will be located.
Mona Offshore Wind Project	The Mona Offshore Wind Project is comprised of both the generation assets, offshore and onshore transmission assets, and associated activities.

Acronyms

Acronym	Description
DCO	Development Consent Order
EIA	Environmental Impact Assessment
HRA	Habitat Regulations Assessment
ISAA	Information to support the Appropriate Assessment
JNCC	Joint Nature Conservation Committee
LSE	Likely Significant Effect
MHWS	Mean High Water Springs
NRW	Natural Resources Wales
PVA	Population Viability Analysis
SNCB	Statutory Nature Conservation Body
SPA	Special Protection Area

Units

Unit	Description
%	Percentage

1 Response to JNCC D3 Submission - Response to Schedule of Changes to Offshore Ornithology

1.1 Introduction

1.1.1.1 The Applicant is taking a revised approach to errata following comments from the Examining Authority during the October Issue Specific Hearings. Volume 2, Chapter 5: Offshore ornithology (F2.5 F02) and Volume 6, Annex 5.2: Offshore Ornithology Displacement Technical Report (F6.5.2 F02) have been submitted as revised version at Deadline 4, which address the errata presented in the Offshore Ornithology Errata Clarification Note (REP3-073) and the Errata Sheet (REP3-075) submitted at Deadline 3. Therefore, with respect to these application documents, there are no longer any errata identified in the Errata Sheet and the Schedule of Changes to the Offshore Ornithology EIA (REP2-087) and Offshore Ornithology Errata Clarification Note (REP3-073) are considered to be obsolete.

1.1.1.2 There remains a small number of errata in the Errata Sheet (S_PD_1 F05) submitted at Deadline 4 with respect to the following offshore ornithology application documents:

- HRA Stage 2 Information to Support an Appropriate Assessment Part Three: Special Protection Areas and Ramsar sites Assessments (REP2-010)
- HRA Stage 1 Screening Report (REP2-012)
- Volume 6, Annex 5.5: Offshore Ornithology Apportioning Technical Report (REP2-022)
- Volume 6, Annex 5.6: Offshore Ornithology Population Viability Analysis Technical Report (REP2-024)

1.1.1.3 The Applicant has provided a response to each of the points raised in JNCCs response to the Schedule of Changes (REP3-085), in Section 2 below.

2 RESPONSE TO JNCC D3 SUBMISSION - RESPONSE TO SCHEDULE OF CHANGES TO OFFSHORE ORNITHOLOGYJOINT NATURE CONSERVATION COMMITTEE

2.1.1 Volume 2, Chapter 5: Offshore ornithology

Table 2.1: REP3-085 - Schedule of changes to Volume 2, Chapter 5: Offshore ornithology (F2.5 F03).

Cross reference to where change has been made	Summary of change	Change number	JNCC comment	Applicant's response
Table 5.25	This was reported in the Errata sheet at Deadline 1 (REP1-044) as a correction for a discrepancy in the Atlantic puffin seasonal mean peak estimate during the non-breeding season. The seasonal mean peak was updated to 22 birds from 0, which changes the impact to 0 to 1 birds, and the increase in baseline mortality to 0.000 to 0.002 during the non-breeding season. This in turn increases the annual abundance from 15 to 37; however, this does not change the impacted number or birds, or the respective increase in baseline mortality. There is no change to the conclusions of the assessment due to this change. Table 5.25 has been updated to include the months constituting each bio-season to provide additional clarity.	F1.5 F02 8	This does not have a material impact on the construction phase assessment. However, see comment on F1.5 F02 15 regarding the operational assessment.	The Applicant notes the JNCC's comment and agreement that this change does not alter the assessments for the construction phase. The Applicant has responded to change number F1.5 F02 15 below.
Table 5.28	Correction to Manx shearwater bio-season spring migration to 3 birds was presented in the Errata sheet at Deadline 1 (REP1-044); however, following a review of Volume 6, Annex 5.1: Offshore Ornithology Baseline Characterisation (APP-091) and Volume 6, Annex 5.2: Offshore Ornithology Displacement Technical Report (APP-092) the predicted abundances from March 2020 had been incorrectly excluded from Table A. 6 of Volume 6, Annex 5.2: Offshore Ornithology Displacement Technical Report (APP-092). Therefore, following the update to Volume 6, Annex 5.2: Offshore Ornithology Displacement Technical Report (F6.5.2 F02), the Year 1 peak abundance for spring migration is 6 birds (Table 1.4 of Volume 6, Annex 5.2: Offshore Ornithology Displacement Technical Report (F6.5.2 F02). The corrected Year 1 peak abundance of 6 birds and the as submitted Year 2 peak abundance of 6 birds means the Mean Peak is 6 birds (as presented previously). This has been updated in the Errata sheet at Deadline 2 (S_PD_1 F03). This update and correction means no amendments are required in Table 5.28 or Table 5.35 of Volume 2, Chapter 5: Offshore Ornithology (APP-057). This clarification is provided so that the SNCBs have sight of why this errata change has not been implemented. Table 5.28 has been updated to use the regional baseline population and mortality requested by the SNCBs. There is no change to the conclusions of the assessment due to this change. Table 5.28 has been updated to include the months constituting each bio-season to provide additional clarity.	F1.5 F02 12	Noted. APP-091 and APP-092 indicate that the April 2021 value is used as the peak in the 2nd pre-breeding season. However, the pre- breeding season for Manx shearwater is solely the month of March. Therefore, the March 2021 value (0) should be used as the peak of the 2nd pre-breeding season. This would result in a mean peak of 3 birds. However, as either 3 or 6 birds both result in a maximum of 0 displacement mortalities, we find this to be not material to the impact assessment.	The Applicant notes that the updated Volume 6, Annex 5.2: Offshore Ornithology Displacement Technical Report (REP2-018) has included April within the spring migration (or pre-breeding) season. However, as highlighted by the JNCC, the spring-migration (or pre-breeding season) is only March. Therefore, the peak in the second pre-breeding season should have been zero birds, providing a mean peak of 3 birds over the two survey years. This has been addressed within the Volume 6, Annex 5.2: Offshore Ornithology Displacement Technical Report (F6.5.2 F03) submitted at Deadline 4. Given that the displacement impact on 3 or 6 birds results in zero birds impacted (when considering 10% mortality and 70% displacement), the Applicant is content that this matter is resolved and the assessed impact on Manx shearwater in both the EIA and HRA documents remains valid.
Table 5.32	See change number F1.5 F02 8.	F1.5 F02 15	The change in seasonal mean peak for the non- breeding season to 22 birds results in a displacement impact of 2 birds using 70% displacement and 10% mortality. In addition to the I mortality in the breeding season, this gives an annual total of 3 mortalities. This does then have subsequent implications for the need for apportioning of impacts to SPAs.	The Applicant provided additional information with respect to Atlantic puffin within the Offshore Ornithology Supporting Information in line with SNCB Advice (REP3-059) note submitted at Deadline 3. This information considered Atlantic puffin in the breeding and non-breeding seasons, which accounts for the increase in birds during the non-breeding season and considered the full range of impact scenarios as advised by the JNCC. In light of stakeholder feedback since Deadline 3, the Applicant has submitted an update to the Offshore Ornithology Supporting Information in line with SNCB Advice (S_D3_19 F02) at Deadline 4, which includes the gap-filled

Cross reference to where change has been made	Summary of change	Change number	JNCC comment	Applicant's response
				projects within the in-combination assessments. This also includes the full apportioning for Atlantic puffin. Within this apportioning exercise for Atlantic puffin, the largest impact (in terms of number of birds and apportioning size during the breeding period) is apportioned to Skomer, Skokholm and the Seas off Pembrokeshire/Sgomer, Sgogwm a Moroedd Penfro SPA (at 63.70% during the breeding season and 3.47% during the non-breeding season). Based on the highly precautionary displacement and mortality rates of 70% and 10%, apportioning to this SPA would result in impacts on 0.7 birds annually (0.7 birds in the breeding season and 0.1 birds in the non-breeding season however due to rounding to one decimal place the annual impact is still 0.7 birds), which is an increase in baseline mortality of 0.01% (when considering the baseline mortality rate of 0.094 and a population of 57,796 from 2020/21 resulting in an annual baseline mortality of 5,433). Following the Applicant's method and agreed by the SNCBs for the Mona Offshore Wind Project it would not require in-combination assessment to be undertaken, as set out in Figure 1.1 of HRA Stage 2 Information to Support an Appropriate Assessment Part Three: Special Protection Areas and Ramsar sites Assessments (REP2-010). The Applicant maintains that it was not proportionate to screen in this feature or any associated SPAs at the LSE stage as there was not a plausible risk of LSE from the Mona Offshore Wind Project alone. However, the Applicant hopes this response and the updated apportioning assessment in the Offshore Ornithology Supporting Information in line with SNCB Advice (S_D3_19 F02) provides the necessary clarification to demonstrate that there is no risk of LSE on any SPA designated for Atlantic puffin (alone or in-combination).
Throughout section 5.9.	Corrected cumulative effects assessment with abundances and collision estimates for other projects agreed with the Morgan Offshore Wind Project: Generation Assets and the Morecambe Offshore Wind Farm: Generation Assets. There is no change to the conclusions of the assessment due to these changes.	F1.5 F02 32	Noted. We also note the Applicant's intention to submit the results of the gap-filling exercise at Deadline 3, thereafter which we will review the cumulative and in- combination assessments.	The Applicant welcomes the JNCC's comment and will provide any additional responses following the JNCC's review of Offshore Ornithology Cumulative Effects Assessment and In-combination Gap-filling Historical Projects Technical Note (S_D3_12) and Mona Offshore Ornithology Supporting Information (S_D3_19 F02) if required.
Table 5.61, 5.62, 5.63 and 5.64. Paragraphs 5.9.2.24 - 26	Corrected abundance estimate for Atlantic puffin within Project Erebus to 1,416 individuals during the breeding season and 160 individuals in the non-breeding season. Additional changes have been made to the Mona Offshore Wind Project impacts following other identified amendments during the non-breeding season). These changes in Table 5.61 lead to changes to the matrix Tables 5.62, 5.63 and 5.65 and paragraphs 5.9.2.24, 5.9.2.25 and 5.9.2.26. There is no change to the conclusions of the assessment due to these changes. There is no change to the conclusions of the assessment due to these changes.	F1.5 F02 34	Noted. We also note the Applicant's intention to submit the results of the gap-filling exercise at Deadline 3, thereafter which we will review the cumulative and in- combination assessments.	
Table 5.65, 5.66 and 5.69. Paragraphs 5.9.2.30 and 5.9.2.33	Corrected calculations for northern gannet and inclusion of correct Erebus abundances, this in turn led to amendments to paragraphs 5.9.2.30 and 5.9.2.33. There is no change to the conclusions of the assessment due to these changes.	F1.5 F02 35	Noted. We also note the Applicant's intention to submit the results of the gap-filling exercise at Deadline 3, thereafter which we will review the cumulative and in- combination assessments.	
Table 5.70, 5.71, 5.72 and 5.74.	Following the amendments to black-legged kittiwake bio-seasons, the impact of the Mona Offshore Wind Project has been amended in Table 5.70. The total abundance	F1.5 F02 36	Noted.	

Cross reference to where change has been made	Summary of change	Change number	JNCC comment	Applicant's response
Paragraphs 5.9.2.37, 5.9.2.38 and 5.9.2.40.	estimates per bio-season have also therefore changed. These changes in Table 5.70 lead to changes to the matrix Tables 5.71, 5.72 and 5.74 and paragraphs 5.9.2.37, 5.9.2.38 and 5.9.2.40. There is no change to the conclusions of the assessment due to these changes.		We also note the Applicant's intention to submit the results of the gap-filling exercise at Deadline 3, thereafter which we will review the cumulative and in- combination assessments.	
Table 5.75, 5.76, 5.78 and 5.79. Paragraphs 5.9.2.44, 5.9.2.46 and 5.9.2.47	Corrected cumulative abundances for the post-breeding season of Manx shearwater within Awel y Môr to 214 individuals and corrected the impacts from the Mona Offshore Wind Project following the bio-season change. The total abundance estimates per bio-season have also therefore changed. These in turn give rise to changes in Table 5.75, the matrix in Tables 5.76, 5.78 and 5.79 and paragraphs 5.9.2.44, 5.9.2.46 and 5.9.2.47. There is no change to the conclusions of the assessment due to these changes. Some of the changes were reported in the Errata sheet at Deadline 1 (REP1-044), including a correction to Manx shearwater predicted mortality to 7 (range 4 to 102) as a result of corrected total CEA post-breeding cumulative abundances during the construction phase for Manx shearwater in table 5.75. However, due to amendments to the seasonal months for the Mona Offshore Wind Project, the impact has been amended to 3 (2 to 44).	F1.5 F02 37	Noted. We also note the Applicant's intention to submit the results of the gap-filling exercise at Deadline 3, thereafter which we will review the cumulative and in- combination assessments.	
Table 5.81, 5.82, 5.83 and 5.84. Paragraphs 5.9.2.58, 5.9.2.59 and 5.9.2.60.	Corrected cumulative effects assessment with abundances and collision estimates for other projects agreed with the Morgan Offshore Wind Project: Generation Assets and the Morecambe Offshore Wind Farm: Generation Assets. These in turn give rise to changes in Table 5.81, the matrix Tables 5.82, 5.83 and 5.84 and paragraphs 5.9.2.58, 5.9.2.59 and 5.9.2.60. There is no change to the conclusions of the assessment due to these changes. Some changes were reported in the Errata Sheet at Deadline 1 (REP1-044) as a correction to guillemot cumulative abundances for Twinhub during the breeding season to 183. However, following a review of the documentation, the Twinhub abundance estimate has been corrected to 39 birds during the breeding season, 217 birds during the non-breeding season and therefore 256 annually.	F1.5 F02 38	Noted. We also note the Applicant's intention to submit the results of the gap-filling exercise at Deadline 3, thereafter which we will review the cumulative and in- combination assessments.	
Paragraphs 5.9.2.63 and 5.9.2.64	Following the amendments to the cumulative abundances within Table 5.81, a PVA needed to be rerun, and the new results have been presented in paragraphs 5.9.2.63 and 5.9.2.64	F1.5 F02 39	Noted. We also note the Applicant's intention to submit the results of the gap-filling exercise at Deadline 3, thereafter which we will review the cumulative and in- combination assessments.	
Table 5.86, 5.87, 5.88, 5.89, 5.90 and 5.91. Paragraphs 5.9.2.68, 5.9.2.69, 5.9.2.70, 5.9.2.71, 5.9.2.71 and 5.9.2.73	Corrected cumulative effects assessment with abundances and collision estimates for other plans or projects. These updates have been made as requested by NRW in their written representation (REP1-056) to align with numbers used by Morgan Offshore Wind Project: Generation Assets and the Morecambe Offshore Wind Farm: Generation Assets, which were refined following the submission of the Mona Offshore Wind Project development consent order application. These in turn give rise to changes in Table 5.86, the matrix Tables 5.87, 5.88, 5.89, 5.90 and 5.91 and paragraphs 5.9.2.68, 5.9.2.69, 5.9.2.70, 5.9.2.71, 5.9.2.71 and 5.9.2.73. There is no change to the conclusions of the assessment due to these changes.	F1.5 F02 40	Noted. We also note the Applicant's intention to submit the results of the gap-filling exercise at Deadline 3, thereafter which we will review the cumulative and in- combination assessments.	
Table 5.93, 5.94, 5.95 and 5.96. Paragraphs 5.9.2.77, 5.9.2.78 and 5.9.2.79	Corrected abundance estimate for Atlantic puffin within Project Erebus to 1,416 individuals during the breeding season and 160 individuals in the non-breeding season. In additional changes the Mona Offshore Wind Project impacts following other identified amendments during the non-breeding season). These changes in Table 5.61 led to changes to the matrix Tables 5.93, 5.94, 5.95 and 5.96 and paragraphs 5.9.2.77, 5.9.2.78 and 5.9.2.79. There is no change to the conclusions of the assessment due to these changes.	F1.5 F02 41	Noted. We also note the Applicant's intention to submit the results of the gap-filling exercise at Deadline 3, thereafter which we will review the cumulative and in- combination assessments.	

Cross reference to where change has been made	Summary of change	Change number	JNCC comment	Applicant's response
	There is no change to the conclusions of the assessment due to these changes.			
Table 5.98, 5.99, 5.100, 5.101 and 5.102. Paragraphs 5.9.2.83, 5.9.2.84, 5.9.2.85 and 5.9.2.86.	This was reported in the Errata Sheet at Deadline 1 (REP1-044) as a correction to northern gannet cumulative abundances cumulative total (all projects) to 7,119. However, following a review of the documentation, the abundance estimates for other plans and projects, the cumulative annual total is 7,689 birds. In addition, corrected cumulative effects assessment with abundances and collision estimates for other projects agreed with the Morgan Offshore Wind Project: Generation Assets and the Morecambe Offshore Wind Farm: Generation Assets have been presented in Table 5.98. These changes in Table 5.98 lead to changes to the matrix Tables 5.99, 5.100, 5.101 and 5.102 and paragraphs 5.9.2.83, 5.9.2.84, 5.9.2.85 and 5.9.2.86. There is no change to the conclusions of the assessment due to these changes.	F1.5 F02 42	Noted. We also note the Applicant's intention to submit the results of the gap-filling exercise at Deadline 3, thereafter which we will review the cumulative and in- combination assessments.	
Tables 5.104, 5.105, 5.106 and 5.108. Paragraphs 5.9.2.90, 5.9.2.91, 5.9.2.92 5.9.2.94 and 5.9.2.94	This was reported in the Errata sheet at Deadline 1 (REP1-044) as a correction to black-legged kittiwake cumulative total (all projects) to 25,897. However following an amendment to the breeding season months and a recalculation of the annual impact, the annual cumulative total is 26,665. Following the amendments to black-legged kittiwake bio-seasons, the impact of the Mona Offshore Wind Project has been amended in Table 5.104. The total abundance estimates per bio-season have also, therefore, changed. These changes in Table 5.104 lead to changes to the matrix Tables 5.105, 5.106 and 5.108 and paragraphs 5.9.2.90, 5.9.2.91, 5.9.2.92, 5.9.2.94 and 5.9.2.94. There is no change to the conclusions of the assessment due to these changes.	F1.5 F02 43	Noted. We also note the Applicant's intention to submit the results of the gap-filling exercise at Deadline 3, thereafter which we will review the cumulative and in- combination assessments.	
Tables Table 5.110, 5.111, 5.112, 5.113 and 5.114. Paragraphs 5.9.2.99, 5.9.2.100, 5.9.2.101 and 5.9.2.102	Corrected the impacts from the Mona Offshore Wind Project following the bio-season change. In addition, corrected cumulative effects assessment with abundances and collision estimates for other projects agreed with the Morgan Offshore Wind Project: Generation Assets and the Morecambe Offshore Wind Farm: Generation Assets in Table 5.112. The total abundance estimates per bio-season have also, therefore, changed. These in turn give rise to changes in Table 5.112, the matrix Tables 5.111, 5.112, 5.113 and 5.114 and paragraphs 5.9.2.99, 5.9.2.100, 5.9.2.101 and 5.9.2.102. There is no change to the conclusions of the assessment due to these changes.	F1.5 F02 44	Noted. We also note the Applicant's intention to submit the results of the gap-filling exercise at Deadline 3, thereafter which we will review the cumulative and in- combination assessments.	
Table 5.117.	Corrected cumulative effects assessment with abundances and collision estimates for other projects agreed with the Morgan Offshore Wind Project: Generation Assets and the Morecambe Offshore Wind Farm: Generation Assets in Table 5.117. In addition, corrected the Mona Offshore Wind Project seasonal impacts. The total collision estimates per bio-season have also, therefore, changed. These changes in Table 5.117 then change paragraph 5.9.3.8. There is no change to the conclusions of the assessment due to these changes.	F1.5 F02 50	Noted. We also note the Applicant's intention to submit the results of the gap-filling exercise at Deadline 3, thereafter which we will review the cumulative and in- combination assessments.	
Tables 5.119 and 5.120	Corrected cumulative effects assessment with abundances and collision estimates for other projects agreed with the Morgan Offshore Wind Project: Generation Assets and the Morecambe Offshore Wind Farm: Generation Assets in Table 5.119 and 5.120. In addition, corrected Awel y Môr impacts to use Band Option 2 figures for great black-backed gull, and corrected the Mona Offshore Wind Project seasonal impacts. The total collision estimates per bioseaon have also therefore changed. These changes in Table 5.119 and 5.120 then change paragraphs 5.9.3.12, 5.9.3.13, 5.9.3.14 and 5.9.3.15. There is no change to the conclusions of the assessment due to these changes.	F1.5 F02 51	Noted. We also note the Applicant's intention to submit the results of the gap-filling exercise at Deadline 3, thereafter which we will review the cumulative and in- combination assessments.	

Cross reference to where change has been made	Summary of change	Change number	JNCC comment	Applicant's response
Paragraph 5.9.3.14	This was reported in the Errata Sheet at Deadline 1 (REP1-044) as a correction to the estimated cumulative collision mortality during the nonbreeding/winter season for great black-backed gull for species-specific and group-specific avoidance rates is 11.61 and 66.00, respectively. However, following a review of the documentation, the abundance estimates for other plans and projects, and the correction of seasonal months, the correct impact is 10.73 birds when considering the species-specific and 72.72 when considering the species-group avoidance rate.	F1.5 F02 52	Noted. We also note the Applicant's intention to submit the results of the gap-filling exercise at Deadline 3, thereafter which we will review the cumulative and in- combination assessments.	
Table 5.122 and 5.123	Corrected expected annual collision mortality across relevant offshore wind farms for herring gull for Morecambe Offshore Windfarm Generation Assets annually to 3.42, during the breeding season to 0.93 and during the non-breeding season is 2.49. Corrected expected annual collision mortality across relevant offshore wind farms for herring gull for Morgan Offshore Windfarm Generation Assets during the breeding season is 2.57 and during the non-breeding season is 9.25. Corrected cumulative effects assessment with abundances and collision estimates for other projects agreed with the Morgan Offshore Wind Project: Generation Assets and the Morecambe Offshore Wind Farm: Generation Assets in Table 5.122 and 5.123. In addition, corrected Awel y Môr impacts to use Band Option 2 figures for herring gull. The total collision estimates per bio-season have also, therefore, changed. These changes in Table 5.122 and 5.123 then change paragraphs 5.9.3.21 and 5.9.3.22. There is no change to the conclusions of the assessment due to these changes.	F1.5 F02 55	Noted. We also note the Applicant's intention to submit the results of the gap-filling exercise at Deadline 3, thereafter which we will review the cumulative and in- combination assessments.	
Table 5.125 and 5.126	Corrected cumulative effects assessment with abundances and collision estimates for other projects agreed with the Morgan Offshore Wind Project: Generation Assets and the Morecambe Offshore Wind Farm: Generation Assets in Table 5.125 and 5.126. The total collision estimates per bio-season have also, therefore, changed. These changes in Table 5.125 and 5.126 then change paragraphs 5.9.3.26 and 5.9.3.27. There is no change to the conclusions of the assessment due to these changes.	F1.5 F02 56	Noted. We also note the Applicant's intention to submit the results of the gap-filling exercise at Deadline 3, thereafter which we will review the cumulative and in- combination assessments.	
Table 5.128	This was reported in the Errata sheet at Deadline 1 (REP1-044) as correction to the text to state annual collision mortality for northern gannet cumulative total (all projects) to 160.09. However following a review of the documentation, the abundance estimates for other plans and projects the correct total is 164.91. Corrected cumulative effects assessment with abundances and collision estimates for other projects agreed with the Morgan Offshore Wind Project: Generation Assets and the Morecambe Offshore Wind Farm: Generation Assets in Table 5.128. The total collision estimates per bio-season have also, therefore, changed. These changes in Table 5.128 then change paragraphs 5.9.3.31 and 5.9.3.32. There is no change to the conclusions of the assessment due to these changes.	F1.5 F02 58	Noted. We also note the Applicant's intention to submit the results of the gap-filling exercise at Deadline 3, thereafter which we will review the cumulative and in- combination assessments.	
Paragraph 5.9.3.31	This was reported in the Errata Sheet at Deadline 1 (REP1-044) as a correction to the text to state estimated cumulative collision mortality of northern gannet from the relevant projects with available data is 160.09 per year. However following a review of the documentation, the abundance estimates for other plans and projects the correct total is 164.91. There is no change to the conclusions of the assessment due to this change.	F1.5 F02 59	Noted. We also note the Applicant's intention to submit the results of the gap-filling exercise at Deadline 3, thereafter which we will review the cumulative and in- combination assessments.	

Cross reference to where change has been made	Summary of change	Change number	JNCC comment	Applicant's response
Paragraph 5.9.3.32	This was reported in the Errata sheet at Deadline 1 (REP1-044) as a correction to the text to state the addition of 160.09 mortalities for northern gannet. However following a review of the documentation, the abundance estimates for other plans and projects the correct total is 164.91. There is no change to the conclusions of the assessment due to this change.	F1.5 F02 60	Noted. We also note the Applicant's intention to submit the results of the gap-filling exercise at Deadline 3, thereafter which we will review the cumulative and in- combination assessments.	
Tables 5.137 and 5.138	Following the corrections to the cumulative tables for black-legged kittiwake (Tables 5.104 and 5.117) and northern gannet (Tables 5.98 and 5.128) the combined tables (Table 5.137 and 5.138, respectively have been updated). Paragraphs 5.9.4.4, 5.9.4.5, 5.9.4.8 and 5.9.4.9 are subsequently updated. There is no change to the conclusions of the assessment due to these changes.	F1.5 F02 63	Noted. We also note the Applicant's intention to submit the results of the gap-filling exercise at Deadline 3, thereafter which we will review the cumulative and in- combination assessments.	

2.1.2 Volume 6, Annex 5.2: Offshore Ornithology Displacement Technical Report

Table 2.2: Schedule of changes to Volume 6, Annex 5.2: Offshore Ornithology Displacement Technical Report (F6.5.2 F02 and REP2-018).

Cross reference to where change has been made	Summary of change	Change number	JNCC comment	Applicant's response
Table 1.4	Following a review of Volume 6, Annex 5.1: Offshore Ornithology Baseline Characterisation (APP-091), the predicted abundances of Manx shearwater from March 2020 had been incorrectly excluded from Table A. 6 of Volume 6, Annex 5.2: Offshore Ornithology Displacement Technical Report (APP-092) – see change F6.5.2 F02 15. Therefore, following the update to Table A. 6, the Year 1 peak abundance for spring migration is 6 birds. This also changes the Mean Peak from 3 to 6 birds within Table 1.4.	F6.5.2 F02 3	We agree that the peak in the Year 1 pre-breeding season is 6 (based on March 2020). However, the peak in the Year 2 pre- breeding season appears to have been taken from April 2021. The pre-breeding season for Manx shearwater is solely the month of March. Therefore the March 2021 value (0) should be used as the peak of the 2nd pre- breeding season. This would result in a mean peak of 3 birds. However, as either 3 or 6 birds both result in a maximum of 0 displacement mortalities, we find this to be not material to the impact assessment.	See Applicant's response to change number F1.5 F02 12.
Table 1.35	Change in the pre-breeding seasonal abundance of Manx shearwater (see change F6.5.2 F02 2 and F6.5.2 F02 3), results in the matrix table also needing to be updated.	F6.5.2 F02 9	See response to F6.5.2 F02 3	See Applicant's response to change number F1.5 F02 12.
Table 1.38	Change in the pre-breeding seasonal abundance of Manx shearwater (see change F6.5.2 F02 2 and F6.5.2 F02 3), results in the matrix table also needing to be updated.	F6.5.2 F02 11	See response to F6.5.2 F02 3	See Applicant's response to change number F1.5 F02 12.
Table A. 6	Added the March 2020 data, which had been incorrectly missed (see change F6.5.2 F02 3) and updated the September 2020 data, which was also incorrect.	F6.5.2 F02 15	See response to F6.5.2 F02 3	See Applicant's response to change number F1.5 F02 12.

2.1.3 Volume 6, Annex 5.5: Offshore ornithology apportioning technical report

Table 2.3: Schedule of changes to Volume 6, Annex 5.5: Offshore ornithology apportioning technical report (F6.5.5 F02 and REP2-022).

Cross reference to where change has been made	Summary of change	Change number	JNCC comment	Applicant's response
Paragraph 1.3.5.1 and 1.3.5.2	Addition of text within the method to apportion birds during the non-breeding season to provide the SNCBs with additional clarity and to correct the method – as done in the application.	F6.5.5 F02 13	See full explanation in "Appendix: Response to change number F6.5.5 F02 13" at the end of this document.	The Applicant has provided responses to the JNCC's detailed comments for change number F6.5.5 F02 13 within Table 2.8.

2.1.4 Volume 6, Annex 5.6: Offshore ornithology population viability analysis technical report

Table 2.4: Schedule of changes to Volume 6, Annex 5.6: Offshore ornithology population viability analysis technical report (F6.5.6 F02 and REP2-024).

Cross reference to where change has been made	Summary of change	Change number	JNCC comment	Applicant's response
Table 1.6	Corrected the table in light of changes to the cumulative impact totals from Volume 2, Chapter 5: Offshore Ornithology (F2.5 F02). Title changed for added clarity as to what is shown in the table. There is no change to the conclusions of the assessment due to this change.	F6.5.6 F02 7	Noted. We also note the Applicant's intention to submit the results of the gap-filling exercise at Deadline 3, thereafter which we will review the cumulative and in-combination assessments.	The Applicant welcomes the JNCC's comment and will provide any additional responses following JNCC's review of Offshore Ornithology Cumulative Effects Assessment and In-combination Gap-filling Historical Projects Technical Note (S_D3_12 F02) if required. The Applicant notes that the Volume 6, Annex 5.6: Offshore ornithology population viability analysis technical report is not linked to the Offshore Ornithology Cumulative Effects Assessment and In-combination Gap-filling Historical Projects Technical Note (S_D3_12 F02)
Appendix A	The updates to the PVAs have been undertaken using revised input parameters. Appendix A has been updated with input parameters used for the rerun PVA. Specifically the changes relate to an amendment to the burn in period and impact on survival rate. Appendix A.2 has an updated output table following the rerun of the PVA.	F6.5.6 F02 13	There are no tracked changes in relation to the burn in period and it appears to be the same as in the previous version of the document. What burn-in period amendment has been made? What does appear to have changed is the production of outputs, which for the cumulative guillemot PVA is now in the metric of the whole population, rather than breeding adults. This appears to be the only PVA to include this change, with no reason as to this change. Further clarification is required on this.	The Applicant can confirm that **no** change to the burn in period was undertaken, as suggested by F6.5.6 F02 13. As such, there is no amendment between Volume 6, Annex 5.6: Offshore Ornithology Population Viability Analysis Technical Report versions F01 (APP-096) and F02 (REP2-024), and thus, no track changes for the burn-in period presented in Volume 6, Annex 5.6: Offshore Ornithology Population Viability Analysis Technical Report versions and F02 (Tracked) (REP2-025) is correct. In relation to the Population Viability Analysis (PVA) for common guillemot, the Applicant confirms that the output metric was amended from 'breeding.adults' to 'whole.population' as the input metric was 'whole.population'. The population being assessed (the cumulative impact on common guillemot within the UK Wester Waters biologically defined minimum population scales (BDMPS) includes all age-classes of individuals. It is considered best practice to present the output using the same population metric as the input. This change does not alter the conclusions of the assessments.

2.1.5 HRA Stage 1 Screening Report

Table 2.5: Schedule of changes to HRA Stage 1 Screening Report (E1.4 F02 and REP2-012).

Cross reference to where change has been made	Summary of change	Change number	JNCC comment	Applicant's response
Table 1.61	The impact on black-legged kittiwake from Lambay Island SPA has changed from 0.4 to 0.6 birds due to changes in the bio-seasons in point b of paragraph 1.4.6.42. The increase in annual abundance of Atlantic puffin during the non-apportioned impact from 0.0 birds to 0.1 birds in point b of paragraph 1.4.6.42. There is no change to the conclusion of the screening assessment following this change.	E1.4 F02 11	We do not agree with the treatment of Atlantic puffin displacement assessment within the HRA. Predicted mortalities are 0 to 3 birds annually based on the range of displacement and mortality rates. The Applicant's own approach is to take site features through to Appropriate Assessment where apportioned impacts are greater than 0.0 mortalities. Therefore, displacement impacts to Atlantic puffin should be apportioned to the SPA, and if apportioned impacts are greater than 0.0 mortalities then the feature is taken through to Appropriate Assessment. Given that further submission is expected at Deadline 3, including tables describing the calculation of apportioned mortalities and use of the full range of displacement and mortality rates, we will await receipt of this submission before commenting on the HRA.	See Applicant's response to change number F1.5 F02 15.
Table 1.62	The impact on black-legged kittiwake from Howth Head Coast SPA has changed from 0.2 to 0.3 birds due to changes in the bio-seasons in point b of paragraph 1.4.6.43. There is no change to the conclusion of the screening assessment following this change.	E1.4 F02 12	Given that further submission is expected at Deadline 3, including tables describing the calculation of apportioned mortalities and use of the full range of displacement and mortality rates, we will await receipt of this submission before commenting on the HRA.	The Applicant welcomes the JNCC's comment and will provide any additional responses following JNCC's review of Offshore Ornithology Cumulative Effects Assessment and In-combination Gap-filling Historical Projects Technical Note (S_D3_12 F02) and Offshore Ornithology Supporting Information in line with SNCB advice (S_D3_19 F02) if required.
Tables 1.65	Updated the predicted collision impact on black-legged kittiwake from Wicklow Head SPA from 0.0 to 0.1 birds in point c of paragraph 1.4.6.39. This amendment means Wicklow Head SPA is taken through to HRA Stage 2 and is now included in Table 1.125 (see change E1.4 F02 36).	E1.4 F02 13	See response to E1.4 F02 12	See Applicant's response to change number E1.4 F02 12.
Tables 1.66	The impact on northern gannet from Ailsa Craig SPA has changed from 1.7 to 1.8 birds due to changes in the bio-seasons in point b of paragraph 1.4.6.47. There is no change to the conclusion of the screening assessment following this change.	E1.4 F02 14	See response to E1.4 F02 12	See Applicant's response to change number E1.4 F02 12.
Table 1.67	The impact on black-legged kittiwake from Rathlin Island SPA has changed from 0.8 to 1.4 birds due to changes in the bio-seasons in point b of paragraph 1.4.6.48. The increase in annual abundance of Atlantic puffin during the non-apportioned impact from 0.0 birds to 0.1 birds in point b of paragraph 1.4.6.48. There is no change to the conclusion of the screening assessment following this change.	E1.4 F02 15	See response to E1.4 F02 11	See Applicant's response to change number E1.4 F02 11.
Table 1.68	The impact on black-legged kittiwake from Skomer, Skokholm and the Seas off Pembrokeshire SPA has changed from 0.0 to 0.1 black-legged kittiwake due to changes in the bio-seasons in point b of paragraph 1.4.6.49. Lesser black-backed gull has changed from 0.0 birds annual, to between 0.1 and 0.2 due to recalculations of the combined seasonal impact. This is presented in point c of paragraph 1.4.6.49. Both of these species are now taken through to HRA Stage 2 and included in Table 1.125 (see change E1.4 F02 36).	E1.4 F02 16	See response to E1.4 F02 12	See Applicant's response to change number E1.4 F02 12.

Cross reference to where change has been made	Summary of change	Change number	JNCC comment	Applicant's response
Tables 1.69	The impact on northern gannet from Grassholm SPA has changed from 0.5 to 0.6 birds due to changes in the bio-seasons in point b of paragraph 1.4.6.50. There is no change to the conclusion of the screening assessment following this change.	E1.4 F02 17	See response to E1.4 F02 12	See Applicant's response to change number E1.4 F02 12.
Table 1.70	The increase in annual abundance of Atlantic puffin during the non-apportioned impact from 0.0 birds to 0.1 birds in point b of paragraph 1.4.6.51. There is no change to the conclusion of the screening assessment following this change.	E1.4 F02 18	See response to E1.4 F02 11	See Applicant's response to change number E1.4 F02 11.
Table 1.71	The impact on black-legged kittiwake from North Colonsay and Western Cliffs SPA has changed from 0.1 to 0.6 birds due to changes in the bio-seasons in point b of paragraph 1.4.6.48. There is no change to the conclusion of the screening assessment following this change.	E1.4 F02 19	See response to E1.4 F02 12	See Applicant's response to change number E1.4 F02 12.
Table 1.78	Common guillemot has been added to the tables for Shiant Isles SPA for non-breeding season assessment. The impact on common guillemot during the non-breeding season is 0.3 birds (point b of paragraph 1.4.6.59) and therefore the species is taken through to HRA Stage 2 and included in Table 1.125 (see change E1.4 F02 36). The increase in annual abundance of Atlantic puffin during the non-apportioned impact from 0.0 birds to 0.1 birds in point b of paragraph 1.4.6.59. There is no change to the conclusion of the screening assessment following this change.	E1.4 F02 20	See response to E1.4 F02 11	See Applicant's response to change number E1.4 F02 11.
Table 1.79 and points b and c of paragraph 1.4.6.60	Northern gannet was incorrectly excluded from the HRA Stage 1 Screening report for Skelligs SPA, but it is now included. The impact is predicted to be 0.1 birds, and therefore, the species is taken through to HRA Stage 2 and included in Table 1.125 (see change E1.4 F02 37). Points b and c of paragraph 1.4.6.60 were also updated with the inclusion of northern gannet.	E1.4 F02 21	See response to E1.4 F02 12	See Applicant's response to change number E1.4 F02 12.
Table 1.82	The impact on black-legged kittiwake from Cape Wrath SPA has changed from 0.6 to 0.8 birds due to changes in the bio-seasons in point b of paragraph 1.4.6.63. There is no change to the conclusion of the screening assessment following this change.	E1.4 F02 22	See response to E1.4 F02 12	See Applicant's response to change number E1.4 F02 12.
Table 1.83	The increase in annual abundance of Atlantic puffin during the non-apportioned impact from 0.0 birds to 0.1 birds in point b of paragraph 1.4.6.64. There is no change to the conclusion of the screening assessment following this change.	E1.4 F02 23	See response to E1.4 F02 11	See Applicant's response to change number E1.4 F02 11.
Table 1.84	The impact on black-legged kittiwake from Flamborough and Filey Coast SPA has changed from 0.1 to 1.0 birds due to changes in the bio-seasons in point b of paragraph 1.4.6.65. There is no change to the conclusion of the screening assessment following this change.	E1.4 F02 24	See response to E1.4 F02 12	See Applicant's response to change number E1.4 F02 12.
Table 1.85	The increase in annual abundance of Atlantic puffin during the non-apportioned impact from 0.0 birds to 0.1 birds in point b of paragraph 1.4.6.66. There is no change to the conclusion of the screening assessment following this change.	E1.4 F02 25	See response to E1.4 F02 11	See Applicant's response to change number E1.4 F02 11.
Table 1.86	The increase in annual abundance of Atlantic puffin during the non-apportioned impact from 0.0 birds to 0.1 birds in point b of paragraph 1.4.6.67. There is no change to the conclusion of the screening assessment following this change.	E1.4 F02 26	See response to E1.4 F02 11	See Applicant's response to change number E1.4 F02 11.
Table 1.87	The impact on black-legged kittiwake from Fowlsheugh SPA has changed from 0.1 to 0.3 birds due to changes in the bio-seasons in point b of paragraph 1.4.6.68. There is no change to the conclusion of the screening assessment following this change.	E1.4 F02 27	See response to E1.4 F02 12	See Applicant's response to change number E1.4 F02 12.
Table 1.91	The impact on great black-backed gull from Isles of Scilly SPA has changed from 0.4 to 0.6 birds due to changes in the bio-seasons and age-class apportioning in point c	E1.4 F02 28	See response to E1.4 F02 12	See Applicant's response to change number E1.4 F02 12.

Cross reference to where change has been made	Summary of change	Change number	JNCC comment	Applicant's response
	of paragraph 1.4.6.72. There is no change to the conclusion of the screening assessment following this change.			
Table 1.92	The impact on black-legged kittiwake from Troup, Pennan and Lions Heads SPA has changed from 0.3 to 0.4 birds due to changes in the bio-seasons in point b of paragraph 1.4.6.73. There is no change to the conclusion of the assessment following this change.	E1.4 F02 29	See response to E1.4 F02 12	See Applicant's response to change number E1.4 F02 12.
Table 1.93	The impact on black-legged kittiwake from East Caithness Cliffs SPA has changed from 0.7 to 1.1 birds due to changes in the bio-seasons in point b of paragraph 1.4.6.74. There is no change to the conclusion of the screening assessment following this change.	E1.4 F02 30	See response to E1.4 F02 12	See Applicant's response to change number E1.4 F02 12.
Table 1.95	The increase in annual abundance of Atlantic puffin during the non-apportioned impact from 0.0 birds to 0.1 birds in point b of paragraph 1.4.6.76. There is no change to the conclusion of the screening assessment following this change.	E1.4 F02 31	See response to E1.4 F02 11	See Applicant's response to change number E1.4 F02 11.
Table 1.99	The increase in annual abundance of Atlantic puffin during the non-apportioned impact from 0.0 birds to 0.1 birds in point b of paragraph 1.4.6.80. There is no change to the conclusion of the screening assessment following this change.	E1.4 F02 32	See response to E1.4 F02 11	See Applicant's response to change number E1.4 F02 11.
Table 1.101	The increase in annual abundance of Atlantic puffin during the non-apportioned impact from 0.0 birds to 0.1 birds in point b of paragraph 1.4.6.82. There is no change to the conclusion of the screening assessment following this change.	E1.4 F02 33	See response to E1.4 F02 11	See Applicant's response to change number E1.4 F02 11.
Table 1.102	The increase in annual abundance of Atlantic puffin during the non-apportioned impact from 0.0 birds to 0.1 birds in point b of paragraph 1.4.6.83. There is no change to the conclusion of the screening assessment following this change.	E1.4 F02 34	See response to E1.4 F02 11	See Applicant's response to change number E1.4 F02 11.
Paragraph 1.6.1.7	Paragraph 1.6.1.7 has been updated from 33 to 36 SPAs following the amended tables as explained above in this Schedule of Change document.	E1.4 F02 35	See response to E1.4 F02 12	See Applicant's response to change number E1.4 F02 12.
Paragraph 1.6.1.9	Paragraph 1.6.1.9 has been updated from 32 to 35 SPAs following the amended tables as explained above in this Schedule of Change document.	E1.4 F02 36	See response to E1.4 F02 12	See Applicant's response to change number E1.4 F02 12.
Table 1.125	Following the updated assessments, several species and sites have now been taken through from the HRA Stage 1 Screening to HRA Stage 2 ISAA. These changes are presented in E1.4 F02 10, 13, 16 and 20) In addition to the points made within changes E1.4 F02 10, 13, 16 and 20 Table 1.125 was amended by changing the qualifying feature of Canna and Sanday SPA from black-legged kittiwake to common guillemot.	E1.4 F02 37	See response to E1.4 F02 12	See Applicant's response to change number E1.4 F02 12.
Section A.2.1 – common guillemot	Section A.2.1 has been amended following a recalculation of the displacement impacts and age-class apportioning. All sites considered during the non-breeding season have an amended impact. The changes to each individual site with common guillemot as a feature are detailed within this schedule of change table.	E1.4 F02 38	See response to E1.4 F02 12	See Applicant's response to change number E1.4 F02 12.
Section A.2.2 – razorbill	Section A.2.2 has been amended following a recalculation of the displacement impacts and age-class apportioning. Most sites considered during the non-breeding season have an amended impact. Within Table A 3, Flannan Islands SPA has been removed as it was incorrectly included. The changes to each individual site with razorbill as a feature are detailed within this schedule of change table.	E1.4 F02 39	See response to E1.4 F02 12	See Applicant's response to change number E1.4 F02 12.
Section A.2.3 – northern gannet	Section A.2.3 has been amended following a recalculation of the annual displacement and collision impacts and age-class apportioning. Most sites	E1.4 F02 40	See response to E1.4 F02 12	See Applicant's response to change number E1.4 F02 12.

Cross reference to where change has been made	Summary of change	Change number	JNCC comment	Applicant's response
	considered during the breeding season (Table A 4) have an amended impact; however, only two SPAs considered during the non-breeding season had an amended impact (Table A 5). The changes to each individual site with northern gannet as a feature are detailed within this schedule of change table.			
Section A.2.4 – black-legged kittiwake (displacement)	At the request of NRW, the displacement and collision impacts have been separated; therefore, all impacts presented for the breeding (Table A 6) and non-breeding season (Table A 7) have been amended. West Westray SPA has incorrectly been omitted from Table A 7 but is now included. The changes to each individual site with black-legged kittiwake as a feature are detailed within this schedule of change table.	E1.4 F02 41	See response to E1.4 F02 12	See Applicant's response to change number E1.4 F02 12.
Section A.2.5 – herring gull	Section A.2.5 has been amended following a recalculation of the annual collision impacts and age-class apportioning; all sites considered during the non-breeding season have an amended impact. The changes to each individual site with herring gull as a feature are detailed within this schedule of change table.	E1.4 F02 43	See response to E1.4 F02 12	See Applicant's response to change number E1.4 F02 12.
Section A.2.6 – lesser black-backed gull	Section A.2.6 has been amended following a recalculation of the annual collision impacts and age-class apportioning. There is only one change during the breeding season, and two sites have changes during the non-breeding season. The changes to each individual site with lesser black-backed gull as a feature are detailed within this schedule of change table.	E1.4 F02 44	See response to E1.4 F02 12	See Applicant's response to change number E1.4 F02 12.
Section A.2.7 – great black-backed gull	Section A.2.7 has been amended following a recalculation of the annual collision impacts following bioseaon and age-class apportioning correction. Only the Isles of Scilly SPA is considered for this species, for which amendments have been made. The changes to each individual site with great black-backed gull as a feature are detailed within this schedule of change table.	E1.4 F02 45	See response to E1.4 F02 12	See Applicant's response to change number E1.4 F02 12.
Section A.2.8 – Manx shearwater	Section A.2.8 has been amended following a recalculation of the annual collision and displacement impacts following age-class apportioning and bio-season correction. No amendments occur during the breeding season (A 15), but some impacts apportioned to sites in the non-breeding season have changed (A 16). The changes to each individual site with Manx shearwater as a feature are detailed within this schedule of change table.	E1.4 F02 46	See response to E1.4 F02 12	See Applicant's response to change number E1.4 F02 12.

2.1.6 HRA Stage 2 ISAA Part Three: Special Protection Areas and Ramsar sites Assessments

Table 2.6: Schedule of changes to HRA Stage 2 ISAA Part Three: Special Protection Areas and Ramsar sites Assessments (E1.3 F02 and REP2-010).

Cross reference to where change has been made	Summary of change	Change number	JNCC comment	Applicant's response
Paragraph 1.3.1.3 and bullets below	The number of SPAs considered within this document has changed from 33 to 36 following the update to multiple species from bio-season definition changes, age-class apportioning changes and recalculation of annual impacts. The additional 3 SPAs now included in the document are Morecambe Bay and Duddon Estuary SPA, Wicklow Head SPA and Skelligs SPA – these three sites are also added to Table 1.2.	E1.3 F02 1	See response to E1.4 F02 12.	See Applicant's response to change number E1.4 F02 12.
Table 1.2	Inclusion of three additional SPAs, their relevant qualifying features and the impacts considered – see change number 1. Inclusion of lesser black-backed gull for Skomer, Skokholm and the Seas off Pembrokeshire/Sgomer, Sgogwm a Moroedd Penfro SPA following recalculations of impacts. Inclusion of the impact 'collision risk (lesser black-backed gull and black-legged kittiwake only)' as previously excluded. Correction of the relevant qualifying feature of Canna and Sanday SPA from black-legged kittiwake to common guillemot. This also amended the impacts considered. Inclusion of common guillemot as a relevant qualifying feature of Shiant Isles SPA.	E1.3 F02 2	See response to E1.4 F02 12	See Applicant's response to change number E1.4 F02 12.
Table 1.4	See change number E1.3 FO2 1 and E1.3 FO2 2 for corrections and additions to Table 1.4.	E1.3 F02 3	See response to E1.4 F02 12	See Applicant's response to change number E1.4 F02 12.
Table 1.9	Amending the collision impacts on lesser black-backed gull from Ribble and Alt Estuaries SPA and Ramsar site due to amendments to the bio-season definition, age-class apportioning and calculating annual impacts. There is no change to the conclusion of the assessment following this change.	E1.3 F02 4	See response to E1.4 F02 12	See Applicant's response to change number E1.4 F02 12.
Paragraph 1.5.3.12 – 14 and Table 1.11	Inclusion of Morecambe Bay and Duddon Estuary SPA following amendments to the bio-season definition, age-class apportioning and calculating annual impacts for lesser black-backed gull.	E1.3 F02 6	See response to E1.4 F02 12	See Applicant's response to change number E1.4 F02 12.
Table 1.12	Amending the collision impacts on lesser black-backed gull from Bowland Fells SPA site due to amendments to the bio-season definition, age-class apportioning and calculating annual impacts. There is no change to the conclusion of the assessment following this change.	E1.3 F02 7	See response to E1.4 F02 12	See Applicant's response to change number E1.4 F02 12.
Paragraph 1.5.3.18 and 1.5.3.20 and Table 1.13	Removing the incorrect reference to 'collision risk' for Manx shearwater for Glannau Aberdaron ac Ynys Enlli/Aberdaron Coast and Bardsey Island SPA. Collision risk was screened out (within the HRA Stage 1 Screening (E.1.4 F02), as the annual impact (before apportioning) was 0.0 birds. There is no change to the conclusion of the assessment following this change. Amending the displacement impact on Manx shearwater due to amendments to the bio-season definition, age-class apportioning and calculating annual impacts. There is no change to the conclusion of the assessment following this change.	E1.3 F02 8	See response to E1.4 F02 12	See Applicant's response to change number E1.4 F02 12.
Table 1.14 and paragraphs 1.5.3.22, 1.5.3.23 and 1.5.3.24.	Separating the displacement and collision impact on black-legged kittiwake due to a request from NRW and also altering the combined impact numbers due to amendments to the bio-season definition, age-class apportioning and calculating annual impacts at Lambay Island SPA. Due to these changes, the site is taken through an in-combination assessment (section 1.5.4) – see change E1.3 F02 43.	E1.3 F02 9	See response to E1.4 F02 12	See Applicant's response to change number E1.4 F02 12.
Table 1.15 and paragraphs 1.5.3.26,	Separating the displacement and collision impact on black-legged kittiwake due to a request from NRW and also altering the combined impact numbers due to amendments to the bio-season definition, age-class apportioning and calculating	E1.3 F02 10	See response to E1.4 F02 12	See Applicant's response to change number E1.4 F02 12.

Cross reference to where change has been made	Summary of change	Change number	JNCC comment	Applicant's response
1.5.3.27 and 1.5.3.28.	annual impacts at Howth Head Coast SPA. Due to these changes, the site is taken through an in-combination assessment (section 1.5.4) – see change E1.3 F02 43.			
Table 1.16 and paragraphs 1.5.3.30, 1.5.3.31 and 1.5.3.32.	Separating the displacement and collision impact on black-legged kittiwake due to a request from NRW and also altering the combined impact numbers due to amendments to the bio-season definition, age-class apportioning and calculating annual impacts at Ireland's Eye SPA. Due to these changes, the site is taken through an in-combination assessment (section 1.5.4) – see change E1.3 F02 43.	E1.3 F02 11	See response to E1.4 F02 12	See Applicant's response to change number E1.4 F02 12.
Paragraph 1.5.3.33 and 1.5.3.35 and Table 1.17	Removing the incorrect reference to 'collision risk' for Manx shearwater for Copeland Islands SPA. Collision risk was screened out (within the HRA Stage 1 Screening (E.1.4 F02), as the annual impact (before apportioning) was 0.0 birds. There is no change to the conclusion of the assessment following this change. Amending the displacement impact on Manx shearwater due to amendments to the bio-season definition, age-class apportioning and calculating annual impacts. There is no change to the conclusion of the assessment following this change.	E1.3 F02 12	See response to E1.4 F02 12	See Applicant's response to change number E1.4 F02 12.
Table 1.18, paragraph 1.5.3.37	Separating the displacement and collision impact on black-legged kittiwake due to a request from NRW and also altering the combined impact numbers due to amendments to the bio-season definition, age-class apportioning and calculating annual impacts at Rathlin Island SPA. There is no change to the conclusion of the assessment following this change. Amending displacement impacts on razorbill and common guillemot due to amendments to age-class apportioning and calculating annual impacts at Rathlin Island SPA. There is no change to the conclusion of the assessment following this change.	E1.3 F02 13	See response to E1.4 F02 12	See Applicant's response to change number E1.4 F02 12.
Table 1.19, paragraphs 1.5.3.40 -43	Amendments to the species considered for Skomer, Skokholm and the Seas off Pembrokeshire/Sgomer, Sgogwm a Moroedd Penfro SPA – see change number E1.3 F02 2. Amendments to the impacts of all species considered due to amendments to the bio-season definition, age-class apportioning and calculating annual impacts. There is no change to the conclusion of the assessment following this change.	E1.3 F02 14	See response to E1.4 F02 12	See Applicant's response to change number E1.4 F02 12.
Table 1.20	Amendments to the collision and displacement impacts on northern gannet from Grassholm SPA due to amendments to the bio-season definition, age-class apportioning and calculating annual impacts. There is no change to the conclusion of the assessment following this change.	E1.3 F02 15	See response to E1.4 F02 12	See Applicant's response to change number E1.4 F02 12.
Table 1.21 and paragraphs 1.5.3.49.	Separating the displacement and collision impact on black-legged kittiwake due to a request from NRW and also altering the combined impact numbers due to amendments to the bio-season definition, age-class apportioning and calculating annual impacts at Wicklow Head SPA. There is no change to the conclusion of the assessment following this change.	E1.3 F02 16	See response to E1.4 F02 12	See Applicant's response to change number E1.4 F02 12.
Table 1.22	Amendments to the collision and displacement impacts on northern gannet from Ailsa Craig SPA due to amendments to the bio-season definition, age-class apportioning and calculating annual impacts. There is no change to the conclusion of the assessment following this change. Amending displacement impacts on common guillemot due to amendments to age-class apportioning and calculating annual impacts from Ailsa Craig SPA. There is no change to the conclusion of the assessment following this change.	E1.3 F02 17	See response to E1.4 F02 12	See Applicant's response to change number E1.4 F02 12.
Table 1.24	Separating the displacement and collision impact on black-legged kittiwake due to a request from NRW and also altering the combined impact numbers due to amendments to the bio-season definition, age-class apportioning and calculating	E1.3 F02 19	See response to E1.4 F02 12	See Applicant's response to change number E1.4 F02 12.

Cross reference to where change has been made	Summary of change	Change number	JNCC comment	Applicant's response
	annual impacts at Flamborough and Filey Coast SPA. There is no change to the conclusion of the assessment following this change.			
Table 1.25 and paragraph 1.5.3.65	Separating the displacement and collision impact on black-legged kittiwake due to a request from NRW and also altering the combined impact numbers due to amendments to the bio-season definition, age-class apportioning and calculating annual impacts at North Colonsay and Western Cliffs SPA. There is no change to the conclusion of the assessment following this change. Amending displacement impacts on common guillemot due to amendments to age-class apportioning and calculating annual impacts. There is no change to the conclusion of the assessment following this change.	E1.3 F02 20	See response to E1.4 F02 12	See Applicant's response to change number E1.4 F02 12.
Table 1.26 and paragraphs 1.5.3.68 and 1.5.3.71	Removing the incorrect reference to 'collision risk' for Manx shearwater for Rum SPA. Collision risk was screened out (within the HRA Stage 1 Screening (E.1.4 F02), as the annual impact (before apportioning) was 0.0 birds. There is no change to the conclusion of the assessment following this change. Amending the displacement impact on Manx shearwater due to amendments to the bio-season definition, age-class apportioning and calculating annual impacts. There is no change to the conclusion of the assessment following this change.	E1.3 F02 21	See response to E1.4 F02 12	See Applicant's response to change number E1.4 F02 12.
Table 1.27 and paragraph 1.5.3.73	Separating the displacement and collision impact on black-legged kittiwake due to a request from NRW and altering the combined impact numbers due to amendments to the bio-season definition, age-class apportioning and calculating annual impacts at Fowlsheugh SPA. There is no change to the conclusion of the assessment following this change.	E1.3 F02 22	See response to E1.4 F02 12	See Applicant's response to change number E1.4 F02 12.
Table 1.28 and paragraph 1.5.3.77	Amending displacement impacts on razorbill and common guillemot due to amendments to age-class apportioning and calculating annual impacts from Mingulay and Berneray SPA. There is no change to the conclusion of the assessment following this change.	E1.3 F02 23	See response to E1.4 F02 12	See Applicant's response to change number E1.4 F02 12.
Table 1.29 and paragraph 1.5.3.81	Amending displacement impacts on common guillemot due to amendments to age-class apportioning and calculating annual impacts from Canna and Sanday SPA. There is no change to the conclusion of the assessment following this change.	E1.3 F02 24	See response to E1.4 F02 12	See Applicant's response to change number E1.4 F02 12.
Table 1.30 and paragraph 1.5.3.85	Amending the collision impact on great black-backed gull due to amendments to the bio-season definition, age-class apportioning and calculating annual impacts from Isles of Scilly SPA. There is no change to the conclusion of the assessment following this change.	E1.3 F02 25	See response to E1.4 F02 12	See Applicant's response to change number E1.4 F02 12.
Table 1.31 and Table 1.32	Separating the displacement and collision impact on black-legged kittiwake due to a request from NRW and also altering the combined impact numbers due to amendments to the bio-season definition, age-class apportioning and calculating annual impacts at Buchan Ness to Collieston SPA (Table 1.31) and Troup, Pennan and Lion's Heads SPA (Table 1.32). There is no change to the conclusion of the assessment following this change.	E1.3 F02 26	See response to E1.4 F02 12	See Applicant's response to change number E1.4 F02 12.
Table 1.33 and paragraph 1.5.3.97-99	Amending displacement impacts on razorbill due to amendments to age-class apportioning and calculating annual impacts from Shiant Isles SPA. There is no change to the conclusion of the assessment following this change. Inclusion of common guillemot due to amendments to age-class apportioning and calculating annual impacts.	E1.3 F02 27	See response to E1.4 F02 12	See Applicant's response to change number E1.4 F02 12.
Table 1.34 and paragraphs 1.5.3.100-103	Inclusion of Skelligs SPA due to amendments to the bio-season definition, age-class apportioning and calculating annual impacts for northern gannet.	E1.3 F02 28	See response to E1.4 F02 12	See Applicant's response to change number E1.4 F02 12.

Cross reference to where change has been made	Summary of change	Change number	JNCC comment	Applicant's response
Table 1.35	Separating the displacement and collision impact on black-legged kittiwake due to a request from NRW and also altering the combined impact numbers due to amendments to the bio-season definition, age-class apportioning and calculating annual impacts at East Caithness Cliffs SPA. There is no change to the conclusion of the assessment following this change.	E1.3 F02 29	See response to E1.4 F02 12	See Applicant's response to change number E1.4 F02 12.
Table 1.36, paragraph 1.5.3.109	Amending displacement impacts on common guillemot due to amendments to age-class apportioning and calculating annual impacts from Handa SPA. There is no change to the conclusion of the assessment following this change.	E1.3 F02 31	See response to E1.4 F02 12	See Applicant's response to change number E1.4 F02 12.
Table 1.37 and paragraph 1.5.3.113	Amending displacement impacts on common guillemot due to amendments to age-class apportioning and calculating annual impacts from St Kilda SPA. There is no change to the conclusion of the assessment following this change. Amendments to the collision and displacement impacts on northern gannet are due to amendments to the bio-season definition, age-class apportioning, and annual impact calculations. There is no change to the conclusion of the assessment following this change.	E1.3 F02 33	See response to E1.4 F02 12	See Applicant's response to change number E1.4 F02 12.
Table 1.38 and paragraph 1.5.3.117	Separating the displacement and collision impact on black-legged kittiwake due to a request from NRW and altering the combined impact numbers due to amendments to the bio-season definition, age-class apportioning and calculating annual impacts at Cape Wrath SPA. There is no change to the conclusion of the assessment following this change. Amending displacement impacts on common guillemot due to amendments to age-class apportioning and calculating annual impacts. There is no change to the conclusion of the assessment following this change.	E1.3 F02 35	See response to E1.4 F02 12	See Applicant's response to change number E1.4 F02 12.
Table 1.39 and paragraph 1.5.3.121	Amending displacement impacts on common guillemot due to amendments to age-class apportioning and calculating annual impacts from Flannan Isles SPA. There is no change to the conclusion of the assessment following this change.	E1.3 F02 36	See response to E1.4 F02 12	See Applicant's response to change number E1.4 F02 12.
Table 1.40 and paragraph 1.5.3.125	Separating the displacement and collision impact on black-legged kittiwake due to a request from NRW and altering the combined impact numbers due to amendments to the bio-season definition, age-class apportioning and calculating annual impacts at North Caithness Cliffs SPA. There is no change to the conclusion of the assessment following this change.	E1.3 F02 37	See response to E1.4 F02 12	See Applicant's response to change number E1.4 F02 12.
Table 1.41 and paragraph 1.5.3.129	Amending displacement impacts on common guillemot due to amendments to age-class apportioning and calculating annual impacts from Sule Skerry and Sule Stack SPA. There is no change to the conclusion of the assessment following this change.	E1.3 F02 38	See response to E1.4 F02 12	See Applicant's response to change number E1.4 F02 12.
Table 1.42 and paragraph 1.5.3.133	Amending displacement impacts on common guillemot due to amendments to age-class apportioning and calculating annual impacts from North Rona and Sula Sgeir SPA. There is no change to the conclusion of the assessment following this change.	E1.3 F02 39	See response to E1.4 F02 12	See Applicant's response to change number E1.4 F02 12.
Table 1.43	Separating the displacement and collision impact on black-legged kittiwake due to a request from NRW and altering the combined impact numbers due to amendments to the bio-season definition, age-class apportioning and calculating annual impacts at West Westray SPA. There is no change to the conclusion of the assessment following this change.	E1.3 F02 40	See response to E1.4 F02 12	See Applicant's response to change number E1.4 F02 12.
Table 1.44	Following amendments to the bioseaon, age-class apportioning the impact from the Mona Offshore Wind Project has been changed from 0.06 birds to 0.09 for the species-specific avoidance rate and from, 0.4 to 0.64 for the species-group avoidance rate at Isles of Scilly SPA. This in turn changes the total predicted mortalities and increase in baseline mortality (also changed in paragraph 1.5.4.4).	E1.3 F02 42	See response to E1.4 F02 12	See Applicant's response to change number E1.4 F02 12.

Cross reference to where change has been made	Summary of change	Change number	JNCC comment	Applicant's response
Tables 1.45 to 1.47	Following the recalculation of the predicted impacts on black-legged kittiwake for Lambay Island SPA, Irelands Eye SPA and Howth Head Coast SPA, the three SPAs needed to be considered within the in-combination assessments (Section 1.5.4). Following the presentation of the in-combination assessment, all of the impacts were predicted to be <1% and, therefore, not taken through to Stage 2 (Section 1.6). There is no change to the conclusion of the assessment following these changes.	E1.3 F02 43	See response to E1.4 F02 12	See Applicant's response to change number E1.4 F02 12.
Paragraph 1.5.5.1	Updated the number of SPAs included in the integrity test: Step 1 from 32 to 35.	E1.3 F02 44	See response to E1.4 F02 12	See Applicant's response to change number E1.4 F02 12.
Paragraphs 1.6.4.22 to 1.6.4.26 and Table 1.68	Amending the PVA outputs for great black-backed gull from the Isles of Scilly SPA due to changes in impacts - see change numbers E1.3 F02 24 and E1.3 F02 42. There is no change to the conclusion of the assessment following these changes. This amendment removed the need for two paragraphs. Therefore, paragraph 1.6.4.25 of HRA Stage 2 Information to Support an Appropriate Assessment Part Three: Special Protection Areas and Ramsar sites Assessments (APP-033) has been removed.	E1.3 F02 45	See response to E1.4 F02 12	See Applicant's response to change number E1.4 F02 12.
Table 1.70	Table 1.70 has been amended in multiple ways due to the changes identified above. Please see above for points relating to each specific SPA. Scientific names have been removed from Table 1.70 due to having already been presented within the document once.	E1.3 F02 46	See response to E1.4 F02 12	See Applicant's response to change number E1.4 F02 12.
Appendix A	Due to the in-combination impacts on great black-backed gull from Isles of Scilly SPA, the input parameters and outputs of the PVA have been updated in Appendix A.	E1.3 F02 47	See response to E1.4 F02 12	See Applicant's response to change number E1.4 F02 12.

2.1.7 HRA Integrity Matrices

Table 2.7: Schedule of changes to HRA Integrity Matrices (E.5 F02 and REP2-014).

Cross reference to where change has been made	Summary of change	Change number	JNCC comment	Applicant's response
Table 1.1	Inclusion of three additional SPAs, their relevant qualifying features and the impacts considered, specifically Morecambe Bay and Duddon Estuary SPA, Wicklow Head SPA and Skelligs SPA. This was due to amendments to the bio-season definition, age-class apportioning, and annual impact calculations. Inclusion of lesser black-backed gull and black-legged kittiwake for Skomer, Skokholm and the Seas off Pembrokeshire/Sgomer, Sgogwm a Moroedd Penfro SPA following recalculations of impacts. This also amended the impacts considered. Correction of the relevant qualifying feature of Canna and Sanday SPA from black-legged kittiwake to common guillemot. This also amended the impacts considered. Inclusion of common guillemot as a relevant qualifying feature of Shiant Isles SPA. Removal of construction/decommissioning phase from Skomer, Skokholm and the Seas off Pembrokeshire/Sgomer, Sgogwm a Moroedd Penfro SPA and Ireland's Eye SPA, as previously screened out. Correction that great black-backed gull are considered in the non-breeding season only for the Isles of Scilly SPA. There is no change to the conclusion of the assessment following these changes.	E.5 F02 1	Noted See response to E1.4 F02 12	See Applicant's response to change number E1.4 F02 12.
Bullet a under table 1.30	Amending the collision impacts on lesser black-backed gull from Ribble and Alt Estuaries SPA and Ramsar site due to amendments to the bio-season definition, age-class apportioning and calculating annual impacts. There is no change to the conclusion of the assessment following this change.	E.5 F02 2	See response to E1.4 F02 12	See Applicant's response to change number E1.4 F02 12.
Table 1.31 and bullets a and b below	Removing the incorrect reference to 'collision risk' for Manx shearwater. Collision risk was screened out (within the HRA Stage 1 Screening (E.1.4 F02), as the annual impact (before apportioning) was 0.0 birds. There is no change to the conclusion of the assessment following this change. Amending the displacement impact on Manx shearwater due to amendments to the bio-season definition, age-class apportioning and calculating annual impacts. There is no change to the conclusion of the assessment following this change.	E.5 F02 3	See response to E1.4 F02 12	See Applicant's response to change number E1.4 F02 12.
Table 1.32 and bullets a and b below	Inclusion of Morecambe Bay and Duddon Estuary SPA following amendments to the bio-season definition, age-class apportioning and calculating annual impacts for lesser black-backed gull.	E.5 F02 4	See response to E1.4 F02 12	See Applicant's response to change number E1.4 F02 12.
Table 1.33 and bullet a below	Amending the collision impacts on lesser black-backed gull from Bowland Fells SPA due to amendments to the bio-season definition, age-class apportioning and calculating annual impacts. There is no change to the conclusion of the assessment following this change.	E.5 F02 5	See response to E1.4 F02 12	See Applicant's response to change number E1.4 F02 12.
Table 1.34 and bullet a and b below	Removing the incorrect reference to 'collision risk' for Manx shearwater from Glannau Aberdaron ac Ynys Enlli/Aberdaron Coast and Bardsey Island SPA. Collision risk was screened out (within the HRA Stage 1 Screening (E.1.4 F02), as the annual impact (before apportioning) was 0.0 birds. There is no change to the conclusion of the assessment following this change. Amending the displacement impact on Manx shearwater due to amendments to the bio-season definition, age-class apportioning and calculating annual impacts. There is no change to the conclusion of the assessment following this change.	E.5 F02 6	See response to E1.4 F02 12	See Applicant's response to change number E1.4 F02 12.
Table 1.35, Table 1.36 and 1.37 and bullet a, b and c below	Separating the displacement and collision impact on black-legged kittiwake from Lambay Island SPA (Table 1.35), Howth Head Coast SPA (Table 1.36) and Ireland's Eye SPA (Table 1.37) due to a request from NRW and also altering the combined impact numbers due to amendments to the bio-season definition, age-class apportioning and calculating annual impacts. Due to these changes, the site is taken through an in-combination assessment (section 1.5.4 of HRA Stage 2). The in-combination assessment was undertaken for this site, and the text amended for bullet c.	E.5 F02 7	See response to E1.4 F02 12	See Applicant's response to change number E1.4 F02 12.

Cross reference to where change has been made	Summary of change	Change number	JNCC comment	Applicant's response
Table 1.38 and bullets a and b below	Removing the incorrect reference to 'collision risk' for Manx shearwater from Copeland Islands SPA. Collision risk was screened out (within the HRA Stage 1 Screening (E.1.4 F02), as the annual impact (before apportioning) was 0.0 birds. There is no change to the conclusion of the assessment following this change. Amending the displacement impact on Manx shearwater due to amendments to the bio-season definition, age-class apportioning and calculating annual impacts. There is no change to the conclusion of the assessment following this change.	E.5 F02 8	See response to E1.4 F02 12	See Applicant's response to change number E1.4 F02 12.
Table 1.39 and bullets a and b below	Separating the displacement and collision impact on black-legged kittiwake from Rathlin Island SPA due to a request from NRW and also altering the combined impact numbers due to amendments to the bio-season definition, age-class apportioning and calculating annual impacts. There is no change to the conclusion of the assessment following this change. Amending displacement impacts on razorbill and common guillemot due to amendments to age-class apportioning and calculating annual impacts. There is no change to the conclusion of the assessment following this change.	E.5 F02 9	See response to E1.4 F02 12	See Applicant's response to change number E1.4 F02 12.
Table 1.40 and bullets a and b below.	Amendments to the species considered for Skomer, Skokholm and the Seas off Pembrokeshire/Sgomer, Sgogwm a Moroedd Penfro SPA – see change number E.5 F02 1. Amendments to the impacts of all species considered due to amendments to the bio-season definition, age-class apportioning and annual impact calculations. There is no change to the conclusion of the assessment following this change.	E.5 F02 10	See response to E1.4 F02 12	See Applicant's response to change number E1.4 F02 12.
Bullet b under Table 1.41	Amendments to the collision and displacement impacts on northern gannet from Grassholm SPA due to amendments to the bio-season definition, age-class apportioning and calculating annual impacts. There is no change to the conclusion of the assessment following this change.	E.5 F02 11	See response to E1.4 F02 12	See Applicant's response to change number E1.4 F02 12.
Table 1.42 and bullet a, b and c below.	Inclusion of Wicklow Head SPA following amendments to the bio-season definition, age-class apportioning and calculating annual impacts for black-legged kittiwake.	E.5 F02 12	See response to E1.4 F02 12	See Applicant's response to change number E1.4 F02 12.
Bullet a and b under Table 1.43	Amendments to the collision and displacement impacts on northern gannet from Ailsa Craig SPA due to amendments to the bio-season definition, age-class apportioning and calculating annual impacts. There is no change to the conclusion of the assessment following this change. Amending displacement impacts on common guillemot from Ailsa Craig SPA due to amendments to age-class apportioning and calculating annual impacts. There is no change to the conclusion of the assessment following this change.	E.5 F02 13	See response to E1.4 F02 12	See Applicant's response to change number E1.4 F02 12.
Bullet a and b under Table 1.45	Separating the displacement and collision impact on black-legged kittiwake from Flamborough and Filey Coast SPA due to a request from NRW and also altering the combined impact numbers due to amendments to the bio-season definition, age-class apportioning and calculating annual impacts. There is no change to the conclusion of the assessment following this change.	E.5 F02 14	See response to E1.4 F02 12	See Applicant's response to change number E1.4 F02 12.
Bullet a and b under Table 1.46	Separating the displacement and collision impact on black-legged kittiwake from North Colonosay and Western Cliffs SPA due to a request from NRW and also altering the combined impact numbers due to amendments to the bio-season definition, age-class apportioning and calculating annual impacts. There is no change to the conclusion of the assessment following this change. Amending displacement impacts on common guillemot due to amendments to age-class apportioning and calculating annual impacts. There is no change to the conclusion of the assessment following this change.	E.5 F02 15	See response to E1.4 F02 12	See Applicant's response to change number E1.4 F02 12.

Cross reference to where change has been made	Summary of change	Change number	JNCC comment	Applicant's response
Table 1.47 and bullet a and b below	Removing the incorrect reference to 'collision risk' for Manx shearwater from Rum SPA. Collision risk was screened out (within the HRA Stage 1 Screening (E.1.4 F02), as the annual impact (before apportioning) was 0.0 birds. There is no change to the conclusion of the assessment following this change. Amending the displacement impact on Manx shearwater due to amendments to the bio-season definition, age-class apportioning and calculating annual impacts. There is no change to the conclusion of the assessment following this change.	E.5 F02 16	See response to E1.4 F02 12	See Applicant's response to change number E1.4 F02 12.
Bullet a and b under Table 1.48	Separating the displacement and collision impact on black-legged kittiwake from Fowlsheugh SPA due to a request from NRW and altering the combined impact numbers due to amendments to the bio-season definition, age-class apportioning and calculating annual impacts. There is no change to the conclusion of the assessment following this change.	E.5 F02 17	See response to E1.4 F02 12	See Applicant's response to change number E1.4 F02 12.
Bullet a under Table 1.49	Amending displacement impacts on razorbill and common guillemot from Mingulay and Berneray SPA due to amendments to age-class apportioning and calculating annual impacts. There is no change to the conclusion of the assessment following this change.	E.5 F02 18	See response to E1.4 F02 12	See Applicant's response to change number E1.4 F02 12.
Table 1.50 and bullets a and b below	Corrected distance between the Isles of Silly SPA and the Mona Array Area and Mona Offshore Cable Corridor. Amending the collision impact on great black-backed gull due to amendments to the bio-season definition, age-class apportioning and calculating annual impacts. The PVA was also rerun, which led to amendments. There is no change to the conclusion of the assessment following this change.	E.5 F02 19	See response to E1.4 F02 12	See Applicant's response to change number E1.4 F02 12.
Table 1.51 and bullet a and b below	Correcting the qualifying feature from black-legged kittiwake to common guillemot at Canna and Sanday SPA changed the impacts considered and the predicted numbers. There is no change to the conclusion of the assessment following this change.	E.5 F02 20	See response to E1.4 F02 12	See Applicant's response to change number E1.4 F02 12.
Bullet b below Table 1.52	Separating the displacement and collision impact on black-legged kittiwake from Buchan Ness and Collieston SPA due to a request from NRW and also altering the combined impact numbers due to amendments to the bio-season definition, age-class apportioning and calculating annual impacts. There is no change to the conclusion of the assessment following this change.	E.5 F02 21	See response to E1.4 F02 12	See Applicant's response to change number E1.4 F02 12.
Bullet b below Table 1.53	Separating the displacement and collision impact on black-legged kittiwake from Troup, Pennan and Lions Heads SPA due to a request from NRW and also altering the combined impact numbers due to amendments to the bio-season definition, age-class apportioning and calculating annual impacts. There is no change to the conclusion of the assessment following this change.	E.5 F02 22	See response to E1.4 F02 12	See Applicant's response to change number E1.4 F02 12.
Table 1.54 and bullets a and b below	Amending displacement impacts on razorbill from Shiant Isles SPA due to amendments to age-class apportioning and calculating annual impacts. There is no change to the conclusion of the assessment following this change. Inclusion of common guillemot due to amendments to age-class apportioning and calculating annual impacts.	E.5 F02 23	See response to E1.4 F02 12	See Applicant's response to change number E1.4 F02 12.
Table 1.55 and bullets a, b and c below	Inclusion of Skelligs SPA due to amendments to the bio-season definition, age-class apportioning and calculating annual impacts for northern gannet.	E.5 F02 24	See response to E1.4 F02 12	See Applicant's response to change number E1.4 F02 12.
Bullet a and b below table 1.56	Separating the displacement and collision impact on black-legged kittiwake from East Caithness Cliffs SPA due to a request from NRW and altering the combined impact numbers due to amendments to the bio-season definition, age-class apportioning and calculating annual impacts. There is no change to the conclusion of the assessment following this change.	E.5 F02 25	See response to E1.4 F02 12	See Applicant's response to change number E1.4 F02 12.
Bullet a below Table 1.57	Amending displacement impacts on common guillemot from Handa SPA due to amendments to age-class apportioning and calculating annual impacts. There is no change to the conclusion of the assessment following this change.	E.5 F02 26	See response to E1.4 F02 12	See Applicant's response to change number E1.4 F02 12.

Cross reference to where change has been made	Summary of change	Change number	JNCC comment	Applicant's response
Bullet a and b below Table 1.58	Amending displacement impacts on common guillemot from St Kilda SPA due to amendments to age-class apportioning and calculating annual impacts. There is no change to the conclusion of the assessment following this change. Amendments to the collision and displacement impacts on northern gannet from St Kilda SPA due to amendments to the bio-season definition, age-class apportioning and calculating annual impacts. There is no change to the conclusion of the assessment following this change.	E.5 F02 27	See response to E1.4 F02 12	See Applicant's response to change number E1.4 F02 12.
Bullet a and c below Table 1.59	Separating the displacement and collision impact on black-legged kittiwake from Cape Wrath SPA due to a request from NRW and altering the combined impact numbers due to amendments to the bio-season definition, age-class apportioning and calculating annual impacts. There is no change to the conclusion of the assessment following this change. Amending displacement impacts on common guillemot from Cape Wrath SPA due to amendments to age-class apportioning and calculating annual impacts. There is no change to the conclusion of the assessment following this change.	E.5 F02 28	See response to E1.4 F02 12	See Applicant's response to change number E1.4 F02 12.
Bullet a below Table 1.60	Amending displacement impacts on common guillemot from Flannan Isles SPA due to amendments to age-class apportioning and calculating annual impacts. There is no change to the conclusion of the assessment following this change.	E.5 F02 29	See response to E1.4 F02 12	See Applicant's response to change number E1.4 F02 12.
Bullet a and b below Table 1.61	Separating the displacement and collision impact on black-legged kittiwake from North Caithness Cliffs SPA due to a request from NRW and altering the combined impact numbers due to amendments to the bio-season definition, age-class apportioning and calculating annual impacts. There is no change to the conclusion of the assessment following this change.	E.5 F02 30	See response to E1.4 F02 12	See Applicant's response to change number E1.4 F02 12.
Bullet a Table 1.62	Amending displacement impacts on common guillemot from Sule Skerry and Sule Stack SPA due to amendments to age-class apportioning and calculating annual impacts. There is no change to the conclusion of the assessment following this change.	E.5 F02 31	See response to E1.4 F02 12	See Applicant's response to change number E1.4 F02 12.
Bullet a Table 1.63	Amending displacement impacts on common guillemot from North Rona and Sula Sgeir SPA due to amendments to age-class apportioning and calculating annual impacts. There is no change to the conclusion of the assessment following this change.	E.5 F02 32	See response to E1.4 F02 12	See Applicant's response to change number E1.4 F02 12.
Bullet a and b below Table 1.64	Separating the displacement and collision impact on black-legged kittiwake from West Westray SPA due to a request from NRW and altering the combined impact numbers due to amendments to the bio-season definition, age-class apportioning and calculating annual impacts. There is no change to the conclusion of the assessment following this change.	E.5 F02 33	See response to E1.4 F02 12	See Applicant's response to change number E1.4 F02 12.

2.2 Appendix: Response to change number F6.5.5 F02 13

Table 2.8: The Applicant's response to the JNCC's detailed comments for change number F6.5.5 F02 13.

Planning Inspectorate Ref. No.	JNCC Written Submission	Applicant's response
REP3-085.1	For ease of reading, we insert JNCC's response to Volume 6, Annex 5.5: Offshore ornithology apportioning technical report, Cross reference to where change has been made Paragraph 1.3.5.1 and 1.3.5.2, Change number F6.5.5 F02 13, below.	The Applicant welcomes the JNCC's comment on change number F6.5.5 F02 13 and welcomes the statement within the JNCC's last paragraph noting that this calculation "would not alter the conclusions regarding levels of significance of impact from the project alone in this instance".
REP3-085.2	We thank the Applicant for the clarification. However, there appears to be some irregularity in the description of the approach to apportioning impacts to colonies in the non-breeding season.	The Applicant met with the JNCC and NRW on 29 October to discuss outstanding matters, including the Applicants approach to apportioning. The Applicant has submitted an Apportioning Clarification Note (S_D4_10) at Deadline 4 that sets out the Applicant's approach and the statutory nature conservation bodies (SNCBs) advised approaches and how the Applicant has considered the SNCBs advice in using the site-specific survey data for age-class apportioning throughout the year for the Mona Offshore Wind Project alone assessment. The Applicant acknowledges that the Applicant's approach, when compared to the SNCBs advised approach, is more precautionary within the alone assessment during the non-breeding season and generates the same predicted impacts for the in-combination assessments. As the impacts presented are the same for the two approaches during the in-combination assessments and more precautionary for the Mona Offshore Wind Project alone assessment, therefore the Application does not intend to amend any of the submitted documents in regard to this point.
REP3-085.3	In the Applicant's response to Relevant Reps (RR-033.25, PDA-008) it is stated that the contribution of adult birds from an individual designated site to the relevant Biologically Defined Minimum Population Scale (BDMPS) population for each species/season combination is divided by the total BDMPS population. This read as though it has been calculated by dividing the number of adult birds from a colony by the number of all birds within the BDMPS. We agree with the Applicant's approach as we understood it in our comments of responses to Relevant Reps (RR-033.26, REP2-097). Note the Applicant's response to Relevant Reps RR-033.26 was actually answered in RR-033.25.	
REP3-085.4	However, here (REP1-066.54, REP2-081) the Applicant states that it has been calculated by dividing the number of adult birds from a colony by the number of adult birds within the BDMPS.	
REP3-085.5	We reiterate that our approach to apportioning impacts to colonies in the non-breeding season is undertaken based on the proportion of the SPA adult birds across the BDMPS total of birds of all ages for each relevant non-breeding BDMPS season using the information in the tables in Appendix A of Furness (2015).	

Planning Inspectorate Ref. No.	JNCC Written Submission	Applicant's response
REP3-085.6	However, we note that the Applicant's approach of calculating the proportion of adults at the colony as a proportion of the total adults in the BDMPS does mean that a higher apportionment value for a designated site is calculated, which can be considered precautionary.	
REP3-085.7	Given the very small predicted impacts from the Mona project alone, we note that if the standard advised approach to age classes and apportioning to designated sites in the non breeding season was used instead of the Applicant's approach it would not alter the conclusions regarding levels of significance of impact from the project alone in this instance. However, for other projects with larger predicted impacts, taking the Applicant's potentially overly precautionary approach may result in different conclusions. Therefore, we would not advise the Applicant's approach is followed for other projects and maintain that our preferred approach is to follow the standard approach taken by other projects.	