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

Submission for Examination

Deadline 5

3 December 2024

Joint Nature Conservation Committee (JNCC):

Offshore ornithology supporting information in line with Statutory Nature Conservation Body advice F02

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Overall comments

JNCC notes that the Applicant maintains an approach not recommended by Statutory Nature Conservation Bodies (SNCBs) (stable-age structure from Furness (2015)) within a document entitled “Offshore ornithology supporting information in line with SNCB advice”. We have previously advised the range of displacement and mortality rates that should be used for black-legged kittiwake and that stable age structures should not be used to age individuals. It is therefore disappointing that an impact assessment integrating this advice has still not been provided. The Applicant’s preferred impact assessment can be presented, but the SNCB advised impact assessment should also be presented alongside.

Alone assessment

We agree with the conclusions of no Adverse Effect on Site Integrity (AEoSI) with regards to the alone assessment for Skomer, Skokholm and the Seas off Pembrokeshire/Sgomer, Sgogwm a Moroedd Penfro Special Protected Area (SPA).

In-combination assessment

We thank the Applicant for inputting the gap-filled project impact values into the in-combination assessment.

Age class apportioning in the breeding season in-combination assessment

That Applicant states that they have sought to present the Environmental Impact Assessment (EIA) and Habitats Regulations Assessment (HRA) requested information in accordance with the SNCBs’ advice alongside the Applicant’s preferred approach. When it comes to the use of age classes, the Applicant has presented an assessment using solely their preferred approach, and without providing an assessment using the SNCBs’ advice. This is despite being advised throughout the pre-application process, the Applicant agreeing to the SNCB approach at Expert Working Group (EWG) 7 on 8 December 2023 (APP-042, D.8.1, Item no. 5), and JNCC reiterating this advice through written feedback on 24 October 2024 following a meeting with the Applicant on 14 October 2024 (REP4-030, Table 1-1).

The Applicant argues that stable age structures have been used by Natural England and Natural Resources Wales Advisory in advice regarding demographic rates, EIA scale mortality rates and reference populations (REP4-030, paragraph 1.3.4.4). However, the prior use of stable-age structures by SNCBs has been in relation to large scale reference populations, rather than in relation to the number of adult mortalities attributed to much smaller individual offshore wind farm projects. Although these projects are dispersed over a

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large area, the relative number of mortalities associated with projects is small. Therefore, there is no precedent for its use at the scale in question here.

The Applicant has been content to use site-specific data on age classes and otherwise assume that all unidentifiable birds are adults within the alone assessment (REP2-081, Applicant's response to REP1-066.19). It is unclear why the Applicant believes this to not be an acceptable approach in the in-combination assessment.

We have previously advised the Applicant that we do not agree with the use of the stable-age structures for age-class apportioning in the breeding season. The UK Western waters area is vast, incorporating all territorial waters to the west of Cornwall in the south, and Orkney in the north. The ratio of adults to immature birds over such a large area are likely to be highly spatially variable, and there is no basis for the assumption that the ratio is applicable at a small project study area. It is noted by Furness (2015) that "*at sea distribution of seabirds differs between age classes, with youngest birds tending to spend their time in the winter quarters even during summer, breeding adults tending to stay closest to their breeding area, and immature birds probably at sea in areas that have good food supplies, but are away from large colonies. Therefore, it is not clear that any at sea data on proportions of different age classes would provide a secure test of the estimated proportions based on demographic data*". We consider that apportioning according to the stable age structure ratio risks significantly underestimating impacts on adult breeding birds.

Site-specific evidence from multiple offshore wind farms projects included in the in-combination assessment reveals that the proportion of adults are far greater than that suggested by stable age structures. Site-specific age classes for Mona were determined to be 95.36% for kittiwake and 93.58% for northern gannet (REP2-022, Table 1.4). Morgan Generation Assets Offshore Wind Farm DAS revealed 84.11% adult kittiwake and 94.94% adult gannet (APP-057, calculated from Table 1.4). Morecambe Generation Assets Offshore Wind Farm DAS revealed 96% adult kittiwake (APP-071, Table 14) and 74% adult gannet (APP-071, Table 37). Awel Y Mor DAS found 93.3% adult gannet (APP-027, calculated from the breeding season values in Table 16). Erebus DAS found 100% adult kittiwake in the breeding season (Erebus: Offshore Ornithology 11.1 Technical Appendix - Baseline Data, Table 3-16) and 99% adult gannet in the breeding season (Erebus: Offshore Ornithology 11.1 Technical Appendix - Baseline Data, Table 3-6). In comparison, stable age structure age classes for black-legged kittiwake are 53.2% (REP4-030, note a of Table 1-54) and 55.25% for northern gannet (REP4-030, note a of Table 1-19). Therefore, the use of stable age structures has the potential to vastly underestimate the impact to adults, and therefore to SPAs.

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We suggest that where there is site-specific evidence of ages from offshore wind farm projects, these are used within the in-combination assessment, and where these are not available all birds are assumed to be adults.

Kittiwake displacement and mortality rates in-combination assessment

We advise that a range of 30% to 70% displacement rates and 1% to 10% mortality rates are used for black-legged kittiwake. The Applicant has used the JNCC-advised ranges of displacement and mortality rates in estimating potential impact numbers. However, in the subsequent step in the assessment, the Population Viability Analyses has solely the Applicant's own preferred parameters (30% displacement and 3% mortality) in order to determine whether or not AEoSI can be ruled out. We reiterate that, whilst we would not base our consideration of impact solely on the top of the range of potential impacts, the full range of displacement and mortality rates should be used to explore the worst-case scenario.

Razorbill in-combination assessment

The tables showing the in-combination assessment for razorbill don't appear to include impacts in the breeding season. Given that the foraging range for razorbill is 88.7±75.9km (Woodward *et al.*, 2019), we would expect that some of the offshore wind farm projects screened into the in-combination assessment would contribute breeding season impacts to the SPAs within paragraphs 1.5.3.71 to 1.5.3.84.

References

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

Woodward, I., Thaxter, C.B., Owen, E. & Cook, A.S.C.P. (2019) Desk-based revision of seabird foraging ranges used for HRA screening. BTO Report 724 for The Crown Estate.