

MONA OFFSHORE WIND PROJECT

Update on offshore ornithology principal matters

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Image of an offshore wind farm

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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).
Environmental Statement	The document presenting the results of the Environmental Impact Assessment (EIA) process for the Mona Offshore Wind Project.
Landfall	The area in which the offshore export cables make contact with land and the transitional area where the offshore cabling connects to the onshore cabling.
Marine licence	The Marine and Coastal Access Act 2009 requires a marine licence to be obtained for licensable marine activities. Section 149A of the Planning Act 2008 allows an applicant for a DCO to apply for a 'deemed' marine licence as part of the DCO process. In addition, licensable activities within 12nm of the Welsh coast require a separate marine licence from Natural Resource Wales (NRW).
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
AEol	Adverse Effect on Integrity
BDMPS	Biologically Defined Minimum Population Scales
CEA	Cumulative Effects Assessment
DCO	Development Consent Order
EIA	Environmental Impact Assessment
GBBG	Great black-backed gull
HRA	Habitats Regulations Assessment
IPs	Interested Parties
ISAA	Information to support the Appropriate Assessment
JNCC	Joint Nature Conservation Committee
NRW (A)	Natural Resources Wales (Advisory)
NRW	Natural Resources Wales
NSIP	Nationally Significant Infrastructure Project
PVA	Population Viability Analysis
RIES	Report on the Implications for European Sites

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Acronym	Description
SNCB	Statutory Nature Conservation Body
SoCG	Statement of Common Ground
SPA	Special Protection Area
SSSI	Site of Special Scientific Interest
UXO	Unexploded ordnance

Units

Unit	Description
m	Metres
%	Percentage

1 UPDATE ON OFFSHORE ORNITHOLOGY PRINCIPAL MATTERS

1.1 Summary

1.1.1.1 At Deadline 5, the Applicant submitted a Summary of Principal Offshore Ornithological Matters (REP5-072) to assist the Examining Authority by providing a summary of remaining points of disagreement between the Applicant and Statutory Nature Conservation Bodies (SNCBs) and whether the Applicant considers these matters to be resolvable by the end of the Examination.

1.1.1.2 The Applicant notes and welcomes that several matters identified in the Applicant's Summary of Principal Offshore Ornithological Matters (REP5-072) at Deadline 5 are now agreed between the Applicant and Natural Resources Wales (Advisory) (NRW (A)) and the Joint Nature Conservation Committee (JNCC). The updated Statement of Common Ground (SoCG) between the Applicant and the JNCC (S_D1_15 F02) submitted at Deadline 6 confirms that all matters are now 'agreed' or 'not agreed but not material'. This is also the case in the updated SoCG between the Applicant and both NRW (A) – Offshore (S_D1_12 F02) submitted at Deadline 6, except a matter relating to the northern gannet feature of the Grassholm SPA which remains an 'ongoing point of discussion'.

1.1.1.3 This document provides an update on progress toward an agreement with the SNCBs on the principal ornithological matters since Deadline 5. It also sets out details of the final offshore ornithology submissions the Applicant is proposing to submit at Deadline 7. In order to draw the application and examination materials for offshore ornithology together, the Applicant is proposing to undertake a final update to Volume 2 Chapter 5: Offshore Ornithology (REP4-007) and the Habitats Regulations Assessment (HRA) Stage 2 Information to Support an Appropriate Assessment (ISAA) Part Three: Special Protection Areas (SPAs) and Ramsar sites Assessments (REP2-010) to include the relevant examination materials as a series of Annexes. This exercise will also seek to address the remaining outstanding matters between the Applicant and Interested Parties (IPs), where possible. The Applicant intends to submit a final offshore ornithological position paper at Deadline 7 to summarise the information provided and the rationale for the different assessment scenarios considered within the Environmental Statement and ISAA.

1.2 Introduction

1.2.1.1 The Applicant welcomes Natural Resources Wales (Advisory) (NRW (A)) and the Joint Nature Conservation Committee's (JNCC) comments on the Applicant's Examination submissions up to Deadline 4 and is pleased that progress has been made to resolve their concerns.

1.2.1.2 Further engagement with NRW (A) and the JNCC was held between Deadlines 4 and 6 to determine whether the Applicant's examination materials, including those submitted at Deadline 5, had sufficiently addressed their concerns. The Applicant met with the JNCC on 12 December 2024, which included discussion of outstanding offshore ornithology matters. The Applicant also met with NRW (A) on 6 December and 16 December 2024 to discuss offshore matters, including NRW (A)'s concerns with respect to the in-combination assessment for the northern gannet feature of the Grassholm SPA.

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- 1.2.1.3 The updated and additional information provided by the Applicant at Deadline 5 is considered to have resolved the majority of NRW (A)'s and the JNCC's comments made at Deadline 5.
- 1.2.1.4 At Deadline 5, the Applicant submitted a Summary of Principal Offshore Ornithological Matters (REP5-072) to assist the Examining Authority by providing a summary of remaining points of disagreement between the Applicant and SNCBs and whether the Applicant considers these matters to be resolvable by the end of the Examination. For the avoidance of doubt, the Applicant considers that it is capable of reaching a final position of 'agreed' or 'not agreed-not material' on all principal offshore ornithological matters with the SNCBs by the end of the Examination.
- 1.2.1.5 This document provides an update on progress toward an agreement with the SNCBs on the principal offshore ornithological matters and responds to the following NRW (A) and JNCC submissions on offshore ornithology at Deadline 5:
- JNCC Offshore ornithology supporting information in line with Statutory Nature Conservation Body advice (REP5-093)
 - NRW Deadline 5 Submission (REP5-098).
- 1.2.1.6 The Applicant does not consider that these submissions have raised any new offshore ornithology principal matters but rather provide further representations on matters already raised in Examination and which were outlined in the Applicant's Summary of Principal Offshore Ornithological Matters (REP5-072) at Deadline 5. The Applicant's Deadline 5 submissions are considered to have addressed or progressed the majority of these matters. Therefore, the Applicant has focused this document on the principal matters rather than responding line by line to the NRW (A) and JNCC submissions outlined in the paragraph above. The Applicant has, however, provided clarifications in section 1.4 where these have been requested.
- 1.2.1.7 Responses to NRW (A)'s and the JNCC's comments on the RIES and Examining Authority's second written questions (EQ2s) are presented in the following document at Deadline 6:
- Response to NRW Comments on the RIES (S_D6_17)
 - Response to JNCC Comments on the RIES (S_D6_15)
 - Response to NRW ExQ2 Submission (S_D6_19)
 - Response to JNCC ExQ2 Submission (S_D6_14).
- 1.2.1.8 This document also sets out the Applicant's next steps for consolidating the offshore ornithology Examination materials submitted to date and how it proposes to address any outstanding matters between the Applicant and IPs in section 1.3 by Deadline 7.
- 1.2.1.9 The Applicant notes and welcomes that a number of matters identified in the Applicant's Summary of Principal Offshore Ornithological Matters (REP5-072) at Deadline 5 are now agreed between the Applicant and NRW (A) and the JNCC. The updated Statements of Common Ground (SoCG) between the Applicant and the JNCC (S_D1_15 F02) submitted at Deadline 6 confirms that all matters are now 'agreed' or 'not agreed but not material'. This is also the case in the updated SoCG between the Applicant and both NRW (A) – Offshore (S_D1_12 F02) submitted at Deadline 6, except a matter relating to the northern gannet feature of the Grassholm SPA which remains an 'ongoing point of discussion'.
- 1.2.1.10 NRW (A)'s concerns related to the in-combination assessment for the northern gannet feature of the Grassholm SPA is a new concern which was only raised after Deadline 5. This has been addressed by the Applicant at Deadline 6 in a dedicated submission

titled 'Revised Assessment for Northern Gannet at Grassholm SPA' (S_D6_9). This matter is discussed further in section 1.3 below.

1.3 Update on offshore ornithology principal matters

1.3.1.1 The numbering of the following headers reflects the ID numbers assigned to each matter in the Applicant's Summary of Principal Offshore Ornithological Matters (REP5-072) at Deadline 5 (see Table 1.1), where applicable.

Principal matter 4 - Age class proportions during the breeding season within the in-combination assessments

1.3.1.2 NRW (A) and JNCC disagree with the Applicant's approach to stable-age class apportionment during the breeding season for the in-combination assessment and do not recommend that this be used to determine the number of adults within project study areas. NRW (A) and the JNCC advise that site-specific information on age classes should be used where available and where unavailable, all birds should be assumed to be adults (see the JNCC comments on Offshore ornithology supporting information in line with SNCB advice (REP5-093) and NRW - Deadline 5 Submission (REP5-098) paragraph 30).

1.3.1.3 Taking onboard the feedback received, the Applicant submitted further supporting assessments for a subset of designated sites and features requested by the SNCBs, using site-specific information on age classes where available or otherwise assuming all birds are adults (as advised by NRW (A) and the JNCC). This information was included in the Offshore ornithology additional supporting in-combination assessment information in line with SNCB advice (REP5-074) submitted at Deadline 5.

1.3.1.4 In light of this submission, it is understood that the JNCC is able to rule out AEoI for all sites and qualifying features under its jurisdiction from the Mona Offshore Wind Project in-combination with other projects and plans. As such, the Applicant and the JNCC are now agreed on this matter, which is reflected in the updated Initial SoCG between Mona Offshore Wind Project and the JNCC (S_D1_15 F02) (see rows JNCC.OO.14, JNCC.OO.32 and JNCC.OO.33) submitted at Deadline 6. The Applicant anticipates the JNCC also confirming this in its Deadline 6 submissions.

1.3.1.5 The Applicant also understands that NRW (A) is able to rule out AEoI for all sites and qualifying features under its jurisdiction from the Mona Offshore Wind Project in-combination with other projects and plans with the exception of northern gannet at Grassholm SPA (see 'Principal matter 10 below for further information with respect to this). This is reflected in the updated Initial SoCG between Mona Offshore Wind Project and NRW (A) (S_D1_12 F02) submitted at Deadline 6. The Applicant anticipates NRW (A) also confirming this update in its Deadline 6 submissions.

1.3.1.6 The Applicant is proposing to undertake a final update to the HRA Stage 2 ISAA Part Three: SPAs and Ramsar sites Assessments (REP2-010) to repackage the relevant examination materials into a series of Annexes at Deadline 7. This will include an Annex to provide an in-combination assessment using the SNCBs advised approach to age-class proportions in the breeding season for all SPAs considered within the ISAA for the Mona Offshore Wind Project. See section 1.5 for further detail.

Pen y Gogarth / Great Orme's Head SSSI

1.3.1.7 Although NRW (A)'s concern in respect of the Applicant's approach to stable-age class apportionment during the breeding season also applies to the assessment of Pen y

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Gogarth / Great Orme's Head SSSI, NRW (A) has confirmed agreement that the Mona Offshore Wind Project alone and cumulatively with other plans and projects is unlikely to have a significant adverse effect (i.e. not greater than minor adverse) for the guillemot and razorbill features of the Pen y Gogarth / Great Orme's Head SSSI. However, the NRW (A) considers that there is a moderate adverse impact on the kittiwake colony of the SSSI (see NRW - Deadline 5 Submission (REP5-098) paragraph 14).

- 1.3.1.8 NRW (A) has recognised and welcomed the commitment already made to raise turbine draught height to 30m above Mean Sea Level. Therefore, NRW (A) is content that the Applicant has provided proportionate mitigation for kittiwake at this site (see Natural Resources Wales - Deadline 5 Submission (REP5-098) paragraph 12).
- 1.3.1.9 The Applicant maintains that the effect on the kittiwake colony of the Pen y Gogarth / Great Orme's Head SSSI is of minor adverse (not significant in EIA terms) (see Offshore Ornithology Assessment of Pen y Gogarth/Great Orme's Head SSSI REP4-025). However, as NRW (A) has confirmed that the Mona Offshore Wind Project has mitigated the impact as far as required. The Applicant therefore considers that no further updates to the assessment are required and notes this matter is now recorded as 'not agreed – not material' in the updated SoCG between the Applicant and NRW (A) – Offshore ((S_D1_12 F02) (see rows NRW.OO.25 and NRW.OO.28) submitted at Deadline 6.
- 1.3.1.10 The Applicant is proposing to undertake a final update to Volume 2, Chapter 5: Offshore ornithology to append the latest SSSI assessment as an annex at Deadline 7. See section 1.5 for further detail.

Principal matter 5 - Consideration of new information on other projects and plans made available after application.

- 1.3.1.11 NRW (A) and the JNCC requested that the cumulative assessments in Volume 2, Chapter 5: Offshore ornithology (REP4-007) and in-combination assessments within HRA Stage 2 ISAA Part 3 SPAs and Ramsar sites Assessments (REP2-11) should include the application numbers from the Morgan Offshore Wind Project: Generation Assets (hereafter referred to as 'Morgan Generation Assets'), Morecambe Offshore Wind Project: Generation Assets (hereafter referred to as 'Morecambe Generation Assets') and Llŷr floating offshore wind project (see NRW - Deadline 5 Submission (REP5-098) and JNCC Deadline 5 Submission - Report on the Implications for European Sites (REP5-096)).
- 1.3.1.12 The Applicant submitted further supporting in-combination and cumulative assessments at Deadline 5 which include the application numbers from the Morgan Offshore Generation Assets, Morecambe Generation Assets and Llŷr floating offshore wind project. This was included in the Offshore ornithology additional supporting in-combination assessment information in line with SNCB advice (REP5-074) and Offshore Ornithology Additional Supporting Cumulative Assessment Information in line with SNCB Advice (REP5-075) submitted at Deadline 5.
- 1.3.1.13 Both NRW (A) and the JNCC are satisfied with the inclusion of these projects within the relevant CEA and in-combination assessments and this is reflected in the updated SoCGs between the Applicant and both NRW (A) – Offshore (S_D1_12 F02) (see rows NRW.OO.17 and NRW.HRA.34).and the JNCC (S_D1_15 F02) (see rows JNCC.OO.18 and JNCC.OO.29) submitted at Deadline 6.
- 1.3.1.14 The Applicant is proposing to undertake a final update Volume 2 Chapter 5: Offshore Ornithology (REP4-007) and the HRA Stage 2 ISAA Part Three: SPAs and Ramsar

sites Assessments (REP2-010) to repackage the relevant examination materials into a series of Annexes at Deadline 7. These updates will include the application-numbers from the Morgan Generation Assets, Morecambe Generation Assets and Llyr floating offshore wind project within the relevant CEA and in-combination assessments. See section 1.5 for further detail.

Principal matter 6- Consideration of the gap filled historical projects

- 1.3.1.15 NRW (A) requested that the cumulative assessments in Volume 2, Chapter 5: Offshore ornithology (REP4-007) and the in-combination assessment within the HRA Stage 2 Information to Support Appropriate Assessment (ISAA) Part 3 Special Protection Areas and Ramsar sites Assessments (REP2-11) include the gap-filled projects (see NRW - Deadline 5 Submission (REP5-098) paragraph 7 and 18).
- 1.3.1.16 The Applicant highlights that the gap-filled projects were included in the in-combination assessments at Deadline 4 (see Offshore ornithology supporting information in line with SNCB advice (REP4-030) as well as subsequent updates to the CEA and in-combination assessments (see REP5-074 and REP5-075).
- 1.3.1.17 Both NRW (A) and the JNCC are satisfied with the inclusion of these projects within the relevant CEA and in-combination assessments and this is reflected in the updated SoCGs between the Applicant and both NRW (A) – Offshore (S_D1_12 F02) (see rows NRW.OO.20 and NRW.HRA.34).and the JNCC (S_D1_15 F02) (see rows JNCC.OO.21 and JNCC.OO.32) submitted at Deadline 6.
- 1.3.1.18 The Applicant is proposing to undertake a final update of Volume 2 Chapter 5: Offshore Ornithology (REP4-007) and the HRA Stage 2 ISAA Part Three: SPAs and Ramsar sites Assessments (REP2-010) to incorporate the information previously submitted into examination on the gap-filled historical projects within the relevant CEA and in-combination assessments.
- 1.3.1.19 Indicative estimates for a small number of historical offshore wind farms were not initially included in the gap-filling exercise presented within Offshore Ornithology Cumulative Effects Assessment and In-combination Gap-filling Historical Projects Technical Note (REP4-029) as the Applicant understood that the marine licences for these projects were due to expire before the Mona Offshore Wind Project is expected to be commissioned. The Applicant notes that none of the SNCBs have raised any concerns in Examination on the scope of the projects considered in the gap-filling exercise. However, the Ørsted IPs Deadline 5 submission ‘Comments on Deadline 4 Submissions’ (REP5-117) confirmed that the Ørsted IPs believe that Barrow Offshore Wind Farm can continue operating beyond 2026. The Applicant also believes that North Hoyle (which is also a project in the East Irish Sea) is in a similar position with respect to the potential for repowering. In light of the comments received from the Ørsted IPs and for completeness, the Applicant will include indicative gap-fill numbers for both these two projects, where relevant, in the final Volume 2 Chapter 5: Offshore Ornithology (REP4-007) and HRA Stage 2 Information to Support an Appropriate Assessment Part Three: SPAs and Ramsar sites Assessments (REP2-010) at Deadline 7. See section 1.5 for further detail.

Principal matter 7- Differences from the Morgan Generation Assets

- 1.3.1.20 NRW (A) requested that the Mona, Morgan Generation Assets and Morecambe Generation Assets projects undertake cumulative and in-combination assessments covering the same list of projects and assessing the same cumulative / in-combination totals (see NRW - Deadline 5 Submission (REP5-098) paragraph 41).

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- 1.3.1.21 The Applicant set out a summary of the differences in cumulative abundance numbers for the Mona Offshore Wind Project compared to Morgan Generation Assets within the Summary of Principal Offshore Ornithological Matters (REP5-072) submitted at Deadline 5. The differences between the input values do not alter the conclusions of the cumulative or in-combination assessments undertaken for Mona Offshore Wind Project and Morgan Generation Assets. All CEA conclusions are, in Environmental Impact Assessment (EIA) terms, not significant (negligible or minor) for both projects. Similarly, a conclusion of no AEoI in-combination with other plans and projects has been reached for all sites and features considered in the assessments for Mona Offshore Wind Project and Morgan Generation Assets. Thus, any differences in the abundance estimates between the two projects are not considered to materially alter the assessment outcomes. Therefore, the Applicant considers that this matter is closed.
- 1.3.1.22 The Applicant highlights that whilst it has sought to align as far as possible with the Morgan Generation Assets application, the Applicant has no influence over the Morecambe Generation Assets as this application is being brought forward by a different developer.
- 1.3.1.23 The Applicant will provide a summary of the Applicant's position with respect to differences between the input values for the Mona Offshore Wind Project and Morgan Generation Assets in a final offshore ornithological position paper submitted at Deadline 7. See section 1.5 for further detail.

Principal matter 8 - Consideration of the Measures to minimise disturbance to marine mammals and rafting birds from transiting vessels (REP5- 030)

- 1.3.1.24 In light of the Applicant's Deadline 5 submissions, the Applicant, NRW (A) and the JNCC are now agreed that the mitigation measures set out in the Measures to minimise disturbance to marine mammals and rafting birds from transiting vessels (REP5- 030) are appropriate to avoid the risk of significant effects or AEoI and that these measures are appropriately secured. This agreement is reflected in the updated SoCGs between the Applicant and both NRW (A) – Offshore (S_D1_12 F02) and the JNCC (S_D1_15 F02) at Deadline 6. A summary of the agreements is provided below.
- 1.3.1.25 Between the Applicant and both NRW (A) & the JNCC:
- In row NRW.HRA.36 NRW (A) confirms that they agree and in row JNCC.OO.22 JNCC confirms that they agree with the mitigation set out in the Measures to minimise disturbance to marine mammals and rafting birds from transiting vessels (REP5-030) for disturbance on red throated diver (RTD) and common scoter features of Liverpool Bay/Bae Lerpwl SPA.
 - In row NRW.OO.21 NRW (A) have agreed and in row and JNCC.OO.23 JNCC hav agreed that trenchless techniques at the Mona landfall will not be included in the seasonal timing restriction of 1 November to 31 March in the Measures to Minimise Impacts to Marine Mammals and Rafting Birds (REP5-030) on UXO clearance activities and cable installation vessels undertaking active cable installation, but vessel movements will be managed to minimise effects on features of Liverpool Bay Special Protection Area (SPA) via the Measures to Minimise Impacts to Marine Mammals and Rafting Birds (REP5-030).
 - In row NRW.HRA.36 NRW(A) confirm that they agree and in row JNCC.OO.25 JNCC confirm thy agree that the seasonal restriction outlined in the Measures to minimise disturbance to marine mammals and rafting birds from transiting

vessels document (REP5-030) only covers UXO clearance activities and export cable installation vessels undertaking active cable installation in the Liverpool Bay/Bae Lerpwl SPA. All other pre-commencement surveys (e.g. unexploded ordnance surveys) within the Liverpool Bay/Bae Lerpwl SPA would therefore not be subject to a seasonal restriction.

New principal matter 9 – In-combination assessment for northern gannet feature of the Grassholm SPA

- 1.3.1.26 NRW (A) has raised concerns with respect to the most recent in-combination assessment undertaken for northern gannet from Grassholm SPA (presented in Offshore ornithology additional supporting in-combination assessment information in line with SNCB advice (REP5-074)) and the level of precaution included within this. The Applicant and NRW (A) had a meeting on 16 December 2024 to discuss NRW (A)'s concerns and a way forward was agreed.
- 1.3.1.27 In accordance with NRW (A)'s advice (received verbally in the meeting on 16 December 2025 and via email on 17 December 2024), the Applicant has provided a Revised Assessment for northern gannet at Grassholm SPA (S_D6_9) at Deadline 6. The conclusion of this assessment remains that there will be no AEol from the Mona Offshore Wind Project in-combination with other plans or projects. The Applicant is confident that the information provided at Deadline 6 will enable NRW (A) to confirm their position on AEol with respect to this site and feature. The Applicant does not anticipate a requirement for a derogation case (including compensation) and notes that NRW (A) also considers it unlikely that one will be required (see row *NRW.HRA.39 of the SoCG* between Mona Offshore Wind Project and NRW(A) (S_D1_12 F02) submitted at Deadline 6).

1.4 Additional clarifications

Assessment of great black-backed gull

- 1.4.1.1 In their Deadline 5 submission (Deadline 5 Submission (REP5-098) paragraph 8), NRW (A) highlighted that the great black-backed gull (GBBG) cumulative collision assessments presented in Volume 2, Chapter 5: Offshore ornithology (REP4-007) are based on the original advised breeding season reference population, and hence, the largest seasonal Biologically Defined Minimum Population Scales (BDMPS) population of 44,753 individuals. The revised south-west and Channel BDMPS GBBG breeding season reference population is now 13,424 (Natural England, NRW, 2024¹), meaning that now, the largest BDMPS for use in the EIA annual impact assessment is the non-breeding season figure of 17,742 from Furness (2015). NRW (A) requested that the cumulative assessment in Volume 2, Chapter 5: Offshore ornithology (REP4-007) is updated to account for this change to the advised GBBG breeding (13,424) and largest seasonal population (17,742) and includes any PVA undertaken for this starting population.
- 1.4.1.2 The Applicant provided an updated project alone assessment using the revised non-breeding season population of 17,742 from Furness (2015) within the Offshore

¹ Natural England, NRW, 2024, NE and NRW interim advice regarding demographic rates, EIA scale mortality rates and reference populations for use in offshore wind impact assessments. Available within Natural England's Relevant Representation at Morecambe Generation Assets. <https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010121/EN010121-000449-Natural%20England%20RR%20Stitched.pdf>

Ornithology Supporting Information in line with SNCB advice (REP3-059) at Deadline 3. The Applicant is proposing to undertake a final update to Volume 2, Chapter 5: Offshore Ornithology at Deadline 7 to include a revised CEA using the updated population for GBBG. The Applicant is confident that the updated population does not affect the conclusions of the assessment.

Consideration of breeding season impacts in the in-combination assessment for razorbill

- 1.4.1.3 The JNCC queried why the in-combination assessment tables presented in the Offshore ornithology additional supporting in-combination assessment information in line with SNCB advice (REP4-030) for razorbill do not appear to include impacts in the breeding season (see JNCC comments on Offshore ornithology supporting information in line with SNCB advice (REP5-093)).
- 1.4.1.4 The Applicant acknowledges that the breeding season impact was omitted from the in-combination assessment presented in the Offshore ornithology additional supporting in-combination assessment information in line with SNCB advice (REP4-030). However, the Applicant submitted further supporting in-combination and cumulative assessments for Skomer, Skokholm and the Seas off Pembrokeshire/Sgomer SPA which included the breeding season impact. This was presented in the Offshore ornithology additional supporting in-combination assessment information in line with SNCB advice (REP5-074) and Offshore Ornithology Additional Supporting Cumulative Assessment Information in line with SNCB Advice (REP5-075) at Deadline 5.
- 1.4.1.5 The Applicant is proposing to undertake a final update Volume 2 Chapter 5: Offshore Ornithology (REP4-007) and the HRA Stage 2 ISAA Part Three: SPAs and Ramsar sites Assessments (REP2-010) to repackage the relevant examination materials into a series of Annexes at Deadline 7. See section 1.5 for further detail. The breeding season impacts for the three SPAs showing connectivity to the Mona Offshore Wind Project (Skomer, Skokholm and the Seas off Pembrokeshire/Sgomer SPA, Cape Wrath SPA and Handa SPA) will be included in the updated HRA Stage 2 ISAA Part Three: SPAs and Ramsar sites Assessments (REP2-010) submitted at Deadline 7. The Applicant is confident that the inclusion of breeding season impacts will not affect the conclusions of the in-combination assessment for razorbill.

Common guillemot PVAs

- 1.4.1.6 NRW (A) queried Table 1.25 of the Offshore Ornithology Cumulative Effects Assessment and In-combination Gap-filling Historical Projects Technical Note (REP4-028) which suggests that PVAs had been run for cumulative guillemot impacts for scenarios of 30% displacement and 1% mortality (i.e. 284 mortalities), 50% displacement and 1% mortality (i.e. 473 mortalities) and 70% displacement and 10% mortality (i.e. 6,618 mortalities). However, the PVA inputs in Appendix B suggested that the only impact scenarios run have been for 30%, 50% and 70% displacement, all with a 1% mortality (see NRW - Deadline 5 Submission (REP5-098) paragraph 21).
- 1.4.1.7 The Applicant can confirm that the wording in Appendix B stating 70% displacement and 1% mortality for the PVA was a typographical error. The Applicant can confirm that the PVA used 70% displacement and 10% mortality.

1.5 Summary of Applicant's next steps

- 1.5.1.1 The Applicant acknowledges that a high volume of material for offshore ornithology has been submitted into Examination. In order to draw all the application and

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examination material for offshore ornithology together and to address the remaining minor outstanding matters between the Applicant and IPs, the Applicant is proposing to undertake a final update Volume 2 Chapter 5: Offshore Ornithology (REP4-007) and the HRA Stage 2 ISAA Part Three: SPAs and Ramsar sites Assessments (REP2-010) to repackage the relevant examination materials into a series of Annexes, which will be appended to the Environmental Statement chapter and ISAA at Deadline 7.

1.5.1.2 To summarise, the updates to Volume 2 Chapter 5: Offshore Ornithology (REP4-007) will include:

- To address any remaining minor errata
- To include indicative gap-fill estimates for historic offshore wind projects from Offshore Ornithology Cumulative Effects Assessment and In-combination Gap-filling Historical Projects Technical Note (REP4-029) in the cumulative effects assessment (CEA) and estimates for the Barrow and North Hoyle offshore wind projects
- To include the Morgan Generation Assts, Morecambe Generation Assets and Llyr floating offshore wind application numbers in the CEA
- To provide a revised cumulative assessment using the revised non-breeding season population for of 17,742 from Furness (2015) for GBBG as per the project alone assessment presented in within the Offshore Ornithology Supporting Information in line with SNCB advice (REP3-059) at Deadline 3
- Inclusion of an annex to present the Offshore Ornithology Assessment of Pen y Gogarth & Great Orme's Head SSSI (REP4-025).

1.5.1.3 To summarise, the updates to the HRA Stage 2 ISAA Part Three: SPAs and Ramsar sites Assessments (REP2-010) will include:

- To address any remaining minor errata
- Inclusion of an annex to the ISAA to provide a consistent SNCB (i.e. NRW (A) and the JNCC) advised assessment alongside the Applicant's identified assessment scenario for all the relevant designated sites for consideration by the Secretary of State
- To include indicative gap-fill estimates for historic offshore wind projects from Offshore Ornithology Cumulative Effects Assessment and In-combination Gap-filling Historical Projects Technical Note (REP4-029) into the in-combination assessment and estimates for the Barrow and North Hoyle offshore wind projects
- Inclusion of an annex to present an assessment for the Isle of Man proposed Ramsar sites to allow the Secretary of State to complete an Appropriate Assessment on these sites if they determine one is required (see the Applicant's Assessment of the Isle of Man proposed Ramsar sites submitted at Deadline 6 (S_D6_12))
- Inclusion of breeding season impacts for razorbill for the three SPAs showing connectivity to the Mona Offshore Wind Project (Skomer, Skokholm and the Seas off Pembrokeshire/Sgomer SPA, Cape Wrath SPA and Handa SPA). These will not affect the conclusions of the in-combination assessment.

1.5.1.4 This exercise is intended to address the remaining outstanding offshore ornithological principal matters between the Applicant and the IPs within the final EIA and HRA documents, where appropriate. In doing so, the Applicant will ensure that the final Environmental Statement chapter and ISAA include signposting to the associated

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annexes so it is clear where other relevant assessment information and the associated conclusions can be found.

1.5.1.5

Any updates to the CEA and in-combination assessments will be minor and therefore, the Applicant does not consider that they will alter the conclusions drawn in the EIA and HRA materials or the conclusions reached by the SNCBs. Nonetheless, to enable the relevant IPs to have regard to this information within their Closing Statements, the relevant information will be shared with these IPs (for information purposes only) ahead of Deadline 7.