Partners in UK offshore wind

MONA OFFSHORE WIND PROJECT

Further Context to the RPSB Cymru Statement of Common Ground

Deadline: 6

Application Reference: EN010137

Document Reference: S_D6_11

Document Number: MOCNS-J3303-RPS-10485

20 December 2024

F01

Image of an offshore wind farm

www.morganandmona.com/en

Document status

Version	Purpose of document	Authored by	Reviewed by	Approved by	Review date
F01	Submission at D6	RPS	Mona Offshore Wind Ltd	Mona Offshore Wind Ltd	20 Dec 2024

Prepared by:

RPS

Prepared for:

Mona Offshore Wind Ltd.

Contents

Tables

Glossary

Term	Meaning
Applicant	Mona Offshore Wind Limited.
Collision risk	Risk of a bird lethally colliding with a wind turbine within a wind farm.
Collision risk model (CRM)	A model that calculates collision risk for a species within a wind farm based on a set of wind farm and bird species specific parameters. Collision risk models can be run deterministically or stochastically.
Evidence Plan Process	The Evidence Plan process is a mechanism to agree upfront what information the Applicant needs to supply to the Planning Inspectorate as part of the Development Consent Order (DCO) applications for the Mona Offshore Wind Project.
Expert Working Group (EWG)	Expert working groups set up with relevant stakeholders as part of the Evidence Plan process.
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 Wind Project	The Mona Offshore Wind Project is comprised of both the generation assets, offshore and onshore transmission assets, and associated activities.
Population Viability Analysis	The process of determining the probability that a population will persist over a specified time period.

Acronyms

Acronym	Description
AEoI	Adverse Effect on Integrity
CRM	Collision Risk Modelling
DAS	Digital Aerial Survey
ECOWind	Ecological Consequences of Offshore Wind
EIA	Environmental Impact Assessment
EWG	Expert Working Group
HPAI	Highly Pathogenic Avian Influenza
JNCC	Joint Nature Conservation Committee
NAF	Nocturnal Activity Factor
NRW (A)	Natural Resources Wales (Advisory)
PVA	Population Viability Analysis
RSPB	Royal Society for the Protection of Birds
SNCB	Statutory Nature Conservation Body
SoCG	Statement of Common Ground
SPA	Special Protection Area

Units

Unit	Description
km	Kilometres
km^2	Kilometres squared

1 FURTHER CONTEXT TO THE RSPB CYMRU STATEMENT OF COMMON GROUND

1.1 Summary

1.1.1.1 This note is intended to provide the Examining Authority with further context on the outstanding matters outlined in the updated Initial Statement of Common Ground (SoCG) between Mona Offshore Wind Project and the Royal Society for the Protection of Birds (RSPB) Cymru (REP5-052) submitted at Deadline 5 that were not considered to have been addressed by the Applicant's Deadline 5 submissions. The principal matters not agreed with the RSPB Cymru for the Mona Offshore Wind Project are:

- Digital Aerial Surveys and baseline characterisation for Manx Shearwater
- Application of Population Viability Analysis (PVA)
- Consideration of indirect ecosystem impacts
- Consideration of Highly Pathogenic Avian Influenza (HPAI)
- Collision risk methodology for Manx shearwater

1.1.1.2 The Applicant has set out its position on each of these matters, the further progress expected within the examination and the anticipated status of each of these matters in the final SoCG with the RSPB Cymru at Deadline 7.

1.2 Introduction

1.2.1.1 The Applicant welcomes the engagement with the RSPB Cymru throughout the pre-application and examination phase of the Mona Offshore Wind Project. While engagement has been productive, it has been limited during examination due to resource constraints within RSPB Cymru. As such, the focus of engagement has been on matters that the RSPB considers to be principal matters. This note focuses on those principal matters that are not yet agreed. This note is intended to assist the Examining Authority in understanding where there remain to be points of disagreement between the Applicant and RSPB Cymru and whether the Applicant considers these matters to be resolvable by the end of the Examination and, if not, whether they are considered material (i.e. result in a materially different outcome to the assessment conclusions) or not-material (i.e. do not result in a material impact on the assessment or conclusions). As such, the Applicant has assigned a status to each matter included in this note based on its discussions with the RSPB Cyrmu to date and how it anticipates these to be reflected in the final iteration of the Statement of Common Ground (SoCG) at Deadline 7. The Applicant welcomes feedback on the examination submissions and remains open to further discussions.

1.2.2 Purpose of this document

1.2.2.1 The Applicant has provided this note to summarise the offshore ornithology matters that are not yet agreed with RSPB Cymru at Deadline 6, including those which it considers remain 'in discussion' and those that are not agreed and are either considered 'material' or 'not material'. Matters that remain 'in discussion' with RSPB Cymru include those that the Applicant believes are capable of resolution before the end of the Examination.

1.2.2.2 This note is intended to provide the Examining Authority with further context on the outstanding matters in the updated Initial SoCG between Mona Offshore Wind Project and the RSPB Cymru (REP5-052) submitted at Deadline 5 that were not considered to have been addressed by the Applicant's Deadline 5 submissions.

1.3 Matters not agreed in the RSPB Cymru SoCG

1.3.1.1 Table 1.1 summarises the offshore ornithological matters for the Mona Offshore Wind Project that have not yet been agreed with the RSPB Cymru. The Applicant has assigned a status to each matter based on its discussions with RSPB Cymru and how it anticipates these to be reflected in the final iteration of the SoCG at Deadline 7.

Table 1.1: Matters not agreed with the RSPB Cymru for the Mona Offshore Wind Project.

SoCG reference number	Matter	Summary of the Applicant's understanding of RSPB Cymru's position	Summary of the Applicant's position	Location for further information	Status in Deadline 5 SoCG (REP5-052)
RSPB.OO.4 RSPB.OO.6	Digital Aerial Surveys and baseline characterisation for Manx Shearwater	In their Relevant Representation (RR-017), RSPB Cymru expressed outstanding concerns that the Manx shearwater baseline characterisation using digital aerial surveys (DAS) does not adequately capture the activity of the species. Their position was that the diel variation in Manx shearwater activity means that the somewhat limited amount of time DAS were carried out is unlikely to properly characterise the activity of Manx shearwater at the Application site. RSPB Cymru also expressed concerns regarding whether the size and flight characteristics of the species make them harder to detect in the surveys.	Best practice survey techniques were employed for the Mona Offshore Wind Project DAS, but DAS cannot be undertaken at night, which is an inherent limitation of the survey methodology. Other data sources were also used to characterise the Manx Shearwater baseline for the application (e.g. tagging data from local colonies) to reduce some of the potential uncertainty regarding nighttime activity. The Applicant understands that the RSPB Cymru would like to see further information presented from those tagging studies. This is provided in section 1.6.1	See section 1.6.1	Ongoing point of discussion
RSPB.OO.17 RSPB.OO.26	Application of PVA	The Applicant has not presented PVA for some species because of the 1% increase in baseline mortality threshold adopted by the Mona Offshore Wind Project to determine which sites and species are taken forward for further assessment. The RSPB Cymru does not support the threshold adopted. RSPB Cymru acknowledges that Natural	While the 1% threshold does not originate from guidance, it is widely accepted by Statutory Nature Conservation Bodies (SNCBs) for English and Welsh offshore wind projects. This threshold is accepted by NRW (A) and the JNCC for the Mona Offshore Wind Project	See section 1.6.2	Ongoing point of discussion

SoCG reference number	Matter	Summary of the Applicant's understanding of RSPB Cymru's position	Summary of the Applicant's position	Location for further information	Status in Deadline 5 SoCG (REP5-052)
		Resources Wales (Advisory) (NRW (A)) and the Joint Nature Conservation Committee (JNCC) support the use of the 1% threshold for the Mona Offshore Wind Project, but RSPB Cymru supports the NatureScot guidance (NatureScot, 2023), which advises a lower threshold, 0.02% mortality, for PVAs to be undertaken.	assessments. The Applicant has submitted further offshore ornithology supporting information at Deadline 4 and Deadline 5, which assesses a number of highly precautionary scenarios. The Applicant hopes these submissions will allow the RSPB Cymru to agree with the conclusions of the project-alone, cumulative and in-combination assessments.		
RSPB.OO.5	Consideration of indirect ecosystem impacts	RSPB Cymru considers that the Mona Offshore Wind Project assessments have not fully considered indirect ecosystem impacts (e.g. displacement from foraging areas, additional energy expenditure, potential impacts on forage fish and wider ecosystem impacts such as changes in stratification).	The Applicant provided a detailed account of the assessment of ecosystems-level effects relevant to offshore ornithology within Volume 2, Chapter 5: Offshore ornithology (REP4-007) in response to the Examining Authority's question (Q1.17.15) and the Applicants Response to RSPB Cymru ExQ1 Responses (REP4-083). The RSPB Cymru agreed in the updated SoCG with the Applicant at Deadline 5 (REP5-052) that this concern would not make a material difference to the assessment presented in the application and,	See section 1.5.1	Not agreed- not material

SoCG reference number	Matter	Summary of the Applicant's understanding of RSPB Cymru's position	Summary of the Applicant's position	Location for further information	Status in Deadline 5 SoCG (REP5-052)
			therefore, no further information or assessment is required.		
RSPB.OO.9	Consideration of HPAI	RSPB Cymru has expressed concern regarding the potentially severe population scale impacts on seabird populations from the outbreak of the H5N1 strain of HPAI in 2022. RSPB Cymru does not agree that the implications on the assessment of the outbreak have been adequately assessed.	The Applicant acknowledged the unknown short-, medium- and long-term effects of the 2022 HPAI outbreak as a data limitation within section 5.3.11 of Volume 2, Chapter 5: Offshore ornithology (REP4-007). There is no agreed industry wide guidance on how HPAI should be considered within assessment or interpretation of results from baseline characterisation surveys. The RSPB Cymru have acknowledged in further engagement that this concern is industry wide and not solely in relation to the Mona Offshore Wind Project. Therefore, the Applicant has considered the impact of HPAI as far as possible and in accordance with the Natural England's advice note (September 2022) in section D3.16 of the Technical Engagement Plan Appendices - Part 1 (A to E) APP-042). Further action to resolve this	See section 1.4.1	Not agreed-material

SoCG reference number	Matter	Summary of the Applicant's understanding of RSPB Cymru's position	Summary of the Applicant's position	Location for further information	Status in Deadline 5 SoCG (REP5-052)
			concern should be undertaken through industry and stakeholder groups rather than by the Mona Offshore Wind Project.		
RSPB.OO.11 RSPB.OO.24 RSPB.OO.25	Collision risk methodology for Manx shearwater	RSPB Cymru stated that the collision risk methodology for Manx shearwater does not adequately consider behavioural change because of illuminations on offshore structures. RSPB Cymru acknowledges that there is no guidance regarding the assessment of behavioural change due to offshore structure (e.g. wind turbines) illuminations, and this concern needs to be addressed by the wider industry and other stakeholders.	The RSPB Cymru has acknowledged that there is no guidance regarding the assessment of behavioural change due to wind turbine illuminations, and this concern needs to be addressed by the wider industry and other stakeholders. Therefore, the Applicant has considered the impact of offshore structure illumination as far as possible. Further action to resolve this concern should be undertaken through industry and stakeholder groups rather than the Mona Offshore Wind Project.	See section 1.4.2	Not agreed-material

1.4 Items not agreed – Material

1.4.1 Consideration of HPAI

1.4.1.1 RSPB Cymru has expressed concern regarding the population scale impacts on seabird populations from the 2022 outbreak of the H5N1 strain of HPAI. This concern was raised during Expert Working Group (EWG) meeting four (in February 2023) (see Technical Engagement Plan Appendices - Part 1 (A to E) APP-042) and has been raised by RSPB Cymru through the SoCG process in examination (see RSPB.OO.9 within the Mona and RSPB Cymru SoCG (REP5-052)). The RSPB Cymru consider that the scale of the impact of HPAI means that seabird populations will be much less robust to additional mortality arising from offshore wind farm developments. It also means that there may need to be a reassessment of whether SPA populations are in Favourable Conservation Status. The disease has affected 61 bird species, including species such as northern gannet, razorbill, common guillemot, Atlantic puffin, Manx shearwater, northern fulmar and small and large gull species (Pearce-Higgins *et al*., 2022).

1.4.1.2 The Applicant acknowledged the unknown short, medium and long term effects of the 2022 HPAI outbreak as a data limitation within section 5.3.11 of Volume 2, Chapter 5: Offshore ornithology (REP4-007). The Applicant also considered the available evidence base on HPAI when determining the sensitivity of the offshore ornithology receptors within Volume 2, Chapter 5: Offshore ornithology (REP4-007) - for example, see paragraph 5.7.2.86 with respect to northern gannet.

1.4.1.3 As determined by Natural England guidance on HPAI in relation to baseline characterisation of offshore renewable projects (Natural England's advice note (September 2022) in section D3.16 of the Technical Engagement Plan Appendices - Part 1 (A to E) APP-042), as the baseline data for the Mona Offshore Wind Project were all collected prior to summer 2022 when HPAI began to affect seabird colonies (surveys commenced in March 2020 and were completed in February 2022), the application assessments remain a valid representation of typical seabird distribution and density.

1.4.1.4 The Natural England advice also set out that the expectation that "*the scale of impact is likely to remain in proportion to the size of the colony. For instance, if a population were reduced by 10% then we would expect 10% fewer collisions*". Therefore, the Applicant considers that the percentage increase in baseline mortalities would be unchanged in the event of a reduction of colony size and subsequent reduction in abundance in the proposed array and, therefore, the conclusions of the assessments within Volume 2, Chapter 5: Offshore ornithology (REP4-007) remain valid.

1.4.1.5 The RSPB Cymru do not agree with Natural England's guidance on HPAI in relation to baseline characterisation of offshore renewable projects (see RSPB.OO.9 within the Mona and Royal Society for the Protection of Birds Cymru SoCG (REP5-052)). The Applicant notes that there is no guidance from NRW (A), the JNCC or the RSPB Cymru, nor any agreed industry wide guidance on how HPAI should be considered within assessments or in the interpretation of results from baseline characterisation surveys. The RSPB Cymru has acknowledged in further engagement that this concern is industry wide and not solely in relation to the Mona Offshore Wind Project. Therefore, the Applicant has considered the impact of HPAI as far as possible and considers that further action to resolve this concern should be undertaken through industry and stakeholder groups rather than by the Mona Offshore Wind Project. The

Applicant expects this item to remain as 'Not agreed- Material' in the final SoCG with the RSPB Cymru at Deadline 7.

1.4.2 Collision risk methodology for Manx shearwater

1.4.2.1 The RSPB Cymru has outlined concerns in relation to the assessment of collision for Manx shearwater as the Applicant has not adequately considered behaviour change due to the safety lights on offshore structures. The concern is in relation to the Environmental Impact Assessment and Habitats Regulations Assessment and has led to the RSPB Cymru concluding that Adverse Effects on Integrity (AEoI) cannot be ruled out beyond reasonable scientific doubt for collision impacts and distributional change arising through the project alone and in combination with other projects for Manx shearwater at the following Special Protection Areas (SPA) (see RSPB.OO.11, RSPB.OO.24 and RSPB.OO.25 within the Mona and RSPB Cymru SoCG (REP5-052)):

- Copeland Islands SPA
- Irish Sea Front SPA
- Rum SPA
- St Kilda SPA
- Glannau Aberdaron ac Ynys Enlli/Aberdaron Coast and Bardsey Island SPA
- Skomer, Skokholm and the Seas off Pembrokeshire/Sgomer, Sgogwm a Moroedd Penfro SPA

1.4.2.2 The RSPB Cymru has acknowledged that there is no guidance regarding the assessment of behavioural change due to offshore structures (e.g. wind turbines) illuminations, and this concern needs to be addressed by the wider industry and other stakeholders.

1.4.2.3 In the absence of a collision risk modelling (CRM) approach to quantify the risk of collision due to light attraction or disorientation, the impact of collisions on Manx shearwater has used the stochastic CRM developed by Marine Scotland (McGregor et *al*., 2018), which accounts for nocturnal activity. All parameters used within collision risk modelling utilised SNCBs recommended parameters (such as Nocturnal Activity Factors (NAFs)) were agreed with the SNCBs during the second, third and fourth EWG meetings (and technical notes provided for the second meeting) during the pre-application phase (as presented in Consultation Report Appendices - Part 3 (D.25 to F) (APP-040). It must be noted that a previous study by Wade *et al*. (2016) suggested that Manx shearwater nocturnal activity was around half of their daylight activity. The CRM for Manx shearwater presented in Volume 6, Annex 5.3: Offshore ornithology collision risk modelling technical report F02 (REP2-020) used a rate of 1 instead of 0.5 for the NAF. As a result, the nocturnal collision risk is overestimated for this species in the application assessment, and the assessment is therefore considered to be very precautionary.

1.4.2.4 Therefore, the Applicant has considered the impact of offshore structure illumination as far as possible and further action to resolve this concern should be undertaken through industry and stakeholder groups rather than by the Mona Offshore Wind Project. The Applicant expects this item to remain as 'Not agreed- Material' in the final SoCG with the RSPB Cymru at Deadline 7.

1.5 Items not agreed – Not Material

1.5.1 Consideration of indirect ecosystem impacts

1.5.1.1 The RSPB Cymru's Relevant Representation (RR-071) highlights that RSPB Cymru considers that the Applicant's assessment has not fully considered indirect ecosystem impacts (e.g. displacement from foraging areas, additional energy expenditure, potential impacts on forage fish and wider ecosystem impacts such as changes in stratification). The Applicant responded to the RSPB Cymru's Relevant Representation in section 2.71 of the Applicant's Response to Relevant Representations (PDA-008). Potential impacts on offshore ornithology at the ecosystem level are assessed in the inter-related effects assessment (Paragraphs 11.6.3.10 to 12 and Table 11.10 of Volume 2, Chapter 11: Inter-related effects (offshore) (APP-063)).

1.5.1.2 The Applicant noted that Examining Authority's question Q1.17.15 requested the Applicant to explain how the application considers the resilience of ecosystems and potential ornithology effects regarding:

- displacement from foraging areas;
- species energy expenditure;
- impact on forage fish; and
- ocean stratification (Irish sea)

1.5.1.3 The Applicant provided a detailed account of how these elements of indirect ecosystem impacts were considered within Volume 2, Chapter 5: Offshore ornithology (REP4-007) in response to the Examining Authority's question (Q1.17.15) regarding the assessment of ecosystems level effects relevant to offshore ornithology in Response to Examining Authority's Written Questions (REP3-062).

1.5.1.4 The Applicant acknowledges that there are currently initiatives such as the Ecological Consequences of Offshore Wind research programme (ECOWind) in progress to improve understanding of ecosystem resilience to the development of offshore wind. For example, the Applicant is a partner of the ECOWind-ACCELERATE project in the east Irish Sea (other members include NRW, JNCC and RSPB) which is examining the ecological implications of accelerated seabed mobility around windfarms. Whilst it is acknowledged that these types of projects are in progress, the Applicant considers that the assessments have been undertaken in line with current SNCB guidance and industry best practices.

1.5.1.5 From further engagement with the RSPB Cymru, the Applicant understands that the RSPB Cymru would like to see these specific elements of indirect ecosystem impacts considered separately in future assessments. However, the RSPB Cymru agrees that this concern would not make a material difference to the assessments presented in the application. Therefore, the Applicant does not intend to provide any further information but will consider the RPSB Cymru's concern for future projects where relevant. The Applicant expects this item to remain 'Not agreed- not material' in the final SoCG with the RSPB Cymru at Deadline 7.

1.6 Items still under discussion

1.6.1 Digital Aerial Surveys and baseline characterisation for Manx Shearwater

1.6.1.1 The RSPB Cymru's Relevant Representation (RR-071) highlights that the RSPB Cymru have concerns over using DAS to characterise the baseline for Manx shearwater. The RSPB Cymru consider that the daily variation in Manx shearwater activity means that the amount of time DAS are carried out is unlikely to properly characterise the activity of Manx shearwater.

1.6.1.2 The RSPB Cymru also expressed concerns regarding whether the size and flight characteristics of Manx Shearwater may make them harder to detect in the DAS. As a result, RSPB Cymru does not have confidence in the baseline densities of Manx Shearwater presented in the assessment (see RSPB.OO.4 and RSPB.OO.6 within the Mona and RSPB Cymru SoCG (REP5-052)).

1.6.1.3 Whilst the use of DAS is currently the most commonly recommended method, the Applicant acknowledges the review by Deakin *et al*. (2018), which highlighted a number of potential biases in the detection of birds (using DAS) that could be exacerbated by the behaviour and morphology of some procellariform species, including Manx shearwater. The review makes recommendations for the need for experimental validation of potential biases in aerial survey methods, including detectability, identification and diel variation. Detectability could be tested by carrying out targeted DAS or vessel-based surveys with an experimental approach.

1.6.1.4 Best practice survey techniques were employed for the Mona Offshore Wind Project DAS, but DAS cannot be undertaken at night, which is an inherent limitation of the survey methodology. The Applicant acknowledged this limitation and that DAS "*represent a snapshot of each month*" within section 5.3.11 of Volume 2, Chapter 5: Offshore ornithology (REP4-007). DAS is widely adopted across the offshore industry to characterise offshore ornithology baselines, therefore this is considered to be an industry wide concern and not necessarily specific to the Mona Offshore Wind Project.

1.6.1.5 Other data sources were also used to characterise the Manx shearwater baseline for the application (e.g. tagging data from local colonies) to reduce some of the potential uncertainty regarding nighttime activity. Neither NRW nor the JNCC raised concerns pre-application (S42 response) on the suitability of DAS for Manx shearwater and the Applicant understands that NRW (A) and the JNCC are satisfied that the site specific DAS reflects Manx shearwater baseline characterisation (see items NRW.OO.4 and NRW.OO.7 in the Initial SoCG between Mona Offshore Wind Project and NRW (A) – Offshore (REP1-025); JNCC.OO.4 and JNCC.OO.7 in the Initial SoCG between Mona Offshore Wind Project and the JNCC (REP1-028)).

1.6.1.6 In response to the scoping opinion (see Table 1.1 in Volume 6, Annex 5.1: Offshore Ornithology Baseline Characterisation Technical Report (APP-091)), the Applicant provided further information on the tagging data that was used to further inform the Manx Shearwater baseline characterisation for the application. Paragraph 1.4.2.51 in Volume 6, Annex 5.1: Offshore Ornithology Baseline Characterisation Technical Report (APP-091) presents the Manx shearwater tracking data available from the Seabird Tracking Database together with the peer-reviewed scientific literature and concludes that the east part of the Irish Sea is used little by birds from Skomer.

1.6.1.7 From further engagement with the RSPB Cymru, the Applicant understands that the RSPB Cymru would like to see further information from those tagging studies. This information is provided below.

1.6.1.8 The Applicant hopes that this further information will address the RSPB Cymru's concerns and that this item can be agreed in the final SoCG with the RSPB at Deadline 7.

Manx Shearwater tagging studies

1.6.1.9 Tracking data from individual Manx shearwater breeding on Skomer, Bardsey, Lundy, Rum, and Copeland Island have been reviewed and where available, figures showing tracks or distribution maps are presented below.

1.6.1.10 Available tracking data from Skomer, Bardsey, Lundy, Rum, and Copeland Island indicate there is limited activity by Manx shearwater within the footprint of the Mona Offshore Wind Project. Only a few foraging trips from birds breeding at Skomer (Dean, 2012), Bardsey (Birdlife International, 2024) and Copeland (Dean, 2012) have been recorded near and across the Mona Offshore Wind Project, suggesting that Manx shearwater does not regularly use this area.

Skomer

1.6.1.11 At the Skomer Island colony, early work (from 2004 to 2006) showed the utilisation of the west and north sides of the Irish Sea, whilst few movements were observed eastwards (Figure 1.1) (Guilford *et al*., 2008).

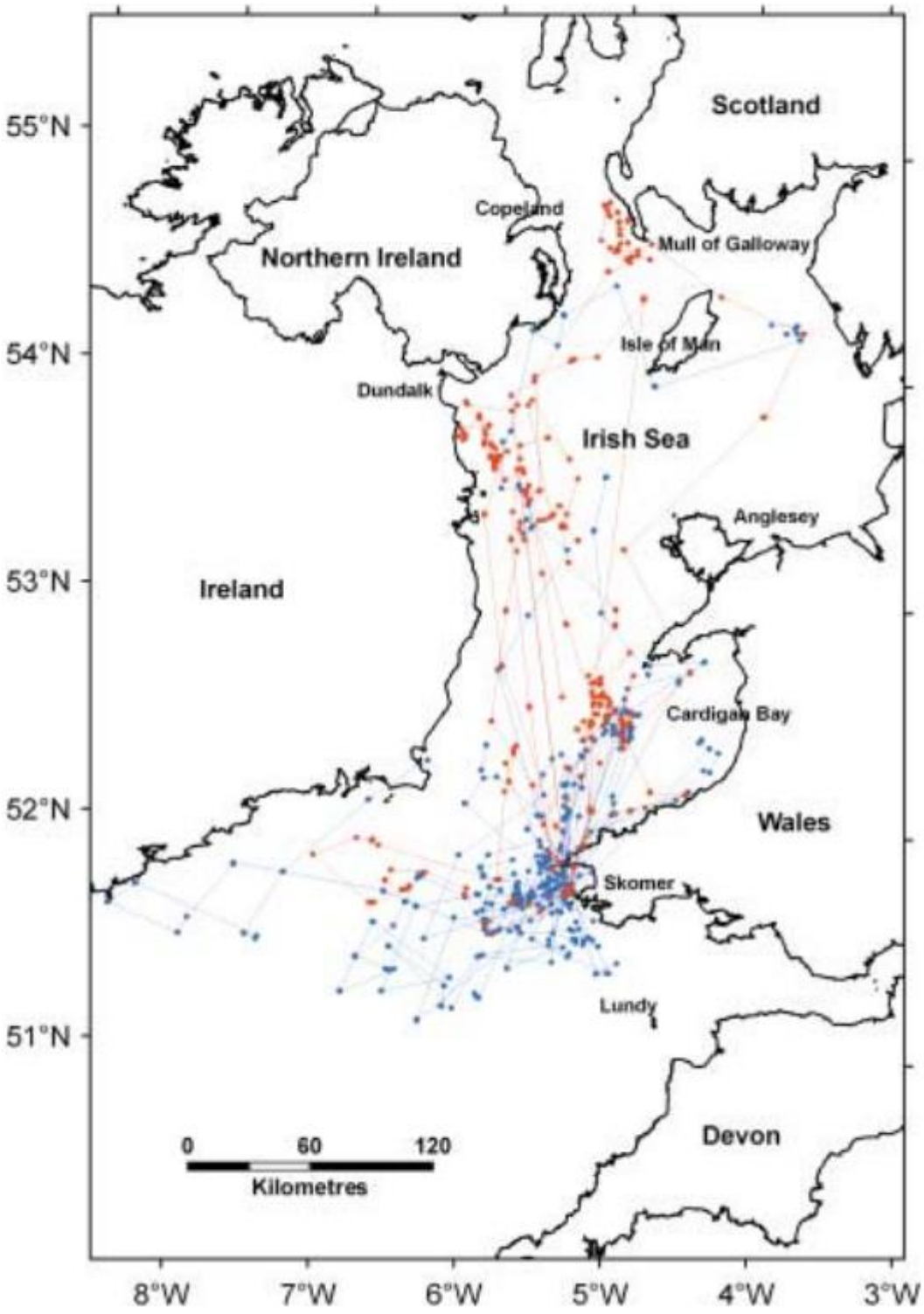

Figure 1.1: Figure showing fixes in sequence to show the approximate route of foraging excursions. The colour classification illustrates if the bird was, at the start of the excursion, incubating an egg (red) or rearing a chick (blue) (Guilford *et al*., 2008).

1.6.1.12 Tracking of Manx shearwater during the incubation and the chick-rearing period (2009 - 2011) at Skomer showed the birds to forage at the Irish Sea Front (Dean, 2012; Dean *et al.,* 2015) and little use of foraging areas in the east of the Irish sea. The tracking

illustrated little use of Mona Array Area by the Skomer birds (Figure 1.2 and Figure 1.3).

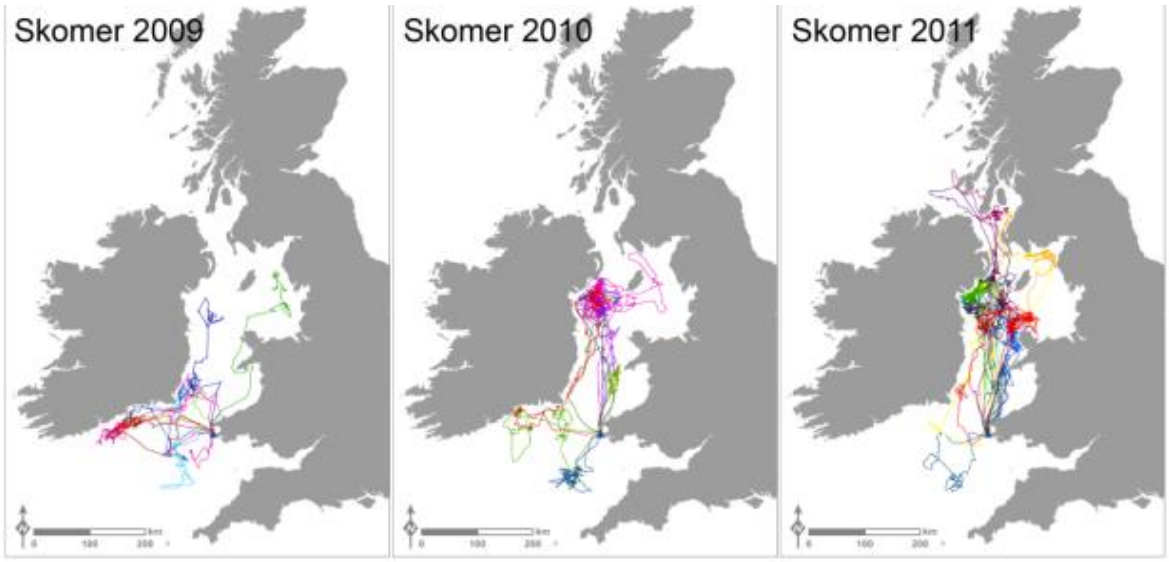

Figure 1.2: Foraging trips of birds from the Skomer colony during incubation (Dean, 2012).

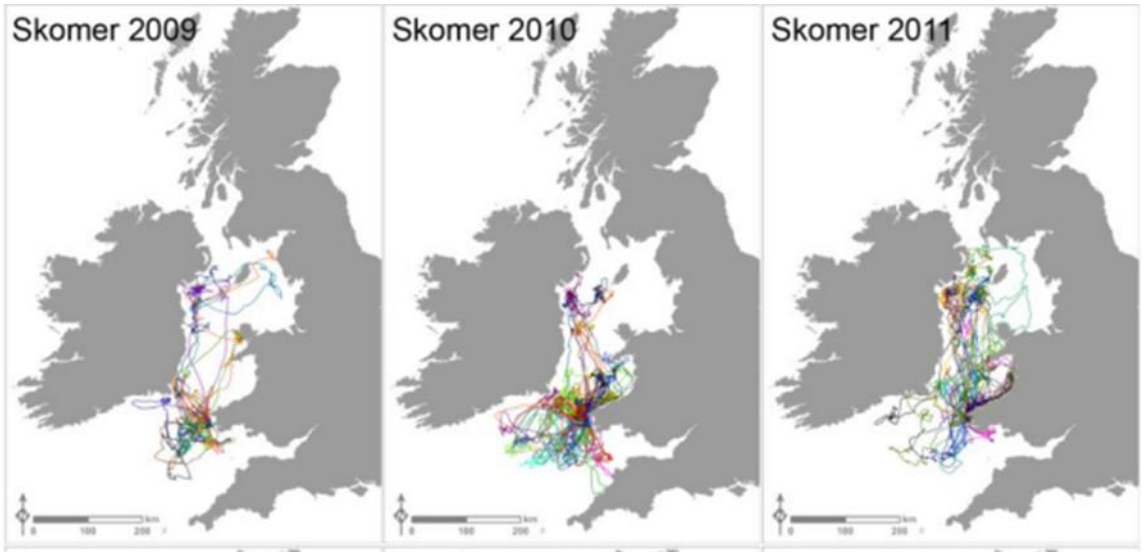

Figure 1.3: Foraging trips of birds from the Skomer colony during chick-rearing (Dean, 2012).

Bardsey

1.6.1.13 Tracking of 25 individuals at the Bardsey Colony (Wales) in 2017 showed a widespread utilisation of the Irish Sea during the breeding season, including some movements near and across the Mona Array Area (Figure 1.4) (BirdLife International, 2024).

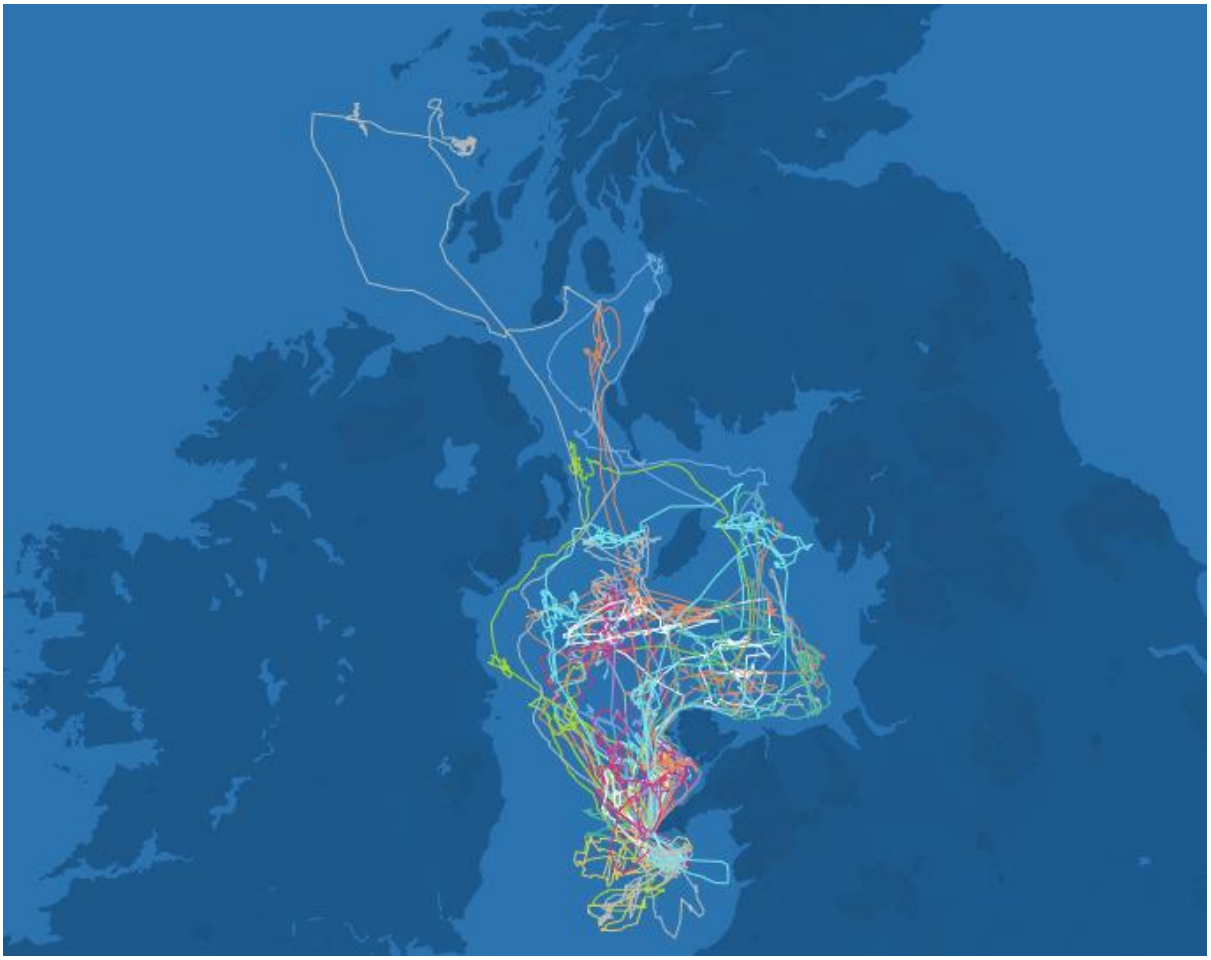

Figure 1.4: Foraging trips of individuals from Bardsey (BirdLife International, 2024)

Lundy

1.6.1.14 There has also been tracking work of individuals breeding at Lundy Island from 2009 to 2010 (Dean *et al*., 2010), with the data used as evidence for the designation of the Irish Sea Front as a SPA. There was, however, no use of the Mona Array Area by the Lundy birds (Figure 1.5).

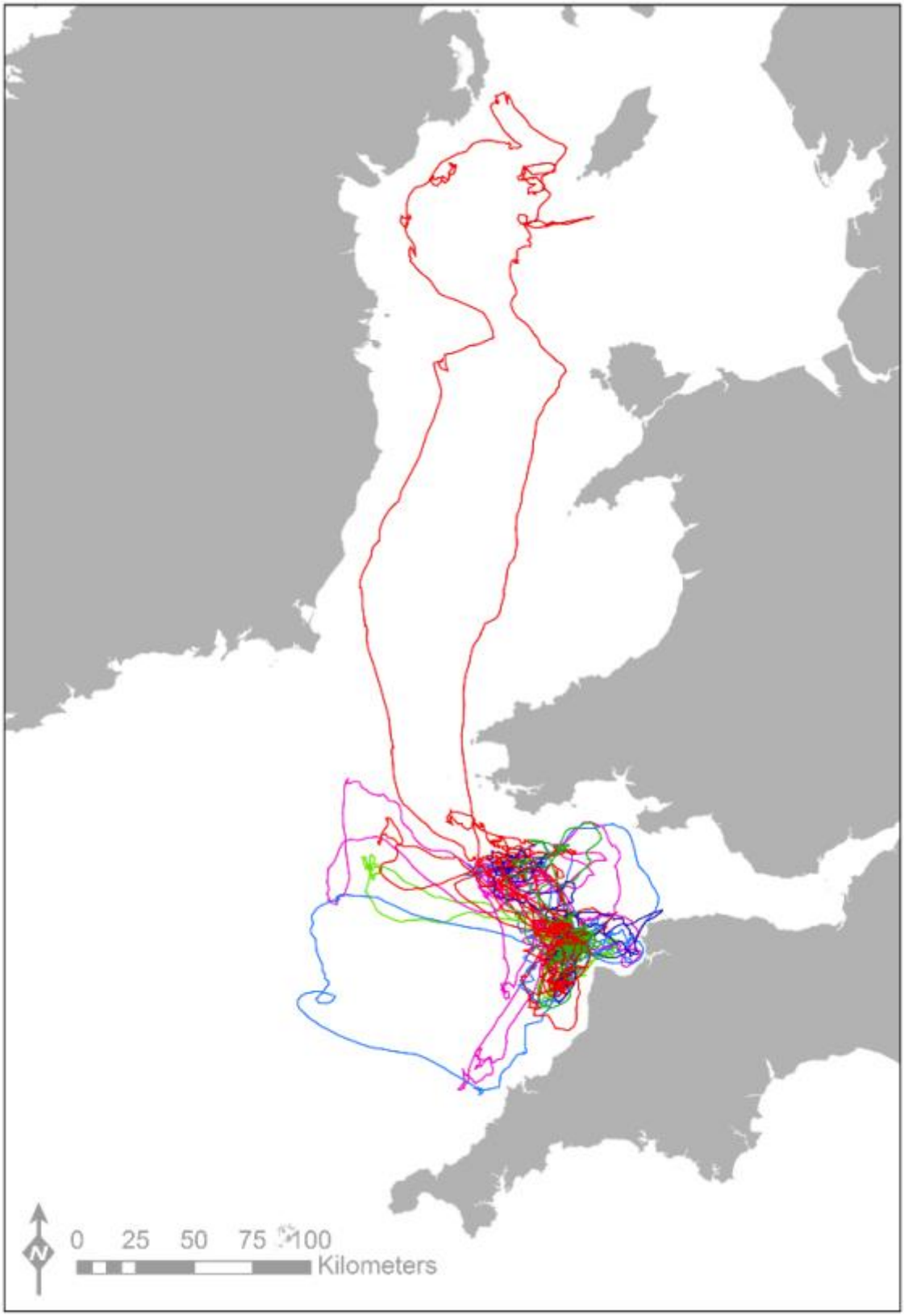

Figure 1.5: Figure showing the tracks of 10 Manx Shearwater breeding on Lundy in 2009 (Dean *et al*., 2010).

Rum

1.6.1.15 Dean (2012) showed no connectivity between the Rum colony and the Mona Array Area (Figure 1.6).

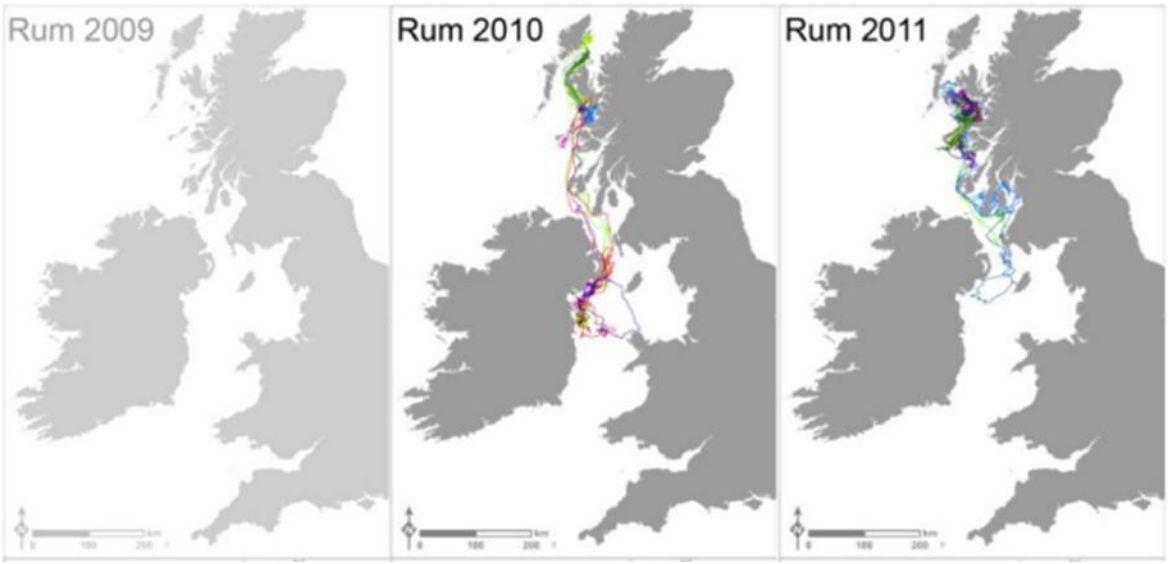

Figure 1.6: Foraging trips of birds from the Rum colony during chick-rearing (Dean, 2012).

Copeland

1.6.1.16 GPS tracking study of individuals captured in Copeland Island (Northern Ireland) from 2009 to 2011 revealed that birds made little use of the east part of the Irish Sea (Figure 1.7 and Figure 1.8), with the exception of one individual during the chick-rearing period (Dean, 2012).

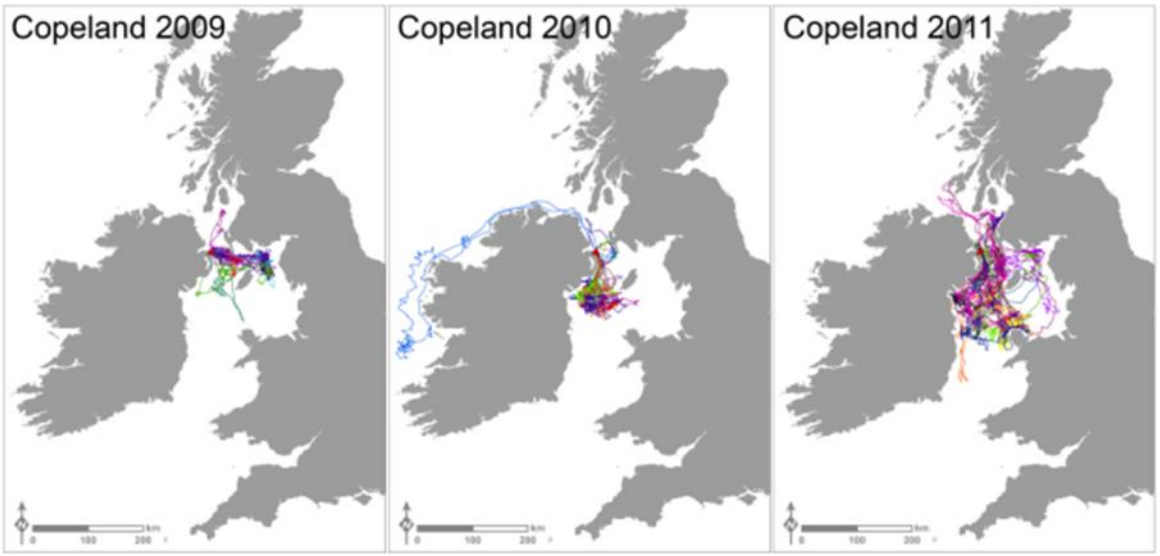

Figure 1.7: Foraging trips of birds from the Copeland colony during incubation (Dean, 2012).

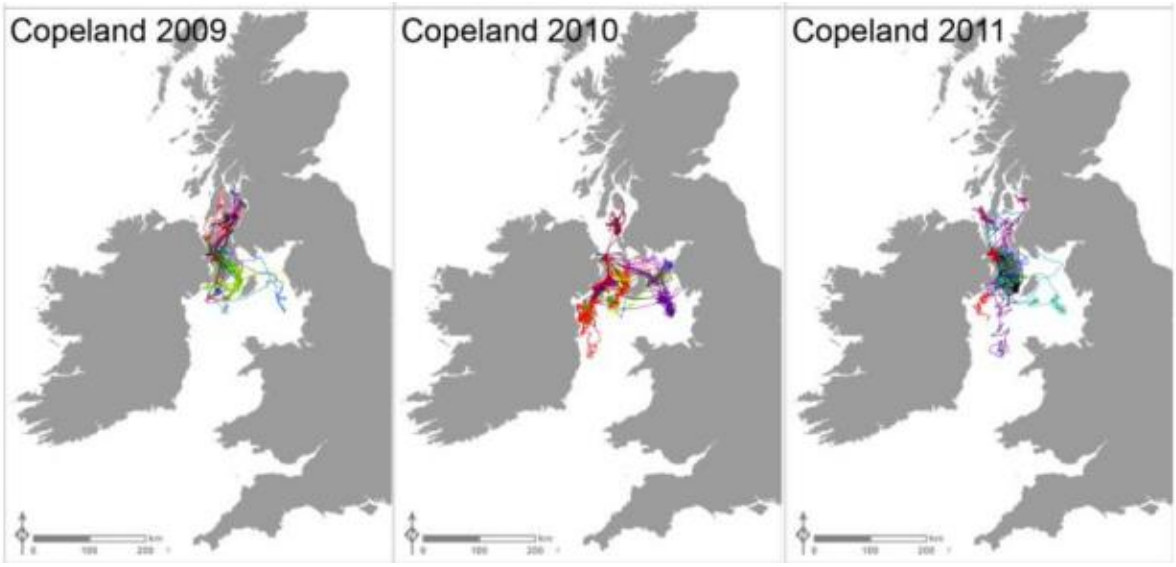

Figure 1.8: Foraging trips of birds from the Copeland colony during chick-rearing (Dean, 2012).

1.6.1.17 The tracking data helps to corroborate the findings of the site-specific surveys, which indicated the presence of Manx shearwater in June and July and suggested that foraging birds within the Mona Array Area are likely to be associated with the Welsh colonies.

1.6.2 Application of PVA

1.6.2.1 The RSPB Cymru raised concerns with the Applicant's approach to determining whether PVA ought to be undertaken (see RSPB.OO.17 and RSPB.OO.26 within the Mona and RPSB Cymru SoCG (REP5-052)). These concerns mean that the RSPB Cymru are unable to agree that there will be no significant effects on ornithology receptors in Environmental Impact Assessment (EIA) terms for the project cumulatively with other plans and projects or that there will be no AEoI for SPAs designated for offshore ornithology features for any impacts for the project in-combination with other projects and plans.

1.6.2.2 The Applicant has undertaken additional assessments (PVAs) where the impact on bird populations shows a >1% increase in baseline mortality. This was used in the Preliminary Environmental Information Report and the Application (Volume 2, Chapter 5: Offshore ornithology (REP4-007) and Volume 6, Annex 5.6: Offshore ornithology population viability analysis technical report (REP2-024)). While this threshold does not originate from guidance, it is widely accepted by SNCBs for English and Welsh offshore wind projects. This threshold is accepted by NRW (A) and the JNCC for the Mona Offshore Wind Project assessments. The Applicant did not receive any comments through the offshore ornithology EWG pre-application or statutory consultation on using the threshold of a 1% increase in baseline mortality from the RSPB Cymru.

1.6.2.3 The Applicant recognises that the RSPB Cymru supports the NatureScot guidance (NatureScot, 2023) that advises PVAs should be undertaken where the baseline mortality increase is above 0.02%. However, the Mona Offshore Wind Project is in Welsh waters and so has used the assessment parameters accepted by NRW (A) and the JNCC.

1.6.2.4 The Applicant has submitted further offshore ornithology supporting information at Deadline 4 and Deadline 5:

- Offshore ornithology additional supporting in-combination assessment information in line with SNCB advice (REP5-074)
- Offshore Ornithology Additional Supporting Cumulative Assessment Information in line with SNCB Advice (REP5-075)

1.6.2.5 While these additional assessments use the >1% increase in baseline mortality to trigger PVAs, they are exceptionally precautionary (for the reasons outlined in the relevant documents). Therefore, the Applicant hopes these submissions will allow RPSB Cymru to agree that there will be no significant effects on ornithology receptors in EIA terms for the project cumulatively with other plans and projects or that there will be no AEoI for SPAs designated for offshore ornithology features for any impacts from the Mona Offshore Wind Project in-combination with other projects and plans. Thus, the Applicant hopes that this item can be agreed in the final SoCG with the RSPB at Deadline 7.

1.7 Conclusions

1.7.1.1 The Applicant has set out its position on each of the outstanding matters in the Initial SoCG between Mona Offshore Wind Project and RSPB Cymru (REP5-052), the further progress expected within the examination and the anticipated status of each of these matters in the final SoCG with the RSPB Cymru at Deadline 7. The Applicant has provided further information on Manx Shearwater tracking studies and the Mona Offshore Wind Project specific Digital Aerial Surveys and baseline characterisation for Manx Shearwater. The Applicant hopes this further information will address the RSPB Cymru's concerns on these matters. The other matters outlined in this document are expected to remain as 'Not agreed- Material' or 'Not agreed-Not material' in the final SoCG with the RSPB Cymru at Deadline 7.

1.8 References

BirdLife International (2024) Seabird Tracking Database. Available at: http://seabirdtracking.org/Accessed: July 2024.

Dean, B., Freeman, R., Kirk, H., Guilford, T. (2010) Tracking the movements of Lundy's shearwaters. LFS Annual report 2010.

Dean, B. (2012) The at-sea behaviour of the Manx shearwater. Thesis submitted to the University of Oxford for the degree of Doctor of Philosophy, 2012. Available at: https://ora.ox.ac.uk/objects/uuid:3dc27434-100c-4fcc-a636-04538c676dc2/download_file?file_format=application%2Fpdf&safe_filename=Full-Thesis-VFINAL_08-June-013.pdf&type_of_work=Thesis

Dean, B., Kirk, H., Fayet, A., Shoji, A., Freeman, R., Leonard, K., ... & Guilford, T. (2015). Simultaneous multi-colony tracking of a pelagic seabird reveals cross-colony utilization of a shared foraging area. Marine Ecology Progress Series, 538, 239-248.

Guilford, T. C., Meade, J., Freeman, R., Biro, D., Evans, T., Bonadonna, F., Boyle, D., Roberts, S. and Perrins, C. M. (2008) GPS tracking of the foraging movements of Manx shearwaters *Puffinus puffinus* breeding on Skomer Island, Wales.

NatureScot. (2023) Guidance Note 11: Guidance to support Offshore Wind Applications: Marine Ornithology - Recommendations for Seabird Population Viability Analysis (PVA). Available at: https://www.nature.scot/doc/guidance-note-11-guidance-support-offshore-wind-applications-marine-ornithology-recommendations