

MONA OFFSHORE WIND PROJECT

HRA Stage 2 Information to Support an Appropriate Assessment

Part 1: Introduction and Background (F02)

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Image of an offshore wind farm

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Deadline 7 Changes

This document has been updated at Deadline 7 of the Mona Offshore Wind Project examination in order to reflect the change to the Order Limits, forming the Change Request, which was accepted by the Examining Authority on 19 December 2024.

The following figures have been updated to reflect the updated onshore red line boundary change:

- Figure 1.1: Location of the Mona Offshore Wind Project.

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Supporting Documents

- HRA Stage 2 ISAA Part 2 - SAC Assessments (Document reference E1.2)
- HRA Stage 2 ISAA Part 3 - SPA and Ramsar Sites Assessments (Document Reference E1.3)
- HRA Stage 1 Screening Report (Document Reference E1.4)
- HRA Integrity matrices (Document Reference E1.5)

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Glossary

Term	Meaning
Annex I habitat	A natural habitat type of European community interest, defined in Annex I of the Council Directive 92/43/EEC on the Conservation of natural habitats and of wild fauna and flora (Habitats Directive), whose conservation requires the designation of Special Areas of Conservation (SAC).
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.
Competent Authority	Regulation 6(1) defines competent authorities as "any Minister, government department, public or statutory undertaker, public body of any description or person holding a public office".
Conservation objectives	In its most general sense, a conservation objective is the specification of the overall target for the species and/or habitat types for which a site is designated in order for it to contribute to maintaining or reaching favourable conservation status of the habitats and species concerned, at the national, the biogeographical or the European level.
Cumulative effects	Changes to the environment caused by a combination of present and future projects, plans or activities.
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.
European Commission	The executive body of the European Union responsible for proposing legislation, enforcing European law, setting objectives and priorities for action, negotiating trade agreements and managing implementing European Union policies and the budget.
European site	A Special Area of Conservation (SAC), possible SAC (pSAC), or candidate SAC, (cSAC), a Special Protection Area (SPA) or potential SPA (pSPA), a site listed as a site of community importance (SCI).
Evidence Plan	The Evidence Plan 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) application for the Mona Offshore Wind Project.
Expert Working Group	Expert working groups set up with relevant stakeholders as part of the Evidence Plan process.
Habitats Directive	The Habitats Directive is the short name for European Union Council Directive 92/43/EEC on the conservation of natural habitats and of wild fauna and flora. The Directive led to the establishment of European sites and set out how they should be protected, it also extended to other topics such as European protected species.
Habitats Regulations	The Conservation (Natural Habitats, &c.) Regulations 1994, the Conservation of Habitats and Species Regulations 2017 and the Conservation of Offshore Marine Habitats and Species 2017.

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Term	Meaning
Habitats Regulations Assessment	A process required by the Habitats Regulations of identifying likely significant effects of a plan or project on a European site and (where likely significant effects are predicted or cannot be discounted) carrying out an appropriate assessment to ascertain whether the plan or project will adversely affect the integrity of the European site. If adverse effects on integrity cannot be ruled out, the latter stages of the process require consideration of the derogation provisions in the Habitats Regulations.
In-combination effects	The combined effect of the Mona Offshore Wind Project in-combination with the effects from a number of different projects on the same feature/receptor.
Inter-array cables	Cables which connect the wind turbines to each other and to the offshore substation platforms. Inter-array cables will carry the electrical current produced by the wind turbines to the offshore substation platforms.
Interconnector cables	Cables that may be required to interconnect the Offshore Substation Platforms in order to provide redundancy in the case of cable failure elsewhere.
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.
Likely Significant Effect	Any effect that may reasonably be predicted as a consequence of a plan or project that may affect the conservation objectives of the features for which the European site was designated, but excluding trivial or inconsequential effects. A likely effect is one that cannot be ruled out on the basis of objective information. A 'significant' effect is a test of whether a plan or project could undermine the site's conservation objectives.
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 'deemed marine licences' 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.
Maximum Design Scenario	The scenario within the design envelope with the potential to result in the greatest impact on a particular topic receptor, and therefore the one that should be assessed for that topic receptor.
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 Mean High Water Springs (MHWS), in which the offshore export cables will be located.
Mona Offshore Cable Corridor and Access Areas	The corridor located between the Mona Array Area and the landfall up to Mean High Water Springs (MHWS), in which the offshore export cables will be located and in which the intertidal access areas are 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.
Offshore Substation Platform	The offshore substation platforms located within the Mona Array Area will transform the electricity generated by the wind turbines to a higher voltage allowing the power to be efficiently transmitted to shore.
Ramsar site	A wetland site designated to be of international importance under The Convention on Wetlands, known as the Ramsar Convention.

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Term	Meaning
Special Area of Conservation	Special Areas of Conservation (SACs) are areas designated under the European Union (EU) Habitats Directive to help conserve certain plant and animals species listed in the Directive. Article 3 of the Habitats Directive requires the establishment of a European network of important high-quality conservation sites that will make a significant contribution to conserving the 189 habitat types and 788 species identified in Annexes I and II of the Directive (as amended). The listed habitat types and species are those considered to be most in need of conservation at a European level (excluding birds).
Special Protection Area	Special Protection Areas (SPAs) are sites classified under the EU Birds Directive (Directive 2009/147/EC of the European Parliament and of the Council on the conservation of wild birds) to protect rare or vulnerable birds (as listed on Annex I of the Directive), as well as regularly occurring migratory species.
Species	A group of living organisms consisting of similar individuals capable of exchanging genes or interbreeding.
The Planning Inspectorate	The agency responsible for operating the planning process for Nationally Significant Infrastructure Projects (NSIPs).
The Secretary of State for the Department for Energy Security and Net Zero	The decision maker with regards to the application for development consent for the Mona Offshore Wind Project.
Wind Turbines	The wind turbine generators, including the tower, nacelle and rotor.

Acronyms

Acronym	Description
cSAC	Candidate Special Area of Conservation
DCO	Development Consent Order
EDR	Effective Deterrent Range
EIA	Environmental Impact Assessment
EnBW	Energie Baden-Württemberg
EU	European Union
EMF	Electromagnetic Field
EWG	Expert Working Group
HRA	Habitats Regulations Assessment
HVAC	High Voltage Alternating Current
IROPI	Imperative Reasons of Overriding Public Interest
ISAA	Information to Support an Appropriate Assessment
JNCC	Joint Nature Conservation Committee
LAT	Lowest Astronomical Tide
LSE	Likely Significant Effect

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Acronym	Description
MHWS	Mean High Water Springs
MLWS	Mean Low Water Springs
MMO	Marine Management Organisation
NRW	National Resources Wales
NSIP	Nationally Significant Infrastructure Project
OSP	Offshore Substation Platform
PEIR	Preliminary Environmental Information Report
pSAC	Possible Special Area of Conservation
pSPA	Potential Special Protection Area
SAC	Special Area of Conservation
SCI	Sites of Community Importance
SNCB	Statutory Nature Conservation Bodies
SPA	Special Protection Area
SSC	Suspended Sediment Concentration
TCE	The Crown Estate
UXO	Unexploded Ordnance

Units

Unit	Description
dB	Decibel
μPa	Micropascal
km	Kilometres
km^2	Square kilometres
kV	Kilovolts
m	Metre
MW	Megawatt
nm	Nautical mile

1 Habitats Regulations Assessment Stage 2 Information to Support an Appropriate Assessment (ISAA) – Part 1: Introduction and Background

1.1 Structure of the HRA Stage 2 ISAA

1.1.1.1 For clarity and ease of navigation, the Habitats Regulations Assessment (HRA) Stage 2 ISAA is structured in three ‘Parts’, as follows:

- Part 1 – Introduction (this document)
- Part 2 – SAC Assessments (Document Reference E1.2)
- Part 3 – SPA and Ramsar Sites Assessments (Document Reference E1.3)
 - Part 3.1 - Offshore Ornithology ISAA Supporting Information (Document Reference E.1.3.1)
 - Part 3.2 - Assessment of Proposed Ramsar Sites within the Isle of Man (Document Reference E.1.3.2).

1.1.2 Structure of this document

1.1.2.1 This document constitutes Part 1 of the HRA Stage 2 ISAA and provides an introduction and background to the Mona Offshore Wind Project and the HRA process. The document is structured as follows:

- Section 1.2: Executive summary of the HRA Stage 2 ISAA report (all three Parts)
- Section 1.3: Introduction – this section describes the Mona Offshore Wind Project and establishes the need for, the purpose and structure of the ISAA
- Section 1.4: Habitats Regulations Assessment – this section sets out the process, principles, tests, (including those established by case law) and guidance applied to the ISAA
- Section 1.5: Consultation – this section provides a summary of the consultation undertaken to date of relevance to the ISAA, responses provided, and how these have been addressed.

1.2 Executive summary

1.2.1 Overview

1.2.1.1 This HRA Stage 2 ISAA report has been prepared by RPS, on behalf of the Applicant, to support the Habitats Regulations Assessment (HRA) under Section 63 of the Conservation of Habitats and Species Regulations 2017 and Section 28 of the Conservation of Offshore Marine Habitats and Species Regulations 2017 for the Mona Offshore Wind Project.

1.2.1.2 The HRA Stage 2 ISAA builds upon the HRA Stage 1 Screening Report (Document Reference E1.4) and considers whether the Mona Offshore Wind Project could have adverse effects, either alone or in-combination with other plans or projects, on the integrity of any European site. This report will provide the Competent Authority with the information required to undertake an HRA Stage 2 Appropriate Assessment.

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1.2.1.3 The scope of the HRA Stage 2 ISAA covers all relevant European sites and designated features where Likely Significant Effect (LSEs) have been identified due to the potential for impacts arising from the Mona Offshore Wind Project. This includes both 'offshore' European sites and features (seaward of Mean High Water Springs (MHWS)), and potential impacts of offshore and intertidal infrastructure seaward of MHWS. Impacts arising from the Mona Offshore Wind Project onshore infrastructure on European sites with onshore qualifying features (including Annex I habitats and Annex II onshore species (landward of Mean Low Water Springs (MLWS)) were also considered within the HRA Stage 1 Screening Report (Document Reference E1.4). However, the HRA Stage 1 Screening Report (Document Reference E1.4) ruled out the potential for LSE for all onshore European sites and therefore these are not considered within this HRA Stage 2 ISAA.

1.2.1.4 This assessment has taken account of the best available baseline information and has been undertaken in view of the measures proposed to be adopted as part of the Mona Offshore Wind Project to mitigate the potential for adverse effects.

1.2.1.5 The consideration of the potential for adverse effects on the integrity of European sites is made with reference to the overall ecological functions and the lasting preservation of the constitutive characteristics of the sites.

1.2.2 Annex I habitats

1.2.2.1 The conclusions of the HRA Stage 2 ISAA Part 2 - SAC assessments (Document Reference E1.2) for the Menai Strait and Conwy Bay/Y Fenai a Bae Conwy SAC are summarised in the following paragraphs 1.2.2.2 to 1.2.2.4.

Menai Strait and Conwy Bay/Y Fenai a Bae Conwy SAC

1.2.2.2 The HRA Stage 1 Screening Report (Document Reference E1.4) could not rule out the risk of LSE on the Menai Strait and Conwy Bay/Y Fenai a Bae Conwy Special Area of Conservation (SAC). The impacts of the Mona Offshore Wind Project have been assessed with respect to the conservation objectives of this site. Annex I habitats that are qualifying features of this European site, and were screened into assessment include:

- Reefs
- Sandbanks which are slightly covered by seawater all the time.

1.2.2.3 The HRA Stage 2 ISAA Part 2 - SAC assessments (Document Reference E1.2) assessed the following impacts:

- Increase in Suspended Sediment Concentration (SSC) and sediment deposition (Mona Offshore Cable Corridor and Access Areas only)
- Changes in physical processes
- Increased risk of introduction and spread of invasive non-native species
- Accidental pollution
- In-combination effects.

1.2.2.4 Based on the evidence set out in this report the assessment concluded that the conservation objectives for the site would not be undermined and there would be no adverse effect on the integrity of the Menai Strait and Conwy Bay/Y Fenai a Bae

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Conwy SAC as a result of the Mona Offshore Wind Project alone, or in combination with other plans and projects.

1.2.3 Annex II diadromous fish species

1.2.3.1 The conclusions of the HRA Stage 2 ISAA Part 2 - SAC assessments (Document Reference E1.2) for the European sites considered for Annex II diadromous fish are summarised in the following paragraphs 1.2.3.2 to 1.2.3.28 in order of increasing distance from the Mona Offshore Wind Project.

Dee Estuary/Aber Dyfrdwy SAC

1.2.3.2 The HRA Stage 1 Screening Report (Document Reference E1.4) could not rule out the risk of LSE on the Dee Estuary/Aber Dyfrdwy SAC. The impacts of the Mona Offshore Wind Project have been assessed with respect to the conservation objectives of this site. Annex II diadromous fish that are qualifying features of this European site, and were screened into assessment include:

- Sea lamprey
- River lamprey.

1.2.3.3 The HRA Stage 2 ISAA Part 2 – SAC assessments (Document Reference E1.2) assessed the following impacts for Annex II diadromous fish:

- Underwater sound
- Electromagnetic Field (EMF)
- In-combination effects.

1.2.3.4 Based on the evidence set out in this report the assessment concluded that the conservation objectives for the site would not be undermined and there would be no adverse effect on the integrity of the Dee Estuary/Aber Dyfrdwy SAC/Ramsar as a result of the Mona Offshore Wind Project alone, or in combination with other plans and projects.

River Dee and Bala Lake/Afon Dyfrdwy a Llyn Tegid SAC

1.2.3.5 The HRA Stage 1 Screening Report (Document Reference E1.4) could not rule out the risk of LSE on the River Dee and Bala Lake/Afon Dyfrdwy a Llyn Tegid SAC. The impacts of the Mona Offshore Wind Project have been assessed with respect to the conservation objectives of this site. Annex II diadromous fish that are qualifying features of this European site, and were screened into assessment include:

- Atlantic salmon
- Sea lamprey
- River lamprey.

1.2.3.6 The HRA Stage 2 ISAA Part 2 – SAC assessments (Document Reference E1.2) assessed the following impacts:

- Underwater sound
- EMF
- In-combination effects.

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1.2.3.7 Based on the evidence set out in this report the assessment concluded that the conservation objectives for the site would not be undermined and there would be no adverse effect on the integrity of the River Dee and Bala Lake/Afon Dyfrdwy a Llyn Tegid SAC as a result of the Mona Offshore Wind Project alone, or in combination with other plans and projects.

River Ehen SAC

1.2.3.8 The HRA Stage 1 Screening Report (Document Reference E1.4) could not rule out the risk of LSE on the River Ehen SAC. The impacts of the Mona Offshore Wind Project have been assessed with respect to the conservation objectives of this site. Annex II diadromous fish that are qualifying features of this European site, and were screened into assessment include:

- Atlantic salmon
- Freshwater pearl mussel.

1.2.3.9 The HRA Stage 2 ISAA Part 2– SAC assessments (Document Reference E1.2) assessed the following impacts:

- Underwater sound
- EMF
- In-combination effects.

1.2.3.10 Based on the evidence set out in this report the assessment concluded that the conservation objectives for the site would not be undermined and there would be no adverse effect on the integrity of the River Ehen SAC as a result of the Mona Offshore Wind Project alone, or in combination with other plans and projects.

River Eden SAC

1.2.3.11 The impacts of the Mona Offshore Wind Project have been assessed with respect to the Conservation objectives of this site. Annex II diadromous fish that are qualifying features of this European site, and were screened into assessment include:

- Atlantic salmon
- Sea lamprey
- River lamprey.

1.2.3.12 The HRA Stage 2 ISAA Part 2 – SAC assessments (Document Reference E1.2) assessed the following impacts:

- Underwater sound
- EMF
- In-combination effects.

1.2.3.13 Based on the evidence set out in this report the assessment concluded that the conservation objectives for the site would not be undermined and there would be no adverse effect on the integrity of the River Eden SAC as a result of the Mona Offshore Wind Project alone, or in combination with other plans and projects.

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Afon Gwyrfai a Llyn Cwellyn SAC

- 1.2.3.14 The HRA Stage 1 Screening Report (Document Reference E1.4) could not rule out the risk of LSE on the Afon Gwyrfai a Llyn Cwellyn SAC. The impacts of the Mona Offshore Wind Project have been assessed with respect to the conservation objectives of this site. Annex II diadromous fish that are qualifying features of this European site, and were screened into assessment include:
- Atlantic salmon.
- 1.2.3.15 The HRA Stage 2 ISAA Part 2 – SAC assessments (Document Reference E1.2) assessed the following impacts:
- Underwater sound
 - EMF
 - In-combination effects.
- 1.2.3.16 Based on the evidence set out in this report the assessment concluded that the conservation objectives for the site would not be undermined and there would be no adverse effect on the integrity of the Afon Gwyrfai a Llyn Cwellyn SAC as a result of the Mona Offshore Wind Project alone, or in combination with other plans and projects.

River Kent SAC

- 1.2.3.17 The HRA Stage 1 Screening Report (Document Reference E1.4) could not rule out the risk of LSE on the River Kent SAC. The impacts of the Mona Offshore Wind Project have been assessed with respect to the conservation objectives of this site. Annex II diadromous fish that are qualifying features of this European site, and were screened into assessment include:
- Freshwater pearl mussel.
- 1.2.3.18 The HRA Stage 2 ISAA Part 2 – SAC assessments (Document Reference E1.2) assessed the following impacts:
- Underwater sound
 - EMF
 - In-combination effects.
- 1.2.3.19 Based on the evidence set out in this report the assessment concluded that the conservation objectives for the site would not be undermined and there would be no adverse effect on the integrity of the River Kent SAC as a result of the Mona Offshore Wind Project alone, or in combination with other plans and projects.

River Derwent and Bassenthwaite Lake SAC

- 1.2.3.20 The HRA Stage 1 Screening Report (Document Reference E1.4) could not rule out the risk of LSE on the River Derwent and Bassenthwaite Lake SAC. The impacts of the Mona Offshore Wind Project have been assessed with respect to the conservation objectives of this site. Annex II diadromous fish that are qualifying features of this European site, and were screened into assessment include:

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- Atlantic salmon
- Sea lamprey
- River lamprey.

1.2.3.21 The HRA Stage 2 ISAA Part 2– SAC assessments (Document Reference E1.2) assessed the following impacts:

- Underwater sound
- EMF
- In-combination effects.

1.2.3.22 Based on the evidence set out in this report the assessment concluded that the conservation objectives for the site would not be undermined and there would be no adverse effect on the integrity of the River Derwent and Bassenthwaite Lake SAC as a result of the Mona Offshore Wind Project alone, or in combination with other plans and projects.

Solway Firth SAC

1.2.3.23 The HRA Stage 1 Screening Report (Document Reference E1.4) could not rule out the risk of LSE on the Solway Firth SAC. The impacts of the Mona Offshore Wind Project have been assessed with respect to the conservation objectives of this site. Annex II diadromous fish that are qualifying features of this European site, and were screened into assessment include:

- Sea lamprey
- River lamprey.

1.2.3.24 The HRA Stage 2 ISAA Part 2 – SAC assessments (Document Reference E1.2) assessed the following impacts:

- Underwater sound
- EMF
- In-combination effects.

1.2.3.25 Based on the evidence set out in this report the assessment concluded that the conservation objectives for the site would not be undermined and there would be no adverse effect on the integrity of the Solway Firth SAC as a result of the Mona Offshore Wind Project alone, or in combination with other plans and projects.

River Bladnoch SAC

1.2.3.26 The HRA Stage 1 Screening Report (Document Reference E1.4) could not rule out the risk of LSE on the River Bladnoch SAC. The impacts of the Mona Offshore Wind Project have been assessed with respect to the conservation objectives of this site. Annex II diadromous fish that are qualifying features of this European site, and were screened into assessment include:

- Atlantic salmon.

1.2.3.27 The HRA Stage 2 ISAA Part 2 – SAC assessments (Document Reference E1.2) assessed the following impacts:

- Underwater sound

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- EMF
- In-combination effects.

1.2.3.28 Based on the evidence set out in this report the assessment concluded that the conservation objectives for the site would not be undermined and there would be no adverse effect on the integrity of the River Bladnoch SAC as a result of the Mona Offshore Wind Project alone, or in combination with other plans and projects.

1.2.4 Annex II marine mammals

1.2.4.1 The conclusions of the HRA Stage 2 ISAA Part 2 - SAC assessments (Document Reference E1.2) for the European sites considered for Annex II marine mammals are summarised in the following paragraphs 1.2.4.2 to 1.2.4.100 in order of increasing distance from the Mona Offshore Wind Project.

North Anglesey Marine/Gogledd Môn Forol SAC

1.2.4.2 The HRA Stage 1 Screening Report (Document Reference E1.4) could not rule out the risk of LSE on the North Anglesey Marine/Gogledd Môn Forol SAC. The impacts of the Mona Offshore Wind Project have been assessed with respect to the conservation objectives of this site. Annex II marine mammals that are qualifying features of this European site, and were screened into assessment include:

- Harbour porpoise.

1.2.4.3 The HRA Stage 2 ISAA Part 2 – SAC assessments (Document Reference E1.2) assessed the following impacts:

- Underwater sound from piling
- Underwater sound from clearance of Unexploded Ordnance (UXO)
- Underwater sound from pre-construction site investigation surveys
- Underwater sound from vessels and other vessel activities (all phases)
- Changes in prey availability
- In-combination effects.

1.2.4.4 Based on the evidence set out in this report the assessment concluded that the conservation objectives for the site would not be undermined and there would be no adverse effect on the integrity of the North Anglesey Marine/Gogledd Môn Forol SAC as a result of the Mona Offshore Wind Project alone, or in combination with other plans and projects.

North Channel SAC

1.2.4.5 The HRA Stage 1 Screening Report (Document Reference E1.4) could not rule out the risk of LSE on the North Channel SAC. The impacts of the Mona Offshore Wind Project have been assessed with respect to the conservation objectives of this site. Annex II marine mammals that are qualifying features of this European site, and were screened into assessment include:

- Harbour porpoise.

1.2.4.6 The HRA Stage 2 ISAA Part 2 – SAC assessments (Document Reference E1.2) assessed the following impacts:

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- Underwater sound from piling
- Underwater sound from clearance of UXO
- Underwater sound from pre-construction site investigation surveys
- Underwater sound from vessels and other vessel activities (all phases)
- In-combination effects.

1.2.4.7 Based on the evidence set out in this report the assessment concluded that the conservation objectives for the site would not be undermined and there would be no adverse effect on the integrity of the North Channel SAC as a result of the Mona Offshore Wind Project alone, or in combination with other plans and projects.

Lleyn Peninsula and the Sarnau/Pen Llyn a`r Sarnau SAC

1.2.4.8 The HRA Stage 1 Screening Report (Document Reference E1.4) could not rule out the risk of LSE on the Lleyn Peninsula and the Sarnau/Pen Llyn a`r Sarnau SAC. The impacts of the Mona Offshore Wind Project have been assessed with respect to the conservation objectives of this site. Annex II marine mammals that are qualifying features of this European site, and were screened into assessment include:

- Bottlenose dolphin
- Grey seal.

1.2.4.9 The HRA Stage 2 ISAA Part 2 – SAC assessments (Document Reference E1.2) assessed the following impacts:

- Underwater sound from piling
- Underwater sound from clearance of UXO
- Underwater sound from pre-construction site investigation surveys
- Underwater sound from vessels and other vessel activities (all phases)
- In-combination effects.

1.2.4.10 Based on the evidence set out in this report the assessment concluded that the conservation objectives for the site would not be undermined and there would be no adverse effect on the integrity of the Lleyn Peninsula and the Sarnau/Pen Llyn a`r Sarnau SAC as a result of the Mona Offshore Wind Project alone, or in-combination with other plans and projects.

West Wales Marine/Gorllewin Cymru Forol SAC

1.2.4.11 The HRA Stage 1 Screening Report (Document Reference E1.4) could not rule out the risk of LSE on the West Wales Marine/Gorllewin Cymru Forol SAC. The impacts of the Mona Offshore Wind Project have been assessed with respect to the conservation objectives of this site. Annex II marine mammals that are qualifying features of this European site, and were screened into assessment include:

- Harbour porpoise.

1.2.4.12 The HRA Stage 2 ISAA Part 2 – SAC assessments (Document Reference E1.2) assessed the following impacts:

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- Underwater sound from piling
- Underwater sound from clearance of UXO
- Underwater sound from pre-construction site investigation surveys
- Underwater sound from vessels and other vessel activities (all phases)
- In-combination effects.

1.2.4.13 Based on the evidence set out in this report the assessment concluded that the conservation objectives for the site would not be undermined and there would be no adverse effect on the integrity of the West Wales Marine/Gorllewin Cymru Forol SAC as a result of the Mona Offshore Wind Project alone, or in combination with other plans and projects.

Strangford Lough

1.2.4.14 The HRA Stage 1 Screening Report (Document Reference E1.4) could not rule out the risk of LSE on the Strangford Lough SAC. The impacts of the Mona Offshore Wind Project have been assessed with respect to the conservation objectives of this site. Annex II marine mammals that are qualifying features of this European site, and were screened into assessment include:

- Harbour seal.

1.2.4.15 The HRA Stage 2 ISAA Part 2 – SAC assessments (Document Reference E1.2) assessed the following impacts:

- Underwater sound from piling
- Underwater sound from clearance of UXO
- Underwater sound from pre-construction site investigation surveys
- Underwater sound from vessels and other vessel activities (all phases)
- In-combination effects.

1.2.4.16 Based on the evidence set out in this report the assessment concluded that the conservation objectives for the site would not be undermined and there would be no adverse effect on the integrity of Strangford Lough SAC as a result of the Mona Offshore Wind Project alone, or in combination with other plans and projects.

Murlough SAC

1.2.4.17 The HRA Stage 1 Screening Report (Document Reference E1.4) could not rule out the risk of LSE on the Murlough SAC. The impacts of the Mona Offshore Wind Project have been assessed with respect to the conservation objectives of this site. Annex II marine mammals that are qualifying features of this European site, and were screened into assessment include:

- Harbour seal.

1.2.4.18 The HRA Stage 2 ISAA Part 2– SAC assessments (Document Reference E1.2) assessed the following impacts:

MONA OFFSHORE WIND PROJECT

- Underwater sound from piling
- Underwater sound from clearance of UXO
- Underwater sound from pre-construction site investigation surveys
- Underwater sound from vessels and other vessel activities (all phases)
- In-combination effects.

1.2.4.19 Based on the evidence set out in this report the assessment concluded that the conservation objectives for the site would not be undermined and there would be no adverse effect on the integrity of Murlough SAC as a result of the Mona Offshore Wind Project alone, or in combination with other plans and projects.

Cardigan Bay/Bae Ceredigion SAC

1.2.4.20 The HRA Stage 1 Screening Report (Document Reference E1.4) could not rule out the risk of LSE on the Cardigan Bay/Bae Ceredigion SAC. The impacts of the Mona Offshore Wind Project have been assessed with respect to the conservation objectives of this site. Annex II marine mammals that are qualifying features of this European site, and were screened into assessment include:

- Bottlenose dolphin.

1.2.4.21 The HRA Stage 2 ISAA Part 2– SAC assessments (Document Reference E1.2) assessed the following impacts:

- Underwater sound from piling
- Underwater sound from clearance of UXO
- Underwater sound from pre-construction site investigation surveys
- Underwater sound from vessels and other vessel activities (all phases)
- In-combination effects.

1.2.4.22 Based on the evidence set out in this report the assessment concluded that the conservation objectives for the site would not be undermined and there would be no adverse effect on the integrity of the Cardigan Bay/Bae Ceredigion SAC as a result of the Mona Offshore Wind Project alone, or in-combination with other plans and projects.

The Maidens SAC

1.2.4.23 The HRA Stage 1 Screening Report (Document Reference E1.4) could not rule out the risk of LSE on The Maidens SAC. The impacts of the Mona Offshore Wind Project have been assessed with respect to the conservation objectives of this site. Annex II marine mammals that are qualifying features of this European site, and were screened into assessment include:

- Grey seal.

1.2.4.24 The HRA Stage 2 ISAA Part 2 – SAC assessments (Document Reference E1.2) assessed the following impacts:

MONA OFFSHORE WIND PROJECT

- Underwater sound from piling
- Underwater sound from clearance of UXO
- Underwater sound from pre-construction site investigation surveys
- Underwater sound from vessels and other vessel activities (all phases)
- In-combination effects.

1.2.4.25 Based on the evidence set out in this report the assessment concluded that the conservation objectives for the site would not be undermined and there would be no adverse effect on the integrity of The Maidens SAC as a result of the Mona Offshore Wind Project alone, or in combination with other plans and projects.

Pembrokeshire Marine/Sir Benfro Forol SAC

1.2.4.26 The HRA Stage 1 Screening Report (Document Reference E1.4) could not rule out the risk of LSE on the Pembrokeshire Marine/Sir Benfro Forol SAC. The impacts of the Mona Offshore Wind Project have been assessed with respect to the conservation objectives of this site. Annex II marine mammals that are qualifying features of this European site, and were screened into assessment include:

- Grey seal.

1.2.4.27 The HRA Stage 2 ISAA Part 2 – SAC assessments (Document Reference E1.2) assessed the following impacts:

- Underwater sound from piling
- Underwater sound from clearance of UXO
- Underwater sound from pre-construction site investigation surveys
- Underwater sound from vessels and other vessel activities (all phases)
- In-combination effects.

1.2.4.28 Based on the evidence set out in this report the assessment concluded that the conservation objectives for the site would not be undermined and there would be no adverse effect on the integrity of the Pembrokeshire Marine/Sir Benfro Forol SAC as a result of the Mona Offshore Wind Project alone, or in combination with other plans and projects.

Bristol Channel Approaches/Dynesfeydd Môr Hafren SAC

1.2.4.29 The HRA Stage 1 Screening Report (Document Reference E1.4) could not rule out the risk of LSE on the Bristol Channel Approaches/Dynesfeydd Môr Hafren SAC. The impacts of the Mona Offshore Wind Project have been assessed with respect to the conservation objectives of this site. Annex II marine mammals that are qualifying features of this European site, and were screened into assessment include:

- Harbour porpoise.

1.2.4.30 The HRA Stage 2 ISAA Part 2 – SAC assessments (Document Reference E1.2) assessed the following impacts:

MONA OFFSHORE WIND PROJECT

- Underwater sound from piling
- Underwater sound from clearance of UXO
- Underwater sound from pre-construction site investigation surveys
- Underwater sound from vessels and other vessel activities (all phases)
- In-combination effects.

1.2.4.31 Based on the evidence set out in this report the assessment concluded that the conservation objectives for the site would not be undermined and there would be no adverse effect on the integrity of the Bristol Channel Approaches/Dynesfeydd Môr Hafren SAC as a result of the Mona Offshore Wind Project alone, or in combination with other plans and projects.

Lundy SAC

1.2.4.32 The HRA Stage 1 Screening Report (Document Reference E1.4) could not rule out the risk of LSE on the Lundy SAC. The impacts of the Mona Offshore Wind Project have been assessed with respect to the conservation objectives of this site. Annex II marine mammals that are qualifying features of this European site, and were screened into assessment include:

- Grey seal.

1.2.4.33 The HRA Stage 2 ISAA Part 2 – SAC assessments (Document Reference E1.2) assessed the following impacts:

- Underwater sound from piling
- Underwater sound from clearance of UXO
- Underwater sound from pre-construction site investigation surveys
- Underwater sound from vessels and other vessel activities (all phases)
- In-combination effects.

1.2.4.34 Based on the evidence set out in this report the assessment concluded that the conservation objectives for the site would not be undermined and there would be no adverse effect on the integrity of the Lundy SAC as a result of the Mona Offshore Wind Project alone, or in combination with other plans and projects.

Isles of Scilly Complex SAC

1.2.4.35 The HRA Stage 1 Screening Report (Document Reference E1.4) could not rule out the risk of LSE on the Isles of Scilly Complex SAC. The impacts of the Mona Offshore Wind Project have been assessed with respect to the conservation objectives of this site. Annex II marine mammals that are qualifying features of this European site, and were screened into assessment include:

- Grey seal.

1.2.4.36 The HRA Stage 2 ISAA Part 2 – SAC assessments (Document Reference E1.2) assessed the following impacts:

MONA OFFSHORE WIND PROJECT

- Underwater sound from piling
- Underwater sound from clearance of UXO
- Underwater sound from pre-construction site investigation surveys
- Underwater sound from vessels and other vessel activities (all phases)
- In-combination effects.

1.2.4.37 Based on the evidence set out in this report the assessment concluded that the conservation objectives for the site would not be undermined and there would be no adverse effect on the integrity of the Isles of Scilly Complex SAC as a result of the Mona Offshore Wind Project alone, or in combination with other plans and projects.

Rockabill to Dalkey Island SAC

1.2.4.38 The HRA Stage 1 Screening Report (Document Reference E1.4) could not rule out the risk of LSE on the Rockabill to Dalkey Island SAC. The impacts of the Mona Offshore Wind Project have been assessed with respect to the conservation objectives of this site. Annex II marine mammals that are qualifying features of this European site, and were screened into assessment include:

- Harbour porpoise.

1.2.4.39 The HRA Stage 2 ISAA Part 2 – SAC assessments (Document Reference E1.2) assessed the following impacts:

- Underwater sound from piling
- Underwater sound from clearance of UXO
- Underwater sound from pre-construction site investigation surveys
- Underwater sound from vessels and other vessel activities (all phases)
- In-combination effects.

1.2.4.40 Based on the evidence set out in this report the assessment concluded that the conservation objectives for the site would not be undermined and there would be no adverse effect on the integrity of Rockabill to Dalkey Island SAC as a result of the Mona Offshore Wind Project alone, or in combination with other plans and projects.

Saltee Islands SAC

1.2.4.41 The HRA Stage 1 Screening Report (Document Reference E1.4) could not rule out the risk of LSE on the Saltee Islands SAC. The impacts of the Mona Offshore Wind Project have been assessed with respect to the conservation objectives of this site. Annex II marine mammals that are qualifying features of this European site, and were screened into assessment include:

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- Grey seal.
- 1.2.4.42 The HRA Stage 2 ISAA Part 2 – SAC assessments (Document Reference E1.2) assessed the following impacts:
- Underwater sound from piling
 - Underwater sound from clearance of UXO
 - Underwater sound from pre-construction site investigation surveys
 - Underwater sound from vessels and other vessel activities (all phases)
 - In-combination effects.
- 1.2.4.43 Based on the evidence set out in this report the assessment concluded that the conservation objectives for the site would not be undermined and there would be no adverse effect on the integrity of Saltee Islands SAC as a result of the Mona Offshore Wind Project alone, or in combination with other plans and projects.

Roaringwater Bay and Islands SAC

- 1.2.4.44 The HRA Stage 1 Screening Report (Document Reference E1.4) could not rule out the risk of LSE on the Roaringwater Bay and Islands SAC. The impacts of the Mona Offshore Wind Project have been assessed with respect to the conservation objectives of this site. Annex II marine mammals that are qualifying features of this European site, and were screened into assessment include:
- Harbour porpoise.
- 1.2.4.45 The HRA Stage 2 ISAA Part 2 – SAC assessments (Document Reference E1.2) assessed the following impacts:
- Underwater sound from piling
 - Underwater sound from clearance of UXO
 - Underwater sound from pre-construction site investigation surveys
 - Underwater sound from vessels and other vessel activities (all phases)
 - In-combination effects.
- 1.2.4.46 Based on the evidence set out in this report the assessment concluded that the conservation objectives for the site would not be undermined and there would be no adverse effect on the integrity of Roaringwater Bay and Islands SAC as a result of the Mona Offshore Wind Project alone, or in combination with other plans and projects.

Blasket Islands SAC

- 1.2.4.47 The HRA Stage 1 Screening Report (Document Reference E1.4) could not rule out the risk of LSE on the Blasket Islands SAC. The impacts of the Mona Offshore Wind Project have been assessed with respect to the conservation objectives of this site. Annex II marine mammals that are qualifying features of this European site, and were screened into assessment include:
- Harbour porpoise.
- 1.2.4.48 The HRA Stage 2 ISAA Part 2 – SAC assessments (Document Reference E1.2) assessed the following impacts:
- Underwater sound from piling

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- Underwater sound from clearance of UXO
- Underwater sound from pre-construction site investigation surveys
- Underwater sound from vessels and other vessel activities (all phases)
- In-combination effects.

1.2.4.49 Based on the evidence set out in this report the assessment concluded that the conservation objectives for the site would not be undermined and there would be no adverse effect on the integrity of Blasket Islands SAC as a result of the Mona Offshore Wind Project alone, or in combination with other plans and projects.

Mers Celtiques - Talus du golfe de Gascogne Site of Community Importance (SCI)

1.2.4.50 The HRA Stage 1 Screening Report (Document reference E1.4) could not rule out the risk of LSE on the Mers Celtiques - Talus du golfe de Gascogne SCI. The impacts of the Mona Offshore Wind Project have been assessed with respect to the conservation objectives of this site. Annex II marine mammals that are qualifying features of this European site, and were screened into assessment include:

- Harbour porpoise.

1.2.4.51 The HRA Stage 2 ISAA Part 2 – SAC assessments (Document Reference E1.2) assessed the following impacts:

- Underwater sound from piling
- Underwater sound from clearance of UXO
- Underwater sound from pre-construction site investigation surveys
- Underwater sound from vessels and other vessel activities (all phases)
- In-combination effects.

1.2.4.52 Based on the evidence set out in this report the assessment concluded that the conservation objectives for the site would not be undermined and there would be no adverse effect on the integrity of the Mers Celtiques - Talus du golfe de Gascogne SCI as a result of the Mona Offshore Wind Project alone, or in combination with other plans and projects.

Abers - Côte des legends SCI

1.2.4.53 The HRA Stage 1 Screening Report (Document Reference E1.4) could not rule out the risk of LSE on the Abers - Côte des legends SCI. The impacts of the Mona Offshore Wind Project have been assessed with respect to the conservation objectives of this site. Annex II marine mammals that are qualifying features of this European site, and were screened into assessment include:

- Harbour porpoise.

1.2.4.54 The HRA Stage 2 ISAA Part 2 – SAC assessments (Document Reference E1.2) assessed the following impacts:

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- Underwater sound from piling
- Underwater sound from clearance of UXO
- Underwater sound from pre-construction site investigation surveys
- Underwater sound from vessels and other vessel activities (all phases)
- In-combination effects.

1.2.4.55 Based on the evidence set out in this report the assessment concluded that the conservation objectives for the site would not be undermined and there would be no adverse effect on the integrity of the Abers - Côte des legends SCI as a result of the Mona Offshore Wind Project alone, or in combination with other plans and projects.

Ouessant-Molène SCI

1.2.4.56 The HRA Stage 1 Screening Report (Document Reference E1.4) could not rule out the risk of LSE on the Ouessant-Molène SCI. The impacts of the Mona Offshore Wind Project have been assessed with respect to the conservation objectives of this site. Annex II marine mammals that are qualifying features of this European site, and were screened into assessment include:

- Harbour porpoise.

1.2.4.57 The HRA Stage 2 ISAA Part 2 – SAC assessments (Document Reference E1.2) assessed the following impacts:

- Underwater sound from piling
- Underwater sound from clearance of UXO
- Underwater sound from pre-construction site investigation surveys
- Underwater sound from vessels and other vessel activities (all phases)
- In-combination effects.

1.2.4.58 Based on the evidence set out in this report the assessment concluded that the conservation objectives for the site would not be undermined and there would be no adverse effect on the integrity of the Ouessant-Molène SCI as a result of the Mona Offshore Wind Project alone, or in combination with other plans and projects.

Côte de Granit rose-Sept-Iles SCI

1.2.4.59 The HRA Stage 1 Screening Report (Document Reference E1.4) could not rule out the risk of LSE on the Côte de Granit rose-Sept-Iles SCI. The impacts of the Mona Offshore Wind Project have been assessed with respect to the conservation objectives of this site. Annex II marine mammals that are qualifying features of this European site, and were screened into assessment include:

- Harbour porpoise.

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- 1.2.4.60 The HRA Stage 2 ISAA Part 2 – SAC assessments (Document Reference E1.2) assessed the following impacts:
- Underwater sound from piling
 - Underwater sound from clearance of UXO
 - Underwater sound from pre-construction site investigation surveys
 - Underwater sound from vessels and other vessel activities (all phases)
 - In-combination effects.

1.2.4.61 Based on the evidence set out in this report the assessment concluded that the conservation objectives for the site would not be undermined and there would be no adverse effect on the integrity of the Côte de Granit rose-Sept-Iles SCI as a result of the Mona Offshore Wind Project alone, or in combination with other plans and projects.

Anse de Goulven, dunes de Keremma SCI

1.2.4.62 The HRA Stage 1 Screening Report (Document Reference E1.4) could not rule out the risk of LSE on the Anse de Goulven, dunes de Keremma SCI. The impacts of the Mona Offshore Wind Project have been assessed with respect to the conservation objectives of this site. Annex II marine mammals that are qualifying features of this European site, and were screened into assessment include:

- Harbour porpoise.

1.2.4.63 The HRA Stage 2 ISAA Part 2 – SAC assessments (Document Reference E1.2) assessed the following impacts:

- Underwater sound from piling
- Underwater sound from clearance of UXO
- Underwater sound from pre-construction site investigation surveys
- Underwater sound from vessels and other vessel activities (all phases)
- In-combination effects.

1.2.4.64 Based on the evidence set out in this report the assessment concluded that the conservation objectives for the site would not be undermined and there would be no adverse effect on the integrity of the Anse de Goulven, dunes de Keremma SCI as a result of the Mona Offshore Wind Project alone, or in combination with other plans and projects.

Tregor Goëlo SCI

1.2.4.65 The HRA Stage 1 Screening Report (Document Reference E1.4) could not rule out the risk of LSE on the Tregor Goëlo SCI. The impacts of the Mona Offshore Wind Project have been assessed with respect to the conservation objectives of this site. Annex II marine mammals that are qualifying features of this European site, and were screened into assessment include:

- Harbour porpoise.

1.2.4.66 The HRA Stage 2 ISAA Part 2 – SAC assessments (Document Reference E1.2) assessed the following impacts:

- Underwater sound from piling

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- Underwater sound from clearance of UXO
- Underwater sound from pre-construction site investigation surveys
- Underwater sound from vessels and other vessel activities (all phases)
- In-combination effects.

1.2.4.67 Based on the evidence set out in this report the assessment concluded that the conservation objectives for the site would not be undermined and there would be no adverse effect on the integrity of the Tregor Goëlo SCI as a result of the Mona Offshore Wind Project alone, or in combination with other plans and projects.

Côtes de Crozon SCI

1.2.4.68 The HRA Stage 1 Screening Report (Document Reference E1.4) could not rule out the risk of LSE on the Côtes de Crozon SCI. The impacts of the Mona Offshore Wind Project have been assessed with respect to the conservation objectives of this site. Annex II marine mammals that are qualifying features of this European site, and were screened into assessment include:

- Harbour porpoise.

1.2.4.69 The HRA Stage 2 ISAA Part 2 – SAC assessments (Document Reference E1.2) assessed the following impacts:

- Underwater sound from piling
- Underwater sound from clearance of UXO
- Underwater sound from pre-construction site investigation surveys
- Underwater sound from vessels and other vessel activities (all phases)
- In-combination effects.

1.2.4.70 Based on the evidence set out in this report the assessment concluded that the conservation objectives for the site would not be undermined and there would be no adverse effect on the integrity of the Côtes de Crozon SCI as a result of the Mona Offshore Wind Project alone, or in combination with other plans and projects.

Chaussée de Sein SCI

1.2.4.71 The HRA Stage 1 Screening Report (Document Reference E1.4) could not rule out the risk of LSE on the Chaussée de Sein SCI. The impacts of the Mona Offshore Wind Project have been assessed with respect to the conservation objectives of this site. Annex II marine mammals that are qualifying features of this European site, and were screened into assessment include:

- Harbour porpoise.

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- 1.2.4.72 The HRA Stage 2 ISAA Part 2 – SAC assessments (Document Reference E1.2) assessed the following impacts:
- Underwater sound from piling
 - Underwater sound from clearance of UXO
 - Underwater sound from pre-construction site investigation surveys
 - Underwater sound from vessels and other vessel activities (all phases)
 - In-combination effects.
- 1.2.4.73 Based on the evidence set out in this report the assessment concluded that the conservation objectives for the site would not be undermined and there would be no adverse effect on the integrity of the Chaussée de Sein SCI as a result of the Mona Offshore Wind Project alone, or in combination with other plans and projects.

Cap Sizun SCI

- 1.2.4.74 The HRA Stage 1 Screening Report (Document Reference E1.4) could not rule out the risk of LSE on the Cap Sizun SCI. The impacts of the Mona Offshore Wind Project have been assessed with respect to the conservation objectives of this site. Annex II marine mammals that are qualifying features of this European site, and were screened into assessment include:
- Harbour porpoise.
- 1.2.4.75 The HRA Stage 2 ISAA Part 2 – SAC assessments (Document Reference E1.2) assessed the following impacts:
- Underwater sound from piling
 - Underwater sound from clearance of UXO
 - Underwater sound from pre-construction site investigation surveys
 - Underwater sound from vessels and other vessel activities (all phases)
 - In-combination effects.
- 1.2.4.76 Based on the evidence set out in this report the assessment concluded that the conservation objectives for the site would not be undermined and there would be no adverse effect on the integrity of the Cap Sizun SCI as a result of the Mona Offshore Wind Project alone, or in combination with other plans and projects.

Récifs du talus du golfe de Gascogne SCI

- 1.2.4.77 The HRA Stage 1 Screening Report (Document Reference E1.4) could not rule out the risk of LSE on the Récifs du talus du golfe de Gascogne SCI. The impacts of the Mona Offshore Wind Project have been assessed with respect to the conservation objectives of this site. Annex II marine mammals that are qualifying features of this European site, and were screened into assessment include:
- Harbour porpoise.
- 1.2.4.78 The HRA Stage 2 ISAA Part 2 – SAC assessments (Document Reference E1.2) assessed the following impacts:
- Underwater sound from piling
 - Underwater sound from clearance of UXO

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- Underwater sound from pre-construction site investigation surveys
- Underwater sound from vessels and other vessel activities (all phases)
- In-combination effects.

1.2.4.79 Based on the evidence set out in this report the assessment concluded that the conservation objectives for the site would not be undermined and there would be no adverse effect on the integrity of the Récifs du talus du golfe de Gascogne SCI as a result of the Mona Offshore Wind Project alone, or in combination with other plans and projects.

Anse de Vauville SCI

1.2.4.80 The HRA Stage 1 Screening Report (Document Reference E1.4) could not rule out the risk of LSE on the Anse de Vauville SCI. The impacts of the Mona Offshore Wind Project have been assessed with respect to the conservation objectives of this site. Annex II marine mammals that are qualifying features of this European site, and were screened into assessment include:

- Harbour porpoise.

1.2.4.81 The HRA Stage 2 ISAA Part 2 – SAC assessments (Document Reference E1.2) assessed the following impacts:

- Underwater sound from piling
- Underwater sound from clearance of UXO
- Underwater sound from pre-construction site investigation surveys
- Underwater sound from vessels and other vessel activities (all phases)
- In-combination effects.

1.2.4.82 Based on the evidence set out in this report the assessment concluded that the conservation objectives for the site would not be undermined and there would be no adverse effect on the integrity of the Anse de Vauville SCI as a result of the Mona Offshore Wind Project alone, or in combination with other plans and projects.

Cap d'Erquy-Cap Fréhel SCI

1.2.4.83 The HRA Stage 1 Screening Report (Document Reference E1.4) could not rule out the risk of LSE on the Cap d'Erquy-Cap Fréhel SCI. The impacts of the Mona Offshore Wind Project have been assessed with respect to the conservation objectives of this site. Annex II marine mammals that are qualifying features of this European site, and were screened into assessment include:

- Harbour porpoise.

1.2.4.84 The HRA Stage 2 ISAA Part 2 – SAC assessments (Document Reference E1.2) assessed the following impacts:

- Underwater sound from piling
- Underwater sound from clearance of UXO
- Underwater sound from pre-construction site investigation surveys
- Underwater sound from vessels and other vessel activities (all phases)
- In-combination effects.

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1.2.4.85 Based on the evidence set out in this report the assessment concluded that the conservation objectives for the site would not be undermined and there would be no adverse effect on the integrity of the Cap d'Erquy-Cap Fréhel SCI as a result of the Mona Offshore Wind Project alone, or in combination with other plans and projects.

Baie de Saint-Brieuc – Est SCI

1.2.4.86 The HRA Stage 1 Screening Report (Document Reference E1.4) could not rule out the risk of LSE on the Baie de Saint-Brieuc – Est SCI. The impacts of the Mona Offshore Wind Project have been assessed with respect to the conservation objectives of this site. Annex II marine mammals that are qualifying features of this European site, and were screened into assessment include:

- Harbour porpoise.

1.2.4.87 The HRA Stage 2 ISAA Part 2 – SAC assessments (Document Reference E1.2) assessed the following impacts:

- Underwater sound from piling
- Underwater sound from clearance of UXO
- Underwater sound from pre-construction site investigation surveys
- Underwater sound from vessels and other vessel activities (all phases)
- In-combination effects.

1.2.4.88 Based on the evidence set out in this report the assessment concluded that the conservation objectives for the site would not be undermined and there would be no adverse effect on the integrity of the Baie de Saint-Brieuc – Est SCI as a result of the Mona Offshore Wind Project alone, or in combination with other plans and projects.

Banc et récifs de Surtainville SCI

1.2.4.89 The HRA Stage 1 Screening Report (Document Reference E1.4) could not rule out the risk of LSE on the Banc et récifs de Surtainville SCI. The impacts of the Mona Offshore Wind Project have been assessed with respect to the conservation objectives of this site. Annex II marine mammals that are qualifying features of this European site, and were screened into assessment include:

- Harbour porpoise.

1.2.4.90 The HRA Stage 2 ISAA Part 2 – SAC assessments (Document Reference E1.2) assessed the following impacts:

- Underwater sound from piling
- Underwater sound from clearance of UXO
- Underwater sound from pre-construction site investigation surveys
- Underwater sound from vessels and other vessel activities (all phases)
- In-combination effects.

1.2.4.91 Based on the evidence set out in this report the assessment concluded that the conservation objectives for the site would not be undermined and there would be no adverse effect on the integrity of the Banc et récifs de Surtainville SCI as a result of the Mona Offshore Wind Project alone, or in combination with other plans and projects.

Baie de Lancieux, Baie de l'Arguenon, Archipel de Saint Malo et Dinard SCI

1.2.4.92 The HRA Stage 1 Screening Report (Document Reference E1.4) could not rule out the risk of LSE on the Baie de Lancieux, Baie de l'Arguenon, Archipel de Saint Malo et Dinard SCI. The impacts of the Mona Offshore Wind Project have been assessed with respect to the conservation objectives of this site. Annex II marine mammals that are qualifying features of this European site, and were screened into assessment include:

- Harbour porpoise.

1.2.4.93 The HRA Stage 2 ISAA Part 2 – SAC assessments (Document Reference E1.2) assessed the following impacts:

- Underwater sound from piling
- Underwater sound from clearance of UXO
- Underwater sound from pre-construction site investigation surveys
- Underwater sound from vessels and other vessel activities (all phases)
- In-combination effects.

1.2.4.94 Based on the evidence set out in this report the assessment concluded that the conservation objectives for the site would not be undermined and there would be no adverse effect on the integrity of the Baie de Lancieux, Baie de l'Arguenon, Archipel de Saint Malo et Dinard SCI as a result of the Mona Offshore Wind Project alone, or in combination with other plans and projects.

Estuaire de la Rance SCI

1.2.4.95 The HRA Stage 1 Screening Report (Document Reference E1.4) could not rule out the risk of LSE on the Estuaire de la Rance SCI. The impacts of the Mona Offshore Wind Project have been assessed with respect to the conservation objectives of this site. Annex II marine mammals that are qualifying features of this European site, and were screened into assessment include:

- Harbour porpoise.

1.2.4.96 The HRA Stage 2 ISAA Part 2 – SAC assessments (Document Reference E1.2) assessed the following impacts:

- Underwater sound from piling
- Underwater sound from clearance of UXO
- Underwater sound from pre-construction site investigation surveys
- Underwater sound from vessels and other vessel activities (all phases)
- In-combination effects.

1.2.4.97 Based on the evidence set out in this report the assessment concluded that the conservation objectives for the site would not be undermined and there would be no adverse effect on the integrity of the Estuaire de la Rance SCI as a result of the Mona Offshore Wind Project alone, or in combination with other plans and projects.

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Baie du Mont Saint Michel SCI

- 1.2.4.98 The HRA Stage 1 Screening Report (Document Reference E1.4) could not rule out the risk of LSE on the Baie du Mont Saint Michel SCI. The impacts of the Mona Offshore Wind Project have been assessed with respect to the conservation objectives of this site. Annex II marine mammals that are qualifying features of this European site, and were screened into assessment include:
- Harbour porpoise.
- 1.2.4.99 The HRA Stage 2 ISAA Part 2 – SAC assessments (Document Reference E1.2) assessed the following impacts:
- Underwater sound from piling
 - Underwater sound from clearance of UXO
 - Underwater sound from pre-construction site investigation surveys
 - Underwater sound from vessels and other vessel activities (all phases)
 - In-combination effects.
- 1.2.4.100 Based on the evidence set out in this report the assessment concluded that the conservation objectives for the site would not be undermined and there would be no adverse effect on the integrity of the Baie du Mont Saint Michel SCI as a result of the Mona Offshore Wind Project alone, or in combination with other plans and projects.

1.2.5 Offshore ornithology

- 1.2.5.1 The conclusions of the HRA Stage 2 ISAA Part 3 – SPA and Ramsar Sites Assessments (Document Reference E1.3) for the European sites considered for offshore ornithology are summarised in the following paragraphs 1.2.5.2 to 1.2.5.100 in order of increasing distance from the Mona Offshore Wind Project.

Liverpool Bay/Bae Lerpwl Special Protection Area (SPA)

- 1.2.5.2 The HRA Stage 1 Screening Report (Document Reference E1.4) could not rule out the risk of LSE on the Liverpool Bay/Bae Lerpwl SPA. The impacts of the Mona Offshore Wind Project have been assessed with respect to the conservation objectives of this site. Seabird species that are qualifying features of this European site, and were screened into assessment include:
- Red-throated diver
 - Little gull
 - Common scoter
 - Little tern
 - Common tern
 - Waterbird assemblage.
- 1.2.5.3 The HRA Stage 2 ISAA Part 2 – SPA assessments (Document Reference E1.3) assessed the following impacts:
- Temporary habitat loss/disturbance and increased SSC

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- Disturbance and displacement from airborne sound and presence of vessels and infrastructure
- Changes in prey availability (construction only)
- Accidental pollution
- In-combination effects.

1.2.5.4 Based on the evidence set out in this report the assessment concluded that the conservation objectives for the site would not be undermined and there would be no adverse effect on the integrity of the Liverpool Bay/Bae Lerpwl SPA as a result of the Mona Offshore Wind Project alone, or in combination with other plans and projects.

Ribble and Alt Estuaries SPA and Ramsar site

1.2.5.5 The HRA Stage 1 Screening Report (Document Reference E1.4) could not rule out the risk of LSE on the Ribble and Alt Estuaries SPA and Ramsar site. The impacts of the Mona Offshore Wind Project have been assessed with respect to the conservation objectives of this site. Seabird species that are qualifying features of this European site, and were screened into assessment include:

- Lesser black-backed gull.

1.2.5.6 The HRA Stage 2 ISAA Part 3 – SPA and Ramsar site assessments (Document Reference E1.3) assessed the following impacts:

- Collision risk
- In-combination effects.

1.2.5.7 Based on the evidence set out in this report the assessment concluded that the conservation objectives for the site would not be undermined and there would be no adverse effect on the integrity of the Ribble and Alt Estuaries SPA and Ramsar site as a result of the Mona Offshore Wind Project alone, or in combination with other plans and projects.

Irish Sea Front SPA

1.2.5.8 The HRA Stage 1 Screening Report (Document Reference E1.4) could not rule out the risk of LSE on the Irish Sea Front SPA. The impacts of the Mona Offshore Wind Project have been assessed with respect to the conservation objectives of this site. Seabird species that are qualifying features of this European site, and were screened into assessment include:

- Manx shearwater.

1.2.5.9 The HRA Stage 2 ISAA Part 3 – SPA and Ramsar site assessments (Document Reference E1.3) assessed the following impacts:

- Disturbance and displacement from airborne sound and presence of vessels and infrastructure
- In-combination effects

1.2.5.10 Based on the evidence set out in this report the assessment concluded that the conservation objectives for the site would not be undermined and there would be no adverse effect on the integrity of the Irish Sea Front SPA as a result of the Mona Offshore Wind Project alone, or in combination with other plans and projects.

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Bowland Fells SPA

- 1.2.5.11 The HRA Stage 1 Screening Report (Document Reference E1.4) could not rule out the risk of LSE on the Bowland Fells SPA. The impacts of the Mona Offshore Wind Project have been assessed with respect to the conservation objectives of this site. Seabird species that are qualifying features of this European site, and were screened into assessment include:
- Lesser black-backed gull.
- 1.2.5.12 The HRA Stage 2 ISAA Part 3 – SPA and Ramsar site assessments (Document Reference E1.3) assessed the following impacts:
- Collision risk
 - In-combination effects.
- 1.2.5.13 Based on the evidence set out in this report the assessment concluded that the conservation objectives for the site would not be undermined and there would be no adverse effect on the integrity of the Bowland Fells SPA as a result of the Mona Offshore Wind Project alone, or in combination with other plans and projects.

Glannau Aberdaron ac Ynys Enlli/Aberdaron Coast and Bardsey Island SPA

- 1.2.5.14 The HRA Stage 1 Screening Report (Document Reference E1.4) could not rule out the risk of LSE on the Glannau Aberdaron ac Ynys Enlli/Aberdaron Coast and Bardsey Island SPA. The impacts of the Mona Offshore Wind Project have been assessed with respect to the conservation objectives of this site. Seabird species that are qualifying features of this European site, and were screened into assessment include:
- Manx shearwater.
- 1.2.5.15 The HRA Stage 2 ISAA Part 3 – SPA and Ramsar site assessments (Document Reference E1.3) assessed the following impacts:
- Disturbance and displacement from airborne sound and presence of vessels and infrastructure
 - In-combination effects.
- 1.2.5.16 Based on the evidence set out in this report the assessment concluded that the conservation objectives for the site would not be undermined and there would be no adverse effect on the integrity of the Glannau Aberdaron ac Ynys Enlli/Aberdaron Coast and Bardsey Island SPA as a result of the Mona Offshore Wind Project alone, or in combination with other plans and projects.

Lambay Island SPA

- 1.2.5.17 The HRA Stage 1 Screening Report (Document Reference E1.4) could not rule out the risk of LSE on the Lambay Island. The impacts of the Mona Offshore Wind Project have been assessed with respect to the conservation objectives of this site. Seabird species that are qualifying features of this European site, and were screened into assessment include:
- Black-legged kittiwake

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- 1.2.5.18 The HRA Stage 2 ISAA Part 3 – SPA and Ramsar site assessments (Document Reference E1.3) assessed the following impacts:
- Disturbance and displacement from airborne sound and presence of vessels and infrastructure (in-combination effects only)
 - Collision risk
 - In-combination effects.
- 1.2.5.19 Based on the evidence set out in this report the assessment concluded that the conservation objectives for the site would not be undermined and there would be no adverse effect on the integrity of the Lambay Island SPA as a result of the Mona Offshore Wind Project alone, or in combination with other plans and projects.

Howth Head Coast SPA

- 1.2.5.20 The HRA Stage 1 Screening Report (Document Reference E1.4) could not rule out the risk of LSE on the Howth Head Coast SPA. The impacts of the Mona Offshore Wind Project have been assessed with respect to the conservation objectives of this site. Seabird species that are qualifying features of this European site, and were screened into assessment include:
- Black-legged kittiwake
- 1.2.5.21 The HRA Stage 2 ISAA Part 3 – SPA and Ramsar site assessments (Document Reference E1.3) assessed the following impacts:
- Disturbance and displacement from airborne sound and presence of vessels and infrastructure
 - Collision risk
 - In-combination effects.
- 1.2.5.22 Based on the evidence set out in this report the assessment concluded that the conservation objectives for the site would not be undermined and there would be no adverse effect on the integrity of the Howth Head Coast SPA as a result of the Mona Offshore Wind Project alone, or in combination with other plans and projects.

Ireland's Eye SPA

- 1.2.5.23 The HRA Stage 1 Screening Report (Document Reference E1.4) could not rule out the risk of LSE on the Ireland's Eye SPA. The impacts of the Mona Offshore Wind Project have been assessed with respect to the conservation objectives of this site. Seabird species that are qualifying features of this European site, and were screened into assessment include:
- Black-legged kittiwake
- 1.2.5.24 The HRA Stage 2 ISAA Part 3 – SPA and Ramsar site assessments (Document Reference E1.3) assessed the following impacts:
- Disturbance and displacement from airborne sound and presence of vessels and infrastructure
 - Collision risk
 - In-combination effects.

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1.2.5.25 Based on the evidence set out in this report the assessment concluded that the conservation objectives for the site would not be undermined and there would be no adverse effect on the integrity of the Ireland's Eye SPA as a result of the Mona Offshore Wind Project alone, or in combination with other plans and projects.

Copeland Islands SPA

1.2.5.26 The HRA Stage 1 Screening Report (Document Reference E1.4) could not rule out the risk of LSE on the Copeland Islands SPA. The impacts of the Mona Offshore Wind Project have been assessed with respect to the conservation objectives of this site. Seabird species that are qualifying features of this European site, and were screened into assessment include:

- Manx shearwater.

1.2.5.27 The HRA Stage 2 ISAA Part 3 – SPA and Ramsar site assessments (Document Reference E1.3) assessed the following impacts:

- Disturbance and displacement from airborne sound and presence of vessels and infrastructure
- In-combination effects.

1.2.5.28 Based on the evidence set out in this report the assessment concluded that the conservation objectives for the site would not be undermined and there would be no adverse effect on the integrity of the Copeland Islands SPA as a result of the Mona Offshore Wind Project alone, or in combination with other plans and projects.

Ailsa Craig SPA

1.2.5.29 The HRA Stage 1 Screening Report (Document Reference E1.4) could not rule out the risk of LSE on the Ailsa Craig SPA. The impacts of the Mona Offshore Wind Project have been assessed with respect to the conservation objectives of this site. Seabird species that are qualifying features of this European site, and were screened into assessment include:

- Northern gannet
- Common guillemot (non-breeding season only).

1.2.5.30 The HRA Stage 2 ISAA Part 3 – SPA and Ramsar site assessments (Document Reference E1.3) assessed the following impacts:

- Disturbance and displacement from airborne sound and presence of vessels and infrastructure
- Collision risk (northern gannet only)
- In-combination effects.

1.2.5.31 Based on the evidence set out in this report the assessment concluded that the conservation objectives for the site would not be undermined and there would be no adverse effect on the integrity of the Ailsa Craig SPA as a result of the Mona Offshore Wind Project alone, or in combination with other plans and projects.

Rathlin Island SPA

1.2.5.32 The HRA Stage 1 Screening Report (Document Reference E1.4) could not rule out the risk of LSE on the Rathlin Island SPA. The impacts of the Mona Offshore Wind Project

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have been assessed with respect to the conservation objectives of this site. Seabird species that are qualifying features of this European site, and were screened into assessment include:

- Black-legged kittiwake
- Common guillemot (non-breeding season only)
- Razorbill (non-breeding season only).

1.2.5.33 The HRA Stage 2 ISAA Part 3 – SPA and Ramsar site assessments (Document Reference E1.3) assessed the following impacts:

- Disturbance and displacement from airborne sound and presence of vessels and infrastructure
- Collision risk (black-legged kittiwake only)
- In-combination effects.

1.2.5.34 Based on the evidence set out in this report the assessment concluded that the conservation objectives for the site would not be undermined and there would be no adverse effect on the integrity of the Rathlin Island SPA as a result of the Mona Offshore Wind Project alone, or in combination with other plans and projects.

Skomer, Skokholm and the Seas off Pembrokeshire/Sgomer, Sgogwm a Moroedd Penfro SPA

1.2.5.35 The HRA Stage 1 Screening Report (Document Reference E1.4) could not rule out the risk of LSE on the Skomer, Skokholm and the Seas off Pembrokeshire/Sgomer, Sgogwm a Moroedd Penfro SPA. The impacts of the Mona Offshore Wind Project have been assessed with respect to the conservation objectives of this site. Seabird species that are qualifying features of this European site, and were screened into assessment include:

- Manx shearwater
- Common guillemot (non-breeding season only)
- Razorbill (non-breeding season only).

1.2.5.36 The HRA Stage 2 ISAA Part 3 – SPA and Ramsar site assessments (Document Reference E1.3) assessed the following impacts:

- Disturbance and displacement from airborne sound and presence of vessels and infrastructure
- In-combination effects.

1.2.5.37 Based on the evidence set out in this report the assessment concluded that the conservation objectives for the site would not be undermined and there would be no adverse effect on the integrity of the Skomer, Skokholm and the Seas off Pembrokeshire/Sgomer, Sgogwm a Moroedd Penfro SPA as a result of the Mona Offshore Wind Project alone, or in combination with other plans and projects.

Grassholm SPA

1.2.5.38 The HRA Stage 1 Screening Report (Document Reference E1.4) could not rule out the risk of LSE on the Grassholm SPA. The impacts of the Mona Offshore Wind Project have been assessed with respect to the conservation objectives of this site. Seabird

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species that are qualifying features of this European site, and were screened into assessment include:

- Northern gannet.

1.2.5.39 The HRA Stage 2 ISAA Part 3 – SPA and Ramsar site assessments (Document Reference E1.3) assessed the following impacts:

- Disturbance and displacement from airborne sound and presence of vessels and infrastructure
- Collision risk
- In-combination effects.

1.2.5.40 Based on the evidence set out in this report the assessment concluded that the conservation objectives for the site would not be undermined and there would be no adverse effect on the integrity of the Grassholm SPA as a result of the Mona Offshore Wind Project alone, or in combination with other plans and projects.

Saltee Islands SPA

1.2.5.41 The HRA Stage 1 Screening Report (Document Reference E1.4) could not rule out the risk of LSE on the Saltee Islands SPA. The impacts of the Mona Offshore Wind Project have been assessed with respect to the conservation objectives of this site. Seabird species that are qualifying features of this European site, and were screened into assessment include:

- Northern gannet.

1.2.5.42 The HRA Stage 2 ISAA Part 3 – SPA and Ramsar site assessments (Document Reference E1.3) assessed the following impacts:

- Disturbance and displacement from airborne sound and presence of vessels and infrastructure
- Collision risk
- In-combination effects.

1.2.5.43 Based on the evidence set out in this report the assessment concluded that the conservation objectives for the site would not be undermined and there would be no adverse effect on the integrity of the Saltee Islands SPA as a result of the Mona Offshore Wind Project alone, or in combination with other plans and projects.

Flamborough and Filey Coast SPA

1.2.5.44 The HRA Stage 1 Screening Report (Document Reference E1.4) could not rule out the risk of LSE on the Flamborough and Filey Coast SPA. The impacts of the Mona Offshore Wind Project have been assessed with respect to the conservation objectives of this site. Seabird species that are qualifying features of this European site, and were screened into assessment include:

- Black-legged kittiwake (non-breeding season only).

1.2.5.45 The HRA Stage 2 ISAA Part 3 – SPA and Ramsar site assessments (Document Reference E1.3) assessed the following impacts:

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- Disturbance and displacement from airborne sound and presence of vessels and infrastructure
- Collision risk
- In-combination effects.

1.2.5.46 Based on the evidence set out in this report the assessment concluded that the conservation objectives for the site would not be undermined and there would be no adverse effect on the integrity of the Flamborough and Filey Coast SPA as a result of the Mona Offshore Wind Project alone, or in combination with other plans and projects.

North Colonsay and Western Cliffs SPA

1.2.5.47 The HRA Stage 1 Screening Report (Document Reference E1.4) could not rule out the risk of LSE on the North Colonsay and Western Cliffs SPA. The impacts of the Mona Offshore Wind Project have been assessed with respect to the conservation objectives of this site. Seabird species that are qualifying features of this European site, and were screened into assessment include:

- Black-legged kittiwake
- Common guillemot (non-breeding season only).

1.2.5.48 The HRA Stage 2 ISAA Part 3 – SPA and Ramsar site assessments (Document Reference E1.3) assessed the following impacts:

- Disturbance and displacement from airborne sound and presence of vessels and infrastructure
- Collision risk (black-legged kittiwake only)
- In-combination effects.

1.2.5.49 Based on the evidence set out in this report the assessment concluded that the conservation objectives for the site would not be undermined and there would be no adverse effect on the integrity of the North Colonsay and Western Cliffs SPA as a result of the Mona Offshore Wind Project alone, or in combination with other plans and projects.

Rum SPA

1.2.5.50 The HRA Stage 1 Screening Report (Document Reference E1.4) could not rule out the risk of LSE on the Rum SPA. The impacts of the Mona Offshore Wind Project have been assessed with respect to the conservation objectives of this site. Seabird species that are qualifying features of this European site, and were screened into assessment include:

- Manx shearwater.

1.2.5.51 The HRA Stage 2 ISAA Part 2– SPA assessments (Document Reference E1.3) assessed the following impacts:

- Disturbance and displacement from airborne sound and presence of vessels and infrastructure
- In-combination effects.

1.2.5.52 Based on the evidence set out in this report the assessment concluded that the conservation objectives for the site would not be undermined and there would be no

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adverse effect on the integrity of the Rum SPA as a result of the Mona Offshore Wind Project alone, or in combination with other plans and projects.

Fowlsheugh SPA

1.2.5.53 The HRA Stage 1 Screening Report (Document Reference E1.4) could not rule out the risk of LSE on the Fowlsheugh SPA. The impacts of the Mona Offshore Wind Project have been assessed with respect to the conservation objectives of this site. Seabird species that are qualifying features of this European site, and were screened into assessment include:

- Black-legged kittiwake (non-breeding season only).

1.2.5.54 The HRA Stage 2 ISAA Part 3 – SPA and Ramsar site assessments (Document Reference E1.3) assessed the following impacts:

- Disturbance and displacement from airborne sound and presence of vessels and infrastructure
- Collision risk
- In-combination effects.

1.2.5.55 Based on the evidence set out in this report the assessment concluded that the conservation objectives for the site would not be undermined and there would be no adverse effect on the integrity of the Fowlsheugh SPA as a result of the Mona Offshore Wind Project alone, or in combination with other plans and projects.

Mingulay and Berneray SPA

1.2.5.56 The HRA Stage 1 Screening Report (Document Reference E1.4) could not rule out the risk of LSE on the Mingulay and Berneray SPA. The impacts of the Mona Offshore Wind Project have been assessed with respect to the conservation objectives of this site. Seabird species that are qualifying features of this European site, and were screened into assessment include:

- Common guillemot (non-breeding season only)
- Razorbill (non-breeding season only).

1.2.5.57 The HRA Stage 2 ISAA Part 3 – SPA and Ramsar site assessments (Document Reference E1.3) assessed the following impacts:

- Disturbance and displacement from airborne sound and presence of vessels and infrastructure
- In-combination effects.

1.2.5.58 Based on the evidence set out in this report the assessment concluded that the conservation objectives for the site would not be undermined and there would be no adverse effect on the integrity of the Mingulay and Berneray SPA as a result of the Mona Offshore Wind Project alone, or in combination with other plans and projects.

Canna and Sanday SPA

1.2.5.59 The HRA Stage 1 Screening Report (Document Reference E1.4) could not rule out the risk of LSE on the Canna and Sanday SPA. The impacts of the Mona Offshore Wind Project have been assessed with respect to the conservation objectives of this site.

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Seabird species that are qualifying features of this European site, and were screened into assessment include:

- Black-legged kittiwake (non-breeding season only).

1.2.5.60 The HRA Stage 2 ISAA Part 3 – SPA and Ramsar site assessments (Document Reference E1.3) assessed the following impacts:

- Disturbance and displacement from airborne sound and presence of vessels and infrastructure
- Collision risk
- In-combination effects.

1.2.5.61 Based on the evidence set out in this report the assessment concluded that the conservation objectives for the site would not be undermined and there would be no adverse effect on the integrity of the Canna and Sanday SPA as a result of the Mona Offshore Wind Project alone, or in combination with other plans and projects.

Isles of Scilly SPA

1.2.5.62 The HRA Stage 1 Screening Report (Document Reference E1.4) could not rule out the risk of LSE on the Isle of Scilly SPA. The impacts of the Mona Offshore Wind Project have been assessed with respect to the conservation objectives of this site. Seabird species that are qualifying features of this European site, and were screened into assessment include:

- Great black-backed gull (non-breeding season only).

1.2.5.63 The HRA Stage 2 ISAA Part 3 – SPA and Ramsar site assessments (Document Reference E1.3) assessed the following impacts:

- Collision risk
- In-combination effects.

1.2.5.64 Based on the evidence set out in this report the assessment concluded that the conservation objectives for the site would not be undermined and there would be no adverse effect on the integrity of the Isles of Scilly SPA as a result of the Mona Offshore Wind Project alone, or in combination with other plans and projects.

Buchan Ness to Collieston SPA

1.2.5.65 The HRA Stage 1 Screening Report (Document Reference E1.4) could not rule out the risk of LSE on the Buchan Ness to Collieston SPA. The impacts of the Mona Offshore Wind Project have been assessed with respect to the conservation objectives of this site. Seabird species that are qualifying features of this European site, and were screened into assessment include:

- Black-legged kittiwake (non-breeding season only).

1.2.5.66 The HRA Stage 2 ISAA Part 3 – SPA and Ramsar site assessments (Document Reference E1.3) assessed the following impacts:

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- Disturbance and displacement from airborne sound and presence of vessels and infrastructure
- Collision risk
- In-combination effects.

1.2.5.67 Based on the evidence set out in this report the assessment concluded that the conservation objectives for the site would not be undermined and there would be no adverse effect on the integrity of the Buchan Ness to Collieston SPA as a result of the Mona Offshore Wind Project alone, or in combination with other plans and projects.

Troup, Pennan and Lions Head SPA

1.2.5.68 The HRA Stage 1 Screening Report (Document Reference E1.4) could not rule out the risk of LSE on the Troup, Pennan and Lions Head SPA. The impacts of the Mona Offshore Wind Project have been assessed with respect to the conservation objectives of this site. Seabird species that are qualifying features of this European site, and were screened into assessment include:

- Black-legged kittiwake (non-breeding season only).

1.2.5.69 The HRA Stage 2 ISAA Part 3 – SPA and Ramsar site assessments (Document Reference E1.3) assessed the following impacts:

- Disturbance and displacement from airborne sound and presence of vessels and infrastructure
- Collision risk
- In-combination effects.

1.2.5.70 Based on the evidence set out in this report the assessment concluded that the conservation objectives for the site would not be undermined and there would be no adverse effect on the integrity of the Troup, Pennan and Lions Head SPA as a result of the Mona Offshore Wind Project alone, or in combination with other plans and projects.

Shiant Isles SPA

1.2.5.71 The HRA Stage 1 Screening Report (Document Reference E1.4) could not rule out the risk of LSE on the Shiant Isles SPA. The impacts of the Mona Offshore Wind Project have been assessed with respect to the conservation objectives of this site. Seabird species that are qualifying features of this European site, and were screened into assessment include:

- Razorbill (non-breeding season only).

1.2.5.72 The HRA Stage 2 ISAA Part 3 – SPA and Ramsar site assessments (Document Reference E1.3) assessed the following impacts:

- Disturbance and displacement from airborne sound and presence of vessels and infrastructure
- In-combination effects.

1.2.5.73 Based on the evidence set out in this report the assessment concluded that the conservation objectives for the site would not be undermined and there would be no adverse effect on the integrity of the Shiant Isles SPA as a result of the Mona Offshore Wind Project alone, or in combination with other plans and projects.

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East Caithness Cliffs SPA

- 1.2.5.74 The HRA Stage 1 Screening Report (Document Reference E1.4) could not rule out the risk of LSE on the East Caithness Cliffs SPA. The impacts of the Mona Offshore Wind Project have been assessed with respect to the conservation objectives of this site. Seabird species that are qualifying features of this European site, and were screened into assessment include:
- Black-legged kittiwake (non-breeding season only).
- 1.2.5.75 The HRA Stage 2 ISAA Part 3 – SPA and Ramsar site assessments (Document Reference E1.3) assessed the following impacts:
- Disturbance and displacement from airborne sound and presence of vessels and infrastructure
 - Collision risk
 - In-combination effects.
- 1.2.5.76 Based on the evidence set out in this report the assessment concluded that the conservation objectives for the site would not be undermined and there would be no adverse effect on the integrity of the East Caithness Cliffs SPA as a result of the Mona Offshore Wind Project alone, or in combination with other plans and projects.

Handa SPA

- 1.2.5.77 The HRA Stage 1 Screening Report (Document Reference E1.4) could not rule out the risk of LSE on the Handa SPA. The impacts of the Mona Offshore Wind Project have been assessed with respect to the conservation objectives of this site. Seabird species that are qualifying features of this European site, and were screened into assessment include:
- Common guillemot (non-breeding season only)
 - Razorbill (non-breeding season only).
- 1.2.5.78 The HRA Stage 2 ISAA Part 3 – SPA and Ramsar site assessments (Document Reference E1.3) assessed the following impacts:
- Disturbance and displacement from airborne sound and presence of vessels and infrastructure
 - In-combination effects.
- 1.2.5.79 Based on the evidence set out in this report the assessment concluded that the conservation objectives for the site would not be undermined and there would be no adverse effect on the integrity of the Handa SPA as a result of the Mona Offshore Wind Project alone, or in combination with other plans and projects.

St Kilda SPA

- 1.2.5.80 The HRA Stage 1 Screening Report (Document Reference E1.4) could not rule out the risk of LSE on the St Kilda SPA. The impacts of the Mona Offshore Wind Project have been assessed with respect to the conservation objectives of this site. Seabird species that are qualifying features of this European site, and were screened into assessment include:

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- Common guillemot (non-breeding season only)
- Northern gannet.

1.2.5.81 The HRA Stage 2 ISAA Part 3 – SPA and Ramsar site assessments (Document Reference E1.3) assessed the following impacts:

- Disturbance and displacement from airborne sound and presence of vessels and infrastructure
- Collision risk (Northern gannet only)
- In-combination effects.

1.2.5.82 Based on the evidence set out in this report the assessment concluded that the conservation objectives for the site would not be undermined and there would be no adverse effect on the integrity of the St Kilda SPA as a result of the Mona Offshore Wind Project alone, or in combination with other plans and projects.

Cape Wrath SPA

1.2.5.83 The HRA Stage 1 Screening Report (Document Reference E1.4) could not rule out the risk of LSE on the Cape Wrath SPA. The impacts of the Mona Offshore Wind Project have been assessed with respect to the conservation objectives of this site. Seabird species that are qualifying features of this European site, and were screened into assessment include:

- Black-legged kittiwake (non-breeding season only)
- Common guillemot (non-breeding season only)
- Razorbill (non-breeding season only).

1.2.5.84 The HRA Stage 2 ISAA Part 3 – SPA and Ramsar site assessments (Document Reference E1.3) assessed the following impacts:

- Disturbance and displacement from airborne sound and presence of vessels and infrastructure
- Collision risk (black legged kittiwake only)
- In-combination effects.

1.2.5.85 Based on the evidence set out in this report the assessment concluded that the conservation objectives for the site would not be undermined and there would be no adverse effect on the integrity of the Cape Wrath SPA as a result of the Mona Offshore Wind Project alone, or in combination with other plans and projects.

Flannan Isles SPA

1.2.5.86 The HRA Stage 1 Screening Report (Document Reference E1.4) could not rule out the risk of LSE on the Flannan Isles SPA. The impacts of the Mona Offshore Wind Project have been assessed with respect to the conservation objectives of this site. Seabird species that are qualifying features of this European site, and were screened into assessment include:

- Common guillemot (non-breeding season only).

1.2.5.87 The HRA Stage 2 ISAA Part 3 – SPA and Ramsar site assessments (Document Reference E1.3) assessed the following impacts:

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- Disturbance and displacement from airborne sound and presence of vessels and infrastructure
- In-combination effects.

1.2.5.88 Based on the evidence set out in this report the assessment concluded that the conservation objectives for the site would not be undermined and there would be no adverse effect on the integrity of the Flannan Isles SPA as a result of the Mona Offshore Wind Project alone, or in combination with other plans and projects.

North Caithness Cliffs SPA

1.2.5.89 The HRA Stage 1 Screening Report (Document Reference E1.4) could not rule out the risk of LSE on the North Caithness Cliffs SPA. The impacts of the Mona Offshore Wind Project have been assessed with respect to the conservation objectives of this site. Seabird species that are qualifying features of this European site, and were screened into assessment include:

- Black-legged kittiwake (non-breeding season only).

1.2.5.90 The HRA Stage 2 ISAA Part 3 – SPA and Ramsar site assessments (Document Reference E1.3) assessed the following impacts:

- Disturbance and displacement from airborne sound and presence of vessels and infrastructure
- Collision risk
- In-combination effects.

1.2.5.91 Based on the evidence set out in this report the assessment concluded that the conservation objectives for the site would not be undermined and there would be no adverse effect on the integrity of the North Caithness Cliffs SPA as a result of the Mona Offshore Wind Project alone, or in combination with other plans and projects.

Sule Skerry and Sule Stack SPA

1.2.5.92 The HRA Stage 1 Screening Report (Document Reference E1.4) could not rule out the risk of LSE on the Sule Skerry and Sule Stack SPA. The impacts of the Mona Offshore Wind Project have been assessed with respect to the conservation objectives of this site. Seabird species that are qualifying features of this European site, and were screened into assessment include:

- Common guillemot (non-breeding season only).

1.2.5.93 The HRA Stage 2 ISAA Part 3 – SPA and Ramsar site assessments (Document Reference E1.3) assessed the following impacts:

- Disturbance and displacement from airborne sound and presence of vessels and infrastructure
- In-combination effects.

1.2.5.94 Based on the evidence set out in this report the assessment concluded that the conservation objectives for the site would not be undermined and there would be no adverse effect on the integrity of the Sule Skerry and Sule Stack SPA as a result of the Mona Offshore Wind Project alone, or in combination with other plans and projects.

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North Rona and Sula Sgeir SPA

- 1.2.5.95 The HRA Stage 1 Screening Report (Document Reference E1.4) could not rule out the risk of LSE on the North Rona and Sula Sgeir SPA. The impacts of the Mona Offshore Wind Project have been assessed with respect to the conservation objectives of this site. Seabird species that are qualifying features of this European site, and were screened into assessment include:
- Common guillemot (non-breeding season only).
- 1.2.5.96 The HRA Stage 2 ISAA Part 3 – SPA and Ramsar site assessments (Document Reference E1.3) assessed the following impacts:
- Disturbance and displacement from airborne sound and presence of vessels and infrastructure
 - In-combination effects.
- 1.2.5.97 Based on the evidence set out in this report the assessment concluded that the conservation objectives for the site would not be undermined and there would be no adverse effect on the integrity of the North Rona and Sula Sgeir SPA as a result of the Mona Offshore Wind Project alone, or in combination with other plans and projects.

West Westray

- 1.2.5.98 The HRA Stage 1 Screening Report (Document Reference E1.4) could not rule out the risk of LSE on the West Westray SPA. The impacts of the Mona Offshore Wind Project have been assessed with respect to the conservation objectives of this site. Seabird species that are qualifying features of this European site, and were screened into assessment include:
- Black-legged kittiwake (non-breeding season only).
- 1.2.5.99 The HRA Stage 2 ISAA Part 3 – SPA and Ramsar site assessments (Document Reference E1.3) assessed the following impacts:
- Disturbance and displacement from airborne sound and presence of vessels and infrastructure
 - Collision risk
 - In-combination effects.
- 1.2.5.100 Based on the evidence set out in this report the assessment concluded that the conservation objectives for the site would not be undermined and there would be no adverse effect on the integrity of the West Westray SPA as a result of the Mona Offshore Wind Project alone, or in combination with other plans and projects.

1.3 Introduction

1.3.1 Overview

- 1.3.1.1 Mona Offshore Wind Limited (the Applicant), a joint venture of bp Alternative Energy Investments (hereafter referred to as bp) and Energie Baden-Württemberg AG (hereafter referred to as EnBW (Energie Baden-Württemberg)) is developing the Mona Offshore Wind Project (Figure 1.1). The Mona Offshore Wind Project is a proposed offshore wind farm located in the east Irish Sea.

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- 1.3.1.2 This Habitats Regulations Assessment (HRA) Stage 2 Information to Support an Appropriate Assessment (ISAA) has been prepared for the Mona Offshore Wind Project. The Mona Offshore Wind Project includes both the offshore and onshore infrastructure required to generate and transmit electricity from the offshore wind turbines to an onshore National Grid substation.
- 1.3.1.3 As the Mona Offshore Wind Project is an offshore generating station with a capacity of greater than 350 MW located in Welsh waters, it is a Nationally Significant Infrastructure Project (NSIP) as defined by Section 15(3) of the Planning Act 2008 (as amended) (the 2008 Act). There is therefore a requirement to submit an application for a Development Consent Order (DCO) to the Planning Inspectorate to be decided by the Secretary of State for the Department for Energy Security and Net Zero.
- 1.3.1.4 A marine licence is required before carrying out any licensable marine activity under the Marine and Coastal Access Act 2009. Marine licences can be deemed under the DCO for licensable activities in Welsh offshore waters. As agreed with Natural Resources Wales (NRW), the marine licence for all licensable activities related to the offshore wind farm generation infrastructure (wind turbines, Offshore Substation Platforms (OSPs), inter-array cables and interconnector cables) located within the Mona Array Area will be deemed under the DCO. However, licensable activities within 12 nm of the Welsh coast require a separate marine licence. A separate application will therefore be made to NRW for a marine licence for the offshore export cables and related works located within the Mona Array Area and the Mona Offshore Cable Corridor and Access Areas.
- 1.3.1.5 This HRA Stage 2 ISAA has been prepared for the DCO and marine licence applications alongside the Environmental Statement.

1.3.2 Overview of the Mona Offshore Wind Project

- 1.3.2.1 An overview of the Mona Offshore Wind Project is outlined in the paragraphs below and the full project description is provided in Volume 1, Chapter 3: Project description of the Environmental Statement (Document Reference F1.3).
- 1.3.2.2 The Mona Offshore Wind Project will be located in the east Irish Sea, with a landfall on the North Wales coastline and a connection to the existing Bodelwyddan National Grid substation. The key components of the Mona Offshore Wind Project include:
- **Mona Array Area:** This is where the wind turbines, OSPs, foundations (for both wind turbines and OSPs), inter-array cables, interconnector cables and offshore export cables will be located
 - **Mona Offshore Cable Corridor and Access Areas:** The corridor located between the Mona Array Area and the landfall up to MHWS, in which the offshore export cables will be located and in which the intertidal access areas are located
 - **Intertidal access areas:** The area from MHWS to MLWS which will be used for access to the beach and construction related activities
 - **Landfall:** This is where the offshore export cables make contact with land and the transitional area where the offshore cabling connects to the onshore cabling
 - **Mona Onshore Development Area:** The area in which the landfall, onshore cable corridor, onshore substation, mitigation areas, temporary construction facilities (such as access roads and construction compounds), and the connection to National Grid infrastructure will be located

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- **Mona Onshore Substation:** This is where the new substation will be located, containing the components for transforming the power supplied from the offshore wind farm up to 400 kV
- **Mona 400 kV Grid Connection Cable Corridor:** The corridor from the Mona onshore substation to the National Grid substation.

1.3.2.3 The Mona Offshore Wind Project will consist of up to 96 wind turbines. The maximum proposed number of turbines has been reduced from 107 proposed in the Preliminary Environmental Impact Report (PEIR). The final capacity of the Mona Offshore Wind Project will be determined based on available technology and constrained by the design envelope of the wind turbines. The offshore infrastructure will also include up to 360 km of offshore export cables, 50 km of interconnector cables and 325 km of inter-array cables.

1.3.2.4 The onshore infrastructure will consist of up to 12 onshore export cables buried in up to four trenches and an onshore High Voltage Alternating Current (HVAC) substation to allow the power to be transferred to the National Grid via the existing Bodelwyddan National Grid Substation.

1.3.2.5 The key components of the Mona Offshore Wind Project are shown in Figure 1.2 and presented in Table 1.1.

1.3.2.6 The Applicant intends to commence construction of the Mona Offshore Wind Project in 2026 and for it to be fully operational by 2030 in order to help meet UK and Welsh Government renewable energy targets.

1.3.2.7 Although The Crown Estate (TCE) lease for the Mona Offshore Wind Project is 60 years, the design life of the Mona Offshore Wind Project is expected to be 35 years.

Table 1.1: Key parameters for the Mona Offshore Wind Project.

Parameter	Value
Mona Array Area (km ²)	300
Average water depth (m Lowest Astronomical Tide (LAT))	-39.39
Maximum number of wind turbines	96
Maximum blade tip height above LAT (m)	364
Maximum number of OSPs	4
Maximum number of offshore export cables	4
Maximum number of onshore export cables	12
Maximum number of trenches for onshore export cables	4
Maximum length of inter-array cables (km)	325
Maximum length of interconnector cables (km)	50
Maximum length of offshore export cables (km)	360
Maximum length of onshore export cables (km)	15
Maximum length of 400 kV grid connection cables (km)	3

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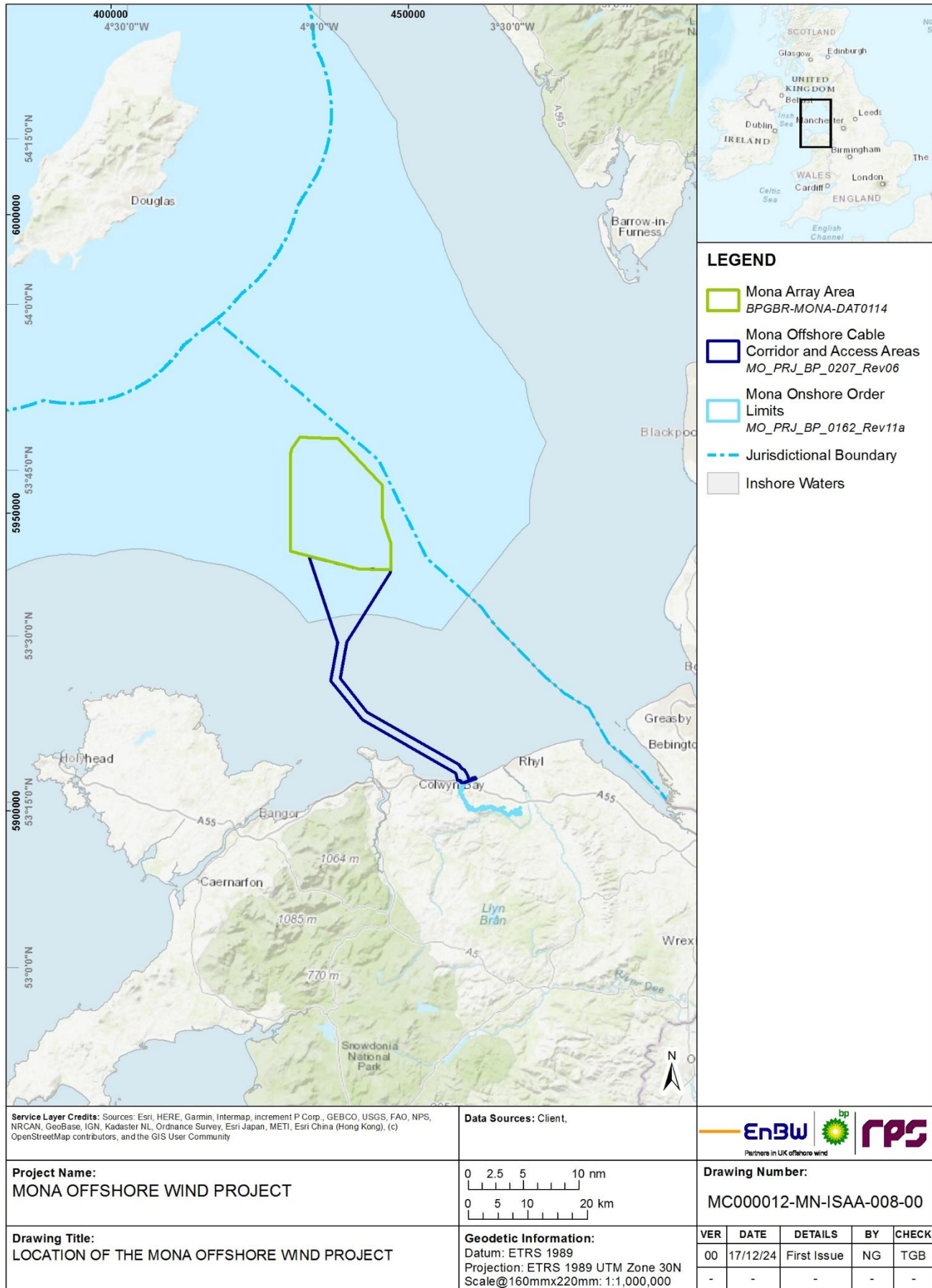


Figure 1.1: Location of the Mona Offshore Wind Project.

MONA OFFSHORE WIND PROJECT

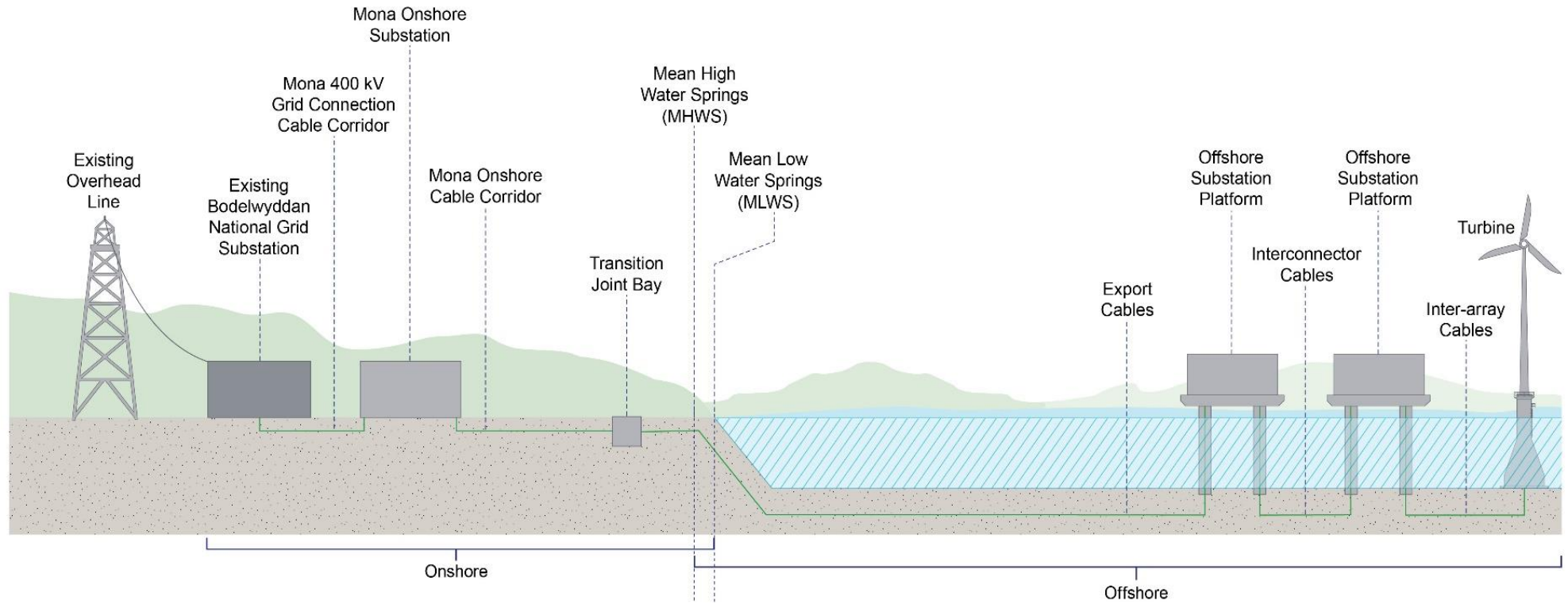


Figure 1.2: Overview of the Mona Offshore Wind Project infrastructure.

1.3.3 Overview of the Habitats Regulations Assessment

- 1.3.3.1 The requirement and process for the consideration of potential impacts of plans and projects on European sites have followed the European Union's (EU) Habitats Directive (Directive 92/43/EEC). In terrestrial areas of the UK and territorial waters out to 12 nm, the land and marine aspects of Habitats Directive and certain elements of the Wild Birds Directive (Directive 2009/147/EC) are transposed into UK law through The Conservation of Habitats and Species Regulations 2017 as amended by the Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019. In waters beyond 12 nm, The Conservation of Offshore Marine Habitats and Species Regulations 2017 (the Offshore Habitats Regulations) apply, which transpose the Habitats and Birds Directives into national law. These regulations are together referred to as the Habitats Regulations.
- 1.3.3.2 Under the Habitats Regulations, an Appropriate Assessment must be carried out on all plans and projects that are likely to have a significant effect on a European site. European sites include Special Areas of Conservation (SACs), candidate SACs (cSACs), Sites of Community Importance (SCIs), Special Protection Areas (SPAs) and as a matter of policy (Defra, 2021), possible SACs (pSACs) and potential SPAs (pSPAs). In the UK, the requirements of the Habitats Regulations are also extended to consider the effects on Ramsar sites (listed under the Ramsar Convention on Wetlands of International Importance). These sites in the UK now form part of the National Site Network but the term 'European site' has been retained for sites protected in European Member States, England and Wales and the rest of the UK in accordance with guidance issued by the UK Government on the changes made by the Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019 to the Conservation of Habitats and Species Regulations 2017 (as amended) (Defra, 2021).
- 1.3.3.3 The Defra (2021) guidance outlines that the HRA process can have up the three stages, as outlined below, where the outcome of each successive stage determines whether a further stage in the process is required:
1. Screening - to check if the proposal is likely to have a significant effect on the site's conservation objectives
 2. Appropriate Assessment - to assess the likely significant effects of the proposal on the integrity of the site and its conservation objectives and to consider ways to avoid or minimise any effects
 3. Derogation - to consider if proposals that would have an adverse effect on a European site qualify for an exemption, subject to three legal tests being satisfied (i.e. alternative solutions, imperative reasons of overriding public interest and compensatory measures).
- 1.3.3.4 Further information on HRA methods, guidance and case law is provided in section 1.4.3.

1.3.4 Purpose of the ISAA

- 1.3.4.1 This HRA Stage 2 ISAA has been prepared by RPS, on behalf of the Applicant, to support the HRA under Section 63 of the Conservation of Habitats and Species Regulations 2017 as amended by the Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019 and Section 28 of the Conservation of Offshore Marine Habitats and Species Regulations 2017 for the Mona Offshore Wind Project.

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1.3.4.2 This HRA Stage 2 ISAA builds upon the HRA Stage 1 Screening Report (Document Reference E1.4) and considers whether the Mona Offshore Wind Project could have adverse effects, either alone or in-combination with other plans or projects, on the integrity of any European site. This report will provide the Competent Authority with the information required to undertake an HRA Stage 2 Appropriate Assessment (see section 1.4 for more detail on the HRA process).

1.3.4.3 The scope of this ISAA covers all relevant European sites and designated features where Likely Significant Effects (LSE) have been identified due to the potential impacts arising from the Mona Offshore Wind Project. This includes both 'offshore' European sites and features (seaward of Mean High Water Springs (MHWS)), and potential impacts of offshore and intertidal infrastructure seaward of MHWS and onshore infrastructure on 'onshore' European sites (landward of Mean Low Water Springs (MLWS)).

1.3.5 Key changes to the HRA Stage 2 ISAA since PEIR

1.3.5.1 The key changes to the HRA Stage 2 ISAA for the application for consent, since the draft HRA Stage 2 ISAA that accompanied the PEIR, are detailed below:

- Updates to the Maximum Design Scenarios (MDSs) used for assessments for the Mona Offshore Wind Project including updates to the Mona Offshore Wind Project Boundary and project parameters, outlined in the HRA Stage 2 ISAA Part 2 – SAC assessments (Document Reference E1.2) and HRA Stage 2 ISAA Part 3 – SPA and Ramsar Sites assessments (Document Reference E1.3)
- Inclusion of site-specific benthic subtidal survey data for the Mona Offshore Cable Corridor to inform the screening of features and impacts for SACs designated for Annex I habitats carried forward to the appropriate assessment in HRA Stage 2 ISAA Part 2 – SAC assessments (Document Reference E1.2)
- Inclusion of the outputs of the project-specific physical processes modelling in the HRA Stage 1 Screening Report (Document Reference E1.4) to refine the European sites with Annex I habitat and Annex II fish features carried forward to the appropriate assessment in the HRA Stage 2 ISAA Part 2 – SAC assessments (Document Reference E1.2)
- The updated conservation objectives for the Dee Estuary/Aber Dyfrdwy SAC and the Liverpool Bay/Bae Lerpwl SPA have been adopted in the HRA Stage 2 ISAA Part 2 – SAC assessments (Document Reference E1.2) and HRA Stage 2 ISAA Part 3 – SPA and Ramsar Sites assessments (Document Reference E1.3), as requested by NRW (see S42 responses included in the HRA Stage 2 ISAA Part 2 – SAC assessments (Document Reference E1.2) and the HRA Stage 2 ISAA Part 3 – SPA and Ramsar Sites assessments (Document Reference E1.3))
- Change to approach for assessment of underwater sound resulting from piling for Annex II marine mammals and use of the unweighted $143 \text{ dB}1\mu\text{Pa}^2\text{s}$ SEL_{SS} sound threshold in addition to Effective Deterrence Range (EDR) approach as requested by the Marine Mammals Expert Working Group (EWG).
- Change to the approach for the assessment of SPAs screened into the appropriate assessment in HRA Stage 2 ISAA Part 3 – SPA and Ramsar Sites assessments (Document Reference E1.3), as agreed with the Offshore Ornithology (EWG).

1.4 The Habitats Regulations Assessment process

1.4.1 Legislative context

1.4.1.1 The Habitats Directive (92/43/EEC) on the conservation of natural habitats and of wild fauna and flora, protects habitats and species of European nature conservation importance. Together with Council Directive (2009/147/EC) on the conservation of wild birds (the 'Birds Directive'), the Habitats Directive provide the EU's legal framework for the protection of wild fauna and flora and birds and establishes a network of internationally important sites, designated for their ecological status. This network of designated sites includes:

- SACs which are designated under the Habitats Directive and promote the protection of flora, fauna and habitats
- SPAs which are designated under the Birds Directive in order to protect rare, vulnerable and migratory birds.

1.4.1.2 In terrestrial areas of the UK and territorial waters out to 12 nm, the land and marine aspects of the Habitats Directive and certain elements of the Birds Directive are transposed into UK law through The Conservation of Habitats and Species Regulations 2017 (as amended). In waters beyond 12 nm, The Conservation of Offshore Marine Habitats and Species Regulations 2017 (the Offshore Habitats Regulations) apply, which transpose the Habitats and Birds Directives into national law.

1.4.1.3 The UK is no longer an EU Member State, but the Habitats Directive as implemented by the Habitats Regulations, continues to provide the legislative framework for HRA in the UK. The HRA process implemented under the Habitats Regulations continues to apply (subject to minor changes effected by the Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019 and the UK is bound by HRA judgments handed down by The Court of Justice of the European Union (CJEU) prior to 31 to December 2020¹.

1.4.1.4 The objective of the Habitats Regulations is to conserve, at a Favourable Conservation Status (FCS), those qualifying habitats and species and supporting habitats of qualifying species listed in Annexes I and II of the Habitats Directive and Annex I of the Birds Directive. Post EU Exit, the Habitats Regulations continue to refer to Annexes I and II of the Habitats Directive and Annex I of the Birds Directive and as such, reference is made to the annexes of the Habitats and Birds Directives in this HRA Stage 2 ISAA.

1.4.1.5 In addition to sites formally defined as European sites in the Habitats Regulations, UK Government policy (ODPM Circular 06/2005) states that Wetlands of International Importance listed and proposed under the Ramsar Convention 1971 (Ramsar sites) are afforded the same protection. As a matter of policy, the UK Government also affords sites going through the formal designation process (i.e. pSPAs, cSACs and pSACs), SCIs and potential Ramsar sites, the same level of protection.

1.4.1.6 Under the Habitats Regulations, before granting approval (i.e. planning permissions, licenses and consents) for a development likely to have a significant effect on an SAC or SPA/Ramsar site, an Appropriate Assessment must be made by the Competent

¹ The UK Supreme Court may depart from binding pre-EU Exit case law if they consider it 'right to do so' and the Inner House of the Court of Session may depart from such case law in certain circumstances

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Authority, of the proposed plan or project's potential for adverse effects on integrity of the site in view of that site's conservation objectives.

1.4.2 European sites (post EU exit)

1.4.2.1 European sites (SACs and SPAs) in the UK no longer form part of the EU's Natura 2000 ecological network. The changes made by the Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019 created a National Site Network on land and at sea, including both the inshore and offshore marine areas in the UK. The National Site Network comprises of European sites (SACs and SPAs) in the UK that already existed (i.e. were established under the Habitats or Birds Directives) on 31 December 2020 (or proposed to the European Commission (EC) before that date) and any new sites designated under the Habitats Regulations under an amended designation process.

1.4.2.2 Ramsar sites do not form part of the National Site Network. Many Ramsar sites overlap with SACs and SPAs and all Ramsar sites remain protected in the same way as SACs and SPAs.

1.4.3 The HRA process

1.4.3.1 Regulation 28 of the Conservation of Offshore Marine Habitats and Species Regulations 2017 (the Offshore Habitats Regulations) and Regulation 63 of the Conservation of Habitats and Species Regulations 2017, require that wherever a plan or project that is not directly connected to, or necessary for, the management of a European site is likely to have a significant effect on the conservation objectives of the site (directly, indirectly, alone or in-combination with other plans or projects), an 'Appropriate Assessment' of the implications of the plan or project for that site in view of that site's conservation objectives must be undertaken by the Competent Authority before consent or authorisation can be given for the plan or project.

1.4.3.2 The Habitats Regulations make it clear that the person applying for the consent of the plan or project must provide such information as the competent authority may reasonably require for the purposes of the assessment. This HRA Stage 2 ISAA provides this information.

1.4.3.3 HRA is a multi-stage process which helps to determine LSE, assesses adverse impact on the integrity of a European site, and examines alternative solutions and provides justification of Imperative Reasons of Overriding Public Interest (IROPI), as required. The Defra (2021) guidance describes that the process can have up to three stages as outlined below and shown in Figure 1.3:

- Screening - the first stage involves a screening for LSE which is a simple assessment to check or screen if, in the absence of mitigation, a proposal:
 - Is directly connected with or necessary for the conservation management of a European site
 - Risks having a significant effect on a European site on its own or in-combination with other proposals
- Appropriate Assessment - the second stage is an Appropriate Assessment, which must be carried out if it is decided that there is a risk of a LSE on a European site or if there is not enough evidence to rule out a risk (as required by Article 6(3) of the Habitats Directive). The Appropriate Assessment should assess the likely significant effects of a proposal on the integrity of the site and

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its conservation objectives and consider ways to avoid or reduce (mitigate) any potential for an 'adverse effect on the integrity of the site'

- Derogations - the third stage is known as a derogation (as outlined in Article 6(4) of the Habitats Directive) where, in certain circumstances, a proposal that has failed the integrity test may be allowed to go ahead. To decide if the proposal qualifies for a derogation, three legal tests must be applied. All three tests must be passed in sequence for a derogation to be granted:
 - There are no feasible alternative solutions that would be less damaging or avoid damage to the site
 - The proposal needs to be carried out for imperative reasons of overriding public interest
 - The necessary compensatory measures can be secured.

1.4.3.4 This HRA Stage 2 ISAA considers the second stage 'Appropriate Assessment' in the HRA process in Figure 1.1 which seeks to assess and decide whether the Mona Offshore Wind Project, alone or in combination with other projects or plans, will have an adverse effect on the integrity of a European site.

1.4.3.5 The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019 establish management objectives for the National Site Network. These are called the network objectives. The objectives in relation to the National Site Network are to:

- Maintain or restore certain habitats and species listed in the Habitats Directive to favourable conservation status
- Contribute to ensuring the survival and reproduction of certain species of wild bird in their area of distribution and to maintaining their populations at levels which correspond to ecological, scientific and cultural requirements, while taking account of economic and recreational requirements.

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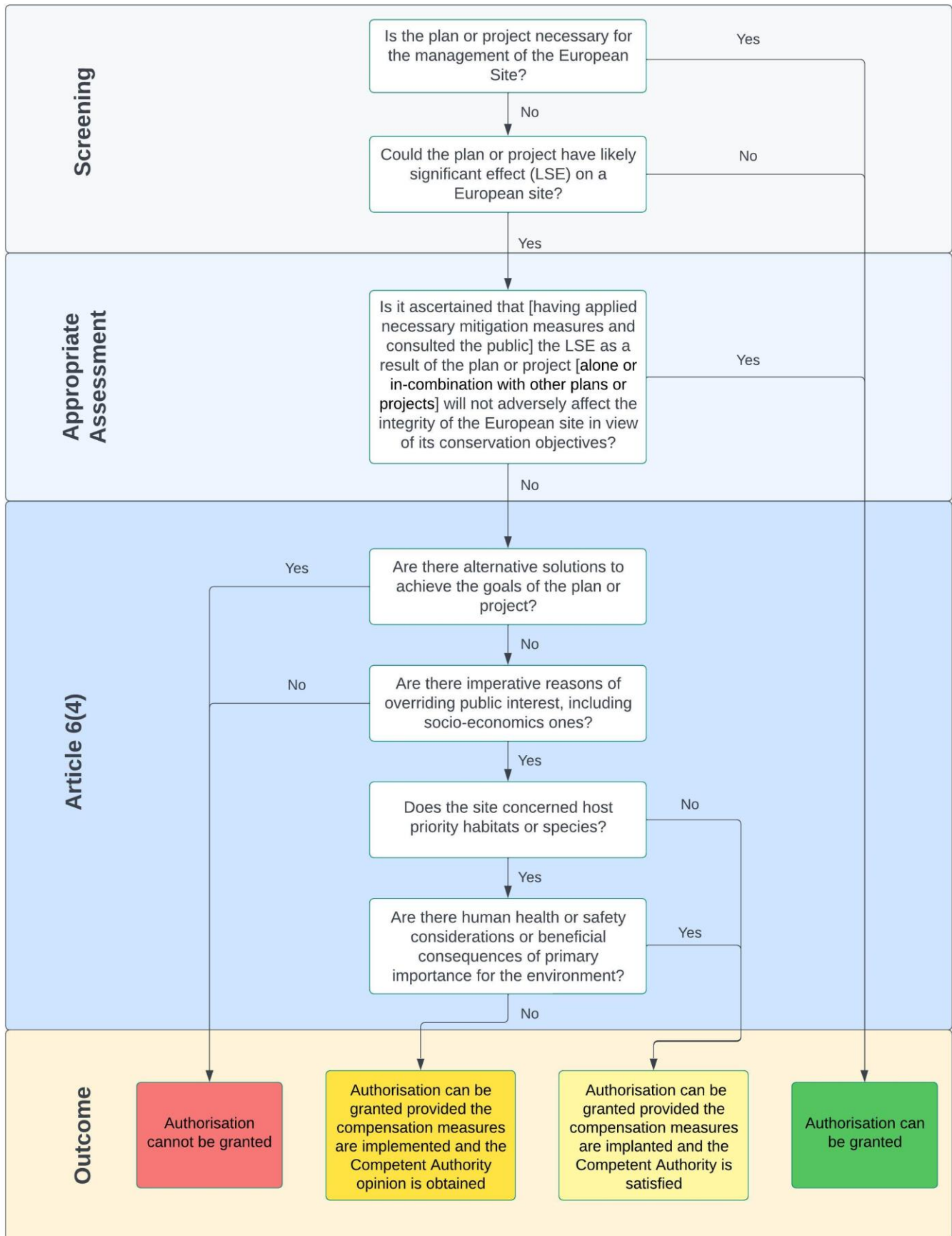


Figure 1.3: Stages in the HRA process (adapted from European Commission, 2021).

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1.4.4 The Crown Estate Plan-Level HRA

- 1.4.4.1 TCE, in its role as Competent Authority, has conducted a Plan-Level HRA for the Offshore Wind Leasing Round 4. The Plan-Level HRA assessed the potential impacts of the six potential offshore wind projects identified through the Offshore Wind Leasing Round 4, including the Mona Offshore Wind Project, on the National Site Network.
- 1.4.4.2 The Plan-Level HRA process involved engagement and consultation with an EWG consisting of relevant UK statutory marine planning authorities, Statutory Nature Conservation Bodies (SNCBs) and relevant non-governmental organisations.
- 1.4.4.3 TCE's Plan-Level HRA (TCE, 2022) concluded that the possibility of an adverse effect on site integrity as a result of the Offshore Wind Leasing Round 4 could not be ruled out for two protected sites forming part of the National Site Network. The two protected sites, and relevant features, are: 1) Sandbank features of the Dogger Bank SAC alone and in-combination; and 2) kittiwake feature of the Flamborough and Filey Coast SPA for in-combination effects only. The TCE Plan Level HRA states that where the assessment identifies risk of an adverse effect on integrity, options for mitigation that can be applied at the Plan-level will be considered. This could involve a modification to the Plan to reduce its impact or the specification of measures that would be made a condition of individual projects. Where the HRA identifies a potential adverse effect on integrity, only when it is sufficiently certain that mitigation would make an effective contribution to avoiding or reducing harm, can mitigation measures be considered as enabling a determination of no adverse effect on integrity to be concluded. It should be noted, however, that the Mona Offshore Wind Project was not identified as a preferred project required to be considered in the Appropriate Assessment by TCE for either of these sites. Therefore, no Adverse Effect on Site Integrity was identified for the Mona Offshore Wind Project in the Round 4 Plan-Level HRA.
- 1.4.4.4 On the basis of these conclusions, TCE considered derogation and concluded that: a) there are no alternative solutions to deliver the Offshore Wind Leasing Round 4 objectives; b) there are clear imperative reasons of overriding public interest to proceed under the government's targets for offshore wind and net-zero; and c) the Offshore Wind Leasing Round 4 provides a robust framework for the delivery of compensatory measures. TCE therefore considered that the three derogation tests have been met and the Secretary of State has since agreed that TCE can proceed with the plan, and Welsh Ministers have not raised any objection to the notice. As discussed in paragraph 1.4.4.3, it should be noted that the Mona Offshore Wind Project was not identified as a preferred project required to be considered in the Appropriate Assessment by TCE for either of the sites outlined in paragraph 1.4.4.3 above. Therefore, no adverse effect on integrity was identified for the Mona Offshore Wind Project in the Round 4 Plan-Level HRA.
- 1.4.4.5 The Plan-Level HRA notes that TCE expects developers to undertake project-specific environmental assessments - including a detailed project-level HRA - as part of their application for development consent. This document comprises Stage 2 of the HRA, which carries out the Appropriate Assessment of the Mona Offshore Wind Project with respect to its potential to have an adverse effect on integrity on European sites. This HRA Stage 2 ISAA has taken into account the information and approach taken by the Plan Level HRA as set out below in paragraph 1.4.5.1.

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1.4.5 Guidance

1.4.5.1 This HRA Stage 2 ISAA has drawn upon a number of information sources, HRA principles, regulations and guidance documents, including:

- EC (2006) Nature and Biodiversity Cases Ruling of the European Court of Justice
- EC (2007) Guidance document on Article 6(4) of the 'Habitats Directive' 92/43/EE. Clarification on the Concepts of: Alternative Solutions, Imperative Reasons of Overriding Public Interest, Compensatory Measures, Overall Coherence, Opinion of the Commission
- EC (2018) Managing Natura 2000 sites. The provisions of Article 6 of the 'Habitats' Directive 92/43/EEC'
- EC (2020) Guidance document on wind energy developments and EU nature legislation. European Commission Notice Brussels (2020) 7730 final
- EC (2021) Assessment of plans and projects in relation to Natura 2000 sites - Methodological guidance on Article 6(3) and (4) of the Habitats Directive 92/43/EEC. European Commission Notice Brussels C(2021) 6913 final
- Joint Defra, Welsh Government, Natural England and Natural Resources Wales guidance (2021) 'Habitats regulations assessments: protecting a European site'
- The Planning Inspectorate Advice Note ten: Habitats Regulations Assessment relevant to nationally significant infrastructure projects (The Planning Inspectorate, 2022)
- The Planning Inspectorate Advice Note Seventeen: Cumulative effects assessment relevant to nationally significant infrastructure projects (The Planning Inspectorate, 2019)
- The Habitats Regulations Assessment Handbook (DTA Publications Limited, 2016)
- TCE Plan Level HRA (TCE, 2022)
- Feedback received from the Mona Offshore Wind Project and Morgan Offshore Wind Project (hereafter referred to as 'Morgan Generation Assets') Evidence Plan Process to date (see section 1.5).

1.4.6 Case law relevant to the ISAA

Consideration of mitigation measures

1.4.6.1 In Case C-323/17 People Over Wind, Peter Sweetman v Coillte Teoranta [2018] Ecr I-244, the CJEU ruled that mitigation measures could not be taken into account at the screening stage. The approach taken in the HRA Stage 1 Screening Report for the Mona Offshore Wind Project complied with this judgement and no mitigation measures were considered at the HRA Stage 1 Screening stage.

Adverse effects on integrity

1.4.6.2 The European Commission's guidance on managing Natura 2000 sites (EC, 2018) states that the purpose of the Appropriate Assessment is to assess the implications of the plan or project in regards to the conservation objectives of the European site or

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Ramsar, this may be from the plan/project alone or in-combination with other plans or projects. The conclusions should enable the relevant competent authority to conclude whether the plan or project will adversely affect the integrity of the site concerned. The focus of the Appropriate Assessment is therefore specifically on the designated features (species and/or the habitats) of the European site.

- 1.4.6.3 The best scientific knowledge should always be used when undertaking an Appropriate Assessment in order to enable the competent authorities to conclude with certainty that there will be no adverse effects on the integrity of the site. The EC (2018) guidance notes that it is at the time of the decision authorising the implementation of the project that there must be no reasonable scientific doubt remaining as to the potential for adverse effects on the integrity of the site being assessed.
- 1.4.6.4 The judgment of the CJEU confirmed in its ruling in Case C-258/11 Sweetman, Ireland, Attorney General, Minister for the Environment, Heritage and Local Government v An Bord Pleanála [2022] IEHC 2 that ‘Article 6(3) of the Habitats Directive must be interpreted as meaning that a plan or project not directly connected with or required for the management of a site will adversely affect the integrity of that site if it is liable to prevent the lasting preservation of the constitutive characteristics of the site that are connected to the presence of a priority natural habitat whose conservation was the objective justifying the designation of the site in the list of SCIs. The precautionary principle should be applied for the purposes of that appraisal’. EC (2018) advises that this interpretation would also be relevant to non-priority habitat types and to habitats of the designated species.
- 1.4.6.5 EC (2018) defines the ‘integrity of the site’ as the coherent sum of the site’s ecological structure, function and ecological processes, across its whole area, which enables it to sustain the habitats, complex of habitats and/or populations of species for which the site is designated. In Sweetman 1 it was determined that the ecological structure and function of a European site would be adversely affected with regards to the site’s overall ecological functions and “*the lasting preservation of the constitutive characteristics of the site.*”
- 1.4.6.6 EC (2018) also states that if the competent authority considers that the relevant mitigation measures are sufficient to avert the adverse effects on site integrity identified in the Appropriate Assessment, they are then required to become an essential element of the of the final plan or project design or may be listed as a condition for project consent.
- 1.4.6.7 EC (2020) states it is the competent authority’s responsibility to approve the plan or project, a decision made on the basis of the information provided by the applicant to inform the Appropriate Assessment. The decision can only be made after the competent authority is satisfied beyond reasonable scientific doubt that the plan or project will not adversely affect the integrity of the site.
- 1.4.6.8 EC (2020) also reaffirms that the authorisation criterion laid down in the second sentence of Article 6(3) of the Habitats Directive integrates the precautionary principle and makes it possible to effectively prevent the protected sites from suffering adverse effects on their integrity as the result of the plans or projects in question. A less stringent authorisation criterion could not as effectively ensure the fulfilment of the objective of site protection intended under that provision. The onus is therefore on demonstrating the absence of adverse effects rather than their presence, reflecting the precautionary principle. The Appropriate Assessment must therefore be adequately detailed and justified to highlight the absence of adverse effects, using the best scientific knowledge available.

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- 1.4.6.9 In accordance with the decision of the CJEU in Case C-127/02 Landelijke Vereniging tot Behoud van de Waddenzee and Nederlandse Vereniging tot Bescherming van Vogels v Staatssecretaris van Landbouw, Natuurbeheer en Visserij, the measure of significance is made against the conservation objectives for which the European sites were designated.

Consideration of *ex situ* effects

- 1.4.6.10 EC (2018) advises that Article 6(3) safeguards be applied to any development pressures, including those which are outside of the boundaries European sites, but which are likely to have significant effects on that European site.
- 1.4.6.11 The CJEU developed this point when it issued a ruling in Case 461/17 Brian Holohan, Richard Guilfoyle, Noric Guilfoyle, Liam Donegan v An Bord Pleanála [2017] IEHC 268 that determined *inter alia* that Article 6(3) of Directive 92/43/EEC must be interpreted as meaning that an Appropriate Assessment must identify all of the habitat types and species for which a site is protected, and, identify and assess both the effects of the proposed plan or project for the species present on that site, and for which that site has not been listed, and the implications for habitat types and species to be found outside the boundaries of that site, provided that the identified effects have the potential to affect the conservation objectives of the site.
- 1.4.6.12 On this basis, consideration has been given in this ISAA to implications for designated habitats and species located both inside and outside of the identified European site boundaries considered in the HRA Stage 1 Screening Report, with reference to those sites' conservation objectives where effects upon those habitats and/or species could potentially undermine the conservation objectives of the sites concerned.

1.5 Consultation

1.5.1 The Evidence Plan process

- 1.5.1.1 The Applicant is facilitating the Evidence Plan process for the Mona Offshore Wind Project. The purpose of the Evidence Plan process is to agree the information the Mona Offshore Wind Project needs to supply to the Secretary of State, as part of the application for consent for the Mona Offshore Wind Project. The Evidence Plan seeks to ensure compliance with the HRA and Environmental Impact Assessment (EIA) and helps ensure Applicants provide sufficient information as part of their DCO application.
- 1.5.1.2 An evidence plan steering group has been established for the Mona Offshore Wind Project and the Morgan Generation Assets. It was determined appropriate to have a joint evidence plan process across the Mona Offshore Wind Project and the Morgan Generation Assets so as to ensure common issues and cumulative/in-combination issues are appropriately addressed. The steering group is comprised of the Applicant, the Planning Inspectorate, NRW, Natural England, the Joint Nature Conservation Committee (JNCC) and the Marine Management Organisation (MMO) as the key regulatory bodies and SNCBs. The steering group has met at key milestones throughout the EIA process.
- 1.5.1.3 In addition, EWGs have been established to discuss topic specific issues with relevant statutory and non-statutory stakeholders. EWG meetings have been held and will continue to be held at key stages in the EIA process or when new information becomes available for each topic, to provide the opportunity for stakeholders to provide feedback and advice at an early stage. EWGs have been established for the following topics:

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- Physical processes, benthic ecology and fish and shellfish ecology
- Marine mammals
- Offshore ornithology
- Onshore ecology and intertidal birds.

1.5.1.4 A summary of the key consultation undertaken to date for each receptor group is included in the HRA Stage 2 ISAA Part 2 – SAC assessments (Document Reference E1.2) and HRA Stage 2 ISAA Part 3 – SPA and Ramsar Sites assessments (Document Reference E1.3). Further information on technical engagement relevant to the Mona Offshore Wind Project is included in the Technical Engagement Plan (Document Reference E4.1).

1.6 References

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