Partners in UK offshore wind

MONA OFFSHORE WIND PROJECT

Mona and Royal Society for the Protection of Birds Cymru SoCG

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Image of an offshore wind farm

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Glossary

Term	Meaning
Applicant	Mona Offshore Wind Limited.
Development Consent Order (DCO)	An order made under the Planning Act 2008 granting development consent for one or more Nationally Significant Infrastructure Project (NSIP).
Marine licence	The Marine and Coastal Access Act 2009 requires a marine licence to be obtained for licensable marine activities. Section 149A of the Planning Act 2008 allows an applicant for a DCO to apply for a 'deemed' marine licence as part of the DCO process. In addition, licensable activities within 12nm of the Welsh coast require a separate marine licence from Natural Resource Wales (NRW).
Mona Offshore Wind Project	The Mona Offshore Wind Project is comprised of both the generation assets, offshore and onshore transmission assets, and associated activities.
The Planning Inspectorate	The agency responsible for operating the planning process for Nationally Significant Infrastructure Projects.

Acronyms

Acronym	Description
AEoI	Adverse effect on integrity
CEA	Cumulative effects assessment
CRM	Collision risk modelling
DAS	Digital aerial surveys
DCO	Development Consent Order
EIA	Environmental Impact Assessment
EWG	Expert working group
HRA	Habitat Regulation Assessment
ISAA	Information to Support Appropriate Assessment
LSE	Likely significant effects
MHWS	Mean High Water Springs
MLWS	Mean Low Water Springs
OSP	Offshore Substation Platform
PEIR	Preliminary environmental information report
PVA	Population viability analysis
RSPB	Royal Society for the Protection of Birds
SoCG	Statement of Common Ground
SPA	Special Protection Area

Units

Unit	Description
kV	Kilovolts

1 Statement of Common Ground between Mona Offshore Wind Project and the Royal Society for the Protection of Birds Cymru

1.1 Introduction

1.1.1 Overview

1.1.1.1 This Statement of Common Ground (SoCG) has been prepared between Mona Offshore Wind Limited (hereafter referred to as 'the Applicant') and the Royal Society for the Protection of Birds Cymru (hereafter referred to as 'RSPB Cymru'), together the parties. The SoCG sets out the areas of agreement and disagreement between the parties in relation to the proposed Development Consent Order (DCO) application for the Mona Offshore Wind Project.

1.1.1.2 The need for a SoCG between the Applicant and RSPB Cymru is set out in section 1 of Appendix F of the Rule 6 letter issued by the Planning Inspectorate on 07 June 2024.

1.1.1.3 This document is intended to provide the Examining Authority with an overview of the level of common ground between the parties.

1.1.1.4 This SoCG covers key concerns raised in RSPB Cymru's relevant representation (RR-071), and as such focusses on offshore ornithology matters only, and in particular, the impacts of the Mona Offshore Wind Project on species such as Manx shearwater and great black-backed gull. A number of key concerns from RSPB Cymru are related to wider industry limitations on baseline survey methods and assessment of impacts on Manx shearwater and are therefore wider than a project specific issue.

1.1.1.5 Matters relating to onshore and intertidal ornithology were not raised in RSPB Cymru's relevant representation (RR-071) and is therefore not considered to be a key area of concern for RSPB Cymru. It was therefore agreed between the parties that onshore and intertidal ornithology would not be covered in this SoCG.

1.1.1.6 This version of the SoCG has been updated at Deadline 7 to reflect the latest status of agreement between the parties and supersedes the previous versions submitted at Deadline 2 (REP2-088) and Deadline 5 (REP5-052).

1.1.2 Overview of Mona Offshore Wind Project

1.1.2.1 Mona Offshore Wind Project is a proposed offshore wind farm located in the east Irish Sea. The Mona Offshore Wind Project will include both offshore and onshore infrastructure and consist of:

- Mona Array Area: This is where the wind turbines, Offshore Substation Platforms (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 Mean High Water Springs (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 Mean Low Water Springs (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, Mona Onshore Cable Corridor, Mona Onshore Substation, mitigation areas, temporary construction facilities (such as access roads and construction compounds), operational access to the Mona Onshore Substation and the connection to National Grid infrastructure will be located
- 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.

1.1.3 Approach to SoCG

1.1.3.1 This SoCG has been developed during the pre-examination and has been progressed during the examination phase of the Mona Offshore Wind Project. In accordance with discussions between the parties, the SoCG is focused on those issues raised by RSPB Cymru within its response to the Scoping Report, Section 42 consultation and as raised through the Evidence Plan Process that has underpinned the pre-application consultation between the parties. This SoCG also includes those issues raised by RSPB Cymru during the post-application phase (i.e. relevant representations and pre-examination meetings).

1.1.3.2 The structure of this SoCG is as follows:

- Section 1.1: Introduction
- Section 1.2: Summary of SoCG
- Section 1.3: Summary of consultation
- Section 1.4: Agreements Log

1.2 Summary of SoCG

1.2.1.1 This SoCG has outlined the consultation that has taken place between the parties during the pre-application and post-application phase of the Mona Offshore Wind Project. The agreement logs present the position reached on 14 January 2025 (Deadline 7).

1.2.2 Summary of Those Matters Agreed, Ongoing Points of Discussion and Not Agreed

1.2.2.1 Table 1.1 provides a summary of those matters agreed, an ongoing point of discussion or not agreed between the parties.

Table 1.1: Summary of areas agreed, ongoing points of discussion and not agreed between the parties.

Topic	Agreed
Offshore ornithology	Some matters agreed, some matters not agreed

1.3 Summary of consultation

1.3.1.1 The Consultation Report (APP-037) and Technical Engagement Plan (APP-041) submitted with the Mona application for consent set out the consultation undertaken by the Applicant with RSPB Cymru, relevant to offshore ornithology and onshore and intertidal ornithology during the pre-application phases of the Mona Offshore Wind Project. Table 1.2 below provides a summary of the consultation undertaken by the Applicant with RSPB Cymru, relevant to offshore ornithology and onshore and intertidal ornithology during the post-application phases of the Mona Offshore Wind Project.

Table 1.2: Summary of post-application consultation with RSPB Cymru.

Date	Form of consultation	Statutory or non-statutory engagement	Summary of consultation
15 May 2024	Meeting	Non-statutory	• Discussed content of the DCO application • Discussed timeframe of the Pre-examination and Examination milestones • Discussed next steps including points of contact during Pre-examination and Examination, Relevant Representations and SoCG
11 July 2024	Meeting	Non-statutory	• Review of the initial statement of common ground
19 August 2024	Meeting	Non-statutory	• Second review of initial statement of common ground prior to submission at Deadline 2
2 December 2024	Meeting	Non-statutory	• Review of the initial statement of common ground prior to submission at Deadline 5
13 January 2025	Meeting	Non-statutory	• Review of the final SoCG

1.4 Agreement log

1.4.1.1 This section of the SoCG sets out the level of agreement between the parties. For each matter the status is identified as being either agreed, not agreed or an ongoing point of discussion, according to the criteria set out in Table 1.3 below.

Table 1.3: Position definitions and colour coding.

Position and colour coding	Definition of position
Agreed	The matter is considered to be agreed between the parties.
Ongoing point of discussion	The matter is neither agreed or not agreed, and is a matter where further discussion is required between the parties. For example, where additional clarification is being sought from either party, or where relevant information is being prepared / reviewed.
Not agreed, but not material	The matter is not considered to be agreed between the parties, but is not deemed material. For example, the matter is not agreed however, the outcome of the approach taken by either party does not result in a material impact on the assessment or assessment conclusions in either EIA or HRA terms.
Not agreed - Material	The matter is not considered to be agreed between the parties. The outcome of the approach taken by either party is considered to result in a materially different outcome to the assessment conclusions.

1.4.1.2 Table 1.4 sets out the level of agreement between the parties for each relevant component of the application (as identified in section 1.1.2) in relation to offshore ornithology (EIA and HRA).

1.4.2 Offshore ornithology (EIA and HRA)

Table 1.4: Agreement Log between the parties on offshore ornithology.

Reference Number	Discussion point	Applicant's Position	RSPB Cymru's Position	Status
EIA				
RPSB.OO.1	Consultation	The Applicant has undertaken adequate consultation with RSPB Cymru on potential impacts on offshore ornithology and note that further consultation with RSPB Cymru throughout the Examination will be through written communication only.	RSPB Cymru note that they are grateful for the constructive pre-application discussions that have taken place with Mona Offshore Wind Farm Limited in respect of this proposal, particularly through the Evidence Plan process. RSPB Cymru will continue, as far as practicable, to seek to engage with the Applicant throughout the Examination period. However due to the number of offshore wind farm project applications coming forward during 2024 RSPB Cymru will face significant demands on our limited capacity. As a consequence, RSPB Cymru will not be able to engage with any hearings associated with this application and will engage through written communications only and limited to when capacity allows.	Agreed
RSPB.OO.2	Consultation	The EIA has had due regard to matters raised by RSPB Cymru through statutory and non-statutory consultation on potential impacts on offshore ornithology. The Applicant has responded to the RSPB Cymru's relevant representation in the Applicant's Response to Relevant Representations (PDA-008) and to the RSPB Cymru's Deadline 3 submission in the Applicant's Response to RSPB Cymru ExQ1 Responses (REP4-083).	RSPB Cymru noted that while methodological concerns remain, progress towards resolving a number of issues was made during pre-application discussions. RSPB Cymru continue to have significant concerns relating to the project's in-combination and cumulative collision risk and displacement impacts including their assessment. RSPB Cymru have reviewed Offshore Ornithology Supporting Information in line with SNCB advice' (REP4-030) submitted at Deadline 4, and an Offshore Ornithology Cumulative Effects Assessment and In-combination Gap-filling Historical Projects Technical Note (REP4-029) at Deadline 4 and welcome the additional analysis undertaken. RSPB Cymru has also reviewed the further assessments submitted for Deadline 5, REP5-075, which includes PVA for the following species, Kittiwake, Guillemot Razorbill, Great Black-backed Gull, and Lesser Black-backed Gull.	Agreed

Reference Number	Discussion point	Applicant's Position	RSPB Cymru's Position	Status
RSPB.OO.31	Consultation	As above but with specific reference to PVAs for gannet and Herring Gull. The Applicant has provided an updated CEA in Volume 2, Chapter 5: Offshore Ornithology (F2.5 F03) at Deadline 7 to incorporate the relevant examination materials. The Applicant has followed statutory advice and maintains that the use of a 1% increase in baseline mortality threshold for undertaking PVA as agreed with NRW (A), the JNCC and Natural England is robust. Further information is provided in the Applicant's Further Context to the RSPB Cymru SoCG (REP6-089) document (section 1.6.2).	RSPB Cymru have reviewed Offshore Ornithology Supporting Information in line with SNCB advice' (REP4-030) submitted at Deadline 4, and an Offshore Ornithology Cumulative Effects Assessment and In-combination Gap-filling Historical Projects Technical Note (REP4-029) at Deadline 4 and welcome the additional analysis undertaken. RSPB Cymru has also reviewed the further assessments submitted for Deadline 5, REP5-075. The Applicant has not presented PVA for Herring Gull and gannet because of the 1% increase in baseline mortality threshold used to take forward to further assessment that RSPB Cymru does not support. RSPB Cymru acknowledges that NRW (A) and the JNCC support the use of the 1% threshold for the Mona Offshore project, but RSPB Cymru supports the NatureScot guidance, which advises a lower threshold, 0.02% mortality, for PVAs to be undertaken.	Not agreed - material
RSPB.OO.3	Surveys	The broad approach to site specific digital aerial surveys (DAS) is appropriate.	RSPB Cymru requested more detail than was presented in EWG meeting 1 to be able to provide agreement on the DAS approach. RSPB Cymru could not agree the survey methodology without further detail. It was agreed that they would review further detail provided at the scoping stage (EWG 18-02-2022 in D.9 of APP-042). RSPB Cymru have reviewed the detail in D.9 of APP-042. We note that this included requests for further detail to be provided from both RSPB Cymru and JNCC. The latter asked for justification for the 396m flight altitude of the survey plane and RSPB Cymru asked for more general details. We are not aware that these details have been provided in full. RSPB Cymru's concerns are industry wide concerns and follow the review of DAS methodologies carried out by a subgroup of NatureScot's Scientific Advisory Committee and subsequent recommendations (NatureScot, 2023[1]). We ask that reporting of the surveys follows these recommendations.	Not agreed- not material

[1] NatureScot, 2023, Offshore Wind Ornithological Impact Assessment - Review of Digital Aerial Survey Methods. Availiable Offshore Wind Ornithological Impact Assessment - Review of Digital Aerial Survey Methods | NatureScot

Reference Number	Discussion point	Applicant's Position	RSPB Cymru's Position	Status
RSPB.OO.4	Surveys	The broad approach to site specific digital aerial surveys (DAS) for Manx Shearwater is appropriate. The Applicant has responded to the RSPB Cymru's relevant representation in the Applicant's Response to Relevant Representations (PDA-008) and to the RSPB Cymru's Deadline 3 submission in the Applicant's Response to RSPB Cymru ExQ1 Responses (REP4-083). During the site-specific DAS survey, 2,544 individual Manx shearwater were detected in 11 out of the 24 months of surveying (Volume 6, Annex 5.1: Offshore Ornithology Baseline Characterisation Technical Report (APP-091). This species was, therefore, detected regularly during the surveys during the months in which the species is known to be present in the area. Best practice survey techniques were employed but cannot be undertaken at night, which is an inherent limitation of the survey methodology. Further information is provided in the Applicant's Further Context to the RSPB Cymru SoCG (REP6-089) document (section 1.6.1).	In their Relevant Representation (RR-017), RSPB Cymru expressed outstanding concerns that the Manx shearwater baseline characterisation using digital aerial surveys (DAS) does not adequately capture the activity of the species. Their position was that the diel variation in Manx shearwater activity means that the somewhat limited amount of time DAS were carried out is unlikely to properly characterise the activity of Manx shearwater at the Application site. RSPB Cymru also expressed concerns regarding whether the size and flight characteristics of the species make them harder to detect in the surveys. As a result, RSPB Cymru do not have confidence in the baseline densities of Manx Shearwater presented in the assessment. RSPB Cymru have reviewed the Applicant's response to their relevant representation on this matter (PDA-008, paragraph RR-071.7). We welcome the Applicant's review of available tracking data and agree that it provides important contextual evidence. However, tracking data is carried out on a relatively small number of individuals and may not be reflective of wider population usage of a site. The Applicant has provided further details of these tracking studies in REP6-089 and RSPB Cymru have reviewed. As such, while RSPB does still have remaining concerns with the use of DAS to survey Manx Shearwaters.in general, these concerns are unlikely to be of material significance in the context of the Application.	Not agreed – not material

Reference Number	Discussion point	Applicant's Position	RSPB Cymru's Position	Status
RSPB.OO.5	Scoping	The assessment has identified and assessed all likely significant affects relevant to ornithology as identified within the Scoping Report and Scoping Opinion. Potential impacts to offshore ornithology at the ecosystem level are assessed in the inter-related effects assessment (Paragraphs 11.6.3.10 to 12 and Table 11.10 of Volume 2, Chapter 11: Inter-related effects (offshore) (APP-063)). The Applicant has responded to the Examining Authority's question (Q1.17.15) regarding the assessment of ecosystems level effects relevant to offshore ornithology (REP3-062). The Applicant has responded to RSPB Cymru's Deadline 3 submission in the Applicant's Response to RSPB Cymru ExQ1 Responses (REP4-083). Further information is provided in the Applicant's Further Context to the RSPB Cymru SoCG (REP6-089) document (section 1.5.1).	RSPB Cymru consider that the Assessment has not fully considered indirect ecosystem impacts (e.g. displacement from foraging areas, additional energy expenditure, potential impacts on forage fish and wider ecosystem impacts such as changes in stratification). RSPB Cymru would welcome consideration of the potential wider ecosystem impacts. The following is taken from RSPB's ExQ1 response (having reviewed APP-063) The Applicant approach as detailed in APP-063 is that for offshore ornithology, the following potential impacts were considered within the inter-related assessment: • Disturbance and displacement from airborne noise, underwater sound, and presence of vessels and infrastructure. • Indirect impacts from underwater sound affecting prey species. • Temporary habitat loss/disturbance and increased Suspended Sediment Concentrations. • Collision risk. • Barrier effects. While these assessments are welcome, this does not include those listed in the question, in particular species energy expenditure and ocean stratification. There is potential for seabirds to have greater energy expenditure as a result of, for example, loss of foraging opportunities, greater commuting flight times, and increased metabolic costs of flight in areas with turbulence flumes. While these to a limited extent are considered with the analysis of displacement and barrier effects under mortality rate, they are not explicitly considered in the assessment. Changes in ocean stratification have also not been explicitly considered. Such changes in hydrodynamic regimes can have subsequent effects on the stability and strength of oceanographic features such as tidal mixing fronts[2]. These fronts are important drivers of the spatio-temporal availability of prey species for seabirds[3] and so modification to these through the presence of turbines can have profound effects on the distribution and fitness of these species. RSPB Cymru is concerned that these consequences of modifications to oceanographic dynamic have not been properly addressed.	Not agreed- not material

Reference Number	Discussion point	Applicant's Position	RSPB Cymru's Position	Status
RSPB.OO.6	Baseline environment	The baseline characterisation for offshore ornithology in respect of Manx Shearwater is appropriate.	RSPB Cymru's concerns with the baseline characterisation for Manx Shearwater are set out under RSPB.OO.4 above. RSPB Cymru have reviewed JNCC's response to Q1.17.13 in REP3-084 and the Applicant's further details of available tracking studies in REP6-089 (see also RSPB.OO.4 above). As such, while RSPB does still have remaining concerns with the use of DAS to survey Manx Shearwaters.in general, these concerns are unlikely to be of material significance in the context of the Application. However, we remain of the view that the uncertainty inherent in this aspect of the assessment must also feed into the degree of precaution used in any conclusions as to the significance of impacts.	Not Agreed – not material
RSPB.OO.29	Baseline environment	The baseline characterisation for offshore ornithology (with the exception of Manx Shearwater) is appropriate.	RSPB Cymru agree with the baseline characterisation of offshore ornithology receptors (with the exception of Manx Shearwater).	Agreed
RSPB.OO.7	Study area	The EIA study area is appropriate for the receptors and impacts assessed.	RSPB Cymru is in agreement that the EIA study area is appropriate.	Agreed
RSPB.OO.8	Project design envelope	The EIA chapter has identified, described and assessed the maximum design scenario for the EIA.	RSPB Cymru is in agreement that the maximum design scenario has been adequately identified and described.	Agreed

[2] Isaksson, N., Scott, B.E., Hunt, G.L., Benninghaus, E., Declerck, M., Gormley, K., Harris, C., Sjöstrand, S., Trifonova, N.I., Waggitt, J.J. and Wihsgott, J.U., 2023. A paradigm for understanding whole ecosystem effects of offshore wind farms in shelf seas. *ICES Journal of Marine Science*, p.fsad194.

[3] Cleasby, I.R., Owen, E., Miller, P.I., Jones, R.J., Wilson, L.J. and Bolton, M., 2024. Functional responses of a medium-ranging marine predator highlight the importance of frontal zones as foraging locations. *Marine Ecology Progress Series*, *740*, pp.175-191.

Reference Number	Discussion point	Applicant's Position	RSPB Cymru's Position	Status
RSPB.OO.9	Assessment methodology	The sensitivity of offshore ornithology receptors has been correctly identified and sufficiently described within the EIA. The Applicant has responded to the RSPB Cymru's relevant representation in the Applicant's Response to Relevant Representations (PDA-008) and to the RSPB Cymru's Deadline 3 submission in the Applicants Response to RSPB Cymru ExQ1 Responses (REP4-083). Further information is provided in the Applicant's Further Context to the RSPB Cymru SoCG (REP6-089) document (section 1.4.1).	RSPB Cymru has expressed concern regarding the potentially severe population scale impacts on seabird populations from the outbreak of the H5N1 strain of Highly Pathogenic Avian Influenza (HPAI). This scale of the impact of HPAI means that seabird populations will be much less robust to additional mortality arising from offshore wind farm developments. It also means that there may need to be a reassessment of whether SPA populations are in Favourable Conservation Status. RSPB Cymru noted that they do not agree with Natural England's guidance on HPAI in relation to baseline characterisation of offshore renewable projects (Natural England, 2022). RSPB Cymru have reviewed the Applicant's response to their relevant representation on this matter (PDA-008, paragraph RR-071.12). RSPB Cymru does not agree that the implications on assessment of the outbreak have been adequately assessed for the following reasons. The impacts of HPAI and thus reductions in colony sizes may be manifested through the direct effects of mortality or the indirect effects arising through physiological constraints due to infection. These could arise for example, through impaired foraging ability or lower productivity. The severity and rate of recovery from these effects will determine the utilisation of space by seabird populations and consequently their interactions with wind farms. As well as changes to population numbers, HPAI infection is likely to cause variation in space use over time between individual birds and colonies, in part due to a likely decrease in competition, but also potentially related to physiological changes, such as in vision and fitness. This change in space use will be reflected in changes in the extent of interactions with wind farms, and in the lethal and sub-lethal consequences of those interactions. Recent research into the impact of the 2022 HPAI outbreak on gannet movements and space use has revealed that surviving gannets instigated unprecedented long-distance exploratory movements during the outbreak, likely as a short-term response to HPAI-related disturbance (Jeglinski et al. 2023[4]). Breeding gannets tracked several months following the outbreak showed a high degree of breeding colony fidelity and foraging time budgets that are characteristic for the species, but birds showed reduced foraging effort, that is foraging trips were shorter in duration, and in maximal and total distance travelled, compared to data from previous years, likely because of reduced competition (Gremillet et al. 2023[5]). RSPB Cymru is concerned that the implications arising from the HPAI outbreak have not been fully considered in the assessment. RSPB Cymru do not agree with Natural England's guidance on HPAI in relation to baseline characterisation of offshore renewable projects (Natural England, 2022).	Not agreed-material

Reference Number	Discussion point	Applicant's Position	RSPB Cymru's Position	Status
RSPB.OO.10	Assessment methodology	The approach to displacement assessment methodology is appropriate.	RSPB Cymru agree that the displacement assessment methodology is appropriate.	Agreed
RSPB.OO.30	Assessment methodology	The approach to collision risk assessment methodology (for all species except Manx Shearwater) is appropriate.	RSPB Cymru agree with the approach to collision risk assessment methodology (for all species except Manx Shearwater).	Agreed
RSPB.OO.11	Assessment methodology	The approach to collision risk assessment methodology for Manx Shearwater is appropriate. The Applicant has responded to the RSPB Cymru's relevant representation in the Applicant's Response to Relevant Representations (PDA-008) and to the RSPB Cymru's Deadline 3 submission in the Applicant's Response to RSPB Cymru ExQ1 Responses (REP4-083). Further information is provided in the Applicant's Further Context to the RSPB Cymru SoCG (REP6-089) document (section 1.4.2).	RSPB Cymru stated that the collision risk methodology for Manx shearwater does not adequately consider behaviour change because of illuminations, and therefore disagree with Applicant's conclusion that there would be no adverse impact to Manx Shearwater. RSPB Cymru acknowledges that there is no guidance regarding the assessment of behavioural change due to wind turbine illuminations, and this concern needs to be addressed by the wider industry and other stakeholders. RSPB Cymru has reviewed, as far as is possible, the information submitted by the Applicant into the examination. This information has not resolved RSPB Cymru's concerns as it has not provided an update on how collision modelling should consider the attraction and disorientation arising through turbine illuminations.	Not agreed - Material

[4] Jeglinski, J.W., Lane, J.V., Votier, S.C., Furness, R.W., Hamer, K.C., McCafferty, D.J., Nager, R.G., Sheddan, M., Wanless, S. and Matthiopoulos, J., 2024. HPAIV outbreak triggers short-term colony connectivity in a seabird metapopulation. Scientific Reports, 14(1), p.3126

[5] Grémillet, D., Ponchon, A., Provost, P., Gamble, A., Abed-Zahar, M., Bernard, A., Courbin, N., Delavaud, G., Deniau, A., Fort, J. and Hamer, K.C., 2023. Strong breeding colony fidelity in northern gannets following high pathogenicity avian influenza virus (HPAIV) outbreak. Biological Conservation, 286, p.110269.

Reference Number	Discussion point	Applicant's Position	RSPB Cymru's Position	Status
RSPB.OO.17	Assessment of the effects from the project cumulatively with other projects	There will be no significant effects on ornithology receptors in EIA terms for the project cumulatively with other plans and projects. The Applicant has provided an updated CEA in Volume 2, Chapter 5: Offshore Ornithology (F2.5 F03) at Deadline 7 to incorporate the relevant examination materials. This has not altered the conclusions drawn. The Applicant has followed statutory advice and maintains that the use of a 1% increase in baseline mortality threshold for undertaking PVA as agreed with NRW (A), the JNCC and Natural England is robust. The Applicant has presented in Table 1-26 of REP5-075, the median Counterfactual Population Size (CPS) which represents the ratio of the impacted to unimpacted (baseline) scenarios with a ratio of 0.694 presented in Table 1-26 of REP5-075). The narrative describing the outputs of the PVA in paragraph 1.6.4.4 of REP5-075 has focussed on the Counterfactual Growth Rate (CGR) in line with guidance (Parker et al., 2022) and the presentation of PVAs outputs has been agreed with NRW (A) and the JNCC.	RSPB Cymru expressed significant concerns relating to the project's in-combination and cumulative collision risk and displacement impacts including their assessment. RSPB Cymru welcomes the Applicant's engagement with the SNCBs on this matter. RSPB Cymru have reviewed the Offshore Ornithology Supporting Information in line with SNCB advice' (REP4-030) submitted at Deadline 4, and an Offshore Ornithology Cumulative Effects Assessment and In-combination Gap-filling Historical Projects Technical Note (REP4-029) at Deadline 4 and welcome the additional analysis undertaken. These analyses resolve the methodological concerns raised by the SNCBs and RSPB Cymru. RSPB Cymru has also reviewed the further assessments submitted for Deadline 5, REP5-075, which includes PVA for the following species, Kittiwake, Guillemot Razorbill, Great Black-backed Gull, and Lesser Black-backed. The Applicant has not presented PVA for Herring Gull because of the 1% increase in baseline mortality threshold used to take forward to further assessment that RSPB Cymru does not support. RSPB Cymru acknowledges that NRW (A) and the JNCC support the use of the 1% threshold for the Mona Offshore project, but RSPB Cymru supports the NatureScot guidance, which advises a lower threshold, 0.02% mortality, for PVAs to be undertaken. Having reviewed these outputs, RSPB Cymru does not agree with the Applicants conclusion of no significant impact for Great Black-backed Gull in EIA terms. The Applicant's model predicts that the impacts arising from collision and associated with the development cumulatively with other wind farms are predicted to result in the annual regional population growth rate of Great Black-backed Gull declining with a ratio of impacted to unimpacted population growth rate of between 0.990. This means that after the 35-year lifetime of the Development, the regional population size is expected to be **69.4%** of what it would have been in the absence of the development. RSPB Cymru consider this to be significant in EIA terms.	Not Agreed - Material

Reference Number	Discussion point	Applicant's Position	RSPB Cymru's Position	Status
RSPB.OO.18	Quantification of the impacts from historical offshore wind projects for which quantitative analyses were not available	The Applicant has provided appropriate indicative estimates for 'unknown' displacement and collision impacts from historical offshore wind projects for inclusion in the CEAs and in-combination assessments for the Mona Offshore Wind Project The Applicant submitted an Offshore Ornithology Cumulative Effects Assessment and In-combination Gap-filling Historical Projects Technical Note (REP4-029) at Deadline 4, following the SNCB methodology for quantifying impacts from historical projects. These gap-filled numbers are presented within the CEA as part of Volume 2, Chapter 5: Offshore Ornithology (F2.5 F03) submitted at Deadline 7.	With regards to the methodology for assessment of cumulative/in-combination impacts, RSPB Cymru recognise the difficulties with carrying out a full in combination assessment for a number of species SPA combinations because of the difficulties in obtaining historical data and the limitations in how it was collected and analyses. They highlighted that Natural England have produced what they consider to be a practical and pragmatic solution. RSPB Cymru stated that while it is acceptable for the Applicant to present alternative methodologies, it would be preferable for the outputs to be presented alongside those obtained following the recommendations of the Statutory Agencies. RSPB Cymru have reviewed Offshore Ornithology Supporting Information in line with SNCB advice' (REP4-030) submitted at Deadline 4, and an Offshore Ornithology Cumulative Effects Assessment and In-combination Gap-filling Historical Projects Technical Note (REP4-029) at Deadline 4 and welcome the additional analysis undertaken.	Agreed
RSPB.OO.24	Screening	The approach to HRA Stage 1 Screening using outputs for CRM, displacement assessment and associated apportioning is appropriate.	RSPB Cymru have significant concerns regarding the findings of the impact assessment in relation to Manx Shearwater as a result of the methodological concerns (see RSPB.OO.11 above).	Not agreed - Material

Reference Number	Discussion point	Applicant's Position	RSPB Cymru's Position	Status
RSPB.OO.25	Outcomes of the Information to Support Appropriate Assessment (ISAA)	There will be no AEoI for SPAs designated for offshore ornithology features for any impacts for the project alone and in-combination with other projects and plans.	See RSPB.OO.24 above. RSPB Cymru's position is that Adverse Effects on Integrity (AEoI) cannot be ruled out beyond reasonable scientific doubt for collision impacts and distributional change arising through the project alone and in combination with other projects for Manx shearwater at the following Special Protection Areas: • Copeland Islands SPA • Irish Sea Front SPA • Rum SPA • St Kilda SPA • Glannau Aberdaron ac Ynys Enlli/Aberdaron Coast and Bardsey Island SPA • Skomer, Skokholm and the Seas off Pembrokeshire/Sgomer, Sgogwm a Moroedd Penfro SPA.	Not agreed-Material

RSPB.OO.26	Outcomes of the ISAA	There will be no AEoI for SPAs designated for offshore ornithology features for any impacts for the project in-combination with other projects and plans. To consolidate various examination materials, the Applicant has provided an updated in-combination assessment in HRA Stage 2 ISAA Part Three (E1.3 F03) which uses the Applicant's approach and in HRA Stage 2 ISAA Part Three Annex 1.3.1 (E1.3.1) which assesses impacts using the range-based approach as advised by the SNCBs (NRW (A) and the JNCC). The Applicant has undertaken an assessment of the full range of impacts and has concluded no adverse effect on site integrity for all sites and species considered. The assessments presented follow the process and outcomes agreed with the SNCBs pre-application and during the course of Examination.	See RSPB.OO.24 and RSPB.OO.18 above. RSPB Cymru also expressed significant concerns relating to the project's in-combination and cumulative collision risk and displacement impacts including their assessment. With regards to the methodology for assessment of cumulative/in-combination impacts, RSPB Cymru recognise the difficulties with carrying out a full in combination assessment for a number of species SPA combinations because of the difficulties in obtaining historical data and the limitations in how it was collected and analyses. They highlighted that Natural England have produced what they consider to be a practical and pragmatic solution. RPSB Cymru stated that while it is acceptable for the Applicant to present alternative methodologies, it would be preferable for the outputs to be presented alongside those obtained following the recommendations of the Statutory Agencies. RSPB Cymru have reviewed Offshore Ornithology Supporting Information in line with SNCB advice' (REP4-030) submitted at Deadline 4, and an Offshore Ornithology Cumulative Effects Assessment and In-combination Gap-filling Historical Projects Technical Note (REP4-029) at Deadline 4 and welcome the additional analysis undertaken. While these analyses resolve the methodological concerns raised by the SNCBs and RSPB Cymru, we would prefer a full analysis, including PVA, to be carried out for the following species, Razorbill, Kittiwake, Great Black-backed Gull, Herring Gull, Lesser Black-backed Gull and Gannet. The Applicant has not presented PVA for these species because of the 1% increase in baseline mortality threshold used to take forward to further assessment that RSPB Cymru does not support. RSPB Cymru acknowledges that NRW (A) and the JNCC support the use of the 1% threshold for Mona Offshore Wind Project but RSPB Cymru support the NatureScot guidance which advises a lower threshold for PVAs to be undertaken. RSPB Cymru have reviewed the Deadline 5 submission, REP5-074, which includes PVA for the following species and SPAs: • Black-legged kittiwake from: – Skomer, Skokholm and the Seas off Pembrokeshire/Sgomer, Sgogwm a Moroedd Penfro SPA • Common guillemot from: – Skomer, Skokholm and the Seas off Pembrokeshire/Sgomer, Sgogwm a Moroedd Penfro SPA	Not Agreed - Material

			• Northern gannet from: – Grassholm SPA • Manx shearwater from: – Aberdaron Coast and Bardsey Island SPA /Glannau Aberdaron ac Ynys Enlli/ – Skomer, Skokholm and the Seas off Pembrokeshire/Sgomer, Sgogwm a Moroedd Penfro SPA • Razorbill from: – Skomer, Skokholm and the Seas off Pembrokeshire/Sgomer, Sgogwm a Moroedd Penfro SPA RSPB Cymru welcome these additional analyses but would prefer that all species and SPA combinations that exceed the NatureScot preferred threshold of 0.02% baseline mortality in order to have a proportionate degree of precaution in relation to the high level of uncertainty inherent in the assessment. Following this review RSPB do not agree with the conclusion of no potential for AEoI for the kittiwake as part of the assemblage of the Skomer, Skokholm and the Seas off Pembrokeshire/Sgomer, Sgogwm a Moroedd Penfro SPA. The impacts arising from collision and distributional change associated with the development in combination with other wind farms are predicted to result in the annual population growth rate of Kittiwake at the Skomer, Skokholm and the Seas off Pembrokeshire/Sgomer, Sgogwm a Moroedd Penfro SPA declining with a ratio of impacted to unimpacted population growth rate of between 0.993 and 0.996. This means that after the 35-year lifetime of the development, the population size of the SPA is expected to be between **77.1 and 85.4%** of what it would have been in the absence of the development. RSPB Cymru are also concerned with how PVAs have been populated with predicted mortality figures, in particular in regard to distributional change. There is consensus amongst the SNCBs and with RSPB that the most suitable way to present these figures is as a range of values, in order to reflect on the inherent uncertainty and variability in these estimates. However the Applicant has only presented the upper ranges in some instances, and while these figures are within a *possible* range of values, they exclude much of the *probable* range. So while these additional analyses are welcome, we do not believe that they present a clear assessment of the full range of potential impacts and so we are unable to reach conclusions as to the significance of impacts for a number of species and SPAs, in particular, the Guillemot and Razorbill populations of the Skomer, Skokholm and the Seas off Pembrokeshire/Sgomer, Sgogwm a Moroedd Penfro SPA.	