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Dyddiad/Date: 12/03/2025

Er sylw / For the attention of: Robert Jackson

Annwyl / Dear Robert,

PROPOSED MORECAMBE OFFSHORE WINDFARM GENERATION

**ASSETSCYFEIRNOD YR AROLYGIAETH GYNLLUNIO / PLANNING INSPECTORATE
REFERECE: EN01012**

EIN CYFEIRNOD / OUR REFERENCE: 20049491

RE: NATURAL RESOURCES WALES' DEADLINE 5 SUBMISSIONS

Thank you for your Rule 8 letter, dated 30th October 2024, requesting Cyfoeth Naturiol Cymru / Natural Resources Wales' (NRW) comments regarding the above.

Please find below NRW's Deadline 5 submissions which comprises advice on the submissions produced by the Applicant submitted at Deadline 4 on 18th February 2025.

The documents that we have reviewed for Deadline 5 include:

- [REP4-009] 4.9 Report to Inform Appropriate Assessment (Clean) - Revision 03 (Volume 4)
- [REP4-011] 5.1.11 Environmental Statement Chapter 11: Marine Mammals (Clean) - Revision 03 (Volume 5)

- [REP4-013] 5.2.11.1 Environmental Statement Appendix 11.1: Underwater Noise Assessment (Clean) - Revision 02 (Volume 5)
- [REP4-015] 5.2.11.2 Environmental Statement Appendix 11.2: Marine Mammal Information and Survey Data (Clean) - Revision 04 (Volume 5)
- [REP4-017] 5.2.11.3 Environmental Statement Appendix 11.3: Marine Mammal Unexploded Ordnance Assessment (Clean) - Revision 03 (Volume 5)
- [REP4-019] 5.2.11.4 Environmental Statement Appendix 11.4 Marine Mammal CEA Project Screening (Clean) - Revision 03 (Volume 5)
- [REP4-021] 5.5 Schedule of Mitigation (Clean) - Revision 04 (Volume 5)
- [REP4-025] 6.4 In Principle Monitoring Plan (Clean) - Revision 03 (Volume 6)
- [REP4-027] 6.5 Draft Marine Mammal Mitigation Protocol (Clean) - Revision 03 (Volume 6)
- [REP4-029] 8.5 Combined Examination Progress Tracker and Statement of Commonality (Clean) - Revision 05 (Volume 8)
- [REP4-045] 9.20 Report on Interrelationships with Other Infrastructure Projects (Clean) - Revision 02 (Volume 9)
- [REP4-047] 9.31 Commitments Register (Clean) - Revision 02
- [REP4-049] 9.32 Outline Underwater Sound Management Strategy (Clean) - Revision 02 (Volume 9)
- [REP4-058] 9.51 The Applicant's Comments on Deadline 3 Submissions by Interested Parties - Revision 01 (Volume 9)

This response only provides advice and comments from NRW's Advisory (NRW (A)) function. We have provided advice specifically on marine ornithology and marine mammals regarding in-combination and cumulative effects considering the Applicant's Deadline 4 submissions. Where we have not provided explicit advice, it can be taken that we have no further comments to make at this stage and that the ExA should refer to our previous submissions on those matters.

These representations and attachments should be read in conjunction with advice previously provided into the examination.

NRW continues to engage with the Applicant throughout the examination to resolve outstanding matters.

The comments provided in this submission, comprise NRW's response as a Statutory Party under the Planning Act 2008 and Infrastructure Planning (Interested Parties) Regulations 2015 and as an 'Interested Party' under s102(1) of the Planning Act 2008.

Our comments are made without prejudice to any further comments we may wish to make in relation to this application and examination whether in relation to the Environmental Statement (ES) and associated documents, provisions of the draft Development Consent Order ('DCO') and its Requirements, or other evidence and documents provided by Flotation Energy ('the Applicant'), the Examining Authority or other Interested Parties.

Should further clarity be required, we will be pleased to answer these further through the Examining Authority questions and / or a Rule 17 request(s).

Please do not hesitate to contact Rebekah Newstead
[REDACTED] [\[REDACTED\]@cyfoethnaturiolcymru.gov.uk](mailto:[REDACTED]@cyfoethnaturiolcymru.gov.uk) and Bridget Randall-Smith
[REDACTED] [\[REDACTED\]@cyfoethnaturiolcymru.gov.uk](mailto:[REDACTED]@cyfoethnaturiolcymru.gov.uk) should you require further advice or information regarding these representations.

Yn gywir / Yours sincerely,

[REDACTED]
Andrea Winterton

**Marine Services Manager
Natural Resources Wales**

[CONTINUED]

Contents

Marine Ornithology	5
1. Offshore Ornithology Comments on Morecambe Applicant Deadline 4 Submissions 5	
1.1 Report to Inform Appropriate Assessment - Revision 03 (Volume 4) [REP4-009/010].....	5
1.2 The Applicant's Comments on Deadline 3 Submissions by Interested Parties - Revision 01 (Volume 9) [REP4-058]	7
Marine Mammals	8
2. Marine Mammal Comments on Morecambe Applicant Deadline 4 Submissions	8
2.1 Issues that NRW (A) considers require resolution before agreeing to overall conclusions.....	8
2.2 All issues relating to the cumulative and in-combination assessment.....	8
2.3 All issues relating to the draft Marine Mammal Mitigation Protocol (MMMP) - Revision 03 (Volume 6) [REP4-027/028] and Outline Underwater Sound Management Strategy - Revision 02 (Volume 9) [REP4-049/050].....	9
2.4 NRW's Response to Applicant's Comments on Deadline 3 Submissions by Interested Parties [REP4-058]	11
2.5 Updates to NRW's Deadline 4 Submission [REP4-074]:	14
3. References.....	16
4. Appendix 1: Report to Inform Appropriate Assessment - Revision 03 (Volume 4) [REP4-009/010]: NRW (A) detailed comments on HRA scale alone and in-combination impacts for relevant Welsh sites.....	17

Marine Ornithology

1. Offshore Ornithology Comments on Morecambe Applicant Deadline 4 Submissions

1.1 Report to Inform Appropriate Assessment - Revision 03 (Volume 4) [REP4-009/010]

Overall comments

1.1.1 Project Alone

1. NRW (A) welcome the Applicant's updates to the apportioned project alone impacts and assessment of displacement for the Manx shearwater features of the Aberdaron Coast and Bardsey Island (AC & BI) SPA and Skomer, Skokholm and seas off Pembrokeshire (SSSP) SPA in Sections 8.21.3.1 and 8.32.3.1 of the updated RIAA [REP4-009]. We do note that there is an error in paragraphs 1010 and 1395 of REP4-009, as the Applicant has amended the Manx shearwater return/spring migration definition from March-May to just May. However, we note that the NRW (A) advice was for this to be defined as March (Section 3.1 [REP1-099]). Despite this, the apportioned seasonal Manx shearwater abundance figures for the relevant Welsh SPAs (AC & BI and SSSP) appear to have used the correct advised seasonal definitions, suggesting this is a typographical error.
2. We also welcome that the Applicant has updated the Grassholm SPA gannet assessment in Section 8.33.3.1 of REP4-009 to account for the updated EIA mean peak abundances corrected in PD1-010 and the subsequent updated SPA apportioned abundances and displacement assessment in presented in REP3-058. The updated RIAA assessment for the project alone is consistent with REP3-058 and our advice regarding Grassholm SPA gannet predicted impacts from both the project alone remains as set out in our Deadline 4 response (see Section 1.4.2.3 [REP4-074]).
3. Following these updates to the RIAA for the relevant Welsh SPAs, we can agree that an adverse effect on site integrity (AEoSI) can be ruled out from the project alone for all relevant marine ornithology features of all the Welsh SPAs screened into the RIAA. Further detail on the specific Welsh sites where updates have been made to the RIAA [REP4-009] can be found in *Appendix 1*. Please note this does not include advice on Liverpool Bay SPA, as we defer advice on the features of this site to Natural England.

1.1.2 In-Combination

4. NRW (A) welcome updates in the RIAA [REP4-009] to the in-combination annual apportioned abundances for Manx shearwater at the AC & BI SPA and for Manx shearwater, guillemot and razorbill at the SSSP SPA for each offshore wind farm (OWF)

project included in the in-combination assessments to those included in the Morgan Generation Assets project's in-combination assessments. This predominantly addresses our previous concerns regarding the Morecambe Applicant's use of an annual weighted mean apportionment approach (see Sections 1.4.1.2, 1.4.2.1.2 and 1.4.2.2.2 of our Deadline 4 response [REP4-074]). However, we note the following issues with the Applicant's approach:

- In the in-combination assessments, the Applicant appears to have used the Manx shearwater abundance figures for the Morecambe Generation Assets project as included in the Morgan Generation Assets project's in-combination assessment, rather than the updated apportioned impacts for the Morecambe Generation Assets project alone included in the updated project RIAA (numbers presented in Tables 8-47 and 8-83 of [REP4-009]). The figures included by the Morgan project were based on the Morecambe submission documents, which contained errors in the EIA mean peak seasonal abundances of Manx shearwaters, which had been taken through to the original RIAA at submission [APP-027]. Whilst these were the best available numbers for the Morecambe project at the time of the Morgan in-combination being completed, the apportioned abundances for the Morecambe project alone for Manx shearwaters at both of these Welsh SPAs were higher than revised figures in the updated RIAA [REP4-009]. As a result the in-combination apportioned total abundances to both SPAs can be considered to be potential over estimates, but this does not materially alter the conclusions in this case.
- The Morgan Generation Assets project included impacts for the Barrow, North Hoyle and Rhyl Flats OWF projects in their in-combination assessments. NRW (A) recommend including these projects in the in-combination assessments for completeness. However, we note that based on the Morgan assessment, the inclusion of these three projects added totals (below) should not impact the conclusions in this case:
 - approximately 1 and 2 adult Manx shearwaters from the AC & BI SPA and SSSP SPA respectively;
 - approximately 5 adult guillemots from the SSSP SPA;
 - approximately 1 adult razorbill from the SSSP SPA.
- The Applicant has used project abundance data from *Morgan Generation Assets (2025) Annex 16.2 to Ornithological assessment clarification data Welsh site [REP5-033]*, submitted during the projects examination at Deadline 5. Errors were found in the Morgan Applicant's Deadline 5 submission, which were subsequently corrected, along with inclusion of additional information, in an additional submission ((Morgan Offshore Wind Limited (2025) *Updated ornithological clarification data in relation to Natural Resources Wales submissions from the Applicant received on 31 January 2025* [AS-013]). However, the errors and additional information related to Grassholm SPA gannets and do not affect the updated in-combination assessments of relevance for the Morecambe updates to sites within NRW's remit, which relate to Manx shearwater, guillemot and razorbill Welsh SPAs.

5. Following these updates to the RIAA for the relevant Welsh SPAs, NRW (A) can agree that an adverse effect on site integrity (AEoSI) can be ruled out from the project in-combination for all relevant marine ornithology features of all the Welsh SPAs screened into the RIAA. Further detail on the specific Welsh sites where updates have been made to the RIAA [REP4-009] can be found in *Appendix 1*. Please note this does not include advice on Liverpool Bay SPA, as we defer advice on the features of this site to Natural England.

1.2 The Applicant's Comments on Deadline 3 Submissions by Interested Parties - Revision 01 (Volume 9) [REP4-058]

6. NRW (A) have not provided individual responses to each marine ornithology-related issue, as many would be quite repetitive and relate to a small number of issues/updated documents that the Applicant has submitted into the examination or intends to submit at Deadline 5.
7. Regarding the EIA scale project alone abundances of gannet and Manx shearwater, as well as the apportioned impacts for these species to Welsh SPAs for HRA, please see our Deadline 4 response [REP4-074]. NRW (A) welcome the Applicant's updates to the RIAA in their Deadline 4 submissions [REP4-009], which incorporates revisions made during the examination. These include updated project alone assessments for Welsh SPAs with gannet and Manx shearwater features to account for the updated abundance figures, and to include the historical projects in the in-combination assessments for relevant Welsh SPAs. Please see our detailed response/comments to the updated assessments presented in REP4-009 submitted at Deadline 5.
8. NRW (A) welcome the Applicant intention to submit an updated ES 'Chapter 12 Offshore Ornithology' at Deadline 5 that will include the EIA updates made during the examination so far. These should include the updates to the Manx Shearwater and gannet mean peak abundances, a review of the gap filled project numbers following the Mona project updates, and inclusion of the gap filled projects in the CEA. NRW (A) will provide comments where relevant following detailed review of the Applicant's Deadline 5 submissions.
9. Regarding the Applicant's assessment for the Great Orme's Head Site of Special Scientific Interest (SSSI) [REP3-056], please see our detailed comments in Section 1.3.2 of our Deadline 4 response [REP4-074]. As yet, the Applicant has not provided any further information on this assessment or response to our Deadline 4 comments. However, we note that the Applicant intends to submit an updated ES Chapter 12 (Offshore Ornithology chapter) at Deadline 5. Following a call with the Applicant on 06.03.25, we understand that the updates to the ES Chapter will include updates to the Great Orme's Head SSSI assessment accounting for the advice provided by NRW (A) in REP4-074. Therefore, we will provide comments/advice regarding impacts to the Great Orme's Head SSSI features following detailed review of the Applicant's Deadline 5 submissions.

Marine Mammals

2. Marine Mammal Comments on Morecambe Applicant Deadline 4 Submissions

2.1 Issues that NRW (A) considers require resolution before agreeing to overall conclusions

10. NRW (A) considers that there are four key issues requiring resolution before we can agree to the overall conclusions in this assessment. These are best presented as:
 - All issues relating to the cumulative assessment (CEA) and in-combination assessment;
 - Issues relating to the Marine Mammals Mitigation Plan (MMMP) and Under Water Sound Management Strategy (UWSMS).
11. Additionally, some minor issues from our response at Deadline 4 remain (see paragraphs 28-77 below / paragraphs 69-72 & paragraph 101 [REP4-074]), but do not affect our agreement with any conclusions.

2.2 All issues relating to the cumulative and in-combination assessment

12. NRW (A) has previously commented and presented its views on these issues at Deadlines 1, 3, and 4 [REP1-099, REP3-094 & REP4-074]. Our views on the methodology and evidence are unchanged and we still do not agree with the Applicant's overall approach or the thinking underpinning it. These issues remain primarily concerned with the methodology used to reach the conclusions, and the importance of presenting / documenting the correct numbers of animals disturbed for future cumulative assessments, and do not signify a definite disagreement on the overall conclusions. As previously discussed with the Applicant we recognise that there is currently a lack of methodology available to quantify the long-term cumulative population effects of:
 - a) All other impact pathways for both the project alone and for all projects together (except piling);
 - b) The additive effects of repeated instances of disturbance for a given impact pathway (except piling).
13. As previously discussed, any existing methods are either still in development or are only relevant to different marine areas (e.g. DEPONS), to this project. While our position on points (a) and (b) above remains the same as stated in our previous comments, we believe that a compromise approach may be agreed. Below, we outline three potential

ways forward, with the second considered to be the most pragmatic solution at this point in the examination process:

- **Respond to and meet our requests from our Deadline 4 submissions [REP4-074] for further assessment** – While this would be the most robust option, we acknowledge that it would be very challenging at this stage of the examination;
- **Agree to disagree with the methodology but conditionally accept the overall conclusions** - Given the scale of the impacts and the location outside of Welsh waters NRW (A) can agree to disagree on the specific methodology, but could agree with the overall assessment conclusions if the applicant updates their assessment to make it explicit that:
 - For each impact pathway in the CEA all numbers disturbed were snapshots at a single point in time (this is to make it clear for future projects in future CEAs that these were not total numbers);
 - The applicant updates their assessments to state that conclusions on both (a) and (b) are explicitly based on the Applicant's expert judgement;
- **A “do nothing scenario”** – NRW (A) would not be able to reach an agreement on either the conclusions of the assessment, or the methodology.

2.3 All issues relating to the draft Marine Mammal Mitigation Protocol (MMMP) - Revision 03 (Volume 6) [REP4-027/028] and Outline Underwater Sound Management Strategy - Revision 02 (Volume 9) [REP4-049/050]

14. NRW (A) previously commented and presented our views on the MMMP and UWSMS issues, and our concerns regarding residual injury from piling not being sufficiently mitigated at Deadlines 1 and 3 [REP1-099 & REP3-094].
15. In line with previous comments, we still agree that, in principle, the UWSMS identifies all potential noise sources associated with the project, with further details provided in associated mitigation plans. While we acknowledged that further significant detail cannot be provided at this time, we agree that the UWSMS should reduce the magnitude of impacts to an acceptable level. We also agree that the UWSMS should be conditioned through both the deemed Marine Licence (dML) and standalone Marine Licence (ML). We welcome the opportunity to engage with the Applicant on developing the UWSMS both during the examination and post-consent.
16. NRW (A) further acknowledge that the purpose of the draft MMMP is to demonstrate the principles of the final MMMP for piling, which could be required post-consent. We also acknowledge that the final MMMP will include details of embedded mitigation, such as the soft-start and ramp-up procedures, as well as details of the monitoring area (MA) and any additional mitigation measures required to minimise potential impacts of any physical injury or permanent threshold shift (PTS). We also acknowledge the Applicant's

commitment to using the best practicable means at the time to mitigate the potential impacts of the Project. Finally, we recognise that the methods for establishing the MA and reducing the potential impacts of piling operations would be agreed with the MMO, in consultation with relevant stakeholders, and secured as commitments in the final MMMP.

17. NRW (A) considers that there are two key issues outstanding which concern:
 - a) Unexploded ordnance (UXO) mitigation and further alignment of the MMMP and UWSMS with DEFRA (2025) joint statement;
 - b) A commitment to the use of noise abatement systems (NAS) to mitigate residual impacts, given that the current MMMP is reliant on acoustic deterrent devices (ADDs) operating for 80 minutes at the extent of their effective range. In our view, this approach does not meet our recommendation for “proportionate and judicious application of ADDs” (paragraph, 45 [REP1-099]).
18. Regarding UXO's, NRW (A) request that the language used and procedures described in the MMMP and UWSMS are amended further to match and fully align with that used in DEFRA's updated UXO Joint Position Statement (DEFRA 2025). The new position statement is far more explicit regarding low order clearance being the default as opposed to the “preferred” option, with high order being a last resort only used in extraordinary circumstances. The statement is also highly prescriptive about the additional information that needs to be provided for a marine licence application. In our view, this has not yet been sufficiently captured in the MMMP and UWSMS.
19. NRW (A) acknowledge and welcome the Applicant's commitment to the use of primary and/or secondary measures if residual impacts remain that need to be further mitigated. We also welcome the Applicant's commitment to the application of noise reduction such as Noise Abatement Systems (NAS) for its ES worst-case scenario (i.e., maximum strike rate with maximum hammer energy). NRW (A) can agree that our issue with respect to unmitigated residual PTS impacts can be considered resolved.
20. We note the Applicant's acknowledgement of the joint statement by JNCC, NE, and CEFAS on the use of noise reduction methods when piling, as well as their acknowledgement of DEFRA's marine noise policy paper.
21. The joint JNCC, NE, and CEFAS policy advises that quieter installation methods and/or NAS should always be considered as primary and/or secondary mitigation measures when planning impact piling in the marine environment. The policy paper also confirmed that options for using quieter installation methods and NAS are logistically feasible throughout UK shelf seas and are available to developers undertaking impact piling in UK waters.
22. The policy also notes that application of these technologies as a condition in future Development Consent Order (DCO) / deemed Marine Licences (dML) is ‘necessary’. It further recommends that regulators introduce a requirement that European Protected Species (EPS) licences for disturbance to cetacean EPS species from offshore wind pile driving will only be accepted if quieter installation methods and/or NAS are

considered, to inform Test 2 of the application process, that there are no satisfactory alternatives.

23. The policy also advises the use of quieter installation methods and/or NAS should also be considered as standard practice in MMMPs to reduce the risk of injury as well as disturbance, thereby reducing the need for EPS licences for injury.
24. DEFRA's marine noise policy paper states: *"From January 2025, given the expected increase in noise levels over the coming years, and the above outlined policy commitments, we expect that all offshore wind pile driving activity across all English waters will be required to demonstrate that they have utilised best endeavours to deliver noise reductions through the use of primary and / or secondary noise reduction methods in the first instance"*
25. Since the proposed project is entirely within English waters, and NRW is not signatory to these new policies, we defer to Natural England on this matter. However, based on our understanding, the current commitment to applying noise reduction, such as NAS for its ES worst-case scenario only, may be insufficient to meet the new policy requirements (i.e. "best endeavours" / "first instance"). NRW (A) recommend that the applicant should further align their approach with both policies.
26. We acknowledge and welcome the Applicant's statement that: *"duration and potential effect of the use of the ADD will be further considered post-consent in the final UWSMS, MMMP and EPS licence with consultation based on the most up to date available information"* (paragraph 126, [REP4-027]). However, we cannot agree that their proposed use of ADDs meets this statement and our request for "proportionate and judicious application of ADDs in terms of deployment duration" (paragraph 45, [REP1-099]).
27. In the MMMP, for its ES worst case scenario, the Applicant bases its mitigation on ADD deployment as its principal mitigation method. We argue that deployment of an ADD for 80 minutes, at the extent of its known effective range in an effort to cover the entire injury range cannot be said to meet *"the need to minimise the additional noise introduced into the environment"* (JNCC 2022). Nor can be said to be *"proportionate and judicious"*. Furthermore, the JNCC (2022) report highlights an EPS licence may be required of an Applicant to deploy ADDs for such a long time and potentially disturb a large number of animals. Therefore, NRW (A) recommend that the Applicant to consider and prioritise the use of NAS.

2.4 NRW's Response to Applicant's Comments on Deadline 3 Submissions by Interested Parties [REP4-058]

28. NRW (A) notes that where previous Written Representations (WR) have not been included, agreement on the issue has already been reached and we consider the issue closed. The majority of still active issues are largely concerned with the CEA/In-

Combination Assessment, or the MMMP and UWSMS. Therefore, to avoid an overly lengthy submission, our responses will direct the reader to paragraphs 10-27.

29. WR-099-48: NRW (A) direct you to our response in paragraphs 14-27.
30. WR-099-50: NRW (A) direct you to our response in paragraphs 14-27.
31. WR-099-51: NRW (A) note the applicant's response and consider this issue closed.
32. WR-099-52: NRW (A) note the applicant's response and consider this issue closed.
33. WR-099-54: NRW (A) note the applicant's updated chapters provided at Deadline 4, and consider this issue closed.
34. WR-099-55: While the Applicant is correct that for this Development Consent Order (DCO) Application, the windfarm site is not within a Special Area of Conservation (SAC), our future guidance is intended to also apply to both SACs and Management Units (MU) for which the windfarm site is located within a number of. NRW (A) have no additional comments on the matter, having provided a response at Deadline 4 (paragraph 74, [REP4-074]). This issue remains primarily a recommendation for future assessments.
35. WR-099-56: NRW (A) have no further comments and consider the matter closed.
36. WR-099-57 - 58: NRW (A) acknowledge and welcome the Applicant's statement that the *"duration and potential effect of the use of the ADD will be further considered post-consent in the final UWSMS, MMMP and EPS licence with consultation based on the most up to date available information"*. NRW (A) refer the reader to our response in paragraphs 14-27.
37. WR-099-59: NRW (A) appreciate the in-depth response from the Applicant and consider this matter closed. With regard to matters related to the cumulative assessment, we refer to our response in paragraphs 10-13.
38. WR-099-61: NRW (A) direct you to our response in paragraphs 10-13.
39. WR-099-65 - 67: NRW (A) direct you to our response in paragraphs 10-13.
40. WR-099-68: Here NRW(A) wish to clarify that our mention of the DEPONS model was not a suggestion to apply a model from one sea region to other sea regions. The point being made here is that the scientific community already recognises that repeated disturbance from vessel noise may have an effect larger than disturbance from one vessel. This recognition was sufficient for people to develop models to include ways to gauge these impacts (DEPONS being one such example). NRW(A) have no further comments to make on this issue and refer the reader to our response in paragraphs 10-13.
41. WR-099-69 - 70: NRW (A) direct you to our response in paragraphs 10-13.

42. WR-099-71: NRW (A) note the applicant's response and consider this issue closed.
43. WR-099-72: NRW (A) note the applicant's response and consider this issue closed.
44. WR-099-74: Considering the additional information and updates provided, NRW (A) consider this issue closed. NRW (A) direct you to our response in paragraphs 14-27.
45. WR-099-75: NRW (A) note the applicant's response and consider this issue closed. However, we also refer you to our response submitted at Deadline 4 (paragraph 73, [REP4-074])
46. WR-099-76 - 78: NRW (A) direct you to our response in paragraphs 10-13.
47. WR-099-80 - 81: NRW (A) note the applicant's response and consider this issue closed.
48. WR-099-82: NRW (A) direct you to our response in paragraphs 10-13.
49. WR-099-83 - 85: NRW (A) consider these issues closed.
50. WR-099-86: NRW(A) had previously submitted comments for Deadline 3 on this issue (paragraph 74, [REP3-094]).
51. WR-099-87: NRW (A) direct you to our response in paragraphs 10-13.
52. WR-099-88: NRW (A) note the applicant's response and consider this issue closed. We refer to paragraphs 14-27 for further comments on the MMMP and UWSMS.
53. WR-099-89: NRW (A) note the applicant's response and consider this issue closed.
54. WR-099-90: NRW (A) note the applicant's response and consider this issue closed. We refer to paragraphs 14-27 for further comments on the MMMP and UWSMS.
55. WR-099-92: As of Deadline 5, NRW (A) considers this issue closed.
56. WR-099-93: NRW (A) note the applicant's response and consider this issue closed. We refer to paragraphs 14-27 for further comments on the MMMP and UWSMS.
57. WR-099-94: NRW (A) note the applicant's response and consider this issue closed.
58. WR-099-95: NRW (A) note the applicant's response and consider this issue closed. We refer to paragraphs 14-27 for further comments on the MMMP and UWSMS.
59. WR-099-96: NRW (A) note the applicant's response, given that the issue is no longer under consideration by NE, there are no further comments.
60. WR-099-97: With respect to the in-combination assessment, please refer to our comments in paragraphs 10-13.

61. WR-099-98: As of Deadline 5, NRW(A) consider this issue closed. We can confirm that in line with previous comments, we are in support of all proposed monitoring schemes presented by the Applicant.
62. WR-099-99 - 104: NRW (A) refer to paragraphs 14-27 for further comments on the MMMP and UWSMS.
63. REP3-094-39: NRW (A) have no further comments on the Outline Vessel Traffic Management plan, issue is considered closed.
64. REP3- 094-40 - 42: With regard to our original comments on the draft MMMP we direct you to our response in paragraphs 14-27.

2.5 Updates to NRW's Deadline 4 Submission [REP4-074]:

65. Paragraphs 66-67: We previously highlighted the updated Joint Position Statement on UXO clearance to the Applicant. The reader is referred to our detailed response and comments on the revised MMMP and UWSMS in paragraphs 14-27 above.
66. Paragraph 68: We previously advised the Applicant to include a commitment to the use of NAS to mitigate residual impacts. The reader is referred to our detailed response and comments on the revised MMMP and UWSMS in paragraphs 14-27 above.
67. Paragraphs 69-70: Issue requires addressing and we await the Applicant's response at Deadline 5. We note that this issue remains a technical one and does not impact our agreement to any conclusions.
68. Paragraphs 71-72: Issue requires addressing and we await the Applicant's response at Deadline 5. We note that this issue remains a technical one and does not impact our agreement to any conclusions.
69. Paragraph 73: Recommendation should ideally be addressed although this is not major and will not impact our agreement to any conclusions.
70. Paragraph 74: We note that the issue raised here is primarily a recommendation for future assessments, thus as originally noted no changes are required and we do not expect the Applicant to complete a reassessment.
71. Paragraph 75: This was an overarching paragraph referring to Cumulative effects from all noise activities, including Paragraphs 76-83; 85-92; 93-99; 102. We refer the reader to our detailed response and comments on the cumulative and in combination assessments in paragraphs 10-13 above and expect this issue to be addressed shortly.
72. Paragraph 84: NRW (A) has no further comments and consider this issue closed.
73. Paragraph 100: The reader is referred to our detailed response in paragraphs 14-27 above.

74. Paragraph 101: Issue requires addressing and we await the Applicant's response at Deadline 5, although we note that we would not expect major changes in the conclusion.
75. Paragraph 102: This point refers to the amendments made for the in-combination assessment. Given that the issues raised for the CEA are also relevant to the in-combination assessment, the reader is referred to our detailed response in paragraphs 10-13 above.
76. Paragraphs 103 to 116 – NRW (A) consider these issues closed based on amendments made to the MMMP and UWSMS.
77. Paragraph 117: NRW (A) has no further comments and consider this issue closed.

3. References

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4. Appendix 1: Report to Inform Appropriate Assessment - Revision 03 (Volume 4) [REP4-009/010]: NRW (A) detailed comments on HRA scale alone and in-combination impacts for relevant Welsh sites

78. This document is a technical document submitted into the Morecambe Generation Assets project Examination to provide scientific justification for NRW (A)'s advice on the significance of the potential impacts for Habitats Regulations Assessment (HRA) scale issues from the project alone and in-combination with other plans and projects for Welsh designated sites, incorporating information from the Applicant's updated RIAA [REP4-009], as summarised within each section. Our advice is based on best available evidence at the time of writing and may be subject to change in the future should further evidence be presented.

4.1.1 Glannau Aberdaron ac Ynys Enlli/Aberdaron Coast and Bardsey Island (AC & BI) SPA: Manx shearwater

Project Alone Impacts

79. NRW (A) welcome the Applicant's updates to the apportioned project alone impacts and assessment of displacement for the Manx shearwater feature of this SPA in Section 8.21.3.1 of the updated RIAA [REP4-009]. We note that the Applicant has updated the SPA colony count to include the latest Seabird Count Census (Burnell et al. 2023) of 41,350 breeding adults. Based on the predicted impacts in Table 8-47 [REP4-009], the calculated project alone displacement total is 1-32 adult Manx shearwaters from the Glannau Aberdaron ac Ynys Enlli/Aberdaron Coast & Bardsey Island (AC & BI) SPA per annum (based on mean abundance and 30-70% displacement and 1-10% mortality). This equates to 0.03-0.59% of baseline mortality for the Abadaron Coast (AC) & Bardsey Island (BI) SPA Manx shearwater colony. Our advice remains as detailed in our Deadline 4 response (see paragraph 41 [REP4-074]), that we can agree with the Applicant that **there would be no adverse effect on site integrity (AEoSI) for predicted displacement impacts on the Manx shearwater feature of the AC & BI SPA from the project alone.**

In-Combination Impacts

As noted in *Section 0* above, there are discrepancies between the Morecambe alone assessment figures and those included for this project in the in-combination assessment, along with the omission of the Barrow, North Hoyle and Rhyl Flats projects. However, we consider that these issues do not materially affect the in-combination assessment or conclusions.

80. The Applicant has calculated that an in-combination total of 1,146 Manx shearwaters from the AC & BI SPA are at risk of displacement (Table 8-48 [REP4-009]). Table 8-49 of REP4-009, estimates that the calculated in-combination displacement total is 3-80 adult Manx shearwaters from the AC & BI SPA per annum (based on 30-70% displacement and 1-10% mortality). This equates to up to 1.49% of baseline mortality for the AC & BI SPA Manx shearwater colony for the worst case scenario (WCS) predicted impact. This is significant at the upper end of the range and therefore requires further consideration. We therefore welcome that the Applicant has undertaken an AC & BI SPA Manx shearwater in-combination displacement Population Viability Assessment (PVA) assessment for both their preferred % displacement and % mortality rate impact (i.e. 50% displacement and 1% mortality) and for the WCS impact (i.e. 70% displacement and 10% mortality).
81. The AC & BI SPA Manx shearwater numbers have increased by 28% from Seabird 2000 to the most recent Seabird Count Census (Burnell et al. 2023): Seabird 2000 Census count of 16,183 Apparently Occupied Sites (AOS) (32,366 adults) undertaken in 2001, Seabirds Count Census count of 20,675 AOS (41,350 adults) undertaken in 2015. During this time many of the OWFs included in the in-combination assessments have been constructed and become operational. As the colony population has continued to increase, it suggests they have not been adversely impacted by the operational OWFs. Additionally, the PVA suggests that for an impact of up to 80 Manx shearwaters per annum (predicted impact for worst case scenario of 70% displacement and 10% mortality), the Manx shearwater population of the SPA will continue to grow, even with the additional impact from the OWFs, as indicated by a growth rate above 1, and the Counterfactual of Growth Rate (CPGR) is 0.9978 (see Table 8-50 [REP4-009]). This suggests that even at the WCS of 70% displacement and 10% mortality there will be only a small impact on the growth rate in comparison to baseline conditions. Hence there will remain a thriving Manx shearwater population at the site and the Conservation Objective for the Manx shearwater target population of 20,000 adults (10,000 pairs)¹ at this site would be achieved. On this basis, **NRW advises that an adverse effect on site integrity (AEoSI) can be ruled out for predicted displacement impacts on the Manx shearwater feature from the project in-combination with other plans and projects for the AC & BI SPA.**

4.1.2 Sgomer, Sgogwm a Moroedd Penfro/Skomer, Skokholm and seas off Pembrokeshire (SSSP) SPA: Manx shearwater

Project Alone Impacts

82. NRW (A) welcome the Applicant's updates to the apportioned project alone impacts and assessment of displacement for the Manx shearwater feature of this SPA in Section 8.32.3.1 of the updated RIAA [REP4-009]. Based on the predicted impacts provided in Table 8-83 [REP4-009], the calculated project alone displacement total is 12-288 adult Manx shearwaters from the SSSP SPA per annum (based on mean abundance and 30-70% displacement and 1-10% mortality). This equates to 0.01-0.24% of baseline

¹ Currently available conservation objective target populations for Aberdaron Coast and Bardsey Island SPA available from: <https://naturalresources.wales/media/672092/glannau-aberdaron-plan-english.pdf>

mortality for the SSSP SPA Manx shearwater colony. This level of impact is well below 1% of baseline mortality for the SSSP SPA Manx shearwater colony and can be considered undetectable against background mortality. Therefore, our advice remains as detailed in our Deadline 4 response (see paragraph 48 [REP4-074]). NRW (A) can agree that there **would be no adverse effect on site integrity (AEoSI) for predicted displacement impacts on the Manx shearwater feature of the SSSP SPA from the project alone.**

In-Combination Impacts

83. As noted in *Section 1.1.2* above, there are discrepancies between the Morecambe alone assessment figures and those included for this project in the in-combination assessment, along with the omission of the Barrow, North Hoyle and Rhyl Flats projects. However, we consider that these issues do not materially affect the in-combination assessment or conclusions.
84. The Applicant has calculated that an in-combination total of 27,603 Manx shearwaters from the SSSP SPA are at risk of displacement (Table 8-84 [REP4-009]). From Table 8-85 [REP4-009], the calculated in-combination displacement total is 831,932 adult Manx shearwaters from the SSSP SPA per annum (based on 30-70% displacement and 1-10% mortality). This equates to up to 1.63% of baseline mortality for the SSSP SPA Manx shearwater colony for the WCS predicted impact. This is significant at the upper end of the range and therefore requires further consideration. We welcome that the Applicant has within [REP4-009] undertaken an SSSP SPA Manx shearwater in-combination displacement PVA assessment for both their preferred % displacement and % mortality rate impact (i.e. 50% displacement and 1% mortality) and for the WCS impact (i.e. 70% displacement and 10% mortality).
85. Manx shearwater numbers at the SSSP SPA have increased by 201% from Seabird 2000 to the most recent Seabird Count Census (Burnell et al. 2023): Seabirds 2000 Census count of 151,000 Apparently Occupied Sites (AOS) (302,000 adults) undertaken in 1998, Seabirds Count Census count of 455,156 AOS (910,312 adults) undertaken in 2018. During this time many of the OWFs included in the in-combination assessments have been constructed and become operational. As the colony population has continued to increase, it suggests they have not been adversely impacted by the operational OWFs. Additionally, the PVA suggests that for an impact of up to 1,932 Manx shearwaters per annum (predicted impact for WCS of 70% displacement and 10% mortality), the Manx shearwater population of the SPA will continue to grow, even with the additional impact from the OWFs, as indicated by a growth rate above 1, and the Counterfactual of Growth Rate is 0.9976 (see Table 8-86 of REP4-009). This suggests that there will be only a small impact on the growth rate in comparison to baseline conditions. Hence the Conservation Objective for the Manx shearwater target population of 300,000 adults (150,000 pairs)² at this site would be achieved. On this basis, **NRW (A) can agree that an AEoSI can be ruled out for predicted**

² Currently available conservation objective target populations for SSSP SPA available from:
<https://naturalresources.wales/media/673958/Skomer.Skokholm%20management%20plan%2007.pdf>

displacement impacts on the Manx shearwater feature from the project in-combination with other plans and projects for the SSSP SPA.

4.1.3 Sgomer, Sgogwm a Moroedd Penfro/Skomer, Skokholm and seas off Pembrokeshire (SSSP) SPA: European Storm Petrel

NRW (A) agree with the Applicant's assessment in Section 8.32.3.2 [REP4-099] that there would be no measurable effects on storm petrel due to the project alone and hence there would be no contribution to any in-combination effects on this feature. Therefore, **NRW (A) can agree that an AEoSI can be ruled out for predicted impacts on the European storm petrel feature from the project alone and in-combination with other plans and projects for the SSSP SPA.**

4.1.4 Sgomer, Sgogwm a Moroedd Penfro/Skomer, Skokholm and seas off Pembrokeshire (SSSP) SPA: Puffin

Project Alone Impacts

86. Based on the predicted impacts in Table 8-87 [REP4-009], the calculated project alone displacement total is 0-2 adult puffins from the SSSP SPA per annum (based on mean abundance and 30-70% displacement and 1-10% mortality). This equates to 0.00-0.04% of baseline mortality for the SSSP SPA puffin colony. This level of impact is well below 1% of baseline mortality for the SSSP SPA puffin colony and can be considered undetectable against background mortality. Therefore, the Conservation Objective target population of 19,000 individuals (9,500 pairs)² would be achieved. NRW (A) agree with the Applicant that **an AEoSI can be ruled out for displacement from the project alone to the puffin feature of the SSSP SPA** (as was indicated in paragraph 20 of our Written Representations [REP1-099]).

In-Combination Impacts

87. NRW (A) also consider that an **AEoSI from the project in-combination with other plans and projects can be ruled out** for the puffin feature of the SPA on the basis that mortalities due to the project alone constitute less than a 0.1% increase in baseline mortality.

4.1.5 Sgomer, Sgogwm a Moroedd Penfro/Skomer, Skokholm and seas off Pembrokeshire (SSSP) SPA: Lesser black-backed gull (LBBG)

Project Alone Impacts

88. Based on Table 8-88 [REP4-009], the calculated project alone collision total is 0.13 adult LBBGs from the SSSP SPA per annum. Based on a colony size of 16,694 adults and an adult mortality rate of 11.5%, as used by the Applicant in Table 8-88 [REP4-009], this predicted impact equates to 0.01% of baseline mortality, rather than the 0.11% as stated in Table 8-88. This level of impact is well below 1% of baseline mortality for the SSSP SPA LBBG colony and can be considered undetectable against background

mortality. Hence, NRW (A) agree with the Applicant that **an AEoSI can be ruled out for collision risk from the project alone to the Lesser black-backed gull (LBBG) feature of the SSSP SPA** (as was indicated in paragraph 20 of our Written Representations [REP1-099]).

In-Combination Impacts

89. NRW (A) note that the Applicant has taken this site and feature combination through to an in-combination assessment. We assume the assessment uses the Applicant's weighted mean annual apportionment rate calculation approach for each OWF project. However, we reiterate our concerns raised regarding this approach and the potential for underestimating impacts in Section 1.4.1.2 of our Deadline 4 response [REP4-074]. We repeat that we do not recommend that future projects follow the Applicant's approach to apportioning for in-combination assessments in the RIAA [REP4-009].
90. As noted in *Section 4.1.5* above there is an error in the Applicant's calculation in Table 8-88 [REP4-009] for the project alone mortality increase. The Applicant has calculated that the project alone predicted impact of 0.13 collisions (range, based on 95% confidence intervals, CIs: 0.00-0.62), equates to 0.11% (range: 0.00-0.53%) of baseline mortality. Based on this, this has triggered the consideration of an in-combination assessment.
91. However, using a colony population of 16,694 adult LBBGs (2021 count) and an adult mortality rate of 11.5%, the estimated annual colony mortality equals 1,920 individuals per annum, which is used by the Applicant in REP4-009. Based on this, a predicted impact of 0.13 (range 0.00-0.62) collisions per annum from the project actually equates to 0.01% (range: 0.00-0.03%) of baseline mortality for the colony (as noted in *Section 4.1.5* above).
92. The Applicant's approach to in-combination screening is that where the project alone impact equates to below 0.1% baseline mortality then it is deemed non-material and within natural fluctuations of the population and is therefore screened out of in-combination assessment. We have indicated that we are content with the Applicant's approach in this case where the impacts from the project alone are very small (see paragraph 17 of our Written Representations [REP1-099]). Based on the corrected calculations above, as the project alone impact constitutes less than a 0.1% increase in baseline mortality, even at the upper 95% CI predicted impact, we also consider that **AEoSI from the project in-combination with other plans and projects can be ruled out** for the LBBG feature of the SPA. We also note that the Morecambe project alone predicted impact of 0.13 SSSP SPA LBBG collisions per annum, is very similar to the Mona and Morgan Generation Assets predicted project alone SSSP SPA LBBG collision impacts of 0.2 and 0.1 birds per annum for each project respectively. At both of these projects, we were able to reach similar conclusions with regard to in-combination impacts to that concluded here.
93. The error noted above has been discussed by NRW (A) on a call with the Applicant's consultant on 03.03.2025 and the Applicant has confirmed the error. We understand

that the Applicant intends to correct this error in an updated version of the RIAA to be submitted into the examination at Deadline 5.

4.1.6 Sgomer, Sgogwm a Moroedd Penfro/Skomer, Skokholm and seas off Pembrokeshire (SSSP) SPA: Seabird Assemblage

4.1.6.1 Kittiwake (named component of the assemblage feature)

Project Alone Impacts

94. Based on Table 8-90 [REP4-009], the project alone collision total calculated by the Applicant is 0.07 adult kittiwakes from the SSSP SPA per annum. This predicted collision impact equates to 0.02% of baseline mortality of the SPA kittiwake colony. This level of impact is well below 1% of baseline mortality for the SSSP SPA kittiwake colony and can be considered undetectable against background mortality and the Conservation Objective target population for the seabird assemblage of 67,000 individuals² would be achieved. Hence, NRW (A) can agree with the Applicant that **an AEoSI can be ruled out for collision risk from the project alone to the kittiwake component of the seabird assemblage feature of the SSSP SPA** (as was indicated in paragraph 20 of our Written Representations [REP1-099]).

In-Combination Impacts

95. NRW (A) consider that **AEoSI from the project in-combination with other plans and projects can be ruled out** for this component of the seabird assemblage feature of the SPA on the basis that mortalities due to the project alone constitute less than a 0.1% increase in baseline mortality.
96. However, as kittiwake is not a qualifying feature of the SSSP SPA in its own right, it is a named component of the seabird assemblage feature, this should be considered in the wider context of the assemblage feature and consideration of the assemblage feature Conservation Objectives. Therefore, see *Section 4.1.6.4* below for the overall conclusion of significance of effect on the assemblage qualifying feature.

4.1.6.2 Guillemot (named component of the assemblage feature)

Project Alone Impacts

97. Based on Table 8-91 [REP4-009], the calculated project alone displacement total is 1-15 adult guillemots from the SSSP SPA per annum (based on 30-70% displacement and 1-10% mortality). This equates to 0.03-0.65% of baseline mortality for the SSSP SPA guillemot colony. This level of impact is below 1% of baseline mortality for the SSSP SPA guillemot colony and can be considered undetectable against background mortality and the Conservation Objective target population for the seabird assemblage of 67,000 individuals² would be achieved. Hence, NRW (A) can agree that **an AEoSI can be ruled out for displacement from the project alone to the guillemot component of the seabird assemblage feature of the SSSP SPA** (as was indicated in paragraph 20 of our Written Representations [REP1-099]).

In-Combination Impacts

98. We note our comments in *Section 1.1.2* above regarding the lack of inclusion of the Barrow, North Hoyle and Rhyl Flats projects. However, we consider that these issues do not materially alter the in-combination assessment conclusions.
99. The Applicant has calculated that an in-combination total of 10,564 guillemots from the SSSP SPA are at risk of displacement (Table 8-92 [REP4-009]). From Table 8-93, the calculated in-combination displacement total is 32-739 adult guillemots from the SSSP SPA per annum (based on 30-70% displacement and 1-10% mortality). If the additional apportioned mortality from the Morlais and Holyhead tidal projects (total 0.82 birds) is also added, then the total predicted mortality of up to 740 (rounded to whole birds) equates to up to 31.9% of baseline mortality for the SSSP SPA guillemot colony for the WCS predicted impact. This is significant at the upper end of the range and therefore requires further consideration. NRW (A) welcome that the Applicant has undertaken an SSSP SPA guillemot in-combination displacement PVA assessment for both their preferred % displacement and % mortality rate impact (i.e. 50% displacement and 1% mortality) and for the WCS impact (i.e. 70% displacement and 10% mortality).
100. The count data from seabird 2000 through to counts in 2022 shows an increase from 14,848 individual guillemots in 2000 to 37,305 individual guillemots in 2022. Over this time many of the OWFs included in the in-combination assessments have been constructed and become operational. Hence as the colony population has continued to increase, it would suggest they have not been adversely impacted by the operation of the OWFs. Additionally, the PVA suggests that for an impact of up to 740 guillemots per annum (predicted impact for WCS of 70% displacement and 10% mortality plus mortality from tidal projects), the guillemot population of the SPA will continue to grow beyond its current level, even with the additional impact from the OWFs, as indicated by a growth rate above 1, and the Counterfactual of Growth Rate is 0.978 (see Table 8-94 [REP4-009]). This suggests that even at the WCS of 70% displacement and 10% mortality there will be only a small impact on the growth rate in comparison to baseline conditions. Hence there will remain a thriving guillemot population at the site and the Conservation Objective target population for the seabird assemblage of 67,000 individuals^{Error! Bookmark not defined.} would be achieved. NRW (A) can agree with the Applicant that **an AEOI can be ruled out for the guillemot component of the seabird assemblage feature of the SSSP SPA** for predicted displacement impacts from the project in-combination with other plans and projects.
101. However, as guillemot is not a qualifying feature of the SSSP SPA in its own right, it is a named component of the seabird assemblage feature, this should be considered in the wider context of the assemblage feature and consideration of the assemblage feature Conservation Objectives. Therefore, see *Section 4.1.6.4* below for the overall conclusion of significance of effect on this qualifying feature.

4.1.6.3 Razorbill (named component of the assemblage feature)

Project Alone Impacts

102. Based on Table 8-95 [REP4-009], the calculated project alone displacement total is 0-2 adult razorbills from the SSSP SPA per annum (based on 30-70% displacement and 1-10% mortality). This equates to 0.01-0.13% of baseline mortality for the SSSP SPA razorbill colony. This level of impact is below 1% of baseline mortality for the SSSP SPA razorbill colony and can be considered undetectable against background mortality and the Conservation Objective target population for the seabird assemblage of 67,000 individuals² would be achieved. Hence, NRW (A) agree with the Applicant that **an AEoSI can be ruled out for displacement from the project alone to the razorbill component of the seabird assemblage feature of the SSSP SPA** (as was indicated in paragraph 20 of our Written Representations [REP1-099]).

In-Combination Impacts

103. NRW (A) note our comments in *Section 1.1.2* above regarding the lack of inclusion of the Barrow, North Hoyle and Rhyl Flats projects. However, we consider that these issues do not materially alter the in-combination assessment conclusions.
104. The Applicant has calculated that an in-combination total of 510 razorbills from the SSSP SPA are at risk of displacement (Table 8-96 [REP4-009]). From Table 8-97 of REP4-009, the calculated in-combination displacement total is 2-36 adult razorbills from the SSSP SPA per annum (based on 30-70% displacement and 1-10% mortality). If the additional apportioned mortality from the Morlais and Holyhead tidal projects (total 0.27 birds) is also added, then the total predicted mortality of up to 36 (rounded to whole birds) equates to up to 2.4% of baseline mortality for the SSSP SPA razorbill colony for the WCS predicted impact. This is significant at the upper end of the range and therefore requires further consideration. Therefore, NRW (A) welcome that the Applicant has undertaken an SSSP SPA razorbill in-combination displacement PVA assessment for both their preferred % displacement and % mortality rate impact (i.e. 50% displacement and 1% mortality) and for the WCS impact (i.e. 70% displacement and 10% mortality).
105. The count data from seabird 2000 through to counts in 2022 shows an increase from 5,140 individual razorbills in 2000 to 14,157 individual razorbills in 2022. Over this time many of the OWFs included in the in-combination assessments have been constructed and become operational. Hence as the colony population has continued to increase, it would suggest they have not been adversely impacted by the operation of the OWFs. Additionally, the PVA suggests that for an impact of up to 36 razorbills per annum (predicted impact for WCS of 70% displacement and 10% mortality plus mortality from tidal projects), the razorbill population of the SPA will continue growing beyond its current level, even with the additional impact from the OWFs, as indicated by a growth rate above 1, and the Counterfactual of Growth Rate is 0.997 (see Table 8-98 [REP4-009]). This suggests that even at the worst-case scenario of 70% displacement and 10% mortality there will be only a small impact on the growth rate in comparison to baseline conditions. Hence, NRW (A) can agree with the Applicant that **an AEoSI can be ruled out for the razorbill component of the seabird assemblage feature of the SSSP SPA** for predicted displacement impacts from the project in-combination with other plans and projects.

106. However, as razorbill is not a qualifying feature of the SSSP SPA in its own right, it is a named component of the seabird assemblage feature, this should be considered in the wider context of the assemblage feature and consideration of the assemblage feature Conservation Objectives. Therefore, see *Section 4.1.6.4* below for the overall conclusion of significance of effect on this qualifying feature.

4.1.6.4 Seabird Assemblage

107. The seabird assemblage is a qualifying feature of the SSSP SPA in its own right. The Conservation Objective for the seabird assemblage feature states that:

During the breeding season the SPA will regularly support at least 67,000 individual seabirds of the following species, most of which also qualify independently as SPA features:

- Puffin
- Manx shearwater
- European storm petrel
- Lesser black-backed gull
- Guillemot
- Razorbill
- Kittiwake

108. Based on the above, it has been demonstrated that the component species of the assemblage are unlikely to be significantly affected by impacts from the project alone. Additionally, the growth rates of Manx shearwater, guillemot and razorbill are unlikely to be significantly affected over the lifetime of the project as a result of in-combination impacts and will continue to be stable or increasing. On this basis NRW (A) consider that the abundance target (67,000 individuals)² of the assemblage will be met and that the diversity of species making up the assemblage is not at risk from the project alone and in-combination collision and displacement impacts from offshore wind farms. Therefore, the Conservation Objective can be met and NRW (A) advise **that an AEoSI of the seabird assemblage feature of the SSSP SPA can be ruled out for collision and displacement impacts from both the project alone and in-combination impacts.**

4.1.7 Grassholm SPA: Gannet

109. Following the updates to the assessment for this site and feature combination in REP4-009, the updated assessments are the same as previously in REP3-058. Hence our advice regarding Grassholm SPA gannet predicted impacts from both the project alone remain as set out in our Deadline 4 response (see Section 1.4.2.3 [REP4-074]); namely that **there would be no AEoSI for predicted displacement, collision and collision plus displacement impacts on the gannet feature of the Grassholm SPA from the project alone and in-combination with other plans and projects.**

4.1.8 All other Welsh SPAs/Ramsars screened into the RIAA

110. As was previously indicated in paragraph 20 of our Written Representations [REP1-099], NRW (A) agree with the Applicant's conclusions in REP4-009 that an AEoSI can be ruled out for the project alone and in-combination for the relevant remaining Welsh SPAs/Ramsars with marine ornithological qualifying features assessed in REP4-099, namely:
- Morwenoliaid Ynys Môn/Anglesey Terns SPA
 - Ynys Seiriol/Puffin Island SPA
 - Traeth Lafan/Lavan Sands, Conway Bay SPA
 - The Dee Estuary SPA/Ramsar
111. We again note that as the Morecambe Generation Assets project is located wholly in English waters, we defer comment/advice regarding predicted impacts and integrity judgements of the project alone and in-combination for all qualifying features of the Liverpool Bay SPA to NE.