Department for Energy Security & Net Zero

Habitats Regulations Assessment for an Application Under the Planning Act 2008

MONA OFFSHORE WIND PROJECT

Regulation 63, 64 and 68 of the Conservation of Habitats and Species Regulations 2017

Regulation 28, 29 and 36 of the Conservation of Offshore Marine Habitats and Species Regulations 2017

Regulation 125 of the Marine and Coastal Access Act 2009

July 2025

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List of Abbreviations

Term	Abbreviation
(draft) Development Consent Order	(d)DCO
Adverse Effect on Integrity	AEoI
Appropriate Assessment	AA
Appropriate Nature Conservation Bodies	ANCBs
Candidate Special Area of Conservation	cSAC
Deemed Marine Licence	DML
Development Consent Order	DCO
European Economic Area	EEA
Electro Magnetic Fields	EMF
Examining Authority	ExA
Exclusive Economic Zone	EEZ
Habitats Regulations Assessment	HRA
Highly Pathogenic Avian Influenza	HPAI
Interested Parties	IPs
Invasive Non-Native Species	INNS
Joint Nature and Conservation Committee	JNCC
Kilometre	km
Likely Significant Effect	LSE
Marine Mammal Mitigation Protocol	MMMP
Marine Nature Reserve	MNR
Megawatts	MW
National Site Network	NSN
Nationally Significant Infrastructure Project	NSIP
Natural Resources Wales	NRW
Outline Environmental Management Plan	OEMP
Planning Inspectorate	PINS
Potential Special Protection Area	pSPA
Proposed Ramsar Site	pRamsar
Report on the Implications for European Sites	RIES
Seabed Sediment Concentration	SSC
Site of Community Importance	SCI
Special Area of Conservation	SAC
Special Protection Area	SPA
Statement of Common Ground	SoCG
Statutory Nature Conservation Body	SNCB
Supplementary Advice on Conservation Objectives	SACO
The Conservation of Habitats and Species Regulations 2017	The Habitats Regulations
Underwater Sound Mitigation Strategy	UWSMS
Unexploded Ordnance	UXO

1. Introduction

1.1 Background

This is a record of the Habitats Regulations Assessment ("HRA") that the Secretary of State for the Department of Energy Security and Net Zero has undertaken under the Conservation of Habitats and Species Regulations 2017 ("the Habitats Regulations") (as amended) and the Conservation of Offshore Marine Habitats and Species Regulations 2017 (the Offshore Habitats Regulations) (as amended) in respect of the Development Consent Order ("DCO") and Deemed Marine Licences ("DMLs") of the Mona Offshore Wind Project along with its associated infrastructure. A separate Marine Licence for activities within the Welsh 12nm territorial waters is required and will be subject to a separate decision by NRW and is referred to in this HRA as the NRW Marine Licence.

The Examining Authority ("ExA") in its report describes this as the "Proposed Development". It is defined as the "Project" within this HRA for consistency with the terminology of the Habitats Regulations. For the purposes of these Regulations the Secretary of State is the competent authority.

The Project consists of a proposed offshore wind farm, which is expected to comprise up to 96 wind turbine generators. The Project will be located in the east Irish Sea, with a landfall on the North Wales Coastline and a connection to the Bodelwyddan Grid substation. At the closest points the array area is 28.8 kilometre ("km") from the north coast of Wales, 46.9 km from the northwest coast of England, and 46.6 km from the Isle of Man. The offshore export cable corridor will be approximately 46 km in length and the onshore export cable corridor (including 400 kV cable corridor) will be approximately 16 km in length.

The Project is within the UK's Exclusive Economic Zone ("EEZ"). The Project application is described in more detail in Section 2.

The proposed capacity of the Project is over 350 Megawatts ("MW"). The Project constitutes a nationally significant infrastructure project ("NSIP") as defined by s15(3B) of the Planning Act 2008 as it exceeds the 350MW threshold for Welsh offshore generating stations.

The Project was accepted for Examination by the Planning Inspectorate ("PINS") on 21 March 2024 and a five-member Panel of Inspectors was appointed as the ExA for the Application on 3 April 2024. On 14 June 2024, one member of the ExA resigned, and they were replaced. The Examination of the Project application began on 16 July 2024 and completed on 16 January 2025. The ExA submitted its report of the Examination, including its recommendation

("the ExA's report"), to the Secretary of State on 16 April 2025. Numbered references to the ExA's Report are presented in the format "[ER *.*.*]".

This HRA also contains a consideration of the potential effects of the Project upon protected sites in European Economic Area ("EEA") States ("transboundary sites"). This is described in more detail in Section 6.

1.2 Legislation

The Habitats Regulations and the Offshore Habitats Regulations aim to ensure the long-term conservation of certain species and habitats by protecting them from possible adverse effects of plans and projects.

In the UK, the Habitats Regulations apply as far as the 12 nautical miles (nm) limit of territorial waters. Beyond territorial waters, the Offshore Habitats Regulations serve the same function for the UK's offshore marine area. The Secretary of State notes the Project covers areas within and outside the 12 nm limit, so both sets of Regulations apply and hereafter will be referred to collectively as the Habitats Regulations.

The Habitats Regulations provide for the designation of sites for the protection of habitats and species of international importance. These sites are called Special Areas of Conservation ("SACs"). They also provide for the classification of sites for the protection of rare and vulnerable birds and for regularly occurring migratory species within the UK and internationally. These sites are called Special Protection Areas ("SPAs"). SACs and SPAs together from part of the UK's National Site Network ("NSN").

The Convention on Wetlands of International Importance 1972 ("the Ramsar Convention") provides for the listing of wetlands of international importance. These sites are called Ramsar sites. Government policy is to afford Ramsar sites in the United Kingdom the same protection as sites within the NSN (collectively referred to in this HRA as "protected sites").

Candidate SACs ("cSACs"), SACs and SPAs are afforded protection as protected sites. As a matter of policy[1] the Government affords potential SPAs ("pSPAs") the same level of protection.

Regulation 63 of the Habitats Regulations provides that:

…before deciding to undertake, or give any consent, permission or other authorisation for, a plan or project which (a) is likely to have a significant effect on a European site or a European offshore marine site (either alone or in-combination with other plans or projects), and (b) is not directly connected with or necessary to the management of that site, [the competent authority]

[1] 2024 NPS EN-1 page 173

must make an appropriate assessment of the implications for that site in view of that site's conservation objectives.

And that:

In the light of the conclusions of the assessment, and subject to regulation 64 [IROPI], the competent authority may agree to the plan or project only after having ascertained that it will not adversely affect the integrity of the European site or the European offshore marine site (as the case may be).

Regulation 28 of the Conservation of Offshore Marine Habitats and Species Regulations 2017 contains similar provisions:

Before deciding to undertake, or give any consent, permission or other authorisation for, a relevant plan or project, a competent authority must make an appropriate assessment of the implications of the plan or project for the site in view of that site's conservation objectives.

And that:

In the light of the conclusions of the assessment, and subject to regulation 29 [IROPI], the competent authority may agree to the plan or project only if it has ascertained that it will not adversely affect the integrity of the European offshore marine site or European site (as the case may be).

This Project is not directly connected with, or necessary to, the management of a protected site. The Habitats Regulations require that, where the Project is likely to have a significant effect ("LSE") on any such site, alone or in-combination with other plans and projects, an appropriate assessment ("AA") is carried out to determine whether the Project will have an adverse effect on the integrity ("AEoI") of the site in view of that site's conservation objectives. In this document, the following assessments are collectively referred to as the HRA:

- Stage 1: Assessment of LSE;
- Stage 2: AA to determine whether there is an AEoI of a site;

The Secretary of State has had regard to relevant guidance on the application of this HRA published by the PINS (2022) (Advice Note 10)[2] , the European Commission (2018)[3], joint guidance by Defra, NE, the Welsh Government and Natural Resources Wales (2021) on 'Habitats Regulations Assessment: protecting a European site' (the 2021 joint guidance).[4]

1.3 Site Conservation Objectives

Where an AA is required in respect of a protected site, regulation 63(1) of the Habitats Regulations (and regulation 28(1) of the Offshore Habitats Regulations) requires that it be an AA of the implications of the plan or project for the site in view of its conservation objectives. Government guidance also recommends that in carrying out the LSE screening, applicants must check if the proposal could have a significant effect on a protected site that could affect its conservation objectives.

Defra Guidance indicates that disturbance to a species or deterioration of a protected site must be considered in relation to the integrity of that site and its conservation objectives[5]. It states that *"the integrity of a site is the coherence of its ecological structure and function, across its whole area, that enables it to sustain the habitat, complex of habitats and/or the levels of populations of the species for which it was designated".*

Conservation objectives have been established by Natural England ("NE") for English sites, and by Natural Resources Wales ("NRW") and the Joint Nature Conservation Committee ("JNCC") for Welsh sites. When met, each site will contribute to the overall favourable conservation status of the species or habitat feature across its natural range. Conservation objectives outline the desired state for a protected site, in terms of the interest features for which it has been designated. If these interest features are being managed in a way which maintains their nature conservation value, they are assessed as being in a 'favourable condition'. An AEoI is likely to be one which prevents the site from making the same contribution to favourable conservation status for the relevant feature as it did at the time of its designation. There are no set thresholds at which impacts on site integrity are considered adverse. This is a matter for interpretation on a site-by-site basis, depending on the designated feature and nature, scale, and significance of the impact.

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[2] https://www.gov.uk/guidance/nationally-significant-infrastructure-projects-advice-on-habitats-regulations-assessments

[3] European Commission (2019), Directorate-General for Environment, Managing Natura 2000 sites – The provisions of Article 6 of the 'Habitats' Directive 92/43/EEC, Publications Office, 2019: https://data.europa.eu/doi/10.2779/02245

[4] Defra, NE, the Welsh Government and Natural Resources Wales (2021) 'Habitats Regulations Assessment: protecting a European site': https://www.gov.uk/guidance/habitats-regulations-assessments-protecting-a-european-site

[5] https://www.gov.uk/guidance/appropriate-assessment

NE, NRW, and the JNCC have issued generic conservation objectives, which should be applied to each interest feature of the site. Supplementary advice on conservation objectives ("SACOs") for each site underpins these generic objectives to provide site-specific information and give greater clarity to what might constitute an adverse effect on a site interest feature. SACOs are subject to availability and are currently being updated on a rolling basis.

Where supplementary advice is not yet available for a site, NE[6] advises that HRAs should use the generic objectives and apply them to the site-specific situation. For SPAs, the overarching objective is to avoid the deterioration of the habitats of qualifying features, and the significant disturbance of the qualifying features, ensuring the integrity of the site is maintained and the site makes a full contribution to achieving the aims of the Habitats Regulations. This is achieved by, subject to natural change, maintaining and restoring:

- the extent and distribution of the habitats of the qualifying features;
- the structure and function of the habitats of the qualifying features;
- the supporting processes on which the habitats of the qualifying features rely;
- the populations of the qualifying features; and
- the distribution of the qualifying features within the site.

For SACs, the overarching objective is to avoid the deterioration of the qualifying natural habitats and the habitats of qualifying species, and the significant disturbance of those qualifying species, ensuring the integrity of the site is maintained and the site makes a full contribution to achieving favourable conservation status of each of the qualifying features. This is achieved by, subject to natural change, maintaining and restoring:

- the extent and distribution of the qualifying natural habitats and habitats of qualifying species;
- the structure and function (including typical species) of qualifying natural habitats;
- the structure and function of the habitats of qualifying species;
- the supporting processes on which qualifying natural habitats and habitats of qualifying species rely;
- the populations of qualifying species; and
- the distribution of qualifying species within the site.

[6] http://publications.naturalengland.org.uk/publication/6734992977690624?cache=1656417868.31

The Applicant's revised HRA Stage 1 Screening Report [REP2-012] ('the HRA Screening Report') summarised site-specific information for all designated sites screened in by the Applicant along with their conservation objectives.

The conservation objectives and, where available, SACOs have been used by the Secretary of State to consider whether the Project has the potential to have an AEoI of sites, either alone or in-combination with other plans or projects.

1.4 The Report on the Implications for European Sites and statutory consultation

Under Regulation 63(3) of the Habitats Regulations and Regulation 28(4) of the Offshore Habitats Regulations the competent authority must, for the purposes of an AA, consult the Statutory Nature Conservation Body ("SNCB") and have regard to any representation made by that body within such reasonable time as the authority specifies.

Natural Resources Wales ("NRW") is the SNCB for Wales and for Welsh waters within the 12 nm limit. The Joint Nature Conservation Committee ("JNCC") is the SNCB beyond the 12 nm limit.

The ExA produced a Report on the Implications for European Sites ("RIES") [PD-019] (English) / [PD-019a] (Welsh). The purpose of the RIES was to compile, document and signpost information submitted during the Examination by the Applicant and Interested Parties ("IPs"), up until Deadline 4 of the Examination (4 November 2024). It was issued to ensure that IPs, including NRW (Advisory) ("NRW (A)") and the JNCC as the Appropriate Nature Conservation Bodies are consulted formally on Habitats Regulations matters.

The RIES was published on the PINS NSIP web pages and the ExA notified IPs that it had been published. Consultation on the RIES was undertaken between 19 November 2024 and 3 December 2024 (D5). The Applicant [REP5-083], NRW (A) [REP5-099], and the JNCC [REP5-095] provided comments on the RIES.

At the point of the RIES's publication, several HRA matters remained outstanding. Many of the Examination submissions submitted at D5 and D6 contained information relevant to the HRA, and both the JNCC [REP4-103] and NRW(A) [REP5-00] noted that the RIES did not take account of this updated information. Both SNCB's advised that the RIES be updated to include this new information, however the ExA did not do so, noting the advice in PINS Advice

Page 10[7]. However, the ExA [ER C.1.29] did note that the Secretary of State may wish to undertake further consultation to fulfil the duties under Regulation 63(3) of the Habitats Regulations and Regulation 28(4) of the Offshore Habitats Regulations. The Secretary of State did so in a consultation letter dated 12 May 2025[8]. Both SNCB's responded to this stating that they had nothing further to add to their previous advice given during the Examination.
Following the Secretary of State's targeted consultation letter, he sent a letter to all IP's asking for final comments on the information provided[9]. On 12 June 2025 the JNCC responded to this letter[10] with further comments on the matter of UXO clearance and the way the matter was to be secured. A discussion of this matter is included later within this HRA.

1.5 Documents referred to in this HRA

This HRA has taken account of, and should be read in conjunction with, the documents produced as part of the Application and Examination, which are available on the PINS NSIP website[11]. In particular, but not limited to:

- The ExA's Report;
- The RIES [PD-019];

- HRA Stage 2 Information to Support an Appropriate Assessment ("ISAA") Part 1 – Introduction and Background [APP-031], revised in [REP7-016];
- HRA Stage 2 ISAA Part 2 – Special Areas of Conservation (SACs) assessments [APP-032] ('the HRA Stage 2 SAC Report'), revised in [REP7-017];

[7] https://www.gov.uk/guidance/nationally-significant-infrastructure-projects-advice-on-habitats-regulations-assessments

[8] https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010137/EN010137-002234-Mona%20Offshore%20Wind%20Farm%20-%20Information%20Request%20-%2012%20May%202025_.pdf

[9] https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010137/EN010137-002258-Mona%20Offshore%20Wind%20Farm%20-%20All-IP%20Consultation%20-%2029%20May%202025.pdf

[10] https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010137/EN010137-002280-Joint%20Nature%20Conservation%20Committee%20-%2012%20June%202025.pdf

[11] https://infrastructure.planninginspectorate.gov.uk/projects/wales/mona-offshore-wind-farm/?ipcsection=docs

- HRA Stage 2 ISAA Part 3 – Special Protection Areas (SPAs) assessments [APP-033] ('the HRA Stage 2 SPA Report'), revised in [REP2-010] and [REP7-018];
- HRA Stage 1 Screening Report [APP-034], ('the HRA Screening Report'); revised in [REP2-012] and [REP7-023]; and
- HRA Integrity Matrices [APP-035], revised in [REP2-014].

The Secretary of State has also taken into account the responses to his consultation letters, issued on:

- 12 May 2025;
- 29 May 2025;
- 30 May; and
- 5 June 2025.

The HRA Report was supported and informed by several Environmental Statement appendices which are referred to therein (i.e. [APP-086 to APP-096]).

In addition to the HRA Report, the RIES refers to representations submitted to the Examination by IPs, Statements of Common Ground ("SoCG") and other Examination documents as relevant.

Subsequent references to the SoCG's between the Applicant, NRW(A) and the JNCC in the Secretary of State's HRA (this document) are to the final versions, unless otherwise stated. The SoCG's confirmed that all material matters relating to HRA were agreed between the parties.

2 Project Description

2.1 Project Description and Location

A detailed description of the Project is presented in Chapter 3 of the ES [REP7-027].

The Project comprises the following offshore components:

- Up to 96 offshore wind turbine generators and associated foundations.

- Up to 325km of Inter-array cables connecting the wind turbine generators to up to four offshore substations platforms.
- Up to 360km of offshore export cables connecting to the onshore substation and up to 50km of interconnector cables connecting the offshore substations.
- Up to four buried offshore export cables to connect the landfall area.

The Project also comprises the following onshore components:

- A landfall site at Llanddulas, North Wales, connecting offshore and onshore cables.
- Up to four buried circuits, each cable circuit will consist of three cables, giving a total of up to 12 cables laid in trefoil formation or flat.
- Up to four onshore Transition Joint Bays with a maximum depth of 4m and maximum area of each bay being 300m^2.
- A new onshore substation south of the existing National Grid Bodelwyddan National Grid substation and onshore cables connecting both substations.

The proposed Mona wind farm array area is approximately 300km^2, located 28.8 km from the north coast of Wales, 46.9km from the northwest coast of England and 46.6km from the Isle of Man. A maximum of 96 Wind Turbine Generators are proposed, with a maximum rotor blade diameter of 320m.

Electricity generated from the Mona array area to the UK National Grid would be transmitted using a High Voltage Alternating Current with a voltage up to 275kV. The offshore export cables would make landfall at Llanddulas, North Wales, and from there connect to the onshore export cable at the onshore transition joint bays, located approximately 155m above MHWS within the Landfall construction compound. Further buried onshore export cables would then travel to the existing Bodelwyddan National Grid substation.

The onshore components lie within the administrative areas of Denbighshire County Council and Conwy County Borough Council.

A map of the Projects offshore and onshore works can be seen below in Figures 1 and 2:

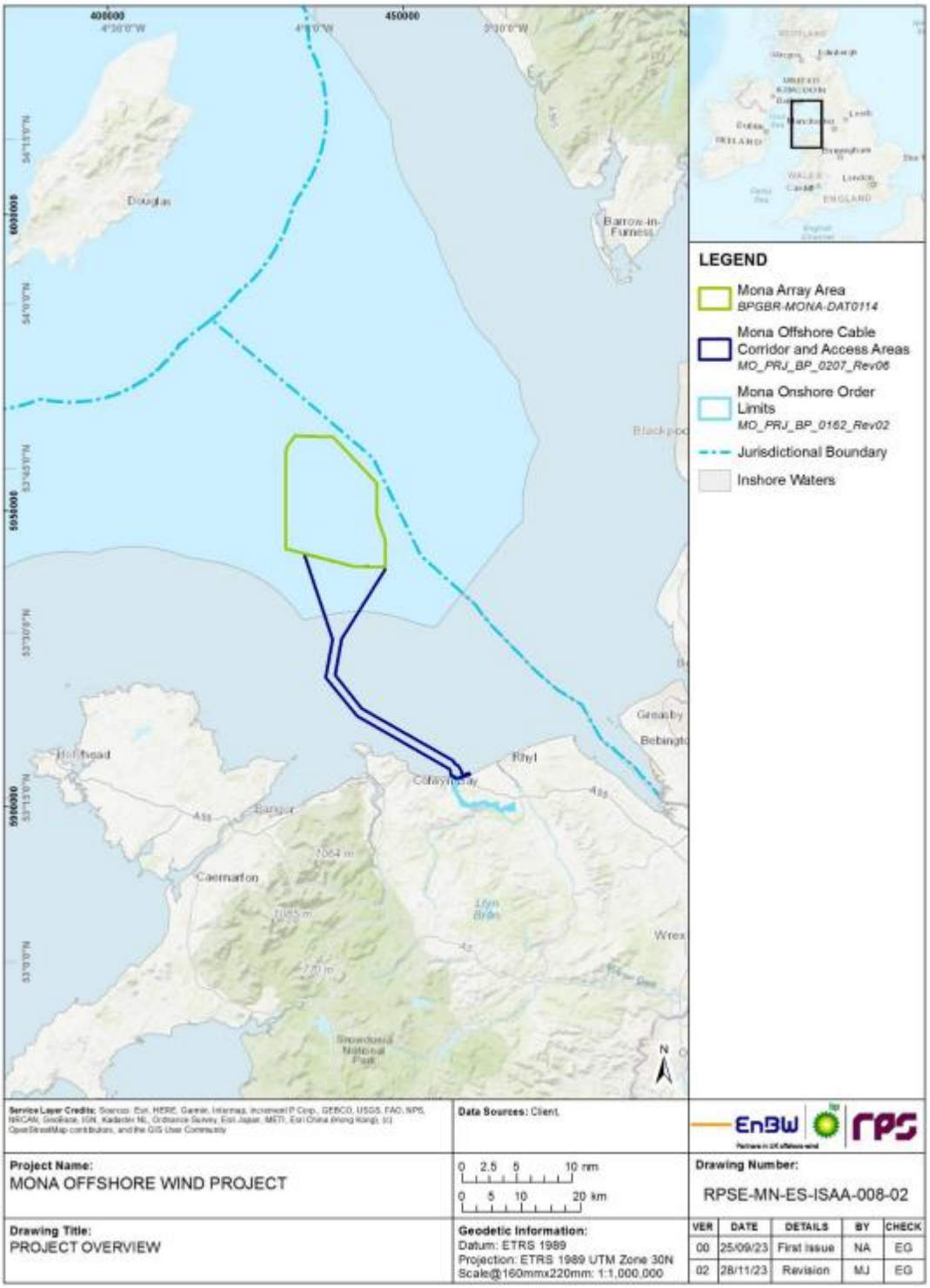

Figure 1: Location of the Mona Offshore Wind Project offshore works

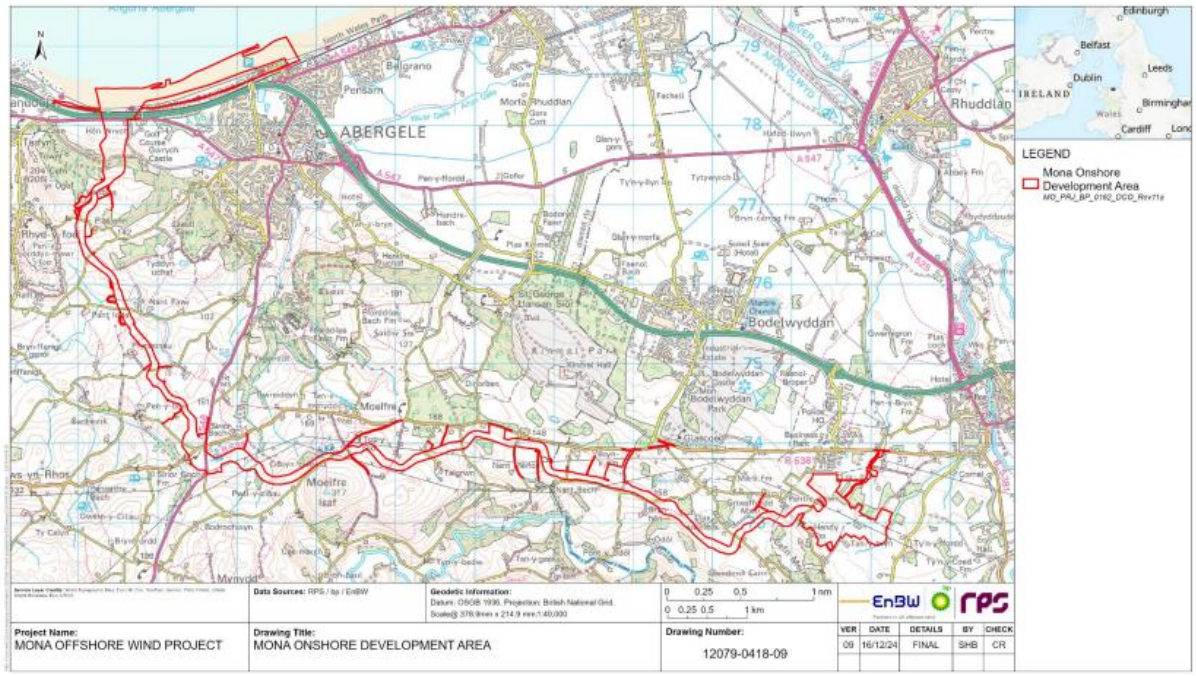

Figure 2: Location of the Mona Offshore Wind Project Onshore Development Area

The final design for the Project may not be confirmed until after the consent has been granted. Consequently, the Applicant has presented a Rochdale envelope approach whereby the maximum development scenarios are presented and assessed. The Rochdale envelope and the presented Maximum Design Scenarios provide sufficient flexibility in the finalisation of the design whilst ensuring that the environmental effects if the Project eventually constructed have been properly assessed. The realistic worse-case maximum design is assessed and outlined by the Applicant in its "Stage 2 Information to Support an Appropriate Assessment" documents [REP7-016] to [REP7-022]. The Secretary of State's HRA is based upon the realistic worst-case design scenario of the Project, in accordance with PINS Advice Note 9.[12]

2.2 Changes to the Application during Examination

During the Examination, the Applicant submitted one change request with several proposed changes as reported in Chapter 1 of the ExA's Recommendation Report. These changes were accepted by the ExA on 19 December 2024 [PD-020]. The ExA concluded that no relevant HRA matters arose from these change request.

[12] https://www.gov.uk/government/publications/nationally-significant-infrastructure-projects-advice-note-nine-rochdale-envelope

The Applicant also submitted several revisions to the application documents, details of which can be found in the Guide to the Application document submitted at Deadline 7 [AS-034]. This provides a guide to documents submitted as part of the Application and was updated at each Deadline when new or revised documents were submitted. It provides a record of all documentation submitted into the Examination by the Applicant.

3. Stage 1: Screening for Likely Significant Effects

3.1 Likely Significant Effects Alone and In-Combination

Under Regulation 63 of the Habitats Regulations and Regulation 28 of the Offshore Habitats Regulations, the Secretary of State must consider whether a development will have a likely significant effect ("LSE") on a protected site, either alone or in-combination with other plans or projects.

The purpose of this section is to identify any LSEs on protected sites that may result from the Project and to record the Secretary of State's conclusions on the need for an AA.

Section 1.3 of the HRA Screening Report [APP-034], revised in [REP2-012] and [REP7-023] identified 77 protected sites within the UK's NSN which were to be included in the LSE assessment. During Examination, no other protected sites were identified by IPs for inclusion in the assessment.

A table detailing these sites screened into the assessment and their associated conservation objectives can be found in Appendix B of this report.

The spatial relationship between the Order Limits of the Project and protected sites considered in the Applicant's assessment of LSE is shown in Figures 3 to 7 of this HRA.

The following impacts were considered by the Applicant to have the potential to result in LSEs on protected sites during construction, operation, and decommissioning of the Project:

Table 1: Table showing a list of potential impact pathways considered by the Applicant, sorted by their relevant receptor group

Receptor Group	Likely Significant Effect Pathway
Annex I habitats (offshore)	• Temporary habitat loss/disturbance • Increases in Suspended Sediment Concentration ("SSC") and associated deposition • Release of sediment bound contaminants • Long-term subtidal habitat loss • Introduction of artificial structures • Changes in physical processes • Electromagnetic fields ("EMF") • Heat from subsea electrical cables • Increased risk of introduction and spread of invasive non-native species • Removal of hard substrates • Accidental pollution
Annex II diadromous fish species	• Temporary habitat loss/disturbance • Increases in SSC and associated deposition • Underwater sound impacting fish and shellfish receptors • Long-term subtidal habitat loss • Introduction of artificial structures and colonisations of hard structures • EMF • Disturbance/remobilisation of sediment bound contaminants • Accidental pollution
Annex II marine mammals	• Injury and disturbance from underwater sound from piling, UXO detonation and site investigation surveys • Injury and disturbance from underwater sound due to vessel use and other activities • Increased risk of injury due to collision with vessels • Changes in prey availability • Changes in water clarity • Operational sound • EMF • Accidental pollution • Increased SSC and associated sediment deposition.
Offshore ornithological features	• Temporary and permanent habitat loss/disturbance and increased SSC

	• Disturbance and displacement from airborne sound, and presence of vessels and infrastructure • Collision risk • Barrier to movement • Changes in prey availability • Accidental pollution
Onshore ornithological features	• Temporary habitat loss/disturbance and change in prey availability • Permanent habitat loss/displacement • Disturbance and displacement from presence of vehicles/heavy machinery • Collision risk

No additional impact pathways were identified for inclusion in the assessment during the Examination.

3.2 Sites for which the Secretary of State concludes no LSE

In agreement with the ExA, NRW(A), and the JNCC, the Secretary of State concludes that LSE can be excluded, both alone and in-combination with other plans or projects, on the qualifying features of the following protected sites, and are therefore screened out of subsequent stages of this HRA.

<u>Annex II marine mammals:</u>

- Treshnish Isles SAC;
- Monach Islands SAC;
- North Rona SAC;

<u>Offshore ornithological features:</u>

- Auskerry SPA;
- Fair Isle SPA;
- Fetlar SPA;
- Foula SPA;
- Forth Islands SPA;
- Farne Islands SPA;
- Hermaness, Saxa Vord and Valla Field SPA;

- Hoy SPA;
- Morecambe Bay and Duddon Estuary SPA;
- Mousa SPA;
- Noss SPA;
- Priest Island (Summer Isles) SPA;
- Ronas Hill – North Roe and Tingon SPA;
- Treshnish Isles SPA;

Onshore and offshore ornithological features:

- Burry Inlet SPA;
- Burry Inlet Ramsar;
- Dee Estuary SPA;
- Dee Estuary Ramsar;
- Dyfi Estuary/Aber Dyfi SPA;
- Severn Estuary SPA;
- Severn Estuary Ramsar; and
- Traeth Lafan/Lavan Sands, Conway Bay SPA.

This list includes all protected sites within the onshore ornithological receptor group.

3.3 Sites for which the Secretary of State concludes LSE on some or all qualifying features

During the Examination, discussions were held regarding the conclusions of LSE on protected sites, particularly on the topic of offshore ornithology.

During early stages of the Examination, both NRW(A) and the JNCC raised concerns surrounding the methodology in the Applicant's HRA Screening Report [REP2-012]. Concerns were raised surrounding displacement assessments, mortality rates, collision risk assessments, apportionment, and the in-combination assessment. A full overview of the methodological concerns raised, can be found in Appendix C, Sub-Appendix 3 of the ExA's Report.

Furthermore, the ExA recommended that contrary to the Applicant's assessment, the Atlantic Puffin qualifying feature of the Skomer, Skokholm and the Seas off Pembrokeshire/ Sgomer, Sgogwm a Moroedd Penfro SPA, the Sule Skerry and Sule Stack SPA, St Kilda SPA, and the

Shiant Isles SPA should be brought forward to the AA due to impacts from displacement, as they considered the Applicant to have used displacement and mortality rates that fall short of SNCB advice in their modelling. The Secretary of State agrees with this approach, and he has screened this qualifying feature into his AA.

The potential for alone and in-combination LSE from the Project has been identified for the following sites:

- Aberdaron Coast and Bardsey Island SPA/ Glannau Aberdaron ac Ynys Enlli SPA
- Afon Gwyrfai a Llyn Cwellyn SAC
- Ailsa Craig SPA
- Bowland Fells SPA
- Buchan Ness to Collieston SPA
- Canna and Sanday SPA
- Cape Wrath SPA
- Cardigan Bay/ Bae Ceredigion SAC
- Copeland Islands SPA
- Dee Estuary SAC/ Aber Dyfrdwy SAC River Dee and Bala Lake/ Afon Dyfrdwy a Llyn Tegid
- East Caithness Cliffs SPA
- Flamborough and Filey Coast SPA
- Flannan Isles SPA
- Fowlsheugh SPA
- Grassholm SPA
- Handa SPA
- Irish Seafront SPA
- Isles of Scilly Complex SAC
- Isles of Scilly SPA
- Liverpool Bay SPA
- Lundy SAC
- Menai Strait and Conwy Bay/ Y Fenai a Bae Conwy SAC
- Mingulay and Berneray SPA
- Morecambe Bay and Duddon Estuary SPA
- Murlough SAC
- North Anglesey Marine/Gogledd Môn Forol SAC
- North Caithness Cliffs SPA

- North Channel SAC
- North Colonsay and Western Cliffs SPA
- North Rona and Sula Sgeir SPA
- Pembrokeshire Marine/Sir Benfro Forol SAC
- Pen Llŷn a`r Sarnau/ Lleyn Peninsula and the Sarnau SAC
- Rathlin Island SPA
- Ribble and Alt Estuaries Ramsar
- Ribble and Alt Estuaries SPA
- River Bladnoch SAC
- River Derwent and Bassenthwaite Lake SAC
- River Eden SAC
- River Ehen SAC
- River Kent SAC
- Rum SPA
- Shiant Isles SPA
- Skomer, Skokholm and the seas off Pembrokeshire/ Sgomer, Sgogwm a Moroedd Penfro SPA
- Solway Firth SAC
- St Kilda SPA
- Strangford Lough SAC
- Sule Skerry and Sule Stack SPA
- The Maidens SAC
- Troup, Pennan and Lions Heads SPA
- West Wales Marine/ Gorllewin Cymru Forol SAC
- West Westray SPA

3.4 Likely Significant Effects Conclusion

The Secretary of State has carefully considered the potential effects of the Project on all qualifying features of the protected sites raised during the Examination, taking into account their conservation objectives, to determine whether there will be LSEs in the context of the Habitats Regulations. The Secretary of State considers that sufficient information has been provided to inform an assessment in line with his duties under the Habitats Regulations.

The final SoCGs with the JNCC [REP7-097] and NRW (A) [REP7-094] confirmed that they considered that the correct protected sites and impact pathways had been identified in the

HRA Screening Report [REP7-023]. No matters were raised by any IPs in the Examination in relation to the Applicant's screening for LSE [ER 4.2.18].

The ExA also considered that the correct protected sites and impact pathways had been identified in the Applicant's HRA Report. Following the addition of Shiant Isles SPA, Skomer, Skokholm and the seas off Pembrokeshire/ Sgomer, Sgogwm a Moroedd Penfro SPA, St Kilda SPA, and Sule Skerry and Sule Stack SPA for impacts on the Atlantic Puffin, the ExA was satisfied with the approach to the assessment of alone and in-combination LSE [ER C.2.46]. The ExA agreed that the Project is likely to have a significant effect on the qualifying features of the protected sites identified by the Applicant when considered alone, or in-combination with other plans or projects [ER 4.2.20]. This was not disputed by IPs or SNCB's during the Examination [ER 4.2.20]. Table B of the ExA's Report presents the protected sites for which the ExA considers that significant effects cannot be excluded.

Based on the information before him, the views of IPs and SNCBs, as well as the recommendations of the ExA, the Secretary of State concludes that LSE from the Project, alone and in-combination with other plans or projects, could occur during construction, operation, and decommissioning of the Project. The list on page 21 of this document presents the protected sites for which the Secretary of State considers that significant effects cannot be excluded, either alone or in-combination. The LSEs are therefore taken forward to the AA to consider whether the Project would result in an AEoI of the identified protected sites.

3 Appropriate Assessment Methodology

The requirement to undertake an AA is triggered when a competent authority, in this case the Secretary of State, determines that a plan or project is likely to have a significant effect on a protected site either alone or in-combination with other plans or projects. Guidance issued by Defra states that the purpose of an AA is to assess the implications of the plan or project in respect of the site's conservation objectives, either individually or in-combination with other plans and projects, and that the conclusions should enable the competent authority to ascertain whether the plan or project will adversely affect the integrity of the site concerned. The focus is therefore specifically on the species and / or habitats for which the protected site is designated.[1]

In line with the requirements of Regulation 63 of the Habitats Regulations and Regulation 28 of the Offshore Habitats Regulations:

In considering whether a plan or project will adversely affect the integrity of the site, the competent authority must have regard to the manner in which it is proposed to be carried out or to any conditions or restrictions subject to which it proposes that the consent, permission or other authorisation should be given.

The purpose of this AA is to determine whether adverse effects on the integrity of the features of the protected sites identified, as a result of the Project alone or in-combination with other plans or projects, can be ruled out in view of the site's conservation objectives and using the best scientific evidence available.

In accordance with the precautionary principle embedded in the integrity test and established through case law[2], the Secretary of State as the competent authority may agree to the plan or project only after having ascertained that it will not adversely affect the integrity of the protected site, and this must be demonstrated beyond all reasonable scientific doubt. If the Secretary of State cannot exclude an AEoI of the affected protected sites, then he can only agree to a plan or project if it complies with the requirements of Regulation 64 of the Habitats Regulations. Regulation 64 provides that the Secretary of State may agree to the plan or project only if satisfied that there are no alternative solutions, and that the plan or project must be carried out for imperative reasons of overriding public interest ("IROPI"). In addition, Regulation 68 requires compensatory measures to be secured which maintain the overall coherence of the NSN.

4 Stage 2: Appropriate Assessment

The Secretary of State has undertaken an objective scientific assessment of the implications of the Project on the qualifying features of the protected sites identified in the screening assessment, using the best scientific evidence available. The assessment considers the site's conservation objectives.

The Applicant's HRA Report concluded that the Project would not adversely affect the integrity of any of the protected sites and features for which a LSE pathway was identified, either alone or in-combination with other projects or plans.

4.1 Sites where a conclusion of no AEoI was not disputed during Examination

The Applicant's conclusion of no AEoI was not disputed at the close of the Examination in respect of the following protected sites:

Annex I Habitats (offshore):

- **Menai Strait and Conwy Bay/ Y Fenai a Bae Conwy SAC** - Impact Pathways: Increases in Suspended Sediment Concentration ("SSC") and associated deposition, increased risk of introduction and spread of Invasive Non-Native Species ("INNS"), changes in physical processes, removal of hard substrate – Annex I reef only, accidental pollution, and in-combination effects

Annex II Diadromous Fish:

- **Afon Gwyrfai a Llyn Cwellyn SAC –** Impact Pathways: Underwater sound impacting fish and shellfish receptors, Electro Magnetic Fields ("EMF"), and in-combination effects
- **Dee Estuary SAC/ Aber Dyfrdwy SAC –** Impact Pathways: Underwater sound impacting fish and shellfish receptors, EMF, and in-combination effects
- **River Dee and Bala Lake/ Afon Dyfrdwy a Llyn Tegid SAC** – Impact Pathways: Underwater sound impacting fish and shellfish receptors, EMF, and in-combination effects
- **River Derwent and Bassenthwaite Lake SAC** - Impact Pathways: Underwater sound impacting fish and shellfish receptors, EMF, and in-combination effects
- **River Ehen SAC** – Impact Pathways: Underwater sound impacting fish and shellfish receptors, EMF, and in-combination effects
- **River Eden SAC** – Impact Pathways: Underwater sound impacting fish and shellfish receptors, EMF, and in-combination effects
- **River Kent SAC** – Impact Pathways: Underwater sound impacting fish and shellfish receptors, EMF, and in-combination effects
- **River Bladnoch SAC** – Impact Pathways: Underwater sound impacting fish and shellfish receptors, EMF, and in-combination effects
- **Solway Firth SAC** – Impact Pathways: Underwater sound impacting fish and shellfish receptors, EMF, and in-combination effects

Annex II Marine Mammals:

- **Cardigan Bay/ Bae Ceredigion SAC** – Impact Pathways: Underwater sound from piling, underwater sound from clearance of Unexploded Ordnance ("UXO"), underwater sound from site investigation surveys, underwater sound due to vessel use and other activities, and in-combination effects
- **Pembrokeshire Marine/Sir Benfro Forol SAC** – Impact Pathways: Underwater sound from piling, underwater sound from clearance of UXO, underwater sound from site investigation surveys, underwater sound due to vessel use and other activities, and in-combination effects
- **Pen Llŷn a`r Sarnau/ Lleyn Peninsula and the Sarnau SAC** – Impact Pathways: Underwater sound from piling, underwater sound from clearance of UXO, underwater sound from site investigation surveys, underwater sound due to vessel use and other activities, and in-combination effects
- **West Wales Marine/ Gorllewin Cymru Forol SAC** – Impact Pathways: Underwater sound from piling, underwater sound from clearance of UXO, underwater sound from site investigation surveys, underwater sound due to vessel use and other activities, and in-combination effects
- **Bristol Channel Approaches/ Dynesfeydd Môr Hafren SAC** – Impact Pathways: Underwater sound from piling, underwater sound from clearance of UXO, underwater sound from site investigation surveys, underwater sound due to vessel use and other activities, changes in prey availability, and in-combination effects
- **Isles of Scilly Complex SAC** – Impact Pathways: Underwater sound from piling, underwater sound from clearance of UXO, underwater sound from site investigation surveys, underwater sound due to vessel use and other activities, and in-combination effects
- **Lundy SAC** – Impact Pathways: Underwater sound from piling, underwater sound from clearance of UXO, underwater sound from site investigation surveys, underwater sound due to vessel use and other activities, and in-combination effects
- **Murlough SAC** – Impact Pathways: Underwater sound from piling, underwater sound from clearance of UXO, underwater sound from site investigation surveys, underwater sound due to vessel use and other activities, and in-combination effects
- **North Channel SAC** – Impact Pathways: Underwater sound from piling, underwater sound from clearance of UXO, underwater sound from site investigation surveys, underwater sound due to vessel use and other activities, and in-combination effects

- **Strangford Lough SAC** – Impact Pathways: Underwater sound from piling, underwater sound from clearance of UXO, underwater sound from site investigation surveys, underwater sound due to vessel use and other activities, and in-combination effects
- **The Maidens SAC** – Impact Pathways: Underwater sound from piling, underwater sound from clearance of UXO, underwater sound from site investigation surveys, underwater sound due to vessel use and other activities, and in-combination effects

The ExA was satisfied that on the basis of the information provided in the Applicant's HRA Report and during the Examination, that an AEoI on all the above sites and their qualifying features can be excluded [ER C.4.6].

Based on the information before him, and subject to the mitigation measures as secured in the final Order, the Secretary of State is satisfied that the Project, either alone or in-combination with other plans or projects, will not adversely affect the integrity of the qualifying features of the protected sites listed above.

4.2 Sites for which the conclusion of no AEoI was disputed during Examination

However, the Applicant also excluded AEoI alone or in-combination for the following sites and respective qualifying features:

- North Anglesey Marine/Gogledd Môn Forol SAC – Harbour porpoise
- Liverpool Bay/Bae Lerpwl SPA – Non-breeding red throated diver and common scoter
- Grassholm SPA – Northern gannet
- Skomer, Skokholm and the Seas off Pembrokeshire/ Sgomer, Sgogwm a Moroedd Penfro SPA; Sule Skerry and Sule Stack SPA; St Kilda SPA; Shiant Isles SPA - Atlantic Puffin

Several of the Applicant's conclusions of no AEoI in relation to these protected sites and their qualifying features were disputed by IPs and were discussed throughout the Examination.

Additionally, there was concern over the impact of Highly Pathogenic Avian Influenza ("HPAI") on bird species at all sites, and disagreements relating to the Applicant's in-combination assessment.

The Secretary of State's conclusions in relation to these protected sites and impact pathways are discussed below.

North Anglesey Marine/Gogledd Môn Forol SAC - UXO Clearance – Harbour Porpoise

The Applicant [APP-032] assessed that there was a need to clear up to 22 unexploded ordnances ("UXOs") within the red line boundary of the Project. The Applicant's assessment considered a worst-case scenario involving the high-order detonation of 907kg, with 130kg the most likely (common) maximum.

This worst-case scenario predicted a maximum disturbance range of 28.3km and an Effective Deterrent Range of 26km, based on guidance from the JNCC.

The North Anglesey Marine/Gogledd Môn Forol SAC, designated for harbour porpoise, lies 22.5km from the Array Area and 17.5km from the Mona Offshore Cable Corridor. Consequently, the assessment concluded that the 26km EDR from UXO clearance could overlap with 66.06km² of the SAC. This overlap can be seen in Figure 8 of this HRA's appendix.

However, the Applicant's HRA Report [APP-032] states the maximum daily disturbance would affect only 2.03% of the SAC—significantly below the JNCC's 20% daily threshold. Over a 22-day clearance period, the average seasonal disturbance would be just 0.24%, which is also below the 10% seasonal threshold.

NRW [REP1-056] and the JNCC [REP3-086] expressed concerns about high-order UXO clearance, due to significant underwater noise, shockwaves and seabed disturbance which can have potential negative environmental impact on marine mammals. As an alternative to high-order UXO clearance, they recommended prioritizing low order deflagration, which causes the UXO to burn out but not detonate and is considered a less disruptive / damaging technique. NRW(A) also did not support the Applicant's proposed use of soft start charges for UXO clearance due to the substantial additional impulsive noise they introduce into the marine environment[3], and their scaring effect being unproven[4] [5] [6].

During Examination, both SNCBs stated that they would support the inclusion of a requirement within the DCO/DML which restricted all UXO clearance to low noise methods, with the JNCC preferring to exclude all UXO clearance from DML.

Initially, the Applicant defended the inclusion of both high and low-order methods in the dDCO and DML, citing the need for flexibility and to avoid project delays. However, by D5, the Applicant agreed to commit solely to low-order UXO clearance. This commitment was reflected in Schedule 14 of the dDCO [AS-036], where low-order UXO clearance is clearly defined as a method that does not seek to detonate UXO. The Applicant [REP5-080] confirmed that any future need for high-order UXO clearance would require a separate Marine Licence application.

Other protected sites with marine mammal qualifying features are located more than 80km from the Project and fall outside the maximum disturbance range. As a result, they were not considered further in the examination process.

Further to securing low-order deflagration UXO clearance, the Applicant will use the Underwater Sound Mitigation Strategy ("UWSMS") and Marine Mammal Mitigation Protocol ("MMMP") to reduce potential impacts on marine mammals. After initial concerns from the JNCC and NRW, the Applicant updated both the outline UWSMS and the outline MMMP, which are secured by the DCO. Final versions of the UWSMS and any required MMMP will be developed in consultation with the SNCBs, as secured through the dML and the NRW Marine Licence.

NRW (A) [REP5-099] later confirmed that the updated outline UWSMS and outline MMMP are fit for purpose and provide confidence that an AEoI on the harbour porpoise qualifying feature can be ruled out. The JNCC [REP6-135] also expressed satisfaction with the noise abatement measures within the updated outline UWSMS and outline MMMP and agreed that final versions would be completed after consent is granted. In their response to the Secretary of State's consultation letter that was sent to all IPs, the JNCC gave further comments on the outline UWSMS and outline MMMP, requesting the Applicant makes further details to the plans such as removing references to low yield methods which currently have no efficacy data, and changing evidence referenced so that its conclusions are not misleading. The Secretary of State is content that these requests can be incorporated into the final versions of these plans, post-consent.

With the removal of high-order UXO clearance from the design of the Project and the securing of the UWSMS and MMMP in the DML, both NRW [REP7-094][REP7-146] and the JNCC [REP6-135] agreed that adverse effects, from the Project alone and in-combination with other plans or projects, on offshore SACs with marine mammal qualifying features can be ruled out.

On this matter, the ExA noted the Applicant's commitment to low-order UXO clearance, and the amendments made to the outline MMMP and outline USWMS, and concluded that subject to the proposed mitigation measures, the Project alone or in-combination with other plans or projects would not undermine the conservation objectives of the North Anglesey Marine/ Gogledd Môn Forol SAC [ER C.4.20].

In an information request dated 12 May 2025, the Secretary of State asked NRW and JNCC for confirmation that they had no further comments to make in relation to HRA matters. In responses dated 22 May and 21 May respectively, both NRW(A) and the JNCC confirmed that they had nothing further to add beyond what was contained in their final SoCGs with the Applicant. However, in response to this letter, the Applicant provided an update surrounding

the progress of the consideration of UXO clearance by NRW as part of the standalone NRW marine licence. Specifically in this correspondence the Applicant had noted advice that the JNCC had provided during the marine licence application, which stated that a maximum number of clearances must be included in any marine licence awarded. In response to this advice, the Applicant agreed to include wording in the DML that would restrict the number of clearances to a maximum of 22.

In response to the Applicants update, the JNCC responded on 12 June 2025 that new updates in policy, in particular the new unexploded ordnance clearance Joint Position Statement, meant that their original position of not including any mention of UXO clearance in the DCO/DML was strengthened further than it had been during examination. In this consultation response the JNCC argue that there is currently a lack of information as to specific details about the UXO clearance, and that the surveys that would inform these details are yet to have been conducted.

However, the JNCC also stated that whilst not their preferred method, if the Secretary of State was minded to secure the clearance within the DML, that there were methods of making this more agreeable to them. This included welcoming the Applicants willingness to accept a condition limiting the number of clearances, alongside edits to the outline UWSMS and outline MMMP.

The Secretary of State is supportive of these requests for edits and notes that these can be resolved by the Applicant, NRW and the JNCC through the approval of the final plans post-consent. He considers their current forms contain sufficient detail so that he can assess the potential worst-case impacts of the Project.

On the matter of securing UXO clearance, the Secretary of State has chosen to include UXO clearance as part of the DML, in agreement with NRW. However, he understands the JNCC's concerns and has added the requirement to ensure the number of UXO clearances carried out will not exceed those which were assessed in the ES.

Following the addition of the restriction on the maximum number of UXO clearances to the DML, the Secretary of State is confident that an AEoI from UXO clearance as a result of the Project, both alone and in-combination with other plans or projects, on the harbour porpoise qualifying feature of the North Anglesey Marine/Gogledd Môn Forol SAC can be excluded.

Liverpool Bay/Bae Lerpwl SPA – Disturbance and displacement - -Non-breeding red throated diver and common scoter

The Applicant's Offshore Ornithology section of their ES [REP4-007] sets out how the increase in vessel movements associated with the construction, operation and maintenance of the Project could lead to an increase in vessel/bird interaction within the Liverpool Bay/Bae Lerpwl SPA, which overlaps with the Offshore Cable Corridor and Access Areas. Two of the species for which the site is designated for are red throated diver, and the common scoter.

The Applicant's HRA Report [REP2-010] sets out that using the maximum design scenario, in the winter months up to 30.67 red-throated diver and 1240 common scoter may be temporarily displaced due to airborne sound and the presence of vessels and infrastructure during construction.

Consequently, the Applicant produced the 'Measures to Minimise Disturbance to Marine Mammals and Rafting Birds from Transiting Vessels' document [REF5-030], which set out industry best practices for minimising disturbance.

In response to the concerns raised by NRW(A) and the JNCC, at D5 the Applicant also included a commitment to a seasonal restriction on offshore export cable laying and UXO clearance within the SPA between 1 November to 31 March to reduce disturbance to sensitive features including common scoter and red-throated diver during the overwintering period. The matter of UXO clearance is discussed below. As no cable installation would occur during these months, the Applicant considered that there would be no cable installation vessel movements, and therefore the two overwintering species would not be disturbed. Further to this, the JNCC [RR-033] also requested that the buffer for the restricted area was increased to include a 2.5km extension from the boundary of the SPA. The Applicant [PDA-008] argued that this would not lessen the impact of magnitude on the qualifying species due to the fact that few birds occupied the areas at the edge of the SPA, to which the JNCC agreed and concluded there would still be no AEoI without any additional buffer distance. At D5 NRW(A) [REP5-099] also concluded that there would not be an AEoI, and that the cable restriction was adequately secured.

Vessel movements at the landfall

Whilst the Applicant had included a restriction on cable installation from 1 November - 31 March, NRW(A) [RR-011] noted that the restriction would not apply to trenchless works in the intertidal zone. The Applicant argued in their 'response to relevant representation' [PDA-008]

that the export cable laying restriction had already limited the Project's programme of works, and prohibiting works at the trenchless techniques exit pits during the overwintering period would add further pressure to the installation window for offshore export cables.

The Applicant confirmed in the sixth offshore ornithology expert wording group meeting [APP-042] that up to 8 vessel movements were required over the overwintering period within the intertidal zone.

NRW(A) and the RSPB Cymru noted that this intertidal zone was an area where overwintering common scoter could be found.

The Applicant argued that as the number of movements was small, and there are other habitats available, the activity was not considered to increase the impact on the common scoter or red throated diver to a level that would threaten the integrity of the site.

NRW(A) [REP1-056] consequently agreed with the Applicant that this temporary activity will not result in an AEoI for the wintering waterbirds in the SPA. The JNCC [REP4-099] initially disagreed, advising that the 1 November – 31 March restriction needed to apply to the works in the intertidal zone as well, however at the close of the Examination in their final SoCG [REP7-097] they agreed with NRW(A) and the Applicant that the seasonal restriction did not need to include the trenchless works in the intertidal zone.

Construction port selection and vessel transit routes.

At the close of examination, no decision had been made regarding which port(s) will be used for the Project's construction, and therefore it was unknown where vessels will be transiting to and from. Instead, the Applicant produced the outline Vessel Traffic Management Plan, which used indicative vessel routes and includes consideration of the potential final port(s). The plan is to be developed post-consent in consultation with relevant stakeholders, and finalised once the Applicant has awarded the port contract.

According to this plan, the vessels will use regular vessel transit routes following (where appropriate) established shipping routes, which will restrict and minimise the spatial distribution of any disturbance to rafting birds such as the common scoter and red throated diver. The Applicant has assessed the potential disturbance of the birds using a precautionary predicted maximum density of birds within a 2km buffer of the cable corridor and access area. The Applicant has assessed that using these maximum figures, an AEoI could still be excluded.

The JNCC [REP4-099] stated that as the vessel routes were only indicative, the robustness of the assessments on the qualifying species were reduced. The Applicant [REP5-073] responded that using indicative vessel routes is standard practice, and the level of detail included in their assessment was in line with previous offshore wind applications and was sufficient to conclude no AEoI on the Liverpool Bay/Bae Lerpwl SPA.

The Secretary of State agrees with the Applicant that they have provided as robust a management plan that can be produced before the confirmation of which port(s) will be used, and that the Applicant's assessment covers a reasonable worst-case scenario on this matter.

He concludes that the Applicant's outline Vessel Traffic Management Plan is adequate, and the assessment has included sufficient detail to conclude no AEoI. He takes comfort that final vessel movements will be agreed with key stakeholders' post-consent when discharging the final Vessel Traffic Management Plan, and the impacts from these routes will be no more adverse than has been assessed in the ES.

Pre-Commencement Activities including UXO Surveys and Clearance

The JNCC [REP4-099] and NRW(A) [REP4-105] raised concerns that pre-commencement activities, such as UXO surveys and clearance, were not fully addressed in terms of their potential to disturb rafting birds, as the Offshore Environmental Management Plan ("OEMP") only applies to construction and operational phases. They advised that an AEoI could not be ruled out due to vessel movements during these early activities.

Both the JNCC [REP5-095] and NRW(A) [REP5-099] highlighted the cumulative impact of vessel traffic, including those for UXO clearance and cable guarding, and recommended seasonal restrictions for UXO clearance (1 November – 31 March) to protect sensitive species within the SPA. The Applicant [REP4-062] initially stated that seasonal restrictions would only apply to cable installation, asserting that impacts on red-throated diver and common scoter from the pre-commencement activities would be negligible (<0.01% increase in baseline mortality) [APP-033] and [REP7-018].

However, at D5 the Applicant updated their 'Measures to Minimise Disturbance to Marine Mammals and Rafting Birds from Transiting Vessels' document [REP5-030], which committed to avoiding UXO clearance within the SPA during the sensitive period and also anticipated this would be further secured through the standalone NRW Marine Licence for Transmission Assets. Despite this, the Applicant maintained that other pre-commencement activities, such as non-intrusive surveys and intermittent vessel movements, did not warrant seasonal restrictions due to their limited scope and duration. Flexibility was also requested for year-

round operation of guard vessels to ensure the protection of exposed cables and the safety of sea users.

At the end of examination, both the JNCC ([REP7-097] and [REP7-144]) and NRW(A) ([REP6-137] and [REP7-094]) concluded that following the Applicant's addition of restricting UXO clearance from 1 November to 31 March, an AEoI for the site could be excluded.

Conclusion

Overall, the ExA concluded that it was satisfied that the Applicant's proposed mitigation measures are adequately detailed and secured. On this specific matter the ExA concluded it was satisfied that the target to 'minimise' disturbance caused by human activity to the red-throated diver feature of the Liverpool Bay SPA would be achieved through the mitigation measures proposed by the Applicant.

On this matter, the Secretary of State has considered the Applicants mitigation measures, including the restriction on cable installation and UXO clearance from 1 November – 31 March, and he concludes that it is sufficient to allow him to have confidence that an AEoI from disturbance or displacement as a result of the Project, both alone and in-combination with other plans or projects, on the common scoter and red throated diver qualifying features of the Liverpool Bay/Bae Lerpwl SPA can be excluded.

Grassholm SPA – Collision Risk - Northern Gannet

The Applicant's HRA Stage 2 SPA Report [APP-033] concluded that an AEoI from collision risk as a result of the Project, both alone and in-combination, on the northern gannet qualifying feature of the Grassholm SPA can be ruled out. NRW (A) agreed with this initial conclusion [REP4-015]. However, later in the Examination, the Applicant carried out further assessments in relation to collision risk to northern gannet [REP5-074]. Both the JNCC [REP6-135] and NRW(A) [REP6-137] commented that several areas of these updated assessments could be over-precautionary and therefore could lead to a conclusion that does not accurately reflect the potential adverse effects from the Project.

The updated assessment [REP5-074] included new modelling for all species (except for Manx Shearwater) using the most up-to-date population counts from 2024. Whilst it is typically best practice to use the most recent figures when carrying out modelling, the SNCBs argued that it is more important that the data is contemporaneous, so that like-for-like impacts can be clearly assessed. The JNCC [REP6-235] noted that this is particularly crucial if there is a large change in the population when compared to the baseline surveys that have been carried out (which occurred between March 2020 and February 2022). The JNCC noted that this is the case at

the Grassholm SPA, which was particularly affected by the HPAI outbreak in 2022 and 2023. The Northern gannet's nesting population at the site reduced 52% from 2022 to 2023 [7].

NRW(A) [REP6-127] also argued that using the data collected pre-HPAI and comparing that to post-HPAI data was not appropriate and would likely overestimate the relative effects. The JNCC also requested that the Applicant use the 2015 colony count and consider the impacts of HPAI separately within a wider narrative around predicted impacts.

NRW(A) [REP6-127] and the JNCC [REP6-235] also noted other elements of the modelling which could be improved to avoid misleading conclusions. They commented that the Applicant's assessment failed to account for the macro-avoidance of gannet, as well as the fact that gannets typically have a high habitat flexibility and a large foraging range. These behavioural traits mean that it is unlikely that the displacement rate for the species would be at the upper end of any scale, as had been used in the Applicant's assessment. Both SNCBs also commented that tracking data (e.g. from Votier *et al.,* 2010) and utilisation distributions (e.g. Wakefield *et al*., 2013) suggest that gannets display spatial segregation between colonies, and therefore it is likely that the breeding season apportionment values used by the Applicant were overly precautionary.

At D5, both the JNCC and NRW(A) could not rule out an AEoI off the Grassholm SPA from collision risk to northern gannet. Consequently, the SNCB's suggested that the Applicant revise the modelling using pre-HPAI data instead, and take account of their other advice on the methodologies used.

The Applicant subsequently submitted a 'Revised Assessment for Northern Gannet at Grassholm SPA' [REP6-088], which incorporated the advice from both SNCBs, and concluded no AEoI for the northern gannet at the Grassholm SPA.

In their overarching AA conclusion, the ExA is satisfied that the Applicant's proposed mitigation measures are adequately detailed [ER C.4.72], and it is cognisant of the unfavourable condition of the northern gannet at the Grassholm SPA. They conclude that the Project would not result in further deterioration of this qualifying feature or undermine the conservation objectives of the protected site [ER C 4.70].

While the SoCGs between the Applicant and the JNCC [REP7-097] and NRW(A) [REP7-094] showed all HRA matters as agreed, this revised modelling was submitted by the Applicant late in the Examination, and not all parties had a chance to comment. Consequently, in the

consultation letter dated 12 May 2025[13] the Secretary of State wrote to NRW(A) and the JNCC to confirm that they were content with the Applicant's revised in-combination assessment for northern gannet, regarding the Grassholm SPA.

On the 21 May 2025, the JNCC wrote that they believed this to be a matter that NRW(A) are fully responsible for and therefore they had no comments to make. On the 22 May 2025, NRW(A) commented that "Whilst there were some precautionary elements in the assessment (as detailed in Section 1.1.1.3 of REP7-146), [NRW(A)] were able to reach a conclusion that an Adverse Effect on Site Integrity (AEoSI) could be ruled out for in-combination collision, displacement and collision plus displacement impacts to the features of this SPA (see paragraph 9 of REP7-146).".

The Secretary of State considers that the Applicant's revised assessment has taken into account the concerns from both the JNCC and NRW, and that it is no longer overly precautionary. As such, the Secretary of State is confident that an AEoI from collision risk as a result of the Project, both alone and in-combination with other plans or projects, on the northern gannet qualifying feature of the Grassholm SPA can be excluded.

Highly Pathogenic Avian Influenza – Ornithological Features – All sites

As described above, NRW believed that the impact of HPAI could be dealt with through a narrative of wider impacts. The Applicant [PD-008] argued that HPAI had been considered throughout the ES chapters as, whilst baseline ornithological surveys were conducted before the outbreak, any population declines would proportionally reduce the predicted impact. This approach followed NE guidance, which was agreed upon with the JNCC, NRW(A), and NE.

According to NE, impacts would scale with colony size—for example, a 10% population reduction would lead to 10% fewer collisions.

However, RSPB Cymru disagreed with this proportional approach, maintaining that HPAI could cause additional effects such as reduced foraging ability, lower productivity, and changes in bird movement patterns, potentially altering interactions with wind farms. This disagreement was marked as "Not agreed – material" in their final SoCG with the Applicant [REP7-107].

Neither the JNCC nor NRW(A) commented on RSPB Cymru's specific concerns.

[13] https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010137/EN010137-002234-Mona%20Offshore%20Wind%20Farm%20-%20Information%20Request%20-%2012%20May%202025_.pdf

On this matter, the ExA noted RSPB Cymru's concerns, but agreed with the Applicant's position set out in [REP6-089] that it has considered the impact of HPAI as far as possible, and that further action to resolve this concern should be undertaken through industry and stakeholder groups.

In the consultation letter dated 12 May 2025[14], the Secretary of State wrote to RSPB Cymru asking for any further comments on this and other HRA matters. RSPB Cymru did not respond to this information request.

On this matter, the Secretary of State acknowledges RSPB Cymru's concerns about the impact HPAI could have on bird populations, however, overall, he agrees with the SNCBs guidance that impacts would be proportional to the colony size. However, the Secretary of State notes that this does not preclude him from taking a different approach in future decisions should further evidence be published.

Furthermore he notes that as discussed above, whilst the JNCC and NRW(A) requested the Applicant use pre-HPAI data for modelling of collision impact on the northern gannet qualifying feature of Grassholm SPA, both SNCB's [REP6-135][REP6-137] considered the difference between recent (post-HPAI) and contemporaneous (pre-HPA) data did not change the outcomes for the impacts on other populations such as those in the Skomer, Skokholm and the Seas off Pembrokeshire/Sgomer, Sgogwm a Moroedd Penfro SPA.

Considering all the information before him, the Secretary of State believes the Applicant has acknowledged the potential impact HPAI may have on bird populations, and that this has been incorporated into the conclusions of the HRA Report.

Skomer, Skokholm and the seas off Pembrokeshire/ Sgomer, Sgogwm a Moroedd Penfro SPA – in combination displacement razorbill during the breeding season - Razorbill

Both the JNCC [REP5-093] and NRW (A) [REP5-098] noted that the in-combination assessment for displacement of razorbill within the Skomer, Skokholm and the seas off Pembrokeshire/ Sgomer, Sgogwm a Moroedd Penfro SPA in [REP4-030] did not include a consideration of impacts in the breeding season. NRW(A) considered this was incorrect, as

[14] https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010137/EN010137-002234-Mona%20Offshore%20Wind%20Farm%20-%20Information%20Request%20-%2012%20May%202025_.pdf

there were projects within the in-combination assessment which are within the foraging range of this SPA, and therefore they should have impacts apportioned in the breeding season. NRW(A) gave the example of the Erebus offshore floating wind farm as one which should have had its impacts apportioned.

Consequently, at D7 the Applicant provided an Appendix [REP7-020] to the document titled 'Offshore ornithology supporting information in line with SNCB advice' [REP4-030], which assessed the breeding season impacts for razorbill.

On this matter, the ExA noted that while all HRA matters were marked as agreed in NRW(A) [REP7-094] and the JNCC's final SoCG's [REP7-097], and that they did have sight of the updated assessment, they did not have an opportunity to specifically comment on the Applicant's updated assessment. Consequently, in the consultation letter dated 12 May 2025[15] the Secretary of State wrote to NRW(A) and the JNCC to confirm that they had no further comments to make in relation to HRA matters. Both parties confirmed that they had nothing further to add than what was contained in their final SoCGs with the Applicant.

The Secretary of State has considered the Applicant's updated assessment and considers it to now adequately addresses the concerns of the SNCBs. He has taken comfort in the responses from the JNCC and NRW(A) that there are no outstanding material HRA matters. As such, the Secretary of State is confident that an AEoI from displacement as a result of the Project, both alone and in-combination with other plans or projects, on the razorbill qualifying feature of the Skomer, Skokholm and the seas off Pembrokeshire/ Sgomer, Sgogwm a Moroedd Penfro SPA can be excluded.

Skomer, Skokholm and the Seas off Pembrokeshire/ Sgomer, Sgogwm a Moroedd Penfro SPA; Sule Skerry and Sule Stack SPA; St Kilda SPA; Shiant Isles SPA – Displacement – Atlantic Puffin

The Applicant [APP-034] originally screened out an LSE to Atlantic puffin from all protected sites considered in their assessment, however the JNCC [RR-033] and NRW(A) [RR-011] argued that the Applicant had used incorrect data in their modelling. Specifically, that incorrect Mean Seasonal Peak abundance estimates had been used for the Atlantic puffin during the

[15] https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010137/EN010137-002234-Mona%20Offshore%20Wind%20Farm%20-%20Information%20Request%20-%2012%20May%202025_.pdf

non-breeding season. The SNCBs argued this would lead the predicted displacement mortalities to be incorrect.

The Applicant [REP4-030] argued that using the displacement and mortality rates advised by the JNCC[16] would be excessively precautionary and maintained its conclusion of no AEoI. NRW(A) [REP5-099] and the JNCC [REP5-05] both agreed that the Applicant's disregard of SNCB advice was not appropriate and the JNCC also highlighted [REP1-066] that for most species, evidence suggests that there is a range of displacement rates occurring at operational wind farms, including the upper end of the SNCB-advised range, and sometimes beyond. Both SNCB's concluded an LSE for Atlantic puffin at these qualifying sites.

At the LSE stage, the ExA considered the displacement and mortality rates used by the Applicant fell short of those advocated for by the JNCC, without an adequate reasoning as to why they had departed from SNCB advice [ER C.2.23]. As such, the ExA considered that an LSE for Skomer, Skokholm and the Seas off Pembrokeshire/ Sgomer, Sgogwm a Moroedd Penfro SPA, Sule Skerry and Sule Stack SPA, St Kilda SPA, and the Shiant Isles SPA could not be excluded.

However, whilst the ExA determined contrary to the Applicant that LSE could not be excluded for the above sites due to impacts on Atlantic Puffin, the ExA concluded that given the low annual mortalities predicted, AEoIs can be ruled out [ER C.4.57]. The annual mortalities, as calculated by the JNCC [REP5-095], are listed below:

- Skomer, Skokholm and the Seas off Pembrokeshire/ Sgomer, Sgogwm a Moroedd Penfro SPA (0.8 annual mortalities);
- Sule Skerry and Sule Stack SPA (0.1 annual mortalities);
- St Kilda SPA (0.3 annual mortalities); and
- Shiant Isles SPA (0.1 annual mortalities).

No other points from those discussed above were raised on this matter by any IP during the Examination.

[16] Joint SNCB Interim Displacement Advice Note, 2022

In agreement with the ExA [ER C.4.57], the Secretary of State is confident that an AEoI from displacement as a result of the Project, both alone and in-combination with other plans or projects, on the Atlantic puffin qualifying feature of the identified sites can be excluded.

5 Appropriate Assessment Conclusion

As the competent authority under the Habitats Regulations for this Application under the Planning Act 2008, the Secretary of State has undertaken an AA in respect of the conservation objectives of 51 protected sites to determine whether the Project, either alone or in-combination with other plans or projects, will result in an AEoI.

The Secretary of State has carefully considered all the information available to him, including the recommendations of the ExA, the advice of NRW(A) and the JNCC as the SNCB's, the views of all other IPs, and the Applicant's case.

The Secretary of State is satisfied that, given the relative scale and magnitude of the identified effects on the qualifying features of the protected sites and where relevant, the measures secured in the DCO and DML to avoid or reduce potential adverse effects, there would not be any implications for the achievement of site conservation objectives and therefore adverse effects on the integrity of the following protected sites can be excluded:

- Aberdaron Coast and Bardsey Island SPA/ Glannau Aberdaron ac Ynys Enlli SPA
- Afon Gwyrfai a Llyn Cwellyn SAC
- Ailsa Craig SPA
- Bowland Fells SPA
- Buchan Ness to Collieston SPA
- Canna and Sanday SPA
- Cape Wrath SPA
- Cardigan Bay/ Bae Ceredigion SAC
- Copeland Islands SPA
- Dee Estuary SAC/ Aber Dyfrdwy SAC River Dee and Bala Lake/ Afon Dyfrdwy a Llyn Tegid
- East Caithness Cliffs SPA
- Flamborough and Filey Coast SPA
- Flannan Isles SPA
- Fowlsheugh SPA
- Grassholm SPA

- Handa SPA
- Irish Seafront SPA
- Isles of Scilly Complex SAC
- Isles of Scilly SPA
- Liverpool Bay SPA
- Lundy SAC
- Menai Strait and Conwy Bay/ Y Fenai a Bae Conwy SAC
- Mingulay and Berneray SPA
- Morecambe Bay and Duddon Estuary SPA
- Murlough SAC
- North Anglesey Marine/Gogledd Môn Forol SAC
- North Caithness Cliffs SPA
- North Channel SAC
- North Colonsay and Western Cliffs SPA
- North Rona and Sula Sgeir SPA
- Pembrokeshire Marine/Sir Benfro Forol SAC
- Pen Llŷn a`r Sarnau/ Lleyn Peninsula and the Sarnau SAC
- Rathlin Island SPA
- Ribble and Alt Estuaries Ramsar
- Ribble and Alt Estuaries SPA
- River Bladnoch SAC
- River Derwent and Bassenthwaite Lake SAC
- River Eden SAC
- River Ehen SAC
- River Kent SAC
- Rum SPA
- Shiant Isles SPA
- Skomer, Skokholm and the seas off Pembrokeshire/ Sgomer, Sgogwm a Moroedd Penfro SPA
- Solway Firth SAC
- St Kilda SPA
- Strangford Lough SAC
- Sule Skerry and Sule Stack SPA
- The Maidens SAC
- Troup, Pennan and Lions Heads SPA

- West Wales Marine/ Gorllewin Cymru Forol SAC
- West Westray SPA

The Secretary of State is satisfied that further tests set out in the Habitats Regulations are therefore not required.

6 Transboundary Assessment

The Secretary of State considers that it is important to consider the potential impacts on protected sites in other European Economic Area ("EEA") states, known as transboundary sites. The ExA also considered the implications for transboundary sites. The conclusions of the ExA's considerations and the Secretary of State's own views on this matter are presented below.

On 7 November 2022, following the Applicant's request for an EIA scoping opinion, PINS undertook a transboundary screening and consultation [OD-024] on behalf of the Secretary of State pursuant to Regulation 32 of The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 and the United Nations Environment Programme Convention on Biological Diversity 1992.

PINS took the view that the Project is likely to have a significant effect on the environment in the Republic of Ireland and Belgium. Both states were notified of the Proposed Development and both confirmed that they wished to participate in the Regulation 32 procedure.

Potential transboundary impacts were considered in the Applicant's HRA Report [APP-034], revised in [REP2-012] and [REP7-023]. In their HRA Report, the Applicant considered protected sites in the Republic of Ireland and France. The Proposed Development was determined to have the potential for LSEs on following sites:

Republic of Ireland:

- Rockabill to Dalkey Island SAC (effects on harbour porpoise)
- Roaringwater Bay and Islands SAC (effects on harbour porpoise)
- Blasket Islands SAC (effects on harbour porpoise)
- Saltee Islands SAC (effects on grey seal)
- Saltee Islands SPA (effects on northern gannet)
- Skelligs SPA (effects on northern gannet)
- Howth Head Coast SPA (effects on black-legged kittiwake)

- Ireland's Eye SPA (effects on black-legged kittiwake)
- Lambay Island SPA (effects on black-legged kittiwake)
- Wicklow Head SPA (effects on black-legged kittiwake)

France:

- Mers Celtiques - Talus du golfe de Gascogne Site of Community importance ("SCI") (effects on harbour porpoise)
- Abers - Côte des légendes SCI (effects on harbour porpoise)
- Ouessant-Molène SCI (effects on harbour porpoise)
- Côte de Granit rose-Sept-Iles SCI (effects on harbour porpoise)
- Anse de Goulven, dunes de Keremma SCI (effects on harbour porpoise)
- Tregor Goëlo SCI (effects on harbour porpoise)
- Côtes de Crozon SCI (effects on harbour porpoise)
- Cap Sizun SCI (effects on harbour porpoise)
- Récifs du talus du golfe de Gascogne SCI (effects on harbour porpoise)
- Anse de Vauville SCI (effects on harbour porpoise)
- Cap d'Erquy-Cap Fréhel SCI (effects on harbour porpoise)
- Baie de Saint-Brieuc - Est SCI (effects on harbour porpoise)
- Banc et récifs de Surtainville SCI (effects on harbour porpoise)
- Baie de Lancieux, Baie de l'Arguenon, Archipel de Saint Malo et Dinard SCI (effects on harbour porpoise)
- Estuaire de la Rance SCI (effects on harbour porpoise)
- Baie du Mont Saint Michel SCI (effects on harbour porpoise)
- Chaussée de Sein SCI (effects on harbour porpoise and grey seal)

For effects on harbour porpoise and grey seal it was determined that impact piling during construction, underwater sound generation from UXO detonation, underwater sound during site investigation surveys, increased vessel use, changes in prey availability, and an increase in accidental pollution may result harm to these marine mammals such as hearing damage/auditory injury or behavioural disturbance/displacement [REP7-023], however for all non-UK sites, the Applicant concluded that an AEoI could be excluded on marine mammal qualifying features. The full reasoning behind this conclusion can be found in the Applicant's document titled 'HRA Stage 2 Information to Support an Appropriate Assessment Part Two: Special Areas of Conservation (SACs) Assessments' [REP7-019].

For effects on black-legged kittiwake and northern gannet, it was determined that disturbance and displacement from airborne sound and the presence of vessels and infrastructure, collision risk, and in-combination effects could cause harm to the species, and an LSE was concluded on four non-UK sites for black-legged kittiwake, and two for northern gannet. However, for all non-UK sites, the Applicant concluded that an AEoI could be excluded for ornithological qualifying features. The full reasoning behind this conclusion can be found in the Applicant's document titled 'HRA Stage 2 Information to Support an Appropriate Assessment Part Three: Special Protection Areas and Ramsar sites' [REP7-018].

The Secretary of State notes that the Applicant considered non-UK protected sites in its Application and concluded that there would be no AEoI from the Project alone and in-combination on any transboundary sites.

These conclusions were not disputed by any IP during the Examination [ER C.1.20]. The French Authorities did not submit any representations on HRA matters during the Examination. Although not specifically commenting on HRA matters, the Irish consultee Meath County Council responded to the Secretary of State's transboundary consultation, requesting that the cumulative effects of offshore renewable energy projects in UK and Irish waters/the Irish Sea are fully assessed, specifcally mentioning the Oriel and North Irish Sea Array Wind Farms. The Secretary of State is satisfied that the Applicant has fully assessed the cumulative impacts of the project in full.

Isle of Man:

Whilst the Isle of Man is not covered by the Habitats Regulations, it is covered under the Ramsar Convention[17]. The Applicants original HRA screening report [APP-034] did not include Ramsar sites located within the Isle of Man.

The Applicant [REP6-090] confirmed that the fully designated Ballaugh Curragh Ramsar site located on the Isle of Man was considered during the pre-screening stage, however the site was screened out due to the lack of possible impact pathway between the Proposed

[17] https://www.gov.im/about-the-government/departments/environment-food-and-agriculture/environment-directorate/ecosystem-policy-team/wildlife-biodiversity-and-protected-sites/international-conventions/#:~:text=Ramsar%20Convention%20on%20Wetlands%20of,at%20Ballaugh%20Curragh%20in%202006.

Development and the sites qualifying features of peatlands, corncrake (*Crex crex*), the asilid fly (*Epitryptus cowin*i) and hen harrier (*Circus cyaneus*).

In [PD-013] the ExA asked the Applicant if it had had given consideration to effects on the following proposed Ramsar ("pRamsar") sites:

- Central Valley Curragh pRamsar;
- Dalby Peatlands pRamsar;
- Gob ny Rona, Maughold Head and Port Cornaa pRamsar;
- Southern Coasts and Calf of Man pRamsar; and
- The Ayres pRamsar.

The Isle of Man Government did not raise any concerns with respect to the five pRamsar sites [RR-018]

Nevertheless, the Applicant noted that paragraph 5.4.5 of the Overarching National Policy Statement for Energy (NPS EN-1)[18] requires pRamsar sites to be included within the HRA, and at D6, the Applicant produced [REP6-090] (revised in [REP7-021]) to allow the Secretary of State to complete an AA on the Isle of Man pRamsars if he thought necessary.

In this, the Applicant highlighted that that they had already fully considered impacts on the Isle of Man Marine Nature Reserves ("MNRs") which were designated in 2018 (under the Wildlife Act 1990), and which provide coverage of most of the coastline of the Isle of Man, including the areas proposed to be covered by the Gob ny Rona, Maughold Head and Port Cornaa pRamsar site, the Southern Coasts and Calf of Man pRamsar site and The Ayres pRamsar site. The Applicant also noted that the proposed features of these pRamsar sites are now designated under the Isle of Man MNRs.

The Applicant then carried out an LSE assessment for the five pRamsars. The Applicant identified LSEs on fish, marine mammals, and offshore ornithological features of the Gob ny Rona, Maughold Head and Port Cornaa pRamsar, Southern Coasts and Calf of Man pRamsar and The Ayres pRamsar. It concluded no AEoI of these sites from the Proposed Development alone or in-combination with other plans and projects

[18] https://www.gov.uk/government/publications/overarching-national-policy-statement-for-energy-en-1

Following the publication of the Isle of Man update to the HRA Report [REP6-090], the Isle of Man Government Territorial Sea Committee confirmed that they agreed with the Applicant's conclusions [REP7-093].

The ExA did not provide a specific conclusion on effects on the Isle of Man Ramsar sites but commented generally that subject to mitigation measures included in the DCO, that AEoI's from the Project alone and in combination with other plans or projects could be excluded [C.5.8].

The Secretary of State's Transboundary Conclusion:

The Secretary of State notes that the Applicant considered non-UK protected sites in its Application, including protected sites in the Republic of Ireland and French, as well as pRamsar sites in the Isle of Man, and concluded that there would be no AEoI from the Project alone and in-combination on any transboundary sites.

These conclusions were not disputed by any IP during the Examination [ER C.1.20], including the Isle of Man Government Territorial Sea Committee [REP7-093]. The ExA did not provide a specific conclusion on HRA transboundary effects, but the ExA commented that overall they were satisfied that duties under Regulation 32 had been satisfied

The Secretary of State has not been presented with any substantive evidence to demonstrate that transboundary impacts would have an AEoI on any protected site in an EEA state, including any protected site in the Isle of Man. As such, the Secretary of State is satisfied that the Project, either alone or in-combination with other plans or projects, would not have an AEoI on any transboundary protected site. The Secretary of State is satisfied that further stages of a transboundary assessment are therefore not required.

7 Conclusion

The Secretary of State has carefully considered all information presented within the Application, during the Examination, and the representations made by NRW(A), the JNCC and all IPs, along with the ExA's Recommendation Report.

The Secretary of State carried out an assessment of 76 sites which were screened into the Applicants HRA Report. He concludes that LSEs cannot be excluded at 53 protected sites, when the Project is considered alone or in-combination with other plans or projects. These

LSEs were taken forward to an AA to consider whether the Project would result in an AEoI of the protected sites.

Having considered the information available to him and having made a full assessment of the potential for an AEoI of each of the protected sites for which the potential for LSE was identified, taking into account the views of the Applicant, NRW(A), the JNCC, all IPs, as well as the ExA, the Secretary of State concludes that an AEoI from the Project can be excluded beyond reasonable scientific doubt, subject to the mitigation measures secured through the final Order and the associated DML.

The Secretary of State also concludes that LSEs cannot be excluded at 27 transboundary sites in the Republic of Ireland and France, but was able to conclude that an AEoI of these sites from the Project can be excluded.

As such, the Secretary of State is satisfied that there is no significant risk to any protected site and their qualifying features as a result of the Project and considers that no further tests set out in the Habitats Regulations are required.

Author: Energy Infrastructure Planning Delivery

Department for Energy Security and Net Zero

Date: July 2025

Appendix A

Maps showing the spatial relation of the Project to the Protected sites brought forward to the Appropriate Assessment:

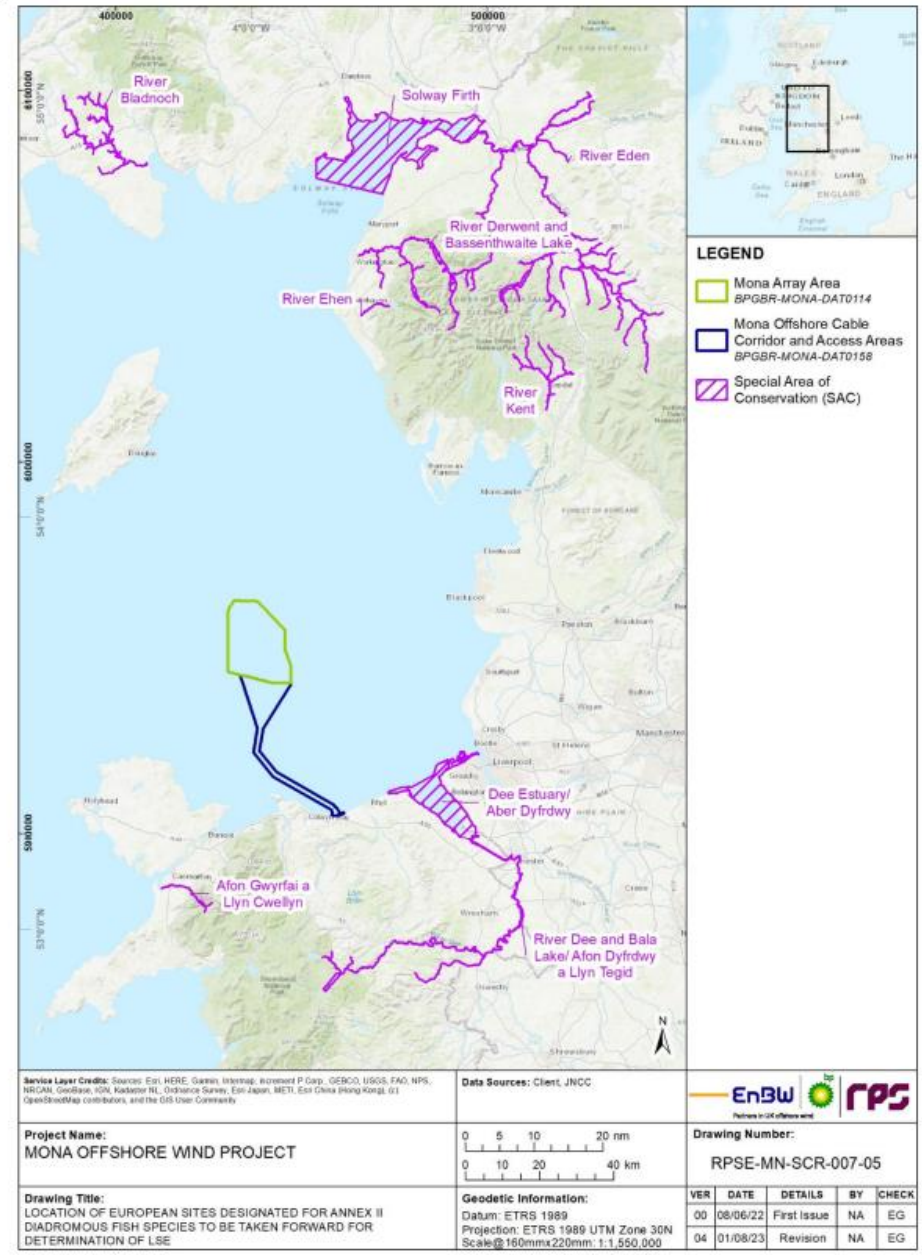

Figure 3: Location of European Sites for Annex II diadromous fish species to be taken forward for determination of LSE.

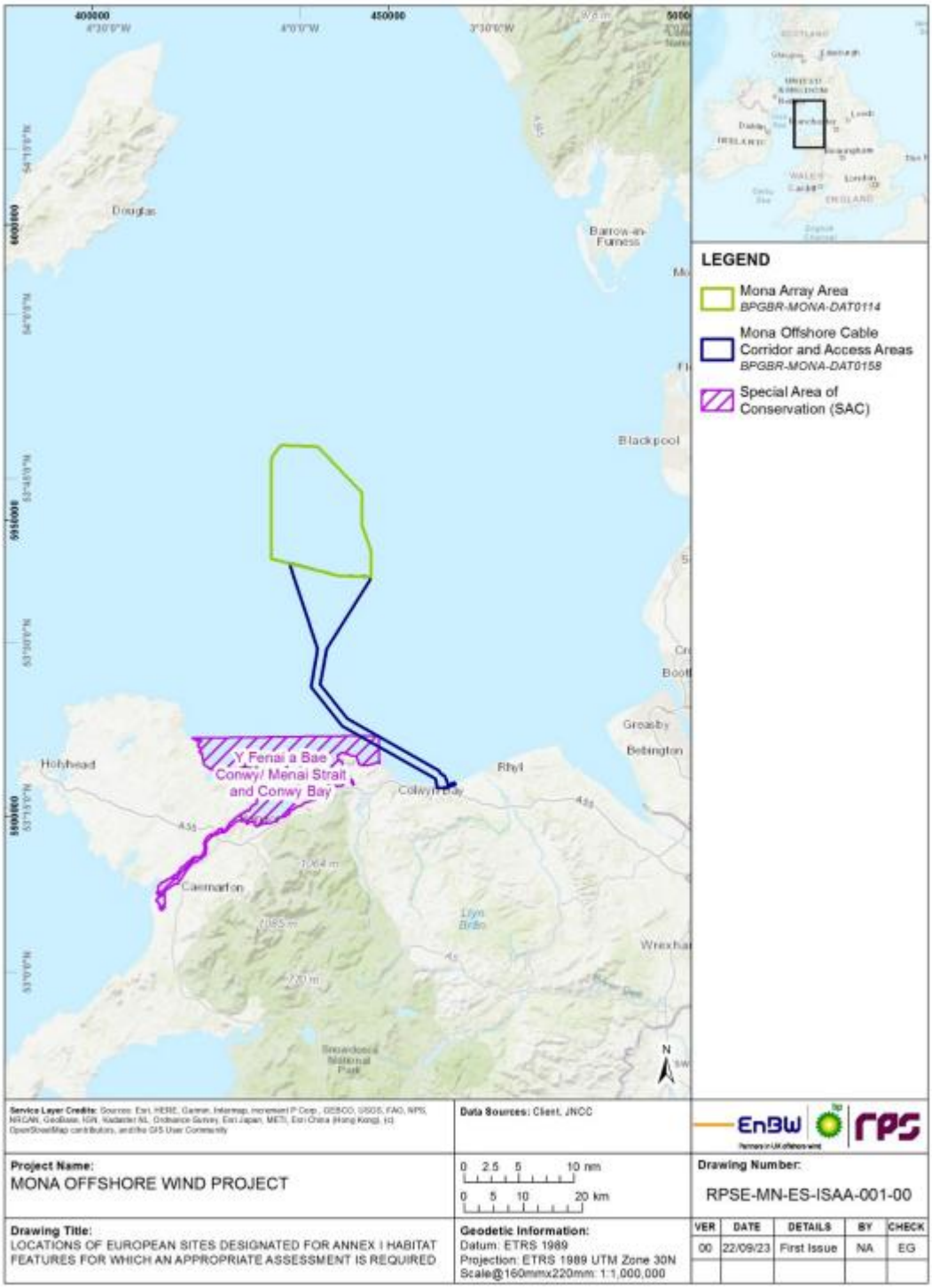

Figure 4: Location of European Sites designated for Annex I habitats taken forward for determination of LSE.

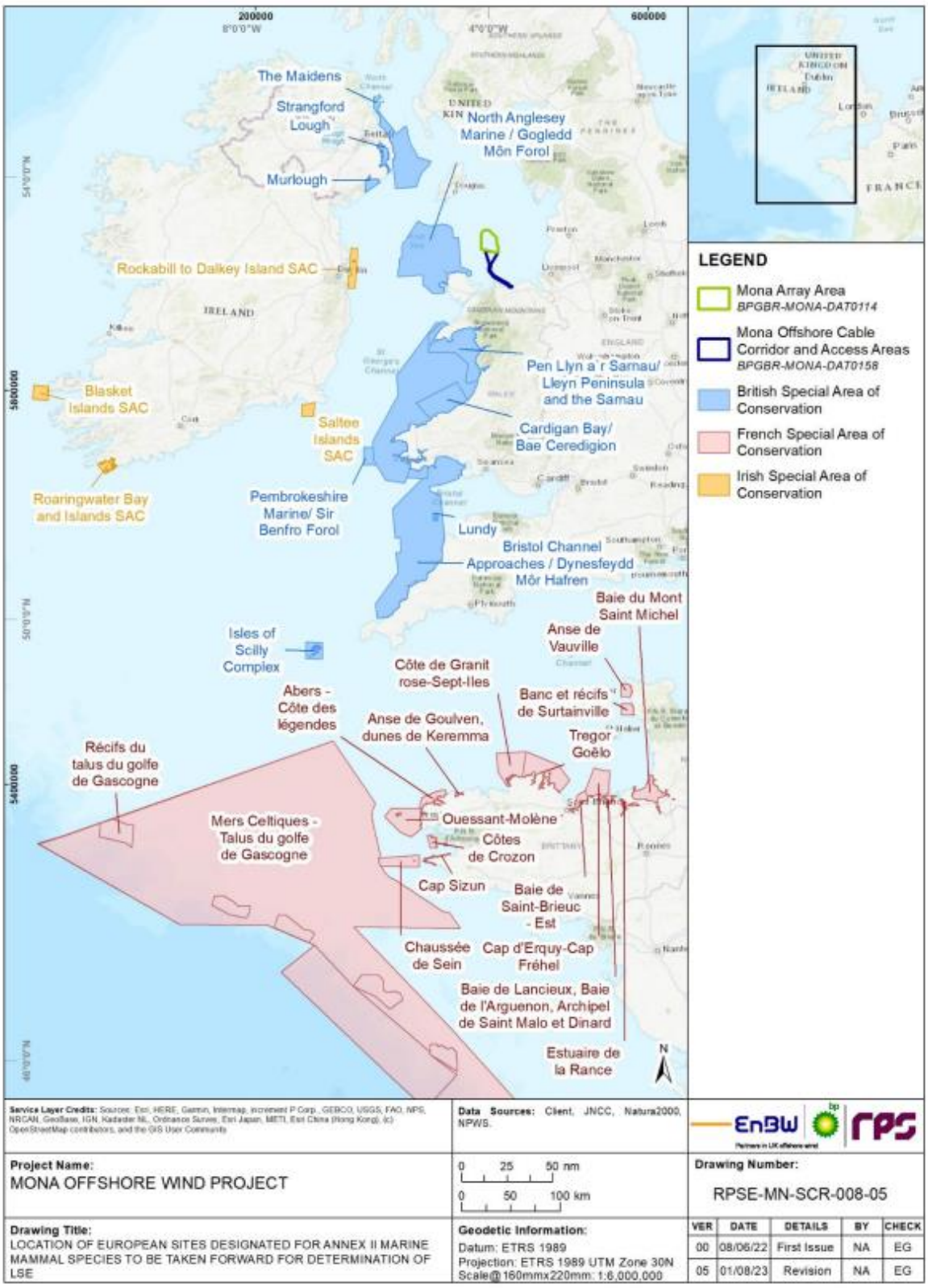

Figure 5: Location of European Sites designated for Annex II marine mammal species to be taken forward for the determination of LSE.

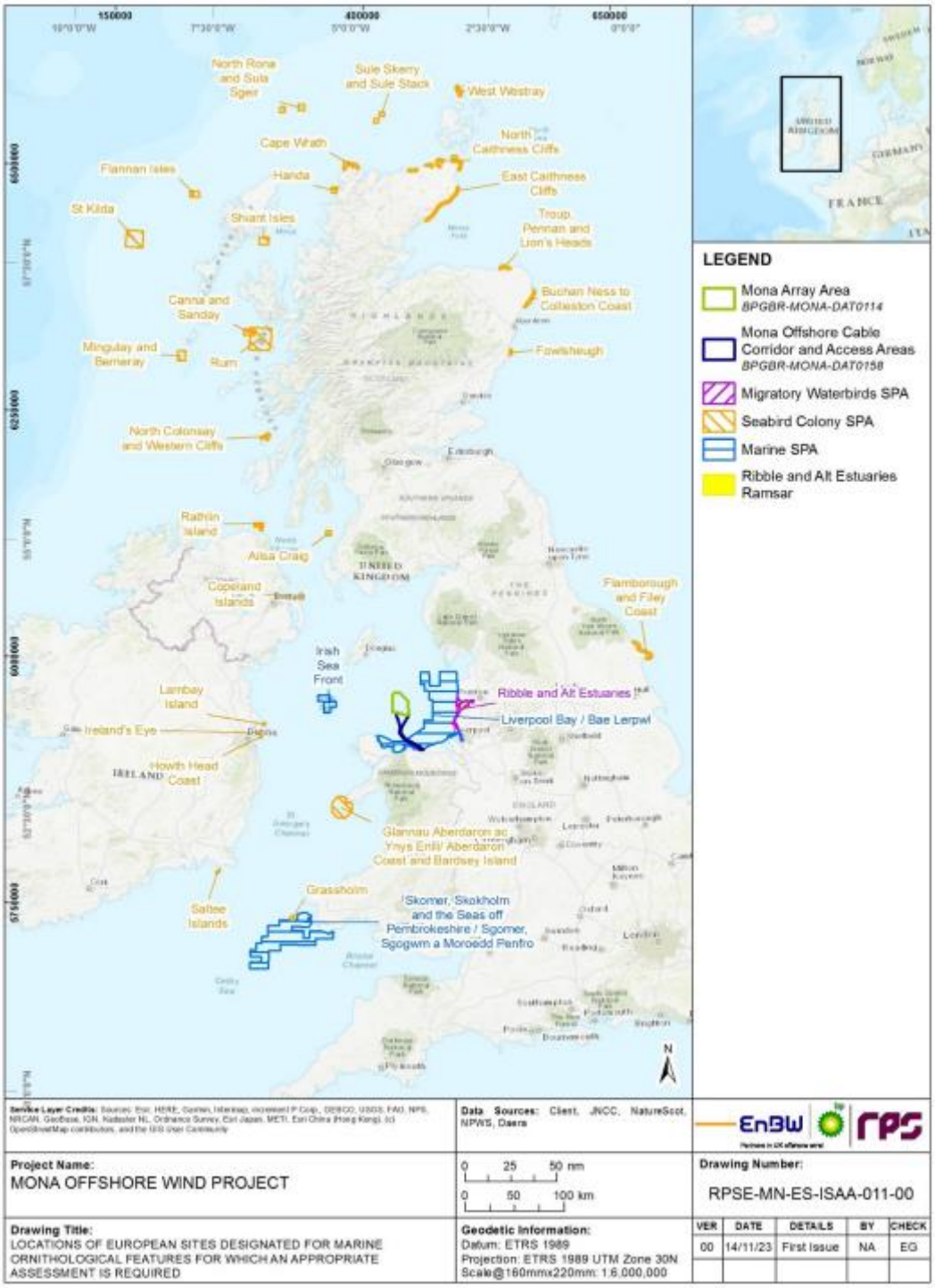

Figure 6: Location of the SPAs and Ramsar sites designated for offshore ornithological features for which an Appropriate Assessment is required.

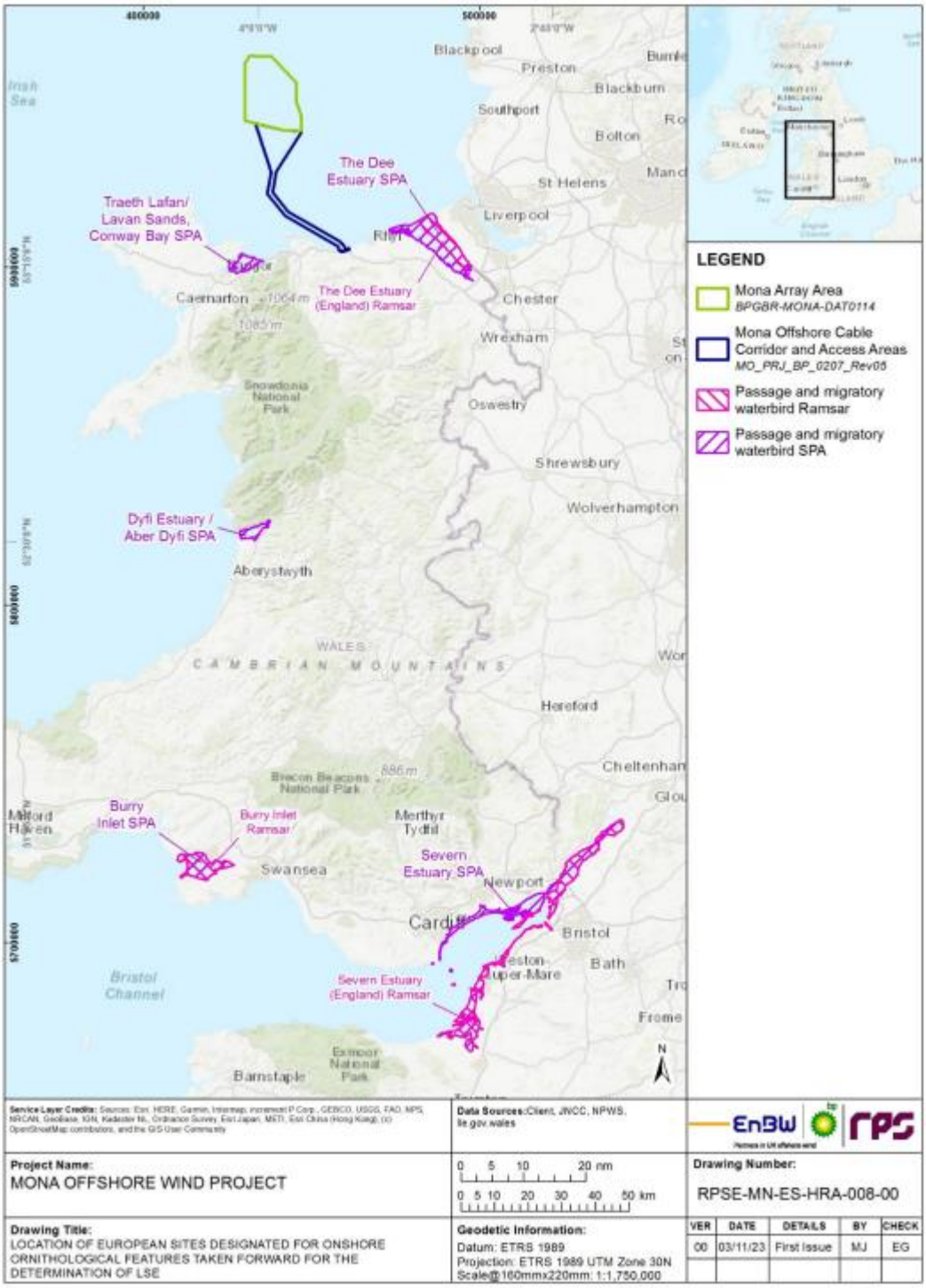

Figure 7: Location of European sites designated for onshore ornithological features to be taken forward for the determination of LSE.

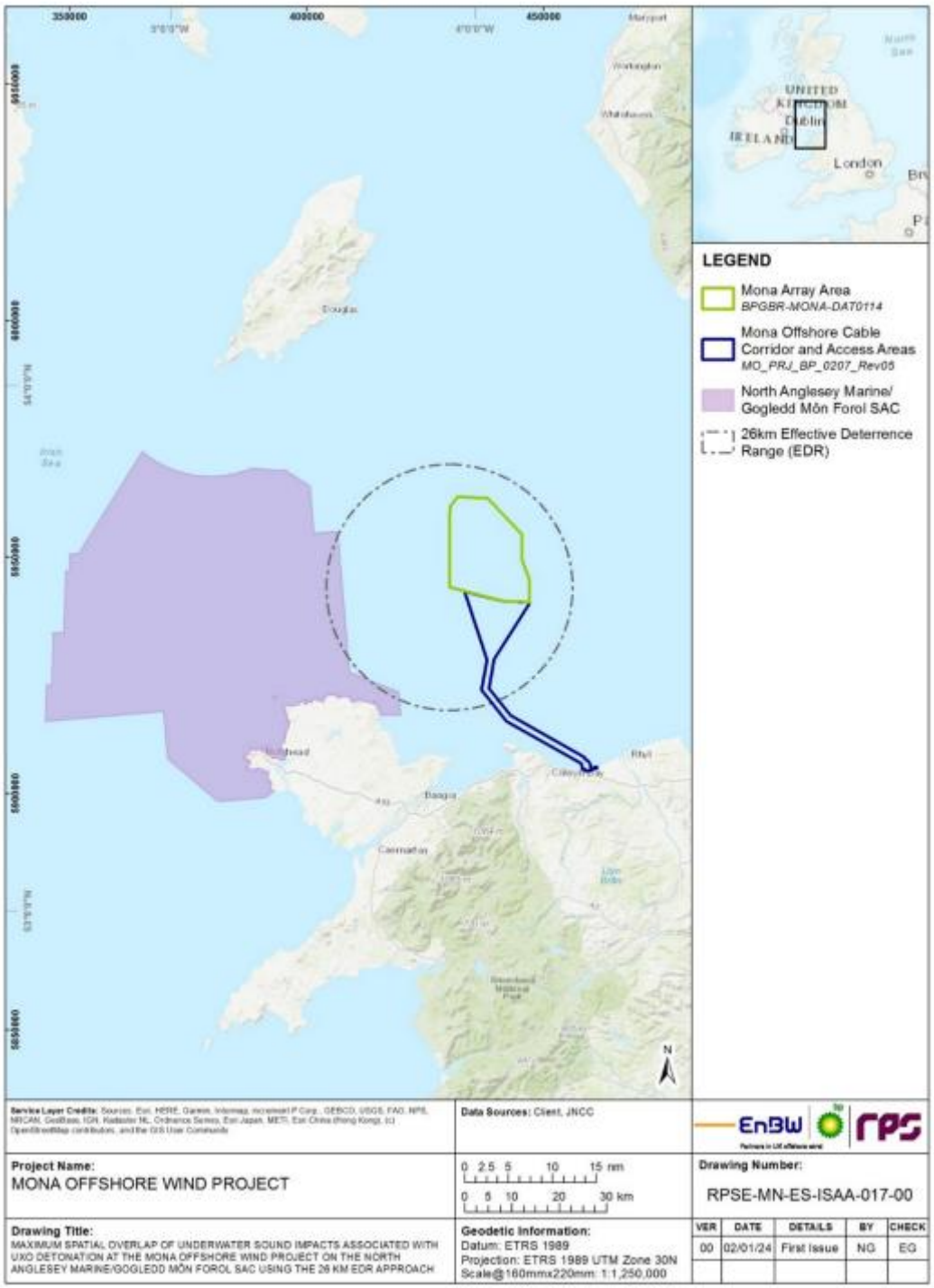

Figure 8: Maximum spatial overlap of the underwater sound impacts associated with UXO detonation at the Mona Offshore Wind Project on the North Anglesey Marine/Gogledd Môn Forol SAC based on the 26 km EDR approach

Appendix B:

Table 2: A table showing the protected sites which were screened into the LSE assessment and their associated conservation objectives.

Protected Site	Country	Relevant Qualifying feature(s)	SACOs	Likely Significant Effects Concluded?
Menai Strait and Conwy Bay/Y Fenai a Bae Conwy SAC	Wales	• Sandbanks which are slightly covered by sea water all the time • Mudflats and sandflats not covered by seawater at low tide • Reefs • Large shallow inlets and bays • Submerged or partially submerged sea caves	See footnote[19]	✓
Dee Estuary/Aber Dyfrdwy SAC	England and Wales	• Sea lamprey *Petromyzon marinus* • River lamprey *Lampetra fluviatilis*	See footnote[20]	✓
River Dee and Bala Lake/Afon Dyfrdwy a Llyn Tegid SAC	England and Wales	• Sea lamprey *Petromyzon marinus* • Atlantic salmon *Salmo salar* • River lamprey *Lampetra fluviatilis*	See footnote[21]	✓
River Ehen SAC	England	• Atlantic salmon *Salmo salar* • Freshwater pearl mussel *Margaritifera margaritifera*	See footnote[22]	✓
River Eden SAC	England	• Sea lamprey *Petromyzon marinus* • Atlantic salmon *Salmo salar*	See footnote[23]	✓

[19] https://cdn.cyfoethnaturiol.cymru/687997/eng-menai-strait-reg-37-report-2018.pdf
[20] https://publications.naturalengland.org.uk/file/5834949009866752
[21] https://designatedsites.naturalengland.org.uk/TerrestrialAdvicePDFs/UK0030252.pdf
[22] https://designatedsites.naturalengland.org.uk/TerrestrialAdvicePDFs/UK0030057.pdf
[23] https://designatedsites.naturalengland.org.uk/TerrestrialAdvicePDFs/UK0012643.pdf

		• River lamprey *Lampetra fluviatilis*		
River Derwent and Bassenthwaite Lake SAC	England	• Sea lamprey *Petromyzon marinus* • Atlantic salmon *Salmo salar* • River lamprey *Lampetra fluviatilis*	See footnote[24]	✓
Solway Firth SAC	England and Scotland	• Sea lamprey *Petromyzon marinus* • River lamprey *Lampetra fluviatilis*	See footnote[25]	✓
River Kent SAC	England	• Freshwater pearl mussel *Margaritifera margaritifera*	See footnote[26]	✓
River Bladnoch SAC	Scotland	• Atlantic salmon *Salmo salar*	See footnote[27]	✓
Afon Gwyrfai a Llyn Cwellyn SAC	Wales	• Atlantic salmon *Salmo salar*	See footnote[28]	✓
North Anglesey Marine/Gogledd Môn Forol SAC	Wales	• Harbour porpoise *Phocoena phocoena*	See footnote[29]	✓
North Channel SAC	Northern Ireland	• Harbour porpoise *Phocoena phocoena*	See footnote[30]	✓
West Wales Marine/Gorllewin Cymru Forol SAC	Wales	• Harbour porpoise *Phocoena phocoena*	See footnote[31]	✓

[24] https://designatedsites.naturalengland.org.uk/TerrestrialAdvicePDFs/UK0030032.pdf
[25] http://publications.naturalengland.org.uk/publication/3189597?category=3212324
[26] https://designatedsites.naturalengland.org.uk/TerrestrialAdvicePDFs/UK0030256.pdf
[27] https://www.nature.scot/sites/default/files/special-area-conservation/8355/conservation-advice-package.pdf
[28] https://naturalresources.wales/media/670697/afon-gwyrfai-a-llyn-cwellyn-management-plan-_english_.pdf
[29] https://data.jncc.gov.uk/data/f4c19257-2341-46b3-8e29-49665cd8f3d2/NorthAnglesey-Conservation-Advice.pdf
[30] https://data.jncc.gov.uk/data/be0492aa-f1d6-4197-be22-e9a695227bdb/NorthChannel-conservation-advice.pdf
[31] https://naturalresources.wales/media/691803/west-wales-marine-conservation-objectives-and-advice-on-operations.pdf

Pen Llŷn a`r Sarnau/Lleyn Peninsula and the Sarnau SAC	Wales	• Bottlenose dolphin *Tursiops truncatus* • Grey seal *Halichoerus grypus*	See footnote[32]	✓
Strangford Lough SAC	Northern Ireland	• Harbour seal *Phoca vitulina*	See footnote[33]	✓
Murlough SAC	Northern Ireland	• Harbour seal *Phoca vitulina*	See footnote[34]	✓
Cardigan Bay/Bae Ceredigion SAC	Wales	• Bottlenose dolphin *Tursiops truncatus* • Grey seal *Halichoerus grypus*	See footnote[35]	✓
The Maidens SAC	Northern Ireland	• Grey seal *Halichoerus grypus*	See footnote[36]	✓
Pembrokeshire Marine/Sir Benfro Forol SAC	Wales	• Grey seal *Halichoerus grypus*	See footnote[37]	✓
Bristol Channel Approaches/Dynesfeydd Môr Hafren SAC	England and Wales	• Harbour porpoise *Phocoena phocoena*	See footnote[38]	✓

[32]https://naturalresources.wales/media/673816/Pen%20Llyn%20ar%20Sarnau%20%20R33%20Feb%202009.pdf

[33] https://www.daera-ni.gov.uk/sites/default/files/publications/doe/Strangford%20Lough%20SAC%20Conservation%20Objectives%202018_.pdf

[34] https://www.daera-ni.gov.uk/sites/default/files/publications/doe/Murlough%20SAC%20Conservation%20Objectives%202018%20%28002%29.pdf

[35] https://www.daera-ni.gov.uk/sites/default/files/publications/doe/Murlough%20SAC%20Conservation%20Objectives%202018%20%28002%29.pdf

[36] https://www.daera-ni.gov.uk/sites/default/files/publications/daera/The%20Maidens%20SAC%20Conservation%20Objectives%202017.PDF

[37] https://cyfoethnaturiol.cymru/media/687999/eng-pembrokeshire-marine-reg-37-report-2018.pdf

[38]https://cdn.cyfoethnaturiol.cymru/679449/bristolchannelapproachesconservationobjectivesandadviceonactivities.pdf

Lundy SAC	England	• Grey seal *Halichoerus grypus*	See footnote[39]	✓
Treshnish Isles SAC	Scotland	• Grey seal *Halichoerus grypus*	See footnote[40]	✗
Isles of Scilly Complex SAC	England	• Grey seal *Halichoerus grypus*	See foot note[41]	✓
Monach Islands SAC	Scotland	• Grey seal *Halichoerus grypus*	See foot note[42]	✗
North Rona SAC	Scotland	• Grey seal *Halichoerus grypus*	See foot note[43]	✗
Rockabill to Dalkey Island SAC	Republic of Ireland	• Harbour porpoise *Phocoena phocoena*	See foot note[44]	✓
Lambay Island SAC	Republic of Ireland	• Grey seal *Halichoerus grypus*	See foot note[45]	✗
Saltee Islands SAC	Republic of Ireland	• Grey seal *Halichoerus grypus*	See foot note[46]	✓
Horn Head and Rinclevan SAC	Republic of Ireland	• Grey seal *Halichoerus grypus*	See foot note[47]	✗
Slieve Tooey/Tormore Island/Loughros Beg Bay SAC	Republic of Ireland	• Grey seal *Halichoerus grypus*	See foot note[48]	✗

[39] https://designatedsites.naturalengland.org.uk/ConservationAdvice/SupplementaryAdvice.aspx?SiteCode=UK0013114&SiteName=lundy%20sac&SiteNameDisplay=Lundy+SAC&countyCode=&responsiblePerson=&SeaArea=&IFCAArea=&NumMarineSeasonality=1

[40] https://www.nature.scot/sites/default/files/special-area-conservation/8398/conservation-objectives.pdf

[41] https://designatedsites.naturalengland.org.uk/ConservationAdvice.aspx?SiteCode=UK0013694&SiteName=Isles%20of%20Scilly%20complex&SiteNameDisplay=Isles%20of%20Scilly%20Complex%20SAC&countyCode=&responsiblePerson=&SeaArea=&IFCAArea=&HasCA=1&NumMarineSeasonality=1&SiteNameDisplay=Isles%20of%20Scilly%20Complex%20SAC#hlco

[42] Monach Isles - Conservation and Management Advice - Final

[43] https://www.nature.scot/sites/default/files/special-area-conservation/8340/conservation-and-management-advice.pdf

[44] https://www.npws.ie/sites/default/files/protected-sites/conservation_objectives/CO003000.pdf

[45] https://www.npws.ie/sites/default/files/protected-sites/conservation_objectives/CO000204.pdf

[46] https://www.npws.ie/sites/default/files/protected-sites/conservation_objectives/CO000707.pdf

[47] https://www.npws.ie/sites/default/files/protected-sites/conservation_objectives/CO000147.pdf

[48] https://www.npws.ie/sites/default/files/protected-sites/conservation_objectives/CO000190.pdf

Duvillaun Islands SAC	Republic of Ireland	• Grey seal *Halichoerus grypus*	See foot note[49]	✗
Inishbofin and Inishshark SAC	Republic of Ireland	• Grey seal *Halichoerus grypus*	See foot note[50]	✗
Inishkea Islands SAC	Republic of Ireland	• Grey seal *Halichoerus grypus*	See foot note[51]	✗
Slyne Head Islands SAC	Republic of Ireland	• Grey seal *Halichoerus grypus*	See foot note[52]	✗
Roaringwater Bay and Islands SAC	Republic of Ireland	• Grey seal *Halichoerus grypus* • Harbour porpoise *Phocoena phocoena*	See foot note[53]	✓
Blasket Islands SAC	Republic of Ireland	• Grey seal *Halichoerus grypus* • Harbour porpoise *Phocoena phocoena*	See foot note[54]	✓
Mers Celtiques – Talus du golfe de Gascogne SCI	France	• Harbour porpoise *Phocoena phocoena*	See foot note[55]	✓
Abers – Côte des legendes SCI	France	• Harbour porpoise *Phocoena phocoena*	See foot note[56]	✓
Ouessant-Molène SCI	France	• Harbour porpoise *Phocoena phocoena*	See foot note[57]	✓
Côte de Granit rose-Sept-Iles SCI	France	• Harbour porpoise *Phocoena phocoena*	See foot note[58]	✓

[49] https://www.npws.ie/sites/default/files/protected-sites/conservation_objectives/CO000495.pdf
[50] https://www.npws.ie/sites/default/files/protected-sites/conservation_objectives/CO000278.pdf
[51] https://www.npws.ie/sites/default/files/protected-sites/conservation_objectives/CO000507.pdf
[52] https://www.npws.ie/sites/default/files/protected-sites/conservation_objectives/CO000328.pdf
[53] https://www.npws.ie/sites/default/files/protected-sites/conservation_objectives/CO000101.pdf
[54] https://www.npws.ie/sites/default/files/protected-sites/conservation_objectives/CO002172.pdf
[55] EUNIS -Site factsheet for Mers Celtiques - Talus du golfe de Gascogne
[56] EUNIS -Site factsheet for Abers - Côte des légendes
[57] EUNIS -Site factsheet for Ouessant-Molène
[58] EUNIS -Site factsheet for Cote de Granit Rose-Sept Iles

Anse de Goulven, dunes de Keremma SCI	France	• Harbour porpoise *Phocoena phocoena*	See foot note[59]	✓
Tregor Goëlo SCI	France	• Harbour porpoise *Phocoena phocoena*	See foot note[60]	✓
Côtes de Crozon SCI	France	• Harbour porpoise *Phocoena phocoena*	See foot note[61]	✓
Chaussée de Sein SCI	France	• Harbour porpoise *Phocoena Phocoena* • Grey seal *Halichoerus grypus*	See foot note[62]	✓
Cap Sizun SCI	France	• Harbour porpoise *Phocoena phocoena*	See foot note[63]	✓
Récifs du talus du golfe de Gascogne SCI	France	• Harbour porpoise *Phocoena phocoena*	See foot note[64]	✓
Anse de Vauville SCI	France	• Harbour porpoise *Phocoena phocoena*	See foot note[65]	✓
Cap d'Erquy-Cap Fréhel SCI	France	• Harbour porpoise *Phocoena phocoena*	See foot note[66]	✓
Baie de Saint-Brieuc – Est SCI	France	• Harbour porpoise *Phocoena phocoena*	See foot note[67]	✓
Banc et récifs de Surtainville SCI	France	• Harbour porpoise *Phocoena phocoena*	See foot note[68]	✓

[59] EUNIS -Site factsheet for Anse de Goulven, dunes de Keremma
[60] EUNIS -Site factsheet for Tregor Goëlo
[61] EUNIS -Site factsheet for Côtes de Crozon
[62] EUNIS -Site factsheet for Chaussée de Sein
[63] EUNIS -Site factsheet for Cap Sizun
[64] EUNIS -Site factsheet for Récifs du talus du golfe de Gascogne
[65] EUNIS -Site factsheet for Anse de Vauville
[66] EUNIS -Site factsheet for Cap d'Erquy-Cap Fréhel
[67] EUNIS -Site factsheet for Baie de Saint-Brieuc - Est
[68] EUNIS -Site factsheet for Banc et récifs de Surtainville

Baie de Lancieux, Baie de l'Arguenon, Archipel de Saint Malo et Dinard SCI	France	• Harbour porpoise *Phocoena phocoena*	See foot note[69]	✓
Estuaire de la Rance SCI	France	• Harbour porpoise *Phocoena phocoena*	See foot note[70]	✓
Baie du Mont Saint-Michel SCI	France	• Harbour porpoise *Phocoena phocoena*	See foot note[71]	✓
Liverpool Bay/Bae Lerpwl SPA	England and Wales	• Red-throated diver *Gavia stellata* • Little gull *Hydrocoloeus minutus* • Common scoter *Melanitta nigra* • Little tern *Sternula albifrons* • Common tern *Sterna hirundo* • Waterbird assemblage	See foot note[72]	✓
Irish Sea front SPA	UK Offshore Waters	• Manx Shearwater *Puffinus puffinus*	See foot note[73]	✓
North-west Irish Sea cSPA	Republic of Ireland	• Manx shearwater *Puffinus puffinus* (considered under Aberdaron Coast and Bardsey Island SPA, Copeland Islands SPA, and Skomer, Skokholm and the Seas off Pembrokeshire/Sgomer, Sgogwm a Moroedd Penfro SPA) • Lesser black-backed gull *Larus*	See foot note[74]	✗

[69] EUNIS -Site factsheet for Baie de Lancieux, Baie de l'Arguenon, Archipel de Saint Malo et Dinard
[70] EUNIS -Site factsheet for Estuaire de la Rance
[71] EUNIS -Site factsheet for Baie du Mont Saint-Michel
[72] Liverpool Bay/Bae Lerpwl SPA - UK9020294A
[73] Irish Sea Front SPA | JNCC - Adviser to Government on Nature Conservation
[74] https://www.npws.ie/sites/default/files/protected-sites/conservation_objectives/CO004236.pdf

		fuscus (considered under Lambay Island SPA) • Black-legged kittiwake *Rissa tridactyla* (considered under Lambay Island SPA, Ireland's Eye SPA, Howth Head SPA)		
Ribble and Alt Estuaries SPA	England	• Lesser black-backed gull *Larus fuscus*	See foot note[75]	✓
Ribble and Alt Estuaries Ramsar site	England	• Lesser black-backed gull *Larus fuscus*	N/A	✓
Morecambe Bay and Duddon Estuary SPA	England	• Lesser black-backed gull *Larus fuscus* • Herring gull *Larus argentatus*	See foot note[76]	✗
Bowland Fells SPA	England	• Lesser black-backed gull *Larus fuscus*	See foot note[77]	✓
Auskerry SPA	Scotland	• European storm petrol *Hydrobates pelagicus*	See foot note[78]	✗
Fair Isle SPA	Scotland	• Great Skua *Stercorarius skua* • Northern fulmar *Fulmarus glacialis*	See foot note[79]	✗
Fetlar SPA	Scotland	• Great Skua *Stercorarius skua*	See foot note[80]	✗

[75] https://publications.naturalengland.org.uk/file/5617578676584448
[76] https://publications.naturalengland.org.uk/file/6353663526436864
[77] https://designatedsites.naturalengland.org.uk/ConservationAdvice.aspx?SiteCode=UK9005151&SiteName=Bowland%20Fells&SiteNameDisplay=Bowland%20Fells%20SPA&countyCode=&responsiblePerson=&SeaArea=&IFCAArea=&HasCA=1&NumMarineSeasonality=0&SiteNameDisplay=Bowland%20Fells%20SPA#hlco
[78] https://www.nature.scot/sites/default/files/special-protection-area/8466/conservation-objectives.pdf
[79] https://www.nature.scot/sites/default/files/special-protection-area/8496/conservation-and-management-advice.pdf
[80] https://www.nature.scot/sites/default/files/special-protection-area/8498/conservation-and-management-advice.pdf

Foula SPA	Scotland	• Atlantic puffin *Fratercula arctica* • Great Skua *Stercorarius skua*	See foot note[81]	✕
Forth Islands SPA	Scotland	• Atlantic puffin *Fratercula arctica*	See foot note[82]	✕
Farne Islands SPA	England	• Atlantic puffin *Fratercula arctica*	See foot note[83]	✕
Hermaness, Saxa Vord and Valla Field SPA	Scotland	• Northern gannet *Morus bassanus* • Great Skua *Stercorarius skua* • Atlantic puffin *Fratercula arctica*	See foot note[84]	✕
Hoy SPA	Scotland	• Great Skua *Stercorarius skua*	See foot note[85]	✕
Mousa SPA	Scotland	• European storm petrol *Hydrobates pelagicus*	See foot note[86]	✕
Noss SPA	Scotland	• Great Skua *Stercorarius skua* • Northern gannet *Morus bassanus*	See foot note[87]	✕
Priest Island (Summer Isles) SPA	Scotland	• European storm petrol *Hydrobates pelagicus*	See foot note[88]	✕
Ronas Hill – North Roe and Tingon SPA	Scotland	• Great Skua *Stercorarius skua*	See foot note[89]	✕

[81] https://www.nature.scot/sites/default/files/special-protection-area/8504/conservation-and-management-advice.pdf
[82] https://www.nature.scot/sites/default/files/special-protection-area/8500/conservation-and-management-advice.pdf
[83] https://designatedsites.naturalengland.org.uk/ConservationAdvice/SupplementaryAdvice.aspx?SiteCode=UK9006021&SiteName=farne%20island&SiteNameDisplay=Farne+Islands+SPA&countyCode=&responsiblePerson=&SeaArea=&IFCAArea=&NumMarineSeasonality=5
[84] https://www.nature.scot/sites/default/files/special-protection-area/8512/conservation-and-management-advice.pdf
[85] https://www.nature.scot/sites/default/files/special-protection-area/8513/conservation-and-management-advice.pdf
[86] https://www.nature.scot/sites/default/files/special-protection-area/8551/conservation-objectives.pdf
[87] https://www.nature.scot/sites/default/files/special-protection-area/8561/conservation-and-management-advice.pdf
[88] https://www.nature.scot/sites/default/files/special-protection-area/8567/conservation-objectives.pdf
[89] https://www.nature.scot/sites/default/files/special-protection-area/8572/conservation-objectives.pdf

Treshnish Isles SPA	Scotland	• European storm petrol *Hydrobates pelagicus*	See foot note[90]	✗
Aberdaron Coast and Bardsey Island SPA	England and Wales	• Manx Shearwater *Puffinus puffinus*	See foot note[91]	✓
Lambay Island SPA	Republic of Ireland	• Atlantic puffin *Fratercula arctica* • Lesser black-backed gull *Larus fuscus* • Black-legged kittiwake *Rissa tridactyla*	See foot note[92]	✓
Howth Head Coast SPA	Republic of Ireland	• Black-legged kittiwake *Rissa tridactyla*	See foot note[93]	✓
Ireland's Eye SPA	Republic of Ireland	• Black-legged kittiwake *Rissa tridactyla*	See foot note[94]	✓
Copeland Islands SPA	Northern Ireland	• Manx Shearwater *Puffinus puffinus*	See foot note[95]	✓
Wicklow Head SPA	Republic of Ireland	• Black-legged kittiwake *Rissa tridactyla*	See foot note[96]	✗
Ailsa Craig SPA	Scotland	• Northern gannet *Morus bassanus* • Black-legged kittiwake *Rissa tridactyla* • Lesser black-backed gull *Larus fuscus*	See foot note[97]	✓

[90] https://www.nature.scot/sites/default/files/special-protection-area/8586/conservation-objectives.pdf
[91] https://designatedsites.naturalengland.org.uk/ConservationAdvice.aspx?SiteCode=UK9005151&SiteName=Bowland%20Fells&SiteNameDisplay=Bowland%20Fells%20SPA&countyCode=&responsiblePerson=&SeaArea=&IFCAArea=&HasCA=1&NumMarineSeasonality=0&SiteNameDisplay=Bowland%20Fells%20SPA#hlco
[92] Lambay Island SPA | National Parks & Wildlife Service
[93] https://www.npws.ie/sites/default/files/protected-sites/conservation_objectives/CO004113.pdf
[94] https://www.npws.ie/sites/default/files/protected-sites/conservation_objectives/CO004117.pdf
[95] https://www.daera-ni.gov.uk/sites/default/files/publications/doe/copeland-islands-SPA-conservation-objectives-2015.pdf
[96] https://www.npws.ie/sites/default/files/protected-sites/conservation_objectives/CO004127.pdf
[97] https://www.nature.scot/sites/default/files/special-protection-area/8463/conservation-and-management-advice.pdf

Rathlin Island SPA	Northern Island	• Atlantic puffin *Fratercula arctica* • Black-legged kittiwake *Rissa tridactyla* • Lesser black-backed gull *Larus fuscus*	See foot note[98]	✓
Skomer, Skokholm and the Seas Off Pembrokeshire/Sgomer, Sgogwm a Moroedd Penfro SPA	Wales and UK Offshore Waters	• Atlantic puffin *Fratercula arctica* • European storm petrol *Hydrobates pelagicus* • Lesser black-backed gull *Larus fuscus* • Manx Shearwater *Puffinus puffinus* • Seabird assemblage (breeding) including the component: Black-legged kittiwake *Rissa tridactyla*	See foot note[99]	✓
Grassholm SPA	Wales	• Northern fulmar *Fulmarus glacialis* • Northern gannet *Morus bassanus*	See foot note[100]	✓
Saltee Islands SPA	Republic of Ireland	• Black-legged kittiwake *Rissa tridactyla* • Northern fulmar *Fulmarus glacialis* • Northern gannet *Morus bassanus* • Atlantic puffin *Fratercula arctica*	See foot note[101]	✓

[9898] https://www.daera-ni.gov.uk/publications/rathlin-spa-guidance-and-literature

[99] https://naturalresources.wales/media/675733/skomer-skokholm-and-seas-off-pembs-pspa-draft-conservation-objectives-final.pdf

[100] Core Management Plan Including Conservation Objectives For Grassholm Spa

[101] https://www.npws.ie/sites/default/files/protected-sites/conservation_objectives/CO004002.pdf

North Colonsay and Western Cliffs SPA	Scotland	• Black-legged kittiwake *Rissa tridactyla*	See foot note[102]	✓
Helvick Head to Ballyquin SPA	Republic of Ireland	• Black-legged kittiwake *Rissa tridactyla*	See foot note[103]	✗
Rum SPA	Scotland	• Manx Shearwater *Puffinus puffinus*	See foot note[104]	✓
Cruagh Island SPA	Republic of Ireland	• Manx Shearwater *Puffinus puffinus*	See foot note[105]	✗
Blasket Islands SPA	Republic of Ireland	• Northern fulmar *Fulmarus glacialis* • Manx Shearwater *Puffinus puffinus*	See foot note[106]	✗
Deenish Island and Scariff Island SPA	Republic of Ireland	• Northern fulmar *Fulmarus glacialis* • Manx Shearwater *Puffinus puffinus*	See foot note[107]	✗
Puffin Island SPA	Republic of Ireland	• Northern fulmar *Fulmarus glacialis* • Manx Shearwater *Puffinus puffinus*	See foot note[108]	✗
Shiant Isles SPA	Scotland	• Northern fulmar *Fulmarus glacialis*	See foot note[109]	✓
Skelligs SPA	Republic of Ireland	• Northern fulmar *Fulmarus glacialis* • Manx Shearwater *Puffinus puffinus* • Northern gannet *Morus bassanus*	See foot note[110]	✓

[102] https://www.nature.scot/sites/default/files/special-protection-area/8555/conservation-and-management-advice.pdf
[103] https://www.npws.ie/sites/default/files/protected-sites/conservation_objectives/CO004192.pdf
[104] https://www.nature.scot/sites/default/files/special-protection-area/8574/conservation-and-management-advice.pdf
[105] https://www.npws.ie/sites/default/files/protected-sites/conservation_objectives/CO004170.pdf
[106] https://www.npws.ie/sites/default/files/protected-sites/conservation_objectives/CO004008.pdf
[107] https://www.npws.ie/sites/default/files/protected-sites/conservation_objectives/CO004175.pdf
[108] https://www.npws.ie/sites/default/files/protected-sites/conservation_objectives/CO004003.pdf
[109] https://www.nature.scot/sites/default/files/special-protection-area/8575/conservation-and-management-advice.pdf
[110] https://www.npws.ie/sites/default/files/protected-sites/conservation_objectives/CO004007.pdf

Handa SPA	Scotland	• Northern fulmar *Fulmarus glacialis*	See foot note[111]	✓
St Kilda SPA	Scotland	• Northern fulmar *Fulmarus glacialis* • Manx Shearwater *Puffinus puffinus* • Northern gannet *Morus bassanus*	See foot note[112]	✓
Cape Wrath SPA	Scotland	• Northern fulmar *Fulmarus glacialis*	See foot note[113]	✓
Flannan Isles SPA	Scotland	• Northern fulmar *Fulmarus glacialis*	See foot note[114]	✓
Fowlsheugh SPA	Scotland	• Black legged kittiwake *Rissa tridactyla*	See foot note[115]	✓
Flamborough and Filey Coast SPA	England	• Black legged kittiwake *Rissa tridactyla*	See foot note[116]	✓
Canna and Sanday SPA	Scotland	• Black legged kittiwake *Rissa tridactyla*	See foot note[117]	✓
Buchan Ness to Collieston SPA	Scotland	• Black legged kittiwake *Rissa tridactyla*	See foot note[118]	✓

[111] https://www.nature.scot/sites/default/files/special-protection-area/8511/conservation-and-management-advice.pdf

[112][112] https://www.nature.scot/sites/default/files/special-protection-area/8580/conservation-and-management-advice.pdf

[113] https://www.nature.scot/sites/default/files/special-protection-area/8481/conservation-and-management-advice.pdf

[114] https://www.nature.scot/sites/default/files/special-protection-area/8502/conservation-and-management-advice.pdf

[115] https://www.nature.scot/sites/default/files/special-protection-area/8505/conservation-and-management-advice.pdf

[116]https://designatedsites.naturalengland.org.uk/ConservationAdvice/SupplementaryAdvice.aspx?SiteCode=UK9006101&SiteName=Flamborough&SiteNameDisplay=Flamborough+and+Filey+Coast+SPA&countyCode=&responsiblePerson=&SeaArea=&IFCAArea=&NumMarineSeasonality=4

[117] https://www.nature.scot/sites/default/files/special-protection-area/8480/conservation-and-management-advice.pdf

[118] https://www.nature.scot/sites/default/files/special-protection-area/8473/conservation-and-management-advice.pdf

Mingulay and Berneray SPA	Scotland	• Common guillemot *Uria aalge* • Razorbill *Alca Torda*	See foot note[119]	✓
Isles of Scilly SPA	England	• Great black-backed gull *Larus marinus*	See foot note[120]	✓
Troup, Pennan and Lions Heads SPA	Scotland	• Black legged kittiwake *Rissa tridactyla*	See foot note[121]	✓
East Caithness Cliffs SPA	Scotland	• Black legged kittiwake *Rissa tridactyla*	See foot note[122]	✓
North Caithness Cliffs SPA	Scotland	• Black legged kittiwake *Rissa tridactyla*	See foot note[123]	✓
Sule Skerry and Sule Stack SPA	Scotland	• Common guillemot *Uria aalge*	See foot note[124]	✓
North Rona and Sula Sgeir SPA	Scotland	• Common guillemot *Uria aalge*	See foot note[125]	✓
West Westray SPA	Scotland	• Black legged kittiwake *Rissa tridactyla*	See foot note[126]	✓
The Dee Estuary SPA	England and Wales	• Northern pintail *Anas acuta* • Eurasian teal *Anas crecca* • Dunlin *Calidris alpina alpina*	See foot note[127]	✗

[119] https://www.nature.scot/sites/default/files/special-protection-area/8545/conservation-and-management-advice.pdf

[120]https://designatedsites.naturalengland.org.uk/ConservationAdvice/SupplementaryAdvice.aspx?SiteCode=UK9020288&SiteName=isles%20of%20scilly&SiteNameDisplay=Isles+of+Scilly+SPA&countyCode=&responsiblePerson=&SeaArea=&IFCAArea=&NumMarineSeasonality=4

[121] https://www.nature.scot/sites/default/files/special-protection-area/8587/conservation-and-management-advice.pdf

[122] https://www.nature.scot/sites/default/files/special-area-conservation/8248/conservation-advice-package.pdf

[123] https://www.nature.scot/sites/default/files/special-protection-area/8554/conservation-and-management-advice.pdf

[124] https://www.nature.scot/sites/default/files/special-protection-area/8581/conservation-and-management-advice.pdf

[125] https://www.nature.scot/sites/default/files/special-protection-area/8558/conservation-and-management-advice.pdf

[126] https://www.nature.scot/sites/default/files/special-protection-area/8589/conservation-and-management-advice.pdf

[127] https://publications.naturalengland.org.uk/file/5008539580104704

		• Red knot *Calidris canutus* • Eurasian oystercatcher *Haematopus ostralegus* • Bar-tailed godwit *Limosa lapponica* • Black-tailed godwit *Limosa limosa islandica* • Eurasian curlew *Numenius arquata* • Grey plover *Pluvialis squatarola* • Common shelduck *Tadorna tadorna* • Common redshank *Tringa totanus* • Northern lapwing *Vanellus vanellus*		
The Dee Estuary Ramsar site	England and Wales	• Common redshank *Tringa totanus* • Eurasian Teal *Anas crecca* • Common shelduck *Tadorna tadorna* • Eurasian oystercatcher *Haematopus ostralegus* • Eurasian curlew *Numenius arquata* • Northern pintail *Anas acuta* • Grey plover *Pluvialis squatarola* • Red knot *Calidris canutus* • Black-tailed godwit *Limosa limosa islandica* • Bar-tailed godwit *Limosa lapponica*	N/A	✕

Traeth Lafan/Lavan Sands, Conway Bay SPA	Wales	• Eurasian oystercatcher *Haematopus ostralegus* • Red-breasted merganser *Mergus Serrator* • Eurasian curlew *Numenius arquata* • Great crested grebe *Podiceps cristatus* • Common redshank *Tringa totanus*	See foot notes[128]	✕
Dyfi Estuary/Aber Dyfi SPA	Wales	• Greeenland white-fronted goose *Anser albifrons flavirostris*	See foot notes[129]	✕
Burry Inlet SPA	Wales	• Northern pintail *Anas acuta* • Northern shoveler *Spatula clypeata* • Eurasian teal • Eurasian wigeon *Mareca penelope* • Turnstone *Arenaria interpres* • Dunlin *Calidris alpina* • Red knot *Calidris canutus* • Eurasian oystercatcher *Haematopus ostralegus* • Eurasian curlew *Numenius arquata* • *Eurasian golden plover Pluvialis apricaria* • Common shelduck *Tadorna tadorna*	See foot notes[130]	✕

[128] https://naturalresources.wales/media/674184/Traeth%20Lafan%20SAC%20Plan%2021[1].4.08%20English.pdf

[129] https://naturalresources.wales/media/671834/Dyfi%20SPA-Plan%20English.pdf

[130] https://www.naturalresources.wales/media/673515/Carmarthen%20Bay%20R33%20Advice%20February%202009.pdf

		• Common redshank *Tringa totanus*		
Burry Inlet Ramsar site	Wales	• Northern pintail *Anas acuta* • Northern shoveler *Spatula clypeata* • Eurasian oystercatcher *Haematopus ostralegus*	N/A	✕
Severn Estuary SPA	England and Wales	• Gadwall *Anas strepera* • European white-fronted goose *Anser albifrons albifrons* • Dunlin *Calidris alpina* • Bewick's swan *Cygnus columbianus* • Common shelduck *Tadorna tadorna* • Common redshank *Tringa totanus*	See foot notes[131]	✕
Severn Estuary Ramsar site	England and Wales	• Gadwall *Mareca strepera* • European white-fronted goose *Anser albifrons* • Dunlin *Calidris alpina* • Bewick's swan *Cygnus columbianus* • Common shelduck *Tadorna tadorna* • Common redshank *Tringa totanus*	N/A	✕

[131] https://publications.naturalengland.org.uk/file/6288530213175296