

OGN 200 Form 1B

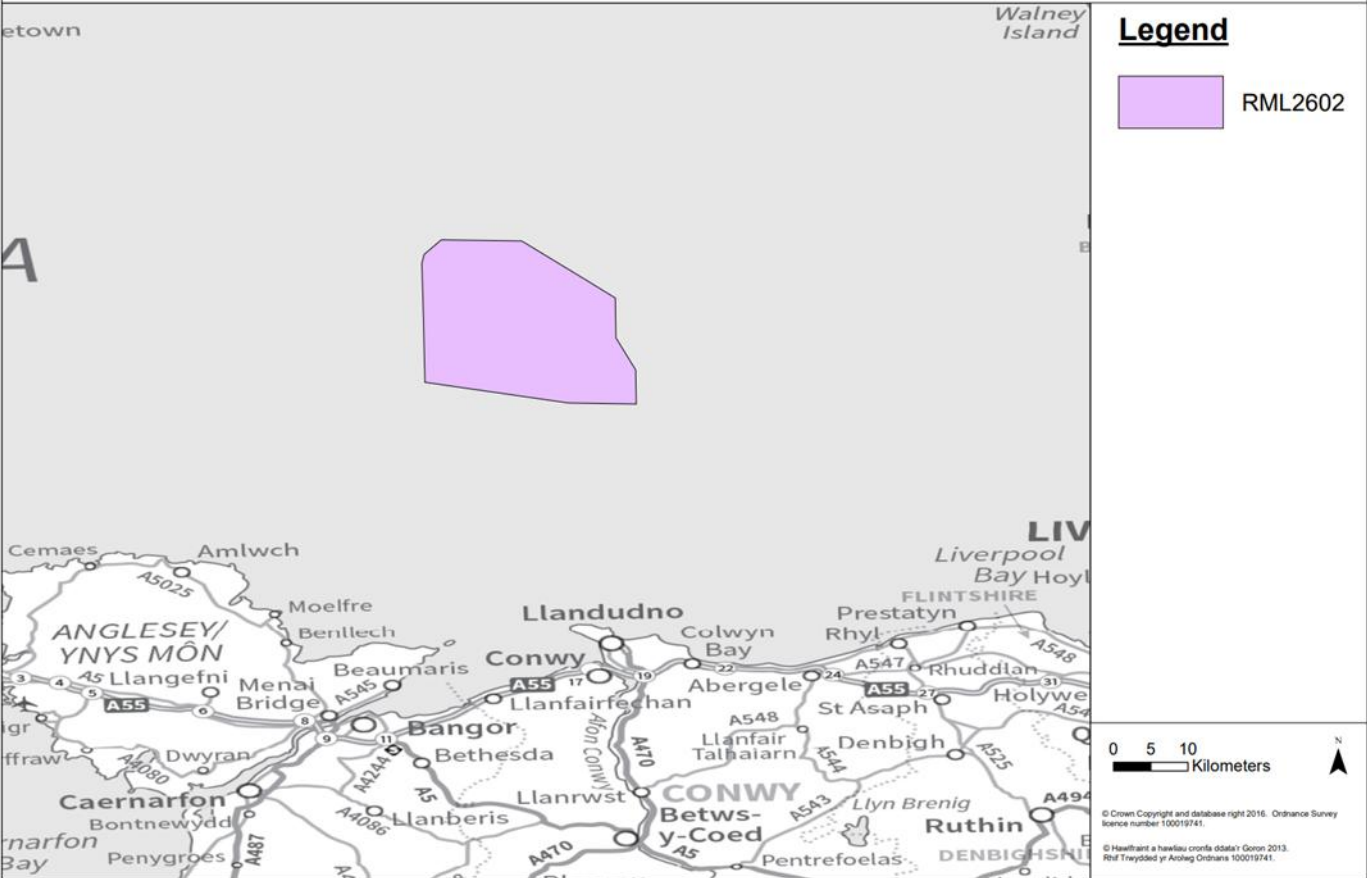
Record of a Habitats Regulations Assessment

Plan or project name, brief description or application reference number	Mona Offshore Wind Project Array Area Geotechnical Survey
HRA iteration/version	2

1. Plan or Project Details

Information about the plan or project.		
1	Date application received	12 January 2026
2	Applicant details	Mona Offshore Wind Limited
3	NRW team responsible for carrying out, or requiring to be carried out, the plan or project,	N/A

	and name of lead officer	
4	Activity/ies proposed	The proposed site investigation surveys (shallow and deep geotechnical site investigations) are located within the <u>Mona Array Area only</u>, with the aim to commence surveys in April 2026. The objectives of the geotechnical survey is to establish the characteristics and properties of the different seabed substrates within the array area to inform the design of the Mona Offshore Windfarm. Data will be acquired to investigate the seabed conditions relevant to the design of the foundations of the wind turbine generators, substations, and inter-array cable routing. The surveys proposed within this MLA consist of: Deep geotechnical surveys, including: - Up to 80 composite boreholes with downhole in situ testing; and - The option for Piezo Cone Penetration Tests (PCPT), Discretionary Pore Pressure Dissipation Tests (PPDT) and High Pressure Dilatometer (HPD) downhole Pressuremeter. Shallow geotechnical surveys, including: - Up to 500 vibrocores; - Cone Penetrometer Testing (CPT); and - Thermal Resistivity Testing (TRT). It is noted that CPTs and TRTs, together with PCPTs, PPDTs and HPDs carried out within the boreholes, do not involve the removal of any seabed sediment, these are considered nonlicensable activities under the Marine and Coastal Access Act These activities have been included in this SID for completeness and for information only. A licence is requested from 01 April 2026 extending until 31 October 2028 to allow contingency in the programme should the survey be delayed.
5	Relevant legislation or statutory basis	Marine and Coastal Access Act 2009

6	Location	 Cyfoeth Naturiol Cymru Natural Resources Wales RML2602 - Mona Offshore Wind Project Array Area Geotechnical Surveys 
7	Plan or project documents, including any application documents	RML2602 - Mona Array Geotechnical Survey Marine Works Licence Application Form (002) RML2602 - Mona Array Geotechnical Survey Marine Works Licence Supporting Information Document RML2602 - Copy of Mona Array Geotechnical Survey Marine Works Licence Coordinates RML2602 - Mona Array Geotechnical Survey Marine Works Licence Shapefile RML2602 - Mona Geotechnical Survey Archaeological Method Statement

8	Environmental Statement	N/A
9	Pre-application correspondence	N/A
10	NRW team responsible for preparing this HRA report, and lead officer	Stephen Treby - Marine Licensing Team
11	Team or person responsible for approving the plan or project (competent authority role)	As above

2. Determining the need for a Habitats Regulations Assessment

2.1 Is there any possibility that the plan or project could negatively affect any European sites?	Yes
2.2 Is the whole of the plan or project directly and only connected with or necessary to the management of one or more European sites, for the purposes of conserving the habitats or species for which the European site(s) is/are designated?	No
2.3 Is there a possibility that the plan or project could affect any other feature of the European site(s) concerned, or of another European site, in a way that would undermine that feature's conservation objectives?	N/A

3. Considering the likelihood of a significant effect (LSE)

3.1 Renewal of a project authorisation on the same or more restrictive terms as an extant authorisation

Is this a renewal of an extant authorisation which complies with NRW approved criteria for ruling out significant effects of renewals (see Part 2 of OGN200) without conducting a project-specific LSE test?	No
---	----

3.2 Likelihood of significant effects (LSE) test

3.2.1 Which European sites might be affected by the plan or project?

(a)	Based on the plan or project specification, or information provided in the application, it is considered that these European sites have features which could be negatively affected by the plan or project	Based on the project specification or information provided in the application, it is considered that the following Natura 2000 sites have features which could be affected by the project: The survey area is located within the Irish Sea and does not overlap with any marine mammal protected site. However, considering the mobile nature of all Annex II marine mammal features of protected sites, the Marine Mammal Management Unit approach has been taken. The closest SAC for marine mammals is the <u>harbour porpoise</u> site North Anglesey Marine/ Gogledd Môn Forol SAC at a distance of 22.6 km. Other harbour porpoise sites within the MMMU are Gorllewin Cymru Forol / West Wales Marine SAC and Dynesfeydd Môr Hafren / Bristol Channel Approaches SAC The following sites have also been considered: for <u>bottlenose dolphin</u> Pen Llŷn a'r Sarnau SAC and Bae Ceredigion / Cardigan Bay SAC; and for <u>grey seal</u> Pen Llŷn a'r Sarnau SAC, Bae Ceredigion / Cardigan Bay SAC and Sir Benfro Forol / Pembrokeshire Marine SAC.
-----	--	--

		The North Anglesey Marine SAC is the closest Harbour Porpoise SAC and therefore, by inference/iterative assessment, a similar conclusion can be made for Harbour porpoise SACs further away. Given the localised and temporary impact, any impacts on other marine mammals (all of which are less abundant in the study area) would be negligible. Liverpool Bay SPA
(b)	The potential for the plan or project to negatively affect these European sites was also initially considered, but can be ruled out without further consideration	N/A

3.2.2 Screening for likelihood of significant effect

Table 3.2.2 Screening assessment			
Designated site feature	Relevant conservation objectives	Screening conclusion – ‘SCREEN OUT’, ‘SCREEN IN’ or ‘IN COMB’	Explanation
Liverpool Bay/Bae Lerpwl SPA			
Red-throated diver <i>Gavia stellata</i> (in non-breeding season)	NRW, Natural England and JNCC conservation objectives: liverpool-bay-bae-lerpwl-spa-conservation-advice.pdf (naturalresources.wales)	Screen in	The Liverpool Bay SPA is over 10km away and as such, no direct impacts from the geotechnical investigation works are expected. However, there is the potential for disturbance or displacement if vessels transit through the SPA.

Little gull <i>Hydrocoloeus minutus</i> (in non-breeding season)	NRW, Natural England and JNCC conservation objectives: liverpool-bay-bae-lerpwl-spa-conservation-advice.pdf (naturalresources.wales)	Screen Out	The Liverpool Bay SPA is over 10km away and as such, no direct impacts from the geotechnical investigation works are expected. Little gull, common tern and little tern have low vulnerability to disturbance (Furness et al., 2013; Fleissbach et al., 2019).
Common scoter <i>Melanitta nigra</i> (in non-breeding season)	NRW, Natural England and JNCC conservation objectives: liverpool-bay-ba7e-lerpwl-spa-conservation-advice.pdf (naturalresources.wales)	Screen In	The Liverpool Bay SPA is over 10km away and as such, no direct impacts from the geotechnical investigation works are expected. However, there is the potential for disturbance or displacement if vessels transit through the SPA.
Little tern <i>Sternula albifrons</i> (in breeding season)	NRW, Natural England and JNCC conservation objectives: liverpool-bay-bae-lerpwl-spa-conservation-advice.pdf (naturalresources.wales)	Screen out	The Liverpool Bay SPA is over 10km away and as such, no direct impacts from the geotechnical investigation works are expected. Little gull, common tern and little tern have low vulnerability to disturbance (Furness et al., 2013; Fleissbach et al., 2019).

Common tern <i>Sterna hirundo</i> (in breeding season)	NRW, Natural England and JNCC conservation objectives: liverpool-bay-bae-lerpwl-spa- conservation-advice.pdf (naturalresources.wales)	Screen out	The Liverpool Bay SPA is over 10km away and as such, no direct impacts from the geotechnical investigation works are expected. Little gull, common tern and little tern have low vulnerability to disturbance (Furness et al., 2013; Fleissbach et al., 2019).
Waterbird assemblage	NRW, Natural England and JNCC conservation objectives: liverpool-bay-bae-lerpwl-spa- conservation-advice.pdf (naturalresources.wales)	Screen In	The Liverpool Bay SPA is over 10km away and as such, no direct impacts from the geotechnical investigation works are expected. However, there is the potential for disturbance or displacement if vessels transit through the SPA.
North Anglesey Marine SAC (closest site at 22.6 km) Gorllewin Cymru Forol / West Wales Marine SAC Dynesfeydd Môr Hafren / Bristol Channel Approaches SAC			

Harbour Porpoise (Phocoena phocaena)	North Anglesey Marine pSAC: Draft Conservation Objectives and Advice on Activities (naturalresources.wales) West Wales Marine pSAC: Draft Conservation Objectives and Advice on Activities (naturalresources.wales) Bristol Channel Approaches pSAC: Draft Conservation Objectives and Advice on Activities (naturalresources.wales)	Screened out	This application is for the removal of sediment and bedrock material through borehole and vibrocore/piston core geotechnical site investigation works. Up to 25 boreholes and 750 vibrocores/piston cores are expected to be taken. The proposed survey may cause acoustic disturbance during survey activities and disturbance from the presence of vessels. The survey area is located within the Celtic and Irish Seas harbour porpoise Marine Mammal Management Unit (MMM), and the closest SAC is North Anglesey Marine/ Gogledd Môn Forol SAC at a distance of 22.6 km. Geotechnical drilling (rotary) typically generates noise levels between 2Hz – 50kHz at 160 dB re 1µPa @ 1m, whilst a suitable proxy noise source level for vibrocoreing is approximately 187.4 dB re 1 µPa @ 1m. (Chorney et al., 2011), both of which are within the hearing range of species such as grey seal, mid-frequency dolphin species (bottlenose, common, Risso's) and harbour porpoise (as per NMFS 2018; Southall et al 2019; Tougaard 2021). However, the survey area is located at a reasonable distance from the closest SAC, North Anglesey Marine, which is 22.6km away. Moreover, the licensed activities will be short lived, and noise will be mostly generated near or in the sediment resulting in much reduced noise levels. Literature on behavioural disturbance from rotary drilling is sparse, and therefore, if we assume that drilling has similar properties to dredging activity, disturbance of marine mammals could realistically occur between 400m – 7 km from the noise source. Assuming a precautionary disturbance radius of 7 km, this will not overlap with the North Anglesey Marine SAC and thus there is no plausible impact on the conservation objectives of the site related to disturbance "preventing their use of significant parts of the site (disturbance / displacement)". Hence, we can conclude no likely significant effect.
Pen Llŷn a'r Sarnau SAC Bae Ceredigion / Cardigan North SAC			

Bottlenose dolphin Grey Seal	Pen Llŷn a'r Sarnau / Lleyn Peninsula and the Sarnau Conservation Objectives Contents (naturalresources.wales) Bae Ceredigion / Cardigan North Conservation Objectives Contents (naturalresources.wales)	Screened Out	This application is for the removal of sediment and bedrock material through borehole and vibrocore/piston core geotechnical site investigation works. Up to 25 boreholes and 750 vibrocores/piston cores are expected to be taken. The proposed survey may cause acoustic disturbance during survey activities and disturbance from the presence of vessels. The survey area is located within the grey seals and bottle nose dolphin Marine Mammal Management Unit (MMMU), and the closest SAC for both species is the Pen Llŷn a'r Sarnau / Lleyn Peninsula SAC. Geotechnical drilling (rotary) typically generates noise levels between 2Hz – 50kHz at 160 dB re 1µPa @ 1m, whilst a suitable proxy noise source level for vibrocoreing is approximately 187.4 dB re 1 µPa @ 1m. (Chorney et al., 2011), both of which are within the hearing range of species such as grey seal, mid-frequency dolphin species (bottlenose, common, Risso's) and harbour porpoise (as per NMFS 2018; Southall et al 2019; Tougaard 2021). However, the survey area is located at a considerable distance from any of the SACs. Moreover, the licensed activities will be short lived, and noise will be mostly generated near or in the sediment resulting in much reduced noise levels. Furthermore, bottlenose dolphins in Welsh waters have been recorded most frequently in the coastal zone (NRW, 2018) and as a result of the location of the works, the potential for overlap with areas of high density is reduced (Evans & Waggit 2023).
Sir Benfro Forol / Pembrokeshire Marine SAC			

Grey Seal	Pembrokeshire Marine Conservation Objectives Contents (naturalresources.wales)	Screened Out	This application is for the removal of sediment and bedrock material through borehole and vibrocore/piston core geotechnical site investigation works. Up to 25 boreholes and 750 vibrocores/piston cores are expected to be taken. The proposed survey may cause acoustic disturbance during survey activities and disturbance from the presence of vessels. The survey area is located within the grey seals Marine Mammal Management Unit (MMMU), and the closest SAC for the species is the Pen Llŷn a'r Sarnau / Llyn Peninsula SAC. Geotechnical drilling (rotary) typically generates noise levels between 2Hz – 50kHz at 160 dB re 1µPa @ 1m, whilst a suitable proxy noise source level for vibrocoreing is approximately 187.4 dB re 1 µPa @ 1m. (Chorney et al., 2011), both of which are within the hearing range of species such as grey seal, mid-frequency dolphin species (bottlenose, common, Risso's) and harbour porpoise (as per NMFS 2018; Southall et al 2019; Tougaard 2021). However, the survey area is located at a considerable distance from any of the SACs. Moreover, the licensed activities will be short lived, and noise will be mostly generated near or in the sediment resulting in much reduced noise levels. In addition, there is an array of alternative habitat that remains available to grey seals within the relevant Marine Mammal Management Unit (MMMU). As such, no LSE is expected.
-----------	---	--------------	--

TABLE 3.2.3 Screening decision of the plan or project 'alone'	
(a) If the screening conclusion for <u>all</u> features for all sites in Table 3.2.2 is 'SCREEN OUT'	~~The plan or project is not likely to have a significant effect on any European site, and no further consideration under the Habitats Regulations is required in order to determine the approval/application.~~
(b) If the conclusion for <u>any</u> features in Table 3.2.2 is 'SCREEN IN'	The plan or project is likely to have a significant effect on one or more European sites and therefore an appropriate assessment is required.

(c) If there are <u>no</u> features in Table 3.2.2 that are 'SCREEN IN' and <u>any</u> features that are 'IN COMB'	~~The plan or project is not likely to have a significant effect on any European sites when considered alone, but the possibility of significant effects in combination with other plans and projects needs to be considered.~~
---	--

4. Appropriate assessment of the plan or project when considered alone

4.1 Assessment of plan or project as defined

Table 4.1 Appropriate assessment			
European site feature/s	Description of impacts	Assessment in view of conservation objectives	Can adverse effect on site integrity be ruled out? 'YES' or 'NO'
Liverpool Bay/Bae Lerpwl SPA			
Red-throated diver <i>Gavia stellata</i> (in non-breeding season)	NON-PHYSICAL DISTURBANCE	Disturbance or displacement of birds undermines the conservation objectives which seek to maintain or enhance their populations. Of the classified populations listed for this site, red-throated diver is considered the most sensitive to disturbance or displacement from vessel presence. SNCB advice currently states that disturbance to this species may occur within a range of 10 km (JNCC, 2022). As such, it is considered there is minimal risk of visual disturbance/displacement from the survey itself as it will be undertaken at least 10km from Liverpool Bay SPA. Ports for use during the survey are not yet confirmed. However, the preferred ports are currently as follows: - Barrow - Holyhead - Liverpool Of these ports, only the Port of Liverpool (if it is used at all) will involve vessels to transiting through the Liverpool Bay SPA. Furthermore, best practice vessel management measures will be adhered to, including:	Yes
Common scoter <i>Melanitta nigra</i> (in non-breeding season)			
Waterbird assemblage			

		- Adhering to the Wildlife Safe (WiSe) Scheme - Use of regular vessel transit routes which follow, where possible, established shipping routes to minimise disturbance - Where it is necessary for vessels to go outside of established navigational routes during transit to/from port and working areas, routes will be pre-selected to avoid locations where birds are known to aggregate and visible aggregations of rafting birds (inside or outside of the Liverpool Bay/Bae Lerpwl SPA) will be actively avoided within the limitations of vessel safety and manoeuvrability.	
--	--	--	--

4.3 Concluding the appropriate assessment of the plan or project alone

Table 4.3 Conclusion of the appropriate assessment alone	
(a) If Table 4.1, or the right hand column of Table 4.2 if applicable, is 'YES' for all features	It has been ascertained that the plan or project, when considered alone, will not adversely affect the integrity of any European sites.
(b) If there are any 'NO's in the right hand column of Table 4.2	~~It has not been ascertained that the plan or project, when considered alone, will not adversely affect the integrity of one or more European sites.~~
(c) Are there are any residual effects of the plan or project (net of mitigation measures) which, though not adverse on their own, could be significant when considered in combination with the effects of other plans or projects?	No

5. In combination assessment

Table 5.1 Identification and assessment of in combination effects				
European site name:				
'INCOMB' impacts from screening Table 3.2.2 and/or residual effect from appropriate assessment in section 4	European site feature(s) concerned	Other plans or projects with effects that might interact with the effects of the plan or project to render its effects significant/adverse (if any)	Nature of the in combination effect (if any) and assessment in view of conservation objectives	Can significant or adverse in combination effects be ruled out for all features?
(a) If the right hand column is ‘YES’ for all rows				

(b) If any rows in the right hand column are 'NO'	
--	--

Table 5.2 Addressing in combination effects		
In combination effect	Additional imposed mitigation measures,	Taking into account any additional measures identified and how they would be applied, can adverse effects on site features from in combination effects be ruled out? 'YES' or 'NO'
	N/A	
In combination assessment: conclusion		
(a) If the right hand column is 'YES' in all cases	It can be concluded that the plan or project will not adversely affect the integrity of any European sites, either alone or in combination with other plans or projects.	
(b) If any row is 'NO' in the right hand column	It <u>cannot</u> be concluded that the plan or project will not adversely affect the integrity of any European sites, when considered in combination with other plans or projects.	

6. Conclusion

HRA is not required because there is no conceivable impact on any European sites. (As documented in section 2.1)		
HRA is not required because the whole of the plan or project is directly connected with or necessary to the management of one or more European sites, for the purposes of conserving the habitats or species for which the site(s) is/are designated, <u>and</u> the plan or project is not likely to have a significant effect on any other European sites. (As documented in section 2.2 and 2.3)		
This project is a renewal of a current permission which complies with NRW agreed criteria for ruling out likely significant effects of a renewal without conducting a project-specific LSE test. Therefore, it is considered not likely to have a significant effect on any European sites, either alone or in-combination with other plans or projects. (As documented in section 3.1 of this form)		
The plan or project has been screened for likelihood of significant effects and is considered not likely to have a significant effect on any European sites. (As documented in section 3.2 of this form, and section 5 if applicable)		
In light of the conclusions of an appropriate assessment it has been established that the plan or project will not adversely affect the integrity of any European sites, taking into account any conditions or restrictions as applicable, either alone or in-combination with other plans or projects. (As documented in section 4 of this form, and section 5 if applicable)		X
In light of the conclusions of the appropriate assessment, it has <u>not</u> been ascertained that the plan or project will not adversely affect the integrity of any European sites, as documented in section 4 of this form, and section 5 if applicable. Approval for the plan or project <u>cannot</u> be given unless either: - the plan or project specification, and/or the terms under which it might be approved, are modified so as to remove the risk of adverse effects, and a revised HRA is prepared, or - the plan or project (not being an SSSI consent*) satisfies the requirements for a derogation and a Derogation Notice is prepared and submitted for consideration by the appropriate authority, normally Welsh Ministers (*SSSI consents cannot be given as derogations)		
Signed:	S. Treby	
Name:	Stephen Treby	
Position	Senior Marine Licensing Officer	
Date:	17 April 2026	
Was this HRA conclusion an escalated decision? YES or NO		No

7. Consultation with the ANCB and how sections 2, 3, 4 and 5 of this HRA report (as applicable) take into account that advice.

Relevant section of the HRA report	Correspondence and/or meetings with the ANCB	Description of how the comments from the ANCB have been taken into account
3	Email dated 16 April 2026 (advice dated 13 April 2026)	NRW TE advised the scoping in of bottlenose dolphin and grey seal due to the mobile nature of these species and their functional linkage to sites. Both features were added to the assessment with LSE being ruled out.

8. Appendix - Supporting information

Appropriate nature conservation body (ANCB) response to an internal HRA consultation

This form should be completed by the team or individual providing the ANCB advice to the competent authority team

TO: Stephen Treby – Marine Licensing Team

FROM: Rhian Forrest, Marine Area and Management Team

SUBJECT: Habitats Regulations Assessment of Mona Offshore Wind Farm Array Area
Geotechnical Survey Band 3

Thank you for consulting Marine Area Advice and Management Team on the above. Our comments are as follows:

NRW (A) do not agree with the completeness of the HRA as is.

As per [NRW's position on the use of marine mammal management units for screening and assessment in habitats regulations assessments for special areas of conservation with marine mammal features](#), All marine mammal features have not been scoped in. We agree with the scoping in of harbour porpoise but do not agree with the lack of scoping in of bottlenose dolphin and grey seal due to the mobile nature of these species and their functional linkage to sites.

The evidence provided does not represent a full assessment taking account of all pathways and species. For completeness, we would expect all marine mammal features to be scoped into an assessment for the impact pathways of both injury and disturbance. We would expect this assessment to take place in the HRA. Once these have robustly been considered we would expect the HRA could conclude no adverse effect on site integrity for marine mammal features.

Signed: Rhian Forrest

Date: 13.04.26