



**Written Submission  
for the  
Royal Society for the Protection of Birds**

**Submitted for Deadline 5  
30 May 2025**

**Planning Act 2008 (as amended)**

**In the matter of:**

**Application by North Falls Offshore Wind Farm Limited for an Order  
Granting Development Consent for the North Falls Offshore Wind Farm**

**Planning Inspectorate Ref: EN010119  
RSPB Registration Identification Ref: 20051053**

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## 1. Introduction

1.1. This Written Submission contains the RSPB's comments on issues raised by the Applicant's and Natural England's Deadline 4 submissions. It covers the following:

- North Falls:
  - Comment on REP4-010 (HRA Annex 2B Lesser Black-backed Gull Compensation; Effects on Designated Sites (Rev 0))
- Natural England:
  - Comment on REP4-060 Appendix G4.1 to Natural England's Deadline 4 Submissions
  - Comment on REP4-061 Appendix G4.2 to Natural England's Deadline 4 Submissions;
  - Comment on REP4-063 Appendix G4.4 to Natural England's Deadline 4 Submissions;
  - Comment on REP4-064 Appendix H4.1 to Natural England's Deadline 4 Submissions;

## 2. RSPB comments on issues raised by the Applicant's Deadline 4 submissions

### *Comment on REP4-010:*

- 2.1. The RSPB welcomes the submission into the examination of REP4-010 (Habitats Regulations Assessment Annex 2B Lesser Black-backed Gull Compensation; Effects on Designated Sites). Within this, the Applicant states that Lantern Marshes is the preferred location for compensation, albeit with other options also being taken forward. We have made comments on the suitability of Lantern Marshes in our Written Submission (REP4-089).
- 2.2. In the event that Gedgrave Marshes is selected as the Applicant's preferred option, further assessment will be required including assessment similar to that presented at REP4-010. There are significant differences between the two sites and suggest that close consideration is given to the potential for recreational disturbance at Gedgrave Marshes, a factor which is somewhat less prominent at Lantern Marshes. We would welcome further information being presented to the Examination at the next deadline.
- 2.3. In both locations evidence of the Applicant's progress with securing the necessary landowner agreements would be valuable evidence for the Examining Authority and Interested Parties.

### 3. RSPB comments on issues raised by Natural England's Deadline 4 submissions

#### *Comment on REP4-060:*

- 3.1. The Applicant is currently exploring options for compensatory measures for Lesser Black-backed Gulls, which may involve project-led, collaborative or strategic measures. We question North Falls assertion regarding their relative contribution to collaborative measures in the event they select that route, and support NEs questioning of this contribution (see Table 1, Row 1).
- 3.2. We anticipate further submissions from the Applicant at Deadline 5 on this issue.

#### *Comment on REP4-061:*

- 3.3. We note NE's general support of these measures. In our Written Submission (REP4-089) we highlight the considerable uncertainty attached to the Applicant's proposed measures for compensating for effects on Guillemot and Razorbill.
- 3.4. We support NE's criticism of these measures (see Table 1, Rows 4, 5 and 6) and suggest that currently these are measures that cannot be given weight.

#### *Comment on REP4-063:*

- 3.5. NE raises the issue of the recent Secretary of State decision on the Rampion 2 Offshore Wind Farm and the implications for the North Falls project in respect of in-combination effects on Guillemot. The RSPB supports NE's position on this matter.
- 3.6. We are aware from correspondence with the Applicant that North Falls has accepted the need to provide compensatory measures for Guillemot in connection with in-combination effects on the Farne Islands SPA. We anticipate further submissions from the Applicant at a future deadline.

#### *Comment on REP4-064:*

- 3.7. Natural England highlight the requirements to understand the full environmental implications of progressing Gedgrave Marshes as a potential compensation site. The RSPB support the position taken by NE in regard of the necessity of further assessment including field surveys.
- 3.8. The RSPB has made comments on the general suitability of Gedgrave Marshes as a compensation site in our Deadline 4 submission, REP4-089 (section 6).