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25 August 2026

Dear ██████████

The Morecambe Offshore Windfarm Generation Assets Order 2025

Lesser Black-Backed Gull Plan of Work and Compensation Implementation and Monitoring Plan under Paragraphs 4, 5, and 6 of Part 1 of Schedule 7 to the Order

Introduction

1.1. The Morecambe Offshore Windfarm Generation Assets Order 2025 (“the Order”) provided development consent for the Morecambe Offshore Windfarm Generation Assets (“the Project”). The Order contains requirements that Flotation Energy (“the undertaker”) must comply with before commencing the authorised development as defined in the Order. These include requirements in relation to lesser black-backed gull (“LBBG”).

1.2. Paragraphs 4, 5, and 6 of Part 1 of Schedule 7 (compensation measures) to the Order state that:

“4. Where the undertaker elects to submit a final lesser black-backed gull CIMP under paragraph 2(b) the authorised development may not be commenced until a plan for the work of the Lesser Black-Backed Gull Compensation Steering Group (“LBBGCSG”) has been submitted to and approved by the Secretary of State. Such a plan must include—

- (a) the identity of, or the arrangements for establishment of, the LBBGCSG;*
- (b) its terms of reference;*
- (c) details of its membership which shall (as a minimum) include the relevant planning authority, the relevant statutory nature conservation body and, where appropriate, the MMO as core members and the Royal Society for the Protection of Birds as an advisory member;*
- (d) details of the proposed schedule of meetings, reporting and review periods;*
- (e) the dispute resolution mechanism and confidentiality provisions; and*

(f) a schedule of preparation and delivery for the work of the LBBGCSG.

5. Following consultation with the LBBGCSG the final lesser black-backed gull CIMP, if required, must be submitted to the Secretary of State for approval, in consultation with the relevant statutory nature conservation body and, where appropriate, the MMO or the relevant local planning authority.

6. The final lesser black-backed gull CIMP, if required, must be based on the strategy for lesser black-backed gull compensation set out in the outline compensation implementation and monitoring plan and must include—

- (a) details of the location(s) where the lesser black-backed gull compensation measure will be delivered;*
- (b) details of how any necessary land access rights, licences and approvals have been or will be obtained;*
- (c) an implementation timetable for delivery of the lesser black-backed gull compensation measure; (d) a record of LBBGCSG consultations;*
- (e) details of the proposed ongoing monitoring and reporting on the effectiveness of the lesser black-backed gull compensation measure, including—*
 - (i) survey methods;*
 - (ii) success criteria;*
 - (iii) adaptive management measures;*
 - (iv) timescales for the monitoring and monitoring reports to be delivered;*
- and*
- (v) details of the mechanism to determine the need for any alternative compensation measures or implementation of adaptive management measures (or both)."*

1.3. On 27 April 2026, the undertaker submitted a request for the approval of the plan for the work of the LBBG Compensation Steering Group ("the Plan of Work"). A Compensation Implementation and Monitoring Plan ("CIMP"), inclusive of habitat management measures, for the Morecambe Bay and Duddon Estuary Special Protection Area ("MBDE SPA") and Ribble and Alt Estuaries Special Protection Area ("RAE SPA"), was also submitted for approval as required by paragraphs 4, 5, and 6 of Part 1 of Schedule 7 to the Order. The documents provided included the LBBGCSG Plan of Works, the full LBBG CIMP, and the LBBGCSG meeting minutes.

1.4. The Secretary of State notes that in 2025, prior to the grant of development consent (01 December 2025) and the approval of the outline LBBG CIMP, the undertaker commenced compensation measures for LBBG. This was to enable sufficient time (four years) for breeding-age birds to be recruited into the population before the commencement of the Project's operations. The supporting documents provided with this application summarise the works undertaken to date in this regard, along with the proposed future works. The Secretary of State further notes that strong support was expressed for the proposed compensation measures by stakeholders during the examination of the application for consent, including the Kenneth Allsop Memorial Trust ("KAMT") and Natural England ("NE"), which provided additional assurance to the undertaker in progressing the compensation measures ahead of the grant of Development Consent.

Representations

- 2.1. On 5 May 2026, the Secretary of State invited comments from NE, the Marine Management Organisation (“the MMO”), and North Somerset Council. The deadline for response was 23:59 on 02 June 2026.
- 2.2. The MMO responded on 27 May 2026 deferring to NE to advise on matters relating to the LBBG CIMP.
- 2.3. NE and North Somerset Council did not respond to the request for comment from the Secretary of State.
- 2.4. The Secretary of State notes that the undertaker consulted the LBBGCSG on multiple occasions during 2025 and 2026 in relation to the LBBG CIMP and no points of disagreement with the overall approach were identified.
- 2.5. The Secretary of State further notes that a draft of the LBBG CIMP was circulated to NE which provided minor methodological comments on 6 March 2026. The undertaker has subsequently incorporated those comments into the final version of the LBBG CIMP submitted for approval and has agreed to implement the updated measures set out therein.
- 2.6. The Secretary of State notes that the undertaker commenced the implementation of compensation measures in 2025, with the support of stakeholders, including NE, and the LBBGCSG. Overall, she considers that she has sufficient information to inform her decision on this application for approval.

The Secretary of State’s consideration of the Plan of Work

- 3.1. The Secretary of State has considered the details provided by the undertaker in respect of the requirements related to the approval request for the Plan of Work. The Secretary of State is satisfied that the approval request and the supporting document LBBGCSG Plan of Work dated 27 January 2026, provides the information required by Paragraph 4 of Part 1 of Schedule 7, to the Order.
- 3.2. The Secretary of State has considered the documents provided and **approves** the Plan of Work in accordance with requirements under paragraphs 4 of Part 1 of Schedule 7 to the Order.

The Secretary of State’s consideration of the LBBG CIMP

- 4.1. The Secretary of State has considered the LBBG CIMP and LBBGCSG comments provided by the undertaker in respect of the requirements related to Paragraphs 5 and 6 of Part 1 of Schedule 7 to the Order and the representations received.
- 4.2. The Secretary of State is satisfied that the LBBG CIMP Approval Request and the enclosed LBBG CIMP and LBBGCSG representations provides the necessary information and complies with the requirements of paragraphs 5 and 6 of Part 1 of Schedule 7 to the Order.
- 4.3. The Secretary of State **approves** the LBBG CIMP in accordance with requirements under paragraphs 5 and 6 of Part 1 of Schedule 7 to the Order.

Yours sincerely,

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Environmental Manager

Department for Energy Security & Net Zero