



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

**Submitted for Deadline 3
22 January 2025**

Planning Act 2008 (as amended)

**In the matter of:
Application by Morecambe Offshore Wind Limited for an Order
Granting Development Consent for the Morecambe Offshore Wind Farm**

**Planning Inspectorate Ref: EN010121
RSPB Registration Identification Ref: 20049971**

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1. Introduction

- 1.1. This submission sets out the RSPB's responses to the Applicant's submissions at Deadline 1 in respect of compensation measures.
- 1.2. Due to ongoing resource constraints, the RSPB has been unable to review fully the Applicant's updated documents in respect of offshore ornithology matters and will submit its comments on these at the next deadline.

2. Compensation measures

- 2.1. The RSPB has reviewed the Applicant's submissions at Deadline 1 which relate to the potential compensation measures for LBBG (REP1-093). The RSPB welcomes the updates on the different compensation options being considered and the progress with each. We also refer to our relevant representation which set out our general approach to compensation measures and the Applicant's LBBG compensation measures (RR-073).
- 2.2. The RSPB has noted that in addition to the LBBG compensation measures, the Applicant is separately developing potential compensation measures for Red-throated Divers should these be required (section 1.2.2, REP1-093). This is in light of Natural England's responses in respect of the potential impacts of the Morecambe offshore wind farm on the wintering Red-throated Divers of the Liverpool Bay SPA. The RSPB will review the Applicant's submission on any potential compensation measures for this species when it becomes available.
- 2.3. The following comments relate to the Applicant's updates in respect of:
 - Steep Holm; and
 - Banks Marsh (megafence).
- 2.4. The RSPB has noted that the Lagoon complex at South Walney has been retained as a further option if required. In this context, it would be helpful to understand when the Applicant anticipates it will be in a position to indicate a clear preference as to which of the three options it has under consideration it intends to take forward.
- 2.5. The RSPB will continue discussions with the Applicant in relation to specific compensation objectives for LBBG and further details on the proposed compensation measures to assess their suitability.
- 2.6. A key step will be to agree the range of predicted impacts to be compensated for (based on the preferred parameters of the Applicant, NE and the RSPB) and to translate these into compensation objectives for LBBG compensation. Those objectives must specifically address the requirement to recruit sufficient breeding adults into the LBBG National Site Network to compensate for the agreed impacts.

Steep Holm

- 2.7. The RSPB welcomes the updates set out in sections 3.1.4 and 3.3, which summarise progress with stakeholder engagement, land agreements, habitat management methodology and trials, consents and delivery programme.
- 2.8. In relation to the RSPB's concerns set out in its Relevant Representation (RR- 073), the RSPB would welcome further information from the Applicant in respect of the following:
 - The current understanding of typical breeding density of LBBG on Steep Holm;
 - The implications of this typical breeding density for the area of vegetation requiring clearance, based on the number of breeding pairs required. The latter will comprise a range based on the preferred parameters of the Applicant, NE and the RSPB.

- The Applicant’s methodology for scrub clearance on Steep Holm, including an indicative map of the areas identified as suitable for scrub clearance and the area in hectares of each (paragraph 68, REP1-093).
- 2.9. This information will help understand the potential scale of compensation available at Steep Holm, based on local breeding densities, and the practicalities of its delivery and ongoing maintenance.

Banks Marsh (megafence)

- 2.10. The RSPB welcomes the updates set out in sections 3.1.3 and 3.2, which summarise progress with stakeholder engagement, land agreements, design, consents and delivery.
- 2.11. The RSPB is content that the fence design itself will be effective in meeting its ecological objectives of excluding mammalian predators from the areas of Banks Marsh and Hesketh Out Marsh. Based on the RSPB’s experience, both at Hesketh Out Marsh and elsewhere, implementation of this design of fencing should result in improved breeding success of ground nesting birds where mammalian predation is known to be factor affecting breeding success, including the Banks Marsh LBBG colony.
- 2.12. We note that any necessary consents and permits will be obtained by Natural England and RSPB (paragraph 28, REP1-093), as appropriate.
- 2.13. Finally, the RSPB notes that funding discussions involve a number of parties (paragraph 25, REP1-093) and that discussions are ongoing. The RSPB would welcome an update on progression with those discussions, including the role and potential contributions of the other parties.