THE PLANNING ACT 2008

THE INFRASTRUCTURE PLANNING (EXAMINATION PROCEDURE) RULES 2010

Morecambe Offshore Wind Farm: Generation Assets

Appendix B8 to Natural England's Deadline 3 Submission

Natural England's comments on Offshore Ornithology

For:

The construction and operation of the Morecambe Generation Offshore Wind Farm located approximately 30 km off the Northwest English Coast in the Irish Sea.

Planning Inspectorate Reference EN010121

22 January 2025

1. Major/Complex comments

In formulating these comments, the following documents have been considered:

- [REP1_080] 9.22 Offshore Ornithology Technical Note 1 (EIA)
- [REP1_081] 9.23 Offshore Ornithology Technical Note 2 (HRA)
- [REP2_023] 6.9.1 Outline Vessel Traffic Management Plan - Revision 02 (Volume 6)

1.1. Summary

The Applicant has submitted updated cumulative and in-combination assessments including impact values for historical projects for which data were not previously available, derived largely from those calculated by RPS for Mona Offshore Wind Project (RPS, 2024). We are satisfied that the presentation of these updated figures resolves the methodological issues we had with the assessment and consider that we are now able to reach a position regarding the assessment's conclusions.

We advise that significant adverse impacts can now be ruled out for guillemot and Manx shearwater due to cumulative displacement impacts, and for herring gull, lesser black-backed gull and little gull due to cumulative collision impacts at an EIA scale.

We continue to advise that significant adverse effects on the UK western waters and Channel population of great black-backed gull due to cumulative collision risk cannot be ruled out at EIA scale. As stated in our Deadline 2 submission ([REP2-037] Appendix B4), we welcome the additional analysis presented by the Applicant regarding the effectiveness of increasing the proposed air gap as a possible mitigation measure, and we acknowledge that in this instance, it is unlikely that this would made a significant difference.

For HRA, we advise that adverse effects on site integrity (AEOI) cannot be ruled out for the lesser black-backed gull feature of Morecambe Bay and Duddon Estuary SPA and Ribble and Alt Estuary SPA due to in-combination collision risk impacts. While we acknowledge that the assessed contribution of the Project alone to these impacts is relatively minor, we consider that the collision risk figures presented are likely to be an underestimate of the levels expected in future years, and given that the lesser black-backed gull population at both these sites is currently well below the target level in the conservation objectives. Therefore, we advise that it is imperative that further deterioration from current levels is avoided. As with great black-backed gull at EIA scale, we accept the Applicant's analysis that increasing the air gap would not make a significant difference in this instance. We have been working with the Applicant on a proposed derogations case and we are confident that this will be capable of delivering adequate compensation for these impacts if required. We will include further detail on the rationale for our integrity judgements once the updated in-combination assessment is incorporated into the RIAA.

We are broadly in agreement with the Applicant regarding impacts on the non-breeding little gull feature of Liverpool Bay SPA and we advise that AEOI due to in-combination collision impacts can be ruled out due to uncertainties around the SPA population size, the wider population's size and movements and the difficulty in apportioning impacts to the SPA.

For avoidance of doubt and for audit trial purposes in relation to ornithological impacts, we also reiterate that we continue to advise that AEOI on the red-throated diver feature of Liverpool Bay cannot be ruled out due to displacement impacts from the Project alone, affecting the distribution of the feature within the SPA.

We support the inclusion of best practice measures for reducing impact to red-throated diver and common scoter in Liverpool Bay SPA. We advise that these measures must also be applied within a buffer of 2k from the SPA boundary. We also advise that further information is required to understand the potential magnitude of disturbance from vessel traffic and therefore to be able to advise on whether the broad measures outlined in the VTMP will be sufficient, or if more concrete commitments around seasonal restrictions and routing will be required (issue RI_B31).

While we acknowledge/highlight that no further assessment or updates are necessary for several issues, we draw the ExA attention to the fact that there remains an unresolved amber RAG status for some issues. This is due to the need for the updated assessments to be reflected within the ES chapter and assessments reports in order for NE to consider them to be resolved and sufficiently secured to be taken forward in the post consent phases.

1.2. Detailed comments - Tabular

Table 1: Natural England's Advice On: Offshore Ornithology

Document reviewed: 9.22 Offshore Ornithology Technical Note 1 (EIA); 9.23 Offshore Ornithology Technical Note 2 (HRA)					
NE Ref	**Section**	**Key Concern and/or Update**	**Natural England's Advice to Resolve Issue**	**RAG**	**R&I log point/topic**

1	3.1	In addition to the Applicant's submissions, we have reviewed the Offshore Ornithology Cumulative Effects Assessment (CEA) and In-combination Gap-filling Historical Projects Results (RPS, 2024) document submitted by Mona Offshore Wind Project. This is referenced by the Applicant as the source for the gap-filled impact estimates for historical projects. We welcome co-operation between the projects in sharing the figures. We do note the inconsistency in air gap parameter between that used for the Applicant's little gull collision risk modelling gap-fill for West of Duddon Sands and that in the Mona gap-fill method document. It is unclear from the Crown Estate database whether the parameter is relative to HAT, MSL or LAT, and we note that the Applicant has used the minimum possible air gap for the little gull analysis, which is the most precautionary approach. This raises the question of whether the air gap used by Mona Offshore Wind Project for the collision risk model gap-filling exercise for other species (which the Applicant has used) was appropriate. Using the Applicant's smaller air gap for collision risk estimates for other species at West of Duddon Sands OWF would result in collision estimates 25-50% greater for that project than what is presented, depending on each individual species' flight height distribution. Given that this is only one project in the cumulative assessment, however, this is unlikely to affect the conclusions of the assessment.	No further assessment is needed for the CEA. We are satisfied that the methodology used to produce the figures is robust and has been effectively carried out. The gap-filling exercise has allowed us to have increased confidence in the assessment.		RI_B8

	3.1.1	We welcome the Applicant's updated CEA for little gull collision impacts, and we thank the Applicant for sharing the log files with us.	We are satisfied with the approach taken for this assessment and therefore no further work is needed.		RI_B16
2	2.2.1.2	We note the gap-filled cumulative assessment led to an estimated range of displacement impacts on guillemot of 289-6746 individuals at EIA scale, giving a maximum potential impact that is equivalent to 4.23% of baseline mortality for the UK Western waters population. We welcome that the Applicant has carried out PVA to investigate the potential impacts of this additional mortality on the population. We note that with an impact value at the upper end of the range of those considered, the PVA predicted a 0.37% reduction in annual population growth rate and 12.53% reduction in final population size after 35 years compared with an unimpacted population.	Guillemot is listed as Amber on Birds of Conservation Concern 5a (BoCC5a) (Stanbury and others, 2024) and has recently been uplisted to 'Vulnerable' in the latest IUCN2a update (Stanbury and others, 2024). While there is some empirical evidence to support the displacement levels for auks, it is unknown what the likely mortality impacts of displacement are. We therefore consider it appropriate to consider a range of mortalities from 1-10%. However, on the basis that the projects that have been scoped into the cumulative assessment largely lie in areas of the UK western waters that represent low to medium levels of guillemot density during both the breeding (where relevant) and non-breeding seasons (Waggitt and others, 2019), it is assumed that areas of low/medium density will be less important/desirable feeding areas, and therefore mortality impacts of displacement from less desirable areas would be lower than displacement from optimal/important areas. Therefore, we do not expect mortality rates to be towards the top of the range considered. Based on the above, we advise that a significant adverse impact to guillemot from cumulative operational displacement (plus underwater collision) can be ruled out at an EIA scale.		RI_B14
3	94	We agree with the Applicant's assessment that EIA-scale adverse effects can be ruled out for displacement (plus underwater collision) impacts on Manx shearwater, on the basis that the predicted mortality for all impact scenarios	No further assessment is needed regarding Manx shearwater.		

		considered is below 1% of the baseline mortality figure.			
	96	We agree with the Applicant's assessment that EIA-scale adverse effects can be ruled out for collision impacts on herring gull, and lesser black-backed gull on the basis that the predicted mortality is below 1% of the baseline mortality figure.	No further assessment is needed regarding EIA level impacts to herring gull and lesser black-backed gull.		RI_B18, RI_B19
	105	We welcome the Applicant's updated PVA for great black-backed gull following the provision of updated CEA figures. We note that the annual population growth rate is predicted to decrease by 0.47% and the final population size by 15.52% after 35 years compared to an unimpacted scenario. We welcome that the Applicant has provided scenarios with and without the Project's impact to add context to the scale of the Project's contribution, which is relatively minor.	No further PVA updates are needed for this species. We agree with the Applicant's assessment that a moderate adverse effect on great black-backed gull is predicted due to the cumulative collision risk impacts of the Project and other existing and proposed offshore wind projects in the region. The standard mitigation practice for reducing collision risk is to increase the air gap between the turbine blades and the sea surface. However, as noted in our previous comments, the Applicant has presented an analysis of the effect of increasing the air gap in this instance, and we are satisfied that it would not make a significant difference to the overall cumulative effect.		RI_B21
	110	We are now satisfied that our concerns around the CEA for little gull have been addressed. Whilst taking note of the lack of evidence that exists regarding this species' population, movement patterns and demographics, we advise that significant adverse effects at EIA scale due to cumulative collision risk can be ruled out for this species	No further assessment is needed regarding little gull.		RI_B11
9.23 Offshore Ornithology Technical Note 3 (HRA)					
	3.1.1	We welcome the updated in-combination assessment the Applicant has provided. We are satisfied that the methodology is robust and has	No further assessment is needed.		RI_B8

		been effectively carried out. The updated figures allow us to have greater confidence in the assessment.			
	3.1.1.2	We note that the Applicant has partly followed our recommended method for improved proxy apportioning values. In our [PREVIOUS COMMENTS], we noted that the Applicant had used the Project's apportioning values as a proxy for apportioning impacts from multiple wind farms to Morecambe Bay and Duddon Estuary (MBDE) SPA. As apportioning rates are heavily distance-dependent and many of the wind farms are significantly closer to MBDE than the Project, we advised that this was likely to underestimate impacts apportioned to the SPA, and recommended calculating a more appropriate proxy. Rather than calculating a new value using the NatureScot method, the Applicant has instead applied a distance correction factor to the Project's apportioning rate to account for the difference in distance. This correction factor is based on the calculations used in the NatureScot method and the result was a higher breeding season apportioning rate.	We consider the Applicant's apportioning method to be an acceptable compromise in the context of the levels of impact predicted. No further assessment is needed.		RI_B27
	3.1.2.3	We welcome that the Applicant has carried out PVA to investigate the effect of the updated impact figures on the MBDE SPA lesser black-backed gull population. We note that the PVA predicted a 0.90% reduction in annual population growth rate and a 27.75% reduction in annual population size compared to an unimpacted scenario after 35 years, when considering in-combination total. We consider this level of	The colony at South Walney in MBDE SPA is currently in a period of gradual recovery, following the installation of a predator exclusion fence after the colony had collapsed and was failing to produce any chicks in the mid-2010s. It is therefore still in a vulnerable state, with a most recent population count of 1,724 breeding individuals (862 pairs). The site's conservation objectives include a breeding population attribute target to restore the population to 20,000 breeding individuals (10,000 pairs).		RI_B27, RI_B30, RI_B36

		impact to run counter to the site's conservation objectives. We welcome that the Applicant has run PVA for two scenarios, one with and one without the Project's impacts, to provide context to the scale of the Project's impacts.	We consider that the apportioned impact value of 0.33 is likely to be an underestimate of the potential impacts resulting from project once it is constructed. The Project's baseline surveys were carried out during the first two years of the colony's recovery following the installation of the predator exclusion fence in March 2021. The number of apparently occupied nests was significantly lower in those years than in the years since (Dalrymple, 2023; JNCC, 2025). As lesser black-backed gulls are known to forage more offshore when provisioning chicks (Isaksson and others, 2016)), and given the colony's current trajectory, it is reasonable to assume that more individuals will be using the Project area in future years than were observed in the baseline surveys, and therefore an increased number will be at risk of collision. We therefore consider that adverse effects on site integrity due to collision risk of the Project in-combination with other OWF projects cannot be ruled out for this feature of MBDE SPA.		
	3.1.3.2	We welcome that the Applicant has carried out PVA to investigate the effect of the updated impact figures on the Ribble and Alt Estuaries (RAE) SPA lesser black-backed gull population. We note that the PVA predicted a 0.54% reduction in annual population growth rate and a 17.83% reduction in annual population size compared to an unimpacted scenario after 35 years, when considering the in-combination total. We consider this level of impact to run counter to the site's conservation objectives. We welcome that the Applicant has run PVA for two scenarios, one with and one without the Project's impacts, to provide context to the scale of the Project's impacts.	The most recent count of breeding lesser black-backed gull at RAE SPA was 4,638 individuals (2,319 pairs). This is well below the site's breeding population attribute target of maintaining the population at 8,097 pairs. It is therefore imperative that any further deterioration is prevented. We therefore advise that AEOI cannot be ruled out for the lesser black-backed gull feature of RAE SPA due to the in-combination collision risk of the Project in-combination with other projects. We have been working with the Applicant on the development of a derogations case, which is well progressed and is more than capable of delivering compensation for the Project's impacts on both MBDE and RAE SPAs.		RI_B38

	3.2	We thank the Applicant for providing the log files for the little gull CRM, allowing us to resolve our concerns around the methodology. We are broadly in agreement with the reasoning the Applicant has set out around the potential impact on little gull. This is an evidence-poor species, making it difficult to draw clear conclusions about potential impacts. It is likely that the size of the Liverpool Bay SPA population is underestimated, and there is also likely to be a significant transitory population moving through the Irish Sea, which the individuals observed during the project surveys may belong to, rather than the wintering SPA population. On this basis, we advise that an adverse effect on site integrity can be ruled out for collision impacts on the little gull feature of Liverpool Bay SPA, both alone and in-combination with other projects.	No further assessment is needed. We are satisfied that the in-combination assessment of collision risk for this species has been carried out appropriately.		RI_B11, RI_B35

3. References

DALRYMPLE, S.A. 2023. Predator exclusion fencing improves productivity at a mixed colony of Herring Gulls Larus argentatus, Lesser Black-backed Gulls L. fuscus and Great Black-backed Gulls *L. marinus. Seabird,* 35, 18-29.

FURNESS, R.W. 2015. Non-breeding season populations of seabirds in UK waters: Population sizes for Biologically Defined Minimum Population Scales (BDMPS). Natural England Commissioned Report Number 164.

ISAKSSON, N., EVANS, T.J., SHAMOUN-BARANES, J. and ÅKESSON, S. 2016. Land or sea? Foraging area choice during breeding by an omnivorous gull. *Movement Ecology,* 4, 11.

JNCC. 2025. Seabird Monitoring Programme Online Database (Online Database). JNCC.

RPS. 2024. Mona Offshore Wind Project Offshore Ornithology Cumulative Effects Assessment and In-combination Gap-fulling Historical Projects Technical Note. 30 September 2024. Examination Library: REP3-044.

STANBURY, A.J., BURNS, F., AEBISCHER, N.J., BAKER, H., BALMER, D.E., BROWN, A., DUNN, T., LINDLEY, P., MURPHY, M., NOBLE, D.G. and OWENS, R. 2024. The status of the UK's breeding seabirds: an addendum to the fifth Birds of Conservation Concern in the United Kingdom, Channel Islands and Isle of Man and second IUCN Red List assessment of extinction risk for Great Britain. *British Birds*, 117, 471-487.

WAGGITT, J.J., EVANS, P.G., ANDRADE, J., BANKS, A.N., BOISSEAU, O., BOLTON, M., BRADBURY, G., BRERETON, T., CAMPHUYSEN, C.J., DURINCK, J. and FELCE, T. 2020. Distribution maps of cetacean and seabird populations in the North-East Atlantic. *Journal of Applied Ecology*, 57(2), 253-269.