



THE PLANNING ACT 2008

THE INFRASTRUCTURE PLANNING (EXAMINATION PROCEDURE) RULES  
2010

MORECAMBE GENERATION OFFSHORE WIND FARM

**Appendix B11 to Natural England's Deadline 5a Submission**

**Natural England's comments on Offshore Ornithology**

For:

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

Planning Inspectorate Reference EN010121

8<sup>th</sup> April 2025

## **Morecambe Deadline 5a Offshore Ornithology Specialist comments**

### **1. Minor comments**

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

- [REP5-015] 5.1.12 Chapter 12 Offshore Ornithology Rev\_03

**Table 1: Natural England's advice on: Offshore Ornithology**

<b>Document reviewed</b>	<b>Update made</b>	<b>Issue resolved?</b>
5.1.12 Chapter 12 Offshore Ornithology Rev_03	We note that the Applicant has updated Table 12.15. Natural England are now in agreement with the seasonal definitions used.	Yes
5.1.12 Chapter 12 Offshore Ornithology Rev_03	We note that the Applicant has updated table 12.48 to incorporate Natural England's recommended reference values. We are now satisfied with these.	Yes

## **2. Major/Complex comments**

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

- [REP5-015] 5.1.12 Chapter 12 Offshore Ornithology Rev\_03

### **2.1. Summary**

The Applicant has incorporated updates to the offshore ornithology assessment initially submitted in Technical Note 1 (EIA) at Deadline 1 into the Environmental Statement (ES). See Appendix B8 to Natural England's Deadline 3 submission [REP3-090] for our detailed comments on the Deadline 1 updates. In summary, the Applicant has incorporated Natural England's recommended reference values, made some minor corrections, and incorporated the updated cumulated effects assessment into the ES.

On the basis of the updated assessment, Natural England agrees with the Applicant's conclusions that significant adverse effect at an EIA scale can be ruled out for all offshore ornithological receptors with the exception of great black-backed gull, where we agree with the Applicant's assessment that significant adverse effect cannot be ruled out. In the Technical Note 1 (EIA), the Applicant presented an analysis of the potential to mitigate the impact of the Project on this species by increasing the air gap between the turbine blades and the sea surface, and concluded that the mitigation achieved would in this case be insignificant, which Natural England agrees with.

## 2.2. Detailed comments - Tabular

**Table 2: Natural England's Advice On: Offshore Ornithology**

Document reviewed: [REP5-015] 5.1.12 Chapter 12 Offshore Ornithology Rev_03			
NE Ref	Section	Key Concern and/or Update	Natural England's Advice to Resolve Issue
1	Table 12.17	<p>We note that this table has been updated and is now mostly correct except for the mortality rate for great black-backed gull, which should be 0.0969 rather than 0.093.</p> <p>We note that the correct GBBG mortality rate is used in Table 12.48.</p>	Ensure that the correct figures are incorporated from the Technical Note into the Environmental Statement.
2	12.423 – 12.432	The Applicant has incorporated the updated CEA and PVA for guillemot from the EIA technical note submitted at Deadline 1 into the ES Offshore Ornithology Chapter. Natural England are satisfied that significant adverse effect at the EIA scale can be ruled out for this species. See Appendix B8 to Natural England's Deadline 3 submission for Natural England's detailed comment on this assessment.	Resolved
3	12.452 – 12.454	The Applicant has incorporated the updated CEA for little gull from the EIA technical note submitted at Deadline 1 into the ES Offshore Ornithology Chapter. Natural England are satisfied that significant adverse effect at the EIA scale can be ruled out for this species.	Resolved
4	12.461 – 12.462	The Applicant has incorporated the updated CEA for herring gull from the EIA technical note submitted at Deadline 1 into the ES Offshore Ornithology Chapter. Natural England are satisfied that significant adverse effect at the EIA scale can be ruled out for this species.	Resolved
5	12.463 – 12.464	The Applicant has incorporated the updated CEA for lesser black-backed gull from the EIA technical note submitted at Deadline 1 into the ES Offshore Ornithology Chapter. Natural England are	Resolved

		satisfied that significant adverse effect at the EIA scale can be ruled out for this species.	
6		The updated CEAs do not include impacts from the Barrow and North Hoyle projects.	See NE response to ExQ1 1BEM46 [REP3-092]. Whilst it would be preferable to consider impacts from these projects in the CEA, we do not believe it will make a material difference to the outcome of this Examination.
7	12.465 – 12.467	The Applicant has incorporated the updated CEA and PVA for great black-backed gull from the EIA technical note submitted at Deadline 1 into the ES Offshore Ornithology Chapter. Natural England is in agreement with the Applicant that significant adverse effect at the EIA scale cannot be ruled out for this species.	<p>The Applicant has investigated the potential to mitigate the Project's impact on this species by increasing the air gap between the turbine blades and the sea surface and has demonstrated that the difference this would make is likely to be insignificant in this case. Natural England accept that the impact has been mitigated as far as possible.</p> <p>We note that some benefits to great black-backed gull <i>might</i> accrue at Steephholm if the Applicant delivers their compensatory measure for lesser black-backed gull there. While this species is not as inclined to breed gregariously with the other large gulls, it may still benefit from scrub clearance, especially if there is some feature such as a rock outcrop or similar to provide some shelter/structure rather than a completely exposed 'plateau' site.</p>
8	12.465	There is an error in the paragraph describing impacts on great black-backed gull. The paragraph states that the cumulative impacts would increase mortality by 0.71%. It appears that this has been calculated using the biogeographic population rather than the BDMPS. The increase in baseline mortality relative to the BDMPS population that the Applicant presented in the EIA Technical Note at Deadline 1 was 9.37%.	Ensure that the correct figures are incorporated from the Technical Note into the Environmental Statement.
9	12.466	In the absence of a focused UK ringing program on great black-backed gull, demographic rates are not well understood. The demographic rates are based on relatively old data, from outside the UK in some cases, and therefore are not considered particularly reliable. Caution must be used when considering the outputs of PVA, and the counterfactuals are generally considered	For information only

		<p>a more informative measure for assessing impacts than the predicted absolute population and population growth rate.</p> <p>A predicted annual population growth rate of 1.1279 is unrealistically high for a species which has seen significant declines on a national level between Seabird 2000 and Seabirds Count (Burnell and others, 2023). Within England, the population was relatively stable over the same period, although with severe impacts due to HPAI reported. In the 2024 addendum to Birds of Conservation Concern 5 (Stanbury and others, 2023), great black-backed gull was placed on the Red list and it is rated as Critically Endangered at the UK level.</p>	
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