



THE PLANNING ACT 2008

THE INFRASTRUCTURE PLANNING (EXAMINATION PROCEDURE) RULES
2010

Morecambe Offshore Wind Farm: Generation Assets

**Appendix B13 to Natural England's Deadline 6 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

15th April 2025

Morecambe Generation Deadline 6 Offshore Ornithology Specialist comments

1. Minor comments

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

- [REP5a-047] 9.37.1 Habitats Regulations Assessment Without Prejudice Derogation Case – Red-Throated Diver at Liverpool Bay / Bar Lerpwl SPA
- [REP5a-049] 9.38.1 Outline Compensation Implementation and Monitoring Plan – Red-throated diver
- [REP5a-012] 4.11.1 Habitats Regulations Assessment Without Prejudice Derogation Case
- [REP5a-014] 4.11.1.1 Outline Compensation Implementation and Monitoring Plan

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

Document reviewed	Update made	Issue resolved?
[REP5a-047] 9.37.1 Habitats Regulations Assessment Without Prejudice Derogation Case – Red-Throated Diver at Liverpool Bay / Bar Lerpwl SPA	In the updated Without Prejudice Derogation Case document the Applicant maintains the position that there are no feasible alternative solutions and references The Applicant's Responses to ExQ3 Appendix A: Response to 3GEN2 and 3GEN3 (Document Reference 9.61.1) to support this. Natural England's position regarding alternative turbine arrangements as a mitigation measure is set out in Appendix L – Natural England's Response to RIES Deadline 6, Table 1, ref. RIESQ35. Natural England considers that there are alternative buffer scenarios which would allow AEOI to be ruled out if secured.	Progressed
[REP5a-049] 9.38.1 Outline Compensation Implementation and Monitoring Plan – Red-throated diver	The Applicant has updated the Red-throated diver Compensation Implementation and Monitoring Plan (CIMP), adding significantly more detail, which Natural England welcomes. There are still aspects of the CIMP that require development, so further work from the Applicant as regards specific locations and interventions to ensure that the measures can be secured must be undertaken as a priority.	Progressed
[REP5a-012] 4.11.1 Habitats Regulations Assessment Without Prejudice Derogation Case	The Applicant has not yet had the opportunity to incorporate Natural England's advice provided at D5a regarding the appropriate compensation quantum into this document, and the target level of compensation set out in this document is therefore not agreed with NE. However, the document references the updated Lesser black-backed gull (LBBG) CIMP, in which it is proposed that an area of 1.08ha of scrub will be cleared on Steep Holm, which we consider to be more than sufficient to compensate for the Project's impacts.	Progressed

<p>[REP5a-014] 4.11.1.1 Outline Compensation Implementation and Monitoring Plan</p>	<p>The Applicant has updated the LBBG CIMP, adding significant detail regarding the delivery of the measure. Natural England welcomes this and considers that the scale of compensation is more than adequate, and that the methods for delivery and monitoring of the measure are broadly appropriate. We will continue to engage with the Applicant post-consent regarding the delivery of this measure.</p>	<p>Resolved</p>
<p>[REP5a-014] 4.11.1.1 Outline Compensation Implementation and Monitoring Plan</p>	<p>Natural England notes that the Applicant has specified that the aim will be to carry out a minimum of 3-4 visits (depending on access) to the focal nests involved in the study between April and August. We consider that a minimum of 4 visits will be necessary to quantify both hatching (2 visits) and fledging success (2 visits), highlighting that all such visits will also provide opportunities for visual monitoring and recording of previously ringed chicks to evidence recruitment into the natal colony.</p>	<p>Progressed.</p>