



THE PLANNING ACT 2008

THE INFRASTRUCTURE PLANNING (EXAMINATION PROCEDURE) RULES
2010

Morecambe Offshore Wind Farm: Generation Assets

**Appendix I4 to Natural England's Deadline 6 submission.
Natural England's answers to the Examining Authority's request for further
information Deadline 6**

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

1. Natural England's answers to the Examining Authority's request for further information

Request	Natural England's response
<p>R17.2.1 – To the applicant and NE</p> <p>On 27 March 2025 the High Court issued its decision in <i>New Forest National Park Authority v SoSHLG and another</i> [2025] EWHC 726 (Admin). This considered the implications to the changes to the National Parks and Access to the Countryside Act 1949, and Countryside and Rights of Way Act 2000 from section 245 of the Levelling Up and Regeneration Act 2023 in ground 2 of the grounds of appeal.</p> <p>The applicant and NE are asked for any comments that they may wish to give in light of this judgment in relation to matters pertinent to this application in respect of protected landscapes.</p>	<p>Natural England does not have any comments to make in light of this judgement that we consider pertinent to this application.</p>
<p>R17.2.6 – To NE</p> <p>In NE's Deadline 5a submission 'Appendix B12 – Comments on Lesser Black Backed Gull Compensation Quantum' [REP5a-070] it has set out a calculation as to the area of scrub clearance at Steep Holm. The derivations of all the numerators used are set out with the exception of that for philopatry.</p> <p>NE is asked to:</p> <ul style="list-style-type: none"> a) further justify the use of philopatry within the calculation, given that NE says the calculations "<i>may also need to take account</i>" of this concept b) set out how the numerator has been derived c) in responding, please signpost to any guidance requiring consideration of philopatry when compensating across the National Site Network 	<ul style="list-style-type: none"> a) The appropriate compensation calculations, including whether to factor in philopatry/natal dispersal, should be developed on a site-by-site and measure-by-measure basis. In this instance it is important to account for philopatry in the calculation because Steep Holm is outside of the NSN of sites classified for lesser black-backed gull. This means that philopatric birds that return to Steep Holm will not be within the NSN and thus cannot be considered as contributing to the compensation quantum delivered. However, this measure will contribute to protection of the coherence of the NSN by way of natal dispersal of birds from Steep Holm out into the NSN. To appropriately scale the requirement, it is therefore necessary to factor in the likely philopatry rate. b) The numerator for the philopatry step of the calculation is the number of fledglings required based upon the total impact value for both SPAs and modified by the survival rate each year until breeding age. The denominator is the natal dispersal rate for LBBG given in Horsewill and Robinson (2015): this is a representation of the

	<p>proportion of fledglings that would <u>not</u> return to their natal colony (Steep Holm in this case) and could therefore contribute to the compensation quantum required. The philopatry rate is the inverse of the natal dispersal rate.</p> <p>c)There is no guidance specific to the requirement to consider philopatry when protecting the coherence of the NSN through off-site compensatory measures. Rather, the rate of philopatry is one of many relevant demographic factors that must be considered for a robust assessment of the impact of changes to the number of nesting pairs and/or the productivity at a compensation site, and therefore the number of birds that the site might be expected to 'export' into the wider population and the NSN.</p>
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