



**Written Submission**  
**for the**  
**Royal Society for the Protection of Birds**  
**Response to the Examining Authority's Second Written Questions**  
**(ExQ2)**

**Submitted for Deadline 5**  
**16 January 2025**

**Planning Act 2008 (as amended)**

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

**Planning Inspectorate Ref: EN010136**  
**RSPB Registration Identification Ref: 20049575**

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## 1. Introduction

- 1.1. The RSPB's responses to the Examining Authority's Second Written Questions (ExQ2) are set out in the table below.

## Responses to the Examining Authority's Second Written Questions

ExQ2	Question to:	Question	RSPB response
<b>MARINE ORNITHOLOGY</b>			
MO2.3	Natural England NRW JNCC  RSPB	<b>Methodology for Ornithological Assessments</b> The SNCBs and RSPB are asked to confirm at D5 a list of the agreed and not agreed methodological issues, with reference to the summary data as referred to above and the range of clarification notes/errata submitted up to and including D4.	<p>The RSPB is conscious that its limited resources has impacted its ability to review the Applicant's submissions to the examination and to produce an updated SOCG with the Applicant. This remains the case.</p> <p>The RSPB notes the Examining Authority's request for a list of agreed and not agreed methodological issues, with reference to the summary data (referred to in MO2.1) which is to be provided to Natural England.</p> <p>Therefore, the RSPB proposes that it will review all relevant submissions including the technical clarification notes already submitted and the summary data to be submitted by the Applicant at Deadline 5 and commit to respond at Deadline 6 (i) to question MO2.3 and (ii) submit an updated SOCG following further discussions with the Applicant.</p>
MO2.5	RSPB	<b>Ornithology clarification notes and CEA/In-Combination Assessment Review</b> The Deadline 1 response [REP1-058] refers to your ongoing review of the technical clarification notes, and that your position will be updated through the SoCG and further written submissions to the Examination. The SoCG [REP1-039] contains limited agreement and notes a number of matters which are	<p>The RSPB does not agree that the implications on assessment of the outbreak have been adequately assessed for the reasons detailed in our ExQ1 response (REP3-052).</p> <p>Subsequent to these, the RSPB request that the following consequences of the HPAI outbreak are</p>

ExQ2	Question to:	Question	RSPB response
		<p>an ongoing point of discussion, with one matter (assessment methodology RSPB OO.6) noted as not agreed. The RSPB response to ExQ1 MO 1.8 [REP3-052] does not specifically note whether any additional information or assessment is sought from the Applicant regarding HPAI effects as set out in part v) of the question.</p> <p>The Applicant has submitted a number of additional notes since the SoCG was produced on 3 October. In the absence of an updated version of the SoCG to date, the RSPB is asked to submit a response to the additional clarification notes, CEA Review and the Applicants comments on its response to ExQ1 MO 1.8 [REP4-007 and REP4-008].</p>	<p>explicitly considered in the Applicant's subsequent submissions to the examination:</p> <ul style="list-style-type: none"> <li>• Consideration of how the HPAI outbreak will influence the representativeness of the baseline characterisation. This should include the direct influence of population size and through changes in space use;</li> <li>• Alterations of the extent of interactions with wind farms, potentially related to physiological changes, and in the lethal and sub-lethal consequences of those interactions; and</li> <li>• Consequences in changes in the robustness of protected population to additional mortality arising through the presence of wind farms.</li> </ul> <p>The RSPB is happy to provide further comments following the Applicant addressing these points in additional submissions to the Examining Authority.</p>