From:	Malcolm Fraser
To:	Morecambe Offshore Wind Project
Subject:	NatureScot comments on Morecambe Offshore Windfarm Generation Assets
Date:	12 December 2024 10:49:09

Planning Inspectorate –

We previously offered comments on the proposed Morecambe Offshore Wind Farm directly to the applicant. We now offer these comments directly to you for consideration in the Examination process.

We do emphasise that, due to high levels of casework demand relating to marine energy proposals in Scottish seas, we are unable to commit to formal engagement in the DCO consenting process.

However, we note that this project is undergoing Examination, and that the Report on the Implications for European Sites (RIES) is to be considered on 25 March 2025. We note the assessment of impacts set out in the Report to Inform Appropriate Assessment (RIAA) and supporting documents, which includes an assessment of impacts upon Scottish designated sites.

We have reviewed the RIAA and recorded the predicted impacts on Scottish sites. We do this to inform our own future in-combination assessment of predicted and actual impacts on Scottish designated sites. We provide a summary of our own review here, which we hope is of assistance. Note that our review focusses solely on marine ornithological receptors.

NatureScot review – approach to assessment

Marine energy proposals in Scottish waters are expected to follow the approaches set out in NatureScot's suite of 11 Marine Ornithological Impact Assessment guidance notes, which are available here: https://www.nature.scot/professional-advice/planning-and-development/planning-and-development-advice/renewable-energy/marine-renewables/advice-marine-renewables-development

The approach used in the Morecambe assessment follows non-Scottish guidance and assessment methodologies, and therefore differs in key ways from the Scottish approach:

- The applicant has screened species using the maximum foraging range. NatureScot recommends the mean max + 1SD to be used to screen in connectivity in most cases.
- Distances between the development site and the SPAs are given 'as the crow flies'; we recommend by-sea distances to reflect biological realism, and where there is clear well-evidenced segregation of foraging behaviour based on tracking data, if appropriate.
- In Scotland, we are recommending screening for distributional responses for fulmar. Although this species have not previously been assessed in projects due to being a lower risk for both collision and displacement, they have now started to be included in some assessments particularly due to proximity to breeding colonies and

concerns with barrier effects.

NatureScot review – comments on the documentation

- The screening process seems inconsistent. For example, red-throated divers have been screened from Northern Isles SPAs but not for Rum SPA which is much closer to the development site, and the species is more likely to overlap with the development site in the non-breeding season (Furness, 2015).
- There were quite a few cases where typos occurred in the text. For example, paragraphs on razorbills containing sentences on guillemots.

NatureScot review – site-specific comments

Solway Firth SPA
We no longer support the use of SOSS-MAT (Wright et al., 2012) for migratory bird screening. Instead we recommend the recently published Offshore wind strategic review (2023) should be used for assessment of migratory waterbirds and WWT & MacArthur Green (2014) report should be used for seabirds. This is because the 2014 report used the Wright et al. 2012 report as "The starting point for defining the migration corridors of non-seabird species was the figures provided in the SOSS-05 report. These have been refined where possible and modified to reflect passage through Scottish waters."

Ailsa Craig SPA

Gannet
The applicant states that based on GPS tracking data (Wakefield et al., 2013) the proposed development overlaps with Ailsa Craig SPA gannets, and as gannets from different colonies do not overlap foraging ranges during the breeding season, it is assumed all breeding adults present originate from Ailsa Craig SPA.

Although the applicant has used a displacement value of 60-80% with 1% mortality, NatureScot recommends a displacement value of 70% with a mortality value of 1%-3%. Based on numbers presented in Table 8.54, the annual mortality range of Ailsa Craig SPA gannets would be 1-13 birds per annum. Using the maximum potential mortality value, there would be an annual increase in mortality of 0.24 percentage points and we would recommend a PVA. We recommend a species is taken forward for PVA when assessed effects exceed a change to the adult annual survival rate of 0.02 percentage point change. NatureScot, like RSPB, does not accept the 70% macro-avoidance rate for gannet in the breeding season and therefore we would view the additional mortality from collision to be higher than reported.

As a result, including the increase in mortality from collision, we would be **unable to conclude no AEoSI from the project alone.** However, we note that not all gannetries were included in the tracking studies. Of particular relevance are Scar Rocks and Ireland's Eye. As these sites were not included in the tracking study, we cannot disregard these sites and therefore cannot discount that some of the gannets seen in the study area would have originated from these colonies. **As such, we cannot agree that 100% of the gannets present in the DAS surveys in the breeding season originated from Ailsa Craig SPA and would require a recount of apportioning this species.**

Kittiwake

A mortality increase of 0.02% annually would trigger a PVA in Scotland, however, as this is not a Scottish development we accept the Natural England threshold of 1% increase in baseline mortality has been used in this assessment. It is noted that kittiwake are not assessed for displacement. According to NatureScot Guidance Note 8, kittiwake should have a displacement rate of 30%, with a mortality rate of between 1% and 3%. For our own records, we would like to understand the effects of the project on birds from Scottish SPAs and therefore would appreciate any further information that could be provided on displacement mortality.

Lesser Back Backed Gull -We Agree no Adverse Effects on Site Integrity (AEoSI)

Herring gull **-** Agree no AEoSI

Guillemot - Agree no AEoSI

Forth Islands SPA
Gannet - Agree no AEoSI
Puffin - Agree no AEoSI

North Colonsay and Western Cliffs SPA
Kittiwake - Agree no AEoSI
Guillemot - Agree no AEoSI

Treshnish Isles SPA
European storm petrel - Agree no AEoSI

Fowlsheugh SPA
Fulmar - Agree no AEoSI
Kittiwake - Agree no AEoSI

Rum SPA
Manx shearwater
We agree there is no AEoSI for Manx shearwater at Rum SPA. The assessment does not seem to take account of the recent review on the risk of collision and displacement in procellariforms and we draw attention to this.

These species are active nocturnally, and there is evidence to suggest they are sensitive to light attraction ("phototaxis"), which could render them especially vulnerable to negative impacts from offshore windfarms, for example, if attracted to the rotor-swept area by lights on the turbines that are required for aviation purposes. Low fecundity rates and a relatively protracted time to reach maturity (3–6 years) for these species, means seemingly small impacts on survival rates can have large impacts on population viability, making them particularly vulnerable to lethal impacts of wind farm development. The combination of large foraging ranges and very protracted breeding seasons means that birds will be exposed to risks from marine activities over a wider geographic area, and for a longer period of the year, than many other seabird species.

Canna and Sanday SPA
Guillemot - Agree no AEoSI

Buchan Ness to Collieston Coast SPA
Fulmar - Agree no AEoSI
Kittiwake - Agree no AEoSI

Mingulay and Berneray SPA
Fulmar - Agree no AEoSI
Guillemot - Agree no AEoSI
Razorbill - Agree no AEoSI

Troup, Pennan and Lion's Head SPA
Fulmar - Agree no AEoSI
Kittiwake - Agree no AEoSI

East Caithness Cliffs SPA
Fulmar - Agree no AEoSI
Kittiwake - Agree no AEoSI

Shiant Isles SPA
Fulmar - Agree no AEoSI
Guillemot - Agree no AEoSI
Razorbill - Agree no AEoSI
Puffin - Agree no AEoSI

Handa SPA
Fulmar - Agree no AEoSI
Great skua - Agree no AEoSI
Kittiwake - Agree no AEoSI
Guillemot - Agree no AEoSI
Razorbill - Agree no AEoSI

North Caithness Cliffs SPA
Fulmar - Agree no AEoSI
Kittiwake - Agree no AEoSI

St Kilda SPA
Fulmar - Agree no AEoSI
Manx shearwater - Agree no AEoSI
Leach's storm petrel - Agree no AEoSI
Great skua - Agree no AEoSI
Guillemot - Agree no AEoSI
Puffin - Agree no AEoSI
Gannet - Agree no AEoSI

Cape Wrath SPA
Fulmar - Agree no AEoSI
Kittiwake - Agree no AEoSI
Guillemot - Agree no AEoSI
Razorbill - Agree no AEoSI

Flannan Isles SPA
Fulmar - Agree no AEoSI

Leach's storm petrel - Agree no AEoSI
Guillemot - Agree no AEoSI
Puffin - Agree no AEoSI

Hoy SPA
Red-throated diver - Agree no AEoSI
Fulmar - Agree no AEoSI
Great skua - Agree no AEoSI

Copinsay SPA
Fulmar - Agree no AEoSI

Sule Skerry and Sule Stack SPA
Leach's storm petrel - Agree no AEoSI
Gannet - Agree no AEoSI
Guillemot - Agree no AEoSI
Puffin - Agree no AEoSI

Rousay SPA
Fulmar - Agree no AEoSI

North Rona and Sula Sgeir SPA
Fulmar - Agree no AEoSI
Leach's storm petrel - Agree no AEoSI
Gannet - Agree no AEoSI
Guillemot - Agree no AEoSI

Calf of Eday SPA
Fulmar - Agree no AEoSI

West Westray SPA
Fulmar - Agree no AEoSI
Kittiwake - Agree no AEoSI

Fair Isle SPA
Fulmar - Agree no AEoSI
Great skua - Agree no AEoSI

Sumburgh Head SPA
Fulmar - Agree no AEoSI

Foula SPA
Fulmar - Agree no AEoSI
Great skua - Agree no AEoSI
Red-throated diver - Agree no AEoSI
Puffin - Agree no AEoSI

Noss SPA
Fulmar - Agree no AEoSI
Great skua - Agree no AEoSI
Gannet - Agree no AEoSI

Rona's Hill – North Roe and Tingon SPA and Ramsar
Red-throated diver - Agree no AEoSI

Great skua - Agree no AEoSI

Fetlar SPA
Fulmar - Agree no AEoSI
Great skua - Agree no AEoSI

Hermaness, Saxa Vord and Valla Field SPA
Fulmar - Agree no AEoSI
Great skua - Agree no AEoSI
Gannet - Agree no AEoSI
Red-throated diver - Agree no AEoSI
Puffin - Agree no AEoSI

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