



**Summary of Relevant Representation
for the
Royal Society for the Protection of Birds**

**Submitted on 27 September 2024
for Deadline 1**

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. Summary

- 1.1. This document summarises the relevant representation of the RSPB on the following aspects of the Morgan offshore wind farm application:
 - Offshore ornithology impacts
 - Compensation measures.
- 1.2. The RSPB reserves the right to add to and/or amend its position in light of changes to or any new information submitted by the Applicant.

Offshore Ornithology Impacts - Summary of RSPB position

- 1.3. The RSPB's has significant methodological concerns regarding some of the impact assessments, primarily:
 - Manx Shearwater: baseline characterisation and potential impacts arising through collision.
 - Gannet: the application of a macro-avoidance correction factor to baseline densities for collision risk modelling.
 - Flight speeds used as parameters in collision risk modelling.
 - Methodology for assessment of cumulative/in-combination impact.
 - Ecosystem impacts.
 - A lack of consideration of impacts compounded by Highly Pathogenic Avian Influenza.
- 1.4. As a result of the methodological concerns, the RSPB considers that the impacts have not been adequately assessed and, as such consider Adverse Effect on Integrity (AEIOI) cannot be ruled out beyond reasonable scientific doubt for collision impacts arising through the project alone and in combination with other projects.

Project alone – RSPB AEIOI conclusions

- 1.5. We are unable to reach conclusions with regard to AEIOI on Manx Shearwater in relation to the following Special Protection Areas:
 - Irish Sea Front SPA.
 - Copeland Islands SPA.
 - Glannau Aberdaron ac Ynys Enlli/Aberdaron Coast and Bardsey Island SPA.
 - Skomer, Skokholm and the Seas off Pembrokeshire/Sgomer, Sgogwm a Moroedd Penfro SPA.
 - Rum SPA.
 - Isles of Scilly SPA.
 - St Kilda SPA.

Project in combination with other plans and projects – RSPB AEIOI conclusions

- 1.6. We conclude there will be an adverse effect on site integrity on the following features of the Isles of Scilly SPA:
 - The impact of collision mortality on the Great Black-backed Gull (GBBG) population.
- 1.7. AEIOI cannot be ruled out beyond reasonable scientific doubt for impacts arising through collision and distributional change arising through the project in combination with other

projects on a range of species/SPA combinations due to methodological concerns as to how historical data were incorporated into these.

Compensation measures

- 1.8. We have noted that the recently published Morecambe Offshore Wind Farm application documents explore the issue of in-combination impacts on, *inter alia*, the Herring Gull and Lesser Black-backed Gull (LBBG) features of the Morecambe Bay and Duddon Estuary SPA and the LBBG feature of the Ribble and Alt Estuaries SPA. They go on to consider, on a without prejudice basis, possible compensation measures in relation to LBBG for both SPAs. The RSPB will need to consider the Morecambe Offshore Wind Farm application documents in detail and what, if any implications, they may have for the Morgan Offshore Wind Farm.