



# Morven South Offshore Wind Array Project

Habitats Regulations Appraisal

**Volume 3, Annex 2.1: Compensation Stakeholder  
Consultation**

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# 1 Compensation Stakeholder Consultation log

**Table 1.1: Consultation log outputs**

Consultation title	Consultation date	Consultee	Consultation type	Issue(s) raised	Response to issue
Habitats Regulations Appraisal (HRA) Derogation Consultation - Identification of Predator Control Measures	06.06.2024	NatureScot; Marine Directorate – Licensing Operations Team (MD-LOT)	Virtual meeting	<p>The meeting on 06 June 2024 aimed to gather feedback from NatureScot and MD-LOT on the Applicant’s proposed approach and supporting report for identifying offshore island locations suitable for predator eradication as potential Habitats Regulations compensation. The discussion focused on scope, methodology, and any concerns.</p> <p>The Applicant shared its proposed approach and supporting report for identifying offshore island locations suitable for predator eradication as potential compensation under the Habitats Regulations.</p>	Identification of the offshore island selection process suitable for predator eradication is presented in Volume 3, Annex 2.3: Assessment of Offshore Islands Potentially Suitable for Predator Eradications Report of the HRA.

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HRA Derogation Consultation - Identification of Predator Control Measures	27.06.2024	NatureScot; MD-LOT	Email received	<p>Following the meeting on 06 June 2024 the Applicant sought stakeholder views on the feasibility and implications of rat eradication on selected islands, including Isle of Rum, and requested clarity on logistical, ecological, and monitoring considerations.</p> <ul style="list-style-type: none"> <li>NatureScot noted that while removing rats from the Isle of Rum could benefit seabird populations, the scale and rugged terrain of the island make eradication highly challenging and costly. They emphasised that rats are widespread, and traditional methods such as poisoning would pose risks to other species.</li> <li>NatureScot highlighted that puffin numbers are very low, with no recent records, and any link to rat predation remains inconclusive. NatureScot raised the need for robust planning, biosecurity, and post-eradication monitoring.</li> </ul>	Feasibility and implications of rat eradication on selected islands, including Isle of Rum, is presented in Volume 3, Annex 2.3: Assessment of Offshore Islands Potentially Suitable for Predator Eradications Report of the HRA, with further details about the island section in Volume 3, Chapter 2: Compensation and Evidence Plan of the HRA.
HRA Derogation Consultation	03.02.2025	National Trust	Letter received	<p>The Applicant contacted the National Trust regarding the potential use of Sheep Island (Northern Ireland) for compensatory measures as part of derogation proposals linked to the Offshore Wind Farm project. The aim was to clarify land ownership and explore feasibility for habitat restoration or predator eradication.</p> <ul style="list-style-type: none"> <li>National Trust confirmed it owns Sheep Island and has previously been approached by other Offshore Wind Farm developers for similar purposes. While the Trust does not object in principle to using its land for compensatory measures, it assesses requests on a case-by-case basis.</li> </ul>	The island selection is presented in Volume 3, Chapter 2: Compensation and Evidence Plan of the HRA.

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				<ul style="list-style-type: none"> <li>National Trust highlighted that access for pre-eradication surveys was recently refused for another developer and indicated the same decision would apply to Morven North and Morven South.</li> <li>National Trust suggested that the Applicant should explore alternative compensation sites, as the Trust does not own land in Scotland (where other sites are being considered).</li> </ul> <p>The National Trust effectively declined access to Sheep Island for Morven North and Morven South compensation measures and advised the developer to seek alternative options. They expressed openness to future collaboration on other suitable sites, provided sufficient lead time for planning.</p>	
HRA Derogation Consultation - Identification of Predator Control Measures	05.03.2025	NatureScot, MD-LOT	Virtual meeting	<p>This meeting aimed to discuss the identification of Valued Ornithological Receptors (VORs) for Morven North and Morven South. The consultation sought feedback from NatureScot and MD-LOT on baseline offshore ornithology reports, seasonal definitions, cumulative impact assessment scenarios, and compensation measures.</p> <ul style="list-style-type: none"> <li>NatureScot advised that cumulative impact assessment (CIA) scenarios must be agreed at the pre-application stage. They highlighted the need for clarity on whether Morven North and Morven South will be assessed individually or as a combined site and advised that the potential for double counting due to overlapping buffers should be considered.</li> <li>NatureScot noted peaks in guillemot and razorbill abundance may relate to post-breeding dispersal. They advised reviewing fledging dates and considering adjustments to seasonal definitions, such as adding a post-breeding dispersal period.</li> </ul>	<ul style="list-style-type: none"> <li>A description of the surveys undertaken to date, biosecurity planning, and monitoring is represented in Volume 3, Chapter 2: Compensation and Evidence Plan of the HRA with further details about the surveys in Volume 3, Annex 2.5 and 2.6 and monitoring in Volume 3, Chapter 3: Outline Compensation Implementation, Monitoring and Adaptive Management Plan of the HRA.</li> <li>The approach to Cumulative Effects Assessment (CEA) was agreed and the Applicant has followed NatureScot's advice in relation to seasonal definitions for guillemot throughout the assessments presented in Volume 2,</li> </ul>

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				<ul style="list-style-type: none"> <li>NatureScot acknowledged predator eradication could be beneficial but emphasised the need for detailed surveys, biosecurity planning, and monitoring. They encouraged early consultation on shortlisted islands and other measures like seagrass restoration or marine litter removal, while noting strategic alignment with plan-level compensation is still uncertain.</li> </ul>	Chapter 3: Report to Inform Appropriate Assessment (RIAA) Part 3: SPA and Ramsar Site Assessments of the HRA.
HRA Derogation - proposed predator eradication survey work consultation	21.03.2025	NatureScot	Email received	<p>The Applicant consulted NatureScot to confirm the seasonal classification for common guillemot and razorbill in distributional response assessments and to discuss proposed summer colony count and habitat surveys at shortlisted islands for potential predator eradication as compensation measures.</p> <ul style="list-style-type: none"> <li>NatureScot agreed with the Applicant's proposal to classify August as part of the non-breeding season, noting this was supported by Isle of May data and the absence of additional fledging data from nearby colonies.</li> <li>NatureScot confirmed agreement with the seasonal classification proposal.</li> </ul>	The seasonal classification for common guillemot and razorbill in distributional response assessments is presented in Volume 2, Chapter 3.1: RIAA Apportioning. Additionally, a description of the surveys done to date, biosecurity planning, and monitoring is represented in Volume 3, Chapter 2: Compensation and Evidence Plan of the HRA with further details about the survey in Volume 3, Chapter 2.5 and 2.6 and monitoring in Volume 3, Chapter 3: Outline Compensation Implementation, Monitoring and Adaptive Management Plan of the HRA.
HRA Derogation Consultation	16.05.2025	NatureScot	Email received	<p>The Applicant consulted NatureScot to ensure the proposed surveys would provide sufficient evidence to justify the effectiveness of predator removal for seabird conservation. The Applicant also sought advice on timing and techniques for stable isotope analysis and other diet assessment methods.</p> <ul style="list-style-type: none"> <li>NatureScot welcomed the high standard of the proposed scope and early baseline data</li> </ul>	The Applicant agreed to adjust the timing and scope of feasibility studies to address these concerns, including earlier surveys, enhanced photographic analysis, and consideration of isotope and eDNA methods. A description of the surveys completed to date, biosecurity

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				<p>collection but emphasised two critical considerations: assessing habitat accessibility for predators and gathering direct evidence of predation on seabirds. NatureScot recommended incorporating high-resolution photographs into the June surveys to calculate accessible cliff habitat and suggested stable isotope analysis as a potential method for confirming seabird predation, noting timing is crucial for meaningful results (response on 16 May 2025).</p> <ul style="list-style-type: none"> <li>NatureScot highlighted that previous eradication projects are not directly comparable because compensation measures require stronger evidence of effectiveness. They stressed that global assumptions about rat predation need site specific validation, especially for cliff-nesting species.</li> </ul>	<p>planning, and monitoring is represented in Volume 3, Chapter 2: Compensation and Evidence Plan of the HRA with further details about the survey in Volume 3, Annexes 2.5 and 2.6 of the HRA.</p>
HRA Derogation Consultation	19.05.2025	NatureScot	Email received	<p>The Applicant consulted NatureScot for any seagrass or similar habitat restoration projects around the Scottish coastline that have not yet secured funding, particularly those previously considered by Scottish Marine Environmental Enhancement Fund (SMEEF) but not progressed.</p> <ul style="list-style-type: none"> <li>NatureScot confirmed they are currently exploring more seagrass restoration projects but do not have a list of active projects available to share.</li> </ul>	<p>Short list measures for seagrass restoration (and other measures) are presented in Section 3.5 of Volume 3, Chapter 2: Compensation and Evidence Plan of the HRA.</p>
HRA Derogation Consultation	28.05.2025	NatureScot, MD-LOT	Virtual meeting	<p>The meeting aimed to review ongoing work on compensation measures for the Morven North and Morven South, focusing on predator eradication as the primary measure. It also sought feedback on other shortlisted measures, discuss preliminary impact modelling, and agree on next steps for engagement later in the year.</p> <ul style="list-style-type: none"> <li>NatureScot supported treating July as part of the post-breeding season for common guillemot and</li> </ul>	<ul style="list-style-type: none"> <li>Advice provided has been incorporated into the Compensation and Evidence Plan (Volume 3, Chapter 2: Compensation and Evidence Plan of the HRA).</li> <li>Long and short listing of measures has been set out in Sections 2 and 3 of Volume 3, Chapter 2: Compensation and</li> </ul>

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				<p>agreed with using the non-breeding apportioning approach in assessments. They emphasised the need for a dedicated session on in-combination assessments and flagged emerging policy changes that could influence compensation planning.</p> <ul style="list-style-type: none"> <li>NatureScot welcomed predator eradication as a primary measure but stressed the importance of gathering evidence on rat predation and habitat accessibility. They noted that previous eradication projects are not directly comparable and requested robust site specific data to justify compensation levels.</li> <li>The Applicant outlined plans for June colony counts and feasibility studies on Rum and Muck, including habitat mapping and potential use of thermal drones. They committed to sharing modelling outputs and incorporating NatureScot's feedback on evidence requirements.</li> </ul> <p>Both parties discussed supportive measures such as seaweed cultivation, fisheries bycatch reduction, sandeel closures, and habitat restoration. NatureScot expressed interest but highlighted that some concepts (e.g., seaweed farming) require more evidence before formal support can be given.</p>	<p>Evidence Plan of the HRA, which included feedback from stakeholders.</p> <ul style="list-style-type: none"> <li>Additionally a description of the island selection for predator eradication and surveys undertaken is presented in Section 4 of Volume 3, Chapter 2: Compensation and Evidence Plan of the HRA with further details about the survey in Volume 3, Annex 2.5: Island Screening Report and Annex 2.6: Pre-eradication Field Study Report.</li> <li>A further meeting was held with NatureScot on 18 August 2025 where the approach to CEA was agreed.</li> <li>The Applicant has followed NatureScot's advice in relation to seasonal definitions for guillemot throughout Volume 2, Chapter 3: RIAA Part 3: SPA and Ramsar Site Assessments of the HRA.</li> </ul>
HRA Derogation Consultation	16.10.2025	Royal Society for the Protection of Birds (RSPB) Scotland	Virtual meeting request	The Applicant consulted the RSPB Scotland to request a meeting to discuss proposed compensation measures for key seabird species.	Offers of meetings/workshops were not taken up by RSPB.
HRA Derogation Consultation	27.10.2025	RSPB Scotland	Virtual meeting request	The Applicant followed up on the previous correspondence and request for a workshop with RSPB Scotland to discuss proposed compensation measures for key seabird species.	Offers of meetings/workshops were not taken up by RSPB Scotland.

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HRA Derogation Consultation	28.10.2025	NatureScot, MD-LOT	Virtual meeting	<p>The meeting aimed to provide updated impact numbers for compensation, share progress on predator eradication work (including modelling, surveys, and landowner engagement), confirm which measures are being taken forward following previous advice, and discuss new proposals in relation to gannet compensation.</p> <ul style="list-style-type: none"> <li>NatureScot commended the proactive engagement with island communities and the comprehensive survey work, noting its alignment with previous advice. They emphasised the importance of integrating site specific habitat data and a holistic approach rather than relying solely on modelling for compensation estimates.</li> <li>NatureScot highlighted challenges in predicting seabird population recovery and advised using adaptive management alongside reasonable, evidence-based estimates. They stressed the need for clear justification of density assumptions and early provision of references to support statutory reviews.</li> <li>NatureScot supported focusing on Muck as the primary project-led measure while exploring Rum as a strategic opportunity through government-led initiatives.</li> <li>NatureScot considered the proposal regarding gannet as promising but noted difficulties in quantifying benefits. They acknowledged its ecological importance and agreed to review the measure further, suggesting collaboration if costs exceed project capacity.</li> </ul>	<p>A description of the surveys done to date, biosecurity planning, and monitoring is represented in Volume 3, Chapter 2: Compensation and Evidence Plan of the HRA with further details about the survey in Volume 3, Chapter 2.5 and 2.6 and monitoring in Volume 3, Chapter 3: Outline Compensation Implementation, Monitoring and Adaptive Management Plan of the HRA.</p>
HRA Derogation Consultation - gannet	02.12.2025	NatureScot	Email received	<p>NatureScot sent their advice on the proposed gannet compensation measure, following a note prepared by the Applicant.</p> <ul style="list-style-type: none"> <li>NatureScot agreed the measure has potential benefits for gannet.</li> </ul>	<p>Advice provided will be incorporated into documentation provided during the determination phase.</p>

Consultation title	Consultation date	Consultee	Consultation type	Issue(s) raised	Response to issue
				<ul style="list-style-type: none"> <li>NatureScot provided further advice however due to commercial sensitivity further detail will be provided during the determination phase.</li> </ul>	

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