



# MORECAMBE



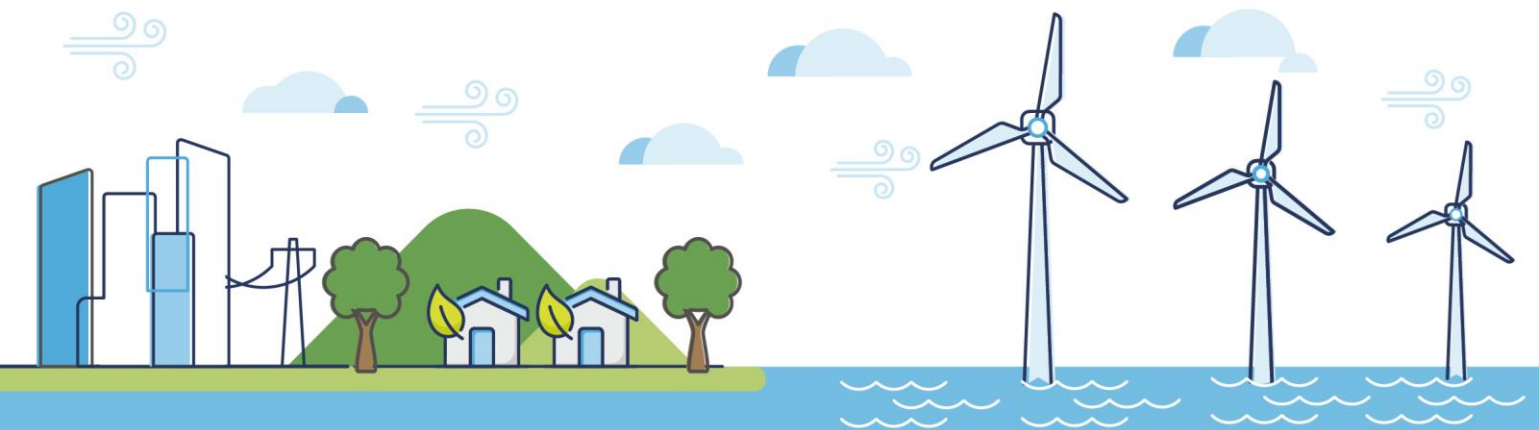
FLOTATION ENERGY

## **Morecambe Offshore Windfarm: Generation Assets** **Pre-Examination Documents**

### **Volume 7**

### **Initial response to the Planning Inspectorate's Rule 09 Letter for Morecambe Offshore Windfarm Generation Assets**

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Rev 01



## Document History

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01	17/09/224	Final	Morecambe Offshore Windfarm Ltd	Morecambe Offshore Windfarm Ltd	Morecambe Offshore Windfarm Ltd	N/A

17 September 2024  
The Planning Inspectorate  
National Infrastructure Planning  
Temple Quay House  
2 The Square  
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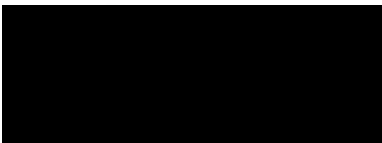
Dear Robert Jackson

**Response to the Planning Inspectorate’s Rule 09 Letter for Morecambe Offshore  
Windfarm Generation Assets**

Morecambe Offshore Windfarm Ltd (the Applicant) received a Rule 09 letter from the Planning Inspectorate on the 4 September 2024 (Reference EN010121). The letter included a request for specific information from the Applicant prior to 15 October 2024 and for an earlier indication (by 17 September 2024) on timings for providing this information.

This letter provides an indication of how the Applicant’s plans to respond to each matter and clarification raised (see **Table 1**). While the Applicant considers that all of the requested information can be provided by the deadline set in the Rule 09 letter, in some instances (particularly where the requested information relies on aligned data from other ongoing Examinations for projects in the Irish Sea), the Applicant notes that a later submission deadline (such as Deadline 1) may allow for more comprehensive and aligned responses and, as such, may be more efficient for the Examining Authority and stakeholders.

Yours sincerely



Rachel Watson  
Consent Manager, Morecambe Generation Assets

Table 1 Response to PINS Rule 09 letter

ID	PINS comment	Applicant's response
<b>Matters for the Applicant</b>		
01	<p>A full quantitative assessment of cumulative effects for ornithology following the method previously supplied by NE to the Applicant, i.e. where no quantitative data were available, using nearby windfarms with published estimates of mortality as proxies, scaled according to windfarm size and turbine specifications. We consider that this information is necessary to inform the consideration of the worst case scenario for ornithology.</p> <p>The Applicant should ensure co-ordination with other Irish Sea Offshore Windfarm projects regarding the datasets. Should datasets from other projects have been derived through a different method, then these differences should be highlighted and considered (NE ref B1, B14, B16, B18-21, B24).</p>	<p>The Applicant notes that this can be provided by 15 October 2024, however, the Examining Authority (ExA) may wish to consider whether it would prefer to receive this item at Deadline 1 as set out below.</p> <p>The Applicant has been engaging with the Morgan and Mona Offshore Wind Projects on the methodology for quantitative analysis for historical project gap filling, which has also been presented to Natural England.</p> <p>Natural England has confirmed that it considers it essential that cumulative values for Morecambe Offshore Windfarm Generation Assets, Morgan Offshore Wind Project Generation Assets and Mona Offshore Wind Project are consistent across the three projects. In addition to needing to ensure this consistency, the Applicant is also conscious that there are a number of interrelated updates to the ornithology assessment that will be required, and that it is unlikely that Natural England will provide a further position until all of these updates have been completed.</p> <p>It would be the Applicant's preference that all updates (including the updated cumulative assessment) are presented together in a single response at Deadline 1. This would reduce the likely requirement for subsequent updates and should streamline the process for review by stakeholders (including Natural England) and the ExA.</p> <p>Notwithstanding this, the Applicant could provide the updated cumulative values by 15 October 2024, if this remains the ExA's preference. This would be for the species requested by Natural England in its relevant representations (guillemot, herring gull, lesser black-backed gull, and great black-backed gull). This would incorporate the expected submission of historic datasets by the Mona project at its Deadline 3 (30 September 2024).</p>

ID	PINS comment	Applicant's response
		<p>However, the ExA may wish to consider whether it would prefer to receive the more comprehensive updates at Deadline 1, as per the Applicant's preference set out above. The Applicant would be grateful if the ExA would confirm its preference on this matter by 24 September 2024.</p>
02	<p>Updated assessment for lesser black backed gull at Morecambe Bay and Duddon Estuary Special Protection Area (SPA) and Ribble and Alt Estuary SPA that considers current population trajectories, noting updated figures being available for 2023 and refined apportioning of impacts (NE ref B3, B26, B27, B29).</p>	<p>The Applicant notes that this can be provided by 15 October 2024, however, the ExA may wish to consider whether it would prefer to receive this item at Deadline 1 as set out below.</p> <p>It is noted that the ExA has also requested information from Natural England by 15 October 2024 in its Rule 09 letter, specifically confirmation on the colonies that should be excluded from the apportioning. While the Applicant can provide the updated assessment as requested by 15 October 2024, the Applicant will not be able to provide an updated assessment that incorporates excluded colonies until this information has been received from Natural England. In addition, it is also noted that Natural England has requested an updated approach to use of 'proxy' values for apportioning of historic projects for the in-combination assessment. The Applicant is currently seeking clarification from Natural England on this matter, with a view to updating this approach (if required) at Deadline 1.</p> <p>As above, therefore, it would be the Applicant's preference to present all of these updates together in a version of the updated assessment submitted at Deadline 1 as this will streamline the process for review by stakeholders (including Natural England) and the ExA. The Applicant would be grateful if the ExA would confirm its preference on this matter by 24 September 2024.</p>
03	<p>Updated assessment using average mortality rates recommended in the NE and Natural Resources Wales (NRW) interim advice note and as set out in Annex A of Annex B1 (NE ref B9).</p>	<p>The Applicant notes that this can be provided by 15 October 2024, however, the ExA may wish to consider whether it would prefer to receive this item at Deadline 1.</p> <p>As noted in the response to ID 01 above, the Applicant considers that providing all updates to this assessment in a single response at Deadline 1 would streamline the process for review and</p>

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		response by stakeholders (including Natural England) and the ExA. The Applicant would be grateful if the ExA would confirm its preference on this matter by 24 September 2024.
04	Review and update of the months assigned to each season for gannet where necessary, noting the inconsistencies identified by NE (NE ref B10).	The Applicant notes a review has been undertaken with no resultant change to the assessment conclusion. An update will be provided by 15 October 2024.
05	Check and confirmation of the total annual lower and upper confidence interval values in the Collision Risk Modelling (CRM) results table (NE ref B10).	The Applicant has reviewed the values and confirms these are correct. A response will be provided by 15 October 2024.
06	Provision of log files for the little gull stochastic CRM run including full inputs and outputs and details of any methodological updates (NE ref B11).	The Applicant has provided Natural England on 15 August 2024 with all input and output files for little gull from the sCRM, so that these values can be checked, if required, noting the Applicant will provide a response on the associated methodology by 15 October 2024. If the ExA would like to also receive the input and output files, these can be provided.
07	Check and confirm the non-breeding collisions for great black-backed gull along with confirmation as to whether this changes any conclusions made (NE ref B12).	The Applicant notes the minor omission and confirms there are no changes to the conclusions. A response will be provided by 15 October 2024.
08	Updated presentation of the Interim Population Consequences of Disturbance Model (iPCoD) modelling results and present impact significance for all approaches used to assess disturbance impacts (NE Ref D4).	The Applicant notes a response to clarify the approach will be provided by 15 October 2024. This will be provided for information alongside justification for using iPCoD modelling results upon which to base the overall significance.
09	Confirmation of the maximum piling duration based on a lower strike rate in the underwater noise assessment and an updated underwater noise taking account any change in the findings of significance (NE Ref D11).	The Applicant notes a response to clarify the approach will be provided by 15 October 2024.
10	Modelling of a nominal 750kg Unexploded Ordnance (UXO) charge weight for the assessment of underwater UXO noise impacts, unless clear evidence is available to demonstrate that a lesser charge weight represents the actual worst case (NE Ref D12).	The Applicant notes a response to clarify the approach will be provided by 15 October 2024. The Applicant notes Natural England ref D12 is an item of note. This has been discussed with Natural England (12 September 2024) and the Applicant intends to signpost evidence on the charge weight used. The Applicant

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		would undertake further discussion with Natural England when a separate marine licence application is made for any UXO clearance, noting that UXO clearance is not included under this DCO Application.
11	Commentary on whether harbour seal populations are present at the Isle of Man (NE ref D2, D13).	The Applicant notes a response to clarify the approach will be provided by 15 October 2024.
12	A review and update of collision risk rate calculations where relevant (NE Ref D26).	The Applicant notes a review has been undertaken and an update will be provided by 15 October 2024, noting there are no changes to the assessment conclusions.
13	Presentation of impact significance for each approach used to determine the marine mammal disturbance range, using the combination of sensitivity and magnitude (percentage of reference population within the disturbance range) and present the cumulative impact significance for cetaceans using the worst-case numbers disturbed i.e. not only the iPCoD modelling results (NE Ref D28).	The Applicant notes information on the significance for all disturbance calculation methods will be provided by 15 October 2024, however this will be provided for information alongside justification for using iPCoD modelling results upon which to base the overall significance.
14	Clarification of the values in the median impacted as percentage of unimpacted column in Table 11.39. These do not currently correspond to the difference between the un-impacted population mean and the impacted population mean. The difference between the two means in each table that presents iPCoD modelling results, including in the cumulative effects assessment should be presented or the difference between these figures explained. Information should be provided to support the value considered to be most appropriate (NE Ref D32).	The Applicant notes a response to clarify the approach will be provided by 15 October 2024.
15	Confirmation of the worst case assessment for benthic ecology, physical processes, marine sediment and water quality impacts due to UXO (NE Ref E11, F9).	The Applicant notes a response to clarify the approach, or any additional information, will be provided by 15 October 2024.

ID	PINS comment	Applicant's response
<b>Annex A Clarifications</b>		
16	ES para 5.94 refers to 10% sand wave clearance but Chapter 7, Table 7.1 confirms that there are no sand waves within the site. Clarify whether the term sand wave clearance is used in the generic sense of clearance of seabed sand features.	The Applicant will provide a clarification by 15 October 2024.
17	Table 9.2 references a 25m wide cable installation corridor. Other chapters, for example ES Chapter 5 (para 5.148), ES Chapter 7 (Table 7.2, p43) and ES Chapter 8 (Table 8.2), refer to 10m wide clearance widths. It is unclear whether installation corridor and clearance widths are intended to be synonymous but if so, clarify which width is correct and ensure that any dependent assessments are updated where relevant.	The Applicant will provide a clarification by 15 October 2024.
18	Errata in Table 10.8 low criteria, confirm whether text should read temporary* 'change'.	The Applicant will provide a clarification by 15 October 2024.
19	Para 10.73 states 'for fish and shellfish' but Table 10.13 only shows spawning/ nursery ground information for fish. Is this correct?	The Applicant will provide a clarification by 15 October 2024.
20	Figures have a grey line that relates to certain population extents but the relevant population is not explained in the key.	The Applicant will provide a clarification and provide updated figures by 15 October 2024.