



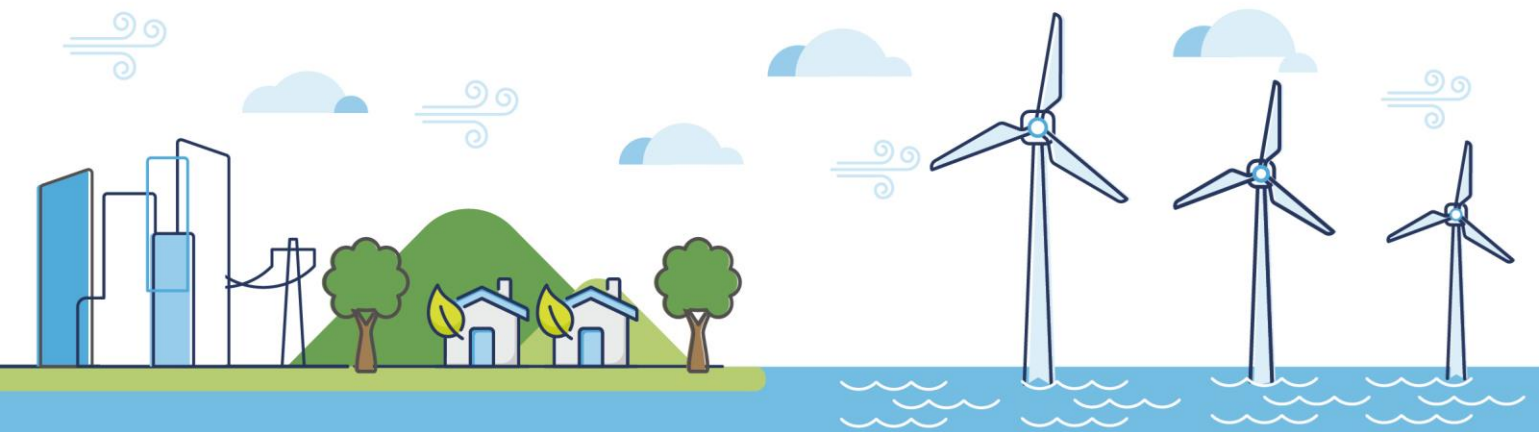
Morecambe Offshore Windfarm: Generation Assets Procedural Deadline A

Volume 8

The Applicant's Response to the Rule 6 Letter for Morecambe Offshore Windfarm Generation Assets

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Glossary of Acronyms

ASI	Accompanied Site Inspection
DCO	Development Consent Order
EM	Explanatory Memorandum
ExA	Examining Authority
ExQ1	Examining Authority's First Written Questions
ExQ2	Examining Authority's Second Written Questions
ISH	Issue Specific Hearing
MMO	Marine Management Organisation
OFH	Open Floor Hearing
RIES	Report on the Implications for European Sites
RR	Relevant Representation
SLVIA	Seascape, Landscape and Visual Impact Assessment
WR	Written Representation

Glossary of Terminology

Applicant	Morecambe Offshore Windfarm Ltd
Generation Assets (the Project)	Generation Assets associated with the Morecambe Offshore Windfarm. This is infrastructure in connection with electricity production, namely the fixed foundation wind turbine generators, inter-array cables, offshore substation platform(s) and possible platform link cables to connect offshore substation platform(s).



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1 Introduction

1. This document presents a response to the matters outlined by the Examining Authority (ExA) in a Rule 6 Letter (PD-007) issued to Morecambe Offshore Windfarm Ltd (the Applicant) on the 23 September 2024. This includes certain matters requested by the ExA in the Rule 9 Letter (PD-006) issued to the Applicant on 4 September 2024 and which, as agreed in the Rule 6 Letter, are due at Procedural Deadline A (outlined in **Section 2**).
2. Matters raised by the ExA have been addressed by the Applicant in **Table 2.1** and are submitted at Procedural Deadline A on 15 October 2024.
3. A response to the draft Examination timetable and procedure is outlined in **Table 3.1**.

2 Additional submissions at Procedural Deadline A

4. The following documents have been submitted alongside this response document:
 - **1.3 Guide to the Application**

The Applicant has provided an updated Guide to the Application following the submission of additional documents since the Project's Development Consent Order (DCO) Application submission
 - **3.1 Draft Development Consent Order (Clean) and 3.1 Draft Development Consent Order (Tracked)**

The Applicant has provided an updated draft Development Consent Order (DCO) (clean and tracked) to address issues raised in relevant representations (RR), and in reviewing comments made by the ExA in Appendix F to the Rule 6 Letter (PD-007), issued to the Applicant on 23 September 2024
 - **3.2 Explanatory Memorandum (Rev 02) and 3.2.1 Explanatory Memorandum (Tracked)**

The Applicant has provided an updated Explanatory Memorandum (clean and tracked) to reflect the changes made to the draft DCO (as outlined above)
 - **3.4 Schedule of Changes to the Draft Development Consent Order**

The Applicant has provided a Schedule of Changes to the draft DCO (following updates made to the draft DCO (see above))

- **5.3.10 Chapter 10 Fish and Shellfish Ecology Figures_Rev 02**

The Applicant has provided an updated Figure 10.6 and additional Figure 10.10 in response to the Marine Management Organisation (MMO) RR (RR-047-57)

- **5.2.11.2 Appendix 11.2 Marine Mammal Information and Survey Data_Rev 02**

The Applicant has provided updates to Figure 6.1 and Figure 6.2 within Appendix 11.2 Marine Mammal Information and Survey Data (APP-066) following comments made by the ExA in the Rule 9 Letter (ID R9-21) (PD-006)

- **8.2 The Applicant's Response to the Rule 9 Letter for Morecambe Offshore Windfarm Generation Assets**

The Applicant has provided a response to the ExA's Rule 9 Letter, issued to the Applicant on 4 September 2024 (PD-006)

- **8.3 The Applicant's Response to Relevant Representations**

The Applicant has submitted responses to all RRs received from interested parties on the Project's DCO Application.

- **8.4 The Applicant's Errata Sheet**

The Applicant has provided an errata sheet detailing a small number of discrepancies and/or clarifications to be made within the DCO Application documents.

- **8.5 Combined Examination Progress Tracker and Statement of Commonality**

The Applicant has submitted a Combined Examination Progress Tracker and Statement of Commonality, as requested by the ExA in the Rule 6 Letter (PD-007) (outlined in ID R6-04 in **Table 2.1**)

Table 2.1 Response to the ExA's Rule 6 letter (PD-007)

ID	Matter	Applicant's Response
R6-01	Written submissions on the Examination Procedure, including any submissions about the draft Examination Timetable	Comments on the draft Examination Timetable are provided in Section 3 below.
R6-02	Comments on RRs (Appendix G)	<p>The Applicant has provided a response to Relevant Representations as part of Procedural Deadline A (8.3 The Applicant's Response to Relevant Representations).</p> <p>A corresponding errata sheet has been submitted alongside this document at Procedural Deadline A (The Applicant's Errata Sheet (Document Reference 8.4)).</p>
R6-03	Summaries of all RRs exceeding 1500 words	Noted, no response required by the Applicant.
R6-04	Submission of Pre-examination Progress Tracker (Appendix G)	The Applicant has provided a combined Examination Progress Tracker and Statement of Commonality as part of Procedural Deadline A (Combined Examination Progress Tracker and Statement of Commonality (Document Reference 8.5)).
R6-05	Receipt of matters requested in Rule 9 letter of 4 September 2024 [PD-006] (apart from those items referred to in Appendix G item 10)	The Applicant has provided a response to the matters raised in Rule 9 letter as part of Procedural Deadline A (The Applicant's Response to the Rule 9 Letter (Document Reference 8.2)).
R6-06	Requests to be heard orally at the Preliminary Meeting including which agenda items you wish to speak on (Appendix A)	The Applicant confirms its attendance at the Preliminary Meeting.
R6-07	Requests to participate in the Open Floor Hearing (OFH1) on Wednesday 23 October 2024	The Applicant confirms its attendance at OFH1 on Wednesday 23 October 2024, should an Open Floor Hearing be required.
R6-08	Requests to participate in the Issue Specific Hearing 1 (ISH1) on Thursday 24 October 2024	The Applicant confirms its attendance at ISH1 on 24 October 2024.
R6-09	Suggested locations for site inspections for consideration by the ExA, including justification, and whether such	As the proposed development is entirely within the marine environment (approximately 30km from the nearest point on the coast

ID	Matter	Applicant's Response
	<p>locations can be seen from public land or require private access</p>	<p>of Lancashire, 50km from the north coast of Wales and 59km from the coast of the Isle of Man), the Applicant does not consider an accompanied site inspection to be necessary. The Applicant notes, however, that an Unaccompanied Site Inspection was undertaken on 9, 10 and 11 September 2024.</p> <p>The Applicant does not consider that any of the viewpoints within Chapter 18 Seascape, Landscape and Visual Impact Assessment (SLVIA) (APP-055) to require an accompanied site inspection to explain their context and surroundings.</p>

3 Response to the draft Examination timetable and procedure

5. The Applicant's comments on the proposed timetable for the Examination are set out in **Table 3.1**.
6. The Applicant notes that the Preliminary Meeting, OFH1 (if required) and ISH1 will be blended events. While the Applicant will attend all hearings in person, the Applicant supports the use of blended events where some parties attend in person and some attend virtually.

Table 3.1 The Applicant's comments on the proposed timetable for the Examination

Item	Matters	Date	Applicant's comments and suggested alternative dates
1.	<p>Pre-Examination Procedural Deadline A</p> <p>Deadline for receipt by the ExA of:</p> <ul style="list-style-type: none"> ▪ Written submissions on the Examination Procedure, including any submissions about the draft Examination Timetable ▪ Comments on Relevant Representations (RRs) (Appendix G) ▪ Summaries of all RRs exceeding 1500 words ▪ Submission of Pre-examination Progress Tracker (Appendix G) ▪ Receipt of matters requested in Rule 9 letter of 4 September 2024 [PD-006] (apart from those items referred to in Appendix G item 10). ▪ Requests to be heard orally at the Preliminary Meeting including which agenda items you wish to speak on (Appendix A) ▪ Requests to participate in the Open Floor Hearing (OFH1) on Wednesday 23 October 2024 ▪ Requests to participate in the Issue Specific Hearing 1 (ISH1) on Thursday 24 October 2024 ▪ Suggested locations for site inspections for consideration by the ExA, including justification, and whether such locations can be seen from public land or require private access 	<p>Tuesday 15 October 2024</p>	<p>No comment on timing of procedural deadline.</p> <p>In responding to relevant representations, and in reviewing comments made by the ExA in Appendix F to the Rule 6 letter (PD-007), the Applicant has noted that there are amendments to make to the draft DCO (APP-012). The Applicant notes that the ExA has requested the first revised draft DCO at Deadline 2, but the Applicant considers that it would be beneficial for Interested Parties and the ExA to have sight of a revised draft at Procedural Deadline A concurrently with its responses to relevant representations.</p> <p>The Applicant has therefore submitted clean and tracked versions of the draft DCO (3.1 Draft Development Consent Order (Rev 02) and 3.1.1 Draft Development Consent Order (Tracked)) and a Schedule of Changes (3.4 Schedule of Changes to the Draft Development Consent Order) to the draft DCO.</p>
2.	<p>Preliminary Meeting</p>	<p>Wednesday 23 October 2024 2:00pm</p>	<p>No comment</p>

Item	Matters	Date	Applicant's comments and suggested alternative dates
3.	Open Floor Hearing (OFH1) (if required)	Wednesday 23 October 2024 5:00pm	No comment
4.	Issue Specific Hearing (ISH1) ISH1 on the Scope of Development and Interrelationship with other Infrastructure Projects, the Development Consent Order (DCO) and Explanatory Memorandum (EM)	Thursday 24 October 2024 10:00am	No comment
5.	Issue by the ExA of: <ul style="list-style-type: none"> ▪ Examination Timetable ▪ Any Written Questions deemed necessary arising from ISH1 (if required) 	As soon as possible following the Preliminary Meeting	No comment
6.	Deadline 1 For receipt by the ExA of: <ul style="list-style-type: none"> ▪ Post-hearing submissions for OFH1 and ISH1, including written submissions of oral cases and comments on any oral submissions put at the hearings ▪ Declarations of use of Artificial Intelligence in preparation of any submissions to date (Appendix G). ▪ Written Representations (WRs) including summaries if exceeding 1500 words ▪ Summaries of all RRs exceeding 1500 words (if not provided at the pre-Examination Procedural Deadline) ▪ Responses to RRs (if not provided at the pre-Examination Procedural Deadline) ▪ Initial Statements of Common Ground (SoCGs) and Statement of Commonality (or as combined with the Progress Tracker) (Appendix G) ▪ Submission of Report on interrelationship with other infrastructure projects (Appendices D and G) 	Tuesday 26 November 2024	No comment

Item	Matters	Date	Applicant's comments and suggested alternative dates
	<ul style="list-style-type: none"> ▪ Outstanding information from the Applicant in response to Rule 9 letter of 4 September 2024 [PD-006] ▪ Requests by Interested Parties to be heard at a Further Open Floor Hearing (OFH) ▪ Notification by Statutory Parties of their wish to be considered as an IP by the ExA ▪ Notification of wish to have future correspondence received electronically ▪ Comments on any further information/ additional submissions accepted by the ExA ▪ Any further information requested by the ExA under Rule 17 of The Infrastructure Planning (Examination Procedure) Rules 2010 		
7.	<p>Deadline 2 For receipt by the ExA of:</p> <ul style="list-style-type: none"> ▪ Comments on WRs ▪ Responses to any written questions arising from ISH1 (if supplied) ▪ Applicant's Progress Tracker / Statement of Commonality ▪ Applicant's first update to the draft DCO and EM ▪ Applicant's first update to the Guide to the Application ▪ Applicant's draft itinerary for ASI (if required) ▪ Any other updated documents and statements from the Applicant deemed necessary following responses at Deadline 1 (if required) ▪ Comments on any other submissions received at Deadline 1 	Thursday 12 December 2024	No changes proposed, subject to the Applicant's comments in respect of the publication of Examining Authority's First Written Question (ExQ1) below.

Item	Matters	Date	Applicant's comments and suggested alternative dates
	<ul style="list-style-type: none"> ▪ Any further information requested by the ExA under Rule 17 of the Infrastructure Planning (Examination Procedure) Rules 2010 		
8.	<p>Publication by the ExA of:</p> <ul style="list-style-type: none"> ▪ ExQ1 	Wednesday 18 December 2024	<p>The Applicant is mindful that this date is close to the holiday period and that many stakeholders (including the Applicant's external consultants) may close for the holiday period on Friday 20 December 2024. The Applicant would be grateful if the ExA would consider an earlier date for publication of ExQ1. If the ExA considers that Deadline 2 needs to be brought forward to facilitate such a change to ExQ1, the Applicant would suggest moving Deadline 2 forward by a few working days (i.e. to Tuesday 10 December 2024).</p>
9.	<p>Deadline 3 For receipt by the ExA of:</p> <ul style="list-style-type: none"> ▪ Responses to ExQ1 ▪ Comments on the Applicant's first update to the draft DCO and EM ▪ Comments on the progress tracker / Statement of Commonality ▪ Comments on the Applicant's draft itinerary for the ASI (if required) ▪ Notification of wish to attend the ASI (if required) ▪ Any other updated documents and statements from the Applicant deemed necessary following responses at Deadline 2 (if required) 	Wednesday 15 January 2025	<p>The Applicant requests that this deadline is fixed for Friday 17 January 2025. The Applicant notes that Deadline 3 falls after the holiday period. The Applicant believes that availability of its team (including external advisors) and Interested Parties will be affected by the dates of the holiday period, with 6 January 2025 being a likely return to the office following holiday office closures.</p> <p>The Applicant considers that it would be beneficial to the Examination to allow a later date for Deadline 3. The Applicant considers that moving Deadline 3 to</p>

Item	Matters	Date	Applicant's comments and suggested alternative dates
	<ul style="list-style-type: none"> ▪ Comments on any other submissions received at Deadline 2 ▪ Any further information requested by the ExA under Rule 17 of The Infrastructure Planning (Examination Procedure) Rules 2010 		<p>Friday 17 January would allow for two full working weeks after the holiday period and possible office closures.</p> <p>The Applicant notes that there are no immediate Deadlines after Deadline 3 and as such this request will not have an impact on the remainder of the proposed Examination timetable.</p>
10.	<p>Publication by the ExA of:</p> <ul style="list-style-type: none"> ▪ Final itinerary for the ASI (if required) 	Wednesday 22 January 2025	No comment
11.	<p>Dates reserved for:</p> <ul style="list-style-type: none"> ▪ Further Issue Specific Hearings (if required) ▪ Further Open Floor Hearing (if required) ▪ Accompanied Site Inspection (if required) 	Week commencing 27 January 2025	No comment
12.	<p>Deadline 4</p> <p>For receipt by the ExA of:</p> <ul style="list-style-type: none"> ▪ Post-hearing submissions including written submissions of oral cases (if required) ▪ Applicant's mid-Examination Progress Tracker / update to the Statement of Commonality ▪ Mid-Examination Report on interrelationship with other infrastructure projects ▪ Applicant's second update to the draft DCO and EM ▪ Applicant's second update to the Guide to the Application ▪ Any other updated documents and statements from the Applicant deemed necessary following responses at Deadline 3 (if required) 	Tuesday 11 February 2025	No comment

Item	Matters	Date	Applicant's comments and suggested alternative dates
	<ul style="list-style-type: none"> Comments on any other submissions received at Deadline 3 Any further information requested by the ExA under Rule 17 of The Infrastructure Planning (Examination Procedure) Rules 2010 		
13.	Publication by the ExA of: Examining Authority's Second Written Question (ExQ2) (if required)	Thursday 20 February 2025	No comment
14.	Deadline 5 For receipt by the ExA of: <ul style="list-style-type: none"> Responses to ExQ2 (if required) Any other updated documents and statements from the Applicant deemed necessary following responses at Deadline 4 (if required) Comments on any other submissions received at Deadline 4 Any further information requested by the ExA under Rule 17 of The Infrastructure Planning (Examination Procedure) Rules 2010 	Tuesday 11 March 2025	No comment
15.	Publication by the ExA of: <ul style="list-style-type: none"> Report on the Implications for European Sites (RIES) and any associated questions (if required) ExA's commentary on, or schedule of changes to, the draft DCO (if required) 	Tuesday 25 March 2025	No comment
16.	Reserve dates for: <ul style="list-style-type: none"> Further Hearings (if required) 	Week commencing 31 March 2025	No comment
17.	Deadline 6	Tuesday 15 April 2025	No comment

Item	Matters	Date	Applicant's comments and suggested alternative dates
	<p>For receipt by the ExA of:</p> <ul style="list-style-type: none"> ▪ Post-hearing submissions including written submissions of oral cases (if applicable) ▪ Comments on responses to ExQ2 (if provided) ▪ Comments on the RIES (if provided) ▪ Comments on the ExA's commentary on, or schedule of changes to, the draft DCO (if provided) ▪ Finalised Statements of Common Ground ▪ Final Statement of Commonality/ Close of Examination Progress Tracker ▪ Applicant's Closing Statement with summary of areas of disagreement ▪ Closing Statements from Interested Parties regarding matters that they have previously raised during the Examination and have not been resolved to their satisfaction (if desired) ▪ Final Report on interrelationship with other infrastructure projects ▪ Final draft DCO to be submitted by the Applicant in the SI template with the SI template validation report together with final draft EM ▪ Final Guide to the Application ▪ Any other updated documents and statements from the Applicant deemed necessary following responses at Deadline 5 (if required) ▪ Comments on any further information/ submissions received by Deadline 5 		

Item	Matters	Date	Applicant's comments and suggested alternative dates
	<ul style="list-style-type: none"> Any further information requested by the ExA under Rule 17 of The Infrastructure Planning (Examination Procedure) Rules 2010 		
18.	<p>The ExA is under a duty to complete the Examination of the application by the end of the period of six months.</p> <p>Please note that the ExA may close the Examination before the end of the six-month period if it is satisfied that all relevant matters have been addressed and discussed.</p>	Wednesday 23 April 2025	No comment