

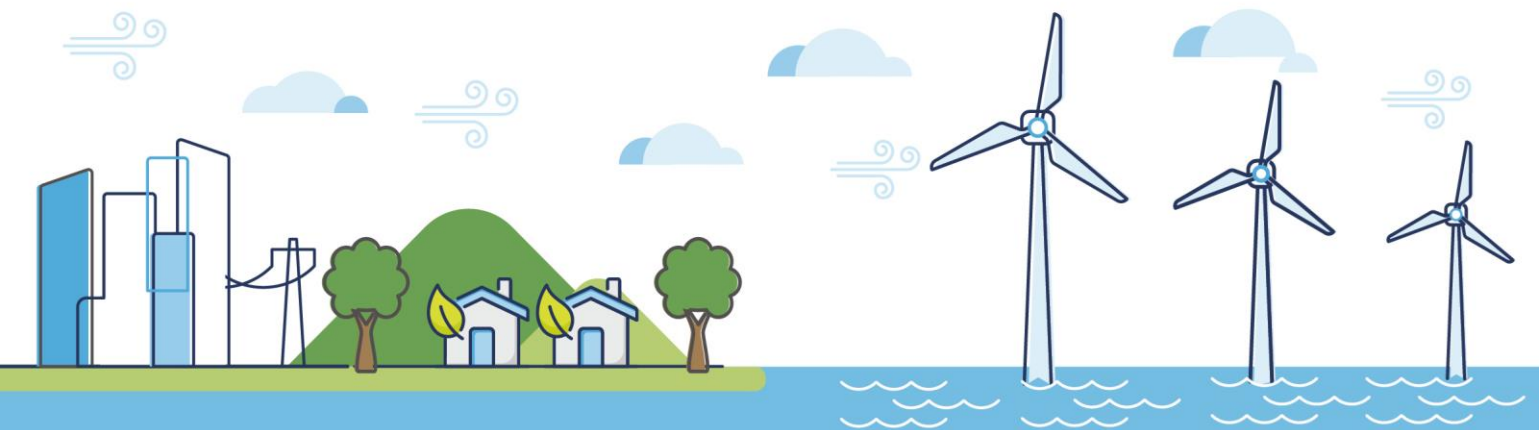


# Morecambe Offshore Windfarm: Generation Assets Examination Documents

## Volume 9

### Outstanding Information from the Applicant in Response to the Rule 9 Letter

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Rev 01



## Document History

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19 November 2024  
The Planning Inspectorate  
National Infrastructure Planning  
Temple Quay House  
2 The Square  
Bristol, BS1 6PN

Dear Robert Jackson

**Outstanding Information from the Applicant in Response to the Planning Inspectorate's Rule 09 Letter for Morecambe Offshore Windfarm Generation Assets**

Morecambe Offshore Windfarm Ltd (the Applicant) received a Rule 9 letter from the Planning Inspectorate on the 4 September 2024 (PD-006). 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. The Applicant's Initial Response to the Examining Authorities (ExA's) Rule 9 Letter ([AS-012](#)), issued by the Applicant to the ExA on the 17 September 2024, outlined those matters and/or clarifications that would be provided at Procedural Deadline A (15 October 2024; The Applicant's Response to the Rule 9 Letter ([PD1-010](#))) and Deadline 1 (26 November 2024). This approach was confirmed by the ExA in a Rule 6 Letter (PD-007, 24 September 2024).

This letter provides an indication of how the outstanding matters (ID 01 to ID 03) have been addressed alongside those previously addressed in [PD1-010](#) (see **Table 1**), signposting to the relevant document.

Yours sincerely



Oliver Gardner  
Consent Manager, Morecambe Generation Assets

Table 1 Outstanding responses to PINS Rule 9 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>As noted in The Initial Response to the Planning Inspectorate's Rule 09 Letter (AS-012), the Applicant has been engaging with the Morgan Offshore Wind Project Generation Assets and Mona Offshore Wind Project on the methodology for quantitative analysis for historical project gap filling, which has also been presented to Natural England.</p> <p>Natural England has stated that the cumulative values for Morecambe Offshore Windfarm Generation Assets, Morgan Offshore Wind Project Generation Assets and Mona Offshore Wind Project should be consistent across the three projects.</p> <p>In addition to needing to ensure this consistency, the Applicant was also conscious that there were a number of interrelated updates to the ornithology assessment that were required, and that it was unlikely that Natural England would provide a further position until all of the updates had been completed. It was therefore the Applicant's preference that all updates (including the updated cumulative assessment) would be presented together in a single response at Deadline 1 to reduce the likely requirement for subsequent updates.</p> <p>The ExA agreed that this information could be provided at Deadline 1 (26 November 2024) in their Rule 6 Letter (24 September 2024), rather than Procedural Deadline A (15 October 2024).</p> <p>Please refer to Offshore Ornithology Technical Note 1 (Environmental Impact Assessment (EIA)) (Document Reference 9.22), submitted alongside this letter at Deadline 1.</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</p>	<p>As noted in The Initial Response to the Planning Inspectorate's Rule 09 Letter (AS-012), the Applicant was unable to provide an updated assessment that incorporated excluded colonies until confirmation from Natural England on which colonies should be excluded. In addition, it was also noted that Natural England had requested an</p>

ID	PINS comment	Applicant's response
	for 2023 and refined apportioning of impacts (NE ref B3, B26, B27, B29).	<p>updated approach to use of 'proxy' values for apportioning of historic projects for the in-combination assessment. The Applicant was awaiting clarification from Natural England on this matter. Therefore, as above, it was the Applicant's preference to present all of these updates together in a version of the updated assessment at Deadline 1 to streamline the process for review by stakeholders (including Natural England) and the ExA.</p> <p>The ExA agreed that this could be provided at Deadline 1 (26 November 2024) in their Rule 6 Letter (24 September 2024), rather than Procedural Deadline A (15 October 2024).</p> <p>Please refer to Offshore Ornithology Technical Note 2 (Habitat Regulations Assessment (HRA)) (Document Reference 9.23), submitted alongside this letter at Deadline 1.</p>
03	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>As noted above, the Applicant considered that providing all updates to the assessment in a single response at Deadline 1 would streamline the process for review and response by stakeholders (including Natural England) and the ExA.</p> <p>The ExA agreed that this could be provided at Deadline 1 (26 November 2024) in their Rule 6 Letter (24 September 2024), rather than Procedural Deadline A (15 October 2024).</p> <p>Please refer to Offshore Ornithology Technical Note 1 (EIA) (Document Reference 9.22), submitted alongside this letter at Deadline 1.</p>
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 provided a review and update of the months assigned to each season for gannet in Section 4.1 of The Applicant's Response to the Rule 9 Letter for Morecambe Offshore Windfarm Generation Assets (PD1-010), submitted at Procedural Deadline A on 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 provided a clarification in Table 2.1 in The Applicant's Response to the Rule 9 Letter for Morecambe Offshore Windfarm Generation Assets (PD1-010), submitted at Procedural Deadline A on 15 October 2024.

ID	PINS comment	Applicant's response
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).	<p>The Applicant provided a clarification in Table 2.1 in The Applicant's Response to the Rule 9 Letter for Morecambe Offshore Windfarm Generation Assets (PD1-010), submitted at Procedural Deadline A on 15 October 2024.</p> <p>The Applicant provided Natural England on the 15 August 2024 with input and output files from the sCRM, so that these values could be checked. This was followed up by a file containing flight height data for little gull on 30 October 2024 following an update meeting with Natural England.</p>
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 provided a clarification in Table 2.1 in The Applicant's Response to the Rule 9 Letter for Morecambe Offshore Windfarm Generation Assets (PD1-010), submitted at Procedural Deadline A on 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 provided updated information and supporting text for the approach taken by the Applicant in the assessment in Section 5.1 of The Applicant's Response to the Rule 9 Letter for Morecambe Offshore Windfarm Generation Assets (PD1-010) submitted at Procedural Deadline A on 15 October 2024.
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 provided a clarification in Table 2.1 in The Applicant's Response to the Rule 9 Letter for Morecambe Offshore Windfarm Generation Assets (PD1-010), submitted at Procedural Deadline A on 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 provided a justification for the charge weight used in Section 6.1 of The Applicant's Response to the Rule 9 Letter for Morecambe Offshore Windfarm Generation Assets (PD1-010), submitted at Procedural Deadline A on 15 October 2024.
11	Commentary on whether harbour seal populations are present at the Isle of Man (NE ref D2, D13).	The Applicant provided a clarification in Table 2.1 in The Applicant's Response to the Rule 9 Letter for Morecambe Offshore Windfarm Generation Assets (PD1-010), submitted at Procedural Deadline A on 15 October 2024.

ID	PINS comment	Applicant's response
12	Provision of an assessment for grey seal against the North West Marine Unit (NW MU) grey seal population alone as a reference population (NE ref D2, D15).	The Applicant provided a clarification in Table 2.1 in The Applicant's Response to the Rule 9 Letter for Morecambe Offshore Windfarm Generation Assets (PD1-010) submitted at Procedural Deadline A on 15 October 2024.
13	A review and update of collision risk rate calculations where relevant (NE Ref D26).	The Applicant provided an update to the data used to calculate the collision risk rate in Section 5.2 of The Applicant's Response to the Rule 9 Letter for Morecambe Offshore Windfarm Generation Assets (PD1-010), submitted at Procedural Deadline A on 15 October 2024.
14	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 provided updated information and supporting text for the approach taken by the Applicant in the assessment in Section 5.1 of The Applicant's Response to the Rule 9 Letter for Morecambe Offshore Windfarm Generation Assets (PD1-010) submitted at Procedural Deadline A on 15 October 2024.
15	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 provided further metrics, explanation and clarification in Section 5.3 of The Applicant's Response to the Rule 9 Letter for Morecambe Offshore Windfarm Generation Assets (PD1-010), submitted at Procedural Deadline A on 15 October 2024.
16	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 provided a clarification of the worst-case assessment for benthic ecology, physical processes, marine sediment and water quality impacts due to UXO in Section 6.2 of The Applicant's Response to the Rule 9 Letter for Morecambe Offshore Windfarm Generation Assets (PD1-010), submitted at Procedural Deadline A on 15 October 2024.

ID	PINS comment	Applicant's response
<b>Annex A Clarifications</b>		
17	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 provided a clarification in Table 3.1 in The Applicant's Response to the Rule 9 Letter for Morecambe Offshore Windfarm Generation Assets (PD1-010), submitted at Procedural Deadline A on 15 October 2024.
18	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 provided a clarification in Table 3.1 in The Applicant's Response to the Rule 9 Letter for Morecambe Offshore Windfarm Generation Assets (PD1-010), submitted at Procedural Deadline A on 15 October 2024.
19	Errata in Table 10.8 low criteria, confirm whether text should read temporary* 'change'.	The Applicant provided a clarification in Table 3.1 in The Applicant's Response to the Rule 9 Letter for Morecambe Offshore Windfarm Generation Assets (PD1-010), submitted at Procedural Deadline A on 15 October 2024.
20	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 provided a clarification in Table 3.1 in The Applicant's Response to the Rule 9 Letter for Morecambe Offshore Windfarm Generation Assets (PD1-010), submitted at Procedural Deadline A on 15 October 2024.
21	Figures have a grey line that relates to certain population extents but the relevant population is not explained in the key.	<p>The Applicant provided a clarification in Table 3.1 in The Applicant's Response to the Rule 9 Letter for Morecambe Offshore Windfarm Generation Assets (PD1-010), submitted at Procedural Deadline A on 15 October 2024.</p> <p>The figures referenced have been updated and are included within Appendix 11.2 Marine Mammal Information and Survey Data_Rev 02 (PD1-007) which was submitted at Procedural Deadline A.</p>