



SHEPHERD+ WEDDERBURN

SUMMARY OF DEADLINE 1 SUBMISSION ON BEHALF OF

(1) BARROW OFFSHORE WIND LIMITED (REF: 20049974) (2) BURBO EXTENSION LTD (REF: 20049975) (3) WALNEY EXTENSION LIMITED (REF: 20049977) (4) MORECAMBE WIND LIMITED (REF: 20049973) (5) WALNEY (UK) OFFSHORE WINDFARMS LIMITED (REF: 20049978) (6) ØRSTED BURBO (UK) LIMITED (REF: 20049976) (THE "ØRSTED IPs")

IN CONNECTION WITH THE Application by Morecambe Offshore Wind Limited for an Order Granting Development Consent for the Morecambe Offshore Windfarm Generation Assets

## 1. Introduction

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- 1.1 This document is provided on behalf of the Ørsted IPs<sup>1</sup> in accordance with DL1 of the examination the application by Morecambe Offshore Windfarm Limited (the “**Applicant**”) for an Order granting Development Consent for the Morecambe Offshore Windfarm Generation Assets (the “**Project**”).
- 1.2 This document provides a summary of the Ørsted IPs’ submissions on wake loss, which have been provided in response ISH1 action point 8 [EV3-009].<sup>2</sup>
- 1.3 We represent six owners of operational offshore windfarms in the East Irish Sea (as set out relevant representations), who we refer to together as the “**Ørsted IPs**” for the purposes of this written representation.

## 2. Summary of submission

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- 2.1 The Applicant is required to undertake a wake loss assessment by the National Policy Statement for Renewable Energy Infrastructure (as an effect on existing operational infrastructure) and Infrastructure Planning (Environmental Impact Assessment) Regulations 2017. The Applicant has failed to engage with the Ørsted IPs on this issue as required by the NPS-EN3.
- 2.2 If such an assessment is not undertaken the examining authority and Secretary of State will not be in a position to understand the effects of the Project, or to carry out decision making in accordance with the relevant policy and legal requirements.
- 2.3 Wake loss is an effect which can be accurately and robustly assessed. This is supported by a range of academic research and the existence of specialist consultants who regularly undertake such assessments.

**Shepherd & Wedderburn LLP**

**26.11.2024**

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<sup>1</sup> RR-008, RR-014, RR-056, RR-088, RR-089, RR-093.

<sup>2</sup> This summary has been provided as the submission exceeds 1500 words.