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The Planning Inspectorate
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Date: 11 December 2024
Our Ref: GIBSONJU\327721-000007
Direct: [REDACTED]
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Dear Mr Jackson

**Morecambe Offshore Windfarm Generation Assets Development Consent Order
Application Planning Inspectorate Reference: EN010121**

We are instructed by Spirit Energy (**Spirit**) in relation to the proposed development consent order application (the **Application**) made by Morecambe Offshore Windfarm Ltd (the **Applicant**) for the proposed Morecambe Offshore Windfarm Generation Assets (the **Project**). 'Spirit Energy' is the trading name used by Spirit Energy Limited and its subsidiaries, including Spirit Energy Production UK Limited, a group which collectively conducts European oil and gas operations.

Spirit has reviewed the submissions made by the Applicant at Deadline 1 of the Examination Timetable under the Rule 8 Letter from the Examining Authority dated 30 October 2024 [**PD-010**]. This letter set out Spirit's position at Deadline 2 including comments on the Deadline 1 submissions.

Spirit's Position

Spirit reserves its position as detailed in its Written Representation [**REP1-116**].

Statement of Common Ground

At the time of this submission, Spirit has provided updates to the Statement of Common Ground which the Applicant is due to submit as a joint statement by the Applicant and Spirit at Deadline 2.

Deadline 1 Submissions

At this stage, there are two matters relating to the Deadline 1 submissions that Spirit wishes to bring to the attention of the Examining Authority.

1. Timeline for Development of the Project

Spirit notes that in the Applicant's Response to Actions arising from Preliminary Meeting and Issue Specific Hearing 1 [**REP1-086**], the Applicant has provided a 'realistic expected scenario' timeline for delivery of the Project at Plate 3.1. This optimistic timeline (relative to the 'delayed scenario' provided at Plate 3.2) indicates that the wind turbines required for the Project will be installed starting Q2 2029.

The Applicant had previously indicated that construction of the Project would take place in an earlier period. The updated timeline is now likely to overlap more significantly with activities

in respect of Spirit's Morecambe Net Zero project and decommissioning. The Applicant has not consulted Spirit on this change to the Project and consequent impacts.

2. IFR Buffer Distance

Figure 7.2 "Proposed Buffers from Relevant Representations" enclosed at electronic page 43 of the Response to Actions arising from Preliminary Meeting and Issue Specific Hearing 1 [REP1-086] identifies a 3.3nm buffer around the South Morecambe CPP1. Spirit refers to and reserves its position as set out in paragraphs 2.9-2.22 of its Written Representation [REP1-116], requiring a buffer of at least 3.9nm.

Spirit will review and comment on the Deadline 2 submissions in due course and provide its response at Deadline 3.

Yours sincerely

Eversheds Sutherland (International) LLP

11 December 2024