



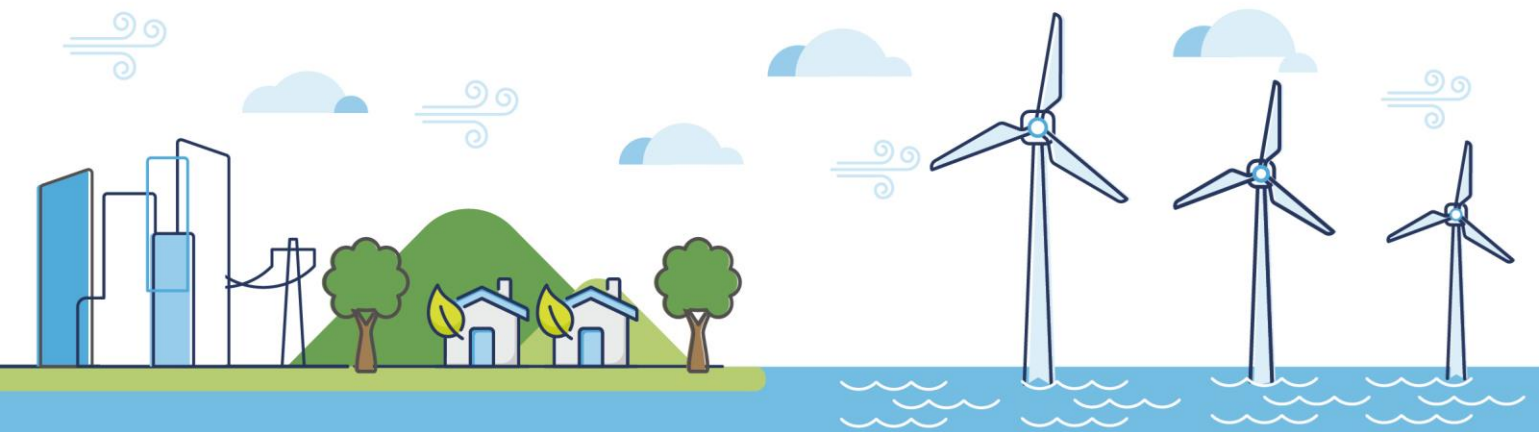
Morecambe Offshore Windfarm: Generation Assets Examination Documents

Volume 9

Draft Statement of Common Ground with Natural Resources Wales

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Glossary of Acronyms

AfL	Agreement for Lease
CEA	Cumulative Effects Assessment
DCO	Development Consent Order
EIA	Environmental Impact Assessment
ES	Environmental Statement
GBBG	Great Black Backed Gull
HRA	Habitat Regulations Assessment
LSE	Likely Significant Effects
MMMP	Marine Mammal Mitigation Protocol
NRW	Natural Resources Wales
OSP	Offshore substation platform
PEIR	Preliminary Environmental Information Report
RIAA	Report to Inform Appropriate Assessment
SAC	Special Areas of Conservation
SoCG	Statement of Common Ground
UK	United Kingdom
UWSMS	Underwater Sound Management Strategy
WTG	Wind turbine generator

Glossary of Unit Terms

km ²	square kilometre
MW	Megawatt

Glossary of Terminology

Agreement for Lease (AFL)	Agreements under which seabed rights are awarded following the completion of The Crown Estate tender process.
Applicant	Morecambe Offshore Windfarm Ltd
Application	This refers to the Applicant's application for a Development Consent Order (DCO). An application consists of a series of documents and plans which are published on the Planning Inspectorate's (PINS) website.
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 (WTGs), inter-array cables, offshore substation platform(s) (OSP(s)) and possible platform link cables to connect OSP(s).
The Planning Inspectorate	The agency responsible for operating the planning process for Nationally Significant Infrastructure Projects
Windfarm site	The area within which the WTGs, inter-array cables, OSP(s) and platform link cables would be present.



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1 Introduction

1.1 Project Overview

1. The Morecambe Offshore Windfarm is a proposed offshore windfarm located in the Eastern Irish Sea, which when fully operational, would have an anticipated nominal capacity of 480 megawatts (MW) and would have the potential to generate renewable power for over 500,000 homes in the United Kingdom (UK).
2. The windfarm was one of six projects selected by The Crown Estate in its Offshore Wind Leasing Round 4 in 2021. The Agreement for Lease (AfL) for the windfarm was received in 2023.
3. The AfL comprises an area of up to 125km² and reflects the windfarm site assessed in the Preliminary Environmental Information Report (PEIR). Following design development, surveys, assessments and consultation on the PEIR, the proposed windfarm site development area has been reduced to approximately 87km².
4. The 'Project' relates to the Generation Assets of the Morecambe Offshore Windfarm (including wind turbine generators (WTGs), inter-array cables, offshore substation platforms (OSP(s)), and possible platform link cables to connect OSP(s)).
5. A separate consent for the Transmission Assets associated with the Morecambe Offshore Windfarm and the Morgan Offshore Wind Project (another proposed windfarm to be located in the Irish Sea) is being sought.

1.2 Purpose of this document

6. This draft Statement of Common Ground (SoCG) has been jointly prepared by Morecambe Offshore Windfarm Ltd (the Applicant) and Natural Resources Wales Advisory (NRW (A)). This identifies topic areas where there is agreement, areas of disagreement (material and non material), and areas which remain under discussion in relation to the Development Consent Order (DCO) application for the Morecambe Offshore Windfarm Generation Assets (hereafter 'the Project').
7. The need for a SoCG between the Applicant and NRW (A) is set out in Appendix G of the Rule 6 letter issued by the Planning Inspectorate on 23 September 2024.

1.3 The role of NRW (A) in respect of this SoCG

8. In addition to being an interested party under the Planning Act 2008, NRW exercises functions under legislation including (but not limited to) the

Environmental Permitting (England and Wales) Regulations 2016 (as amended), the Marine and Coastal Access Act 2009 and the Conservation of Habitats and Species Regulations 2017.

9. NRW broadly has two main functions in relation to marine development:
 - As a Marine Licensing authority (acting on behalf of the Welsh Ministers)
 - As an advisor and statutory consultee
10. For the avoidance of doubt, this SoCG relates solely to NRW's advice in its capacity as a statutory consultee and advisor.

1.4 Methodology

11. This draft SoCG has been structured to reflect topics and documents (**Table 1.1**) of the Application which are of key interest to NRW (A). These topics are covered within DCO documentation including but not limited to the Environmental Statement (ES) and the Report to Inform Appropriate Assessment (RIAA) as well as other associated DCO documents.
12. The Project relates only to the Generation Assets of the Morecambe Offshore Windfarm (including wind turbine generators (WTGs), inter-array cables, offshore substation platforms (OSPs), and possible platform link cables to connect offshore substations). A separate consent for the Transmission Assets associated with the Morecambe Offshore Windfarm and the Morgan Offshore Wind Project (another proposed windfarm to be located in the Irish Sea) will be sought.

Table 1.1 Topics included in the draft SoCG

Topic/chapter	Document reference
Draft Development Consent Order (DCO)	APP-012
Chapter 11 Marine Mammals	APP-048
Chapter 12 Offshore Ornithology	APP-049
Draft Marine Mammal Mitigation Protocol (MMMP)	APP-149
In-Principle Monitoring Plan (IPMP)	APP-148
Report to Inform Appropriate Assessment (RIAA)	APP-027
Underwater Sound Management Strategy (UWSMS)	REP2-026

13. It is agreed that the focus of input from NRW (A) will be only in regard to mobile species and cumulative effects for Marine Mammals and Offshore

Ornithology. Therefore, the following topics have not been included in this SoCG:

- Physical processes
- Benthic ecology
- Water and sediment quality
- Fish and shellfish ecology

14. Throughout the draft SoCG, as detailed in **Table 1.2**, the phrase “Agreed” identifies any point of agreement between the Applicant and NRW (A). The phrase “Not Agreed” identifies any point that is not agreed between the Applicant and NRW (A). Matters that are not yet agreed will be the subject of ongoing discussion between the Applicant and NRW (A) to reach agreement on each matter wherever possible or refine the extent of disagreement between parties.
15. Topic specific matters agreed and not agreed, as well as those that remain under discussion between the Applicant and NRW (A), are included within this draft SoCG.

1.4.1 Summary of ‘Agreed’, ‘Not Agreed’ and ‘In Discussion’ matters

16. In order to easily identify whether a matter is ‘agreed’, ‘not agreed’ or ‘in discussion’, the colour coding system set out in **Table 1.2** has been used.
17. Details on specific matters that are ‘agreed’, ‘not agreed’ or ‘in discussion’ between the Applicant and NRW (A) are presented in **Table 2.2**, as relevant to the different topics covered.

Table 1.2 Summary of ‘Agreed’, ‘Not Agreed’ and ‘In Discussion’ matters

Position status	Position colour coding
Agreed The matter is considered to be agreed between the parties.	Agreed
	Agreed with residual concerns/caveats
Not Agreed – no material impact The matter is not agreed between the parties but is not considered to be material. For example the matter is not agreed, however, the outcome of the approach taken by either party does not result in a material impact on the assessment or assessment conclusions in Environmental Impact Assessment (EIA) or Habitat Regulations Assessment (HRA) terms.	Not Agreed – no material impact
Not Agreed – material impact	Not Agreed – material impact

Position status	Position colour coding
The matter is not agreed between. The outcome of the approach taken by either party is considered to result in a material impact on the assessment or assessment conclusions in EIA or HRA terms.	
In Discussion The matter is neither 'agreed' nor 'not agreed' and is a matter where further discussion is required between the parties. For example where additional clarity is being sought.	In Discussion

2 Statement of Common Ground

18. The Applicant has engaged with NRW (A) on the Project during the pre-application process and post-application, both in terms of informal non-statutory engagement and statutory consultation carried out, pursuant to Section 42 of the Planning Act 2008. Full details of pre-application consultation for the Project are provided in the Consultation Report (APP015).
19. Following the submission of the Application, regular meetings have continued. NRW (A) provided a high level Relevant Representation (RR-062) in August 2024 and a more detailed Written Representation in November 2024 (REP1-099) that has been used to populate this draft SoCG.
20. A summary of the consultation undertaken to date with NRW (A) is set out in **Table 2.1**.
21. Thereafter, **Table 2.2** sets out the topics agreed, in discussion or not agreed with NRW (A) as informed by the consultation and information exchanged between the Applicant and NRW (A).

Table 2.1 Summary of consultation with NRW (A)

Date	Contact type	Owner	Topic
Pre-application			
May 2023	Preliminary Environmental Information Report (PEIR) provided for comments	Applicant	PEIR provided under Section 42 of the Planning Act 2008
June 2023	Document with comments on the PEIR	Natural Resource Wales (NRW) (A)	Comments provided under Section 42 of the Planning Act 2008
15 February 2024	Document with comments on the PEIR	Applicant	Response to NRW (A) on PEIR comments

Date	Contact type	Owner	Topic
14 March 2024	Written submission	NRW (A)	Reply to responses on Section 42 comments
29 April 2024	Online Meeting	Applicant	Discussion on the Project, any outstanding comments and the Statement of Common Ground (SoCG)
Post-application submission			
09 July 2024	Online Meeting	Applicant	Project update meeting
21 August 2024	Online Meeting	Applicant	Discussions on SoCG template
04 December 2024	Online Meeting	Applicant	Discussions on SoCG and written representations
11 February 2025	Online Meeting	Applicant	Discussions on SoCG and written representations

Table 2.2 Topics agreed, in discussion or not agreed with NRW (A)

Topic/ref.	Discussion Point	Applicant's position	NRW (A) position	Position summary
Marine Mammals EIA				
NRW – MM1	The Applicant and Natural Resource Wales (NRW) are in discussion on matters relating to Marine Mammals and NRW are working on their position which will be reviewed following Deadline 4 submissions.			
Ornithology EIA				
NRW – OO1	Consultation	The Applicant has undertaken adequate consultation with NRW (A) on potential ornithological impacts.	NRW (A) notes that further engagement by the Applicant during the pre examination period would have been beneficial.	Not Agreed – No material impact
NRW – OO2	Consultation	The Environmental Impact assessment (EIA) has had due regard to matters raised by NRW (A) through statutory and non-statutory consultation on potential ornithological impacts.	NRW (A) note that as the Morecambe Generation Assets project is located wholly in English waters, NRW (A)'s primary area of interest for offshore ornithology for this project is on impacts to Welsh designated sites. NRW (A) raised the need for a quantitative assessment of impacts to the features of the Pen y Gogarth/Great Orme's Head SSSI in our comments on the project's Preliminary Environmental Information Report (PEIR) and unfortunately the Applicant did not undertake this in the submission. However, the Applicant has now undertaken this assessment in their Deadline 3 submission (Offshore Ornithology Technical Note 1 (EIA), Revision 02 [REP3-056]). We welcome the additional work undertaken by the Applicant on this issue. However, we	Not Agreed – No material impact

Topic/ref.	Discussion Point	Applicant's position	NRW (A) position	Position summary
			have some concerns regarding the approaches taken, particularly regarding age-class apportioning in the breeding season (please see our detailed comments on this in our Deadline 4 response for details).	
NRW – OO3	Policy and planning	The Application has identified and considered the plans and policies relevant to ornithology, within NRW (A)'s remit.	NRW (A) agrees that the Application has identified and considered the plans and policies relevant to ornithology within our remit.	Agreed
NRW – OO4	Baseline environment	The Applicant has characterised the baseline environment appropriately and undertaken appropriate digital aerial surveys	NRW (A) agrees with the data collected through surveys and literature	Agreed
NRW – OO5	Scoping	The appropriate impacts have been screened into the EIA for ornithology	NRW (A) agrees with the scoping of impacts for the EIA for ornithology.	Agreed
NRW – OO6	Study area	The EIA study area is appropriate for the receptors and impacts assessed.	NRW (A) agrees with the study area used for the EIA for ornithology.	Agreed
NRW – OO7	Worst case scenario	The EIA chapter has identified, described and assessed the maximum design scenario for the EIA.	NRW (A) agrees that the maximum design scenario has been identified, described, and assessed for the EIA.	Agreed
NRW – OO8	Assessment methodology – Project alone	The EIA methodology used by the Applicant is appropriate to assess the Project alone significance of effects. The Applicant has provided an updated EIA technical note to address NRW (A) Written Representations at Deadline 3 (REP3-056). No changes to the	In our Written Representations [REP1-099], NRW (A) noted inconsistencies/errors in the months assigned to each season for gannet and Manx shearwater and hence in the mean seasonal peak abundances used in the displacement assessments. These could have implications for the	In Discussion

Topic/ref.	Discussion Point	Applicant's position	NRW (A) position	Position summary
		<p>conclusions were identified and it is the intention up make the updates in the ES for Deadline 5.</p> <p>In regards to displacement assessments of the guillemot and razorbill features of the Pen y Gogarth/Great Orme's Head SSSI, the Applicant can address any further comments received by NRW at Deadline 4 in the Deadline 5 update of the EIA chapter.</p>	<p>apportioned impacts to designated sites for these features. The Applicant has corrected the EIA scale gannet abundances in PD1-010 and the Manx shearwater EIA abundances in RE3-056. Therefore, these issues are resolved. However, we would advise that the updated abundances and assessments should be included in an updated version of the ES chapter that should be submitted into the examination.</p> <p>In our Written Representations [REP1-099], we advised that displacement assessments of the guillemot and razorbill features of the Pen y Gogarth/Great Orme's Head SSSI should consider the apportioned impacts across the range of NRW (A) advised percentage displacement and percentage mortality rates as well as the Applicant's preferred rates. Whilst we welcome that the Applicant has presented the impacts across the range in their assessment in REP3-056, we note that their assessment and PVAs have only be run on the Applicant's preferred range of rates (see our Deadline 4 response for more details)</p>	
NRW – OO9	Assessment conclusions – Project alone	No significant effects on ornithology have been identified for the Project alone.	As the Morecambe Generation Assets project is located wholly in English waters, NRW's primary area of interest	In Discussion

Topic/ref.	Discussion Point	Applicant's position	NRW (A) position	Position summary
		<p>The Applicant has provided an updated EIA technical note (REP3-056) to address NRW (A) Written Representations.</p> <p>With regard to displacement assessments of the guillemot and razorbill features of the Pen y Gogarth/Great Orme's Head SSSI, the Applicant can address any further comments received by NRW at Deadline 4 in the Deadline 5 update of the EIA chapter.</p>	<p>for offshore ornithology for this project is on impacts to Welsh designated sites, namely SPAs (covered under HRA) and SSSIs (covered under EIA). With regard to EIA scale impacts from the project alone, we defer advice to Natural England (NE), with the exception of impacts to Welsh SSSIs. The Applicant has undertaken a quantitative assessment of impacts to the features of the Pen y Gogarth/Great Orme's Head SSSI in REP3-056. We can agree that there would be no significant adverse effect on the kittiwake feature of the site from the project alone. However, whilst we welcome that the Applicant has presented the guillemot and razorbill displacement impacts across the range of advised percentage displacement and percentage mortality rates in their assessment in REP3-056, we note that their assessment and PVAs have only be run on the Applicant's preferred rates. Therefore, at present we are unable to reach a conclusion on the level of significance of impacts from the project alone for these features (see our Deadline 4 response for more details).</p>	
NRW – OO10	Assessment methodology – Cumulative	The EIA methodology used by the Applicant is appropriate to assess the cumulative significance of effects.	In our Written Representations [REP1-099], NRW raised concerns with the number of gaps in the cumulative	In Discussion

Topic/ref.	Discussion Point	Applicant's position	NRW (A) position	Position summary
		<p>The Applicant extended the cumulative assessment at Deadline 1, providing the additional gap filling work for historical projects (REP1-080).</p> <p>The Applicant has provided an updated EIA technical note to further address NRW (A) Written Representations, this included a cumulative assessment for the features of the Pen y Gogarth/Great Orme's Head SSSI (REP3-056).</p> <p>With regard to displacement assessments of the guillemot and razorbill features of the Pen y Gogarth/Great Orme's Head SSSI, the Applicant can address any further comments received by NRW at Deadline 4 in the Deadline 5 update of the EIA chapter.</p>	<p>assessments, which fed through to the in-combination assessments to Welsh SPAs. We also advised that a cumulative assessment was undertaken for impacts to the Pen y Gogarth/Great Orme's Head SSSI.</p> <p>The Applicant has undertaken a 'gap fill' exercise for historic projects included in the cumulative assessments at Deadline 1 [REP1-080], which NRW welcomes, although would advise that the updated abundances and assessments should be included in an updated version of the ES chapter that should be submitted into the examination.</p> <p>The Applicant has also undertaken cumulative assessments for the features of the Pen y Gogarth/Great Orme's Head SSSI in REP3-056. However, NRW have some concerns regarding the approaches taken to apportionment of impacts to the projects included in the cumulative assessment (see our Deadline 4 response for more details).</p>	
NRW – OO11	Assessment conclusions – Cumulative	<p>No significant cumulative effects have been identified for the Project in respect of Welsh SSSI sites.</p> <p>The Applicant has provided an updated EIA technical note (REP3-056) to address NRW (A) Written</p>	<p>As the Morecambe Generation Assets project is located wholly in English waters, NRW (A)'s primary area of interest for offshore ornithology for this project is on impacts to Welsh designated sites, namely SPAs (covered under HRA) and SSSIs</p>	In Discussion

Topic/ref.	Discussion Point	Applicant's position	NRW (A) position	Position summary
		<p>Representations, this included a cumulative assessment for the features of the Pen y Gogarth/Great Orme's Head SSSI.</p> <p>With regard to displacement assessments of the guillemot and razorbill features of the Pen y Gogarth/Great Orme's Head SSSI, the Applicant can address any further comments received by NRW at Deadline 4 in the Deadline 5 update of the EIA chapter.</p>	<p>(covered under EIA). With regard to EIA scale cumulative impacts we defer advice to NE, with the exception of impacts to Welsh SSSIs.</p> <p>Whilst the Applicant has undertaken a quantitative assessment of cumulative impacts to the features of the Pen y Gogarth/Great Orme's Head SSSI in REP3-056, have concerns regarding the approach taken to apportioning impacts to the various projects. Hence, at present we are unable to reach a conclusion on the level of significance of cumulative impacts for all features of the SSSI (see our Deadline 4 response for more details).</p>	
Ornithology HRA				
NRW – OO13	Screening	The appropriate impacts have been screened into the HRA for ornithology.	NRW (A) agrees with the list of potential effects scoped in for LSE and the list of SPAs/Ramsar sites scoped in for the assessment.	Agreed
NRW – OO14	Assessment methodology	All European sites with ornithological features with the potential for LSE have been identified within the HRA Stage 1 screening and considered in the Stage 2 RIAA.		Agreed
NRW – OO15	Assessment methodology	The approach used for determining LSE on European sites with ornithological features is appropriate, and all the relevant sites have been identified.		Agreed

Topic/ref.	Discussion Point	Applicant's position	NRW (A) position	Position summary
NRW – OO16	Outcomes of the RIAA (Project alone)	<p>There will be no adverse effects on integrity for Welsh SPAs designated for ornithological features for any impacts for the Project alone.</p> <p>The Applicant has provided an updated HRA technical note (REP3-058) to further address NRW (A) Written Representations.</p> <p>It is intended that an updated RIAA will be submitted at Deadline 4 and then again at 5 if required.</p>	<p>Following the Applicant's updated displacement assessments for Manx shearwater and gannet Welsh SPAs presented in REP3-058 to account for the errors in seasonal mean peak abundances, NRW (A) agrees that there will be no adverse effect on site integrity (AEoSI) for marine ornithology features of Welsh SPAs from the project alone (see our Deadline 1 advice, REP1-099 and our Deadline 4 advice for details). However, we would advise that the updated apportioned abundances and assessments should be included in an updated version of the RIAA that should be submitted into the examination.</p> <p>Please note that with regard to the features of the Liverpool Bay SPA, we defer advice to NE.</p>	Agreed – with caveats (deferral on Liverpool Bay SPA to NE)
NRW – OO17	Outcomes of the RIAA (in-combination with other plans and projects)	<p>There will be no adverse effects on integrity for Welsh SPAs designated for ornithological features for any impacts for the project in-combination with other projects and plans.</p> <p>The Applicant provided gap filling for historical projects at Deadline 1 (REP1-081).</p> <p>The Applicant has provided an updated HRA technical note (REP3-058) to further address NRW (A) Written Representations.</p>	<p>The Applicant has undertaken updated in-combination assessments for Welsh Manx shearwater SPAs (Skomer, Skokholm and seas off Pembrokeshire SPA and Aberdaron Coast and Bardsey Island SPA) in REP3-058, which includes the gap-filled historic projects. Whilst NRW (A) welcome the work undertaken by the Applicant, we have concerns regarding the approach taken to apportion impacts from the wind farm projects to the SPAs and that it risks underestimating the</p>	In Discussion

Topic/ref.	Discussion Point	Applicant's position	NRW (A) position	Position summary
		<p>It is intended that an updated RIAA will be submitted at Deadline 4 and then again at 5 if required.</p>	<p>impacts. Additionally, the Applicant has not considered the advised full ranges of % displacement and % mortality rates or run PVAs on the worst case scenarios where these exceed 1% of baseline mortality (see our Deadline 4 response for details). Additionally, as noted in our Deadline 3 response [REP3-094], the Applicant has not updated the in-combination assessments for the other Welsh SPA and feature combinations that were taken through to in-combination assessment in the RIAA [REP1-012, updated version] – namely lesser black-backed gull, assemblage named components guillemot and razorbill for Skomer, Skokholm and seas off Pembrokeshire SPA. Therefore, at present we are unable to reach conclusions on in-combination impacts for these sites and features.</p> <p>Following the updates to the Grassholm SPA gannet assessment in REP3-058, we are however, able to agree that there would be no AEoSI for this feature of this site for in-combination impacts (see our Deadline 4 response for details).</p> <p>Please note that with regard to the features of the Liverpool Bay SPA, we defer advice to NE.</p>	

3 Signatures

22. The above draft SoCG is agreed between NRW (A) and the Applicant on the day specified below.

Signed:	
Print Name:	
Job Title:	
Date:	
Duly authorised for and on behalf of the Natural Resource Wales (NRW) (A)	
Signed:	
Print Name:	
Job Title:	
Date:	
Duly authorised for and on behalf of the Applicant	

4 References

DESNZ (2024) Overarching National Policy Statement for Energy (EN-1)

DESNZ (2024) Overarching National Policy Statement for Renewable Energy Infrastructure (EN-3)

Morecambe Offshore Windfarm Ltd (2024) Consultation Report (APP-015)

Morecambe Offshore Windfarm Ltd (2024) Draft DCO (APP-012)

Morecambe Offshore Windfarm Ltd (2024) Chapter 11 Marine Mammals (APP-048)

Morecambe Offshore Windfarm Ltd (2024) Chapter 12 Offshore Ornithology (APP-049)

Morecambe Offshore Windfarm Ltd (2024) Chapter 12 Offshore Ornithology (APP-049)

Morecambe Offshore Windfarm Ltd (2024) In-Principle Monitoring Plan (APP-148)

Morecambe Offshore Windfarm Ltd (2024) Draft Marine Mammal Mitigation Protocol (APP-149)

Morecambe Offshore Windfarm Ltd (2024) Report to Inform Appropriate Assessment (APP-027)