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Morecambe Offshore Windfarm Generation Assets Case Team
Planning Inspectorate
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(Email only)

MMO Reference: DCO/2022/00001
Planning Inspectorate Reference: EN010121
Identification Number: [REDACTED]

19 November 2025

Dear Ben Million,

Planning Act 2008, Floatation Energy, Proposed Morecambe Offshore Windfarm Generation Assets Order

Secretary of State (SoS) Request For Information Submission

On 27 June 2024 the MMO received notice under Section 56 of the Planning Act 2008 (the PA 2008) that the Planning Inspectorate (PINS) had accepted an application made by Morecambe Offshore Windfarm (the Applicant) for determination of a development consent order (DCO) for the construction, maintenance and operation of the proposed Morecambe Offshore Windfarm (the DCO Application) (MMO ref: DCO/2022/00001 PINS ref: EN010121).

The DCO Application seeks authorisation for the construction, operation and maintenance of Morecambe Offshore Windfarm Generation Assets, located approximately 30 kilometres (km) from the Lancashire Coast, England. The windfarm Agreement for Lease area awarded by The Crown Estate spans 125 km squared (km²). The proposed windfarm site development area has been reduced to approximately 87km². All project infrastructure will be located within the 87km² windfarm site. The project consists of up to 35 Wind Turbine Generators (WTG), up to two Offshore substations (OST), their associated foundations and platform link cables. Inter-array cables. Scour protection around foundations and subsea cable protection where required.

One Deemed Marine Licence (DML) is included in the draft DCO. The DML relates to Offshore (WTG) and Associated Infrastructure and Associated Development.

As a marine licence has been deemed within the draft DCO, the MMO is the delivery body responsible for post-consent monitoring, variation, enforcement, and revocation of provisions relating to the marine environment. As such, the MMO has an interest in ensuring that provisions drafted in a deemed marine licence enable the MMO to fulfil these obligations.

This document comprises the MMO's comments to the SoS request for information dated 22 October 2025.

This written representation is submitted without prejudice to any future representation the MMO may make about the DCO Application. This representation is also submitted without prejudice to any decision the MMO may make on any associated application for consent, permission, approval or any other type of authorisation submitted to the MMO either for the works in the marine area or for any other authorisation relevant to the proposed development.

Yours sincerely,

[Redacted signature]

[Redacted name]
Marine Licensing Case Manager

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1. Secretary of State's Request for Further Information

- 1.1. On the 22 October 2025, the MMO received a letter from the SoS requesting further information to assist in reaching determination.

The Secretary of State invites all interested parties to comment on the information provided in response to his information request of 26 September 2025.

- 1.2. The MMO has reviewed all documents and provided comments were required below.

2. C3-003A – Compliance with the mitigation hierarchy in respect of kittiwake

- 2.1. The MMO has reviewed the Applicant's response to the SoS comments relating to the mitigation hierarchy and Kittiwake. The MMO understands the positions from interested parties, in particular the conclusion that compensation would not be proportionate or required which has been supported by Natural Resource Wales's (NRW) response in REP6-053.
- 2.2. The MMO does not have any comments in relation to mitigation hierarchy in respect of kittiwake and defers to Natural England for ornithology matters.
- 2.3. The MMO notes the Applicant has suggested 2 options should compensation be required. One is the inclusion of a condition on the DML to secure compensation for Kittiwake and the other is within Schedule 2 requirements. The MMO strongly believes that any compensation is a matter for the SoS to decide and therefore a condition should not be included within the DML for the MMO to then have to manage at the post consent stage. The condition proposed is not enforceable and therefore does not meet the five tests for securing conditions due to the wording 'as far as possible'.
- 2.4. The MMO notes for other compensation a new Schedule is created as part of the DCO for the SoS to discharge post consent based on the impacts. The MMO does not agree with this condition or the inclusions of a compensation condition within the DML.

3. C3-003B - Cumulative Effects Assessment

- 3.1. The MMO does not have any comments and defers to Natural England for ornithology matters in relation to potential cumulative effects.

Yours sincerely,

[Redacted Signature]

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