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Dyddiad/Date: 20/11/2025

Er sylw / For the attention of:

Ben Million
Co-Head of Energy Infrastructure Planning
On behalf of the Secretary of State for Energy Security and Net Zero

Annwyl / Dear Ben,

**PLANNING ACT 2008 AND THE INFRASTRUCTURE PLANNING (EXAMINATION
PROCEDURE) RULES 2010**

**APPLICATION BY MORECAMBE OFFSHORE WINDFARM LIMITED ("THE
APPLICANT") FOR AN ORDER GRANTING DEVELOPMENT CONSENT FOR THE
PROPOSED MORECAMBE OFFSHORE WINDFARM PROJECT: GENERATION
ASSETS ("THE PROPOSED DEVELOPMENT")**

**ASSETSCYFEIRNOD YR AROLYGIAETH GYNLLUNIO / PLANNING INSPECTORATE
REFERECE: EN010121**

EIN CYFEIRNOD / OUR REFERENCE: [REDACTED]

REQUEST FOR INFORMATION

Thank you for your Information Request Letter, dated 22nd October 2025, requesting comments from various parties regarding the submissions of the prior information request of 26th September 2025.

The following NRW (A) comments are provided with respect to The Applicant's Response to Secretary of State Letter and Request for Information (Consultation 3) regarding Pen y Gogarth/Great Orme's Head SSSI kittiwake

From the Morecambe Environmental Impact Assessment (EIA), the Applicant's apportioned predicted annual collision impacts for kittiwake from the Great Orme's Head SSSI colony was a total of 0.8 mortalities per annum, which were all predicted to occur during the breeding season (see Table 12.92 of [REP6-009](#)). We note that the RSPB hotspot mapping and utilisation distribution mapping data (covers guillemot, razorbill, kittiwake and shag, which can be downloaded via <https://opendata-rspb.opendata.arcgis.com/>) suggests that the Morecambe Generation Assets project area is not located in a core area (i.e. within the 50% utilisation distribution contour) utilised by kittiwake from the SSSI colony – the proposed project lies within the 85-90% kittiwake utilisation distribution contours, suggesting that whilst the projects does sit within the overall range, it is located within a less frequently used area and does not sit within the core range. Therefore, the 0.8 kittiwake mortalities per year from the SSSI colony predicted by the project is in our view likely to be overly precautionary.

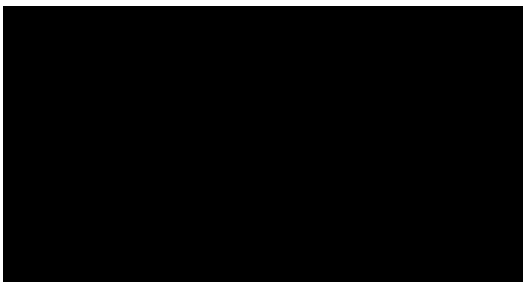
The Applicant has committed to mitigation through raising turbine draft height to 25m above Highest Astronomical Tide (HAT) (see Environmental Statement - Volume 5 - Appendix 12.1 - Offshore Ornithology Technical Report Table 2.1, [APP-070](#)). We note that in theory the Applicant could consider further mitigation via additional increases to turbine draft height to further reduce predicted collisions. However, given the very low numbers of kittiwake collisions predicted for the SSSI colony, the overall benefit from increasing the air gap (by further altering the draft turbine height) would be minor, particularly when considered in the context of cumulative impacts, and would be unlikely to affect the outcome of the assessment.

Given the above, we consider that a requirement for the Applicant to provide compensation for their precautionary impact to the kittiwake population of the SSSI would be disproportionate in this case.

Please note that our comments are made without prejudice to any further comments we may wish to make in relation to this Application whether in relation to the Environmental Statement (ES) and associated documents, provisions of the draft Development Consent Order ('DCO') and its Requirements, or other evidence and documents provided by Morecambe Offshore Windfarm Limited ("the Applicant"), the Secretary of State Secretary of State for Energy Security and Net Zero, or other Interested Parties.

Please do not hesitate to contact [REDACTED] [REDACTED]
[REDACTED]@cyfoethnaturiolcymru.gov.uk and [REDACTED] [REDACTED]

██████████@cyfoethnaturiolcymru.gov.uk should you require further advice or information regarding the above.



Yn gywir / Yours sincerely,

██████████

Team Leader, Marine Sustainable Management
Natural Resources Wales

On Behalf of

██████████

Marine Services Manager
Natural Resources Wales