



THE PLANNING ACT 2008

THE INFRASTRUCTURE PLANNING (EXAMINATION PROCEDURE) RULES  
2010

MORECAMBE GENERATION OFFSHORE WIND FARM

**Appendix D1 to Natural England's Deadline 3 Submission**

**Natural England's Comments on Marine Mammals**

For:

The construction and operation of Morecambe Generation Offshore Wind Farm, located approximately 30 km from the Northwest English Coast in the Irish Sea.

Planning Inspectorate Reference EN010121

## Morecambe Generation Deadline 3 Marine Mammal Specialist Comments

### 1. Minor comments

In formulating these comments, the following documents have been considered:

- REP2-026 9.32 Outline Underwater Sound Management Strategy – Revision 02 (Volume 9) (UWSMS)
- REP2-023 6.9.1 Outline Vessel Traffic Management Plan – Revision 02 (Volume 6) (VTMP)
- REP2-019 6.5.1 Draft Marine Mammal Mitigation Protocol – Revision 02 (Volume 6) (MMMP)
- REP2-017 5.5.1 Schedule of Mitigation – Revision 02 (Volume 5)
- REP2-021 6.6.1 Offshore Operations and Management Plan – Revision 02 (Volume 6) (OOMP)

**Table 1: Natural England's advice on: Marine Mammals**

Document reviewed	Update made	Issue resolved?
UWSMS	We welcome The Applicant's proposal to limit piling activity on days where UXO clearance is being carried out, to reduce area of effect for species displacement. Natural England advises that in order to fully resolve this issue more information is required regarding what is going to be limited, and in what way, and how this will be secured as a commitment and conditioned.	In Progress
VTMP	Natural England is satisfied that The Applicant has included a code of conduct to mitigate the risk of collision with marine mammals in the VTMP, and in the Outline PEMP which will be conditioned in Schedule 6 of the DCO.	Resolved

## 2. Major/Complex comments

In formulating these comments, the following documents have been considered:

- REP2-026 9.32 Outline Underwater Sound Management Strategy - Revision 01 (Volume 9)

### 2.1. Summary

Natural England notes that the Outline Underwater Sound Management Strategy submitted by The Applicant at Deadline 2 does not address the need for additional mitigation measures. We reiterate that the UWSMS should contain a commitment to the use of Noise Abatement Systems to mitigate residual impacts.

Natural England draws the ExAs and Applicant's attention to the publication of [DEFRA's new measures to curb underwater noise and accelerate renewable energy](#) (21 January 2025). Once we have considered the documents in full, we will provide updated nature conservation advice, where appropriate, for this Application, at the next appropriate deadline.

### 2.2. Detailed comments - Longform

#### i) Sufficiency of mitigation measures

Natural England advises the mitigation measures proposed must be sufficient to mitigate for the project as it is consented. Additional design refinements confirmed post consent may reduce the overall impact of the project (and thus the level of mitigation actually needed), but this cannot be considered in the level of mitigation required for consent. The mitigation requirements must be based on current available evidence on the maximum design scenario and potential impacts i.e. the worst-case scenario. It is not clear that the current mitigation measures proposed will be adequate for the final consented project design.

#### ii) High strike rate scenario mitigation

The Applicant has stated that the Outline Underwater Sound Management Strategy would include information on the residual impacts to Harbour Porpoise resulting from the higher strike rate scenario, as our relevant reps state that the proposed mitigation is insufficient and further assessment of this residual impact is required to inform additional mitigation. The Applicant has not included an assessment of this residual impact in the UWSMS.

Natural England notes that the Applicant refers to potential refinements to the project design in the UWSMS, as well as potential mitigation which may be required depending on the final project design. We reiterate that as there is a residual impact to harbour porpoise under the higher strike rate scenario, further mitigation such as the use of Noise Abatement Systems is required and should be committed to at this stage. Furthermore, recently announced policy guidance indicates that the UK government will "*expect that all offshore wind pile driving activity across all English waters will be required to demonstrate that they have utilised best endeavours to deliver noise reductions through the use of primary and/or secondary noise reduction methods in the first instance*".