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Morecambe Offshore Windfarm Generation Assets Case Team
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(Email only)

MMO Reference: DCO/2022/00001
Planning Inspectorate Reference: EN010121
Identification Number: 20049449

11 March 2025

Dear Robert Jackson,

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

Deadline 5 Summary Submission

On 27 June 2024, the Marine Management Organisation (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 Ltd (the “Applicant”) for determination of a development consent order 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 Applicant seeks authorisation for the construction, operation and maintenance of Morecambe Offshore Generation Assets. The proposal is located 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.



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This written representation is submitted without prejudice to any future representation the MMO may make about the DCO Application throughout the Examination process. 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

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1. MMO Response to Examiners Questions 2 (ExQ2)

1.1 The MMO provided updates to the questions that were not answered at Deadline 4 (REP4-064).

1.2 The MMO does not consider a 56-day determination period for all consents within the DML appropriate.

2. Responses to Examiner's Questions 1 (ExQ1)

2.1 The MMO notes that a disposal site has now been designated.

2.2 The MMO notes that the Applicants worst-case scenario of 50% driven and 50% drilled has been considered to assess impacts of increases in suspended sediments from foundation installation. The assumptions regarding the release of contaminants seem reasonable.

2.3 The MMO highlights the Applicant should be mindful that the use of chemicals in the construction operation maintenance and decommissioning of the OWF not used on vessels or within closed systems and not requiring top up, will need to be notified to the regulator for approval as per comments in Section 7.

3. Comments on PD1-011 Applicant's response to Relevant Representations from Marine Management Organisation

3.1 RR-047-51 relates to the minimising of the release of grout/cement in the marine environment. The MMO is content this will be addressed as part of the conditioned Project Environmental Management Plan (PEMP) and Outline Construction Method Statement (CMS) to prevent excess grout/cement to the wider marine environment.

3.2 The MMO highlights that the Underwater Sound Management Sound Management Strategy (UWSMS) does not provide the necessary evidence to not require a piling restriction on the face of the DML (RR-047-58). However, the piling restriction of 15 February to 31 March inclusive, can be agreed.

4. Comments on The Applicants Response to Section 3 – 5 of REP3-085 (Table 2.2.)

4.1 The update to Condition 9 part (ii) and (v) regarding micro-siting on the draft Development Consent Order (REP4-002), aligns with previous discussions.

5. Comments on the Applicant's Deadline 3 Submissions

5.1 Comments on 6.4.1 In Principle Monitoring Plan (IPMP) – Revision 02 (Volume 6) (Tracked) (REP3-046)

5.1..1 The MMO does not have concerns to raise in relation to the IPMP regarding benthic ecology receptors.

5.1..2 The MMO welcomes the analysis of pre-construction geophysical surveys to identify any changes to the seabed features outlined in the Environmental Impact Assessment baseline characterisation.



5.2 Comments on 6.3.1 Outline Fisheries Liaison and Co-Existence Plan - Revision 02 (Volume 6) (Tracked) (REP3-044)

5.2..1 The MMO supports that commercial fisheries monitoring will now be included as part of the IPMP.

5.3 Comments on 9.42 The Applicant's Comments on Deadline 2 Submissions by Interested Parties - Revision 01 (Volume 9) (REP3-069)

5.3..1 The MMO maintained its request that a temporal restriction on piling activities during the cod spawning season is conditioned on the DML. With further evidence since this submission this is 15 February to 31 March inclusive.

5.3..2 The MMO notes the Applicant's interest in understanding whether similar piling restrictions were secured for Awel y Môr OWF. The MMO defers to Natural Resources Wales for further comment.

6. Comments on the Applicant's Deadline 4 Submissions

6.1..1 The MMO has provided responses to 9.51 The Applicant's Comments on Deadline 3 Submissions by Interested Parties - Revision 01 (Volume 9) (REP4-058) within table 3 and 4 of its Deadline 5 response.

6.1..2 In relation to The Applicant's Comments to Interested Parties Responses to ExQ1 - Revision 01 (Volume 9) (REP4-060), the MMO has provided updated response where required in Table 2 of this its Deadline 5 response.

7. Comments on the Draft DCO and DML

7.1 Transfer of the benefit of the order

7.1..1 The MMO strongly disagrees with the inclusion of Article 7 and provided more comments.

7.2 Force Majeure

7.2..1 The MMO's position is that this condition should be removed.

7.3 Marine Noise Registry

7.3..1 The MMO requests a minor update regarding timing to Condition 19.

7.4 Determination Dates

7.4..1 The MMO welcomes the update to all documents being submitted at six or four months with regards to the Design Plan, Construction Programme, Monitoring Plans, PEMP, Written Scheme of Investigation, Aids to Navigation Plan, Marine Mammal Mitigation Protocol, Vessel Traffic Management Plan, Fisheries Liaison and Co-Existence Plan, UWSMS, Outline Offshore Operation and Maintenance Plan.

7.4..2 The MMO still has outstanding comments on Condition 10(2).

7.5 Chemicals

7.5..1 The MMO requests that condition 7(1) is removed and updates are made to condition 10(1) regarding the chemical risk assessment.



7.5..2 The MMO provided further reasoning on this to create a revised consistent and thorough approach to chemical consenting for OWF.

7.6 Dropped Objects

7.6..1 The MMO is still in discussion with the Applicant on this matter.

7.7 Schedule 2 Requirements 1 Timescales/Lifespan

7.7..1 The MMO proposed a question to the ExA in relation to an end date being included on the DCO.

7.8 Adaptive management

7.8..1 The MMO has raised a new condition to be consistent across all wind farms although this is late in the examination so is unlikely to be discussed fully.

8. Comments on Deadline 4 Submissions from Other Stakeholders

8.1 Natural England (NE) Deadline 4 Submission (REP4-066)

8.1..1 NE has advised that the assessment of impacts to benthic habitats and physical processes is incomplete. The MMO will maintain a watching brief on this point.

8.1..2 NE anticipates that the majority of piling will not be able to proceed without noise abatement in place. The MMO notes that given the proven track record of NAS in reducing noise pollution it is important to consider its implementation proactively.

8.2 Historic England Deadline 4 Submissions (REP4-064)

8.2..1 The MMO notes that Historic England confirm its satisfaction with the IPMP (REP3-046) with the regard to the inclusion of text in Section 2.9.

9. Response to Rule 17 Letter

9.1 The MMO has provided updates to its Rule 17 letter response in table 5 of the MMO's Deadline 5 response.

9.2 The updates largely relate to comments on the draft DCO which are detailed in Section 7 of the MMO's Deadline 5 response and summarised in section 7 of this letter.

Yours sincerely,

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