

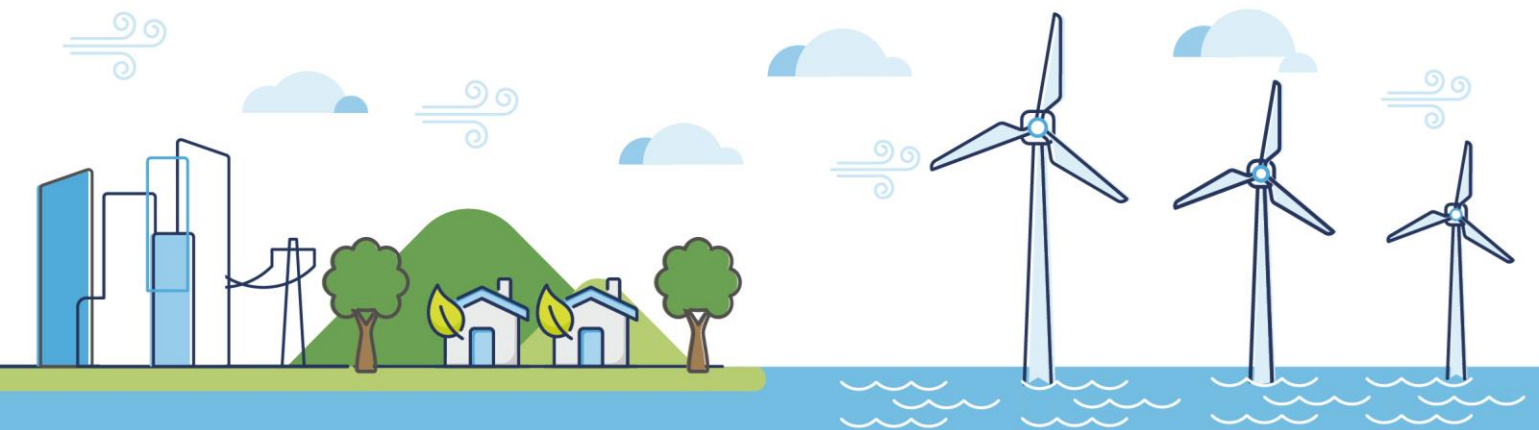
## **Morecambe Offshore Windfarm: Generation Assets Examination Documents**

### **Volume 9**

### **Draft Statement of Common Ground with Natural Resources Wales**

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Rev 02



## Document History

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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
OSP	Offshore substation platforms
PEIR	Preliminary Environmental Information Report
RIAA	Report to Inform Appropriate Assessment
SAC	Special Areas of Conservation
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 <sup>2</sup>	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.



# The future of renewable energy

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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 125km<sup>2</sup> 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 87km<sup>2</sup>.
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 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
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 (Advisory) 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
<b>Agreed</b> The matter is considered to be agreed between the parties.	Agreed
	Agreed with residual concerns/caveats
<b>Not Agreed – no material impact</b> 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

Position status	Position colour coding
<b>Not Agreed – material impact</b> 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.	Not Agreed – material impact
<b>In Discussion</b> 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
<b>Pre-application</b>			
May 2023	PEIR provided for comments	Applicant	PEIR provided under Section 42 of the Planning Act 2008
June 2023	Document with comments on the PEIR	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
14 March 2024	Written submission	NRW (A)	Reply to responses on Section 42 comments

Date	Contact type	Owner	Topic
29 April 2024	Online Meeting	Applicant	Discussion on the Project, any outstanding comments and the SoCG
<b>Post-application submission</b>			
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
6 March 2025	Online Meeting	Applicant	Discussions on SoCG and outstanding matters

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

Topic/ref.	Discussion Point	Applicants position	NRW (Advisory) position	Position summary
<b>Marine Mammals EIA</b>				
NRW – MM1	Consultation	The Applicant has undertaken adequate consultation with NRW (A) on potential impacts on marine mammals.	NRW (A) agrees that the applicant has undertaken adequate consultation with NRW (A) on potential impacts on marine mammals.	Agreed
NRW – MM2	Consultation	The EIA has had due regard to matters raised by NRW (A) through statutory and non-statutory consultation on potential impacts on marine mammals.	NRW (A) agrees that the EIA has had due regard to matters raised by NRW (A).	Agreed
NRW – MM3	Policy and planning	The Application has identified and considered the plans and policies relevant to marine mammals, within NRW (A)'s remit.	NRW (A) agrees that the Application has identified and considered the plans and policies relevant to marine mammals within our remit.	Agreed
NRW – MM4	Baseline environment	The Applicant has characterised the baseline environment appropriately and undertaken appropriate aerial surveys	NRW(A) agrees with the overall density values adopted and used in the assessment. We consider that the Applicant has characterised the baseline environment appropriately.	Agreed
NRW – MM5	Scoping	The appropriate impacts have been screened into the EIA for marine mammals	NRW (A) agrees with the scoping of impacts for the EIA for marine mammals.	Agreed
NRW – MM6	Study area	The EIA study area is appropriate for the receptors and impacts assessed.	NRW (A) agrees that the study area used for the EIA for marine mammals is appropriate, noting that the decision on the appropriateness of the study area was deferred to NE.	Agreed

Topic/ref.	Discussion Point	Applicants position	NRW (Advisory) position	Position summary
NRW – MM7	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 – MM8	Assessment methodology – Project alone	The EIA methodology used by the Applicant is appropriate to assess the Project alone significance of effects.	NRW (A) broadly agrees with the approach to the assessment of impacts.	Agreed
NRW – MM9	Assessment conclusions – Project alone	<p>No significant effects on marine mammals have been identified for the Project alone. The Applicant clarified mitigation measures in the updated MMMP at Deadline 2 (REP2-018) and has also committed to an Underwater Sound Management Strategy (UWSMS) (REP2-026) as a mechanism to secure mitigation, with an outline provided at Deadline 2.</p> <p>Both the UWSMS and MMMP have been updated at Deadline 4 (REP4-049 and REP4-027) in respect new noise guidance released in January 2025 and include the commitment to using noise abatement for the worst-case scenario. These have been resubmitted at Deadline 5 with further updates.</p> <p>The Applicant provided an updated EIA technical note in response to addressing NRW (A) Written Representations (REP3-060) at Deadline 3.</p>	<p>NRW (A) notes that while agreement on significant effects on marine mammals for the project alone were deferred to Natural England, comments would be provided for the Cumulative Effects Assessment (CEA), and where the methodology used or conclusions made for the project alone would impact the CEA.</p> <p>NRW (A) welcome the commitment to a UWSMS and agree that the UWSMS and MMMP should in principle reduce the magnitude of impacts to an acceptable level. Following the updated Applicant submissions at Deadline 4, NRW (A) has made further comments in our Deadline 5 response outlining our remaining concerns regarding Unexploded Ordnance (UXO) mitigation and Noise Abatement Systems (NAS).</p> <p>NRW (A) have now reviewed the updated ES chapters that were submitted at Deadline 4, and have provided our comments. While the updates are</p>	In Discussion

Topic/ref.	Discussion Point	Applicants position	NRW (Advisory) position	Position summary
		<p>An updated ES chapter was provided at Deadline 4 (REP4-011) which provided additional information for NRW (A) and the Applicant is working with NRW to resolve any residual concerns.</p> <p>The Applicant has submitted updates at Deadline 5 intended to address outstanding concerns.</p>	acknowledged and welcomed, NRW (A) still has some outstanding concerns which further to our meeting with the Applicant on 6 <sup>th</sup> March 2025, we expect to have resolved by Deadline 6.	
NRW – MM10	Assessment methodology – Cumulative	<p>The EIA methodology used by the Applicant is appropriate to assess the cumulative significance of effects.</p> <p>The Applicant provided an updated EIA technical note at Deadline 3 (REP3-060) in response to addressing NRW (A) Written Representations.</p> <p>An updated ES chapter was provided at Deadline 4 (REP4-011) which provided additional information for NRW (A) and the Applicant is working with NRW to resolve any residual concerns.</p> <p>The Applicant has submitted updates at Deadline 5 intended to address outstanding concerns.</p>	NRW (A) have now reviewed the updated ES chapters that were submitted at Deadline 4, and are providing comments at Deadline 5. While the updates are acknowledged and welcomed, NRW (A) still has some outstanding concerns which further to our meeting on 6 <sup>th</sup> March, we expect to have resolved by Deadline 6	In Discussion
NRW – MM11	Assessment conclusions – Cumulative	<p>No significant cumulative effects on marine mammals have been identified for the Project in relation to marine mammals.</p> <p>The Applicant provided an updated EIA technical note at Deadline 3 (REP3-060)</p>	NRW (A) have now reviewed the updated ES chapters that were submitted at Deadline 4, and are providing comments at Deadline 5. While the updates are acknowledged and welcomed, NRW (A) still has some outstanding concerns which	In Discussion

Topic/ref.	Discussion Point	Applicants position	NRW (Advisory) position	Position summary
		<p>in response to addressing NRW (A) Written Representations.</p> <p>An updated ES chapter was provided at Deadline 4 (REP4-011) which provided additional information for NRW (A) and the Applicant is working with NRW to resolve any residual concerns.</p> <p>The Applicant has submitted updates at Deadline 5 intended to address outstanding concerns.</p>	<p>further to our meeting on 6<sup>th</sup> March, we expect to have resolved by Deadline 6</p>	
NRW – MM12	Mitigation and monitoring	<p>The mitigation measures outlined in the EIA chapter, MMMP and Underwater Sound Management Strategy (UWSMS) ((REP4-049 and REP4-027) are appropriate and will ensure significant effects are avoided. The monitoring outlined in the IPMP is appropriate.</p> <p>The Applicant updated the MMMP at Deadline 2 and has also committed to a Underwater Sound Management Strategy (UWSMS) as a mechanism to secure mitigation, with an outline provided at Deadline 2.</p> <p>Both the UWSMS and MMMP have been updated at Deadline 4 in respect new noise guidance released in January 2025 and include the commitment to using noise abatement for the worst case scenario. These have been resubmitted at Deadline 5 with further updates.</p>	<p>NRW (A) welcome the commitment to a UWSMS and agree that the UWSMS and MMMP should in principle reduce the magnitude of impacts to an acceptable level. NRW (A) are providing further comments based on the updates in the Applicant's Deadline 4 submissions at Deadline 5. While the updates are acknowledged and welcomed, NRW (A) still has some outstanding concerns which further to our meeting on 6<sup>th</sup> March, we expect to have resolved by Deadline 6.</p>	In Discussion

Topic/ref.	Discussion Point	Applicants position	NRW (Advisory) position	Position summary
		<p>An updated ES chapter was provided at Deadline 4 (REP4-011) which provides additional information for NRW (A) and the Applicant is working with NRW to resolve any residual concerns.</p> <p>The Applicant has submitted updates at Deadline 5 intended to address outstanding concerns.</p>		
<b>Marine Mammals HRA</b>				
NRW – MM13	Screening	The appropriate impacts have been screened into the HRA for marine mammals.	<p>NRW (A) can agree with the list of potential effects scoped in for Likely Significant Effects (LSE) and the list of Special Areas of Conservation (SAC) scoped in for the assessment.</p> <p>NRW (A) have now completed a full review with our position correct as of Deadline 5. We intend to provide a further update at Deadline 6 based on the Applicant's submissions at Deadline 5.</p>	Agreed
NRW – MM14	Assessment methodology	All European sites with marine mammal features with the potential for LSE have been identified within the HRA Stage 1 screening and considered in the Stage 2 RIAA.		Agreed
NRW – MM15	Assessment methodology	<p>The approach used for determining LSE on European sites with Annex II marine mammals as features is appropriate, and all the relevant sites have been identified.</p> <p>The Applicant has submitted updates at Deadline 5 intended to address outstanding concerns.</p>		In Discussion
NRW – MM16	Outcomes of the RIAA (Project alone)	There will be no adverse effects on integrity for SACs designated for marine mammal features for any impacts for the Project alone.	NRW (A) broadly agrees with the assessment conclusions.	Agreed

Topic/ref.	Discussion Point	Applicants position	NRW (Advisory) position	Position summary
NRW – MM17	Outcomes of the RIAA (in-combination with other plans and projects)	<p>There will be no adverse effects on integrity for SACs designated for marine mammal features for any impacts for the project in-combination with other projects and plans.</p> <p>The Applicant provided an updated HRA technical note (REP3-062) at Deadline 3 in response to addressing NRW (A) Written Representations.</p> <p>An updated RIAA (REP4-009) was provided at Deadline 4 which provides additional information for NRW (A) and is working with NRW to resolve any residual concerns.</p> <p>The Applicant has submitted updates at Deadline 5 intended to address outstanding concerns.</p>	NRW (A) still have some outstanding concerns regarding the CEA – given that the results of the in-combination assessment are based on the CEA, we are currently unable to agree with the conclusions.	In Discussion
<b>Ornithology EIA</b>				
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 would have been beneficial.	Not Agreed – No material impact
NRW – OO2	Consultation	The EIA has had due regard to matters raised by NRW (A) through statutory and non-statutory consultation on potential ornithological impacts.	<p>As the Morecambe Generation Assets project is located wholly within English waters, NRW (A)'s primary area of interest for offshore ornithology is on impacts to Welsh designated sites.</p> <p>NRW (A) raised the need for a quantitative assessment of impacts to the features of</p>	Not Agreed – No material impact

Topic/ref.	Discussion Point	Applicants position	NRW (Advisory) position	Position summary
			<p>the Pen y Gogarth/Great Orme's Head SSSI in our comments on the project's 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 have some concerns regarding the approaches taken, particularly the use of non-breeding season stable age-structures to age-class apportion in the breeding season in the cumulative assessment, which risks underestimating the impact to breeding adults</p> <p>(see our Deadline 4 response [REP4-074]).</p>	
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

Topic/ref.	Discussion Point	Applicants position	NRW (Advisory) position	Position summary
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	<p>The EIA methodology used by the Applicant is appropriate to assess the Project alone significance of effects.</p> <p>The Applicant has provided an updated EIA technical note to address NRW (A) Written Representations at Deadline 3 (REP3-056). No changes to the conclusions were identified and it is the intention up make the updates in the ES for Deadline 5.</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 has submitted updates at Deadline 5 intended to address outstanding concerns.</p>	<p>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. This could have implications for the 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], NRW (A) 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</p>	In Discussion

Topic/ref.	Discussion Point	Applicants position	NRW (Advisory) position	Position summary
			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 [REP4-074]).	
NRW – OO9	Assessment conclusions – Project alone	<p>No significant effects on ornithology have been identified for the Project alone.</p> <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 has submitted updates at Deadline 5 intended to address outstanding concerns</p>	<p>As the Morecambe Generation Assets project is located wholly in English waters, NRW'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 (covered under EIA). Regarding EIA scale impacts from the project alone, we defer advice to Natural England, with the exception of impacts to Welsh SSSIs.</p> <p>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. NRW (A) 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.</p>	In Discussion

Topic/ref.	Discussion Point	Applicants position	NRW (Advisory) position	Position summary
			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 [REP4-074]).	
NRW – OO10	Assessment methodology – Cumulative	<p>The EIA methodology used by the Applicant is appropriate to assess the cumulative significance of effects. 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 has submitted updates at Deadline 5 intended to address outstanding concerns.</p>	<p>In our Written Representations [REP1-099], NRW raised concerns with the number of gaps in the cumulative 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. However, we 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 [REP4-074]).</p>	In Discussion

Topic/ref.	Discussion Point	Applicants position	NRW (Advisory) position	Position summary
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 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 has submitted updates at Deadline 5 intended to address outstanding concerns.</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 (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 [REP4-074]).</p>	In Discussion
<b>Ornithology HRA</b>				
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/Ramsars 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

Topic/ref.	Discussion Point	Applicants position	NRW (Advisory) position	Position summary
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
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>An updated RIAA was submitted at Deadline 4 (REP4-009).</p>	<p>Following the Applicant's updated displacement assessments for Manx shearwater and gannet Welsh SPAs presented in REP3-058 and the updated RIAA [REP4-009] 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 [REP1-099], Deadline 4 [REP4-074] and Deadline 5 [tbc] advice).</p> <p>Please note that NRW (A) defer to Natural England regarding features of the Liverpool Bay SPA.</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</p>	<p>Following the updates to the in-combination assessments in the updated RIAA [REP4-009], which includes gap filled historic projects in the assessments and considers displacement assessments across the full range of advised % displacement and % mortality rates, NRW (A) agree that there would be no AEoSI for all Welsh SPA/Ramsar site and feature combination for in-combination impacts (see our Deadline 5 response ).</p>	Agreed – with caveats (deferral on Liverpool Bay SPA to NE)

Topic/ref.	Discussion Point	Applicants position	NRW (Advisory) position	Position summary
		<p>address NRW (A) Written Representations.</p> <p>An updated RIAA was submitted at Deadline 4 (REP4-009).</p>	<p>Please note that NRW (A) defer to Natural England regarding features of the Liverpool Bay SPA.</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 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)