

Natural Resources Wales
Welsh Government Offices
Cathays Park

King Edward VII Avenue

Cardiff

CF10 3NQ

Ebost/Email: marine.advice@cyfoethnaturiolcymru.gov.uk

The Planning Inspectorate
Temple Quay House
2 The Square
Bristol
BS1 6PN

By email: MorecambeOffshoreWindProject@planninginspectorate.gov.uk

Dyddiad/Date: 12/03/2025

Er sylw / For the attention of: Robert Jackson

Annwyl / Dear Robert,

PROPOSED MORECAMBE OFFSHORE WINDFARM GENERATION ASSETS

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

EIN CYFEIRNOD / OUR REFERENCE: 20049491

**RE: NATURAL RESOURCES WALES' RESPONSE TO THE EXAMINING
AUTHORITY'S FIRST WRITTEN QUESTIONS**

Thank you for your Rule 8 letter, dated 30th October 2024, requesting Cyfoeth Naturiol Cymru / Natural Resources Wales' (NRW) comments regarding the above.

Please find below NRW's Response to the Examining Authority's second set of written questions (ExAQ2), published on 27th February 2025.

These comments/question responses should be read in conjunction with advice previously provided into the examination.

The comments provided in this submission comprise NRW's response as a Statutory Party under the Planning Act 2008 and Infrastructure Planning (Interested Parties) Regulations 2015 and as an 'interested party' under s102(1) of the Planning Act 2008.

Our comments are made without prejudice to any further comments or advice we may wish to make in relation to this application and examination 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 Flotation Energy ('the Applicant'), the Examining Body or other interested parties.

Should further clarity be required, we will be pleased to answer these further through the Examining Authority questions and / or a Rule 17 request(s).

Please do not hesitate to contact Rebekah Newstead [REDACTED] [\[REDACTED\]@cyfoethnaturiolcymru.gov.uk](mailto:[REDACTED]@cyfoethnaturiolcymru.gov.uk) and Bridget Randall-Smith [REDACTED] [\[REDACTED\]@cyfoethnaturiolcymru.gov.uk](mailto:[REDACTED]@cyfoethnaturiolcymru.gov.uk) should you require further advice or information regarding these representations.

Yn gywir / Yours sincerely,

[REDACTED]

Andrea Winterton
Marine Services Manager
Natural Resources Wales

[CONTINUED]

ExQ2	Question to:	Question:	NRW RESPONSE
Marine Mammals			
2BEM6	NRW	Marine Mammals The ExA notes that the Outline Marine Mammal Management Protocol [REP4-027] and Outline Underwater Sound Management Strategy [REP4-049] refer to the Defra and JNCC guidance published in January 2025 and include commitments to NAS. Can NRW(A) explain what further mitigation it considers is needed in relation to marine mammals and piling and confirm whether this is for effects identified in the EIA, HRA or both.	NRW (A) notes that as non-signatories to the DEFRA and JNCC guidance published in January (<i>JNCC, Natural England and Cefas position on the use of quieter piling methods and noise abatement systems when installing offshore wind turbine foundations, 2025</i>), any decisions and final input on this are deferred to Natural England in this instance. We are satisfied that the Applicant has addressed our concerns regarding residual injury from piling. However, in Section 2.3 of our Deadline 5 response we recommend that the Applicant aligns their commitments further to the DEFRA and JNCC guidance.
Offshore Ornithology			
2BEM8.	NRW	Guillemot and Razorbill In paragraphs 21 and 23 of its D4 submission [REP4-074] NRW (A) indicates that it considers that the apportionment of 100% of birds as adults should be used for guillemots and razorbills rather than the stable age structure of 57% as adults. Given the whole population will extend over a whole life-cycle, could NRW (A) please explain why the 100% figure should be used rather than the real-case percentage, otherwise does not the analysis risk becoming over-precautionary?	<p>NRW (A) note that this question relates to our advice regarding the Pen y Gogarth / Great Orme's Head SSSI colony assessment. The Great Orme's Head SSSI is designated for its breeding populations (i.e. adult) of guillemot, razorbill and kittiwake. Consequently, the assessments are based on calculations using the breeding adult colony size, adult survival and mortality rates, so the currency of the assessment is adults only.</p> <p>In REP4-074, we advised using the assumption that 100% of birds recorded are adults for both guillemot and razorbill for the Great Orme's Head SSSI assessment is only applicable for the breeding season. This is because age-class identification for auks is not possible from site-specific digital aerial survey (DAS) data, which is</p>

ExQ2	Question to:	Question:	NRW RESPONSE
			<p>the case for the Round 4 Irish Sea projects (including Morecambe). Nor is site-specific age-class data available for the gap-filled historic projects. Therefore, in order to apportion impacts to a breeding colony in the breeding season, standard advice is to take a precautionary approach and assume all birds are adults. Whilst this may not be a correct reflection of the proportion of adults at sea in any given area during the breeding season, it reflects the worst case to base an assessment on. This approach is consistent with advice provided to other projects and the approaches taken by other projects in assessments and with the approach the Applicant themselves have taken for the auk breeding colony SPA assessments.</p> <p>In the Applicant's Great Orme's Head assessment [REP3-056], they have followed this advised approach for apportionment of impacts from the Morecambe project alone. However, for the cumulative assessment for all included offshore wind projects, the Applicant has used the stable-age structure proportion of adults of 57% (for both guillemot and razorbill) calculated by Furness (2015) for the non-breeding seasons.</p> <p>We reiterate that Furness (2015) does not present a stable age structure for the breeding season - the report covers purely the non-breeding season(s). Additionally, the age-structures calculated in Furness (2015) were calculated for the biologically defined minimum population scale (BDMPS) regions and not for specific areas of sea covered by individual offshore wind projects. As was noted in paragraph 15 of our Deadline 4 submission [REP4-074], the UK Western waters BDMPS (and for some species, this includes the</p>

ExQ2	Question to:	Question:	NRW RESPONSE
			<p>Channel as well) covers a vast area, incorporating all territorial waters from the west of Cornwall to Orkney. Given this scale, the ratio of adults to immature birds is likely to be highly spatially variable, and there is no basis to assume that the ratio is applicable to a small project study area, as the Applicant has done.</p> <p>Regarding the apportionment of impacts in the non-breeding season(s), our advice in REP4-074 recommends using data from Furness (2015) Appendix A tables, which already account for the number of adults likely to be present in the BDMPS.</p> <p>Therefore, whilst taking the advised approach of assuming 100% of guillemots and razorbills recorded on each OWF project in the breeding season are adults may have the potential to result in over precaution in estimates. However, the Applicant's current approach of using the Furness (2015) non-breeding season stable age-structures for proportions of adults at wind farm projects in the breeding season has the potential to result in under precaution in estimated impacts to breeding adult birds from the colony. Following the NRW (A) advised approach means that the assessment is based on the worst case and follows a consistent best practice approach.</p>
Schedule 7 – Without prejudice compensation measures			
2DCO5. 	The applicant NE NRW (A)	Notification procedures In paragraph 2(1) of both Parts 1 and 2 of Schedule 7 there is a time period of six months set in a square bracket. Could the	<p>We note that in parts 1 and 2 of Schedule 7 of the updated draft DCO [REP4-002] state:</p> <p><i>"2.—(1) No later than [six] months prior to the commencement of the</i></p>

ExQ2	Question to:	Question:	NRW RESPONSE
		applicant, NE and NRW (A) please confirm this provision, removing the square bracket.	<p><i>authorised development, the undertaker must advise the Secretary of State of the intention to provide compensation either— (a) through a contribution to the strategic compensation fund; or (b) through a project-alone habitat management measure."</i></p> <p>Given that this issue is related to provision of compensation, we note that in principle compensation packages for marine ornithology have been submitted by the Applicant for English lesser black-backed gull sites (Morecambe Bay and Duddon Estuary SPA and Ribble and Alt Estuaries SPA). These are English sites and thus do not fall within NRW's remit, so we defer comment on this question to Natural England (NE). In addition, an in-principal compensation package has also been submitted by the Applicant for red-throated diver at the Liverpool Bay SPA. Whilst the Liverpool Bay SPA is a shared site between NE, NRW and JNCC, given that the Morecambe Generation Assets project is located wholly in English waters, we also defer comment/advice regarding this issue to NE.</p>