



THE PLANNING ACT 2008

THE INFRASTRUCTURE PLANNING (EXAMINATION PROCEDURE) RULES  
2010

MORECAMBE GENERATION OFFSHORE WIND FARM

**Appendix D2 to Natural England's Deadline 5 Submission**

**Natural England's comments on Marine Mammals at Deadline 5**

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

13 March 2025

## Morecambe Generation Deadline 5 Marine Mammal Specialist Comments

### 1. Minor comments

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

- [REP4-050] 9.32.1 Outline Underwater Sound Management Strategy (Tracked) - Revision 02 (Volume 9)

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

Document reviewed	Update made	Issue resolved?
REP4-050	Natural England welcomes the Applicant's commitment not to undertake piling activities in conjunction with UXO clearance. We anticipate further information on how this will be achieved and the potential reduction in impact ranges at Deadline 5.	Progressed, awaiting further information.

## 2. Major/Complex comments

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

- [REP4-010] 4.9.1 Report to Inform Appropriate Assessment (Tracked) - Revision 03 (Volume 4)
- [REP4-012] 5.1.11.1 Environmental Statement Chapter 11: Marine Mammals (Tracked) - Revision 03 (Volume 5)
- [REP4-014] 5.2.11.1.1 Environmental Statement Appendix 11.1: Underwater Noise Assessment (Tracked) - Revision 02 (Volume 5)
- [REP4-016] 5.2.11.2.1 Environmental Statement Appendix 11.2: Marine Mammal Information and Survey Data (Tracked) - Revision 04 (Volume 5)
- [REP4-018] 5.2.11.3.1 Environmental Statement Appendix 11.3: Marine Mammal Unexploded Ordnance Assessment (Tracked) - Revision 03 (Volume 5)
- [REP4-020] 5.2.11.4.1 Environmental Statement Appendix 11.4: Marine Mammal CEA Project Screening (Tracked) - Revision 03 (Volume 5)
- [REP4-026] 6.4.1 In Principle Monitoring Plan (Tracked) - Revision 03 (Volume 6)
- [REP4-028] 6.5.1 Draft Marine Mammal Mitigation Protocol (Tracked) - Revision 03 (Volume 6)
- [REP4-050] 9.32.1 Outline Underwater Sound Management Strategy (Tracked) - Revision 02 (Volume 9)

### 2.1. Summary

Natural England welcomes the updates made by the Applicant on a number of issues concerning marine mammals. The commitment to NAS made by the Applicant is a step forward in resolving our issues around outstanding impacts to marine mammals, although we consider that the Applicant should commit to implementing NAS in all piling scenarios. As the results of the Applicant's Disturbance Impact assessment are reliant on the inclusion of NAS to conclude Not Significant impact levels, we reiterate that NAS should be applied in all piling scenarios, and that this would be additional, rather than embedded, mitigation. Natural England has no outstanding concerns with the assessment or conclusions for Bristol Channel Approaches SAC. The relevant country SNCB for the remaining marine mammal designated sites, NRW, will lead on providing advice for those sites. Natural England maintains that the Applicant should commit to a piling break procedure in line with JNCC guidance at this stage, which can then be refined post consent through the MMMP.

### 2.2. Detailed comments

#### Use of NAS for the worst case scenario

Natural England welcomes the Applicants intention to implement mitigation measures for the underwater noise impacts of piling, including Noise Abatement Systems (NAS). We note, however that this is currently only proposed "if the Project worst case was to be actualised (the high strike rate scenario with the maximum hammer energy)" within 4.9.1 Report to Inform Appropriate Assessment Rev 3 [REP4\_010], 5.1.11.1 ES Chapter 11 Marine Mammals Rev 3 [REP4\_012], 9.32.1 Outline Underwater Sound Management Strategy Rev 2 [REP4\_050], and 6.5.1 Draft Marine Mammal Mitigation Protocol [REP4\_028]. We advise that hammer energies and/or strike rates below the upper limit of the WCS also present a risk of noise impacts to marine mammals that would not be mitigated if these measures were implemented only at the upper limit of the WCS. We also question the practicality of only implementing NAS at a specific strike rate/hammer energy, given the exact values are not usually known until piling commences. This uncertainty would also necessitate that NAS is in

place at each piling location, ready to be used should the hammer energy/strike rate conditions be met. Under such circumstances, Natural England advises that it would be most appropriate to utilise NAS for all piling. Furthermore, consenting an envelope for piling means that there is always a risk of the maximum consented being realised. We therefore advise that NAS is implemented for all piling in order to manage this risk. It is NE's understanding that the Applicant does intend to update the wording around the scenarios under which NAS would be used and we therefore expect that this issue can be resolved before the end of Examination, in addition to several others noted in our Risk and Issues Log.

#### Disturbance impact methods (RI D28)

All approaches used are now presented in ES Chapter 11 Marine Mammals Rev 3 [REP4\_012], with residual impacts concluded as Not Significant across all assessments on the basis of the embedded mitigation measures proposed. Natural England advises that these should only be ruled out on the basis of our advice on NAS being followed as well, noting that it is additional, not embedded mitigation.

#### National Sites outside of English waters

Natural England notes that all National Sites with marine mammal features screened in for further assessment in 4.9.1 Report to Inform Appropriate Assessment Rev 3 [REP4\_010] are located outside of English Territorial waters, with the exception of Bristol Channel Approaches SAC which is a cross-border site between England and Wales. Therefore, the relevant country SNCBs for these sites will lead on providing advice concerning them. Natural England has no outstanding concerns with the assessment or conclusions for Bristol Channel Approaches SAC.

#### Breaks in piling

Natural England advises that the current guidance for breaks in piling should be committed to pre-consent as a matter of best practice due to the current uncertainties around the level of mitigation to be delivered, the final project design and the status of updates to this guidance. In recognition of potential changes to these factors, Natural England would welcome the opportunity to engage with the Applicant regarding refining the break procedure in the pre-construction period through advice to the Applicant on the MMMP and other relevant plans to be submitted for review in this period.