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Dyddiad/Date: 01/09/2025

Er sylw / For the attention of:

John Wheadon  
Head of Energy Infrastructure Planning & Innovation  
On behalf of the Secretary of State for Energy Security and Net Zero

Annwyl / Dear John,

**PLANNING ACT 2008 AND THE INFRASTRUCTURE PLANNING (EXAMINATION  
PROCEDURE) RULES 2010**

**APPLICATION BY MORECAMBE OFFSHORE WINDFARM LIMITED ("THE  
APPLICANT") FOR AN ORDER GRANTING DEVELOPMENT CONSENT FOR THE  
PROPOSED MORECAMBE OFFSHORE WINDFARM PROJECT: GENERATION  
ASSETS ("THE PROPOSED DEVELOPMENT")**

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

**EIN CYFEIRNOD / OUR REFERENCE: 20049491**

**REQUEST FOR INFORMATION**

Thank you for your Information Request Letter, dated 21<sup>st</sup> August 2025, requesting information from Cyfoeth Naturiol Cymru / Natural Resources Wales' (NRW) regarding the above proposal.

Please note that our comments are made without prejudice to any further comments we may wish to make in relation to this Application 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 Morecambe Offshore Windfarm Limited ("the Applicant"), the Secretary of State Secretary of State for Energy Security and Net Zero, or other Interested Parties.

Please find below, Natural Resources Wales' (NRW)'s response to the question directed at us in the Information Request letter:

**Updates in respect of Habitats Regulation Assessment ("HRA") matters**

**3. Noting that further HRA information was submitted by the Appropriate Nature Conservation Bodies and the Applicant at Deadline 6 following publication of the Report on the Implications for European Sites, the Secretary of State invites the Applicant, NE, NRW(A), and JNCC to provide any final comments on that further information.**

Please do not hesitate to contact [REDACTED] [REDACTED]  
[REDACTED] [@cyfoethnaturiolcymru.gov.uk](mailto:@cyfoethnaturiolcymru.gov.uk) and [REDACTED] [REDACTED]  
[REDACTED] [@cyfoethnaturiolcymru.gov.uk](mailto:@cyfoethnaturiolcymru.gov.uk) should you require further advice or information regarding the above.

Yn gywir / Yours sincerely,

[REDACTED]

[REDACTED]  
**Marine Services Manager**  
**Natural Resources Wales**  
[CONTINUED]

# 1 Marine Ornithology

1. With regard to offshore ornithology, following the Applicant's updates to the Report to Inform Appropriate Assessment (RIAA) [REP4-009/010], at Deadline 5 NRW Advisory (A) confirmed that an Adverse Effect on Site Integrity (AEoSI) could be ruled out for the project alone and in-combination for all relevant marine ornithology features of Welsh SPAs/Ramsars screened into the RIAA [REP5-084].
2. NRW (A) note that at Deadline 5 the Applicant corrected the error regarding lesser black-backed gull for Skomer, Skokholm and seas off Pembrokeshire (SSSP) Special Protection Area (SPA) in the updated RIAA [REP5-010/011]. In our Deadline 6 response [REP6-053], NRW (A) welcomed the Applicant's amendments and stated that for this site and feature our advice remained as set out in REP5-084 in that an AEoSI can be ruled out for collision risk from the project alone and in-combination for the lesser black-backed gull feature of the SSSP SPA.
3. NRW (A) can confirm that our advice remains unchanged and that an AEoSI can be ruled out for all relevant marine ornithology features of Welsh SPAs/Ramsars screened into the RIAA. To avoid doubt, the sites and features concerned, and conclusions are summarised in Table 1 below.
4. NRW (A) note that new [conservation advice packages](#)<sup>1</sup> have recently been produced for Welsh SPAs (please note that new packages have not been produced for cross border sites such as Skomer, Skokholm and seas off Pembrokeshire SPA). These new packages do not result in a change of our previous advice, as summarised in Table 1 below.

*Table 1 Summary of conclusions for assessments of the Morecambe Generation project alone and in-combination for HRA scale with other plans and projects for relevant features of Welsh SPAs/Ramsars screened into the RIAA.*

HRA species and site	Morecambe Generation Project Alone**	Morecambe Generation in-combination with other plans & projects**
<b>Skomer, Skokholm &amp; seas off Pembrokeshire (SSSP)</b> <b>SPA:</b> Manx shearwater, puffin, European storm petrel (displacement); LBBG (collision); seabird assemblage* (displacement & collision)	No AEoSI	No AEoSI
<b>Grassholm SPA:</b> gannet (collision, displacement, collision + displacement)	No AEoSI	No AEoSI
<b>Aberdaron Coast &amp; Bardsey Island SPA:</b> Manx shearwater (displacement)	No AEoSI	No AEoSI

<sup>1</sup><https://naturalresources.wales/guidance-and-advice/environmental-topics/wildlife-and-biodiversity/protected-areas-of-land-and-seas/conservation-advice-for-european-marine-sites/?lang=en>

<b>The Dee Estuary SPA/Ramsar:</b> all migratory waterbird features (collision)	No AEoSI	No AEoSI
<b>Anglesey Terns SPA:</b> Common tern, Arctic tern, Sandwich tern (collision)	No AEoSI	No AEoSI
<b>Ynys Seiriol/Puffin Island SPA:</b> Cormorant	No AEoSI	No AEoSI
<b>Traeth Lafan/Lavan Sands, Conway Bay SPA:</b> all migratory waterbird features (collision)	No AEoSI	No AEoSI

\* Includes guillemot, razorbill and kittiwake that are named components of the seabird assemblage feature

\*\* As detailed in REP5-084

- As is noted in our Deadline 5 response [REP5-084] and in the Applicant's Statement of Common Ground with the Applicant [REP6-036], as the Morecambe Generation Assets project is located wholly in English waters, NRW (A) defer comment/advice regarding predicted impacts and integrity judgements of the project alone and in-combination for all qualifying features of the Liverpool Bay SPA to Natural England.

## 2 Marine Mammals

- Regarding marine mammals, NRW (A) remains in agreement with the conclusions of no Adverse Effect on Site Integrity for Special Area's of Conservation (SAC's), for which NRW are the Appropriate Nature Conservation Body (ANCB), screened into the Report to Inform Appropriate Assessment (RIAA). Our views are therefore unchanged from our Deadline 6 submission [REP6-053].
- NRW (A) note that new [condition assessments](https://www.naturalresources.wales/guidance-and-advice/environmental-topics/wildlife-and-biodiversity/protected-areas-of-land-and-seas/condition-assessments-for-welsh-european-marine-sites-ems/?lang=en)<sup>2</sup> and [conservation advice](https://naturalresources.wales/guidance-and-advice/environmental-topics/wildlife-and-biodiversity/protected-areas-of-land-and-seas/conservation-advice-for-european-marine-sites/?lang=en)<sup>3</sup> packages have recently been produced for Welsh marine mammal SACs and are available to view on the NRW website. These new packages do not result in a change to our previous advice.

<sup>2</sup><https://www.naturalresources.wales/guidance-and-advice/environmental-topics/wildlife-and-biodiversity/protected-areas-of-land-and-seas/condition-assessments-for-welsh-european-marine-sites-ems/?lang=en>

<sup>3</sup><https://naturalresources.wales/guidance-and-advice/environmental-topics/wildlife-and-biodiversity/protected-areas-of-land-and-seas/conservation-advice-for-european-marine-sites/?lang=en>