



To:
Morecambe Offshore Windfarm Limited
Spirit Energy

Our Ref: EN010121

Date: 26 September 2025

Dear Sir or Madam,

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”)

REQUEST FOR INFORMATION

1. Following the completion of the Examination on 23 April 2025, the Examining Authority (“ExA”) submitted its Report and Recommendation in respect of its findings and conclusions on the above application to the Secretary of State on 23 July 2025. In accordance with section 107 of the Planning Act 2008 (“PA 2008”), the Secretary of State has three months to determine the application.
2. The Secretary of State requests that the **Applicant** and **Spirit Energy** provide information as set out below.

Compliance with the mitigation hierarchy in respect of kittiwake

3. The Secretary of State notes that the Applicant concluded there would be a significant residual cumulative effect at the Environmental Impact Assessment (“EIA”) level on kittiwake of the Pen y Gogarth / Great Orme’s Head SSSI due to collision risk, as set out in *The Applicant’s Summary and Signposting Document* [REP6-040]. Natural Resources Wales (Advisory) (“NRW(A)”) [REP6-053] was content that the Applicant has provided proportionate mitigation (through the air draught height) for this impact.
4. In light of this, and with reference to *The Applicant’s Response to Secretary of State’s Letter and Request for Information* in respect of great black-backed gull, the Secretary of State invites the **Applicant** to explain what consideration has been given to the feasibility of implementing compensation for kittiwake. In addition, the **Applicant** should also provide draft without prejudice wording for a requirement to secure the provision of compensation for kittiwake.

Cumulative Effects Assessment

5. The Secretary of State notes that the application for Marine Infrastructure Consent for the proposed Mooir Vannin Offshore Windfarm has been accepted for examination by the Isle of Man Government's Council of Ministers and the full application, including the Environmental Impact Statement, is now publicly available. The Secretary of State considers that Mooir Vannin Offshore Windfarm should be included within the cumulative assessment for the Proposed Development. The **Applicant** should update its Cumulative Effects Assessment and/or In-Combination Habitats Regulations Assessment ("HRA") and/or Report on Interrelationships with Other Infrastructure Projects in light of this newly available environmental information and should incorporate quantitative and qualitative data relating to the proposed Mooir Vannin Offshore Windfarm development.
6. The **Applicant** is invited to consider and explain whether the Scoping Report for the East Irish Sea Transmission Project contains sufficient information to facilitate a meaningful assessment of potential cumulative effects, and to update the Cumulative Effects Assessment and/or In-Combination HRA and/or Report on Interrelationships with Other Infrastructure Projects as necessary.

Assessment of Alternative Solutions

7. The Secretary of State acknowledges and welcomes the agreement reached between the Applicant and Harbour Energy on the form of the Protective Provisions, which both parties have confirmed can be included in Part 2 of Schedule 3 of the Development Consent Order. The Secretary of State notes that these agreed Protective Provisions provide for aviation buffer zones around the Calder platform only until 1 January 2029. The *Harbour Protective Provisions Plan* accordingly reflects an unconstrained area at the south-western corner of the site. However, the Secretary of State notes that this area is shown as constrained in the figures provided in the *Applicant's Appendix A: Assessment of Alternative Solutions*.
8. The Applicant is requested to provide an updated Appendix A: Assessment of Alternative Solutions, taking into account the agreed Protective Provisions with Harbour where there will be no enduring aviation buffer after 1 January 2029 (paragraph 4 of *Harbour Energy – Agreed Protective Provisions*). The Applicant is requested to provide comments on the potential for locating wind turbine generators ("WTG") in this part of the site, should the Secretary of State determine that either the 10km Shell Flat buffer or 7.5km original SPA buffer is to be applied.
9. Additionally, the **Applicant** should confirm whether the adoption of such a WTG layout would affect the conclusions of the EIA and the HRA.

Commercial negotiations and agreements

10. The **Applicant** and **Spirit Energy** are invited to provide an update on progress towards a commercial agreement to replace the proposed Protective Provisions for the protection of Spirit Energy's interests. Alternatively, if it has not yet been possible to finalise a commercial agreement, the **Applicant** and **Spirit Energy** are invited to provide an update on whether agreement has been reached on any specific areas of disagreement between the parties which remained outstanding at the conclusion of the Examination, as to the form of Protective Provisions which should be included in a final Development Consent Order in the absence of a commercial agreement. It is the Secretary of State's expectation that the parties should continue to endeavour to reach agreement on as many outstanding issues as possible, and provide updates accordingly.

Deadline for response

11. Responses should be submitted by email only to MorecambeOffshoreWindProject@planninginspectorate.gov.uk by **23:59 on 10 October 2025**.
12. Responses will be published on the Morecambe Offshore Wind Project: Generation Assets project page of the National Infrastructure Planning website as soon as possible after 10 October 2025:
- <https://infrastructure.planninginspectorate.gov.uk/projects/north-west/morecambe-offshore-windfarm/>
13. This letter is without prejudice to the Secretary of State's consideration of whether to grant or withhold development consent for the Proposed Development or any part of the project.
14. Nothing in this letter is to be taken to imply what the eventual decision might be or what final conclusions the Secretary of State may reach on any particular issue which is relevant to the determination of the application.

Yours faithfully,

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