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By email: MorecambeOffshoreWindProject@planninginspectorate.gov.uk

Dyddiad/Date: 06/10/2025

Er sylw / For the attention of:

Ben Million
Co-Head of Energy Infrastructure Planning
On behalf of the Secretary of State for Energy Security and Net Zero

Annwyl / Dear Ben,

**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 5th September 2025, requesting comments from various parties regarding the submissions of the prior information request of 21st August 2025.

Having reviewed all the relevant documents, we highlight that NRW Advisory (A) have deferred EIA scale advice at the Morecambe Generation Assets project to Natural England and continue to do so. However, as a point of principle, we note that paragraph 50 of the

[Applicant's response to Secretary of State Letter and Request for Information](#) regarding great black-backed gull (GBBG) states:

'....Using a different assessment approach accepted by the relevant SNCBs, Mona Offshore Windfarm was able to conclude a minor adverse cumulative collision risk effect on GBBG in EIA terms.'

NRW (A) considers that this statement is misleading in terms of NRW (A)'s advice during the Mona project examination. This is because, whilst the Mona applicant themselves did conclude a minor adverse impact (i.e. not significant in EIA terms) for GBBG cumulative collision mortality (see Table 5-134 of Mona Offshore Wind Deadline 7: Environmental Statement Volume 2, Chapter 5: Offshore Ornithology (REP7-033/034), NRW (A)'s advice regarding this was that a moderate adverse impact (i.e. significant in EIA terms) could not be ruled out. Please see our responses during the Mona project Examination, namely: paragraph 90 of Annex A of NRW's Deadline 4 submission (PINS ref REP4-105), Table 1 and Section 1.1.2 of Appendix 1 of our Deadline 6 (PINS REP6-137) responses and Table 1.10, point NRW.OO.27 of the SoCG for Mona and NRW (A) Offshore submitted at Deadline 7 (PINS ref REP7-094) for details. NRW were content with the Mona applicant's approach to the gap filling for generating the indicative cumulative assessments but made our conclusions for GBBG cumulative collisions based on the indicative figures using the SNCB advised species-group avoidance rate, including all gap filled projects and using consented wind farm parameters where available and as-built where consented information is not available.

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 do not hesitate to contact [REDACTED]
[REDACTED] @cyfoethnaturiolcymru.gov.uk and [REDACTED]
[REDACTED] @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