

04 October 2025

Energy Infrastructure Planning
Department of Energy Security and Net Zero
Darlington Economic Campus
Darlington
DL1 5BF

Your reference EN010121
Our reference MOR001-FLO-CON-LET-0017

Dear Sir,

<u>Morecambe Offshore Windfarm: Generation Assets – Application for Development</u> <u>Consent Order, Planning Inspectorate reference EN010121</u>

Morecambe Offshore Windfarm Limited (the Applicant) writes in response to the Secretary of State's letter dated 05 September 2025¹ requesting comment (Consultation 2) from the Applicant and interested parties on the information provided² in response to his information request of 21 August 2025³.

Please find below our response to the submissions from interested parties.

Joint Nature Conservation Committee

The Applicant notes that the Joint Nature Conservation Committee (JNCC) in their response to the information request (C1-008⁴) have reiterated their position at the close of the examination in relation to the use of noise abatement systems and/or quieter hammer technology for impact piling, and that they consider that their comments remain relevant.

The Applicant highlights its response to the information request (C1-011⁵) which addresses compliance with the January 2025 update to underwater noise guidance, Section 2.2.1.

Stena Line Limited

The Applicant thanks Stena Line Limited (Stena) for their confirmation that the parties reached a verbal agreement on the key terms of a commercial agreement. These discussions have now concluded satisfactorily, such that Stena wrote to the SoS on 3 October 2025 withdrawing their objection to the application.

Morecambe Offshore Windfarm Ltd (company number: SC734062), 4th Floor, 115 George Street, Edinburgh, Midlothian, Scotland, EH2 4JN

¹ EN010121-001357-SoS all IP consultation Morecambe OWGA - 5 Sept 25.pdf

² <u>Documents | Morecambe Offshore Windfarm Generation Assets</u>

³ EN010121-001336-Morecambe Offshore Wind Farm - Information Request 1- August 2025.pdf

⁴ EN010121-001344-C1-008 - JNCC.pdf

⁵ EN010121-001348-C1-011 - The Applicant's Response to Secretary of State Letter and Request for Information - to be stitched.pdf

Spirit Energy

In response to the Secretary of State's information request, the Applicant and Spirit Energy provided a joint update (information request (C1-011), Section 9.3 paragraph 88), which explained the parties "have engaged post-examination to understand the extent to which each of the Party's activity programmes may align in order to establish if an opportunity exists that would allow the progression to co-existence conversations, and have moved into co-existence conversations." These conversations continue on a without prejudice basis.

The Applicant has also worked to refine and tailor its design and programme to further facilitate co-existence (and also reflect the now settled position on Protective Provisions with Harbour Energy in relation to their assets).

In relation to the request by the Secretary of State in their letter of 26 September for "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" to be provided by 10 October (and mindful of the decision deadline of 23 October), the Applicant remains hopeful of substantive progress towards a commercial agreement, but anticipates submitting protective provisions on 10 October. To assist with comparison and for transparency, the Applicant anticipates these will be presented as a mark-up of drafts submitted by Spirit Energy at Deadline 5A, it is hoped in agreed form or with a joint position on remaining points of disagreement.

For the avoidance of doubt the Applicant will be submitting a separate response to the Secretary of State's request for information set out in the letter dated 26 September 2025⁶ (Consultation 3).

Yours faithfully,



For and on behalf of Morecambe Offshore Windfarm Ltd Oliver Gardner Consent Manager (Morecambe Generation)

⁶ EN010121-001370-Morecambe Offshore Wind Farm - Information Request - Sep 25.pdf