

COUNCIL BUSINESS COMMITTEE

Morecambe Offshore Wind Farm - Consultation 1 June 2023 Report of Chief Officer – Planning and Climate Change

PURPOSE OF REPORT

To allow the Committee to consider the proposed statutory consultation response regarding the Morecambe Offshore Wind Farm development project.

This report is public.

RECOMMENDATIONS

- (1) That the statutory consultation response be agreed and formally submitted.

1.0 Introduction and Statutory Process

- 1.1 Morecambe Offshore Wind Farm is a Nationally Significant Infrastructure Project (NSIP) that is being proposed by Flotation Energy Ltd and Cobra.
- 1.2 NSIPs can include proposals for major new roads, railways, harbours, power stations and significant energy infrastructure installations. Under the Planning Act 2008, NSIPs require a type of consent known as 'Development Consent'. Because of their strategic national importance, the assessment and consideration of Development Consent is the responsibility of the Government's Planning Inspectorate.
- 1.3 There are six stages to the NSIP process. The first of these stages is Pre-Application, and this is the current stage of the Morecambe Offshore Wind Farm project. The developers have a statutory duty to carry out public consultation on their proposals. The Morecambe Offshore Wind Farm consultation opened on 19 April 2023, and closes on 4 June 2023 (<https://morecambeandmorgan.com/morecambe/en/>).

2.0 Proposal Details

- 2.1 The proposed Wind Farm will be located approximately 30 kilometres from the Lancashire coastline at its nearest point. The turbines would be visible when looking in a south-westerly direction from our coast. They are proposed to be sited further south than Fleetwood, and hence would be some distance from Morecambe Bay.
- 2.2 The exact layout of the project is still being developed and will not be finalised until the project has completed the NSIP stages. Currently the project would deliver up to 40 wind turbines, measuring between 296 metres and 345 metres above the highest astronomical tide. The proposed rotor diameter of each turbine would be between 220 and 300 metres. Each turbine would rotate between 6 and 10 times per minute, and the blades of the turbine would be at least 22 metres above sea level. The project

would include up to two offshore substation platforms which would be approximately 80 metres in length, 55 metres in width and 65 metres in height. The width of cable disturbance beneath the seabed would be 25 metres, and the total length of array cabling is 110 kilometres.

2.3 The consultation literature includes a number of existing and proposed viewpoints along the north west coastline, ranging from South Walney in Cumbria to Great Orme's Head in North Wales. The single viewpoint in the Lancaster District is from Heysham Head, and this has been attached to this report and is evaluated in Section 5.

2.4 When fully operational the Morecambe Offshore Wind Farm is anticipated to generate a capacity of 480MW and produce renewable power for over 500,000 homes in the UK.

3.0 Other Proposed Offshore Windfarm Projects

3.1 There are three other offshore wind farm projects which are currently subject to statutory consultation. However, these have a very negligible or zero impact upon the Lancaster District and the City Council is not a consultee on these other proposals.

3.2 However, for completeness only, the other projects are:

- A Transmission Assets consultation, which proposes indicative landfall areas where offshore cables are brought ashore and are connected to the onshore cable network. This landfall area would be outside our district, reaching shore south of Blackpool and north of Lytham St Annes. The infrastructure would progress through an indicative onshore cable corridor towards a substation at Penwortham, Preston.
- Morgan Offshore Wind Farm, which is a joint venture between BP and Energie Baden Wurttemberg to develop a wind farm in the Irish Sea. The Morgan Wind Farm would be closer to the Isle of Man (22 kilometres approximately) than the north west coast (36 kilometres), with similar turbine dimensions to the Morecambe Offshore Wind Farm. The Morgan proposals are for upto 107 wind turbines and four offshore substation platforms.
- Mona Offshore Wind Farm, which is also a joint venture by BP and Energie Baden Wurttemberg for upto 107 wind turbines, again with similar dimensions. This proposal is closer to Anglesey (28.2 kilometres) than the north west coast (39.9 kilometres).

4.0 Details of Consultation

4.1 Lancaster City Council is a consultee and is not a decision-maker in the NSIP process. The developers are undertaking statutory public consultation which includes 19 in-person consultation events and 1 online webinar, and formal Notices placed in all relevant regional, national and trade press. It is not for the City Council to evaluate the extent of this statutory consultation process.

4.2 The latter stages in the NSIP process also include a public right to register to become an 'Interested Party' and present further written representations.

5.0 Assessment

- 5.1 The visual impacts upon the Lancaster District are considered to be not significant. The developer has produced a Seascape, Landscape and Visual Impact Assessment which provides two montage and wireframe plans illustrating the proposed turbine positions and heights. For comparison purposes, the montage includes the existing offshore wind turbines. Visual 2a indicates 20 turbines at a maximum height scenario, whilst Visual 2b indicates the maximum of 40 turbines but at a lesser height.
- 5.2 The viewpoint from Heysham Head is a sensitive one due to the vast expanse of Morecambe Bay and the location of informal paths at Heysham Barrows which allows residents and visitors to enjoy the view.
- 5.3 The upper sections of the turbines and their rotors would be visible on the horizon even at their smaller proposed height, but would comprise small-scale elements in the view due to the long distances involved. The distance is such that 'very good' or 'excellent' visibility is likely to be required for the turbines to be visible. In relation to Heysham Head, where the nearest turbines would be located just over 46km away, the frequency of the turbines being visible is approximately 17%, relying on Met Office data. Given the distances involved, Lancaster City Council considers that the project will not have a significant impact in seascape, landscape or visual terms.
- 5.4 The wind farm falls within the Morecambe Bay Special Area of Conservation, Sefton Coast Special Area of Conservation, West of Copeland Marine Conservation Zone (MCZ), West of Walney Marine Consultation Zone and Fylde Marine Consultation Zone. The Environmental Statement (ES) examines the wider physical process that may affect marine species. The assessment considers the potential effects on waves, tidal current and the movement of sediment. During construction there is the potential for foundation and cable installation to disturb the sediment, resulting in suspended sediments in the water column. The largest extent of sediment transport is the spring tide (10km) however would be small scale and have localised temporary effects.
- 5.5 Benthic ecology (the ecology found at the lowest level of the sea) is a key issue, and seabed surveys have been undertaken across the windfarm site. These survey results were then used to produce a habitat map to inform the assessment. Species and habitats of conservation importance were found to be sufficiently distant from the windfarm site, so any significant potential impacts are expected to be unlikely. Additional survey data is required to examine the potential effects of harbour porpoise and harbour seal, but this will be explored further as part of the Development Consent Order process. There is a commitment from the applicants to undertake this work.
- 5.6 The potential effects on offshore ornithology have been minimised through project design, as the scheme is located outside any designated areas of importance for bird populations. The potential impacts are more likely during the construction and the decommissioning stages of the project. The operational wind farm could cause some disturbance, displacement and barrier effects. In isolation the scheme is not likely to result in significant effects, however there is the potential for cumulative effects (with other schemes) for displacement and collision risk during the operational stages. The overall effects are considered to be no greater than 'minor adverse', with the exception of impacts upon the great black backed gull which is potentially significant. Further survey work is ongoing to establish the impact on this species.
- 5.7 The consultation literature includes a Habitats Regulations Assessment (HRA). Habitats and species of international nature conservation importance have historically been protected by the European Directive (92/43/EEC) of the Conservation of Natural Habitats and Wild Flora and Fauna (The Habitats Directive). This was transposed into British law via the Conservation of Habitats and Species Regulations 2017. Following

the UK's withdrawal from the European Union, a number of amendments have been made to the Conservation of Habitats and Species Regulations (2017) to ensure that they remain operable post January 2021. Most of these changes involve transferring functions from the European Commission to the appropriate authorities in England and Wales.

- 5.8 The amended regulations continue to identify a national site network comprising protected sites previously identified as part of the EU's Natura 2000 ecological network. The national site network includes Special Areas of Conservation (SACs), and Special Protection Areas (SPAs). Ramsar sites (i.e. a wetlands site considered internationally important, named after the location of the treaty which was signed in Ramsar, Iran) are similarly protected despite not being identified in the ecological network. Government policy statements have been issued making clear that they should be afforded the same level of protection afforded to SPAs and SACs.
- 5.9 Under the Regulations, an assessment is required where a plan or project may give rise to significant effects upon a protected site. The overarching aim of HRA is to determine, in view of a site's conservation objectives and qualifying interests, whether a plan or project, either in isolation and/or in combination with other plans would have a significant adverse effect on a designated site. If the screening concludes that a significant adverse effect is likely, then an Appropriate Assessment must be undertaken to determine whether there will be adverse effects on site integrity.
- 5.10 A number of European sites are located in close proximity to the proposed application site. The Morecambe Bay and Duddon Bay Estuary SPA and Ramsar site lies approximately 26km from the wind farm site. The main impact pathway in relation to these sites was found to be in relation to potential impacts to breeding and migratory birds, specifically the herring gull, lesser black-backed gull and sandwich tern.
- 5.11 The assessment reveals that there would be no measurable effects on sandwich terns or herring gulls and therefore no adverse impact on the integrity of the Morecambe Bay SPA. Following further analysis of data and consideration of potential mortality rates, it was concluded that predicted increases in the mortality rate of lesser black-backed gull (potentially 1.7% during the breeding season) would not adversely affect the integrity of the Morecambe Bay and Duddon Estuary SPA and Ramsar site.
- 5.12 The HRA Screening Report also concludes that having considered the supporting evidence there would be no adverse effect on the integrity of the Morecambe Bay and Duddon Estuary SPA and Ramsar, when considering the project in combination with other plans or projects. This assessment will be updated as part of the formal Development Consent Order submission, assisted by the inclusion of two full years of survey data.
- 5.13 The assessment also considers the impacts upon commercial fisheries. Key fleets in the assessment include UK (inc. Isle of Man), Irish Scallop dredgers, UK potters targeting shellfish (whelk, lobster and brown crab) and some localised inshore trawling brown shrimp. There are some significant effects for the UK potting fleet in relation to a reduction of access and displacement impacts during the construction and decommissioning stages. Additional mitigation is proposed following Fisheries Liaison with Offshore Wind and Wet Renewables (FLOWW). This could include evidence-based disturbance payments to reduce the effects to 'minor adverse' or lower. These are not considered significant in Environmental Impact Assessment terms. The developer indicates that discussions will continue with relevant commercial fishery stakeholders.

- 5.14 Shipping and navigation effects (people and goods) are also considered. Vessel movements relating to oil and gas infrastructure account for a large proportion of activity within the locality. The main operators in the Irish Sea include the Isle of Man Steam Packet Company who operate between Douglas, Liverpool and Heysham; Seatruck, who operate between Heysham, Liverpool, Dublin and Warrenpoint; and P&O, who operate between Liverpool and Dublin. Significant effects were not identified in relation to commercial fishing and shipping. However, effects, and cumulative effects (considering other projects in the Irish Sea) and the mitigations required, will need to be further assessed and discussed with stakeholders. Of the routes identified above, only the Liverpool to Douglas Ferry and the Liverpool to Belfast routes would be affected, and Lancaster City Council will offer no observations regarding the impact on these routes outside our district.
- 5.15 There is the potential for the rotating turbine blades to cause interference to the civil and military aerodromes to their Primary Surveillance Radar. A range of mitigation measures are embedded in the project design to reduce potential aviation effects. Technical solutions are available and such solutions will be agreed with the affected operators. Discussions between the developer and Blackpool Airport are ongoing.
- 5.16 Climate change has been considered in the ES, and the assessment includes a greenhouse gas assessment to determine the emissions associated with the delivery and operation of the project. Unsurprisingly, the data indicates that the construction stage will incur the highest levels of greenhouse gas emission, but that the operational period will deliver considerable beneficial effects. For example, during the project lifespan there will be significant greenhouse gas savings when compared to the energy produced from non-renewable sources. This is estimated to amount to an equivalent saving of approximately 36 million tonnes CO₂. The project would therefore support the UK's transition to a low-to-zero carbon generation energy mix.
- 5.17 The consultation literature also includes a socio-economic, tourism and recreation assessment. There have been no significant impacts predicted on the tourism economy, including any tourism assets within the Lancaster District.
- 5.18 An assessment of activities which may affect a person's physical or mental health during the construction, operation, maintenance and decommissioning of the project, has been undertaken. The assessment is hindered by the fact that there is, at this stage, no confirmation regarding which port would service the project. This means that the Human Health assessment does not yet consider, in any great detail, the implications for human health at the relevant port. Whilst no significant effects are expected, there will need to be a separate Health Impact Assessment once a port has been selected. Benefits are anticipated during the operational stage, relating to the positive impacts of climate mitigation and the public health improvements derived from access to clean and secure energy.
- 5.19 An assessment on the historical landscape and seabed features of archaeological interest, such as wrecks of either maritime or aviation origin has been undertaken. A number of seabed features of low and medium archaeological have been identified. There is the potential for the presence of further maritime and aviation archaeological to be present, which has not been identified in the geophysical data. The applicants propose to address this via the submission of a written scheme of investigation as part of the Development Consent Order submission.

6.0 Options and Options Analysis (including risk assessment)

6.1 The options that are available are:

	Option 1: To respond to the consultation with a letter of support, caveated so as the City Council is consulted again should the proposals be amended	Option 2: To respond to the consultation with other comments	Option 3: To not submit a response to this consultation
Advantages	The views of the Council will be considered by Government when the proposals are advanced through the NSIP process.	The views of the Council will be considered by Government when the proposals are advanced through the NSIP process.	None
Disadvantages	None.	None.	The formal opinion of Lancaster City Council would not be provided, and an opportunity to contribute to the proposals would be lost.
Risks	None.	None.	None

7.0 Officer Preferred Option (and comments)

7.1 The preferred option is Option 1, to respond to the consultation with support for the project, with the caveat described in the above table.

8.0 Conclusion

8.1 The project would deliver significant benefits in the country's ambitions to reduce greenhouse gas emissions to reach Net Zero. It would make use of an area of coastline that already accommodates offshore wind turbines and can optimise generation capacity. The impacts described in this report are negligible for the reasons provided. It is therefore considered that Lancaster City Council provides a letter of support for the principle of the Morecambe Offshore Wind Farm, with a caveat that the City Council is consulted again should the proposals be subject to further amendment..

CONCLUSION OF IMPACT ASSESSMENT (including Health & Safety, Equality & Diversity, Human Rights, Community Safety, Sustainability and Rural Proofing):

The proposal would support the UK's Energy Security Strategy and deliver a significant increase in offshore wind energy, helping to contribute towards the country's Net Zero ambitions.

Responding to the consultation is Lancaster City Council's opportunity to support the principle of offshore renewable energy generation.

LEGAL IMPLICATIONS

None arising from this consultation.

FINANCIAL IMPLICATIONS

None arising from this consultation.

OTHER RESOURCE IMPLICATIONS, such as Human Resources, Information Services, Property, Open Spaces

None.

SECTION 151 OFFICER'S COMMENTS

[Insert Section 151 Officer comments here]

MONITORING OFFICER'S COMMENTS

[Insert Monitoring Officer's comments here]

BACKGROUND PAPERS

Chapter 18 Seascape, Landscape and Visual Impact Assessment Figures – 2a Visuals

Chapter 18 Seascape, Landscape and Visual Impact Assessment Figures – 2b Visuals

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