

MORGAN OFFSHORE WIND PROJECT: GENERATION ASSETS

Deadline 6 Cover Letter

Deadline: 6

Application Reference: EN010136

Document Number: MRCNS-J3303-RPS-10238

Document Reference: S_D6_1

27 February 2025

F01



Image of an offshore wind farm

Document status

Version	Purpose of document	Authored by	Reviewed by	Approved by	Review date
F01	Deadline 6	Morgan Offshore Wind Limited	Morgan Offshore Wind Limited	Morgan Offshore Wind Limited	February 2025

Prepared by:	Prepared for:
Morgan Offshore Wind Limited	Morgan Offshore Wind Limited

27 February 2025

The Planning Inspectorate
National Infrastructure Directorate
Temple Quay House, Temple Quay
Bristol, BS1 6PN

Dear Madam / Sir,

Planning Act 2008

The proposed Morgan Offshore Wind Project: Generation Assets

PINS Reference: EN010136

Morgan Offshore Wind Limited (the Applicant) encloses its submission for the Deadline 6.

Early submissions on Monday 24th February

The Applicant shared the following documents with the Planning Inspectorate, Natural England, the Marine Management Organisation and Natural Resources Wales on Monday 24th February:

- Volume 1, Chapter 3: Project description F02 (Clean and Tracked) (S_D6_15)
- Volume 2, Chapter 1: Physical processes F02 (Clean and Tracked) (S_D6_16)
- Volume 2, Chapter 4: Marine Mammals F04 (Clean and Tracked) (S_D6_19)
- Volume 2, Chapter 2: Benthic subtidal ecology F02 (Clean and Tracked) (S_D6_17)
- Underwater Sound Management Strategy F03 (Clean and Tracked) (S_D6_30)
- Outline marine mammal mitigation protocol F04 (Clean and Tracked) (S_D6_31)
- Outline Offshore Operations and Maintenance Plan F02 (S_D6_32)
- Commitments register F05 (S_D6_33)
- Offshore In Principle Monitoring Plan F04 (S_D6_34)

These documents were submitted early to assist Natural England with finalising its own Deadline 6 submissions. The Planning Inspectorate provided feedback that the early submission will be uploaded together with the rest of the Applicants Deadline 6 submission after Deadline 6 on 27th February, therefore the Applicant has not re-submitted these documents in this Deadline 6 submission pack

submitted on 27th February. As requested by the Planning Inspectorate the Applicant has added the Track Change versions of the following documents to the Deadline 6 submission pack:

- Outline Offshore Operations and Maintenance Plan F01_F02_Tracked (S_D6_32)
- Commitments register F04_F05_Tracked (S_D6_33)
- Offshore In Principle Monitoring Plan F03_F04_Tracked (S_D6_34)

Further the Applicant received updated feedback from the MMO on 25th February 2025, with regard to mitigating any driven piling during the herring spawning season and has updated the Underwater Sound Management Strategy F03 (S_D6_30) accordingly (with the wording agreed by the MMO). The updated Underwater Sound Management Strategy has been submitted as F04 with reference number S_D6_30.1 in the Deadline 6 submission pack and supersedes the Underwater Sound Management Strategy F03 (S_D6_30) submitted on Monday 24th February, 2025.

DCO amendment requests

The Applicant has received intimation from several Interested Parties (including the MMO, Blackpool Airport and BAE Systems) that they intend to request amendments to the draft DCO that have not been submitted at any previous deadline. The Applicant considers that, as a matter of procedural fairness, it should be afforded an opportunity to comment on any new wording proposed. Therefore, if any party submits a requested amendment at Deadline 6 that includes new DCO wording, the Applicant requests that the Examining Authority issues a request under Rule 17 that invites the Applicant to respond.

Deadline 6 submission

Please find below an overview of key documents included within this submission.

Application Guide

The Applicant has provided an updated version (clean and tracked) of the Application Guide (F09) (S_D6_2) for Deadline 6.

Applicant's response to IP submissions made at Deadline 5

The Applicant has responded to IP submission submitted at Deadline 5. The response is included in document 'S_D6_3: Applicants response to IP submission at Deadline 5'. The document is accompanied by five annexes:

- Annex 3.1: Applicants response to IP submissions at Deadline 5: Orsted IP (S_D6_3.1)
- Annex 3.2: Applicants response to IP submissions at Deadline 5: Harbour Energy (S_D6_3.2)
- Annex 3.3: Helicopter Access Report – Additional flight data analysis (S_D6_3.3)
- Annex 3.4: Helicopter Access Report – Additional Meteorological Analysis (S_D6_3.4)
- Annex 3.5: Response to Natural England ExQ2 MM2.10 submission: Sub bottom profile surveys - clarification note (S_D6_3.5)

Applicant's response to EXQ2

In the Examining Authority's second written questions they requested several documents be updated at Deadline 6 (within questions DCO 2.7, DCO 2.13 and IN F2.1). The Applicant has submitted the updated Project Description Chapter (S_D6_15) , draft DCO (S_D6_10) and Commercial Side Agreements Tracker (S_D6_14) as requested.

Applicant's response to Hearing Action Points (HAP) from ISH2 & ISH3

The Applicant has responded to remaining HAP of ISH2 as well as HAP of ISH3 in document 'S_D6_4: Applicants response to HAP from ISH2 & ISH3'. The document is accompanied by Annex 4.1 to the Applicant's response to Response to HAP from ISH2 & ISH3 HAP_ISH3_10 (S_D6_4.1).

ISH3 Hearing summary

The Applicant has provided the hearing summary of ISH3 in document 'S_D6_5: Written Summaries-Issue Specific Hearing 3'.

Comments on the Report on the Implications for European Sites

The Applicant has provided comments on the Report on the Implications for European Sites (S_D6_6: Applicants Comments on the RIES).

Closing statement

The Applicant has provided the closing statement in document 'S_D6_7: Closing Statement'

The final draft DCO

The Applicant has submitted the final draft DCO (S_D6_10) in clean and track versions. A Word file of the final draft DCO is also provided. The Explanatory Memorandum has been updated and submitted in clean and tracked versions (S_D6_11). A final Schedule of Changes to the Draft DCO (S_D6_12) is also submitted. Further the final Draft development consent order validation report (S_D6_13) has been submitted.

Statements of Common Ground

The Applicant has continued to progress Statements of Common Ground (SoCG) with the majority of the Interested Parties identified by the Examining Authority in its Rule 6 letter. For Deadline 6 the Applicant has submitted the following signed SoCGs:

- SoCG NRW
- SoCG RSPB
- SoCG MMO
- SoCG Other Fisheries (OF):
 - Scottish Fishermen's Federation (SFF) (representing Scottish Pelagic Fishermen's Association, Scottish White Fish Producers Association and West Coast Sea Products Ltd) and Anglo-North Irish Fish Producers Organisation (ANIFPO)
- SoCG Maritime and Coastguard Agency (MCA)

-
- SoCG United Kingdom Chamber of Shipping (UKCoS)
 - SoCG Isle of Man Government (Territorial Sea Committee) (IoMTSC)
 - SoCG Isle of Man Steam Packet Company (IoMSPC)
 - SoCG Stena Line (STENA)
 - SoCG Moir Vannin (MV)
 - SoCG Trinity House (TH)
 - SoCG Historic England (HE)
 - SoCG Ronaldsway Airport (RNLDWY)
 - SoCG BAE Systems / Walney and Warton Aerodromes
 - SoCG Defence Infrastructure Organisation (DIO) / MoD Safeguarding (including RAF Valley aerodrome)
 - SoCG Blackpool Airport (BA)

The Applicant has not been able to reach a final signed SoCG by Deadline 6 with the following Interested Parties:

- SoCG Harbour Energy
 - The Applicant has not progressed a SoCG with Harbour Energy for Deadline 6, given that the Applicant and IP's views are clearly stated in the responses to Deadline 5. The Applicant has also provided further consideration of the IP's Deadline 5 response in the current submissions. The Applicant feels that both parties positions are clearly stated in these written submissions. Despite this, further meetings are scheduled week commencing 3 March. Engagement with Harbour Energy is therefore ongoing, and should further agreement be achieved on matters this will be communicated to the Examining Authority.
- SoCG Orsted IPs (OIPs)
 - As discussed during ISH3, due to a lack of engagement from Orsted IPs on the SoCG and the fundamental differences between the parties, it has not been possible to submit a Final SoCG at Deadline 6. The Applicant considers that both party's position is clearly stated in their written submissions and a further iteration of the SoCG would not provide further clarity or areas of agreement. On 21 February 2025, the Applicant and Orsted IPs agreed not to submit a Final signed SoCG.

A letter of Comfort was submitted at Deadline 1 for Manx National Heritage (REP1-036). The signed SoCG with NFFO was submitted at Deadline 5 (REP5-053). The signed SoCG with NATS was submitted at Deadline 5 (REP5-052).

The Joint Nature Conservation Committee have confirmed that it will defer to Natural England in this application and so would not progress a separate Statement of Common Ground. However, JNCC have responded to ExA questions and have confirmed their conclusion of no adverse effects on integrity both alone and in-combination for all European sites.

Natural England has continued to progress their Risk and Issues Log throughout Examination instead of a SoCG (as is their standard practice) and Natural England will submit their Principal Areas of Disagreement at Deadline 6. The Applicant has made significant progress to resolve all matters raised including confirmation of a conclusion of no adverse effects on integrity for all European sites. The Applicant expects the substantial progress will be reflected in the final Risk and Issues Log submitted at Deadline 6.

Irish South and East Fish Producers' Organisation (ISEFPO) has not engaged any further during the examination or SoCG process and the Applicant understands that the Northern Ireland Fish Producers Organisation (NIFPO) will be making their own submission at Deadline 6.

Updated application documents

The Applicant has also submitted the following updated Application documents:

- Volume 1, Chapter 3: Project description (Clean and Tracked) (S_D6_15) (included in early submission on 24th February) (included in early submission on 24th February)
- Volume 2, Chapter 1: Physical processes (Clean and Tracked) (S_D6_16) (included in early submission on 24th February) (included in early submission on 24th February)
- Volume 2, Chapter 2: Benthic subtidal ecology (Clean and Tracked) (S_D6_17) (included in early submission on 24th February) (included in early submission on 24th February)
- Volume 2, Chapter 3: Fish and shellfish (S_D6_18) – Only Errata Sheet added
- Volume 2, Chapter 4: Marine Mammals (Clean and Tracked) (S_D6_19) (included in early submission on 24th February) (included in early submission on 24th February)
- Volume 2, Chapter 5: Offshore ornithology (S_D6_20) – Only Errata Sheet added
- Volume 2, Chapter 7: Shipping and navigation (S_D6_21) – Only Errata Sheet added
- Volume 2, Chapter 9: Other sea users (S_D6_22) – Only Errata Sheet added
- Volume 2, Chapter 10: Seascape, landscape and visual resources (S_D6_23) – Only Errata Sheet added
- Volume 2, Chapter 13: Socio-economics (S_D6_24) – Only Errata Sheet added
- Volume 4, Annex 5.3: Offshore ornithology collision risk modelling technical report (S_D6_25) – Only Errata Sheet added
- Volume 4, Annex 5.5: Offshore ornithology apportioning technical report (S_D6_26) – Only Errata Sheet added
- Volume 4, Annex 6.1: Commercial fisheries technical report (S_D6_27) – Only Errata Sheet added
- Volume 4, Annex 7.1: Navigational risk assessment (S_D6_28) – Only Errata Sheet added
- Underwater Sound Management Strategy F04 (Clean and Tracked) (S_D6_30.1) (supersedes the S_D6_30 Underwater Sound Management Strategy F03 submitted on 24th February in early submission)
- Outline marine mammal mitigation protocol (Clean and Tracked) (S_D6_31) (included in early submission on 24th February)

-
- Outline Offshore Operations and Maintenance Plan (Clean and Tracked) v (S_D6_32) (included in early submission on 24th February, only Track Change version included in Deadline 6 submission pack on 27th February)
 - Commitments register (former MMS) (Clean and Tracked) (S_D6_33) (included in early submission on 24th February, only Track Change version included in Deadline 6 submission pack on 27th February)
 - Offshore In Principle Monitoring Plan (Clean and Tracked) (S_D6_34) (included in early submission on 24th February, only Track Change version included in Deadline 6 submission pack on 27th February)
 - Outline Vessel Traffic Management Plan (S_D6_35)
 - Outline fisheries liaison and co-existence plan (Clean and Tracked) (S_D6_45)
 - Relationship of Plans (S_D6_36)
 - HRA stage 2 ISAA part 3 - SPA and Ramsar site assessment (S_D6_43)- Only Errata Sheet added
 - HRA Stage 1 Screening report (S_D6_44)- Only added Errata Sheet added

Other updated documents

Further, the Applicant has also updated and submitted the following documents:

- Final Examination Progress Tracker/Statement Commonality (S_D6_8)
- Final Report on interrelationship with other infrastructure projects (S_D6_9)
- Final Commercial Side Agreements Tracker (S_D6_14)
- Calculation of Net Effects on Greenhouse Gas Emissions (Clean and Tracked) (S_D6_41)
- Project alone and cumulative assessment for the Great Orme's Head SSSI (S_D6_40)

Additional documents and files

The following new documents and files have been submitted by the Applicant:

- Review of Cumulative Effects Assessment and In-Combination Assessment at Deadline 6 (S_D6_29)
- Appendix to Ornithological assessment clarification data (REP5-035) - Explanatory note to support SNCB and Applicant workbooks (S_D6_37.1)
- Annex 16.4 to Ornithological assessment clarification data (REP5-035) - Applicant's parameters (English sites) (S_D6_37.2)
- Annex 16.5 to Ornithological assessment clarification data (REP5-035) - Applicant's parameters (Welsh sites) (S_D6_37.3)
- Assessment of Gannet at the Grassholm SPA (S_D6_38)
- Population Viability Analysis for the Regional Population of Guillemot (S_D6_39)
- Morgan - Mooir Vannin gap - navigational safety review technical clarification note (S_D6_42)
- Appendix to Offshore Ornithology CEA and In-combination Gap-filling of Historical Projects Note (REP1-010) - CRM Log files (see list below) (S_D6_46)
- Underwater Sound Abatement Modelling: Fish Receptors (S_D6_47)
- Aviation and radar mitigation summary note (S_D6_48)

Files in the folder S_D4_46: Appendix to Offshore Ornithology CEA and In-combination Gap-filling of Historical Projects Note (REP1-010) - CRM Log files

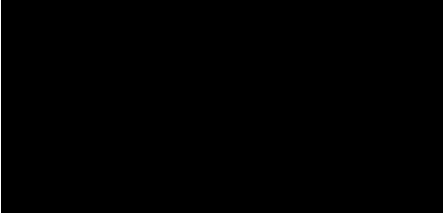
Document Reference	File name
	<i>Burbo_BurboExt</i>
S_D6_46.1	S_D6_46.1_Morgan Gen_Burbo_asbuilt_Black legged Kittiwake_inputs
S_D6_46.2	S_D6_46.2_Morgan Gen_Burbo_asbuilt_Great Black backed Gull_inputs
S_D6_46.3	S_D6_46.3_Morgan Gen_Burbo_asbuilt_Herring Gull_inputs
S_D6_46.4	S_D6_46.4_Morgan Gen_Burbo_asbuilt_Northern Gannet_inputs
S_D6_46.5	S_D6_46.5_Morgan Gen_Burbo_consent_Black Legged Kittiwake_inputs
S_D6_46.6	S_D6_46.6_Morgan Gen_Burbo_consent_Great Black backed Gull_inputs
S_D6_46.7	S_D6_46.7_Morgan Gen_Burbo_consent_Herring Gull_inputs
S_D6_46.8	S_D6_46.8_Morgan Gen_Burbo_consent_Northern Gannet_inputs
S_D6_46.9	S_D6_46.9_Morgan Gen_Burbo_consent_wf_inputs
S_D6_46.10	S_D6_46.10_Morgan Gen_BurboExt_asbuilt_Great Black backed Gull_inputs
S_D6_46.11	S_D6_46.11_Morgan Gen_BurboExt_asbuilt_wf_inputs
S_D6_46.12	S_D6_46.12_Morgan Gen_BurboExt_consent_Great_black backed Gull_inputs
S_D6_46.13	S_D6_46.13_Morgan Gen_BurboExt_consent_wf_inputs
	<i>GBBG_Gw_RR_Rh_Wal1_Wal2_Dud</i>
S_D6_46.14	S_D6_46.14_Morgan Gen_gqynt_asbuilt_Great Black backed gull_inputs
S_D6_46.15	S_D6_46.15_Morgan Gen_gqynt_asbuilt_wf_inputs
S_D6_46.16	S_D6_46.16_Morgan Gen_gwynt_consent_Great Black backed Gull_inputs
S_D6_46.17	S_D6_46.17_Morgan Gen_rhyl_wf_inputs
S_D6_46.18	S_D6_46.18_Morgan Gen_robinrigg_Great Black backed Gull_inputs
S_D6_46.19	S_D6_46.19_Morgan Gen_robinrigg_wf_inputs
S_D6_46.20	S_D6_46.20_Morgan Gen_walney1_Great Black backed Gull_inputs
S_D6_46.21	S_D6_46.21_Morgan Gen_Walney1_wf_inputs
S_D6_46.22	S_D6_46.22_Morgan Gen_Walney2_Great Black backed Gull_inputs
S_D6_46.23	S_D6_46.23_Morgan Gen_walney2_wf_inputs
S_D6_46.24	S_D6_46.24_Morgan Gen_westduddon_Great Black backed gull_inputs
S_D6_46.25	S_D6_46.25_Morgan Gen_westduddon_wf_inputs
	<i>Gwynt_Asbuilt_CRM</i>
S_D6_46.26	S_D6_46.26_Morgan Gen_Gwynt _asbuilt_Windfarm_Black legged Kittiwake_inputs
S_D6_46.27	S_D6_46.27_Morgan Gen_Gwynt_asbuilt_Windfarm_Great Black backed Gull_inputs
S_D6_46.28	S_D6_46.28_Morgan Gen_Gwynt_asbuilt_Windfarm_Herring_Gull_inputs
S_D6_46.29	S_D6_46.29_Morgan Gen_Gwynt_asbuilt_Windfarm_Northern_Gannet_inputs
S_D6_46.30	S_D6_46.30_Morgan Gen_Gwynt_asbuilt_Windfarm_wf_inputs
	<i>Rhyl_94operation</i>
S_D6_46.31	S_D6_46.31_Morgan Gen_Demo_Windfarm_Black legged Kittiwake_inputs
S_D6_46.32	S_D6_46.32_Morgan Gen_Demo_Windfarm_Herring_Gull_inputs
S_D6_46.33	S_D6_46.33_Morgan Gen_Demo_Windfarm_Northern_Gannet_inputs
S_D6_46.34	S_D6_46.34_Morgan Gen_Demo_Windfarm_wf_inputs

	<i>RobinRigg_94operation</i>
S_D6_46.35	S_D6_46.35_Morgan Gen_Demo_Windfarm_Black_legged_Kittiwake_inputs
S_D6_46.36	S_D6_46.36_Morgan Gen_Demo_Windfarm_Herring_Gull_inputs
S_D6_46.37	S_D6_46.37_Morgan Gen_Demo_Windfarm_Lesser_Black_Backed_Gull_inputs
S_D6_46.38	S_D6_46.38_Morgan Gen_Demo_Windfarm_Northern_Gannet_inputs
S_D6_46.39	S_D6_46.39_Morgan Gen_Demo_Windfarm_wf_inputs
	<i>scrm_outputs_1Barrow</i>
S_D6_46.40	S_D6_46.40_Morgan Gen_Barrow_Black_legged_Kittiwake_inputs
S_D6_46.41	S_D6_46.41_Morgan Gen_Barrow_Herring_Gull_inputs
S_D6_46.42	S_D6_46.42_Morgan Gen_Barrow_Northern_Gannet_inputs
S_D6_46.43	S_D6_46.43_Morgan Gen_Barrow_wf_inputs
	<i>scrm_outputs_GBBG_Barrow</i>
S_D6_46.44	S_D6_46.44_Morgan Gen_Demo_Windfarm_Great_black_backed_Gull_inputs
S_D6_46.45	S_D6_46.45_Morgan Gen_Demo_Windfarm_wf_inputs
	<i>scrm_outputs_GBBG_Hoyle</i>
S_D6_46.46	S_D6_46.46_Morgan Gen_Demo_Windfarm_Great_Black_backed_Gull_inputs
S_D6_46.47	S_D6_46.47_Morgan Gen_Demo_Windfarm_wf_inputs
	<i>scrm_outputs_Hoyle</i>
S_D6_46.48	S_D6_46.48_Morgan Gen_Hoyle_Black_legged_Kittiwake_inputs
S_D6_46.49	S_D6_46.49_Morgan Gen_Hoyle_Herring_Gull_inputs
S_D6_46.50	S_D6_46.50_Morgan Gen_Hoyle_Northern_Gannet_inputs
S_D6_46.51	S_D6_46.51_Morgan Gen_Hoyle_wf_inputs
	<i>Walney1_94operation</i>
S_D6_46.52	S_D6_46.52_Morgan Gen_Demo_Windfarm_Black_legged_Kittiwake_inputs
S_D6_46.53	S_D6_46.53_Morgan Gen_Demo_Windfarm_Herring_Gull_inputs
S_D6_46.54	S_D6_46.54_Morgan Gen_Demo_Windfarm_Northern_Gannet_inputs
S_D6_46.55	S_D6_46.55_Morgan Gen_Demo_Windfarm_wf_inputs
	<i>WestOfDS_94operation</i>
S_D6_46.56	S_D6_46.56_Morgan Gen_Demo_Windfarm_Black_legged_Kittiwake_inputs
S_D6_46.57	S_D6_46.57_Morgan Gen_Demo_Windfarm_Herring_Gull_inputs
S_D6_46.58	S_D6_46.58_Morgan Gen_Demo_Windfarm_Northern_Gannet_inputs
S_D6_46.59	S_D6_46.59_Morgan Gen_Demo_Windfarm_wf_inputs
	<i>Walney2_94operation</i>
S_D6_46.60	S_D6_46.60_Morgan Gen_Demo_Windfarm_Black_legged_Kittiwake_inputs
S_D6_46.61	S_D6_46.61_Morgan Gen_Demo_Windfarm_Herring_Gull_inputs
S_D6_46.62	S_D6_46.62_Morgan Gen_Demo_Windfarm_Northern_Gannet_inputs
S_D6_46.63	S_D6_46.63_Morgan Gen_Demo_Windfarm_wf_inputs

Artificial Intelligence (AI)

The Applicant can confirm that Artificial Intelligence has not been used to create or alter any application documents either submitted at application or provided for the Examination to date.

Yours faithfully,



Peter Gaches

Consents Lead

Morgan Offshore Wind Project: Generation Assets