



THE PLANNING ACT 2008

THE INFRASTRUCTURE PLANNING (EXAMINATION PROCEDURE) RULES
2010

Morgan Offshore Wind Farm: Generation Assets

Appendix J6a to Natural England's Deadline 6a Submission

**Natural England's Principal Areas of Disagreement Summary Statement
(PADSS) at Deadline 6a**

For:

The construction and operation of the Morgan Offshore Wind Project: Generation Assets located approximately 37 km from the Northwest English Coast in the Irish Sea.

Planning Inspectorate Reference: EN010136

6th March 2025

Principal Areas of Disagreement Summary Statement (PADSS) at Deadline 6a

This PADSS should be read in conjunction with the Appendices of Natural England's Relevant Representations [RR-026], written presentations and Natural England Deadline 6a Risk and Issues Log, which provide further detail on the areas of disagreement which require resolution. For ease of reference, we have added a RAG rating for each principal area.

The principal issue in question	The brief concern held by Natural England which will be reported on in full in WR / LIR	What needs to change, or be included, or amended so as to overcome the disagreement	RAG rating D1	Has the concern been addressed?	RAG rating D6a
Development Consent Order (DCO) and deemed Marine Licence (dML)					
Maximum parameters of the works are not adequately captured	The DCO and dMLs do not accurately capture important metrics such as the maximum area and volume of scour and cable protection, and the number and size of UXOs that can be detonated.	The Applicant should update the DCO and dMLs to ensure the maximum parameters of all important metrics are appropriately secured.		The issue has been resolved for maximum area, volume of scour and cable protection. However, as the information required to inform the size and number of UXOs is currently not available, we reiterate our advice that UXO clearance (including low order detonations) should not be included as a licensed activity in the DCO. Therefore, this issue remains unresolved at Deadline 6a.	
Pre-construction documentation required at least six months prior to commencement	Due to the increasing complexity of construction of large offshore works, the proposed four month consultation period is no longer appropriate.	The Applicant should amend the dMLs to allow for documents to be submitted at least six months prior to commencement.		This issue has been resolved. Natural England welcomes the update to the DCO condition 20 requiring pre-construction documentation to be submitted at least six months prior to commencement.	
Conditions to require an updated Offshore Operations and Maintenance Plan (OOMP) and secure post construction time	Currently, there is no condition requiring an updated OOMP to be submitted. The condition should also secure that no cable protection should be deployed later than 10 years post construction.	The Applicant should update the dMLs to require an updated OOMP and a maximum period of ten years post construction for cable protection.		Natural England maintains our position that a 10-year time limit for cable protection deployment should be imposed within the DCO. This is in line with our standing advice on cable protection assessment for offshore windfarms and inclusion in marine licenses (Appendix O6).	

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limits for cable protection					
Ecological monitoring conditions	The monitoring conditions included within the dMLs do not secure any ecological monitoring.	Monitoring of benthic, offshore ornithology and marine mammals should be conditioned.		This issue has been partly resolved in that the Applicant has proposed monitoring of marine process and benthic ecology. However, Natural England maintains its position on the need for ecological monitoring for ornithological and marine mammal receptors. Recognising the Applicant takes the opposite view, we are now in an 'agree to disagree' position regarding ornithological and marine mammal monitoring.	
Offshore Ornithology					
Cumulative Effects Assessment (CEA) methodology	The Applicant has undertaken a qualitative assessment of impacts from historic projects without considering quantitative impacts, which Natural England advise is inappropriate. We therefore consider there to be a high level of uncertainty in the Applicant's CEA. Additionally, there are inconsistencies in the data used across the Round 4 Irish Sea offshore wind projects.	Natural England advise that the method previously supplied to the Applicant during pre-application discussions remains our preferred approach, and that this should be adopted across the Irish Sea Round 4 projects, who should also collaborate to establish the use of consistent data.		At Deadline 5, the Applicant submitted agreed impact figures following a methodology advised by Natural England. This resolved our concerns around methodological issues associated with the Applicant's assessments presented in the ES. Therefore, this issue has been resolved.	
Collision Risk Modelling (CRM), displacement assessments and	Natural England have outstanding concerns relating to both the CRM and displacement assessments and subsequent	Greater clarity and transparency is required on the results of assessments, and how these are used in later stages (e.g.		At Deadline 5, the Applicant submitted agreed impact figures following a methodology advised by Natural England. This resolved our concerns around	

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subsequent apportioning	apportioning undertaken by the Applicant. These currently preclude any consideration of the Applicant's EIA and HRA conclusions.	apportioning), especially with respect to CRM parameters. Furthermore, we consider that the full range of SNCB advised displacement and mortality rates must be considered when apportioning impacts.		methodological issues associated with the Applicant's assessments presented in the ES. Therefore, this issue has been resolved.	
Marine Mammals					
Use of Noise Abatement Systems as mitigation	Natural England strongly advises the Applicant to commit to using noise abatement (NAS) as mitigation during construction.	We strongly recommend that the Applicant fully commits to using NAS as mitigation measure to reduce both injury and disturbance to marine mammal receptors during construction activities (i.e. piling and high order UXO clearance).		NE welcomes the Applicant's submission of the updated MMMP, IPMP, UWSMS and Marine Mammal Chapter at Deadline 6. We can confirm that the Applicant has committed to the use of NAS in-line with the Defra noise policy paper. The Applicant has also secured a commitment to the use of NAS if piling is required within the DCO.	
Benthic Ecology and Physical Processes					
EIA assessments for benthic ecology and physical processes.	Natural England advise that the following potential pressures/impacts have not been considered/assessed or that further information is required: WCS/MDS parameters are not described and assessed (as detailed in Appendix D); - Boulder clearance; - UXO clearance;	Natural England advises that an updated ES is submitted which includes and assess these pressures/impacts with respect to benthic ecology and marine processes as required.		NE welcomes the Applicant's submission of the updated Physical Processes ES Chapter into examination at Deadline 6. We can confirm that updates have been made to the MDS parameters and assessments. In most cases, NE now agrees with the Applicant's position on WCS. However, it should not be taken as read that the approach taken by the Applicant to determine and assess WCS would be acceptable for other projects.	

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	<ul style="list-style-type: none"> - Impacts of seabed scour due to the presence of windfarm infrastructure during the operation and maintenance phase; and - Impacts due to cable and infrastructure repair during the operation and maintenance phase. 				
Lack of decommissioning proposals	Natural England has concerns that the Applicant has not committed to endeavour to return the seabed to its original state at the end of the project.	Natural England advises that the Applicant should produce a draft decommissioning plan that outlines all decommissioning options (maintain, full removal and partial removal), and that an updated plan is secured in the dML.		Natural England notes that a draft decommissioning plan was not submitted into examination. Natural England does not agree that the use of the wording "consideration will be given" to the use of scour/cable protection that is removable at decommissioning. Our view is that this wording does not secure this condition. For this to be resolved, the wording should state that scour/cable protection that is removable at decommissioning 'will' be used. This issue has not been resolved by Deadline 6a.	
Fish and Shellfish Ecology					
Use of Soft Starts and ramp ups as mitigation for fish species	Natural England does not agree with the use of the Marine Mammal Mitigation Protocol (MMMP) methods of soft starts and ramp ups as a means of mitigation for fish species.	Do not include these measures as appropriate mitigation for impacts to fish species.		Natural England does not agree with the use of soft starts and ramp ups as a means of mitigation for fish species. However, Natural England consider this issue to be sufficiently minor for it not to hinder us from drawing impact assessment conclusions, so this issue has been down-rated to Yellow.	