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Your Ref: EN010136

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Date 2 July 2025

Er sylw / For the attention of: [REDACTED]

Annwyl / Dear [REDACTED]

## **Planning Act 2008 and The Infrastructure Planning (Examination Procedure) Rules 2010**

### **Application by Morgan Offshore Wind Limited (“the Applicant”) for an Order granting Development Consent for the proposed Morgan Offshore Wind Project: Generation Assets (“the Proposed Development”)**

#### **REQUEST FOR INFORMATION**

Thank you for your Information request letter, dated 19 June 2025, requesting information from Cyfoeth Naturiol Cymru / Natural Resources Wales’ regarding the above.

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 Morgan Offshore Wind Limited (‘the Applicant’), the Secretary of State Secretary of State for Energy Security and Net Zero, or other Interested Parties.

Please find below, Natural Resources Wales’ (NRW)’s response to the question directed at us in the Request for Information letter:

#### **Updates in respect of Habitats Regulation Assessment (“HRA”) matters**

**13. Noting that further HRA information was submitted by the Applicant and Appropriate Nature Conservation Bodies at Deadline 6 following publication of the Report on the Implications for European Sites, the Secretary of State invites the Applicant, Natural England, NRW(A), the JNCC and the RSPB to provide any final comments on that further information.**

#### **With Regards to Marine Ornithology:**

As noted in NRW’s response [AS-012], we confirmed that an Adverse Effect on Site Integrity (AEoSI) could be ruled out for the project alone and in-combination for all relevant

Welsh SPAs/Ramsars. In paragraph 4 of our Deadline 6 response [REP6-101] we also confirmed that the Applicant's updated summary spreadsheet for Welsh SPAs [AS-013] contains the same figures/information as the version previously sent to NRW by the Applicant (27/01/2025) and therefore our advice remains the same [AS-012]. Therefore, our advice remains unchanged, and we are able to agree no AEoSI from the Morgan Generation Assets project alone and in-combination for any features of any Welsh SPAs/Ramsar sites.

We note that new conservation advice packages (available [here](#)) and condition assessments (available [here](#)) have recently been produced for Welsh SPAs, including for Grassholm SPA and Aberdaron Coast and Bardsey Island SPA (note new packages have not been produced for cross border sites such as Skomer, Skokholm and seas off Pembrokeshire SPA). These new packages do not result in a change of our previous advice at Morgan that an AEoSI can be ruled out for Aberdaron Coast and Bardsey Island SPA Manx shearwater (as set out in Section 2.6 of AS-012).

The new packages have resulted in the Grassholm SPA gannet conservation objectives being made more comprehensible. We note that the Morgan Applicant based their assessment on the decreased 2023 Grassholm gannet colony count (i.e. post HPAI) and that the Applicant undertook a PVA on the overly precautionary collision plus displacement in-combination total of 219 adult gannet mortalities (overly precautionary as included connectivity in the breeding season with the projects in the Liverpool Bay/NE Irish Sea when tracking data suggest there isn't any, no consideration of macro avoidance, overly precautionary displacement rate of 10% for displacement impacts – see Section 2.7 of AS-012 for details). This PVA suggested that the colony population could continue to grow from its current size (indicated by a growth rate of >1.00 – see 'Upper PVA summary' tab of AS-013), even with this overly precautionary impact. Therefore, we consider that our previous advice at Morgan regarding Grassholm SPA gannet that an AEoSI can be ruled out remains (as set out in Section 2.7 of AS012).

### **With Regards to Marine Mammals**

REP6-032 Env Statement - Vol2 Chapter 4 Marine mammals, REP6-048 Morgan Offshore Wind Limited S\_D6\_31 Outline Marine Mammal Mitigation protocol, REP6-046 Morgan Offshore Wind Limited S\_D6\_30.1 Underwater Sound Management Strategy

NRW(A) confirm that in respect to marine mammals, the updated information provided at Deadline 6 does not alter our agreement to the conclusions of the HRA, and that point 15 of our response at Deadline 6 [REP6-101] is resolved as the anticipated amendment is reflected in the updated documents

REP6-046 Morgan Offshore Wind Limited S\_D6\_30.1 Underwater Sound Management Strategy

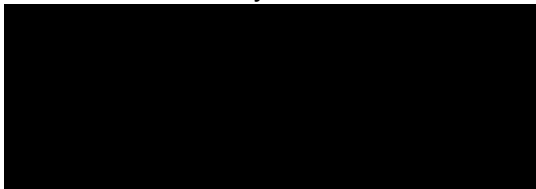
NRW(A) maintain our position in point 16 of [REP6-101] that the UWSMS, MMMP and general approach to mitigation, not just the final MMMP, be development in consultation and agreement with all the SNCBs, and then agreed with the MMO as appropriate, following the indicated approach on page 4 of the MMMP *"a Final MMMP will be*

*developed post-consent, in consultation with the licencing authority and Statutory Nature Conservation Bodies (SNCBs), in consideration of any refinements to the Morgan Generation Assets design”.*

We note that new conservation advice packages and condition assessments have recently been produced for Welsh SACs, including for Pen Llŷn a'r Sarnau SAC and Bae Ceredigion Cardigan Bay SAC (note new packages have not been produced for cross border sites such as Gogledd Môn Forol / North Anglesey Marine SAC). Of particular relevance is the revised Objective 2 for bottlenose dolphin features. While these new advice packages may require an amendment to the HRA, the packages do not result in a change of our previous advice that an AEoSI can be ruled out

Please do not hesitate to contact [REDACTED] [\[REDACTED\]@cyfoethnaturiolcymru.gov.uk](mailto:[REDACTED]@cyfoethnaturiolcymru.gov.uk) and [REDACTED] [\[REDACTED\]@cyfoethnaturiolcymru.gov.uk](mailto:[REDACTED]@cyfoethnaturiolcymru.gov.uk) should you require further advice or information regarding the above.

Yours sincerely

A large black rectangular box redacting the signature of the Marine Services Manager.

Marine Services Manager  
Natural Resources Wales