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PINS Reference: EN010136  
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To whom it may concern,

## **Morgan Offshore Wind Project: Generation Assets – EN010136 – Response to the Secretary of State’s Request for Further Information**

Thank you for consulting JNCC on the Morgan Offshore Wind Project, Secretary of State’s request for further information, dated 19 June 2025.

The advice contained within this minute is provided by JNCC as part of our statutory advisory role to the UK Government and devolved administrations on issues relating to nature conservation in UK offshore waters (beyond the territorial limit).

In response to the Secretary of State’s request for further information, please see comments below regarding point 13 – Updates in respect of Habitats Regulation Assessment (“HRA”) matters:

- 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.

### **JNCC Comments**

In answering this query we have reviewed [REP6-057](#), [REP6-059](#), and [REP6-066](#).

### **Skomer, Skokholm and the Seas off Pembrokeshire/Sgomer, Sgogwm a Moroedd Penfro Special Protected Area (SPA)**

The applicant previously provided assessments produced in line with JNCC advice ([REP5-034](#)). We agreed with the parameterisation of this assessment, and we concluded no

Adverse Effect on Integrity (AEol) on Skomer, Skokholm and the Seas off Pembrokeshire/Sgomer, Sgogwm a Moroedd Penfro SPA, as documented in JNCC response [REP5-067](#).

We previously advised ([REP5-067](#)) that mortality estimates which are updated throughout the examination should be included within revised HRA and Environmental Impact Assessment (EIA) documentation in order for final versions to be publicly available and easily accessible for future cumulative and in-combination assessments. However, the final Appropriate Assessment ([REP6-066](#)) solely provides the Applicant's preferred parameters, and has not been updated to include Statutory Nature Conservation Body (SNCB)-advised assessments.

We note that the Applicant has provided additional information to go alongside the SNCB's preferred approach, which describes in-combination assessments and Population Viability Analyses (PVA) ([REP6-057](#)). However, the latest version of the HRA ([REP6-066](#)) states that no in-combination assessment was required and no PVAs have been carried out, due to it being the Applicant's preferred approach. Hence there is a mismatch between [REP6-057](#) and [REP6-066](#). This again highlights the need to provide assessments including both the Applicant's preferred approach and the SNCB's advised approach, should they be different, to aid clarity and to avoid confusion.

We recommend that the SNCB's advised assessments are considered when coming to conclusions regarding AEol, as this approach provides a plausible range of potential impacts, including a realistic worst-case scenario.

We remain of the opinion, based on the assessment within [REP5-034](#), that there is no AEol on Skomer, Skokholm and the Seas off Pembrokeshire/Sgomer, Sgogwm a Moroedd Penfro SPA.

### **Other relevant SPAs within JNCC's jurisdiction**

We have also previously commented ([REP5-060](#)) on other relevant SPAs within JNCC's jurisdiction:

- Irish Sea Front SPA
- Seas off St Kilda SPA
- Liverpool Bay/Bae Lerpwl SPA

JNCC agreed with the conclusions of the HRA that an AEol can be ruled out, both from the Project alone, and in-combination with other Plans and Projects for Irish Sea Front SPA, Seas off St Kilda SPA, and Liverpool Bay/Bae Lerpwl SPA. Nothing has changed in respect of the assessment nor conclusions of the assessments on these SPAs; therefore we continue to agree that an AEol can be ruled out.

### **Summary**

We remain of the opinion, based on the assessment within [REP5-034](#) that there is no AEol alone or in-combination on Skomer, Skokholm and the Seas off Pembrokeshire/Sgomer, Sgogwm a Moroedd Penfro SPA.

We remain of the opinion, based on the assessment within [REP6-066](#) that there is no AEol alone or in-combination on the Irish Sea Front SPA, Seas off St Kilda SPA, and Liverpool Bay/Bae Lerpwl SPA.

Please contact me with any questions regarding the above comments.

Yours sincerely,

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