

Date: 19 May 2025
Our ref: 511260 Natural England's Covering Letter to Deadline 1
Morgan and Morecambe OWF Transmission Assets Project
Your ref: EN020028



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BY EMAIL ONLY

Dear David Cliff,

Morgan and Morecambe Offshore Wind Project: Transmission Assets

The following constitutes Natural England's formal statutory response for Examination Deadline 1.

1. Deadline 1 Submissions

As stated in our Rule 6 response of 11 April 2025, in the interests of early resolution of issues, Natural England combined our Relevant Representation and Written Representations which were submitted on 27 January 2025 [RR-1601]. In addition, we submitted further advice on onshore protected species which were submitted prior to the start of Examination on 21 March 2025 [AS-066].

Natural England have submitted the following documents at Deadline 1:

- EN020028 – 511260 Morgan and Morecambe Offshore Wind Project: Transmission - Appendix K1 - Natural England's Risk and Issues Log Deadline 1

2. Risk and Issues Log and Engagement through Examination

Natural England has submitted a Risk and Issues Log, which aims to track progress on the issues raised in our relevant/written representations. It is anticipated that the Risk and Issues Log will be updated and submitted alongside our submissions during examination at each deadline to reflect any progress in issue resolution during examination.

Natural England wishes to highlight that the focus of our engagement during Examination will be on reviewing relevant updated documents/outline plans submitted by the Applicant. We are unlikely to respond directly to commentary on our representations (including on the Risk and Issues Log) from the Applicant or Interested Parties, unless there is significant new material included, a misinterpretation of Natural England's position, or if the Examining Authority (ExA) questions direct us to do so. The Risk and Issues Log will be used to track issue progress and we will signpost to our advice where applicable. Likewise, if the Applicant wishes to provide a signposting document that directs us and the ExA to where they address our concerns with tracked changes in the various plans/documents/assessments then that would be welcomed.

Once a risk or issue has been categorised as yellow or green, Natural England will not make further comment on the matter at subsequent deadlines, unless specifically requested to through ExA Questions. These rows will then be greyed out at subsequent deadlines in order to rationalise the Risk and Issues Log.

Please note that due to resource constraints, unless there is a significant change to the project design or changes in the Applicant's position in relation to the points raised here and within our Relevant Representations, Natural England will no longer be providing full marine mammal advice or updating the Risk and Issues log for marine mammals for this Examination.

3. Statements of Common Ground (SoCG), Statement of Commonality for SoCG, Principal Areas of Disagreement Summary Statements (PADSS) and other progress tracking documents

As per the Rule 6 letter, Natural England have submitted our Principal Areas of Disagreement Summary Statement (PADSS) in place of a SoCG at Deadline 1. These are provided in the 'PADSS' tab of our submitted R&I Log (Appendix K1). We hope this will be of assistance to the ExA in understanding Natural England's current outstanding issues and demonstrating progress on issue resolution. We also hope that this will assist the Applicant in updating their SoCGs and Statement of Commonality of SoCGs at the relevant stages.

In our Rule 6 response letter, Natural England advised that we will not engage in the production of a SoCG at Deadlines 1,3 and 4, in favour of issue resolution. Therefore, we will provide an updated PADSS as a tab of the Risk and Issues log at these Deadlines unless the ExA advise otherwise. Natural England has recommended that the Applicant develops and maintains a draft SoCG based on our R&I log and PADSS, which Natural England will engage with at the final SoCG deadline as requested by the ExA.

4. Documents submitted at the Pre-Examination Procedural Deadline

We note that the Applicant has submitted documents prior to the Pre-Examination Procedural Deadline, including responses to our RR/WRs. We reiterate our comment in Section 2 of this cover letter in that we are unlikely to respond directly to commentary on our representations, unless in exceptional circumstances. However, we highlight as an overarching comment that several of the RAG ratings within the Applicants responses to our RR/WRs differ from Natural England's own RAG ratings provided within our RR/WRs [PDA-014 – PDA-024]. These are

therefore not reflective of Natural England's assessment of risk as indicated in our RAG ratings, for which our R&I Log and PADSS must be consulted.

5. Assessment of Construction Scenarios

We note the Applicant's submission [AS-070] detailing the assessment of the various construction scenarios which could occur. However, we maintain our original comments as outlined in our RR/WRs [RR-1601]. In particular, we highlight the following points from our RR/WR:

- A four-year gap may allow for some recovery of seabed habitats and species from the first works. The Applicant has not considered the potential for recovery and the impact from repeated interventions within the Environmental Statement (ES);
- The baseline data used to inform impact assessments could become outdated and impacts not accurately assessed; and,
- The sequential scenario could result in a cumulative impact over a longer duration, this has not been considered in the cumulative assessment.

We therefore continue to advise that these aspects have not been fully considered in the ES. Natural England's main concerns are in relation to the benthic and subtidal ecology receptors with a particular focus on the recovery of seabed habitats and species during the maximum gap of up to four years between the projects.

6. Issue Specific Hearing 1 Agenda Item 6

Natural England highlights that since the submission of our RR/WRs in January, we have been working closely with the Applicants and provided discretionary advice in relation to onshore and offshore ornithology and the potential impacts to the Ribble and Alt Estuary SPA and Liverpool Bay SPA.

Natural England and the Applicants also undertook a productive site visit on 28 April to discuss potential ornithological impacts associated with the Ribble and Alt Estuary SPA and Liverpool Bay SPA. Following the site visit and a meeting to further discuss ornithological issues with the Applicants, Natural England provided written advice to the Applicants on mitigation and how to resolve our concerns. Updates on each of the SPAs are provided below:

Ribble and Alt Estuary SPA: Natural England advises that our key outstanding concerns relate to potential impacts at the landfall and potential impacts along the onshore cable route. It is our understanding that the Applicants intend on submitting further information on the key issues in relation to impacts at these locations on the Ribble and Alt Estuary SPA. The following outstanding information is required to address our concerns:

Landfall - options to reduce impacts at the working areas, detailed plans on the mitigation areas, clarification of worst-case scenario at the landfall and further information on the construction impacts to energetic costs.

Onshore cable route – further information relating to the River Ribble Crossing, updated noise modelling information regarding the proposed construction access to the north of Newton Marsh SSSI and updated plans for the ornithological mitigation areas at Lytham Moss and Newton with Scales.

We are confident that these updates could go some way in addressing our concerns, however we are unable to provide a conclusion on the status of Adverse Effect on Integrity (AEoI) on the Ribble and Alt Estuary SPA until we have reviewed the detail provided within these documents. We therefore defer comment on the impacts to Ribble and Alt Estuary SPA until the Applicants have provided and submitted further information.

Liverpool Bay SPA: It is our understanding that the Applicants will be submitting updates at Deadline 2 to include further mitigation. The Applicants have shared the draft wording with Natural England over email on 14 May 2025 and we are encouraged by the efforts of the Applicant to address our concerns, though some details need to be agreed. We will provide further updates to the ExA once the Applicants have submitted this into Examination.

Yours sincerely,

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Cheshire to Lancashire Area Team

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Annex 1: Natural England's Response to the Applicant's Documents Submitted at the Pre-Exam Procedural Deadline A

PINS Document Reference	Document Name	Natural England's Response/Position Summary
Pre-Exam Procedural Deadline – 11 April 2025		
PDA-001	Procedural Deadline A Submission - Cover Letter	Natural England has no comments to make on this document.
PDA-002	Procedural deadline A Submission - Application Guide (Clean)	Natural England has no comments to make on this document.
PDA-003	Procedural deadline A Submission - Application Guide (Tracked)	Natural England has no comments to make on this document.
PDA-004	Procedural deadline A Submission - The Applicants' response to the Examining Authority's Rule 6 letter	Natural England has no comments to make on this document.
PDA-005	Procedural deadline A Submission - 3.1 The Applicants' Response to Relevant Representations Part 1 - Introduction and thematic responses	Natural England has no comments to make on this document.
PDA-014	Procedural deadline A Submission - Annex 3.2.7 to Response to RR - Natural England (RR-1601)	NE notes the document submitted at the pre-examination procedural Deadline A and comments made within. We have reviewed this document; however, it has not addressed our written concerns.
PDA-015	Procedural deadline A Submission - Annex 3.2.8 to Response to RR - Natural England (RR-1601) - Appendix A (DCO)	As per above point to PDA-014
PDA-016	Procedural deadline A Submission - Annex 3.2.9 to Response to RR - Natural England (RR-1601) - Appendix B (Physical processes)	As per above point to PDA-014
PDA-017	Procedural deadline A Submission - Annex 3.2.10 to Response to RR - Natural England (RR-1601) - Appendix C (Benthic subtidal and intertidal ecology)	As per above point to PDA-014
PDA-018	Procedural deadline A Submission - Annex 3.2.11 to Response to RR - Natural England (RR-1601) - Appendix D (Fish and Shellfish)	As per above point to PDA-014
PDA-019	Procedural deadline A Submission - Annex 3.2.12 to Response to RR - Natural England (RR-1601) - Appendix E (Marine Mammals)	As per above point to PDA-014

PDA-020	Procedural deadline A Submission - Annex 3.2.13 to Response to RR - Natural England (RR-1601) - Appendix F (Offshore Ornithology)	As per above point to PDA-014
PDA-021	Procedural deadline A Submission - Annex 3.2.14 to Response to RR - Natural England (RR-1601) - Appendix G (Onshore Ecology and Nature Conservation)	As per above point to PDA-014
PDA-022	Procedural deadline A Submission - Annex 3.2.15 to Response to RR - Natural England (AS-066) - Appendix G1 - Onshore ecology and nature conservation - Additional Submission	As per above point to PDA-014
PDA-023	Procedural deadline A Submission - Annex 3.2.16 to Response to RR - Natural England (RR-1601) - Appendix H (Onshore and Intertidal Ornithology)	As per above point to PDA-014
PDA-024	Procedural deadline A Submission - Annex 3.2.17 to Response to RR - Natural England (RR-1601) - Appendix I (Fylde MCZ)	As per above point to PDA-014
PDA-032	Procedural deadline A Submission - Glossary and Acronyms list for Applicants' response to Relevant Representations	Natural England has no comments to make on this document.