Date: 07 July 2025

Our ref: 514882 Natural England's Covering Letter to Deadline 3 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 3.

#### 1. Deadline 3 Submissions

Natural England have submitted the following documents at Deadline 3:

- EN020028 514882 Morgan and Morecambe Offshore Wind Transmission Assets -Appendix K3 - Natural England's Risk and Issues Log Deadline 3;
- EN020028 514882 Morgan and Morecambe Offshore Wind Transmission Assets -Appendix L3 - Natural England's comments on Examining Authority's written questions (ExQ1) [PD-008];
- EN020028 514882 Morgan and Morecambe Offshore Wind Transmission Assets -Appendix C3 – Natural England's comments on Benthic and Subtidal Ecology Deadline 3; and
- EN020028 514882 Morgan and Morecambe Offshore Wind Transmission Assets Appendix G3 – Natural England's comments on Onshore Ecology and Nature Conservation Deadline 3

### 2. Submission of Updated Environmental Statement Chapters

In REP2-001 the Applicant outlined the following approach to finalising chapters: 'Prior to the end of examination and once the Commitment Register is finalised, any necessary updates will be made to the relevant Environmental Statement chapters, likely at Deadline 6'.

Natural England would like to raise that should all chapters only be updated at Deadline 6 (22<sup>nd</sup> October), this would only allow a week before Deadline 7, and the close of Examination (29<sup>th</sup> October), to review the changes in the chapters and provide a response. In our responses in the Risk and Issues Log we highlight issues we think can be readily resolved by updating certain chapters now. We would therefore encourage the Applicant to submit updated versions of those chapters before Deadline 6, to allow adequate time to review changes and prevent all updated chapters being submitted at the same deadline.

## 3. Updates to the Risk and Issues Log at Deadline 3

At Deadline 2 the Applicant submitted multiple documents requiring Natural England's review. Annex 1 lists the documents which have been reviewed by Natural England and where comments can be found.

## 4. Onshore Ornithology Advice

Natural England acknowledges the documents submitted into Examination regarding onshore ornithology issues. We would like to highlight that these issues have been explored through our Discretionary Advice Service and discussed on a site visit and teams meeting. We have included some initial comments on resolved matters in response to the submitted documents in the relevant Examiner's Questions and captured these in the Risk and Issues Log where appropriate.

Due to unforeseen circumstances, unfortunately we are not able to provide advice on all the onshore ornithology information submitted by the Applicant at Deadline 2. Our outstanding concerns relate to the impacts on passage waterbirds at the landfall and the proposed management at Fairhaven saltmarsh, and the measures proposed to address the loss of Functionally Linked Land affected by the onshore cable route. We are working to progress this advice and will submit it as soon as possible after Deadline 3, in the hope that this will be accepted into the Examination at the Examiner's discretion. We will also provide the advice directly to the Applicant to help progress these issues.

#### 5. Onshore Ecology and Nature Conservation

Natural England has provided comments and updates on Onshore Ecology and Nature Conservation issues in the Risk and Issues Log submitted at Deadline 3 (Appendix K3). In Appendix G3 we provide additional clarification and reiterate our advice on the outstanding issues in the Risk and Issues Log, however we wish to highlight that our advice in our Relevant Representations [RR-1601] on these matters has not changed.

# Yours sincerely,

Cheshire to Lancashire Area Team

E-mail: @naturalengland.org.uk / @naturalengland.org.uk

Annex 1: Natural England's Response to the Applicant's Documents Submitted at Deadline 2

PINS Document Reference	Document Name	Natural England's Response/Position Summary		
Deadline 2 – 05 June 2025				
REP2-005	C1_MMTA_Draft Development Consent Order_F03_F04_Tracked.pdf	Natural England's advice on the Applicant's updated DCO and updates is included in tab A – DCO of the R&I Log submitted at D3.		
REP2-004	C1_MMTA_Draft Development Consent Order_F04.pdf	Natural England's advice on the Applicant's updated DCO and updates is included in tab A – DCO of the R&I Log submitted at D3.		
REP2-009	F1.3_MMTA_Project Description_F02_F03_tracked.pdf	Natural England has no comments to make on this document.		
REP2-008	F1.3_MMTA_Project Description_F03 clean.pdf	Natural England has no comments to make on this document.		
REP2-010	F1.5.3_MMTA_ES_Commitments Register ES01_F03_Clean.pdf	Natural England has no comments to make on this document.		
REP2-011	F1.5.3_MMTA_ES_Commitments Register ES01_F03_Tracked.pdf	Natural England has no comments to make on this document.		
REP2-013	F2.10_MMTA_ES Volume 2, Figures, Part 3 of 5_F01_F02_Tracked.pdf	Natural England has no comments to make on this document.		
REP2-012	F2.10_MMTA_ES Volume 2, Figures, Part 3 of 5_F02.pdf	Natural England has no comments to make on this document.		
REP2-015	F3.3.3_MMTA_Habitat, National Vegetation Classification and Hedgerow_F01_F02_Tracked	Natural England's advice in relation to this document is included in section 5 of this cover letter and in relevant comments in tab G of the Risk and Issues Log submitted at D3.		
REP2-014	F3.3.3_MMTA_Habitat, National Vegetation Classification and Hedgerow_F02	Natural England's advice in relation to this document is included in section 5 of this cover letter and in relevant comments in tab G of the Risk and Issues Log submitted at D3.		

	J11 MMTA Onshore Biodiversity Benefit	Natural England has no comments to make on this
REP2-020	Statement_F02_F03_Clean.pdf	document.
	J11_MMTA_Onshore Biodiversity Benefit	Natural England has no comments to make on this
REP2-021	Statement_F02_F03_Tracked.pdf	document.
		Natural England's advice on the Applicant's updated
DED0 000	J15_MMTA Outline Offshore Cable Specification and Installation	CSIP is included in tabs B and C of the R&I Log and in
REP2-023	Plan_FO1_FO2_Tracked	Appendix C3 submitted at D3.
	J15 Outline Offshore Cable Specification and Installation	Natural England's advice on the Applicant's updated CSIP is included in tabs B and C of the R&I Log and in
REP2-022	Plan FO2	Appendix C3 submitted at D3.
TALL E GEE	J16 MMTA Measures to Min Dist to MM and Rafting Birds from	Natural England welcomes the updates to this document
REP2-025	Vessels F01 F02 Tracked	and have no specific comments to raise.
	J16 MMTA Measures to Min Dist to MM and Rafting Birds from	Natural England welcomes the updates to this document
REP2-024	Vessels_F02	and have no specific comments to raise.
		Natural England's advice on the Applicant's updated
DED0 000	J18_MMTA_Outline Marine Mammal Mitigation	outline MMMP is included in tab E of the R&I Log
REP2-026	Protocol_F01_F02_Clean.pdf	submitted at D3.
	119 MMTA Outling Maring Mammal Mitigation	Natural England's advice on the Applicant's updated outline MMMP is included in tab E of the R&I Log
REP2-027	J18_MMTA_Outline Marine Mammal Mitigation Protocol F01 F02 Tracked.pdf	submitted at D3.
TALLE OZI	J5 MMTA Outline Construction Traffic Management	Natural England has no comments to make on this
REP2-017	Plan F01 F02 Tracked.pdf	document.
	J5 MMTA Outline Construction Traffic Management	Natural England has no comments to make on this
REP2-016	Plan_F02.pdf	document.
		Natural England welcomes the updates to this document
		and updates can be found in specific receptor tabs
DED2 040	IG MMTA Outling Englagical Management Plan FOO alses and	referencing this document where appropriate in the R&I
REP2-018	J6_MMTA_Outline Ecological Management Plan F02_clean.pdf	Log submitted at D3.
		Natural England welcomes the updates to this document and updates can be found in specific receptor tabs
		referencing this document where appropriate in the R&I
REP2-019	J6_MMTA_Outline Ecological Management Plan F02_tracked.pdf	Log submitted at D3.
REP2-028	S_D1_14_MMTA_ Errata_F01_F02_clean.pdf	Natural England has no comments to make on this

		document.
REP2-029	S_D1_14_MMTA_ Errata_F01_F02_tracked.pdf	Natural England has no comments to make on this document.
REP2-001	S_D2_1_MMTA_Deadline 2 Cover Letter_F01.pdf	Natural England has responded to this document in section 2 of this cover letter.
REP2-044	S_D2_11_MMTA_ Technical note on Newton Marsh SSSI and River Ribble Crossing _F01	Natural England's advice on this document is included in tab H – Onshore and Intertidal Ornithology of the R&I Log submitted at D3 as well as relevant Examiners Questions.
REP2-045	S_D2_12_MMTA_ Technical note on the energetics of the birds at landfall_F01	As set out in the cover letter, due to unforeseen circumstances our advice on this document is delayed but will be submitted as soon as possible.
REP2-046	S_D2_13_MMTA_ Site Selection of the Environmental Mitigation and Biodiversity Benefit Areas _F01	As set out in the cover letter, due to unforeseen circumstances our advice on this document is delayed but will be submitted as soon as possible.
REP2-043	S_D2_10_MMTA_ Review of CEA and In-Combination Assessment _F01.pdf	Natural England welcomes the updates to this document and updates can be found in tab F – Offshore Ornithology in the R&I Log submitted at D3.
REP2-047	S_D2_14_MMTA_Strategy for Wildlife Hazard Management Plan_F01.pdf	Natural England has no comments to make on this document.
REP2-048	S_D2_15_MMTA_ Commitments Register Schedule of Changes_F01.pdf	Natural England has no comments to make on this document.
REP2-051	S_S51_2_MMTA_ Schedule of Changes dDCO_F03.pdf	Natural England's advice on the Applicant's updated DCO are included in relevant comments in tab A – DCO of the R&I Log submitted at D3.