



THE PLANNING ACT 2008

THE INFRASTRUCTURE PLANNING (EXAMINATION PROCEDURE) RULES
2010

Morgan and Morecambe Offshore Wind Farm: Transmission Assets

Appendix C3 to Natural England's Deadline 3 Submission
Natural England's comments on Benthic and Subtidal Ecology

For:

The construction and operation of the Morgan and Morecambe Transmission Assets
located approximately 0 - 37 km off the Northwest English Coast in the Irish Sea.

Planning Inspectorate Reference EN020028

07 July 2025

1. Major/Complex comments

In formulating these comments, the following documents have been considered:

- [REP2-023] J15_MMTA Outline Offshore Cable Specification and Installation Plan (Tracked) – Rev F02
- [REP2-009] F1.3 Volume 1, Chapter 3: Project description Tracked – Rev F03

1.1. Summary

Detailed comments are provided below on the updated outline CSIP [REP2-023] and Project Description [REP2-009] submitted by the Applicant at Deadline 2. The comments are also reflected in Natural England's Risk & Issues Log (Appendix K3) submitted at Deadline 3.

1.2. Detailed comments

Table 1: Natural England's Advice On: Benthic and Subtidal Ecology – Outline CSIP

Document reviewed: [REP2-023] J15_MMTA Outline Offshore Cable Specification and Installation Plan (Tracked) – Rev F02			
NE Ref	Section	Key Concern and/or Update	Natural England's Advice to Resolve Issue
1	6.3.1.3	Natural England welcomes that the Applicant have committed to the use of low order UXO clearance only (CoT64) and note that if UXO clearance with the use high order techniques is required, the Applicants will apply for this under separate marine licence applications, post-consent.	Natural England reiterate our Relevant Representations [RR-1601] Annex C advice points C14, C22, and C45 which requires the Applicant to quantify and evaluate the worst-case impacts from UXO clearance within and outside the Fylde MCZ. This evaluation should provide evidence to justify the current temporary characterisation of impacts.
2	6.6.1.2	Natural England notes that the Applicant has stated that material arising from sandwave clearance, for example by controlled flow excavation, and cable installation within the Fylde MCZ will naturally disperse within the immediate vicinity of the Transmission Assets Order Limits from which it was displaced ensuring that material remains within the same sediment cell and that material is not lost from the system. Material will not be physically removed from the system but allowed to settle around the seabed from which, it originated.	Natural England welcomes the use of Control Flow Excavator for cable installation to ensure retention of sediment within the local sediment cells, but that would not be the case with the other proposed installation tools for sandwave clearance. Therefore, the mitigation measures should go further to consider Natural England's advice as detailed in RR-1601 Annex C point C31. And R&I Log (Appendix K) points B6, B10, B16, C8, C13, C14, and C15.

Table 2: Natural England's Advice On: Benthic and Subtidal Ecology – Project Description

Document reviewed: [REP2-009] F1.3 Volume 1, Chapter 3: Project description Tracked – Rev F03			
NE Ref	Section	Key Concern and/or Update	Natural England's Advice to Resolve Issue
1	3.12.5.1 and Table 3.5	Natural England notes that the Applicant states that the “trench width on the seabed will be subject to the selected trenching technique used, and the local ground conditions encountered along the offshore cable corridor route”.	Natural England requires assurance that the 20 m width quoted within Table 3.6 is a realistic maximum design scenario for seabed disturbance.
2	3.12.5.2	Natural England notes that the project description has been updated to state that a “burial depth of 1 m, dependent upon the outcome of the detailed CBRAs which will be informed by pre-construction geotechnical surveys.”	Natural England is concerned that in the absence of an appropriately detailed CBRA that the MDS for cable protection, particularly within the Fylde MCZ, may not be realistic. We require further information as to how the MDS for rock protection, specifically within the Fylde MCZ, has been confidently determined.
3	3.12.6.1	Natural England notes that to support the removability of cable protection “rock dump as cable protection for both ground conditions and cable crossings will not be used within the Fylde MCZ.”	Natural England welcomes the removal of the option of 'rock dump' from the list of cable protection types to be used within Fylde MCZ , and agrees with the Applicant that rock dump is the least recoverable type of protection. However, we continue to advise that a commitment to remove all on and above seabed infrastructure (including cable/scour protection) within benthic designated sites is secured in the DCO.
4	Table 3.7	Natural England notes that rock dump is still proposed for use outside of the Fylde MCZ.	Natural England reiterate our advice as detailed in RR-1601 Annex C point C28 and strongly recommend that a commitment is secured in the DCO for the removal of all infrastructure placed upon the seabed at the time of decommissioning both inside and outside of Fylde MCZ.
5	3.15.3.9	Natural England notes that the Applicant states that “trench widths at the surface and base are also subject to specific ground conditions encountered along the route. For instance, free-flowing sand conditions may result in wider trenches at the surface due to the tendency for sand to remain mobile. More rigid soil types such as clay are able to maintain a narrower trench	Natural England strongly disagrees that ‘target’ trench widths should be the same as realistic maximum design scenarios and require assurance that the 20 m width quoted within Table 3.6 is a realistic maximum design scenario. If this is not the case, Natural England advises that the MDS is appropriately updated.

		width at the surface. Therefore, trench widths are defined as “target” within the defined parameters of the design envelope and will be subject to detailed ground investigation.”	
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