

Date: 08 August 2025
Our ref: 518289 Natural England's Covering Letter to Deadline 4
Morgan and Morecambe OWF Transmission Assets Project
Your ref: EN020028



David Cliff
National Infrastructure Planning
The Planning Inspectorate
Temple Quay House
2 The Square
Bristol
BS1 6PN

Hornbeam House
Crewe Business
Park Electra Way
Crewe
Cheshire
CW1 6GJ

T 0300 060 3900

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 4.

1. Deadline 4 Submissions

Natural England have submitted the following documents at Deadline 4:

- EN020028 518289 Morgan and Morecambe Offshore Wind Transmission Assets – Appendix K4 – Natural England's Risk and Issues Log Deadline 4;
- EN020028 518289 Morgan and Morecambe Offshore Wind Transmission Assets – Appendix G4 – Natural England's comments on the Outline Hydrogeological Risk Assessment of Lytham St Annes Dunes SSSI; and
- EN020028 518289 Morgan and Morecambe Offshore Wind Transmission Assets – Appendix J4 – Natural England's comments on the Without Prejudice Benthic Compensation DCO Schedule.

2. Updates to the Risk and Issues Log at Deadline 4

Natural England have reviewed the documents submitted by the Applicant at Deadline 3. Annex 1 lists the documents we have reviewed and for instances where we have not provided advice via an Appendix, where comments can be found in the Risk & Issues Log.

3. Advice through Discretionary Advice Service (DAS)

Natural England draws the ExA attention to the multiple DAS calls we have had with the Applicant to discuss outstanding issues and aid the Applicant in issue resolution. A summary of recent DAS engagement is provided in the relevant topic area headings below and is referenced in the R&I log (Appendix K4) to highlight the relevant issues to the Examiners.

Given this level of non-statutory engagement, we now consider that the onus is on the Applicant to ensure our DAS advice has been reflected and incorporated into their submissions. Across all outstanding areas our headline advice to the Applicant is to fully utilise the detailed advice provided through DAS and submitted at previous deadlines to update the relevant documents and chapters, and to submit these promptly into the Examination. Natural England's preferred approach going forwards is to engage through the formal Examination process.

3.1 Benthic Ecology and Physical Processes

Natural England and the Applicant attended a meeting under DAS on 22 July 2025. During this meeting, the Applicant presented how they intend on resolving Natural England's concerns and what new information they are going to submit into Examination. Natural England provided advice on the information and the detail we require for a route to resolution. We will therefore revisit these topic areas once the Applicant has submitted the relevant information into Examination. Natural England will only review new/updated information/documents/plans submitted into Examination, we will not be engaging in rebuttal-style documents or 'comments on comments'. Therefore, unless new information/assessment/named plans are submitted, our original position in our Relevant Representations will largely remain unchanged.

Additionally, we note the Applicant submitted their Without Prejudice Benthic Compensation DCO Schedule [REP3-066]. Natural England has provided comments on this in Appendix J4.

3.2 Onshore Ecology

Natural England and the Applicant attended a meeting under DAS on 12 June 2025 to discuss the Outline Hydrogeological Risk Assessment of Lytham St Annes Dunes SSSI [REP3-061] which the Applicant submitted at Deadline 3. We have provided detailed comments in Appendix G4 submitted at Deadline 4.

3.3 Intertidal and Onshore Ornithology

Natural England and the Applicant attended a meeting under DAS on 25 July 2025 to discuss onshore ornithology matters, namely: impacts on passage waterbirds at landfall, the proposed management at Fairhaven saltmarsh, and the measures proposed to address the loss of Functionally Linked Land affected by the onshore cable route. Prior to the meeting we provided the Applicant with our late submission at Deadline 3 [AS-078] which provided advice on these matters. Following the meeting we provided further written advice on onshore ornithology. We

advised the Applicant to utilise our advice given throughout Examination and DAS thus far and we will review any additional /updated documents once submitted into Examination.

Yours sincerely,

[REDACTED]

Cheshire to Lancashire Area Team

E-mail: [REDACTED] [\[REDACTED\]@naturalengland.org.uk](mailto:[REDACTED]@naturalengland.org.uk) / [REDACTED] [\[REDACTED\]@naturalengland.org.uk](mailto:[REDACTED]@naturalengland.org.uk)

Annex 1: Natural England's Response to the Applicant's Documents Submitted at Deadline 3

PINS Document Reference	Document Name	Natural England's Response/Position Summary
Deadline 2 – 05 June 2025		
REP3-001	S_D3_1_MMTA_Deadline 3 Cover Letter_F01.pdf	Natural England has no comments to make on this document.
REP3-010	C1_MMTA_Draft Development Consent Order_F04_F05_Tracked.pdf	Natural England's advice on the Applicant's updated DCO is included in tab A – DCO of the R&I Log submitted at D4.
REP3-014	F1.5.3_MMTA_CommitmentsRegister_F03_F04_Tracked.pdf	Natural England has no comments to make on this document.
REP3-017	F3.5.6_MMTA_ES_Interim trial trenching report F01.pdf	Natural England's advice relating to this document is included in tab G – Onshore Ecology of the R&I Log submitted at D4.
REP3-033	J20_MMTA_Offshore In Principle Monitoring Plan_F01_F02_Tracked.pdf	Natural England has no comments to make on this document.
REP3-022	J6_MMTA_Outline Ecological Management Plan F03.pdf	Natural England has no comments to make on this document.
REP3-038	S_D1_14_MMTA_Errata_F02_F03_Tracked.pdf	Natural England has no comments to make on this document.
REP3-055	S_D3_2.3_MMTA_Annex 2.3 to Applicants response to IP submissions_Natural England_F01.pdf	Natural England has no comments to make on this document.
REP3-056	S_D3_3_MMTA_Applicants response to ExQ1_F01.pdf	Natural England has no comments to make on this document.
REP3-060	S_D3_5_MMTA_Baseline Bird Technical Report_F01.pdf	Natural England has no comments to make on this document.
REP3-061	S_D3_6_MMTA_Outline Hydrogeological Risk Assessment for Lytham St Anne's Sand Dunes_F01.pdf	Natural England's advice on this document is included in Appendix G4 and in tab G – Onshore Ecology of the R&I Log submitted at D4.
REP3-065	S_D3_8_MMTA_Appendix E to the oEMP_Outline Wildlife Hazard Management Plan_F01.pdf	Natural England has no comments to make on this document.
REP3-066	S_D3_9_Without prejudice benthic compensation DCO schedule_F01.pdf	Natural England's advice on this document is included in Appendix J4 and where relevant the R&I Log submitted at D4.
REP3-068	S_D3_11_MMTA_Construction Noise and Vibration Clarification Note_F01.pdf	Natural England has no comments to make on this document.
REP3-071	S_S51_2_MMTA_Schedule of Changes dDCO_F04.pdf	Natural England has no comments to make on this document.