

Date: 22 September 2025  
Our ref: 522936 Natural England's Covering Letter to Deadline 5  
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 5.

**1. Deadline 5 Submissions**

Natural England has submitted the following documents at Deadline 5:

- EN020028 522936 Morgan and Morecambe Offshore Wind Transmission Assets - Appendix B5 - Natural England's Comments on Physical Processes and Benthic and Subtidal Ecology;
- EN020028 522936 Morgan and Morecambe Offshore Wind Transmission Assets - Appendix G5.1 - Natural England's Comments on Onshore Ecology – Soils;
- EN020028 522936 Morgan and Morecambe Offshore Wind Transmission Assets - Appendix G5.2 - Natural England's Comments on Onshore Ecology;
- EN020028 522936 Morgan and Morecambe Offshore Wind Transmission Assets - Appendix G5.3 - Natural England's Comments on Outline Landfall Construction Method Statement;
- EN020028 522936 Morgan and Morecambe Offshore Wind Transmission Assets – Appendix H5 - Natural England's Comments on Onshore and Intertidal Ornithology;
- EN020028 522936 Morgan and Morecambe Offshore Wind Transmission Assets - Appendix K5 - Natural England's Risk and Issues Log Deadline 5; and
- EN020028 522936 Morgan and Morecambe Offshore Wind Transmission Assets – Appendix L5 - Natural England's Response to ExQ2 Deadline 5.

## **2. Engagement through Examination**

As stated at previous deadlines Natural England highlights 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) or rebuttal style documents 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 continues to be used to track issue progress and when applicable we will signpost to our advice.

## **3. Natural England's advice on Stage 2 MCZ assessment and Without Prejudice Measure of Equivalent Environmental Benefit (MEEB) for Fylde Marine Conservation Zone (MCZ)**

It is noted that there are several ExA written questions in [PD-011] regarding Natural England's position on the Stage 2 MCZ assessment and Measures of Equivalent Environmental Benefit (MEEB). To aid clarity, we highlight to the Examiner that Natural England's position regarding the need for a Stage 2 MCZ Assessment and MEEB remains unchanged. Please also see our advice set out in [REP2-062] and updated R&I Log at Deadline 5 and Appendix L5, Q2:7.2.5.

## **4. Updates to the Risk and Issues Log at Deadline 5**

Natural England has reviewed the documents submitted by the Applicant at Deadline 4. 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.

## **5. Joint statement between Natural England and the Applicant on ornithological matters at the landfall relating to the Ribble and Alt Estuary SPA/Ramsar**

Natural England and the Applicant have drafted a joint statement to provide clarity on ornithological matters at the landfall relating to the Ribble and Alt Estuary SPA/Ramsar and to aid the Examining Authority's Written Questions [PD-011]. The following statement also relates to ExA Q2:6.1.1, Q2:9.1.2:

*The Applicants and Natural England can confirm that the parties met on 16 September to discuss the potential impacts on the passage features of the Ribble and Alt Estuaries SPA/Ramsar site. Following on from the meeting, the Applicants and Natural England have agreed that subject to the Applicants submitting further information into Examination at Deadline 5, which were discussed during the meeting and over email, Adverse Effect on Integrity on the Ribble and Alt Estuaries SPA and Ramsar sites can be ruled out, due to the adoption of mitigation measures at the landfall location for the passage periods. The mitigation measures included for the passage period include screening around the compounds on Lytham St Annes beach and employment of an Ecological Clerks of Work who will be on site during landfall construction operations. It is agreed that the Fairhaven Saltmarsh scheme is an alleviation measure which aims to address the residual impacts from the development and reduce existing pressures on ornithological features of the SPA and Ramsar sites, including*

*those species which may be affected by the works in the intertidal.*

## **6. Examining Authority's Rule 13 Notification of Hearings**

We note the Examining Authority's Rule 13 notice of issue-specific and compulsory acquisition hearings for environmental matters on Tuesday 7 October and Wednesday 8 October. We are aware that the Applicant will be providing updates to their documents at Deadline 5 and this may inform the scope of the environmental Issue Specific Hearings. However, due to the considerable number of updates to the Applicant's application documents anticipated to be submitted at Deadline 5, the large number of documents to review between Deadline 5 and 6, publication of the REIS, and formulating Statements of Common Ground, Natural England will not be able to provide our position or advice to inform the ISH. However, we can provide written responses to any questions that may arise during the hearing at Deadline 6.

Yours sincerely,

[REDACTED]

Cheshire to Lancashire Area Team

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# Annex 1: Natural England's Response to the Applicant's Documents Submitted at Deadline 4

PINS Document Reference	Document Name	Natural England's Response/Position Summary
<b>Deadline 4 – 08 August 2025</b>		
REP4-001	S_D4_1_MMTA_Deadline 4 Cover Letter.pdf	Natural England has no comments to make on this document.
REP4-008	C1_MMTA_Draft Development Consent Order_F05_F06_Tracked	Natural England has no comments to make on this document.
REP4-125	S_S51_2_MMTA_Schedule of Changes dDCO_F05	Natural England has no comments to make on this document.
REP4-019	F1.5.3_MMTA_ES_Commitments Register_F04_F05_tracked	Natural England has no comments to make on this document.
REP4-041	J1.7_MMTA_Outline Soil Management Plan_F01_F02_Tracked	Natural England advice on this document is included in Appendix G5.1.
REP4-051	J1.12_MMTA_Outline Biosecurity Protocol_F01_F02_Tracked	Natural England has no comments to make on this document.
REP4-027	J1_MMTA_Outline Code of Construction Practice_F02_F03_Tracked	Natural England advice on this document is included in Appendix G5.2.
REP4-059	J6_MMTA_Outline Ecological Management Plan_F03_F04_Tracked	Natural England's advice on this document is included in Appendix G5.2 and H5 and the relevant topic areas of the R&I Log – onshore ornithology and onshore ecology.
REP4-067	J11_MMTA_Onshore Biodiversity Benefit Statement_F04_tracked	Natural England has no comments to make on this document.
REP4-071	J18_MMTA_Outline Marine Mammal Mitigation Protocol_F02_F03_Tracked.	Natural England has no comments to make on this document.
REP4-073	J19_MMTA_Outline Offshore Operations and Maintenance Plan_F02_Tracked.	Natural England advice on this document is included in Appendix B5.
REP4-075	J20_MMTA_Offshore In Principle Monitoring Plan_F03_Tracked.	Natural England advice on this document is included in Appendix B5.
REP4-088	S_D2_15_MMTA_Commitments Register Schedule of Changes_F03.	Natural England advice on this document is included in Appendices and R&I Log where relevant.

REP4-100	S_D4_2.6_MMTA_Annex 2.6 to Applicants' Response to Natural England (REP3-90 - REP3-95, AS-078) F01.	Natural England has no comments to make on this document.
REP4-109	S_D4_9.1_MMTA_Annex 9.1 to Applicants response to Hearing Action Point ISH2 12_F01.	Natural England has no comments to make on this document.
REP4-115	S_D4_11_MMTA_Outline Onshore Construction Method Statement_F01.	Natural England has no comments to make on this document.
REP4-117	S_D4_14_MMTA_Sand Lizard Mitigation Plan_F01.	Natural England's advice is included in Appendix G5.2 and tab G – Onshore Ecology and Nature Conservation of the R&I Log.
REP4-118	S_D4_15_MMTA_Peat Technical Note_F01_Clean.	Natural England's advice is included in Appendix G5.2 and tab G – Onshore Ecology and Nature Conservation of the R&I Log.
REP4-120	S_D4_17_MMTA_Onshore Terrestrial Waterbird Note_F01.	Natural England's advice is included in Appendix H5 and tab H – Onshore Ornithology if the R&I Log.
REP4-121	S_D4_18 Passage Period at Landfall Technical Note_F01.	Natural England's advice is included in Appendix H5 and tab H – Onshore Ornithology if the R&I Log.
REP4-122	S_D4_19_MMTA_Annex to Applicants response to MMO and NE submission at Deadline_F01.	Natural England has no comments to make on this document.
AS-081	S_D4_22 Outline Landfall Construction Method Statement	Natural England's advice is included in Appendix B5 and Appendix G5.3 and where relevant in the R&I Log.