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(Email only)

MMO Reference: DCO/2022/00010
Planning Inspectorate Reference: EN020028
Identification Number: 20051136

22 October 2025

Dear Mr Cliff,

Planning Act 2008, Morgan Offshore Wind Ltd, Proposed Morgan and Morecambe Offshore Windfarm Transmission Assets Order

Deadline 6 Summary

On 12 December 2024, the Marine Management Organisation (the MMO) received notice under section 55 of the Planning Act 2008 (the PA 2008) that the Planning Inspectorate (PINS) had accepted an application made by Morgan Offshore Wind Limited and Morecambe Offshore Windfarm Limited (the Applicants) for determination of a development consent order for the construction, maintenance and operation of the proposed Morgan and Morecambe Offshore Windfarm Transmission Assets Order (the DCO Application) (MMO ref: DCO/2022/00010; PINS ref: EN020028).

The Applicants seeks authorisation for the construction, operation and maintenance of Morgan and Morecambe Offshore Windfarm Transmission Assets, comprising of two onshore substations, 6 offshore export cables, 18 onshore export cables (6 circuits), 12 400 kilovolt (kV) grid connection cables (4 circuits) as well as the associated cables corridors with associated onshore and offshore infrastructure and all associated development (the Project).

This written representation is submitted without prejudice to any future representation the MMO may make about the DCO Application throughout the examination process. This representation is also submitted without prejudice to any decision the MMO may make on any associated application for consent, permission, approval or any other type of authorisation submitted to the MMO either for the works in the marine area or for any other authorisation relevant to the proposed development.

Yours Sincerely



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1. MMO's Response to Applicants Response to Deadline 4 submission (REP5-123)

1.1 The MMO has reviewed the Applicants response and provided comments on the following sections:

- MMO's Response to the Applicants' Pre-Examination Procedural Deadline A Submission to the MMO (Table 2.3)
- MMO's Comments on Stage 2 MCZ Assessment - Rev F01 Annex A: Review of potential measures of equivalent environmental benefit (MEEB) (Table 2.4, Section 3)
- MMO's Comments on Issue Specific Hearing (ISH) 2 (Table 2.4, Section 9)

2. Underwater Noise Guidance and Effective Deterrence Ranges (EDR)

2.1 Noise Recommendations for Cetaceans

2.1.1 The MMO would like to make the Applicants aware of a new report published by Whale and Dolphin Conservation in collaboration with SAMS Enterprise: A review of anthropogenic noise and recommendations for reducing its impacts on cetaceans (WDC, 2025).

2.2 EDRs – updated advice

2.2.1 The MMO wishes to highlight that the Joint Nature Conservation Committee have updated EDRs for assessing the significance of noise disturbance in harbour porpoise Special Areas of Conservation (SACs).

2.2.2 The MMO wishes to highlight these specific topics that may be of interest to the Applicants:

- High-order UXO clearance (≤ 263 kg) without bubble curtain
- High-order UXO clearance (≤ 525 kg) with bubble curtain
- ADDs

3. Statement of Common Ground (SoCG)

3.1 General Comments

3.1.1 The MMO had a meeting with the Applicants on 13 October 2025 and 20 October 2025, and notes that the following topics will remain 'Not Agreed':

- DCO – UXO Clearance
- DCO - Article 6 – Benefit of the Order
- DCO - Force Majeure
- DCO – Post Construction Monitoring – Adaptive Management
- DML – Cable/Scour Protection (not agreed but not material)



4. MMO's comments on updated Environmental Statement Chapters

4.1 Physical Processes (REP5-030)

- 4.1.1 The MMO notes the potential requirement for cable protection in the nearshore/shallow waters. It notes that standard practice has been to limit protection to 5% of the water depth at a given location; the ES indicates that any protection used in very shallow water should be tapered to ensure limited impact on sediment processes. It is stated that it is unlikely that burial will not be achieved and the magnitude of any potential impact is assessed as low adverse. The MMO is satisfied that this is the case, but the Applicants should take every step to ensure that burial in the nearshore is achievable.
- 4.1.2 The MMO notes that measures to ensure burial in the intertidal and nearshore have been addressed. The MMO is satisfied that the assessment of impacts of these shoreline works is adequate.
- 4.1.3 The MMO notes that the amendments have largely addressed the concerns with the assessment of impacts at landfall and in the nearshore. The MMO does not believe there are any further concerns raised in previous advice for the attention of the Applicants that are not addressed.

4.2 Marine Mammals (REP5-032)

- 4.2.1 The MMO defers to the relevant Statutory Nature Conservation Bodies (SNCBs) to provide comments on the amendments.

4.3 Benthic subtidal and intertidal ecology (REP5-034)

- 4.3.1 The MMO is satisfied with the amendments made to this document.
- 4.3.2 The MMO defers to the SNCBs regarding the potential impacts to protected features within the Fylde MCZ.

4.4 Offshore Ornithology (REP5-036)

- 4.4.1 The MMO notes the amendments made throughout the document and the MMO welcomes these clarifications and commitments.

5. MMO's comments on the updated Cable Specification and Installation Plan (REP5-077)

5.1 General Comments

- 5.1.1 The MMO is satisfied with the amendments made at Deadline 5.
- 5.1.2 The MMO has provided additional comments on the following topics:
- Physical Processes
 - Fisheries and Fish Biology
 - Underwater Noise



6. MMO's comments on the Proposed Correction to Cable Protection Volume

6.1 General Comments

6.1.1 The MMO received an email from the Applicants explaining that they had identified a calculation error in the stated total volume of cable protection.

6.1.2 The MMO confirms that these changes do not materially affect the advice provided here within this document.

7. MMO's comments on the updated Offshore In Principle Monitoring Plan (REP5-079)

7.1 Adaptive Measurements

7.1.1 The MMO acknowledge the updates made to the In Principle Monitoring Plan (IPMP) to include adaptive management methods and are satisfied with this approach.

7.1.2 The MMO aims to implement a more proactive process to manage issues in the event that monitoring shows a greater impact than that assessed in the ES.

7.1.3 The MMO recommends standard Condition wording and refers to our response at Deadline 4.

8. MMO's comments on the updated Dredge and Disposal Site Characterisation Plan (REP5-081)

8.1 General Comments

8.1.1 The MMO notes that the Applicants have clarified that a Controlled Flow Excavator will be the only method used for sandwave clearance. The MMO defers to NE for its suitability.

8.1.2 The MMO notes that a new Commitment (CoT134) has been introduced to include micro-siting of the offshore export cables where successful burial could pose risks. The MMO is content with this approach and how its secured within the Schedules.

8.2 Fisheries and Fish Biology

8.2.1 The MMO notes a list of mitigation commitments relevant to the export cable installation process and the MMO is content with the measures captured.

8.2.2 The MMO supports the Applicant's preliminary cable burial risk assessment in Section 4 which considers the risk of cable snagging by fishing vessels and anchors, and which has been used inform the recommended cable burial depth of 3 metres.

8.3 Disposal Site Allocation

8.3.1 The MMO highlights the issues regarding the proposed disposal site coordinates overlapping.

8.3.2 The Applicants are looking to amend these in early November 2025. The MMO is content with the revised Condition wording in Part 1, paragraph 2(g) of Schedule 14 and Schedule 15.



9. MMO's comments on the Cumulative Effects Assessment and In-Combination Assessment (REP5-099)

9.1 Fisheries and Fish Biology

9.1.1 The MMO notes that the amendments reflect the progress made in nearby projects which had been scoped into the cumulative and in-combination assessment at the ES stage.

9.1.2 The MMO recognises that information on scheduling may not be available, the Applicants do not fully describe which stages of MMTA project development will overlap with the construction/operation/decommissioning stages of the East Irish Sea Transmission Project and the Moir Vannin Offshore Wind Farm Project.

9.2 Benthic Ecology

9.2.1 The MMO does not have any comments or concerns regarding the amendments made at Deadline 5.

9.3 Physical Processes

9.3.1 The MMO confirms that the amendments have raised no new concerns that have not been previously raised or addressed during examination.

9.4 Underwater Noise

9.4.1 The MMO does not believe these updates introduce entirely new methodologies or assessments for underwater noise but updates the CEA review to include new temporal and project data that could influence noise-related cumulative effects.

9.4.2 The MMO acknowledges that the updates do not escalate cumulative effects beyond the original "*minor adverse*" or "*negligible*" significance levels.

10. MMO's comments on the updated Without prejudice benthic compensation DCO schedule (REP5-108)

10.1 General Comments

10.1.1 The MMO does not have any comments or concerns regarding the amendments made to the document at Deadline 5. The MMO defers to NE for final comments on the MEEB.

11. MMO's response to the Applicants' response to Examiner's Questions 2 (ExQ2) (REP5-130)

11.1 General Comments

11.1.1 The MMO has reviewed and provided comments on the following topics:

- Physical Processes
- Habitat Regulation Assessment



12. MMO's comments on ExAs Procedural Decision (PD-010)

12.1 General Comments

12.1.1 The MMO notes that the Applicants submitted an intent to submit a request for changes to the Transmission Assets Application.

12.1.2 The MMO agrees with the conclusions reached by the ExA.

12.2 Examination Timetable Changes

12.2.1 The MMO notes that Examination deadlines have been adjusted to accommodate the submission of changes. The MMO welcomes these additions, however, the changes proposed are unlikely to affect MMOS jurisdiction. Therefore, we have not made any additional written submissions at Deadline 6.

13. MMOs comments on Issue Specific Hearing (ISH) 4 outcomes

13.1 General Comments

13.1.1 The MMO had a meeting with the Applicants on 2 October to discuss the project before the Hearings.

13.1.2 The MMO notes that ISH4 was held to discuss environmental, onshore and offshore matters, and the draft development consent order. The MMO's has provided a response to ISH 4 in this section.

14. MMOs comments on other Stakeholders Submissions

14.1.1 The MMO has reviewed other stakeholder Deadline 5 submissions and have provided comments on other Environment Agency (REP5-168) and Natural England (REP5-177, REP5-179, REP5-184) responses.

Yours Sincerely,

[Redacted Signature]

Marine Licensing Case Manager

[Redacted Email Address]

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