

Date: 22 October 2025
Our ref: 527960 Natural England's Covering Letter to Deadline 6
Morgan and Morecambe OWF Transmission Assets Project
Your ref: EN020028



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Dear David Cliff,

Morgan and Morecambe Offshore Wind Project: Transmission Assets

The following constitutes Natural England's formal statutory response for Examination Deadline 6.

1. Deadline 6 Submissions

Natural England has submitted the following documents at Deadline 6:

- EN020028 527960 Morgan and Morecambe Offshore Wind Transmission Assets - Appendix G6 - Natural England's Comments on Onshore Ecology Deadline 6;
- EN020028 527960 Morgan and Morecambe Offshore Wind Transmission Assets - Appendix K6 - Natural England's Risk and Issues Log Deadline 6;
- EN020028 527960 Morgan and Morecambe Offshore Wind Transmission Assets - Appendix M6 - Natural England's Comments to the RIES Deadline 6; and
- EN020028 527960 Morgan and Morecambe Offshore Wind Transmission Assets - Appendix N6 - Natural England's Answers to the Examining Authority's Request for Further Information Rule 17 Letter Deadline 6.

2. Updates to the Risk and Issues Log at Deadline 6

Natural England has reviewed the documents submitted by the Applicant at Deadline 5. 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. Applicant's Change Request

The Applicant's submitted a change request [references CR1-006 to CR1-026] on 8 August 2025. The ExA has decided to accept the change application. At Deadline 5 the Applicant submitted updated versions of the application document to reflect the accepted changed application. Natural England has no comments to make on the updated documents in relation to the change request.

4. Statement of Common Ground (SoCG)

Natural England has agreed a SoCG with the Applicant based on their proposed DCO, Benthic Ecology, Physical Processes, Fylde MCZ, Marine Mammals, Fish and Shellfish Ecology, Offshore Ornithology and Onshore and Intertidal Ecology statements. However, we note that pertinent Onshore Ecology issues raised in our Written Representation at Deadline 1 are not reflected in the SoCG.

Therefore, the final Principal Area of Disagreement Summary Statement (PADSS) and our Risks and Issue Log are considered effective tools, for all thematic areas, for understanding where Natural England has determined issue resolution and where outstanding areas of disagreement remain and the implication of these.

5. Onshore and Intertidal Ornithology Matters

Natural England have undertaken extensive engagement with the Applicant on onshore and intertidal ornithology matters through pre-application advice and then through engagement during Examination (both statutory and through our Discretionary Advice Service). However, we are aware that further issues have been raised from aviation stakeholders during the latter stages of the Examination with regards to bird strike risk and attractant risk from the mitigation areas.

It has become apparent from the Rule 17 Letter and transcript of the ISHs that the Applicant may in some circumstances have to implement active management measures to control bird attraction at the request of aviation stakeholders. We highlight to the ExA that our advice provided to date is based on the mitigation areas being deliverable as submitted (and amended by subsequent updates to key documents). Therefore, our engagement and comments have focussed on the ecological suitability of the mitigation areas **without** the prospect of active management measures potentially being needed to control bird attraction.

We will continue to work with the Applicant to address issues Natural England raised in our original Relevant Reps regarding the mitigation areas, and we wish to highlight to the ExA that progress has been made on most of these issues throughout Examination, as shown in our updated R&I log at Deadline 6 (PADSS Tab and Tab H). Unfortunately, however there is insufficient time before the close of Examination for Natural England to provide meaningful comment on an entirely new suite of mitigation measures or alternative mitigation proposed by the Applicant, even were these to be developed to a level of detail that would enable such consideration.

6. Report on the Implications for European Sites (RIES)

Natural England has provided a response to the RIES in Appendix M6 to Natural England's Deadline 6 submission. We highlight that whilst the RIES only accounts for European Sites, DEFRA's MPA compensation guidance (2021) states that there should be no differentiation between Marine Protected Areas, therefore equal weighting is given to Marine Conservation Zones (MCZs) and European sites,

with regard to compensation requirements. Therefore whilst there are no questions or further information on MCZs within the RIES, we highlight our comments raised regarding the requirement for Measures of Equivalent Environmental Benefit (MEEB) and strategic compensation during our Relevant Reps [RR-1601], response at Deadline 2 [REP2-062] and comments in our R&I log at Deadline 6, (PADSS Tab and Tab I and Tab J).

Yours sincerely,

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Cheshire to Lancashire Area Team

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Annex 1: Natural England's Response to the Applicant's Documents Submitted at Deadline 5

PINS Document Reference	Document Name	Natural England's Response/Position Summary
Deadline 5 – 22 September 2025		
REP5-011	C1_MMTA_Draft Development Consent Order_F06_F07_Tracked	Natural England's comments regarding this document are included in tab A of the R&I Log (Appendix K6).
REP5-020	E2.3_MMTA_Information to support Appropriate Assessment part 3_F01_F02_Tracked	Natural England's comments regarding this document are included in tab H of the R&I Log (Appendix K6).
REP5-023	E4_MMTA_Stage 1 Marine Conservation Zone Assessment_F01_F02_Tracked	Natural England's comments regarding this document are included in tab I of the R&I Log (Appendix K6).
REP5-026	F1.5.3_MMTA_ES_Commitments Register_F05_F06_Tracked	Natural England has no comments to make on this document at Deadline 6.
REP5-025	F1.3_MMTA_Project Description_F03_F04_Tracked	Natural England has no comments to make on this document at Deadline 6.
REP5-031	F2.1_MMTA_ES_Physical Processes_F02_Clean	Natural England's comments regarding this document are included in tab B of the R&I Log (Appendix K6).
REP5-033	F2.2.4_MMTA_ES_Marine mammals_F01_F02_Tracked	Natural England's comments regarding this document are included in tab E of the R&I Log (Appendix K6).
REP5-035	F2.2_MMTA_ES_Benthic subtidal and intertidal ecology_F01_F02_Tracked	Natural England's comments regarding this document are included in tab C of the R&I Log (Appendix K6).
REP5-036	F2.5_MMTA_ES_Offshore ornithology_F01_F02_Tracked	Natural England's comments regarding this document are included in tab F of the R&I Log (Appendix K6).

REP5-039	F3.3.3_MMTA_Phase 1 Habitat, National Vegetation Classification and Hedgerow Survey TR_F02_F03_Tracked	Natural England's comments regarding this document are included in tab G of the R&I Log (Appendix K6) and Appendix G6- Comments on Onshore Ecology.
REP5-041	F3.4_MMTA_ES_Onshore and intertidal ornithology_F02	Natural England's comments regarding this document are included in tab F of the R&I Log (Appendix K6).
REP5-060	J1.7_MMTA_Outline Soil Management Plan_F02_F03_Tracked	Natural England's comments regarding this document are included in tab G of the R&I Log (Appendix K6).
REP5-069	J6 Outline Ecological Management Plan (Tracked) – Rev F05	Natural England's comments regarding this document are included in relevant tabs of the R&I Log (Appendix K6).
REP5-077	J15 Outline Offshore Cable Specification and Installation Plan (Clean) - Rev F03	Natural England has no comments to make on this document at Deadline 6.
REP5-080	J20 Offshore In Principle Monitoring Plan (Tracked) - Rev F04	Natural England has no comments to make on this document at Deadline 6.
REP5-095	S_D1_9 Stage 2 MCZ Assessment (Tracked) - Rev F02	Natural England's comments regarding this document are included in tab I of the R&I Log (Appendix K6).
REP5-102	S_D3_6 Outline Hydrogeological Risk Assessment for Lytham St Anne's Sand Dunes (Tracked) - Rev F02	Natural England's comments regarding this document are included in tab G of the R&I Log (Appendix K6) and Appendix G6- Comments on Onshore Ecology.
REP5-107	S_D3_8 Outline Wildlife Hazard Management Plan (Tracked) - Rev F02	Natural England has no comments to make on this document at Deadline 6.
REP5-108	S_D3_9 Without prejudice benthic compensation DCO schedule (Clean) - Rev F02	Natural England has no comments to make on this document at Deadline 6.
REP5-112	S_D4_14 Sand Lizard Mitigation Plan (Clean) - Rev F02	Natural England's comments regarding this document are included in tab G of the R&I Log (Appendix K6).
REP5-117	S_D4_22 Outline Landfall Construction Method Statement (Tracked) - Rev F02	Natural England's comments regarding this document are included in tab G of the R&I Log (Appendix K6) and Appendix G6- Comments on

		Onshore Ecology.
REP5-147	S_D5_13 Adverse Effect on Integrity of the Ribble Estuary Special Protection Area - Supporting Statement - Rev F01	Natural England has no comments to make on this document at Deadline 6.
REP5-148	S_D5_15 Sand Lizard Survey Technical Note - Rev F01	Natural England's comments regarding this document are included in tab G of the R&I Log (Appendix K6) and Appendix G6- Comments on Onshore Ecology.
REP5-149	S_D5_16 Draft EPS licence application package - Rev F01	Natural England's comments regarding this document are included in tab G of the R&I Log (Appendix K6) and Appendix G6- Comments on Onshore Ecology.
REP5-150	S_D5_19 Great Crested Newt Letter of No Impediment - Rev F01	Natural England has no comments to make on this document at Deadline 6.