

Date: 03 October 2024
Our ref: 488771 Natural England's Covering Letter to Deadline 1 Morgan
OWF Project
Your ref: EN01036



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BY EMAIL ONLY

Dear Susan Hunt,

Morgan Offshore Wind Project: Generation

The following constitutes Natural England's formal statutory response for Examination Deadline 1.

Deadline 1 Submissions

As stated in our rule 6 response of 23 August 2024, in the interests of early resolution of issues, Natural England combined our Relevant Representation and Written Representations which were submitted on 10 July 2024 [RR-026].

As outlined within our representation, we deferred further comments on the In-Principle Monitoring Plans (IPMP) [APP-066] and outlined our intention to submit a Risks and Issues Log at Deadline 1.

Natural England have submitted the following documents at Deadline 1:

- EN01036 488771 - Morgan Offshore Wind Project: Generation - Appendix H1 - Natural England's Comments on J11 Morgan Generation Offshore In-Principle Monitoring Plan [APP-066] – Deadline 1
- EN01036 488771 - Morgan Offshore Wind Project: Generation - Appendix I1 - Natural England's Risk and Issues Log Deadline 1
- EN01036 488771 - Morgan Offshore Wind Project: Generation - Appendix J1 - Natural England's Principal Areas of Disagreement Summary Statement (PADSS) Deadline 1

1. Risk and Issues Log and Engagement through Examination

Natural England has submitted a Risk and Issues Log, which aims to track progress on the issues raised in our relevant/written representations. It is anticipated that the Risk and Issues Log will be updated and submitted alongside our submissions during examination at each deadline to reflect any progress in issue resolution during examination.

Natural England wishes to highlight 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) 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 will be used to track issue progress and we will signpost to our advice where applicable. Likewise, if the Applicant wishes to provide a signposting document that directs us and the ExA to where they address our concerns with tracked changes in the various plans/documents/assessments then that would be welcomed.

Please note that due to resource constraints, unless there is a significant change to the project design or changes in the Applicant's position in relation to the points raised here and within our Relevant Representations, Natural England will no longer be providing full marine mammal advice or updating the Risk and Issues log for marine mammals for this Examination.

2. Statement of Commonality for Statements of Common Ground (SoCG), Principal Areas of Disagreement Summary Statements (PADSS) and other progress tracking documents

Natural England note that as per the request of the ExA, the Applicant has provided a Progress Tracker and Statement of Commonality for Statements of Common Ground. Natural England will submit our own Risk and Issues log to sit beside the Applicant's Statement of Commonality of SoCG. An updated Risk and Issues log will be provided at all Deadlines (1-6). This will include any relevant points regarding ongoing engagement with the Applicant.

Natural England observes that the definitions of risk within the traffic light system proposed by the Applicant in the Statement of Commonality for SoCG differ to the definitions for risk within Natural England's own Relevant Representations risk rating system. Whilst we are not commenting on the rating given to specific thematic areas at this stage, we advise that because no issues with Natural England are coloured red or orange, this does not accurately represent the levels of risk and disagreement that still exist regarding key receptors. There are a number of red and amber issues where disagreement exists within Natural England's own risk rating system.

As per the Rule 6 letter, Natural England have submitted our Principal Areas of Disagreement Summary Statement (PADSS) in place of a SoCG at Deadline 1. Unless the ExA advise otherwise, we will also submit an updated final PADSS at Deadline 6 rather than input to an Applicant-led final SoCG. We hope this will be of assistance to the ExA in understanding Natural England's current outstanding issues and on demonstrating progress on issue resolution. We also hope that this will assist the Applicant in updating their Statement of

Commonality of SoCGs at the relevant stages.

3. Documents received at the Pre-Examination Procedural Deadline

We note that the Applicant has submitted documents prior to the Pre-Examination Procedural Deadline. Natural England has reviewed these documents and where relevant, provided responses and updates within our Risk and Issues Log.

Yours sincerely,

Elliott Waltho / Kathleen Bealby
Cheshire to Lancashire Area Team

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