

Date: 22 October 2024
Our ref: 489980 Natural England's Covering Letter to Deadline 2 Morgan
OWF Project
Your ref: EN01036



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Dear Susan Hunt,

Morgan Offshore Wind Project: Generation

The following constitutes Natural England's formal statutory response for Examination Deadline 2.

1. Deadline 2 Submissions

Natural England has reviewed the relevant documents submitted by the Applicant at Deadline 1. Please find an update of Natural England's position regarding these documents in Table 1 below, including anticipated timing of responses. In addition, Natural England is also submitting the following detailed responses, signposted from Table 1, within the following thematic appendices:

- EN01036 489980 - Morgan Offshore Wind Project: Generation - Appendix I1 - Natural England's Risk and Issues Log Deadline 2

2. Applicant's Deadline 1 submissions in relation to offshore ornithology

Natural England notes that the Applicant has submitted several documents relevant to our key concerns on offshore ornithology at Deadline 1. Due to the volume of documents to review and the need to provide consistent SNCB advice across the Mona and Morgan Projects, Natural England will provide a response to these documents at Deadline 3.

As a general comment on the documents submitted, we note that the Applicant has carried out multiple quantifications of impacts based on different approaches and parameters (i.e. the Applicant's preferred approach and the SNCBs advised approach). For example, results from the CEA and in-combination gap filling note (REP1-010) have not been propagated through

into the Applicant's updated assessments. Therefore we highlight that it is difficult to follow what impact estimates the Applicant intends on using in the Application and which documents they are located in. This will be essential for future projects to access in order to populate their cumulative and in-combination assessments. We therefore request that, once SNCB methodological concerns have been addressed, that the Applicant submits a 'final position' summary document into Examination that details or tabulates the impact estimates according to the SNCB advised approach and that of the Applicant.

3. Technical notes to address the first set of Issue Specific Hearing (ISH) Action Points

While Natural England welcomes the provision of the technical notes to address the first set of Issue Specific Hearing (ISH) Action Points relating to environmental matters; Natural England advises that unless there are further updates to Environmental Statement (ES) chapters, and/or named plans, any responses and commitments made by the Applicant within these documents will not be secured and therefore will not necessarily be 'pulled through' to the post-consent phases.

We therefore require our risks and issues to be addressed by the Applicant in updated ES chapters, named plans and DCO/dML conditions, in order to provide a clear audit trail through to the post consent phases. All documents (including technical notes) should be clearly catalogued by the Applicant for easy reference during these phases (some of which last 10+ years) as the Planning Inspectorate (PINs) do not retain this information on their website.

In order to not confuse matters during the remainder of the Examination and reflecting the number of outstanding issues; it would be beneficial for the Applicant to focus on updating the Environmental Statement and/or named plans to reflect outcomes/agreements/commitments during Examination. If this is not undertaken, where the Applicant's representations have structured their responses as standalone 'comments on comments', Natural England will only be able to provide limited responses.

4. Documents received at the Pre-Examination Procedural Deadline

We note that the Applicant 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. We have provided a summary of Natural England's response/position summary on each of these documents in Annex 1 of this letter for clarity.

Yours sincerely,

Elliott Waltho / Kathleen Bealby

Cheshire to Lancashire Area Team

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Annex 1: Natural England’s Response to the Applicant’s Documents Submitted at the Pre-Exam Procedural Deadline and Deadline 1 Relevant to our Remit

PINS Document Reference	Document Name	Natural England’s Response/Position Summary
Pre-Exam Procedural Deadline – 27 August 2024		
PD1-001	Pre-Exam Procedural Deadline Submission - Procedural Deadline Cover Letter	Natural England has no comments to make on this document.
PD1-002	Pre-Exam Procedural Deadline Submission - The Applicant’s Errata Sheet	Natural England provided an update in our Risk and Issues Log across several topic areas at Deadline 1 in relation to this document.
PD1-004	Pre-Exam Procedural Deadline Submission - The Applicant’s Examination Progress Tracker and Statement of Commonality	Natural England provided a comment on this in section 2 of our cover letter for Deadline 1 (ref: EN010136 488771).
PD1-009	Pre-Exam Procedural Deadline Submission - Annex 3.4 to the Applicant’s Response to Relevant Representation from Natural England and Natural Resources Wales: Interrelated Effects	Natural England provided an update in our Risk and Issues Log (Marine Mammals tab) at Deadline 1 in relation to this document.
PD1-0010	Pre-Exam Procedural Deadline Submission - Annex 3.5 to the Applicant’s response to Relevant Representations from Natural England (RR-026) and Natural Resources Wales (RR- 027): Impacts on Marine Mammals and Elevated Underwater Sound Due to Vessel Use	NE notes the document Annex 3.5 submitted at the pre-examination procedural deadline and comments made within. We have reviewed this document; however, it has not addressed our written concerns.
PD1-0011	Pre-Exam Procedural Deadline Submission - Annex 3.6 to the Applicant’s response to Relevant Representations from Natural England (RR-026.E.7)	Natural England provided an update in our Risk and Issues Log (Fish and Shellfish Ecology tab) at Deadline 1 in relation to this document.
PD1-0012	Pre-Exam Procedural Deadline Submission - Annex 3.7 to the Applicant’s Response to Relevant Representations from Natural England: RR-026.GEN.21	Natural England provided an update in our Risk and Issues Log (SLVIA tab) at Deadlines 1 and 2 in relation to this document.
PD1-0013	Pre-Exam Procedural Deadline Submission - Annex 3.7 to the Applicant’s Response to Relevant Representations from Natural	Natural England provided an update in our Risk and Issues Log (SLVIA tab) at Deadlines 1 and 2 in relation to

PINS Document Reference	Document Name	Natural England's Response/Position Summary
	England: RR-026.A.21 Appendix A: 39.6° Horizontal frame of view wireline and photomontages –Part 1 (Figures 75 – 95)	this document.
PD1-0014	Pre-Exam Procedural Deadline Submission - Annex 3.7 to the Applicant's Response to Relevant Representations from Natural England: RR-026.A.21 Appendix A: 39.6° Horizontal frame of view wireline and photomontages – Part 2 (Figures 96 – 117)	Natural England provided an update in our Risk and Issues Log (SLVIA tab) at Deadlines 1 and 2 in relation to this document.
PD1-0015	Pre-Exam Procedural Deadline Submission - Annex 3.8 to the Applicant's response to Relevant Representations from Natural England (RR-026)	Natural England notes the Applicant's submission in relation to stranded assets and has no further comments to make. Natural England's position remains unchanged but envision no further engagement is required on this matter.
PD1-0016	Pre-Exam Procedural Deadline Submission - Annex 3.9 to the Applicant's response to the Relevant Representation by Natural England (RR-026.B.36)	Natural England notes the Applicant's response and has no further comments to make.
PD1-0017	Pre-Exam Procedural Deadline Submission - S_ PD_3 Applicant's Response to Relevant Representations	Natural England has reviewed these responses and where necessary updated our Risk and Issues Log at Deadlines 1 and 2. However, as stated in our response to the Rule 6 Letter, we do not intend to comment on any direct responses by the Applicant or other Interested Parties on our representations unless new technical information is included.
Offshore Ornithology – Deadline 1 Submissions		
REP1-010	S_D1_4.5 Annex 4.5 to Response to Hearing Action Point 15: Offshore Ornithology CEA and In-combination Gap-filling of Historical Projects Note	Natural England will provide a response to this document at Deadline 3.

PINS Document Reference	Document Name	Natural England's Response/Position Summary
REP1-011	S_D1_4.6 Displacement Rates Clarification Note	Natural England will provide a response to this document at Deadline 3.
REP1-012	S_D1_4.7 Annex 4.7 to Response to Hearing Action Point 15: Apportioning Sensitivity Analysis	Natural England will provide a response to this document at Deadline 3.
REP1-013	Annex 4.8 to Response to Hearing Action Point 15: Great Orme Head SSSI Clarification Note	Natural England has no comment to make on this document and defers to Natural Resources Wales (NRW).
REP1-027	S_D1_11 Offshore ornithology baseline characterisation (Tracked)	Natural England will provide a response to this document at Deadline 3.
General – Deadline 1 Submissions		
REP1-001	S_D1_1 Deadline 1 Cover Letter	Natural England has no comments to make on this document.
REP1-004	S_D1_3 Hearing Summaries Prelim Meeting and ISH1	Natural England has no comments to make on this document.
REP1-005	S_D1_4 Response to Hearing Action Points	Natural England has no comments to make on this document but notes the Applicant's response to Hearing Action Points in relation to stranded assets; HAP_ISH 1_11 and HAP_ISH 1_12. Natural England's position remains unchanged but envisions no further engagement is required on this matter.
REP1-007	S_D1_4.2 Annex 4.2 to Response to Hearing Action Point 11: Decision Letter of Triton Knoll Offshore Wind Farm Order 2013	Natural England notes the Applicant's submission in relation to stranded assets and has no further comments to make. Natural England's position remains unchanged but envisions no further engagement is required on this matter.
REP1-008	S_D1_4.3 Annex 4.3 to Response to Hearing Action Point 12: Examining Authority's	Natural England notes the Applicant's submission in relation to stranded assets and has no further comments to make. Natural England's position remains unchanged

PINS Document Reference	Document Name	Natural England's Response/Position Summary
		but envision no further engagement is required on this matter.
REP1-009	S_D1_4.4 Annex 4.4 Applicant's Response to Hearing Action Point HAP_ISH1_14: Applicants response to Seasonal Piling Restrictions	Natural England has no comments to make on this document and defers to the Marine Management Organisation (MMO).
REP1-017	S_D1_5 Report on Interrelationships with Other Infrastructure Projects	Natural England has no comments to make on this document. We will provide a response to the Applicant's Offshore Ornithology CEA and In-combination Gap-filling of Historical Projects Note at Deadline 3.
REP1-018	S_D1_6 The Applicant's Examination Progress Tracker and Statement of Commonality	Natural England provided a comment on this in section 2 of our cover letter for Deadline 1 (ref: EN010136 488771).
REP1-020	S_D1_7 The Applicant's Errata Sheet (Tracked)	Natural England acknowledge the Applicant's errata sheet and where necessary, updates have been provided in our Risk and Issues Log in relation to this document. If ornithology comments are required in response to this document, these will be provided at deadline 3.
REP1-022	S_D1_8 Draft Development Consent Order (Tracked)	Natural England has provided an update in our Risks and Issues log in relation to this document.
REP1-024	S_D1_9 Explanatory Memorandum (Tracked)	Natural England has no comments to make on this document.
REP1-025	S_D1_10 Schedule changes to dDCO	Natural England has provided updates where necessary in our Risk and Issues Log in relation to this document.