

The Planning Inspectorate  
Temple Quay House  
2 The Square  
Bristol  
BS1 6PN

By email:

Date: 12 November 2024

For the attention of: Susan Hunt

Dear Susan,

**PROPOSED MORGAN OFFSHORE WINDFARM**

**PLANNING INSPECTORATE REFERENCE: EN010136**

**OUR REFERENCE: AOS-21167-0035-EN010136**

**RE: NATURAL RESOURCES WALES' RESPONSE TO THE EXAMINING AUTHORITY'S  
FIRST WRITTEN QUESTIONS**

Thank you for your Rule 8 letter, dated 12 September 2024, requesting Cyfoeth Naturiol Cymru / Natural Resources Wales' (NRW) comments regarding the above.


Please find below NRW's Response to the Examining Authority's first set of written questions (ExAQ1), published on 29 October 2024.

These comments/question responses should be read in conjunction with advice previously provided into the examination.

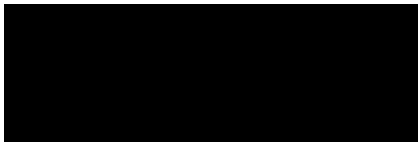
The comments provided in this submission comprise NRW's response as a Statutory Party under the Planning Act 2008 and Infrastructure Planning (Interested Parties) Regulations 2015 and as an 'interested party' under s102(1) of the Planning Act 2008.

Our comments are made without prejudice to any further comments or advice we may wish to make in relation to this application and examination whether in relation to the Environmental Statement (ES) and associated documents, provisions of the draft Development Consent Order ('DCO') and its Requirements, or other evidence and documents provided by RWE ('the Applicant'), the Examining Body or other interested parties.

Should further clarity be required, we will be pleased to answer these further through the Examining Authority questions and / or a Rule 17 request(s).

Please do not hesitate to contact Paige Minahan or Adam Cooper at  [cyfoethnaturiolcymru.gov.uk](mailto:cyfoethnaturiolcymru.gov.uk) should you require further advice or information regarding these representations.

Yn gywir / Yours sincerely,



**Andrea Winterton**  
**Marine Services Manager**  
**Natural Resources Wales**

[CONTINUED]

ExQ1	Question to:	Question:	NRW (A) response
<b>GEN Cross-Topic, General and Miscellaneous Questions</b>			
<b>Cross-Topic and General</b>			
GEN 1.3	The Applicant All Interested Parties	<p><b>Artificial Intelligence (AI)</b></p> <p>The Examining Authority (ExA) requests all parties taking part in the Examination to confirm if you have used AI to create or alter any part of your submitted documents, information or data in submissions up to Deadline 2.</p> <p>All future submissions are required to clearly confirm whether AI has been used to create or alter any part of those documents, information or data in accordance with the <a href="#">guidance</a> recently published by the Planning Inspectorate.</p>	NRW (A) have not used AI to create or alter any part of our submitted documents.

<b>HRA Habitats Regulations Assessment</b>			<b>NRW response</b>
HRA 1.1	Applicant Natural Resources Wales	<p><b>Habitats Regulations Assessment Derogation</b></p> <p>NPS EN-1 paragraph 5.4.27 states that a derogation case should be provided by an Applicant as soon as is reasonably possible and before the close of the examination if a Statutory Nature Conservation Body (SNCB) gives an indication in Examination that the Proposed</p>	<p>Of the sites listed by the ExA, these are all English SPAs, with the exception of Liverpool Bay SPA, which is a joint site located across English and Welsh waters. It is not within NRW's remit to comment on significance of impacts on English designated sites and hence we defer the answer to this question regarding these sites to Natural England. For Liverpool Bay SPA, which is a shared site between NE, NRW and JNCC, please see our response to question HRA 1.11 below.</p> <p>With regard to impacts to Welsh designated sites, please see our response to question HRA 1.2 below.</p>

Development is likely to adversely impact the integrity of habitat sites.

NE [RR-026 and REP1-053] have stated it is not satisfied that it can be excluded beyond reasonable scientific doubt that the Proposed Development would have an adverse effect alone or in-combination on the integrity of the following sites:

- Liverpool Bay Special Protection Area (SPA);
- Morecambe Bay and Duddon Estuary SPA and Ramsar;
- Ribble and Alt Estuaries SPA and Ramsar;
- Bowland Fells SPA;
- Isles of Scilly SPA;  
and
- Flamborough and Filey Coast SPA.

The ExA notes that in recent decisions on offshore windfarms, the Secretary of State has agreed that derogations cases are required in relation to effects on

		<p>the Flamborough and Filey Coast SPA.</p> <p>The Applicant is requested to provide an in principle derogations case in view of the SNCB position. The ExA is mindful of the Secretary of State's duties under the Conservation of Habitats and Species Regulations 2017 and the Conservation of Offshore Marine Habitats and Species Regulations 2017, and of the impact of this submission on the smooth running of the Examination.</p>	
HRA 1.2	Natural Resources Wales	<p><b>Welsh Designated Sites</b></p> <p>NRW <a href="#">[RR-027]</a>, point 25] has stated that it cannot yet reach conclusions on the level and significance of impacts to Welsh designated site features from the project alone, based on the information currently provided.</p> <p>NRW is requested to confirm its position whether an adverse effect beyond reasonable scientific doubt cannot be ruled out for any European site.</p>	<p>With regard to impacts from the project alone on Welsh designated sites, as the Applicant has undertaken various updates to assessment approaches (e.g. to apportioning, displacement assessments etc) all in isolation of each other and these updates haven't been transposed through to an overall updated assessment, nor have they provided apportioned impacts across the range of SNCB advised % displacement and % mortality rates or at least the full apportioned displacement matrices for some species and feature combinations, we consider it premature to reach conclusions on impacts from the project alone at present (see our comments on REP1-011 for further details).</p> <p>With regard to in-combination impacts, whilst the Applicant has undertaken a gap-filling for historic projects exercise in REP1-010, we note that where the Applicant has undertaken additional in-combination assessments for site/feature combinations in REP1-011 that were not previously assessed in the HRA Stage</p>

			<p>2 ISAA Part 3 (SPAs and Ramsars) [APP-098], such as for guillemot from Skomer, Skokholm and seas off Pembrokeshire SPA (see Section 3.4.2 of REP1-011), the Applicant has not currently included the gap-filled projects in their in-combination assessments they have presented and hence these contain several gaps and cannot be considered complete (as set out in our comments on REP1-011). Additionally we note that whilst the Applicant has provided in-combination assessments (with gaps) where impacts from the project alone exceeds 0.05% of baseline mortality, they have still not considered apportioned displacement impacts across the full ranges of SNCB advised % displacement and % mortality rates. We consider that a site/feature combination should be taken through to in-combination assessments where the project alone predicted impact exceeds 0.05% of baseline mortality at any scenario across the full range of advised rates. We note that this advice is consistent with that provided by both NRW and JNCC to the Mona project applicant, and we also note that this approach has now been followed by that applicant in their recent Deadline 3 assessments: <a href="https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010137/EN010137-001205-S_D3_19_Mona%20Offshore%20Ornithology%20Supporting%20Information.pdf">https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010137/EN010137-001205-S_D3_19_Mona%20Offshore%20Ornithology%20Supporting%20Information.pdf</a></p> <p>Given the above, we are not currently able to confirm definitively whether we consider that an adverse effect, beyond reasonable scientific doubt, cannot be ruled out for any European site. Whilst at this stage we can indicate that we consider it unlikely that there will be an Adverse Effect On Site Integrity for any European Site as a result of the Morgan development, this cannot be confirmed until both parties have had sufficient time to fully and comprehensively review current and forthcoming submissions. We also note that this advice is with respect to Welsh designated sites only. We defer advice on other sites (e.g. Scottish, Irish, English etc) to the respective SNCBs.</p>
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<p>HRA 1.4</p>	<p>Natural England Natural Resources Wales</p>	<p><b>Barrier Effects</b></p> <p>The Applicant states that “<i>The likelihood of the Morgan Array Area resulting in barrier effects for qualifying features of SPAs are low...</i>” (paragraph 1.4.5.16 of [APP-099]). The screening matrices [APP-099] further explain that this is due to the large foraging ranges used by seabirds and the large distances from the Morgan Array Area at which the SPAs are located. Do NE and NRW agree with the Applicant’s statements and that barrier effects can be screened out for all phases?</p>	<p>At present we note that there is no widely applicable method of directly assessing barrier effects.</p> <p>Barrier effects limit the migration, or free movement of individuals or populations, thus requiring them to divert from their intended path in order to reach their original destination. The impacts to birds from barrier effects are most likely through increased energetic costs flights, usually between breeding colonies and foraging areas, and/or increased time elapsed between provisioning of young. Individuals are less constrained during the non-breeding season, and therefore increases to overall flight costs due to barrier effects while on migration are likely to be very small (Topping &amp; Petersen 2011).</p> <p>Birds on the water and in flight are both included within the displacement assessment presented by the Applicant, as per SNCB advice (SNCBs 2022). Birds experiencing barrier effects are typically in flight, but not necessarily always so, therefore including birds in flight within a displacement assessment is the closest method available.</p> <p>For the Welsh seabird colony SPAs that may be impacted by the Morgan Generation Assets proposal (Skomer, Skokholm and the seas off Pembrokeshire / Sgomer, Sgogwm a Moroedd Penfro SPA; Grassholm SPA and Aberdaron Coast and Bardsey Island / Glannau Aberdaron ac Ynys Enlli SPA), for which NRW has responsibility, we do not consider that barrier effects are a significant consideration. This is because the proposed project is not located in a direct path between it and the key foraging areas contained within the marine portion of these SPAs or within other marine SPA foraging areas such as the Irish Sea Front SPA for Manx shearwater. Additionally, we do not consider that the proposal is likely to result in significantly increased energetic costs to individuals travelling from the SPA to foraging areas beyond the proposal. We also note that tracking data (e.g. from Votier et al. 2010) and utilisation distributions (e.g. Wakefield et al. 2013) suggest that gannets have been shown to display spatial segregation between colonies and that it is unlikely that gannets from</p>
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			<p>Grassholm SPA will forage in the Morgan Generation Assets area and hence barrier effects to individuals travelling from the SPA to foraging areas will be negligible for this colony.</p> <p>Foraging by both breeding and non-breeding qualifying features of the Liverpool Bay/Bae Lerpwl SPA occur within the SPA and therefore barrier effects due to the operational project array will not occur.</p> <p>With regard to barrier effects for migratory waterbirds travelling to and from non-breeding SPAs on the coast to breeding grounds, we do not consider that the proposal is likely to result in significantly increased energetic costs to individuals travelling additional distance twice a year to navigate around the project.</p> <p>Therefore, based on the above, NRW agrees with the Applicant's statement that barrier effects can be screened out of the assessment with respect to Welsh SPAs. We defer advice on other sites (e.g. Scottish, Irish, English etc) to the respective SNCBs.</p>
HRA 1.5	Applicant Natural England Natural Resources Wales	<p><b>In-combination Effects at Screening</b></p> <p>Section 1.4 of the HRA Stage 1 Screening Report [<a href="#">APP-099</a>] details the Applicant's overarching approach to assessing in-combination effects. For screening LSE in combination, it states that it is not necessary to consider in-combination effects for sites/features for which an LSE 'alone' has been identified – rather, it is for those where no LSE was</p>	<p>With regard to marine ornithology, at present we consider that there is the potential for an in-combination LSE for Welsh site/feature combinations. However until revised assessments (or as a minimum the full apportioned displacement matrices) for some site and feature combinations using the SNCB advised approaches to e.g. displacement (i.e. to consider impacts across the full range of advised % displacement and % mortality rates), and apportioned kittiwake collisions using the SNCB advised breeding season age-class apportionment rate for kittiwake rather than the Hornsea 2 approach are submitted by the Applicant, we are unable to provide advice.</p>



		<p>concluded. However, this is contradicted in numerous screening matrices which state that (ExA emphasis): “Where the additional mortality associated with the Morgan Generation Assets is zero birds <b>or it has been concluded for the project alone that there is no LSE it is considered that the Morgan Generation Assets will not act in-combination with other plans and projects and therefore no LSE is concluded</b>” (eg. Table 1.67 note g [<a href="#">APP-099</a>]).</p> <p>The ExA notes the Applicant’s commitment to assessing in-combination effects where no LSE from the project alone has been concluded, as set out in section 1.4 of the HRA Stage 1 Screening Report [<a href="#">APP-099</a>].</p> <ul style="list-style-type: none"> <li>i) Can the Applicant provide such an assessment, where this has not been done within the HRA and identify the projects or plans considered?</li> <li>ii) Do NE or NRW consider that there is the potential for an in-combination LSE</li> </ul>	
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		for any site/ feature where the Applicant has excluded a LSE from the project alone?	
HRA 1.9	Applicant Natural England Natural Resources Wales	<p><b>HRA Stage 2 Assessment – SAC Condition Assessments</b></p> <p>The Stage 2 SAC Report [<a href="#">APP-097</a>] notes that condition assessments are not available for a number of SACs. Can the Applicant and NE/ NRW confirm whether condition assessments have since become available or are likely to become available during the course of the examination for any of the following:</p> <ul style="list-style-type: none"> <li>• River Derwent and Bassenthwaite Lake SAC;</li> <li>• Solway Firth SAC;</li> <li>• North Anglesey Marine/ Gogledd Môn Forol SAC;</li> <li>• North Channel SAC;</li> <li>• Murlough SAC;</li> <li>• The Maidens SAC;</li> <li>• Bristol Channel Approaches/ Dynesfeydd Môr Hafren SAC;</li> <li>• Lundy SAC; and</li> <li>• Isles of Scilly Complex SAC.</li> </ul>	Regarding the SACs in Welsh waters with marine mammal features (North Anglesey Marine/ Gogledd Môn Forol SAC and Bristol Channel Approaches/ Dynesfeydd Môr Hafren SAC) there are no condition assessments available and there are not likely to be any available during the course of examination.

<p>HRA 1.11</p>	<p>Applicant Natural England</p>	<p><b>Environmental Management Plan and Liverpool Bay SPA</b></p> <p>NRW in its RR [RR-027] raises concerns around impacts to red-throated diver and common scoter of Liverpool Bay SPA from vessel movements, noting that the offshore EMP would include measures to minimise disturbance to rafting birds from transiting vessels. The Stage 2 SAC Report [APP-097] and Stage 2 SPA/Ramsar Report [APP-098] rely upon measures in an Offshore EMP to avoid adverse effects on marine mammal and offshore ornithological qualifying features.</p> <p>The Applicant has responded to concerns raised by NE and NRW [RR-026; RR-027] regarding potential disturbance and displacement impacts from vessel movements on qualifying features of Liverpool Bay SPA (page 144 [PD1-017]). NRW [REP1-056] has subsequently stated that “... <i>based on the adoption of best practice vessel operations to minimise disturbance it is likely that an AEoSI from operation and</i></p>	<p>Although directed at the Applicant, NRW (A) consider it pertinent to respond to this question.</p> <p>We remain concerned that the HRA Stage 1 Screening Report does not consider the potential for disturbance and displacement impacts from vessel movements in the construction or operation and maintenance phase on the red-throated diver and common scoter features of Liverpool Bay SPA. Please see deadline 3 submission, paragraph 16 for more details.</p> <p>We note and welcome the request from the ExA to the Applicant to provide an outline Offshore EMP. We again note the measures listed in Table 5.26 of Volume 2, Chapter 5 [APP-023] of adherence to an offshore Environmental Management Plan (EMP) that will include measures to minimise disturbance to rafting birds from transiting vessels (as set out in APP-070) and include a Marine Pollution Contingency Plan (MPCP). We note and agree that the offshore EMP is secured within the deemed marine licence (dML) in Schedule 3 Part 2 of the draft DCO [APP-005]. Therefore, based on the adoption of best practice vessel operations to minimise disturbance we would consider it is likely that an AEoSI from operation and maintenance vessel movements can be ruled out for these features of the SPA. However, given the location of Morgan Generation Assets project in English waters, we would recommend that the advice of Natural England is sought regarding this.</p>
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	<p><i>maintenance vessel movements can be ruled out...".</i></p> <p>Can the Applicant provide an outline Offshore EMP to provide assurance that all measures relied upon to avoid AEol are secured? This should include any proposed measures to minimise disturbance to rafting birds from transiting vessels, noting this is a specific concern of NE <a href="#">[RR-026]</a> and NRW <a href="#">[RR-027]</a> in relation to qualifying features of Liverpool Bay SPA.</p> <p>Can Natural England subsequently confirm whether the Applicant's response addresses their concerns and what mitigation, if any, would allow them to agree that an AEol could be excluded?</p>	
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MFS Marine Fish & Shellfish Ecology		NRW response	
MFS 1.2	<p>Marine Management Organisation Natural England Natural Resources Wales</p>	<p><b>Seasonal Exclusion Period for Piling</b></p> <p>A seasonal piling restriction has been suggested by Natural England [RR-026] and the MMO [RR-020] to mitigate underwater sound and vibration effects on herring and cod during installation of the offshore substation. The Applicant's Deadline 1 submission in response to Issue Specific Hearing 1 Action Point 14 [REP1-009] states that the application of blanket seasonal restrictions at this stage could be disproportionate to the ecological risk.</p> <ul style="list-style-type: none"> <li>i) What is the MMO and Natural England's view on the proportionality point?</li> <li>ii) Is any further evidence available to help define an appropriate and informed 'sensitive' exclusion period for the area of the Proposed Development?</li> <li>iii) Could a refined spatial piling exclusion area be defined instead of an exclusion period over the whole array area?</li> <li>iv) Noting that soft-start ramp ups has been explicitly rejected by the MMO, Natural England and NRW as a primary mitigation measure to reduce the risk of injury/mortality to fish, what type of measures are feasible and specific to fish that could prevent the need for a seasonal piling restriction?</li> </ul>	<p>As the development is within English territorial waters, NRW defer to advice from Natural England (NE) on all fish species not originating from Welsh protected sites.</p>

		<p>v) Are any changes necessary to the draft DCO/DMLs to reflect seasonal piling restrictions as a fallback position in the event that appropriate post consent controls/measures are not able to be agreed in the final Underwater Sound Management Strategy?</p>	
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ExQ1	Question to:	Question:	NRW response
MM 1.2	<p>Applicant Marine Management Organisation Natural England Natural Resources Wales</p>	<p><b>Concurrent Piling and Unexploded Ordnance (UXO) Clearance</b> Can the Applicant:</p> <p>i) Advise if it is feasible that piling and UXO clearance activities may be undertaken concurrently? If so what are the implications for potential injury/disturbance to marine mammals (and fish).</p> <p>Can the IPs:</p> <p>ii) Advise whether there is a necessity to restrict or control the possibility of</p>	<p>Regarding marine mammals NRW (A) would not be in support of concurrent piling with UXO clearance. Both activities can create impactful underwater noise in isolation let alone both occurring concurrently. We would advise the restriction and control of these activities as follows:</p> <p>UXO clearance alone should be restricted, to only low-order clearance charges in line with the 2022 SNCB position statement on UXO clearance where SNCBs explicitly stated that low order clearance should be the</p>

		concurrent piling and UXO clearance activities?	<p>default method. Inclusion of low-order clearance of UXO in the DCO and DML is advised. Additionally piling should follow the 2010 SNCB protocol for minimising the risk of injury to marine mammals from piling noise.</p> <p>As the development is within English territorial waters, NRW defer to advice from Natural England (NE) on all fish species not originating from Welsh protected sites.</p>
MM 1.5	<p>Marine Management Organisation</p> <p>Natural England</p> <p>Natural Resources Wales</p>	<p><b>Masking</b></p> <p>In relation to the assessment of effects from underwater sound on marine mammals the Applicant states at Paragraph 4.9.1.2 of ES Volume 2, Chapter 4 <a href="#">[AS-010]</a> that there is insufficient evidence to properly evaluate masking and no relevant threshold criteria to enable a qualitative assessment.</p> <p>Can the MMO, Natural England and NRW advise if they agree with this statement? If not can they suggest whether the Applicant needs to address the masking scenario?</p>	<p>NRW (A) are satisfied with the applicant's assessment of masking.</p>
MM 1.12	<p>Marine Management Organisation</p> <p>Natural England</p> <p>Natural Resources Wales</p>	<p><b>Cumulative Underwater Sound: Residual Effects</b></p> <p>The cumulative effects assessment in ES Volume 2, Chapter 4 Marine Mammals <a href="#">[AS-010]</a> identifies potentially significant adverse residual effects in terms of cumulative piling sound impacts on Bottlenose Dolphin and cumulative UXO clearance sound on harbour porpoise. The Applicant proposes that</p>	<p>NRW(A) can confirm that mitigation options exist to reduce the residual effects if implemented correctly. Notably these being the 2022 SNCB position statement on UXO clearance where SNCBs explicitly stated that low order clearance should be the default method. Inclusion of low-order clearance of UXO in the DCO and DML is both in agreement with the position statement and demonstrates more commitment to the low order</p>

		<p>mitigation measures will be developed in consultation with the licensing authority and SNCBs post-consent to reduce any potential residual effects for Bottlenose Dolphin and Harbour Porpoise.</p> <p>Can the MMO, Natural England and NRW confirm if they are confident that mitigation options exist to reduce the residual effects.</p>	<p>approach since no additional ML applications would be needed except in the case of a high order clearance. And for Piling mitigation the inclusion of the 2010 SNCB protocol for minimising the risk of injury to marine mammals from piling noise.</p>
MM 1.13	<p>Applicant Marine Management Organisation Natural England Natural Resources Wales</p>	<p><b>Cumulative Assessment – Injury due to Collision with Vessels</b></p> <p>Table 4.57 in ES Volume 2, Chapter 4 [<a href="#">AS-010</a>] relating to the cumulative increased likelihood of injury due to collision with vessels suggests that sound emissions from vessels will likely deter animals from the potential zone of impact.</p> <p>Given that this part of the Irish Sea is well-trafficked with vessels, and given the potential temporal and spatial overlap with other projects, can the Applicant, the MMO, NE and NRW clarify if there a possibility that an animal fleeing the sound of construction/maintenance vessels (or indeed piling/ UXO clearance) from one project might find themselves within the zone of influence of another project?</p>	<p>Yes, there is a possibility that an animal fleeing the sound of construction/maintenance vessels (or indeed piling/ UXO clearance) from one project might find themselves within the zone of influence of another project. This is in part due to the close vicinity of each of these projects (in particular Morgan, Mona and Morecombe), therefore there is a possibility that this may happen.</p> <p>There is a current lack of research and evidence on the effects of more than one impact pathway occurring on one population at a given time. Therefore, we are unable to rule out such effects on animals fleeing between sites in such close proximity.</p> <p>However, for piling specifically, there is probably less likelihood of this as simultaneous piling is unlikely to occur with the ZOI of all these projects given the limited number of piling vessels available to the industry, but more likely for other pathways.</p>



ExQ1	Question to:	Question:	
MO	Marine Ornithology		NRW response
MO 1.3	Natural England Natural Resources Wales	<p><b>Deadline 2 submissions for SNCBs review</b></p> <p>The ExA notes Natural England has confirmed it will provide at Deadline 3 a response to documentation submitted by the Applicant at Deadline 1, relevant to the SNCB's key concerns on offshore ornithology. Additional relevant documentation has been submitted by the Applicant at Deadline 2 [<a href="#">REP2-005</a>, <a href="#">REP2-021</a>, <a href="#">REP2-022</a>, <a href="#">REP2-023</a>].</p> <p>Natural England and NRW are requested to respond to documentation relevant to the SNCB's key concerns on offshore ornithology which has been submitted by the Applicant at Deadlines 1 and 2 and to confirm which elements of the Applicant's responses have addressed their concerns.</p>	NRW (A) have provided a response to the documentation submitted by the Applicant at Deadlines 1 and 2. Please see our deadline 3 submission.
MO 1.5	Natural Resources Wales	<p><b>Cumulative Effects Assessment Methodology 2</b></p> <p>NRW [<a href="#">RR-027</a>] refer to ongoing internal discussions regarding the development of an approach which may help address the issue of uncertainty with (qualitative) assessments of projects for which data is unavailable.</p> <p>Can NRW provide an update on this, including timescales, and any other relevant information which may assist in the ExA's consideration of this matter.</p>	We note that this comment has now been superseded by the joint SNCB discussion held with the Morgan Generation Assets project and Mona project Applicant's on 29 <sup>th</sup> August 2024, where their proposed approach to gap-filling of historic projects was discussed. The Applicant has subsequently submitted at Deadline 1 a note on 'Offshore Ornithology CEA and in-combination gap filling of historical projects' in REP1-010. NRW (A) have provided a response to this document in our deadline 3 submission.

<p>MO 1.10</p>	<p>Natural England Natural Resources Wales The Applicant</p>	<p><b>Kittiwake Age Apportioning</b></p> <p>Natural England (Appendix B B35 <a href="#">[RR-026]</a> and Appendix I1 B27, B35, B50 <a href="#">[REP1-053]</a> and NRW (paragraph 21 <a href="#">[RR-027]</a> and paragraph 50 <a href="#">[REP1-056]</a>) have not reviewed the displacement assessment for Kittiwake because it is not considered to be an accurate reflection of SNCB advice. The use of the kittiwake adult proportion that was calculated for Hornsea 2 is considered by both Natural England and NRW to be inappropriate to apply to Morgan Generation Assets.</p> <p>The Applicant's response (RR-026.B.68 and RR-027.27 <a href="#">[PD1-017]</a>) maintains, as discussed in ES Volume 4, Annex 5.5: Offshore ornithology apportioning technical report <a href="#">[APP-057]</a>, the approach applied is ecological valid whilst remaining precautionary and is still highly likely to return an immature proportion that is an underestimate (and therefore over-estimate the adult proportion). NRW are also directed to section 1.3.3 of the 'Orme Head SSSI Clarification Note' <a href="#">[REP1-013]</a> regarding apportioning of kittiwake in the breeding season.</p> <p>Natural England and NRW are asked to confirm if they are satisfied with the Applicant's response or whether any additional information or assessment is required.</p>	<p>NRW (A) advises that the Applicant's response (RR-056.29 and RR-056.30 <a href="#">[PD1-017]</a>) does not address our initial advice. We reiterate that the SNCBs do not support the Applicant's methodology which was developed by Hornsea Project Two to undertake kittiwake age apportioning. We continue to advise that the Applicant use the 84.11% of adults recorded in the Morgan site-specific DAS data to undertake kittiwake age apportioning and submit this into Examination.</p> <p>We do however note and welcome that in Section 1.3.3 of the Applicant's 'Great Orme's Head SSSI Clarification Note' <a href="#">[REP1-013]</a>, the Applicant has not applied the Hornsea 2 approach to kittiwake age-class apportioning and has instead taken the most precautionary approach of assuming all birds are adults. We suggest the Applicant also considers revising its use of the Hornsea 2 age-class apportionment approach for all the other assessed designated sites (i.e. SPAs) for kittiwake.</p>
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		Can the Applicant confirm whether using 84.11% of adults for the breeding season (in line with the advice from the SNCBs) would result in a material change to its ES and HRA assessments.	
MO 1.11	Natural Resources Wales	<p><b>Pen y Gogarth / Great Orme Head Site of Special Scientific Interest (SSSI)</b></p> <p>The Applicant's response [<a href="#">REP1-013</a>] to NRW's RR [<a href="#">RR-027</a>] provides further clarification and updated assessments regarding species that are features of the Pen y Gogarth / Great Orme Head SSSI (kittiwake, guillemot and razorbill).</p> <p>NRW are asked to confirm if it is satisfied with this response or whether any additional information is required.</p>	NRW (A) have provided a response to the Applicant's Deadline 1 'Great Orme's Head SSSI Clarification Note' document [ <a href="#">REP1-013</a> ] in our deadline 3 submission.

ExQ1	Question to:	Question:	NRW response
SLV 1.7	Historic England Natural England Natural Resources Wales	<p><b>National and International Designations</b></p> <p>The SLVIA study area includes the following designated sites:</p> <ul style="list-style-type: none"> <li>• Isle of Anglesey National Landscape</li> <li>• The Lake District National Park</li> <li>• The English Lake District World Heritage Site</li> </ul> <p>Historic England, Natural England and NRW are asked whether they have any specific comments to make on ES Volume 4, Annex 10.5: International and nationally designated landscape study [<a href="#">APP-038</a>], as this is not referenced in responses received to date. The IPs are also directed to Question [HE 1.11] and may wish to combine answers.</p>	NRW are happy with the decision in the SLVIA to scope out statutory designated landscapes in Wales and have no comments on ES Volume 4 Annex 10.5.