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Your ref: EN010121



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BY EMAIL ONLY

Dear Ben Million,

Planning Act 2008 and The Infrastructure Planning (Examination Procedure) Rules 2010

Application by Morecambe Offshore Windfarm Limited (“the Applicant”) for an Order granting Development Consent for the proposed Morecambe Offshore Windfarm Project: Generation Assets (“the Proposed Development”)

The following constitutes Natural England’s formal statutory response to the Secretary of State’s Request for Information (RFI) dated 22 October 2025. To inform this response Natural England has reviewed **EN010121-001379-C3-003B - 10.2.1 Appendix A Consideration of Mooir Vannin Offshore Windfarm Environmental Impact Statement and East Irish Sea Transmission Project Scoping Report**



Natural England notes that it has not registered an interest in the Mooir Vannin Offshore Windfarm (MVOWF) Examination. The Isle of Man Government and JNCC are the relevant regulatory and statutory bodies to provide comment on environmental matters in this instance. Natural England has not reviewed the Mooir Vannin Environmental Impact Statement. Therefore, Natural England’s comments in this letter are solely in response to the Applicant’s review of this Environmental Impact Statement and its implications for the Morecambe OWF in the above referenced document.

Reference	Comment
2.1.3 Fish and Shellfish Ecology and Marine Mammals Para 22	<p>Natural England agrees that the non-overlapping construction schedules reduce the potential for any cumulative impacts for these receptors.</p> <p>The Applicant has committed to using noise reduction and/or abatement measures during piling. The Applicant notes that the Underwater Sound Management Strategy (REP5a-042) will be updated post-consent to refine and agree the required mitigation measures. The scope of these measures will therefore be developed post consent and could be made with consideration for any changes in construction schedules that may result in concurrent piling.</p>
Table 2.5	<p>Natural England advises that the cumulative effect on great black-backed gull with the inclusion of MVOWF would remain moderate adverse and thus be significant at the EIA scale. The conclusion of “slight or moderate adverse” made by MVOWF, with a significant effect only occurring for moderate adverse effects, should not be considered reason to reduce the level of effect concluded for the Morecambe OWF cumulative assessment, as additional collision risk cannot reduce the overall risk.</p>

2.1.4.2 In-combination assessment (HRA) Table 2.6 Para 30	Natural England notes that the Applicant has indicated where their conclusion in respect of the potential for AEOL is in disagreement with Natural England's advice. For lesser black-backed gull at Morecambe Bay and Duddon Estuary SPA and at Ribble and Alt Estuaries SPA, Natural England continues to advise that an AEOL in-combination cannot be ruled out and notes that MVOWF predicts a small additional contribution to collision risk mortality to these sites
2.2 East Irish Sea Transmission Project	<p>Natural England agrees that given the level of information currently available for the EIST Project, it is not possible to make meaningful cumulative or in-combination conclusions at this stage.</p> <p>Natural England notes that the EIST Project intended grid connection location of Penwortham substation means that it is highly likely to pass through Liverpool Bay SPA. Should the Morecambe OWF be operational without an appropriate distance between the eastern turbines and the SPA when EIST is being constructed, there is the potential for this to represent a further constraint on the EIST project (which would in turn need to be taken account of in their in-combination assessment).</p>

For any queries relating to the content of this letter please contact me using the details provided below.

Yours faithfully,


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