

Date: 08 April 2025
Our ref: Case: 18251 Consultation: 480575
Your ref: EN010121



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BY EMAIL ONLY

Dear Robert Jackson,

Morecambe Offshore Windfarm Generation Assets

The following constitutes Natural England's formal statutory response for Examination Deadline 5.

1. Natural England's Deadline 5a Submissions

Natural England has reviewed the documents submitted by the Applicant at Deadline 5. Due to the additional nature of Deadline 5a, Natural England's submission is focused on responses to ExQ3, commentary specifically requested by the ExA in its Rule 8 letter of 17th March 2025, and other updates to our advice that are directly connected to these requests. We are submitting the following detailed responses:

- Appendix B11 Natural England's advice on Offshore Ornithology at Deadline 5a
- Appendix B12 Natural England's advice on lesser black-backed gull compensation quantum at Deadline 5a
- Appendix I3 Natural England's response to Examiners Questions 3
- Natural England's Risk and Issues Log at Deadline 5a

The Risk and Issues Log contains updates only for those issues covered as described above.

Natural England will provide a full update to its Risk and Issues Log accounting for Deadline 5 and Deadline 5a submissions from the Applicant, any further necessary topic specific advice, a final Principal Areas of Disagreement Summary Statement (PADSS) and any necessary final position statements on unresolved issues at Deadline 6. For documents submitted by the Applicant at Deadline 5 which receive a further update at Deadline 5a, we will ensure that it is clear which version our comments at Deadline 6 are in relation to.

2. Natural England's Position on noise management measures

In January 2025, Defra published their Marine Noise Package including their 'Reducing Marine Noise' policy paper [Reducing marine noise - GOV.UK](#). This paper includes the expectation that *'all offshore wind pile driving activity across all English waters will be required to demonstrate that they have utilised best endeavours to deliver noise reductions through the use of primary and/or secondary noise reduction methods in the first instance.'* Natural England does not consider a commitment to employ best endeavours constitutes a commitment to use NAS as it does not go far enough to provide confidence and certainty that a project will implement either primary or secondary NAS and therefore noise reduction at source may not be achieved.

Natural England is therefore supportive of the steps taken by the Applicant for this project so far, which displays a positive commitment to implementing NAS, as detailed in the updates to the MMMP [REP5-028] and UWSMS [REP5-053]. In order to provide confidence and certainty that the Applicant will implement either primary or secondary NAS, NE strongly advises that a general commitment to the use of NAS should appear on the face of the DCO as mitigation to ensure the satisfactory alternatives test for EPS licensing can be passed and significant noise reductions can be achieved.

Natural England's references to NAS in a general sense includes both primary and secondary measures intended, respectively, to reduce the noise produced initially at the source or to prevent the propagation of noise into the environment.

Natural England does not stipulate or advocate for any particular noise reduction system and the Applicant is free to secure the most appropriate noise abatement system or noise mitigation technology they can between consent and construction. Natural England would welcome the opportunity to engage with the Applicant in this regard post-consent.

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

Yours sincerely,

[Redacted Signature]

Marine Senior Officer, Cumbria Team

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

PINS Document Reference	Document Name	Natural England's Response/Position Summary
Marine Mammals		
[REP5-028]	6.5.1 Draft Marine Mammal Mitigation Protocol_Rev 04 Tracked	Reviewed in support of answers to ExQ3 in Appendix I3 and advice above on NE's position on noise management
[REP5-053]	9.32.1 Outline Underwater Sound Management Strategy_Rev 03 Tracked	Reviewed in support of answers to ExQ3 in Appendix I3 and advice above on NE's position on noise management
Offshore ornithology		
[REP5-015]	5.1.12 Chapter 12 Offshore Ornithology Rev_03	Natural England's Response to this document is provided in Appendix B11 and in updates to our Risk and Issues Log
[REP3-009]	4.11.1 Habitats Regulations Assessment Without Prejudice Derogation Case - Revision 03 (Volume 4) (Tracked)	Reviewed in development of advice in Appendix B12
General		
[REP5-061]	The Applicant's Comments on Natural England's Risk and Actions Log at Deadline 4 - Revision 01 (Volume 9)	Reviewed in support of answers to ExQ3. See Appendix I3
[REP5-026]	6.4.1 In Principle Monitoring Plan_Rev 04_Tracked	Reviewed in support of answers to ExQ3. See Appendix I3
[PD1-011]	8.3 The Applicant's Response to Relevant Representations	Reviewed in support of answers to ExQ3. See Appendix I3