



THE PLANNING ACT 2008

THE INFRASTRUCTURE PLANNING (EXAMINATION PROCEDURE) RULES
2010

Morecambe Offshore Wind Farm: Generation Assets

Appendix L to Natural England's Deadline 6 submission.

**Natural England's responses to the Examining Authority's Report on the Implications
for European Sites (RIES)**

For:

The construction and operation of the Morecambe Generation Offshore Wind Farm located
approximately 30 km off the Northwest English Coast in the Irish Sea.

Planning Inspectorate Reference EN010121

15 April 2025

Table 1. Natural England's comments on the Examining Authority's Report on the Implications for European Sites

Ref.	Page ref.	Question to:	Question	Natural England's Response
RIESQ1	9	NE	The ExA notes your request for the applicant to update the Technical Note on the Assessment of Offshore Impacts on Bats over the Irish Sea [REP4-055]. It also notes concerns that impacts have not been fully considered, and your confirmation that the potentially affected bat species are not qualifying features of any relevant SACs. For the avoidance of doubt, could NE confirm that there are no additional European sites or impact pathways arising from this matter that should be screened into the HRA and that this matter can be considered as part of the EIA. If this is not the case, please explain why.	Natural England can confirm that there are no relevant European / National Site Network (NSN) sites or impact pathways that should be screened into the HRA in England. We advise that confirmation would need to be sought from the relevant country SNCBs for sites outside of England.
RIESQ2	14	JNCC NRW(A) RSPB DAERA NE	The applicant's conclusions of no LSE with respect to the sites above were not disputed by any ANCB during the examination. Can JNCC, NRW(A), RSPB, NE, and DAERA confirm if they agree with the conclusions?	Natural England can confirm that it agrees with the list of sites where the Applicant has concluded no LSE, for English sites only.
RIESQ5	20	JNCC NE	Noting the applicant's response [REP3-068, ExQ1BEM44] are parties content with the explanations provided and the assessments	Natural England confirms that it is broadly content with the rationale presented by the Applicant. It should be noted that the cumulative and in-combination ornithology assessments for NISA, Arklow Bank 2 and Oriel that the Applicant is relying upon may not follow the assessment methodology that Natural England required the

			included in the updated Screening Report [REP3-006] and RIAA [REP5-010].	<p>Applicant to use for their cumulative assessments. Natural England has not been consulted on any of these projects and so has not had the opportunity to review the methodology used for them, nor provide advice on appropriate cumulative assessment methodology.</p> <p>However, Natural England retains the view that the likelihood of a meaningful in-combination effect between these wind farms and the project is low, and any such contributions to impacts would therefore be, at worst, minor.</p>
RIESQ7	25	NE DAERA	Do you agree with the applicant's use of SPA conservation objectives in the assessment of effects on Ramsar sites? If not, suggest an alternative approach.	Natural England advises that this approach is acceptable where there is an overlap between the features of the relevant SPA and Ramsar sites.
RIESQ9	31	NE JNCC NRW(A) NatureScot RSPB	Provide a clear update regarding agreement and disagreement in relation to AEoI project alone and in-combination.	<p>Natural England disagrees with the conclusions of no AEoI made by the Applicant for the following assessments:</p> <ul style="list-style-type: none"> • Red-throated diver at Liverpool Bay SPA in-combination: Natural England advises that AEoI cannot be ruled out due to displacement impacts from WTGs • Lesser black-backed gull at Morecambe Bay and Duddon Estuary SPA in-combination: Natural England advises that AEoI cannot be ruled out due to collision impacts. • Lesser black-backed gull at Ribble and Alt Estuaries SPA in-combination: Natural England advises that AEoI cannot be ruled out due to collision impacts. <p>Natural England is in agreement with all other conclusions relating to AEoI for the project alone and in-combination.</p>

RIESQ14	45	JNCC MMO NE NRW(A)	Confirm if your concerns about the applicant's commitment to NAS, and its Outline MMMP [REP5-028] and Outline UWSMS [REP5-052] are resolved based on the updated versions submitted at D5. If not, provide a position statement setting out specific updates that you seek to the management plans.	As of Deadline 5a, the Applicant has included in the dDCO [REP5a-003] a condition requiring the use of noise reduction and/or abatement measures where driven or part driven piles are to be used. Natural England is confident that this commits them to delivery of these measures.
RIESQ16	50	NE	Confirm if you are content with the applicant's monitoring commitment for marine mammals outlined in the IPMP [REP3-045] insofar as it relates to potential effects on the Bristol Channel Approaches SAC. If not, explain any outstanding concerns.	Natural England refers the ExA to Appendix D2 of our Deadline 5 submission [REP5-079] in which we advise that we have no further concerns with the assessment or conclusions for Bristol Channel Approaches SAC. As the conclusion was that there would be no AEOI for any feature of this site, no site specific monitoring has been proposed and we are content with this approach.
RIESQ17	54	The Applicant NRW NE JNCC	Confirm agreement with or provide an update on outstanding matters in relation to the data inputs and methodology of the in-combination assessment.	Please refer to Appendix B11 to Natural England's Deadline 5a submission [REP5a-069] and our Deadline 5a Risk and Issues Log [REP5a-072].
RIESQ23	58	NE NRW	Provide a view on the concerns raised by RSPB.	Natural England acknowledges that there are limitations to the use of DAS to accurately characterise baseline densities and site use by Manx shearwater, and that there are uncertainties around impact pathways arising from OWF developments on this species. With respect to AEOI judgements at Skomer, Skokholm and seas off Pembrokeshire SPA we defer to NRW as the relevant SNCB. With respect to any impacts to the Lundy SSSI, given the likely level of connectivity and the level of risk associated with the development, we are content that Morecambe OWF will not have an adverse impact.

RIESQ24	60	NE	The ExA notes the position of RSPB. Are NE content with the assessment and its consideration of HPAI.	Natural England is content that the Applicants consideration of HPAI in its assessment is proportionate to the level of risk regarding English seabird receptors.
RIESQ27	67	NE The Applicant	Confirm whether parties are seeking to find agreement in relation to the conclusions of AEoI (in-combination) or whether discussions are focussing on compensation measures.	Natural England retains disagreement with the Applicants conclusion of no AEoI for lesser black-backed gull in-combination at the Morecambe Bay and Duddon Estuary SPA. See answer to RIESQ9 above, and Natural England's Risk and Issues Log submitted at Deadline 5a [REP5a-072]. We do not expect to find agreement on this issue, but we are working toward agreement on compensation measures for this impact and have provided advice on the compensation quantum for the proposed measures at Steep Holm Island. [REP5a-070]
RIESQ28	69	NE The Applicant	Confirm whether parties are seeking to find agreement in relation to the conclusions of AEoI (in-combination) or whether discussions are focussing on compensation measures.	Natural England retains disagreement with the Applicants conclusion of no AEoI for lesser black-backed gull in-combination at the Ribble and Alt Estuary SPA. See answer to RIESQ9 above, and Natural England's Risk and Issues Log submitted at Deadline 5a [REP5a-072]. We do not expect to find agreement on this issue, but we are working toward agreement on compensation measures for this impact and have provided advice on the compensation quantum for the proposed measures at Steep Holm Island [REP5a-070].
RIESQ29	72	NE	Do concerns remain in relation to the assessment of RTD as a qualifying feature of Liverpool Bay SPA? If so, set these out along with any further information required.	Natural England's outstanding concern regarding the RTD feature of Liverpool Bay SPA is the mitigation of impacts. Until the Applicant's Deadline 5a submission [REP5a-057] there has been no submission into Examination of assessments under different mitigation scenarios, i.e., implementing various buffer distances between the turbine array and the SPA. Please see Natural

				<p>England's advice on potential mitigation to allow a conclusion of no AEOL in-combination in RIESQ35 below.</p> <p>We also have concerns regarding both RTD and common scoter features of the Liverpool Bay SPA as regards construction and operations and maintenance ('O&M') vessels transiting the site. The Applicant has proposed an update to the Vessel Traffic Management Plan ('VTMP') [REP5a-035] to address these concerns. Natural England is now satisfied that the Applicant has included adequate measures based on Natural England's best practice protocol for vessels in Liverpool Bay SPA. This issue cannot be fully resolved as there is still no confirmation of which ports will be used for either construction or maintenance and therefore some uncertainty remains as to the effectiveness of these measures in practice.</p>
RIESQ35	90	NE The Applicant	<p>The ExA seeks the following information to enable further consideration of whether all alternatives have been considered. The applicant is requested to set out the number of turbines which could be removed from the proposed development with the proposed development being able to remain viable. NE is requested to set out the distance or threshold at which it would be able to conclude no AEOL.</p>	<p>Natural England advises that based upon the information provided by the Applicant at Deadline 5a [REP5a-057], the most conservative scenario in terms of reductions to the Project site under which AEOL in-combination could be ruled out is the 10km Shell Flat buffer scenario, which reduces disturbance to what is likely to be the key area of habitat for RTD within this part of the SPA, given the shallower water depths there. The SPA 8km buffer would cover the whole area included in the Shell Flat 10km buffer, with the additional benefit of reducing disturbance to a larger proportion of the original SPA boundary.</p> <p>AEOL could also be ruled out under the 7.5km SPA buffer scenario, which includes the majority of the Shell Flat 10km buffer. Under the notional turbine layout scenarios presented by the Applicant, this would result in the removal of the same WTG locations from the envelope, and thus the same reduction in disturbance for the Shell</p>

				<p>Flat area as the 10km Shell Flat scenario. However, we do note that other turbine layouts could still place a WTG inside the Shell Flat 10km buffer under this scenario and therefore result in some level of displacement within the Shell Flat area, and were the consent to be based on this scenario it would be appropriate to have a commitment to avoiding this. As with the 8km SPA buffer, the 7.5km SPA buffer would also provide the added benefit of reducing potential displacement effects to a larger proportion of the original SPA boundary.</p>
RIESQ37	93	The applicant NE	<p>Confirm whether compensation would be in place for the lifetime of the proposed development or another length of time, with justification.</p>	<p>Natural England would expect the compensation to be in place for at least the lifetime of the development, and only to be ceased following approval by the Secretary of State in consultation with Natural England. This is in line with the approach taken for seabird compensation measures for other projects. This is in place to guard against unintended consequences, for example to safeguard nationally or internationally significant populations that could arise at the compensation site(s) against habitat deterioration.</p>
RIESQ38	94	NE	<p>Confirm whether the compensation measures proposed by the applicant are sufficient to meet the compensation level required for both MDBE SPA and RAE SPA.</p>	<p>Natural England consider that the compensation measure proposed for lesser black-backed gull is sufficient to address the impacts at MDBE SPA and RAE SPA, subject to confirmation that the proposed area over which the measures will be implemented is at least that advised in Appendix B12 of our Deadline 5a submission [REP5a-070]: 0.21ha</p>
RIESQ41	99	NE The Applicant	<p>The ExA notes discussion in RR-061 and [REP5-083] regarding monitoring, however it has not been identified by the applicant as to whether this has been incorporated into the</p>	<p>The Compensation and Implementation Management Plan (CIMP) submitted at Deadline 5a [REP5a-014] now incorporates the appropriate monitoring for the LBBG compensation measure at</p>

			Compensation and Implementation Management Plan. Does NE have outstanding concerns in relation to this matter?	Steep Holm. This update has been reflected in the Risk and Issues Log submitted by Natural England at Deadline 6.
RIESQ43	101	NE	The Risk and Issue tracker offshore ornithology tab, item RIG26, suggests that the outline CIMP [REP3-064] is insufficiently detailed. The ExA assumes this comment relates to the red throated diver oCIMP provided at D3 [REP3-065] but it may also apply to the oCIMP accompanying the application [APP-030]. Can NE set out the specific detail that is necessary to be supplied by the applicant in the Report on the Implications for European Sites for Morecambe Offshore Wind Farm Generation Assets 102 oCIMP, explaining whether the commentary relates to either or both oCIMPs. Any comments should take into account whether it would be appropriate for the additional detail to be agreed post consent.	<p>The CIMP referred to in this comment is [REP3-065].</p> <p>Natural England notes that the Applicant has submitted a new Revision of the oCIMP for red-throated diver into examination at Deadline 5a [REP5a-049]. Natural England has reviewed this document and provided updates to the Risk and Issues Log for RI_G26 and other issues relevant to this document. There are still aspects of the CIMP that require development, so further work from the Applicant as regards specific locations and interventions to ensure that the measures can be secured must be undertaken as a priority.</p>