

Date: 06 October 2025  
Our ref: 480575  
Your ref: EN010121



Department for Energy Security and Net Zero  
Darlington Economic Campus  
Darlington  
DL1 5BF

Hornbeam House  
Crewe Business Park  
Electra Way  
Crewe  
Cheshire  
CW1 6GJ

T 0300 060 3900

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 05 September 2025. To inform this response Natural England has reviewed **C1-011 - Response to Secretary of State’s consultation 1**.

| Reference                              | Comment  |
|--|--|
| Section 2.2.2<br>Paragraph 10          | <i>“the Applicant notes that NE’s conclusion that a buffer of less than 10km distance from the original SPA boundary would represent no AEol for disturbance impacts on RTD in Liverpool Bay SPA reinforces the Applicant’s position presented in the Offshore Ornithology Technical Note 3”</i><br>NE comment: Our advice was that there are specific buffer scenarios below 10km that would not lead to AEOL, whereas this wording implies NE’s position is that any buffer below 10km avoids AEOL, which is not the case. Critically, the original project boundary represents a buffer below 10km that we consider would lead to AEOL. |
| Section 4 and<br>appendices 1<br>and 2 | Natural England acknowledges the progress made on RTD compensation measures and welcomes the identification of a sufficient number of lochs to deliver the approach as agreed with the Applicant. We note that the majority of the lochs are located on one estate, which presents a risk to delivering the planned level of compensation should an agreement not be reached with this estate.   |
| Section 5.2<br>Paragraph 52            | Natural England maintains the view that compensation measures carried out for LBBG at Steep Holm may additionally benefit GBBG, even though the works are not focussed on this species. We therefore welcome the proposed amendment to Article 18.   |

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

Yours faithfully,

[REDACTED]

Cumbria Team

E-mail: [REDACTED]@naturalengland.org.uk

Telephone: [REDACTED]