

Date: 19 January 2026
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Dear ██████████

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**The Examining Authority's written questions and requests for information (ExQ1):
Issued on 18 December 2025**

Examining Authority's submission deadline 2 with a date of 19 January 2026

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

This letter details Natural England's responses to the Examining Authority's First Written Questions.

Please see the attached Annex A for our detailed responses and note that all responses relate strictly to matters within Natural England's remit.

For any further advice on this consultation please contact me on the details below and copy to consultations@naturalengland.org.uk.

Yours sincerely

Angela Leigh
Senior Officer for Coastal Planning Casework
Cheshire to Lancashire Area Team
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Annex A. Natural England responses to ExQ1

xQ1	Question to:	Question:	Natural England response
1. General and cross-topic questions			
Q1.0.8	The applicant CWCC Environment Agency (EA) Natural England (NE)	<p>Pollution Control</p> <p>Paragraphs 4.12.2 and 4.12.10 of NPS EN-1 note that the planning and pollution control systems are separate but complementary, that pollution control is concerned with preventing pollution using measures to prohibit or limit the releases of substances to the environment, and to ensuring that ambient air, water, and land quality meet standards that guard against impacts to the environment or human health. It states that the Secretary of State (SoS) should work on the assumption that the relevant pollution control regime and other environmental regulatory regimes, including those on land drainage, water abstraction and biodiversity, will be properly applied and enforced by the relevant regulator.</p> <p>Paragraph 4.12.15 of NPS EN-1 requires the SoS to consider if the EA, any pollution control authority, Statutory Nature Conservation Bodies, Drainage Boards, water and sewerage undertakers, and other relevant bodies are satisfied that:</p> <ul style="list-style-type: none"> • potential releases can be adequately regulated under the pollution control framework; and • the effects of existing sources of pollution in and around the site are not such that the cumulative effects of pollution would make the Proposed 	<p>Natural England (NE) is satisfied that pollution impacts can be adequately controlled.</p>

xQ1	Question to:	Question:	Natural England response
1. General and cross-topic questions			
		<p>Development unacceptable, particularly in relation to statutory environmental quality limits.</p> <p>i) Please could the relevant bodies comment, highlighting any specific concerns?</p> <p>ii) Please could the applicant provide evidence of whether relevant bodies, including the water and sewerage undertakers, are satisfied and what concerns remain?</p> <p>iii) Please could the applicant set out the steps that will be taken to resolve any outstanding concerns?</p> <p>iv) Please could the relevant bodies and the applicant provide regular updates to the examination?</p>	
Q1.0.9	CWCC EA NE	<p>Local Authority and Other Statutory Body Resourcing</p> <p>Do the relevant bodies have any concerns about their resources for the consideration of submissions, approvals and monitoring necessary for the implementation of the proposed development?</p>	NE does not have any concerns.
3. Ground conditions			
3.1 Assessment			
Q3.1.2	CWCC, EA, NE	<p>Migratory pathways for contaminants</p> <p>Are you satisfied that the migratory pathways for contaminants within soils and perched groundwater and soil dusts to impact sites of special scientific interest (SSSI) and ecology within surface water and terrestrial habitats</p>	NE is satisfied with the applicant's assessment.

xQ1	Question to:	Question:	Natural England response
1. General and cross-topic questions			
		would not be significant in EIA terms. If you disagree with the applicant's assessment, provide relevant justification and evidence to support your position.	
3.2 Mitigation measures			
Q3.2.1	CWCC, EA, NA	<p>Migratory pathways for contaminants</p> <p>Are you satisfied that migratory pathways for contaminants within soils and perched groundwater and soil dusts to impact SSSI and ecology can be mitigated by measures such as Groundwater and Surface Water Management Plan? If no, please provide justification and relevant evidence to support your position.</p>	NE is satisfied with the proposed mitigation measures.
Q3.2.6	CWCC, EA, NE	<p>Mobile contaminants</p> <p>Are you satisfied that migration of leachable and otherwise mobile contaminants to groundwater within superficial deposits from soils and perched groundwater can be mitigated by the management practices noted by the applicant in its oCEMP [APP-136]?</p> <p>(Refer to Table 10-14: Assessment of Likely Impacts and Effects with Incorporated Mitigation Applied of Chapter 10 Ground Conditions [APP-043]). If no, please provide justification and relevant evidence to support your position.</p>	NE is satisfied with the proposed mitigation measures.
Q3.2.9	CWCC, EA, NE	<p>Mitigation approach for contaminants</p> <p>Further to the Issue Specific Hearing 1 and item agenda 5h, can you advise if you are satisfied with the applicant's management approach to:</p> <p>i) Elevated concentration of lead</p>	NE does not have any specific comments to make on this question.

xQ1	Question to:	Question:	Natural England response
1. General and cross-topic questions			
		ii) Polychlorinated biphenyls iii) Hydrocarbons in soils iv) Leachable contaminants from dredging materials v) Ground gases from the organic dredging silts and clay	
5	Q3.2.1 CWCC, EA, NE	Potential compaction and hydrological impact to peat Are you satisfied with the applicant's response [PD2-027] to CWCC's concern [RR-037] regarding potential compaction and hydrological impacts to peat, which state that ground investigation shows there is no peat present at depth which could be impacted by the proposed development? If not, please explain why not.	NE does not have any concerns in relation to peat.
4. Biodiversity and ecology			
4.0 Baseline conditions			
Q4.0.2	The applicant, CWCC, NE	Great Crested Newts Can you advise if restricted access to ponds/waterbodies within 0.5km of the Main Development Area could have a meaningful impact on the significance of effects assessment including mitigation for Great Crested Newts?	NE notes that there are no licensing requirements with regards to great crested newt therefore we have no specific comment to make on this question.
Q4.0.6	CWCC, NE, Cheshire Wildlife Trust (CWT)	Consideration of reptiles in the Environmental Statement Are you satisfied with the applicant's relevant representation response (reference CWACC7.85 [PD2-027]) that reptiles have been fully and appropriately considered in the Environmental Statement? If no, please	NE notes that there are no licensing requirements with regards to reptiles therefore we have no specific comment to make on this question.

xQ1	Question to:	Question:	Natural England response
1. General and cross-topic questions			
		provide justification and relevant evidence to support your position.	
4.1 Species			
Q4.1.2	CWCC, NE, CWT	Badger Paragraph 7.7.32 of Terrestrial Ecology [APP-040] notes that habitats will be largely retained and protected during the construction process. Can you please provide your comments on this statement and can NE confirm whether you intend to grant or refuse a licence to interfere with a badger sett for the purposes of the proposed development?	NE has not been approached by the applicant with regards to a badger licence request. The applicant should contact NE for further advice if a badger licence is required.
Q4.1.3	CWCC, NE, CWT	Badger and Otter Are you satisfied with the applicant's relevant representation response (reference CWACC7.88 [PD2-027]) that the proposed development would not adversely impact wildlife corridors or buffers? If no, please provide justification and relevant evidence to support your position.	NE notes that there are no licensing requirements with regards to badger and otter therefore we have no specific comment to make on this question.
Q4.1.4	The applicant, NE, CWCC	Bat Can you comment on whether spring surveys, additional static detectors, and surveys of the NBBMA would alter the conclusion of no significant residual effects on bats?	NE notes that there are no licensing requirements with regards to bats therefore we have no specific comment to make on this question.
4.4 Mitigation measures			
Q4.4.2	CWCC, NE, CWT, MEGC	NBBMA Are you satisfied with:	i)NE previously commented on the applicant's use of the Cleve Hill Solar approach in our Relevant Representation (RR) response (NE46) and set out our

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1. General and cross-topic questions			
		<p>i) The applicant's Cleeve Hill Solar Park mitigation method to calculate the amount of NBBMA required to accommodate the types of non-breeding bird utilising the OL</p> <p>ii) The relevant representation response (reference CWACC7.51 [PD2-027]) that the NBBMA would provide adequate mitigation</p> <p>If no, please provide a summary and reasons for your position.</p>	<p>concerns regarding the methods and figures used. We note that the applicant has since provided further detail within Annex 1 of the Outline NBBMS.</p> <p>Overall NE does not consider the use of the Cleve Hill approach as a robust approach for this development and so it cannot be relied upon. This is based on the following reasoning:</p> <ul style="list-style-type: none"> • There is insufficient detailed data available from the entire SADA to input to the calculations. • The calculations only give a like for like figure in respect of arable land not grassland or wetland habitats and there is no metric that can be applied to give the area of mitigation of the type that is being proposed. • No reference or justification has been given to the bird-days figure given for curlew. NE is not aware of a figure that exists for curlew, and

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1. General and cross-topic questions			
			<p>so justification is required to explain how 1ha of land will feed the same number of curlews as lapwings, when a curlew is about 3 times the size of a lapwing.</p> <ul style="list-style-type: none"> • We consider the applicant misunderstands the meaning of the bird-days calculation. The applicant has stated that '<i>Applying a uniform BDC across the whole SADA footprint therefore incorporates large areas that support negligible or zero use by multiple qualifying features</i>'. However, where there is zero use, there are zero bird-days added to the calculation, and where there is minimal use, only minimal bird-days are added to the calculation. In addition, a mean of the bird counts is used, this takes account of zero counts. <p>Used correctly in the right circumstances the calculation can be a helpful way of assessing mitigation needs because it does not overestimate requirements</p>

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1. General and cross-topic questions			
			<p>based on area lost that might be used only occasionally, but it gives a way of not dismissing that occasional use. However, we do not consider that the bird-days calculation can be used for this particular development.</p> <p>ii)NE is satisfied that the NBBMA will provide adequate mitigation via an uplift in habitat quality as:</p> <ul style="list-style-type: none"> • The site investigations show that the scrapes and wet grassland areas based on the earthworks proposed can be delivered. • Water balance calculations (Annex 4 of Appendix B Outline NBBMS) show that the wetland is deliverable. Better water level control will mean that the quality of the NBBMA will be more reliable, which is an improvement over the current situation. • The improved sward management will lengthen the season that the grassland is in suitable condition for SPA birds.

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1. General and cross-topic questions			
			<ul style="list-style-type: none"> Improved habitat quality across the NBBMA with better management will increase the capacity sufficiently to accommodate displaced birds and so help to reduce the impacts of the development and avoid an AEOI. <p>Our advice is given subject to the NBBMA being managed by an appropriate conservation body and that an Adaptive Management Plan (AMP) is included as part of the detailed NBBMS. The AMP must set out the further measures that may be required to ensure the success of the habitat creation and appropriate water and grassland management. This may range from identification of further adaptive changes to the management practices within the NBBMA or the inclusion of additional areas of land that could be managed for non-breeding birds in addition to the NBBMA.</p>
Q4.4.3	The applicant, CWCC, NE	Frodsham windfarm mitigation areas Can you respond to CWT's relevant representation [RR-019] that the applicant should not be re-allocating Frodsham windfarm mitigation areas for its NBBMA and	NE advises it is possible to have mitigation on the same parcel of land which is an existing mitigation area, subject to a sufficient uplift in habitat

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1. General and cross-topic questions			
		should be providing additional mitigation areas on top of that?	quality to mitigate for all birds displaced by both developments.
Q4.4.6	CWCC, NE, CWT	<p>Mersey SSSI</p> <p>Are you satisfied that the mitigations proposed by the applicant will mitigate any harmful aspects of the proposed development on the Mersey SSSI and, where possible, would conserve and enhance the SSSI affected by the proposed development?</p>	<p>NE provided updated comments on the Mersey Estuary SSSI in our recent Written Representation (WR) response. We have outstanding concerns which need to be addressed, noting that there are coinciding impacts on non-breeding bird features of the SSSI, and issues in relation to the works that will take place within part of the Mersey Estuary SSSI. We welcome further clarification from the applicant on our comments within our WR.</p>
4.5 Assessment			
Q4.5.1	CWCC, NE, CWT, Mersey Estuary Conservation Group (MECG)	<p>Environmental Statement conclusions for terrestrial ecology</p> <p>Are you content with the applicant's assessment in its Terrestrial Ecology Chapter 7 (Vol 1) [APP-040] that there would be no residual significant effects as a consequence of the proposed development? If you disagree with the applicant's assessment, please provide justification and relevant evidence to support your position.</p>	<p>Natural England does not have any further concerns beyond those already outlined within our WR.</p>
Q4.5.4	NE, CWCC, CWT, MECG	<p>Impacts on Local Wildlife Site (LWS)</p> <p>Can you advise if you agree with the applicant's assessment that although there would be significant</p>	<p>NE does not have any specific comments to make on this question.</p>

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1. General and cross-topic questions			
		temporary adverse effects on Frodsham, Helsby and Ince Marshes LWS during the construction phase, and that there would be significant positive effects in the medium-long term? If you disagree with the applicant's assessment, please provide justification and evidence to substantiate your position.	
Q4.5.5	The applicant CWCC, NE, CWT, MEGC	Frodsham, Helsby and Ince Marshes LWS Can the applicant confirm if its significance of effects conclusion (during permitted preliminary works/construction, operation, and decommissioning stages) took into account Frodsham, Helsby and Ince Marshes LWS qualifying features? If any party believes the applicant's significance of effects conclusion omitted any qualifying features associated with Frodsham, Helsby and Ince Marshes LWS, please provide justification and evidence to substantiate your position.	NE does not have any specific comments to make on this question.
Q4.5.6	CWCC, NE, CWT, MEGC	Noise assessment Are you satisfied with the applicant's noise assessment and that there would be no significant effect on any species? If you disagree with the applicant's assessment, please provide justification and relevant evidence to support your position.	NE is satisfied with the applicant's noise assessment, this has been confirmed in our WR. We are satisfied that impacts with regards to noise can be mitigated.
Q4.5.7	CWCC, NE, CWT	Biodiversity net gain metric Are you satisfied that the latest BNG metric [PD2-032] : i) Follows best practice/guidance? ii) Contains the necessary information?	NE does not have any specific comments to make on this question.

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1. General and cross-topic questions			
		iii) That habitat, hedgerow and watercourse are classified accurately? iv) The metric results are correct? If no, please provide justification and relevant evidence to support your position.	
Q4.5.8	CWCC, NE, CWT	Biodiversity net gain proposal Are you satisfied with the Applicant's assessment that the proposed development will deliver a measurable gain in biodiversity units? The project design committed to achieving a minimum increase of 10 % in habitat and hedgerow units and no net loss in watercourse units (paragraph 7.7.66 of ES Chapter 7: Terrestrial Ecology [APP-040]). If no, please provide justification and relevant evidence to support your position.	NE does not have any specific comments to make on this question.
4.6 Policy			
Q4.6.2	The applicant, CWCC, NE, CWT	NPS EN-1 Can you comment whether paragraph 4.6.7 of NPS EN-1 has been satisfied which notes that the latest version of the biodiversity metric is encouraged and that calculation data for biodiversity baseline and present planned biodiversity net gain outcomes are presented in full as part of the application?	NE does not have any specific comments to make on this question.
Q4.6.3	CWCC, NE, CWT, MEGG	NPS EN-1 Are you satisfied that the proposed development meets the following paragraph in NPS EN-1:	NE does not have any specific comments to make on this question.

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1. General and cross-topic questions			
		<p>paragraph 4.6.15 Applications for development consent should be accompanied by a statement demonstrating how opportunities for delivering wider environmental net gains have been considered, and where appropriate, incorporated into proposals as part of good design (including any relevant operational aspects) of the project. If no, please provide justification and relevant evidence to support your position.</p>	
5. Habitats Regulations Assessment			
5.1 Assessment			
Q5.1.3	NE	<p>NE's conclusions on likely significant effects and AEol Can NE confirm whether it agrees with the applicant's conclusions in respect of likely significant effects and AEol for the European sites and features considered in the Information to Inform Habitats Regulations Assessment (the HRA Report) [PD2-009] which are not specifically referenced in its RR [RR-012]?</p>	<p>NE agrees with conclusions for likely significant effects and no Adverse Effect on Site Integrity (AEoSI) that are not referenced within our RR.</p>
Q5.1.4	NE	<p>Functionally linked land NE in its RR [RR-012] highlights concerns in relation to the definition utilised for functionally linked land (FLL) and the need for the HRA to ensure the assessment considers the SADA as a whole as FLL and provide suitable mitigation for all FLL affected. The applicant provided an updated HRA Report [PD2-009] at Procedural Deadline B which incorporates additional data analysis and clarifies the applicant's approach to FLL. Can NE confirm whether it is content that its comments in relation to this matter have</p>	<p>NE is satisfied that this matter has been resolved now.</p>

xQ1	Question to:	Question:	Natural England response
1. General and cross-topic questions			
		been resolved and whether they consider the proposed NBBMA to be sufficient for the entire SADA?	
Q5.1.5	NE, CWCC	<p>In-combination assessment</p> <p>NE [RR-012] and CWCC [RR-037] have provided advice on the approach and projects to be considered within the in-combination assessment. The applicant's Response to Local Planning Authority and Statutory Environmental Body Relevant Representations [PD2-027] submitted at Procedural Deadline B provides a response to the matters raised.</p> <p>Can NE and CWCC confirm whether they agree with the applicant's approach and projects to be considered within the in-combination assessment?</p>	<p>NE welcomes the additional information provided by the applicant with regards to in-combination however we consider that there are matters outstanding which require further consideration by the applicant. Our detailed advice is given within our WR.</p>
Q5.1.7	The applicant, NE, CWCC,	<p>Redshank</p> <p>i) Can you confirm if passage redshank is a qualifying feature of the Mersey Estuary SPA and whether it should appear as such in Chapter 8 of the ES [APP-041] and the Information to Inform the Habitats Regulations Assessment [PD2-010]?</p> <p>ii) If so, and noting that redshank was recorded in ornithological surveys during September [APP-082], for example, should the assessment of possible AEol in relation to redshank from the Mersey Estuary SPA (including those using the functionally linked land) clearly address the wintering flock and the passage flock separately?</p>	<p>i) Redshank is a non-breeding feature for the Mersey Estuary SPA and is recorded correctly as such within both the ES and HRA.</p> <p>ii) NE is satisfied with the assessment of redshank within the HRA.</p> <p>There is no requirement for separate assessment of passage and wintering birds.</p> <p>iii) Data from the BTO Wetland Bird Survey (WeBS) for the Mersey Estuary</p>

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1. General and cross-topic questions			
		<ul style="list-style-type: none"> iii) Which months of the year might passage redshank be expected to be present, and do the ornithological surveys adequately cover these autumn and spring periods in terms of the survey dates and the number of surveys carried out? iv) Could disturbance avoidance mitigation measures of a similar nature to those identified to avoid an AEol of the wintering qualifying bird species be required to avoid an AEol of a passage redshank qualifying feature? v) Noting the intention to start construction works on the non-breeding bird mitigation area in March and the possibility of these extending into November, could these include extended seasonal restrictions on noisy and otherwise disturbing construction activities in addition to physical mitigation commitments? If so, what should these be? 	<p>(which includes the SPA/Ramsar and wider areas) shows that redshank are present in large numbers between August and April, however the data for the specific sector that covers the Western SADA and Cell 6 does not show particularly high numbers of redshank at any time of year.</p> <p>NE is satisfied that the surveys are sufficient with regards to redshank in view of the WeBS data, further supported by the survey data gathered by the applicant.</p> <p>iv)NE does not consider specific mitigation measures are required for Redshank.</p> <p>v)NE is satisfied that additional mitigation is not required for redshank.</p>
Q5.1.9	The applicant	<p>Zone of influence</p> <p>The HRA identifies European sites within a Zone of Influence (Zol) of 10km from the OL.</p> <ul style="list-style-type: none"> i) Can the applicant provide a justification as to why the 10km Zol buffer utilised is considered 	<p>NE is satisfied that there are no further European sites that require consideration within the HRA.</p>

xQ1	Question to:	Question:	Natural England response
1. General and cross-topic questions			
		<p>sufficient? The applicant is requested to consider NE's definition of FLL in its response.</p> <p>Can NE confirm whether it considers that any additional European sites should have been identified in addition to those already identified within the HRA Report?</p>	<p>NE is satisfied with the buffer distance applied by the applicant with regards to FLL for the Mersey Estuary SPA/Ramsar.</p>
5.2 Mitigation			
Q5.2.1	NE, CWCC	<p>Mitigation proposals for habitat loss affecting SPA species</p> <p>NE [RR-012] and CWCC [RR-037] state that they do not consider that sufficient information has been provided to demonstrate that the mitigation proposals for habitat loss for SPA species are satisfactory. The applicant provided further information in the updated NBBMS (contained within the OLEMP [PD2-023]) which included a Water Balance Report (Annex 4) at Procedural Deadline B.</p> <p>i) Can NE and CWCC confirm whether they consider adequate information has been provided to demonstrate that the mitigation proposals for habitat loss affecting SPA species are satisfactory, and if not, identify any outstanding issues?</p> <p>Additionally, can they confirm whether they are satisfied with the updated details on the long-term management of the mitigation area?</p>	<p>NE provided detailed comments within our WR on the matters outstanding with regards to the NBBMS.</p> <p>Our remaining main concerns regarding the NBBMS relate to the securing of a conservation body to undertake the long-term monitoring and management of the NBBMA.</p> <p>We welcome the applicant providing a letter from the RSPB regarding their position with regards to the NBBMA, and that they have an ongoing interest in the long-term management of the area.</p> <p>Confidence can be taken from this and it does help overcome our concerns to some extent. However, we wish to have further updates from the applicant on their ongoing discussions with RSPB to ensure</p>

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1. General and cross-topic questions			
			<p>there is a firm commitment in place prior to decision.</p> <p>It is fundamental to the NBBMS that a conservation body take on the long-term management, but equally that they are on board and involved with detailed design of the NBBMA too. For this reason, the NBBMS should include a firm commitment to having a conservation body as the management body and not 'suitably qualified and experienced personnel will be employed and / or contracted by the Applicant' as has been stated within the NBBMS.</p> <p>We do not consider that there are other suitable personnel that could manage the NBBMA to the required level to ensure success of the mitigation area and accordingly provide sufficient certainty with regards to the HRA.</p>
Q5.2.2	The applicant, NE, CWCC	<p>Quantity and type of habitat loss</p> <p>Limited detail has been provided within the HRA Report [PD2-009] with regard to the quantity and type of habitat loss.</p>	<p>ii)NE is satisfied that the habitats proposed within the NBBMA will meet the habitat requirements of displaced SPA birds. The habitat diversity and size of habitats as proposed within the NBBMA is</p>

xQ1	Question to:	Question:	Natural England response
1. General and cross-topic questions			
		i) Can the applicant please provide further detail on these matters including reference to the timeframes for each proposed habitat component within the NBBMS to become functional? ii) Can NE and CWCC confirm whether they agree with the applicant's proposed NBBMA habitat components and whether they consider the NBBMA to be of a sufficient size and habitat makeup to mitigate for the loss of land within the entire SADA?	accepted on the basis that they will provide additional suitable habitat of high quality that will be subject to high level grassland and water level management to create optimum conditions for SPA birds across the entire non-breeding season on a consistent year to year basis, supporting SPA bird populations and ensuring no AEoSI.
8. The water environment			
8.0 Assessment			
Q8.0.3	CWCC, NE, EA	ES conclusions Are you content with the applicant's assessment that there would be no residual significant effects as a consequence of the proposed development? If you disagree with the applicant's assessment, please provide justification and relevant evidence to support your position.	NE does not have any specific comments to make on this question.
8.1 Mitigation Measures			
Q8.1.4	The applicant, CWCC, NE, EA	Sampling and analysis Can you summarise what sampling and analysis of the water environment should/would be undertaken prior and during the permitted preliminary works?	NE does not have any specific comments to make on this question.
9. Other planning issues			

xQ1	Question to:	Question:	Natural England response
1. General and cross-topic questions			
9.4 Noise, vibration and nuisance			
Q9.4.2	The applicant, CWCC, NE	<p>Piling</p> <p>For the construction phase, the assessment [APP-054] assumed the use of non-percussive mini piling for the solar panels and non-percussive continuous flight augur piling for the BESS.</p> <p>To ensure the integrity of the assessment, should those piling methods be secured and should it be secured that percussive piling would not be permitted?</p>	<p>NE advises that the piling methodology is secured, the assessment has been undertaken to account for non-percussive piling and any changes to this will invalidate the assessment conclusions. Should percussive methods be required as an alternative for use during construction then these should be assessed at this stage.</p>