

MORGAN AND MORECAMBE OFFSHORE WIND FARMS: TRANSMISSION ASSETS

Annex 2.5 to Applicants' Response to Deadline 4 submissions from Statutory Consultees and other organisation: Natural England

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Contents

1	APPLICANTS' RESPONSE TO IP SUBMISSION AT DEADLINE 4- NATURAL ENGLAND	1
1.1	Introduction.....	1
2	APPLICANTS' RESPONSE TO WRITTEN REPRESENTATIONS- NATURAL ENGLAND	2
2.1	Natural England REP4-138 – Natural England (Covering Letter to Deadline 4)	2
2.2	Natural England REP4-141 – Appendix J4 to Natural England's Deadline 4 Submission	4
2.3	Natural England REP4-140 – Appendix G4 to Natural England's Deadline 4 Submission	6
3	RESPONSE TO NATURAL ENGLAND'S RISK AND ISSUES LOG (REP4-139)	9
3.2	Principal Areas of Disagreement Summary Statement (PADSS).....	11
3.3	Risk and Issues Log – DCO and dMLs	32
3.4	Risk and Issues Log – Physical Processes	35
3.5	Risk and Issues Log – Benthic Subtidal and Intertidal Ecology	49
3.6	Risk and Issues Log – Fish and Shellfish Ecology	67
3.7	Risk and Issues Log – Marine Mammals	70
3.8	Risk and Issues Log – Offshore Ornithology	80
3.9	Risk and Issues Log – Onshore Ecology	84
3.10	Risk and Issues Log – Onshore and Intertidal Ornithology	100
3.11	Risk and Issues Log – Fylde MCZ	117
3.12	Risk and Issue Log – Benthic Compensation	125
4	REFERENCES	134

Tables

Table 2.1: REP4-138 – Natural England (Covering Letter to Deadline 4).....	2
Table 2-2: REP4-141- Appendix J4 England's comments on the Applicant's Without Prejudice Benthic Compensation DCO Schedule	4
Table 2-3: REP4-140 – Appendix G4 Natural England's comments on the Outline Hydrogeological Risk Assessment of Lytham St Annes Dunes SSSI	6
Table 3-1: NE's Risks and Issues Log colour coding	9
Table 3-2: Responses to Principal Areas of Disagreement Summary Statement (PADSS).....	11
Table 3-3: Responses to questions regarding the DCO and dMLs.....	32
Table 3-4: Responses to questions regarding Physical Processes	35
Table 3-5: Responses to questions regarding Benthic Subtidal and Intertidal Ecology	49
Table 3-6: Responses to questions regarding Fish and Shellfish Ecology	67
Table 3-7: Responses to questions regarding Marine Mammals	70
Table 3-8: Responses to questions regarding Offshore Ornithology	80
Table 3-9: Responses to questions regarding Onshore Ecology	84
Table 3-10: Responses to questions regarding Onshore and Intertidal Ornithology	100
Table 3-11: Responses to questions regarding the Fylde MCZ	117
Table 3-12: Responses to questions regarding Benthic Compensation	125

1 Applicants' Response to IP submission at Deadline 4- Natural England

1.1 Introduction

- 1.1.1.1 Following Deadline 4, Morgan Offshore Wind Limited ('Morgan OWL') and Morecambe Offshore Windfarm Limited ('Morecambe OWL'), (together, 'the Applicants') have reviewed each of the submissions received from stakeholders who registered as Interested parties (IPs) in the Examination.
- 1.1.1.2 Details of the Applicants' response to Natural England's submissions (REP4-138, REP4-139, REP4-140, REP4-141) received at Deadline 4 as set out in this annex.

2 Applicants' Response to Written Representations- Natural England

2.1 Natural England REP4-138 – Natural England (Covering Letter to Deadline 4)

Table 2.1: REP4-138 – Natural England (Covering Letter to Deadline 4)

Reference	IP submission	Applicants' response
REP4-138 138.1	<p>1. Deadline 4 Submissions</p> <p>Natural England have submitted the following documents at Deadline 4:</p> <ul style="list-style-type: none"> EN020028 518289 Morgan and Morecambe Offshore Wind Transmission Assets <ul style="list-style-type: none"> Appendix K4 – Natural England's Risk and Issues Log Deadline 4; EN020028 518289 Morgan and Morecambe Offshore Wind Transmission Assets <ul style="list-style-type: none"> Appendix G4 – Natural England's comments on the Outline Hydrogeological Risk Assessment of Lytham St Annes Dunes SSSI; and EN020028 518289 Morgan and Morecambe Offshore Wind Transmission Assets <ul style="list-style-type: none"> Appendix J4 – Natural England's comments on the Without Prejudice Benthic Compensation DCO Schedule. 	The Applicants note this response.
REP4-138 138.2	<p>2. Updates to the Risk and Issues Log at Deadline 4</p> <p>Natural England have reviewed the documents submitted by the Applicant at Deadline 3. Annex 1 lists the documents we have reviewed and for instances where we have not provided advice via an Appendix, where comments can be found in the Risk & Issues Log.</p>	The Applicants note this response and have responded in 'Natural England – APP K4 R&I log.
REP4-138 138.3	<p>3. Advice through Discretionary Advice Service (DAS)</p> <p>Natural England draws the ExA attention to the multiple DAS calls we have had with the Applicant to discuss outstanding issues and aid the Applicant in issue resolution. A summary of recent DAS engagement is provided in the relevant topic area headings below and is referenced in the R&I log (Appendix K4) to highlight the relevant issues to the Examiners.</p> <p>Given this level of non-statutory engagement, we now consider that the onus is on the Applicant to ensure our DAS advice has been reflected and incorporated into their submissions. Across all outstanding areas our headline advice to the Applicant is to fully utilise the detailed advice provided through DAS and submitted at previous deadlines to update the relevant documents and chapters, and to submit these promptly into the Examination. Natural England's preferred approach going forwards is to engage through the formal Examination process.</p>	The Applicants note this comment and thank Natural England for the DAS advice, which has been incredibly useful in identifying routes to resolving matters.
REP4-138 138.4	<p>3.1 Benthic Ecology and Physical Processes</p> <p>Natural England and the Applicant attended a meeting under DAS on 22 July 2025. During this meeting, the Applicant presented how they intend on resolving Natural England's concerns and what new information they are going to submit into Examination. Natural England provided advice on the information and the detail we require for a route to resolution. We will therefore revisit these topic areas once the Applicant has submitted the relevant information into Examination. Natural England will only review new/updated information/documents/plans submitted into Examination, we will not be engaging in rebuttal-style documents or comments on comments'. Therefore, unless new information/assessment/named plans are submitted, our original position in our Relevant Representations will largely remain unchanged.</p> <p>Additionally, we note the Applicant submitted their Without Prejudice Benthic Compensation DCO Schedule [REP3-066]. Natural England has provided comments on this in Appendix J4.</p>	<p>The Applicants note this comment. The Applicants have updated the following chapters/reports at Deadline 5 to capture the relevant information/clarifications presented in the Applicants' response to Natural England's Deadline 3 submission (REP4-100), engagement on the 22 July 2025 and all updated commitments:</p> <ul style="list-style-type: none"> Volume 1, Chapter 3: Project description (F1.3/F04) Volume 2, Chapter 1: Physical processes (F2.1./F02) Volume 2, Chapter 2: Benthic subtidal and intertidal ecology (F2.2./F02) Volume 2, Chapter 4: Marine Mammals (F2.4/F02) Volume 2, Chapter 5: Offshore Ornithology Chapter (F2.5/F02) MCZ Screening and Stage 1 Assessment Report (E4/F02) MCZ Assessment Stage 2 (MEEB) (S_D1_9/F02) HRA Stage 2 ISAA Part 3 (E2.3/F02) Review of Cumulative Effects Assessment and In-Combination Assessment (CEA Review) (S_D2_10/F02) Cumulative screening matrix and location plan (F1.5.5/F03)

Reference	IP submission	Applicants' response
		<ul style="list-style-type: none">• Outline Offshore Cable Specification and Installation Plan (CSIP) (J15/F03)• Offshore In Principle Monitoring Plan (J20/F04); and• Dredging and disposal - site characterisation plan (J22/F02) <p>The Applicants have responded to the Natural England comments on the Without prejudice benthic compensation DCO schedule in S_D3_9/F02.</p>
REP4-138 138.5	<p>3.2 Onshore Ecology</p> <p>Natural England and the Applicant attended a meeting under DAS on 12 June 2025 to discuss the Outline Hydrogeological Risk Assessment of Lytham St Annes Dunes SSSI [REP3-061] which the Applicant submitted at Deadline 3. We have provided detailed comments in Appendix G4 submitted at Deadline 4.</p>	<p>The Applicants note this comment. The Applicants have provided responses to App G4 (comments on hydrogeological risk assessment) (REP4-100) and have updated the outline hydrogeological risk assessment (where appropriate (S_D3_6) and submitted this at Deadline 5.</p>
REP4-138 138.6	<p>3.3 Intertidal and Onshore Ornithology</p> <p>Natural England and the Applicant attended a meeting under DAS on 25 July 2025 to discuss onshore ornithology matters, namely: impacts on passage waterbirds at landfall, the proposed management at Fairhaven saltmarsh, and the measures proposed to address the loss of Functionally Linked Land affected by the onshore cable route. Prior to the meeting we provided the Applicant with our late submission at Deadline 3 [AS-078] which provided advice on these matters. Following the meeting we provided further written advice on onshore ornithology. We advised the Applicant to utilise our advice given throughout Examination and DAS thus far and we will review any additional /updated documents once submitted into Examination.</p>	<p>The Applicants note this comment.</p>

2.2 Natural England REP4-141 – Appendix J4 to Natural England’s Deadline 4 Submission

Table 2-2: REP4-141- Appendix J4 England’s comments on the Applicant’s Without Prejudice Benthic Compensation DCO Schedule

Reference	Key Concern and/or Update submission	Natural England’s Advice to Resolve Issue	Applicants’ response
REP4-141 141.1	N/A	1. Major/Complex comments In formulating this advice, the following documents have been considered: [REP3-066] Without prejudice benthic compensation DCO schedule	N/A
REP4-141 141.2	N/A	1.1. Summary The Applicant submitted an MCZ Stage 2 Assessment including an In-Principle MEEB Plan At Deadline 1 [REP1–059]. Natural England subsequently provided comments on the InPrincipal MEEB proposal at Deadline 2 [REP2-062]. We note that the Applicant has submitted Schedule of Changes to the Draft Development Consent Order including Draft Deemed Marine Licences document at Deadline 3 [REP3-071]. Therefore our comments in Table 1 below relate to the wording the Applicant has provided in the Schedule of Changes to the Draft Development Consent Order including Draft Deemed Marine Licences document. We highlight to the ExA that Natural England have previously provided the Applicant with Natural England’s Suggested Benthic Compensation Wording Provided to Regulators over email on 10 February 2025, however we have referred to it in this advice letter and included it in ANNEX 1 for reference.	The Applicants have commented on the detailed points raised below.
REP4-141 141.3	Section: General point Natural England notes that these provisions are similar to those used by other projects for compensation. However, to avoid confusion we would recommend removing all reference to compensation and replacing it with reference to Measures of Equivalent Environmental Benefit (MEEB). We have provided our draft suggested Benthic compensation schedule in ANNEX 1 below for reference.	Consider replacing references to compensation.	The Applicants have updated the drafting in the Without prejudice benthic compensation DCO schedule (S_D3_9/F02) to refer to Measures of Equivalent Environmental Benefit (MEEB) to avoid any ambiguity.
REP4-141 141.4	Section: Part 1 and Part 2 Provision 3 Natural England notes the wording here which allows for use of strategic compensation provisions. We recommend this be expanded as per provision 4 in ANNEX 1. This is to provide more clarity and certainty on what is being provided.	Consider amendments as per provision 4 in ANNEX 1 below.	<p>The Applicants do not consider it necessary or desirable to make the change suggested.</p> <p>The Energy Act 2023 gives the Defra (Department for Environment, Food and Rural Affairs) Secretary of State powers to establish one or more Marine Recovery Funds (MRF). This will be brought into effect through secondary legislation under the Energy Act 2023.</p> <p>Defra consulted between 31 March – 12 May 2025 on how it is proposed the MRF will function. Defra stated an intention in the consultation document to use the responses to the consultation to finalise the design of the MRF, including how the MRF will operate and be managed, and to inform the relevant secondary legislation. The secondary legislation is still not in place.</p> <p>The Without Prejudice Benthic Compensation DCO schedule (S_D3_9/F02) needs to be cognisant of the fact that the mechanics of the MRF are emerging. The Applicants wish to avoid the risk that the drafting conflicts with or is otherwise incompatible with the final legislation and guidance for the MRF.</p> <p>This is reflected in the definition of “Marine Recovery Fund” included by the Applicants in their without prejudice drafting, which states:</p>

Reference	Key Concern and/or Update submission	Natural England's Advice to Resolve Issue	Applicants' response
			<p><i>“Marine Recovery Fund Payment” means a contribution to the Marine Recovery Fund to compensate for impacts on protected features of the Fylde MCZ, <u>the sum of which will be calculated in accordance with any guidance issued by Defra or otherwise to be agreed with the Secretary of State</u>” [emphasis added]</i></p> <p>The Applicants consider that Natural England's suggested drafting at provision 4 in ANNEX 1, includes information which is not yet certain and goes into the detail of what may be included in the MRF procedures in due course. This increases the risk of conflict between the provisions. The Applicants therefore consider the additional wording to be unnecessary and undesirable for inclusion.</p>
REP4-141 141.5	<p>Section: Part 1 and Part 2 Provision 4 (1)</p> <p>As noted above, the provisions are similar to those used in compensation provisions elsewhere. We note that often these provisions include requirements for establishing the Benthic Compensation Steering Group (BCSG). Such as agreeing terms of reference and outlined dispute resolution procedures. We would recommend these be included unless otherwise advised by DEFRA due to the preference for strategic compensation. Please see the preferred wording from our draft benthic compensation provisions in ANNEX 1 below, provision 3.</p>	Consider in consultation with DEFRA the need for a BCSG and where required changes to the provision to make the role of the BCSG clear and to provide for dispute resolution.	<p>The Applicants do not consider it necessary or desirable to make the change suggested.</p> <p>Sub-paragraphs 4(1) and 11(1) of the Without Prejudice Benthic Compensation DCO schedule (S_D3_9/F02) already establish that the undertaker will form and administer the BCSG and the Marine Management Organisation and Natural England would be members of the BCSG, should it be required. Should project-specific measures be delivered through a Benthic Implementation and Monitoring Plan (BIMP), the relevant undertaker will work with the members of the BCSG to establish a suitable form of measures. Without the support of those parties, it is considered unlikely that the Secretary of State would approve the BIMP, preventing the works within the Fylde MCZ from commencing.</p> <p>In this context, the Applicants do not consider it necessary to have a detailed process for the workings of the BCSG approved by the Secretary of State, as envisaged by Natural England provision 3.</p>
REP4-141 141.6	<p>Section: General</p> <p>Natural England notes that no provisions deal with the end of life or end of works for the MEEB provisions and would recommend wording from our draft benthic compensation provisions in ANNEX 1 below, provision 14.</p>	Consider inclusion of provisions to deal with the end of life of the project/MEEB requirements.	<p>The Applicants do not consider it necessary to include provisions to deal with the end of life of the project / MEEB requirements.</p> <p>Paragraph 14 in the ANNEX to Natural England's submission does not relate to end of life of the project / MEEB requirements. In any event, the Applicants do not consider it necessary or desirable to include an equivalent to provision 14. Under paragraphs 5 and 12 of the Without Prejudice Benthic Compensation DCO schedule (S_D3_9/F02), the relevant undertaker is required to notify the Secretary of State of implementation of the Fylde MCZ MEEB. If that is undertaken as a project-specific measure, in accordance with the approved BIMP, then the relevant undertaker has to report to the BCSG on any monitoring and implementation. This is considered a proportionate control to ensure that the MEEB is implemented and thereafter monitored and maintained as agreed.</p>

2.3 Natural England REP4-140 – Appendix G4 to Natural England’s Deadline 4 Submission

Table 2-3: REP4-140 – Appendix G4 Natural England’s comments on the Outline Hydrogeological Risk Assessment of Lytham St Annes Dunes SSSI

Reference	Key Concern and/or Update	Natural England’s Advice to resolve issue	Applicants’ response
REP4-140 140.1	N/A	<p>1. Major/Complex comments</p> <p>1.1. Summary</p> <p>Natural England attended a meeting with the Applicant on 12 June 2025 to discuss the Outline Hydrogeological Risk Assessment of Lytham St Annes Dunes SSSI and the necessary detail to be included, subsequently the Applicant submitted an Outline Hydrogeological Risk Assessment of Lytham St Annes Dunes SSSI at Deadline 3.</p> <p>Having reviewed the document, our primary concerns remain in regard to limited data/evidence/information in particular areas including (but not exclusively): the presence/location of any groundwater dependent features in the golf course, seasonal variability and the effects on the groundwater table, site specific groundwater conditions. Therefore, we would welcome further clarity on when any surveys will be undertaken, and evidence gaps addressed in order to inform cable burial depth. Our detailed advice on [REP3- 061] is included in Table 1 below.</p>	The Applicants note this response and have provided responses to Natural England’s comments below.
REP4-140 140.2	<p>Section: General [REP3-061]</p> <p>Natural England is pleased to see the Applicant’s commitment to producing and implementing a detailed Hydrogeological Risk Assessment which will be secured through Requirement 8 of the draft DCO.</p> <p>In addition, the outline Hydrogeological Risk Assessment pulls together information from a number of sources (previously presented in multiple documents for Deadline 1) and is helpful in drawing together the evidence regarding the potential groundwater pathway(s) that may exist between the landfall and key ground water dependant features of the SSSI/ LNR and BHS. The document considers dewatering during construction excavations, the construction activities themselves and the permanent presence of the cable beneath the dunes</p>	<p>Natural England advises that the outline Hydrogeological Risk Assessment should be updated with the information gained during the next stage of the assessment as outlined in Section 5. This includes incorporating data from the recently commissioned NVC survey of Lytham St Annes Dunes SSSI/ LNR and St Annes Old Links Golf Course & Blackpool South Rail Line BHS. Key information will be the confirmation of no ground water dependant features within the golf course which should be provided prior to the end of examination.</p> <p>In addition, if further information is received from the St Annes Old Links Golf Course with regards to groundwater abstraction this should also be presented and reviewed.</p>	<p>The Outline Hydrogeological Risk Assessment has been updated for Deadline 5 (S_D3_6). It includes the findings of the NVC survey for the Lytham St Annes Dunes SSSI/LNR and the Old Links Golf Club. The surveys were undertaken in July and September 2025 respectively.</p> <p>A site visit was undertaken to the Old Links Golf Club to request data regarding the groundwater abstraction. Observations from the site visit have been included in the OHyRA, however the data has not yet been received.</p>
REP4-140 140.3	<p>Section: 1.3.4.1</p> <p>Natural England notes that the report recognises data limitations including that there has not been any direct data capture related to the ground conditions of the SSSI/LNR/BHS, including the groundwater regime and its likely seasonal variability.</p> <p>In addition, there remains questions regarding combined effects of the Golf Course groundwater abstraction and the permanent presence of the cable (depending on cable burial).</p>	<p>Natural England still has concerns around seasonal variability (and extreme weather events i.e. drought brought about from future climate change) with regards to the position of the groundwater table and potential impacts on groundwater dependant features of the SSSI, LNR and BHS. Depending on cable burial depth, this is relevant to the permanent presence of the cable ducting which could be in-situ for decades. This is presently a gap in understanding which we advise should be addressed during Examination.</p>	<p>The Applicants will undertake ground investigations post consent where necessary. The scope of any such ground investigation will be agreed with the Environment Agency and Natural England. The associated monitoring will provide further site-specific data, particularly relating to the presence, depth and permanence of a shallow water table and continuity with SSSI dune slack habitats</p>
REP4-140 140.4	<p>Section: 2.5.1.1, 5.1.1.4</p> <p>Natural England advises that the depth of the groundwater table is still unclear although the report notes that it is likely to</p>	<p>Natural England advises that an additional borehole could provide more assurance on the depth below surface of the glacial till within the dune system, but depending on its location, undertaking a further borehole could impact the SSSI.</p>	<p>A scheme of groundwater monitoring will be undertaken where necessary based on the findings of the detailed Hydrological Risk Assessment, post consent and following on from detailed design. The location and scope of the monitoring will be determined by the engineering specification and design undertaken post consent as part of detailed design. The golf course</p>

Reference	Key Concern and/or Update	Natural England's Advice to resolve issue	Applicants' response
	<p>be <1m (based on observations during drilling of a borehole). The report goes on to note:</p> <p>"The presence, sensitivity and temporary or permanent impact on any water table or tables as a consequence of the project is considered to be the primary risk as this impact has the potential to adversely affect the current local hydro-ecological 'steady state' that supports both the current SSSI/LNR/BHS biodiversity as well as the golf club abstractions. Shallower water tables are considered to have a relatively higher sensitivity than deeper ones owing to their increased potential to support dune slack habitats."</p> <p>In addition, it is also unclear whether the groundwater table is laterally continuous or discontinuous across the site. Section 3.4.1.14 notes "It is uncertain whether this water table is continuous beneath the SSSI or present as a discontinuous perched water resting above lower permeability strata".</p> <p>There are also remaining questions around interactions between rainfall and groundwater, i.e., what groundwater recharge is typical following rainfall events or on a seasonal basis, and how the elevation of any water table or tables responds.</p> <p>The report under next steps suggests that further ground information may be required to establish site specific groundwater conditions. It goes on to say that this could comprise a borehole drilled to a depth of the Mercia Mudstone Formation bedrock strata (to confirm the depth of glacial clays) with a groundwater monitoring well installed at an appropriate depth.</p>	<p>Therefore, Natural England seeks further clarity on if and when data will be collected. We advise that further information is required on:</p> <ul style="list-style-type: none"> Where this borehole may be located (especially if it is within the SSSI); and Whether the groundwater monitoring well will be equipped with a datalogger that can be installed and left in-situ before, during and after construction – to provide longer term data on the position of the groundwater table and seasonal variations. <p>This data would help confirm any changes resulting in the permanently installed cable through reductions in groundwater levels due to presence of cable ducting (identified as a potential impact in Table 3-3).</p>	<p>abstraction boreholes could be used subject to initial baselining and the absence of any drawdown related to their abstraction regime.</p> <p>The installation of any new groundwater observation boreholes will also be balanced against potential impacts to the SSSI from the drilling of additional boreholes and the impact on third party land from the provision of such infrastructure.</p>
REP4-140 140.5	<p>Section: 3.1.1.2 and 3.4.2.4 and 3.4.2.7</p> <p>Natural England notes that with regard to cable installation, the cable burial depth is currently unknown (with min and max of 10-30m given). In addition, the exact cable routing whether north, south or split around the care home and under the SSSI/ LNR/ BHS is not yet known. This could influence the potential impacts and should be captured in the revised Hydrogeological Risk Assessment.</p>	<p>Natural England advises that once the cable burial depth and route is confirmed further assessment of the extent of dunes slacks that will be passed under is required and that the revised NVC survey of the SSSI/ LNR and BHS, should be used to inform this.</p>	<p>The OHyRA has been updated for Deadline 5 to include the findings of the 2025 NVC surveys at the Lytham St Annes Dunes SSSI/LNR and the Old Links Golf Club. The Applicants also propose that the NVC surveys would be repeated in the three years following construction to supplement the evidence base.</p>
REP4-140 140.6	<p>Section: 3.4.1 incl. Fig 3.1</p> <p>In regard to short term reduction in groundwater levels within the SSSI and from groundwater dependent features due to temporary dewatering of TJB excavation, our main concern is keeping the predicted Zone of Influence (Zol) well away from the SSSI boundary.</p> <p>Natural England believes that the methodology for defining the Zol for the TJB dewatering seems sensible, as the Applicant has been cautious in their estimations on many levels (using 6m as a drawdown depth, which is the WCS as 6m has been given as the maximum excavation depth; doubling the initial zone of influence to allow a factor of safety; using different methods to cross-check whether the Zol is appropriate; and not taking into account natural recharge).</p> <p>However, we note that the dewatering Zol doesn't consider other abstractions, which on the one hand could be considered to obstruct the assessment of in-combination effect. But we note that the significant amount of buffering within the TJB Zol</p>	<p>Natural England will provide further advice on the extent of Zol following the final cable burial/ TJB design and in light of any additional data collected as outlined in the next steps (section 5).</p>	<p>Noted.</p>

Reference	Key Concern and/or Update	Natural England's Advice to resolve issue	Applicants' response
	could be sufficient to 'cover off' any potential in-combination effects.		
REP4-140 140.7	Section: 3.4.2.4 and Table 3-3 Natural England advises that the secondary mitigation of ensuring the cable is located within glacial clays is essential. This would hopefully bypass any other lasting impacts on groundwater from the cable. The boreholes seaward and landward of the dune system agree that glacial clays/till is encountered at 14.4m (CP+RC) and 14.5m (MORGAN_A2_CP01B). Based on this data, a commitment to set the minimum cable depth at >15m (rather than 10m) would fully mitigate our concerns and would hopefully avoid the middle sands too, which form an important part of the aquifer.	Natural England advises that the Applicant should ensure the cable burial depth is sufficient to be located in the low permeability glacial clays. This should be secured in the project commitment log.	The Applicants are unable to commit at this stage to increasing the minimum drill depth beneath the Dunes SSSI. Final depths will be determined once contractors are appointed and the detailed design is undertaken. Additional hydrogeological data will be collected, including information on groundwater abstractions from the St Annes Old Links Golf Course, as well as further ground investigation and ground water monitoring as necessary. This information will inform the detailed Hydrogeological Risk Assessment, which will in turn inform the final cable positioning and depths.
REP4-140 140.8	Section: 3.4.2.6 Natural England notes that the report mentions the use of Direct Pipe drilling techniques – which would limit the use of drilling fluid. However, In previous documents HDD has been mentioned	Please can the Applicant confirm that Direct Pipe drilling has been agreed and finalised for the cable installation method.	As noted in section 3.14.3 of Volume 1, Chapter 3: Project description (REP2-008), the offshore export cables between the TJB working area (work nos 10A/10B) and Lytham St Annes beach will be installed using the direct pipe trenchless technique.
REP4-140 140.9	Section: Table 3-2 The secondary mitigation measures to reduce the short-term reduction of groundwater levels due to temporary dewatering of TJB excavation is welcomed i.e.: <ul style="list-style-type: none"> • Potential for returning abstracted clean groundwater to ground as infiltration • Possible use of shuttered sheet piling to limit groundwater ingress • Undertaking works during periods of reduced sensitivity, i.e. when water tables (where present) are lowest 	Natural England seeks clarity on how the Applicant will secure this mitigation, i.e. included in the project commitment log. Natural England advises that any return of water would need to make sure that it is not polluted. And the periods of reduced sensitivity would need defining, e.g. avoiding prolonged wet weather/ construction during the summer month. But we highlight that this will need to be checked against any bird sensitivities.	Pollution prevention measures are set out in the Outline Pollution Prevention Plan (REP4-034) which is an appendix to J1 Outline Code of Construction Practice (REP4-026) and secured by Requirement 8, Schedules 2A & 2B of the draft Development Consent Order (REP4-007). Construction management measures to mitigate temporary impacts of dewatering will be implemented in accordance with the Outline Landfall Construction Method Statement (S_D4_22).

3 **Response to Natural England’s Risk and Issues Log (REP4-139)**

3.1.1.1 The Applicants’ comments on Natural England’s (NE) Risk and Issue Log are presented in Table 3-2 to Table 3-12.

Table 3-1: NE’s Risks and Issues Log colour coding

Description	Colour
<p>Purple Note for Examiners and/or competent authority. May relate to DCO/DML</p>	
<p>Red Natural England considers that unless these issues are resolved it will have to advise that (in relation to any one of them, and as appropriate) it is not possible to ascertain beyond reasonable scientific doubt that the project will not affect the integrity of an SAC/SPA/Ramsar and/or significantly hinder the conservation objectives of an MCZ and/or damage or destroy the interest features of a SSSI and/or comply fully with the Environmental Impact Assessment requirements.</p> <p>Addressing these concerns <u>may</u> require the following:</p> <ul style="list-style-type: none">• new baseline or survey data; and/or• significant revisions to baseline characterisation and/or impact modelling and/or• significant design changes; and/or• significant mitigation <p>In addition, Natural England may use this category to highlight where there is a significant risk that an issue will not be sufficiently addressed within the Examination timescales. Consequently, issues that start out as Amber may progress to Red in the latter stages of the examination.</p>	
<p>Amber Natural England does not agree with the applicant’s position or approach and consider that this could make a material difference to the outcome of the decision-making process for this project.</p> <p>Natural England considers that these matters <u>may</u> be resolved through:</p> <ul style="list-style-type: none">• provision of additional evidence or justification to support conclusions; and/or• revisions to impact assessment methodology and/or assessment conclusions; and/or• minor to moderate revisions to impact modelling; and/or• well-designed mitigation measures that are adequately secured through the draft DCO/dML and/or• amendments to draft plans <p>If these issues are not addressed or are unlikely to be resolved by the end of the Examination, then they may become a Red risk as set out above.</p>	
<p>Yellow Natural England doesn’t agree with the Applicant’s position or approach. We would ideally have liked this to be addressed but are satisfied that for this particular project it is unlikely to make a material difference to our advice or the outcome of the decision-making process and would not expect these matters to be an ongoing focus of the examination. However, we reserve the right to revise our opinion should further evidence be presented.</p> <p>It should be noted by interested parties that just because these issues/comments are not raised as significant concerns in this instance, it should not be understood or inferred that Natural England would be of the same view in other cases or circumstances.</p> <p>Once a Risk or Issue has been categorised as yellow, Natural England will not make further comment on the matter at subsequent deadlines, unless specifically requested to through ExA Questions. These rows will then be hidden at subsequent deadlines in order to rationalise the risk and issues log.</p>	

Description	Colour
<p>Green</p> <p>Natural England is in broad agreement with the Applicant's approach and has no significant outstanding concerns. As above, we reserve the right to revise our opinion should new evidence be presented.</p> <p>Once a Risk or Issue has been categorised as green, Natural England will not make further comment on the matter at subsequent deadlines, unless specifically requested to through ExA Questions. These rows will then be hidden at subsequent deadlines in order to rationalise the risk and issues log.</p>	

3.2 Principal Areas of Disagreement Summary Statement (PADSS)

Table 3-2: Responses to Principal Areas of Disagreement Summary Statement (PADSS)

ID	Risk and Issue Log comment	NE Rel Rep RAG rating and D1	Applicants' comment at Deadline 4 (in response to NE D3 submission)	Natural England's Comments/Update on Progression at Deadline 4	RAG D4	Applicants' comment at Deadline 5 (in response to NE D4 submission)
Taken from NE's Relevant and Written Representations						
Morgan and Morecambe Transmission Assets - Principal Areas of Disagreement Summary Statement (PADSS)						
NE1	<p><u>Development Consent Order (DCO and deemed Marine Licence (dML)</u></p> <p>Definition of commence with respect to the offshore works.</p> <p>This definition is linked directly to the definition of offshore preparation works and excludes the works detailed under offshore preparation from the definition of commence. We would note that this definition of commence is different to those used and accepted under a wide number of consented offshore wind projects.</p> <p>The definition of commence and offshore preparations works within the DCO and all three DMLs must be amended.</p> <p>It is possible this issue could be progressed following amendments requested.</p>		The Applicants welcome resolution of this point at Deadline 3.	No further update due to resolution at D3.		N/A
NE2	<p>Duration of submitting pre-construction plans before construction begins.</p> <p>Due to the increasing complexity of construction of large offshore works, the proposed four month consultation period is no longer appropriate.</p> <p>The Applicant should amend the dMLs to allow for documents to be submitted at least six months prior to commencement.</p> <p>It is possible this issue could be progressed following amendments requested.</p>		The Applicants welcome resolution of this point at Deadline 3.	No further update due to resolution at D3.		N/A
NE3	<p><u>Benthic Ecology and Physical Processes</u></p> <p>Worst Case Scenario (WCS) during construction, operation and maintenance.</p> <p>Natural England advise that there are a number of potential impacts both on benthic ecology and physical processes which have not been adequately considered or assessed within the Environmental Statement (ES).</p> <p>Natural England advises that the ES and where relevant, Marine Conservation Zone (MCZ) assessment, are updated to consider all potential pathways of effect on intertidal and subtidal benthic habitats.</p> <p>It is possible this issue could be progressed if the Applicant follows SNCB advice.</p>		The Applicants' position remains as outlined in RR-1601.C.1 of their response to Natural England (PDA-017) that all of the relevant potential impact pathways on intertidal and subtidal benthic habitats have been identified and the MDS has been defined as appropriate to each potential impact, activity and receptor. The identified impacts are assessed in Volume 2, Chapter 2: Benthic subtidal and intertidal ecology (APP-045) and in the Marine Conservation Zone Screening and Stage 1 Assessment Report (APP-019) with further details on construction scenarios provided in the Rule 9 – ES assessment of Construction Scenarios (AS-070). The MDS for most impacts to benthic ecology (except those drawing on the physical processes assessments) are for the sequential construction scenario. The MDS for physical processes is concurrent	No change.		The Applicants have updated Volume 2, Chapter 2: Benthic subtidal and intertidal ecology (F2.2/F02) and the MCZ Screening and Stage 1 Assessment Report (E4/F02) at Deadline 5 to include all additional clarifications / justifications provided in submissions at previous deadlines to address Natural England's comments relating to the MDS.

ID	Risk and Issue Log comment	NE Rel Rep RAG rating and D1	Applicants' comment at Deadline 4 (in response to NE D3 submission)	Natural England's Comments/Update on Progression at Deadline 4	RAG D4	Applicants' comment at Deadline 5 (in response to NE D4 submission)
Taken from NE's Relevant and Written Representations						
Morgan and Morecambe Transmission Assets - Principal Areas of Disagreement Summary Statement (PADSS)						
			<p>construction as recovery between phases is beneficial for coastal processes.</p> <p>The Applicants have also provided detailed responses in the Applicants' response to Natural England's response to ExQ1 against ExQ1 7.1.4 and 7.1.6, which have been incorporated, where appropriate, in this response.</p> <p>The Applicants have provided responses to RI_B5, and RI_B8 to RI_B11 with respect to the MDS and scope of assessments relating to physical processes. The Applicants will update Volume 2, Chapter 1: Physical Processes (APP-042) for submission at Deadline 5 to include all additional clarifications/justifications provided in submissions at previous deadlines to address Natural England's comments relating to these matters.</p> <p>The Applicants also highlight their responses to comments RI_C7, RI_C8, RI_C10, RI_C11, RI_C13, RI_C14, RI_C15, RI_C16, RI_C17, RI_C18, RI_C19, RI_C20 and RI_C21, which address NE's points regarding the benthic subtidal and intertidal ecology maximum design scenario (MDS) and conclude that the assessments conducted have adequately considered the potential impact of the Transmission Assets on this receptor group.</p> <p>The Applicants will update Volume 2, Chapter 2: Benthic subtidal and intertidal ecology (APP-045) and the MCZ Screening and Stage 1 Assessment Report (APP-019) for submission at Deadline 5 to include all additional clarifications/justifications provided in submissions at previous deadlines to address Natural England's comments relating to the MDS.</p>			
NE4	<p>Removal of infrastructure at the decommissioning stage.</p> <p>Natural England is concerned that there is currently no commitment to the removal of cable/scour protection at end of project life.</p> <p>Natural England advise that the Applicant should include a commitment to remove cable/scour protection at end of project life and this should be secured within the DCO.</p> <p>It is possible this issue could be progressed if the Applicant follows SNCB advice.</p>		The Applicants note Natural England's approval of the removal of 'rock dump' as a cable protection option in the Outline CSIP (REP2-022) and Project Description (REP2-008) as set out in the Natural England response to ExQ1 (REP3-095) question 7.1.5. With regard to Natural England's request that as a minimum, they would expect to see an update to the draft DCO to	No change.		As per the Applicants' response to Natural England's Deadline 3 submission (REP4-100), the Applicants and Natural England met on 22 July 2025 to review the PADSS and Risks and Issues log with respect to offshore matters, which allowed the Applicants to clarify their position regarding the removal of cable protection/scour protection from the Fylde MCZ at

ID	Risk and Issue Log comment	NE Rel Rep RAG rating and D1	Applicants' comment at Deadline 4 (in response to NE D3 submission)	Natural England's Comments/Update on Progression at Deadline 4	RAG D4	Applicants' comment at Deadline 5 (in response to NE D4 submission)
Taken from NE's Relevant and Written Representations						
Morgan and Morecambe Transmission Assets - Principal Areas of Disagreement Summary Statement (PADSS)						
			<p>prohibit rock dump in the Fylde MCZ (response to question 7.1.5 in REP3-095), the Applicants have updated the draft DCO submitted at Deadline 4 (C1/F06) to include no 'rock dump' in Condition 18(e) of Schedule 14 and 15 to align with the commitment already made in the Outline CSIP (REP2-022).</p> <p>Regarding the requested commitment to decommission all infrastructure and cable protection (with the exception of cable crossings) within the Fylde MCZ, the Applicants responded previously to this point within RR-1601.42 of their response to Natural England (PDA-014). As detailed in the Outline CSIP (REP2-022), the Transmission Assets design is considering multiple cable protection options. The Outline CSIP (REP2-022) identifies that cable burial is the preferred option for cable protection where practicable (CoT54) and should cable protection be required within the Fylde MCZ, it will be designed to be removable (CoT108) with the requirement for removal agreed with stakeholders and regulators at the time of decommissioning (CoT109). However, the MDS for permanent habitat loss in the decommissioning phase is for all infrastructure (scour protection, cable protection, cables and cable crossings) to be left <i>in situ</i>, so the worst case has been assessed in section 2.11.5 of Volume 2, Chapter 2: Benthic subtidal and intertidal ecology (APP-045).</p> <p>The Applicants will also update Volume 2, Chapter 2: Benthic subtidal and intertidal ecology (APP-045) and the MCZ Screening and Stage 1 Assessment Report (APP-019) for submission at Deadline 5 to include all these updated commitments.</p> <p>The use of cable/scour protection, where required, will be evaluated and further considered post-consent in Detailed CSIPs, focusing on both engineering suitability and environmental recoverability. The CSIPs are part of the Offshore Construction Method Statements that are secured in the Draft DCO (AS-004) in:</p>			decommissioning during the issue specific hearing on 30 th July 2025. It was noted that the Applicants and Natural England are not agreed on this matter.

ID	Risk and Issue Log comment	NE Rel Rep RAG rating and D1	Applicants' comment at Deadline 4 (in response to NE D3 submission)	Natural England's Comments/Update on Progression at Deadline 4	RAG D4	Applicants' comment at Deadline 5 (in response to NE D4 submission)
Taken from NE's Relevant and Written Representations						
Morgan and Morecambe Transmission Assets - Principal Areas of Disagreement Summary Statement (PADSS)						
			<ul style="list-style-type: none"> Condition 18(1)(e)(i) of Schedule 14 for the Morgan Offshore Wind Project: Transmission Assets; and Condition 18(1)(e)(i) of Schedule 15 for the Morecambe Offshore Windfarm: Transmission Assets. <p>The Applicants will submit a draft decommissioning programme to the Secretary of State for approval as required by the Energy Act 2004 prior to the commencement of construction . This is standard practice for offshore wind development and the decommissioning programme will be updated throughout the assets' lifespan to incorporate changing best practice and new technologies. Offshore decommissioning is secured under Requirement 21 of Schedule 2A and Schedule 2B of the draft DCO (AS-004).</p> <p>The Applicants position is aligned with that of the Morgan Generation Assets and Morecambe Generation Assets DCO applications and the recently made Orders for the Mona Offshore Wind Project and Sheringham and Dudgeon Extension Projects, the latter of which also has an export cable corridor overlapping an MCZ.</p> <p>The Applicants and Natural England met on 22 July 2025 to review the PADSS and Risks and Issues log with respect to offshore matters, which allowed the Applicants to clarify their position regarding the removal of cable protection/scour protection from the Fylde MCZ at decommissioning during the issue specific hearing on 30th July 2025. It was noted that the Applicants and Natural England are not agreed on this matter.</p>			
NE5	<p>Lack of cable protection location and design information.</p> <p>There is currently insufficient information on the anticipated location, extent and design of cable protection measures placed along the Export Cable Corridor (ECC). Therefore, we are unable to fully understand the potential impacts of cable protection on sediment transport pathways, particularly within Fylde MCZ.</p> <p>Natural England advise that where possible, further information is provided on the anticipated location, extent and design of cable protection measures. Potential resolution.</p>		<p>The Applicants' position remains as outlined in response to comment RR.1601.43 on the location and design of cable protection (PDA-014). Details of cable protection material and volumes for the Transmission Assets are provided in sections 3.12.6 of Volume 1, Chapter 3: Project description (REP2-008) with further details provided in the Outline Cable Specification and Installation Plan (CSIP)</p>	No change.		<p>The Applicants' position remains as outlined in response to comment RR.1601.43 on the location and design of cable protection (PDA-014).</p> <p>The Applicants have updated the following chapters/reports at Deadline 5 to capture the relevant information/clarifications presented in the Applicants' response to Natural England's Deadline 3 submission (REP4-100) (particularly, the Applicants</p>

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Taken from NE’s Relevant and Written Representations						
Morgan and Morecambe Transmission Assets - Principal Areas of Disagreement Summary Statement (PADSS)						
	This is subject to the Applicant providing further information on cable protection location and design.		<p>(APP-220). These detail a Maximum Design Scenario (MDS) for:</p> <ul style="list-style-type: none">up to 51 crossings (Table 3.8 in Volume 1, Chapter 3: Project description (REP2-008));the location of crossings are shown in Volume 1, Annex 3.1: Offshore Crossing Schedule ((APP-025);requirements for cable protection due to ground conditions (Table 3.7 in Volume 1, Chapter 3: Project description (REP2-008)); andWithin the Fylde MCZ, there are up to 4 cable crossings (up to 4,000 m² of cable protection) and a 3% cable protection contingency for ground conditions (26,400 m² of cable protection) as detailed in section 7.2 and section 7.3 in the Outline CSIP (APP-220)). <p>The use of cable protection for ground conditions, where required, will be further evaluated and considered post-consent in the CSIPs, following further post-consent and pre-construction surveys, secured as part of the Construction Method Statements. The Offshore Construction Method Statements are secured in the Draft DCO (AS-004) in:</p> <ul style="list-style-type: none">Condition 18(1)(e) of Schedule 14 for the Morgan Offshore Wind Project: Transmission Assets; andCondition 18(1)(e) of Schedule 15 for the Morecambe Offshore Windfarm: Transmission Assets. <p>As outlined in Volume 2, Chapter 1: Physical Processes (APP-042) and Chapter 2: Benthic subtidal ecology (APP-045), the physical process and benthic ecology assessments have been undertaken on the MDS as presented within Volume 1, Chapter 3: Project description (REP2-008) with the assessment of the associated impacts for sediment transport pathways identified as being of negligible to minor adverse significance, which is not significant in EIA terms. The Applicants will update Volume 2, Chapter 1: Physical</p>			<p>response to Natural England's response to ExQ1 questions 7.1.4 - 7.1.6 and the Applicants response to Annex C2 (REP3-092)) and all updated commitments:</p> <ul style="list-style-type: none">Volume 2, Chapter 2: Benthic subtidal and intertidal ecology (F2.2/F02);Volume 2, Chapter 1: Physical processes (F2.1/F02)MCZ Screening and Stage 1 Assessment Report (E4/F02); andStage 2 MCZ Assessment, including a without prejudice, in-principle Measures of Equivalent Environmental Benefit (MEEB) Plan (S_D1_9/F02).

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Taken from NE's Relevant and Written Representations						
Morgan and Morecambe Transmission Assets - Principal Areas of Disagreement Summary Statement (PADSS)						
			<p>Processes (APP-042) Chapter to capture the related information contained within the outline CSIP (APP-220) and CBRA (APP-219) to address Natural England comments. As agreed with NE this will be submitted at Deadline 5.</p> <p>As outlined in the Applicants' response to RR.1601.43 (PDA-014), the Applicants consider that a precautionary but realistic approach has been adopted for the MCZ Screening and Stage 1 Assessment Report (APP-019). The approach assumes that all of the long-term habitat loss associated with cable protection for ground conditions may occur within either the subtidal mud or subtidal sand feature. As outlined in the Outline Offshore Cable Specification and Installation Plan (CSIP) (APP-220) as part of the detailed design process pre-construction survey data will be used to inform the final routing of the cable, any micro-siting requirements and areas where there is a higher risk of remedial works such as external cable protection. The Applicants would highlight that a new commitment has also been added to the updated Commitments Register submitted at Deadline 4 (F1.5.3/F05) as CoT134 which states that "<i>As part of the detailed design process, micro-siting of the offshore export cables within the offshore export cable corridors will be considered where successful burial could pose a challenge or where a higher risk of remedial works such as external cable protection may be required.</i>" At this stage in the consenting process, however, the Applicants are unable to refine these assumptions further. Following detailed design post-consent, the exact compensation requirements may be refined, in consultation with stakeholders, which would then inform MEEB compensation figures if it is deemed to be required by the Secretary of State.</p> <p>With regards to the cable protection required in the Fylde MCZ for the cable crossing, the Applicants provided a Stage 2 MCZ Assessment, including a without prejudice, in-principle Measures of Equivalent Environmental Benefit (MEEB)</p>			

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Taken from NE's Relevant and Written Representations						
Morgan and Morecambe Transmission Assets - Principal Areas of Disagreement Summary Statement (PADSS)						
			<p>Plan, at Deadline 1 (REP1-059) which updated the MDS for long term habitat loss of each of the features to account for the cable crossing occurring only within the subtidal mud feature. The Applicants will update the MCZ Screening and Stage 1 Assessment Report (APP-019) for submission at Deadline 5 to include the update to the MDS for the subtidal mud feature and all relevant new commitments for the Fylde MCZ.</p> <p>Furthermore the following new commitments have been made at Deadline 4:</p> <ul style="list-style-type: none"> A commitment that no cable/scour protection shall be permanently deployed in the intertidal between MLWS and MHWS (CoT133) (updated Commitments Register submitted at Deadline 4 (F1.5.3/F05)). A commitment to benthic community recovery specific monitoring in the Fylde MCZ through pre and post construction benthic community sampling to monitor for temporal and spatial recovery (Offshore IPMP at Deadline 4 (J20/F03)). In addition, the updated IPMP includes monitoring of the potential colonisation by Invasive Non-Native Species (INNS) following construction activities within the Fylde MCZ. <p>Commitment to limit the development of cable/scour protection in the O&M phase to the first ten years / limit of the MDS (whichever is first) outside the Fylde MCZ and the first two years inside the MCZ. Additionally, at Deadline 4 the Applicants have submitted the ABPmer report (Annex to Applicants response to MMO and NE submission at Deadline 3: Assessment of Seabed Level Vertical Variability for Morgan Offshore Wind Farm - Appendix C) regarding the beach levels that underpin the assessment of the intertidal bed level trends (S_D4_19)The Applicants response to Natural England's response to ExQ1 submitted at Deadline 4 (S_D4_2.6), specifically the Applicants response to</p>			

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Taken from NE's Relevant and Written Representations						
Morgan and Morecambe Transmission Assets - Principal Areas of Disagreement Summary Statement (PADSS)						
			question 7.1.6 is also particularly relevant to this matter and provides additional clarification in respect of the points made by Natural England.			
NE6	<p>Mitigation measures for Section 41 Natural Environment and Rural Communities (NERC) Act 2006 Habitats.</p> <p>Natural England notes that no further mitigation in relation to physical processes or benthic receptors has been proposed. Additionally, there is no consideration for relevant NERC habitats.</p> <p>Natural England advises that impacts to priority habitats listed under Section 41 of the NERC Act (2006) are avoided and due consideration is demonstrated. We advise that relevant Application documents should be updated accordingly, and this is secured within the DCO/DMLs.</p> <p>It is possible this issue could be progressed if the Applicant follows SNCB advice.</p>		<p>The Applicants have responded previously to the points raised by Natural England within RR-1601.44 of their response to Natural England (PDA-014) and RR-1601.C.4 of their response to Natural England – Appendix C (PDA-017).</p> <p>During a meeting between the Applicants and Natural England on 22 July 2025, this matter was discussed, where the Applicants explained their position that a commitment to avoid the most sensitive and or priority habitats designated under Section 41 of the NERC Act 2006 was not justified or required due to the Applicants having taken all reasonable measures (via project design changes and commitments) to minimise impacts to all benthic habitats, including habitats of principal importance. Natural England requested the Applicants to set out their case clearly demonstrating how the mitigation hierarchy has been applied and the commitments made, which the Applicants have set out below.</p> <p>Avoid The avoid principle (i.e. the first step in the mitigation hierarchy) was first applied through the Offshore Export Cable Corridor routing exercise which sought to identify the shortest route from the Agreement for Lease areas to the selected landfall location at Lytham St Annes, whilst avoiding environmental sensitivities, such as MCZs and SACs, as well as third-party/existing seabed users. The Offshore Export Cable Corridor routing exercise was driven by consideration of the guiding principles described in Volume 1, Chapter 4: Site Selection and Consideration of Alternatives of the ES (APP-030) and The Crown Estate (TCE) Cable Route Protocol (TCE, 2021). The Offshore Export Cable Corridor search area was defined to minimise interaction with any designated sites, avoiding the Shell Flat and Lune Deep SAC and the West of Walney MCZ and West of Copeland MZC to the north. The Fylde</p>	<p>Natural England welcomes the updated wording for micro-siting in the DCO under Schedules 14 and 15. However, we maintain that where it is not possible to avoid broadscale NERC habitats, the Applicant will need to demonstrate that impacts have been minimised as much as possible.</p>		<p>The Applicants' have demonstrated how impacts have been minimised as much as possible within RR-1601.44 of their response to Natural England (PDA-014), and RR-1601.C.4 of their response to Natural England – Appendix C (PDA-017).</p> <p>The Applicants also set this out in full in their response to NE6 in the Applicants' response to Natural England's Deadline 3 submission (REP4-100) and specifically in the Applicants response to Natural England's response to ExQ1 questions 7.1.7 including all new commitments made at Deadline 4.</p> <p>Volume 2, Chapter 2: Benthic subtidal and intertidal ecology (F2.2/F02) and Volume 1, Chapter 1: Physical processes (F2.1/F02) have been updated at Deadline 5 to include all additional clarifications/justifications provided in submissions at previous deadlines to address Natural England's comments including the new commitments made at Deadline 4.</p>

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Taken from NE's Relevant and Written Representations						
Morgan and Morecambe Transmission Assets - Principal Areas of Disagreement Summary Statement (PADSS)						
			<p>MCZ could not, however, be avoided entirely due to its north-south extent between the Generation Assets and the point of interconnection at Penwortham. Routing around the Fylde MCZ to reach landfall location at Lytham St Anne's was not feasible due to the existing cables that run east/west through the MCZ which would need to be crossed in the shallow waters between the east edge of the MCZ and the coast.</p> <p>Reduce / minimise The reduce/minimise principle (i.e. the second step on the mitigation hierarchy) was then applied. As outlined in Volume 1, Chapter 4: Site Selection and Consideration of Alternatives of the ES (APP-030), the final offshore export cable route was designed to cross the Fylde MCZ at its the narrow (i.e. to reduce impacts). Refinements were also made to the project description (Volume 1, Chapter 3: Project description of the ES (REP2-008) post-PEIR to significantly reduce the extent of long term habitat loss and temporary habitat disturbance within the Fylde MCZ as follows.</p> <ul style="list-style-type: none"> • Post-PEIR, the MDS for cable protection outside the Fylde MCZ required for ground conditions was reduced from 20% to 10% for the Morgan offshore export cables and from 15% to 10% for the Morecambe offshore export cables. • Post-PEIR, the MDS for cable protection in the Fylde MCZ required for ground conditions was reduced from 20% to 3% contingency for the Morgan offshore export cables and from 15% to 3% contingency for the Morecambe offshore export cables. • Post-PEIR, the proportion of cables outside the Fylde MCZ requiring sandwave clearance was reduced from 60% to 9% for the Morgan offshore export cables and 30% to 9% for the Morecambe offshore export cables. • Post-PEIR, the proportion of cables within the Fylde MCZ requiring sandwave clearance was reduced from 60% to 5% for the Morgan offshore 			

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Morgan and Morecambe Transmission Assets - Principal Areas of Disagreement Summary Statement (PADSS)						
			<p>export cables and 30% to 5% for the Morecambe offshore export cables.</p> <ul style="list-style-type: none"> • Post-PEIR the width of disturbance associated with sandwave clearance was reduced from 104 m to 60 m for the Morgan offshore export cables and from 104 m to 48 m for the Morecambe offshore export cables. • Post-PEIR the width of disturbance associated with boulder clearance for the Morecambe offshore export cables was reduced from 25 m to 20 m. • Post-PEIR the offshore substation platforms (OSPs) and interconnector cables were removed from the project design. • Post-PEIR, the requirement for a Morgan Offshore Booster Station was removed from the project design. • Post-PEIR the MDS for the total length of offshore export cables within the Fylde MCZ has reduced from 94.8 km to 88 km (i.e. 16 km for each of the four Morgan offshore export cables and 12 km for each of the two Morecambe offshore export cables) as a result of further design and route identification. • Post-PEIR the MDS for the volume of spoil arising from sandwave clearance within the Fylde MCZ has reduced from 1,268,642 m³ (previously calculated as a proportion of the overall spoil generated for the Transmission Assets) to 270,000 m³. <p>The offshore export cable route was designed to minimise the number of crossings with existing cables, and therefore long term habitat loss, within the Fylde MCZ. The Applicants attempted to move the crossings outwith the Fylde MCZ however they were limited by existing infrastructure (i.e. Hibernia Atlantic telecoms cable which runs north west/south east to the west of the Transmission Assets just outside of the Fylde MCZ) and engineering constraints (e.g. the need to cross the Lanis 1 and Havhingsten telecoms cable at a 90 degree angle). As</p>			

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Morgan and Morecambe Transmission Assets - Principal Areas of Disagreement Summary Statement (PADSS)						
			<p>such, whilst the Morecambe offshore export cable crossings were able to be pushed westward beyond the boundary of the MCZ (i.e. no cable crossings are required for the Morecambe offshore export cables within the Fylde MCZ), the Morgan offshore export cables would need to cross the Lanis 1 cable within the Fylde MCZ. Therefore, the Applicants have sought to reduce the parameters of the crossing, such as length which was reduced from 20% to 3% contingency for the Morgan offshore export cables and from 15% to 3% contingency for the Morecambe offshore export cables to minimise its impact.</p> <p>In addition to changes made to the project design (embedded mitigation) to minimise impacts, the Applicants have also committed to a number of measures to further reduce impacts to benthic habitats, including NERC priority habitats, as follows:</p> <ul style="list-style-type: none"> • CoT45: ensure that no more than 5% reduction in water depth (referenced to Chart Datum) will occur at any point on the offshore export cable corridor route without prior written approval from the licensing authority. • CoT47: limits the extent of cable protection to 3% of the offshore export cable route within the Fylde MCZ (excluding cable crossings) and sandwave clearance up to 5% of the offshore export cable route within the Fylde MCZ. Material arising from sandwave clearance in the Fylde MCZ will be deposited within the Fylde MCZ. • CoT108: commits the Applicants to ensuring cable protection installed in the Fylde MCZ is designed to be removable • CoT109: outlines the requirement for removal in the Fylde MCZ to be agreed with stakeholders and regulators at the time of decommissioning. • CoT114: requires that all permanent infrastructure located between MLWS and MHWS will be buried to a target depth of 3 m. 			

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			<ul style="list-style-type: none"> CoT116: ensures that material arising from sandwave clearance will be deposited in close proximity to the works. CoT117: No walking jack-ups within the Fylde MCZ. <p>Additionally, the following new commitments have been made at Deadline 4:</p> <ul style="list-style-type: none"> The draft DCO (C1/F06) has been updated to include <i>'no rock dumping within Fylde MCZ'</i> under condition 18(e) of Schedule 14 and 15. Secured commitment (in the Commitments Register) that <i>"No cable/scour protection shall be permanently deployed in the intertidal area between Mean Low Water Springs (MLWS) and Mean High Water Springs (MHWS)." (see CoT133, F1.5.3/F05).</i> Secured commitment (in the Commitments Register) that <i>"As part of the detailed design process, micro-siting of the offshore export cables within the offshore export cable corridors will be considered where successful burial could pose a challenge or where a higher risk of remedial works such as external cable protection may be required."</i> (see CoT134, F1.5.3/F05). <p>All benthic IEFs, including those identified as habitats of principal importance in England listed under Section 41 of the NERC Act 2006, have been fully assessed in relation to the impacts of the Transmission Assets in section 2.11 of Volume 2, Chapter 2: Benthic subtidal and intertidal ecology (APP-045). This assessment concluded that all benthic subtidal IEFs will recover following construction activities. Having incorporated the embedded mitigation and commitments, together with the predicted recovery of the benthic subtidal IEFs, the benthic ecology assessment presented in Volume 2, Chapter 2: Benthic subtidal and intertidal ecology (APP-045) and the physical processes assessment presented in</p>			

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			Volume 2, Chapter 1: Physical processes (APP-042) concluded no likely significant impacts. The Applicants consider that they have taken all reasonable measures (via project design changes and commitments) to minimise impacts to all benthic habitats, including habitats of principal importance in England listed under Section 41 of the NERC Act 2006. The Applicants do not, therefore, consider that further mitigation to avoid these habitats is justified or required. Further, the Applicants do not consider that there is precedent in the offshore wind industry, or other offshore industries, for avoiding the sedimentary habitats recorded within the Transmission Assets and neither would it possible to do so given their widespread distribution within the benthic subtidal and intertidal ecology study area. The Applicants also highlight that biogenic or geogenic reef features were not identified as present within the site-specific surveys (section 2.6.3, Volume 2, Chapter 2: Benthic subtidal and intertidal ecology (APP-045)). As agreed with NE, Volume 2, Chapter 2: Benthic subtidal and intertidal ecology (APP-045) and Volume 1, Chapter 1: Physical Processes (APP-042) will be updated to include the new commitments made at Deadline 4 and set out above.			
NE7	Lasting habitat loss/change from the placement of cable protection. Natural England disagrees with the Applicant that 3.04ha of lasting habitat change/loss of subtidal sand and subtidal mud interest features from Fylde MCZ from the placement of cable protection will maintain the conservation objectives of the site. We advise that the Project is likely to cause lasting impacts on benthic features within Fylde MCZ. Every effort should be made to reduce impacts through the adoption of robust mitigation measures.		The Applicants welcome the confirmation this issue is resolved at Deadline 3.	No further update due to resolution at D3.		N/A
NE8	<u>Fish and Shellfish Ecology</u> Long term loss of supporting habitat and potential loss of prey species (sandeel). Dynamics between predator prey relationships for piscivorous birds and sand eel could be impacted due to loss of prey species.		The Applicants welcome the comments from Natural England and have agreed to make the necessary edits to the Information to Support an Appropriate Assessment Part Three – Special Protection Areas (SPA) and Ramsar Site assessments (APP-017) for Deadline 5.	No change - we look forward to sight of updated documents.		The Applicants have updated the HRA Stage 2 ISAA Part 3 (E2.3/F02) and submitted the revised version at Deadline 5.

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	Natural England advise that the loss of prey species (sandeel) due to long term habitat loss (from scour/cable protection) of supporting habitat should be assessed and updated in the final ES chapter. It is possible this issue could be progressed with further provision of information.					
NE9	Ribble Estuary MCZ assessment. Natural England do not agree that smelt should be screened out, further assessment is required as the activity may be capable of affecting the protected feature of the MCZ. There is potential for electro-magnetic field (EMF) to cause barrier effects that hinder smelt movements in and out of the estuary. Complete an assessment on potential EMF impacts.		The Applicants acknowledge the uncertainties associated with electromagnetic field impacts on fish behaviour, including smelt. However, little uncertainty exists concerning the physical dissipation of EMFs with increasing distance from the cable, as set out in section 3.11.7 of Volume 2, Chapter 3: Fish and shellfish ecology (APP-048). As the cables under the Ribble Estuary will be buried to depths of 7-45 m, there will be no detectable EMF emissions into the Ribble Estuary (beyond natural background levels). Therefore, any proposed monitoring of EMFs would not be proportionate to the negligible risk of EMF emissions causing barrier effects to smelt at the Ribble Estuary crossing. The Applicants would also note that the MMO and the Environment Agency have confirmed they have no concerns with respect to effects of EMF from the Ribble Estuary crossing on smelt (see REP1-086 and REP1-076, respectively).	No change.		The Applicants' position remains the same as at Deadline 4, with this reiterated in the Issue Specific Hearing Day 2 submissions (REP4-104, comments 5(b)(i) 19-22). The Applicants highlighted the increased value of broader industry work streams on EMF monitoring instead of project-specific monitoring and are actively engaged with the Crown Estate to advance this area of research. The Applicants note that MMO and Environment Agency have raised no concerns on this point.
NE10	<u>Marine Mammals</u> UXO clearance UXO clearance is included as a licenced activity in the DCO/marine licence (which includes high order clearance). We advise that a separate licence is sought for UXO clearance due to the lack of information available and the over precaution that must be incorporated into the impact assessment at this stage. Natural England advise that UXO clearance should be authorised under a standalone marine licence post consent and removed from the draft DCO. It is possible this issue could be progressed by removing UXO clearance from the DCO/DML.		The Applicants will continue to engage with the Natural England on this matter, however it is the Applicants' position that it is appropriate and justified to include UXO clearance (limited to low order clearance) activities within the draft DCO (REP3-009). The Applicants have included all necessary activities for the construction and operation and maintenance of the Transmission Assets in the application for development consent, to ensure a comprehensive application, and all such activities have been subject to a robust assessment process. This includes UXO clearance activities, with suitable mitigation secured (Outline Marine Mammal Mitigation Protocol (REP2-026) and a commitment to not clear UXO within the Liverpool Bay SPA between Nov – Mar (inclusive) as set out under	No change.		The Applicants position remains the same as at Deadline 4. The Applicants position is aligned with the Morgan Generation Assets position, noting that the Secretary of State retained clearance of UXO by low order methods in the recently made Order for Morgan Generation Assets.

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			CoT130 in Commitments Register (REP3-013)). Including only low order UXO clearance activities within the draft DCO, and appropriate controls under Condition 20 of Schedule 14 and 15 (REP3-009), is intended to remove the need to apply for and obtain a further licence post-consent and prior to construction, assisting with the expeditious delivery of the Transmission Assets project, contributing to UK Government targets for Net Zero. This is consistent with the approach taken for the Morgan Generation project which is awaiting determination and the recently consented Mona Offshore Wind Project.			
NE11	<u>Offshore Ornithology</u> No assessment of long-term loss of habitat supporting prey species for the offshore ornithological features of Liverpool Bay Special Protection Area (SPA). The Applicant has not screened in long term loss of habitat supporting prey species (due to scour/cable protection) for the offshore ornithological features of Liverpool Bay SPA as an impact pathway for Likely Significant Effect (LSE). The Applicant should include an assessment of the indirect effect of long-term habitat loss due to scour/cable protection for prey species of the offshore ornithological features of Liverpool Bay SPA. It is possible this issue could be progressed with further provision of information.		The Applicants welcome the decision to resolve this issue at Deadline 3 and the Applicants will update and submit the relevant documents at Deadline 5. Additionally, the Applicants highlight that a new commitment has been made at Deadline 4 stating that <i>"The Applicants will not plan routine O&M activities in the original Liverpool Bay SPA (as designated in 2010), including a 2 km buffer between November and March (inclusive) unless in urgent circumstances."</i> (see CoT135 in the updated Commitments Register (F1.5.3/F05)).	No change - we look forward to sight of updated documents.		The Applicants confirm that an updated version of the ES chapter (Volume 2, Chapter 5: Offshore Ornithology (F2.5/F02)) and HRA Stage 2 Information to Support an Appropriate Assessment Part Three (E2.1/F02) have been submitted at Deadline 5.
NE12	"Assessment and conclusion of no adverse effect on site integrity for the red-throated diver and common scoter features of Liverpool Bay SPA. Natural England do not agree that an adverse effect on site integrity for the red-throated diver and common scoter features of Liverpool Bay SPA can be ruled out due to the displacement and disturbance impacts of the Project in-combination with other projects during the sensitive winter period. The Project's impact can be removed by the Applicant committing to a full restriction on construction activity within the wintering months of November-March inclusive. Potential resolution. This is subject to the Applicant bringing forward an appropriate seasonal restriction to address the potential impacts to the species.		The Applicants welcome the resolution of this issue at Deadline 3.	No further update due to resolution at D3.		
NE13	<u>Onshore Ecology and Nature Conservation</u> Impacts to sand dune Lytham St Annes SSSI features.		The Applicants have undertaken an updated NVC survey of the Lytham St Anne's Dunes SSSI/ LNR to provide a more	In progress. Please see RI_G1 for further information on this matter.		The Outline Hydrogeological Risk Assessment for Lytham St Annes Dunes (S_D3_6/F02) has been resubmitted at

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	<p>Issues remain around certain features particularly changes to the water table, dewatering effects during construction using Transition Joint Bays (TJB) and the impacts on dune slack vegetation.</p> <p>The Applicant needs to more thoroughly assess the impacts on dune slack vegetation and consider a more precautionary approach with regards to the recoverability / resilience of the dune slacks relating to dewatering effects.</p> <p>It is possible this issue could be progressed with further provision of information including additional monitoring of water table pre- and post- construction and sufficient baseline data.</p>		<p>up-to-date baseline showing the groundwater dependent ecosystems (the survey was completed week commencing 21st July). However as discussed in previous responses on this matter, it is not considered that the habitats will have changed significantly since the 2016 NVC survey reported in the chapter (noting that the 2016 survey was already ground-truthed with an updated walkover survey in August 2024). The approach to avoidance and mitigation of the SSSI habitats will therefore not change, although the data will be used to inform the hydrogeological risk assessment (CoT41, CoT119). The NVC survey report will be submitted into the examination at Deadline 5.</p> <p>The Applicants are planning to undertake the remaining NVC survey of the St. Annes Old Links Golf Course BHS in September 2025 subject to landowner permission and will include this in the NVC survey report submitted at Deadline 5.</p>			<p>Deadline 5 following review of comments received from both the Environment Agency (REP4-132) and Natural England (REP-140). The Applicants would highlight that they have updated the outline Hydrogeological Risk Assessment for Lytham St Annes Dunes (S_D3_6/F02) to include the results of the NVC surveys at Lytham St Annes Dunes SSSI and the St. Annes Old Links Golf Course BHS.</p> <p>The Applicants have made a commitment (CoT128 of Volume 1, Annex 5.3: Commitments Register of the ES (F1.5.3/F06)) to undertake detailed hydrogeological risk assessment(s) in relation to the crossing of the Lytham St Annes Dunes SSSI. These assessment(s) will be used to inform the detailed site-specific crossing design(s) for the installation of the offshore export cables beneath Lytham St Annes Dunes SSSI. This is secured by Requirement 8 of Schedules 2A and 2B of the draft DCO (C1/F07).</p>
NE14	<p>Additional information required on Direct Pipe Trenchless Technique to be able to fully assess the potential impacts to Lytham St. Annes Dunes SSSI.</p> <p>Insufficient detail on Direct Pipe, to fully assess the potential impacts on the SSSI.</p> <p>No inclusion of an outline contingency plan and no assessment of the Worst Case Scenario (WCS) i.e. no other option assessed if Direct Pipe is not an option.</p> <p>Provide further detail on the Direct Pipe methodology to be able to fully assess the potential impacts to the SSSI.</p> <p>Assess the WCS including a contingency should Direct Pipe not be possible.</p> <p>It is possible this issue could be progressed with further provision of information."</p>		<p>The Applicants are engaging with Natural England regarding their concerns about potential impacts on the sand dune features of the Lytham St Anne's Dunes SSSI.</p> <p>The Applicants submitted an Outline Hydrogeological Risk Assessment (REP3-061) at Deadline 3. The Applicants anticipate comments from Natural England at Deadline 4.</p> <p>A meeting was held on 12 June 2025 to discuss the proposed scope and structure of the Outline Hydrogeological Risk Assessment. Feedback from the call was used to amend the Outline Hydrogeological Risk Assessment content where appropriate.</p>	No change.		<p>The Applicants have prepared and submitted an Outline Trenchless Crossing Mitigation Plan as Appendix A to the Outline Landfall Construction Method Statement (S_D4_22/F02).</p> <p>The Applicants have received Natural England's comments on the outline hydrogeological risk assessment at D4 (REP-140) and have provided a response to these at D5 (NE13). In addition, the Applicants have updated the Outline Hydrogeological Risk Assessment (S_D3_6) in line with REP-140 and re-submitted at D5 S_D3_6/F0).</p> <p>The Applicants have made a commitment (CoT128 of Volume 1, Annex 5.3: Commitments Register of the ES (F1.5.3/F06)) to undertake detailed hydrogeological risk assessment(s) in relation to the crossing of the Lytham St Annes Dunes SSSI. These assessment(s) will be used to inform the detailed site-specific crossing design(s) for the</p>

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						installation of the offshore export cables beneath Lytham St Annes Dunes SSSI. This is secured by Requirement 8 of Schedules 2A and 2B of the draft DCO (C1/F07).
NE15	<p>Lack of sand dune habitat survey effort.</p> <p>From the information provided, Natural England advise that there is insufficient evidence for us to be able to advise on the scale and significance of impacts to dune slacks at St. Annes Old Links Golf Course BHS.</p> <p>The Applicant needs to undertake detailed dune slack surveys across the Study Area to inform the EIA. These surveys need to be undertaken during summer 2025.</p> <p>It is possible this issue could be progressed with further imminent survey effort and provision of information.</p>		The Applicants are planning to undertake the remaining NVC survey of the St. Annes Old Links Golf Course BHS in September 2025 subject to landowner permission and include this in the NVC survey report submitted at Deadline 5.	In progress. The Applicant informed us that an NVC survey at Lytham St Annes Dunes SSSI and St Annes Old Links Golf Course BHS will be undertaken in July. We welcome this survey effort and will provide comments once the results are provided.		<p>The Applicants can confirm that NVC surveys of Lytham St Annes SSSI and St Anne's Old Links Golf Course Biological Heritage Site have been undertaken. The results of these surveys can be found in Appendix D and E of Volume 3, Annex 3.3: Phase 1 habitat, national vegetation classification and hedgerow survey technical report (F3.3.3/F03).</p> <p>In summary the NVC communities at the SSSI are as previously reported and include shallow-groundwater dependent dune slacks primarily on the eastern side of Clifton Drive North. The BHS does not support any groundwater dependent terrestrial ecosystems, which also concurs with the assumptions made in the ecological impact assessment and Outline Hydrogeological Risk Assessment (S_D3_6/F02).</p> <p>In addition, the Applicants have updated the outline hydrogeological risk assessment at D5 (S_D3_6/F02) to reflect the NVC survey findings.</p>
NE16	<p>Lack of Agricultural Land Classification (ALC) survey effort.</p> <p>From information provided, Natural England advise that there is insufficient evidence for us to be able to advise on the scale and significance of impacts to soils.</p> <p>The Applicant needs to undertake a detailed ALC and soil survey of the agricultural land across the full Study Area to inform the EIA. These surveys need to be undertaken during summer 2025. Natural England advises that the commitment to restore land needs to be secured in the DCO.</p> <p>It is possible this issue could be progressed with further imminent survey effort and provision of information.</p>		<p>The Applicants have presented their position in response to these points within their response to Hearing Action Points 'Agricultural land classification surveys' (REP1-043). The Applicants consider that the survey coverage is appropriate and have provided examples of other DCOs which have followed the same approach with regards to survey coverage. The Applicants' assessment is in accordance with best practice and follows a precautionary approach with regards to the total area of BMV that would be affected. The same approach was used in the Mona Offshore Wind Project that was recently granted its DCO.</p> <p>The Applicants have committed to undertaking further soil surveys post</p>	No change.		The Applicants note there is no change on this matter and refer Natural England to NE16 in 'S_D4_2.6 Annex 2.6 to Applicants' Response to Deadline 3 submissions from Statutory Consultees and other organisation: Natural England (REP3-90 - REP3-95, AS-078) - Rev F01' (REP4-100). The Applicants requested a meeting with Natural England to try and understand why they have a different approach to other projects when compared to Transmission Assets. As Natural England have declined a meeting and not given a justification on their approach the Applicants conclude that this is a point where the parties will agree to disagree.

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			<p>consent. These surveys will include areas not previously surveyed within the Onshore Order Limits (for example, along the onshore export cable corridor) required for temporary and permanent use as part of the Transmission Assets. These surveys would provide soil information (as set out in the Outline Soil Management Plan (APP-200)) with the purpose of informing the detailed Soil Management Plans. The detailed Soil Management Plans will be specific to the location of any stage of works within the Onshore Order Limits and the measures will reflect the specific characteristics of the soils and the infrastructure elements proposed in that location (temporary or permanent land requirements). Results from the soil surveys will be shared with Natural England.</p> <p>The Applicants note that the Outline Soil Management Plans have been drafted in accordance with best practice and include the recognised soil handling and restoration guidance. The detailed Soil Management Plans will be based on the Outline Soil Management Plans and will be agreed with the relevant planning authority in consultation with Natural England, prior to the commencement of construction. The Applicants have committed to implement the detailed Soil Management Plan as agreed with the relevant planning authority. The Soil Management Plan forms part of the Code of Construction Practice and is secured in the draft DCO.</p> <p>With the commitments in place to undertake the further soil surveys at detailed design stage, the Applicants are unclear why Natural England require the surveys to be undertaken at this stage. The Applicants would welcome the opportunity to work through the points raised by Natural England. This would be best achieved on a call with the soils specialist to explain the Applicants' approach and to work towards a solution.</p>			
NE17	Developing on areas of restorable peat.		The Applicants have produced a note at Deadline 4 (S_D4_15) to provide additional	No change. Please see RI_G7 for further information on this matter.		The Applicants note there is no change on this matter and refer Natural England to

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	<p>There is insufficient information to ascertain whether the proposal will have direct or indirect impacts on deep peat. Provide further evidence to show if restorable peat is present. This should include peat data for the route of the cables and include soil cores in the areas mapped as deep peat England Peat Status Greenhouse Gas and Carbon Storage.</p> <p>It is possible this issue could be progressed with further provision of information.</p>		<p>information on the consideration of the potential impacts of the Transmission Assets on peat resources, including desk top studies and site surveys. This note concludes that the nature and extent of peat resources and their land use function within the Transmission Assets Order Limits is understood and the measures proposed through the implementation of the Outline Code of Construction Practice (REP3-009), including the Outline Soil Management Plan (APP-200), are appropriate to ensure that the agricultural peat resources can be appropriately managed and the land restored to its productive agricultural land use following construction of the Transmission Assets.</p> <p>The Applicants would still welcome the opportunity to meet with Natural England's specialist to engage further on this point.</p>			<p>NE17 in 'S_D4_2.6 Annex 2.6 to Applicants' Response to Deadline 3 submissions from Statutory Consultees and other organisation: Natural England (REP3-90 - REP3-95, AS-078) - Rev F01' (REP4-100).</p>
NE18	<p><u>Onshore and Intertidal Ornithology</u></p> <p>Impacts to Ribble and Alt Estuaries SPA/Ramsar site intertidal waterbirds due to the landfall works.</p> <p>Natural England advise that the proposed level of restriction to the landfall works is insufficient to avoid an adverse effect on the Ribble & Alt Estuaries SPA/Ramsar site.</p> <p>The Applicant should develop comprehensive seasonal restrictions for the key intertidal species and months of the year. These should be underpinned by updated HRA conclusions based on data from site specific surveys, and a more thorough assessment of the potential habitat loss/disturbance effects and their implications for SPA/Ramsar site species.</p> <p>Potential resolution</p> <p>This is subject to the Applicant bringing forward an appropriate level of seasonal restriction to address the potential impacts to the species.</p>		<p>The Applicants remain fully committed to addressing these matters and to working collaboratively with Natural England to reach a resolution. In support of this commitment, the Applicants met with Natural England on 25 July 2025 and are working closely with Natural England to address this issue and are currently in discussions about measures to reduce impacts at source.</p>	<p>No change. Natural England has met with the Applicant and provided detailed DAS advice. We look forward to updated submissions regarding impacts at the landfall and the Applicant's proposed mitigation.</p>		<p>Following a meeting with Natural England on 16th September 2025 during which extra detail was provided, both Natural England and the Applicants came to agreement that the Project does not represent AEoI for the works in the intertidal area. This is a result of a combination of:</p> <ul style="list-style-type: none"> • The Nov-Mar seasonal restriction on works at St Annes beach (CoT110 and CoT129) thus avoiding impacts upon wintering features. • The inclusion of the alleviation measures to reduce disturbance on roosting birds at Fairhaven Saltmarsh, and the inclusion of an ECoW at the construction area. • The sporadic use of the area by roosting birds thus removing impacts for the occasionally roosting dunlin, sanderling and ringed plover (the alleviation measures at Fairhaven Saltmarsh will help to reduce SPA level disturbance pressures on these species).

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						<ul style="list-style-type: none"> The low numbers of redshank to be impacted (below 1% of the SPA population). The low numbers of foraging sanderling to be impacted (below 1% of the SPA population). The limited impacts of construction (only one cable at a time leading to limited habitat loss and disturbance impacts).
NE19	<p>Lack of an in-principle derogations case for impacts to intertidal SPA/Ramsar site waterbirds.</p> <p>Unless effective seasonal restrictions for the wintering and passage periods can be committed to, we advise that an in-principle derogations case will need to be developed. This would need to demonstrate no alternative solutions to delivering the public interest objectives of the project and Imperative Reasons of Overriding Public Interest (IROPI).</p> <p>A robust in-principle derogations case should be submitted into the Examination, including a demonstration that a greater degree of seasonal restriction is not achievable, and a far more detailed submission regarding the installation and management of the compensatory measures.</p> <p>Potential resolution.</p> <p>This is subject to the Applicant providing an in-principle derogations case demonstrating that there are no alternative solutions to delivering the project's objectives, including a greater degree of seasonal restriction, and a detailed proposal for compensatory measures."</p>		<p>The Applicants remain fully committed to addressing these matters and to working collaboratively with Natural England to reach a resolution. In support of this commitment, the Applicants met with Natural England on 25 July 2025 and are working closely with Natural England to address this issue and are currently in discussions about measures to reduce impacts at source.</p> <p>In light of the measures to minimise the impacts at source (e.g., seasonal restriction (CoT110), ECoW, and screening of construction works (section 1.6 of the Outline Ecological Management Plan), the Applicants do not believe that the works at the landfall would result in AEOL and have set out their position regarding this in a note to be submitted at Deadline 4 (AEOL - ISH2.12). As a result, the Applicants share Natural England's view (Q6.1.2, in REP3-095, Responses to the Examining Authority's written questions) that if disturbance effects at the landfall during the passage season can be reduced to acceptable levels through mitigation, the Fairhaven Saltmarsh should be considered as an enhancement measure.</p>	"NE18 is also applicable here. No change to our concerns regarding Fairhaven saltmarsh.		<p>Following a meeting with Natural England on 16th September, it was agreed that the measures proposed at Fairhaven saltmarsh represent alleviation, and as Natural England are satisfied that the Project's planned activities in the intertidal do not represent AEOL, there is no need for an in-principle derogation case. This is the view of both the Applicants and Natural England.</p>
NE20	<p>Impacts to Ribble and Alt Estuaries SPA/Ramsar terrestrial waterbirds.</p> <p>Natural England advise that there is not currently enough information within the Application to rule out impacts for wintering, passage and terrestrial features of Ribble and Alt Estuaries SPA/Ramsar site.</p> <p>We require further clarity from the Applicant on the following aspects: HRA conclusions should be based on data from site</p>		<p>The Applicants have provided further detail on this in the Terrestrial Waterbirds technical note (S_D4_17) submitted at Deadline 4 as well as updates to the Outline Ecological Management Plan. The Applicants note that this information was well received during the meeting with Natural England on 25 July 2025 and await a response from NE but hope that this</p>	No change. Natural England has met with the Applicant and provided detailed DAS advice. We look forward to updated submissions providing the required level of information regarding the habitat management proposed at the mitigation sites and how these will cater for the SPA waterbirds predicted to be impacted.		<p>The Applicants have submitted the following documents at D4 and await Natural England's response:</p> <ul style="list-style-type: none"> S_D4_17 Onshore Terrestrial Waterbird Note - Rev F01 (REP4-120)

ID	Risk and Issue Log comment	NE Rel Rep RAG rating and D1	Applicants' comment at Deadline 4 (in response to NE D3 submission)	Natural England's Comments/Update on Progression at Deadline 4	RAG D4	Applicants' comment at Deadline 5 (in response to NE D4 submission)
Taken from NE's Relevant and Written Representations						
Morgan and Morecambe Transmission Assets - Principal Areas of Disagreement Summary Statement (PADSS)						
	<p>specific surveys, habitat loss and its implications for SPA/Ramsar site species should be further quantified, proposed mitigation areas need further justification on their appropriateness.</p> <p>Potential resolution.</p> <p>This is subject to the Applicant providing further information to support their HRA conclusions, consideration of spatial scheduling to reduce the level of impact, and greater detail on the proposed mitigation habitats."</p>		addresses Natural England's concerns regarding impacts on terrestrial waterbirds.			<ul style="list-style-type: none"> J6 Outline Ecological Management Plan (Clean) - Rev F04 (REP4-058) <p>The Applicants welcome Natural England's comments on these documents.</p> <p>In addition, The Applicants have updated; HRA Stage 2 ISAA Part 3 (E2.3) and submitted the revised version at Deadline 5 (E2.3/F02); J6 Outline Ecological Management Plan (J6/F05) as requested by Natural England. The detail requested in the oEMP is contained within Appendix B</p>
NE21	<p>Mitigation of impacts to Newton Marsh SSSI.</p> <p>Impacts to Newton Marsh SSSI have not been sufficiently assessed. There is minimal information on what works will take place in close proximity to this site and how the work will be managed to not affect the site.</p> <p>Natural England advise that further consideration of Newton Marsh SSSI is included and updated within the assessment. Further justification should be provided on how the Applicant has concluded no risk to the site and what mitigation measures might be implemented.</p> <p>It is possible this issue could be progressed with further provision of information.</p>		<p>The Applicants welcome Natural England's conclusion that there will be no adverse effects on Newton Marsh SSSI.</p> <p>The Applicants have committed to update information in HRA Stage 2 Information to Support an Appropriate Assessment Part Three (APP-017) (for onshore and offshore ornithology) at Deadline 5.</p>	No change - we look forward to updated documents including the ISAA.		The Applicants have updated the HRA Stage 2 ISAA Part 3 (E2.3) and submitted the revised version at Deadline 5 (E2.3/F02).
NE22	<p><u>Fylde MCZ</u></p> <p>MCZ assessment and Measures of Equivalent Environmental Benefit (MEEB).</p> <p>Natural England do not agree with the Applicants conclusion of no likelihood of hindering the conservation objectives of Fylde MCZ, which has been designated for subtidal sand and subtidal mud. It is our opinion that the impact on Fylde MCZ will be long term and will alter the extent of the physical attributes and distribution of biological communities supported by these features.</p> <p>Natural England advise that every effort should be made to reduce the impacts through the adoption of robust mitigation measures, including commitments to remove infrastructure at the decommissioning phase.</p> <p>Natural England advise that the MCZ assessment should proceed to a stage 2 assessment and provide a without prejudice MEEB case.</p> <p>Unless the Applicant's position changes, it is unlikely that there will be agreement between the Applicant and Natural England during examination on this issue.</p>		The Applicants welcome the resolution of this issue at Deadline 3.	No further update due to resolution at D3.		N/A

3.3 Risk and Issues Log – DCO and dMLs

Table 3-3: Responses to questions regarding the DCO and dMLs.

ID	Risk and Issue Log comment	RAG Status Rel and WR Rep and D1	Applicants' comment at Deadline 4	~Consultation, actions, progression	RAG Deadline 4	Applicants comment at Deadline 5
RI_A1	The definition of commence and offshore preparations works within the DCO and all three DMLs must be amended by the Applicant to exclude all works except pre-construction surveys to inform the construction plans and mitigation.					
RI_A2	Due to the increasing complexity of construction of large offshore works, we advise that six months is considered an appropriate period prior to construction, not four months as stated in Schedule 14 and 15 Part 2 Condition 19(10, [APP-005].					
RI_A3	The definition of 'maintain' within the DCO and schedules 14-17 of the deemed Marine Licences (dML) restricts work that is materially different or has materially different impacts. The Applicant should amend the wording to ensure maintenance works do not lead to impacts in excess of those assessed within the ES.					
RI_A4	The Applicant should remove the definition of Natural England in Article 2 (1) [APP-005] and replace with a definition of Statutory Nature Conservation Body (SNCB), all references to Natural England throughout the DCO and DML (and Schedules) should be amended to state the relevant SNCB.		The Applicants confirm that this amendment was incorporated to the draft DCO (REP3-009) at deadline 3.	Resolved. Natural England welcomes the Applicant's updates to the DCO. The definition of Natural England has been replaced with the definition of SNCB and references to Natural England throughout the DCO and dMLs have been amended to state the relevant SNCB.		Noted with thanks. The Applicants understand this matter is now closed.
RI_A5	The Applicant should amend [APP-005] Schedule 2A Table 3 of the DCO to include maximum number and size of UXOs to remove using high order detonations. This should also be updated in Schedule 2B table 4 and in Schedules 14 and 15. If the information required to undertake a full assessment is not yet available, UXO clearance should not be included as a licensed activity in the DCO - a standalone Marine Licence should be sought post-consent from the MMO.		The Applicants refer to their response at REP3-056 to the Examining Authority's Written Question 2.5.1 where the Applicants state that it is unlikely full agreement will be reached on this matter and notes that the made Order for the Mona Offshore Wind Project retains the 'low order unexploded ordnance clearance' condition (Condition 21(1) in Schedule 14 of the made Order).	No change.		The Applicants updated Condition 20 in Schedule 14 and Schedule 15 of the draft DCO (REP4-007) at Deadline 1 to include a limit on the permitted number of low order UXO clearances. It is the Applicants' position that to add these limits into Schedules 2A and 2B would be unnecessary duplication and cause confusion at the point of discharge of the requirements/DML conditions as they will take place wholly within the area within the MMO's jurisdiction and therefore covered by the dML. It is sufficiently robust to secure these limits within the deemed marine licences, which also avoids any programme delivery risk where, for example, permission for clearance of an additional UXO was required: limits secured within the deemed marine licences (DML) would require a marine licence variation, but limits set out in the DCO would require a material or non-material variation to the DCO, which is not a prescribed process and generally take 12 months or significantly longer. Securing limits on numbers of UXO for clearance within the DMLs is sufficient and appropriate. The Applicants note that neither the ExA nor the SoS imposed limitations on the number

ID	Risk and Issue Log comment	RAG Status Rel and WR Rep and D1	Applicants' comment at Deadline 4	~Consultation, actions, progression	RAG Deadline 4	Applicants comment at Deadline 5
						of low order UXO clearances within the Requirements in the recently consented Morgan Generation DCO (instead securing that this is agreed under condition 23 of DML1).
RI_A6	The Applicant has committed to Biodiversity Net Gain (BNG), but has not included it as a DCO requirement. The Applicant should include a requirement that secures the delivery and maintenance of BNG as a matter of good practice.		The Applicants thank Natural England for their confirmation that this matter is considered closed.			
RI_A7	Micro-siting around features of conservation importance, such as reef of Annex I quality, is a standard mitigation. We request that the requirement to consider micro-siting around features of conservation importance be secured within the DMLs, as it is currently with respect to archaeological interest features.		The Applicants confirm that this amendment was incorporated to the draft DCO (REP3-009) at deadline 3. The Applicants also refer to their response at NE6 above.	Natural England welcomes the updated wording for micro-siting in the DCO under Schedules 14 and 15. We maintain that where it is not possible to avoid broadscale NERC habitats, further mitigation should be demonstrated as with our comments in the physical processes and benthic ecology tabs. With regards to the suitability of the wording in the DCO, we consider this matter closed at D4.		The Applicants understand this matter is now closed.
RI_A8	a) Natural England requests that a condition to secure an updated Offshore Operations and Maintenance Plan (OOMP) be included, we note this is a standard condition of most OWFs. b) Additionally, it should be stipulated within the OOMP that cable protection may only be deployed under this consent for a period of ten years post-construction outside of Fylde MCZ, and no deployment of cable protection during O&M within Fylde MCZ. Any additional cable protection within Fylde MCZ will require a new Marine Licence.		In response to Natural England's comments, the Applicants included a new commitment in the Outline Offshore Operations and Maintenance Plan, which has been updated and submitted at Deadline 4 (J19 / F02). Briefly, the DCO would allow for further cable/scour protection works, cable reburial, repair or replacement to the maximum design scenario (MDS) set out in the Project Description (REP2-008) and Outline OOMP (J19/F02), after which a new marine licence would be required. Furthermore, with specific reference to cable/scour protection, the Applicants have made a commitment in the updated Outline OOMP (J19/F02) to limit the development of cable/scour protection in the O&M phase to the first ten years / limit of the MDS (whichever is first) outside the Fylde MCZ and the first two years inside the MCZ (See also the Applicants response to RI_C2. Finally, the Applicants have also made a commitment at Deadline 4 to no cable/scour protection shall be permanently deployed in the intertidal area between MLWS and MHWS (see CoT133; F1.5.3/F05).	No change.		The Applicants' position remains as set out at Deadline 4 (see REP4-100) and the Applicants await feedback from Natural England at Deadline 5 as to whether the updates made to the Outline Offshore Operations and Maintenance Plan at Deadline 4 (REP4-072) addressed the outstanding matters.
RI_A9	Schedule 14 and 15 Part 2 Condition 20 relates to the detonation of UXOs, however there is no mention within this condition of securing the use of Noise Abatement Systems (NAS). Amend the condition to include the need to consider the use of NAS.					
RI_A10	Schedule 14 and 15 Part 2 Conditions 24, 25 and 26 do not include any of the detailed ecological		The Applicants refer to their previous response to this point at REP3-055 and to their response at	No change.		The Applicants' position remains as set out at Deadline 4 (see REP4-100) and the Applicants await

ID	Risk and Issue Log comment	RAG Status Rel and WR Rep and D1	Applicants' comment at Deadline 4	~Consultation, actions, progression	RAG Deadline 4	Applicants comment at Deadline 5
	monitoring required, except for monitoring during construction piling. We would expect benthic surveys to be conducted to identify any features of conservation importance. We would also expect post-construction monitoring to be secured for any features of conservation importance identified in the pre-construction surveys that are predicted to be impacted by construction, in order to monitor their recovery. The Applicant should update the monitoring conditions to secure these.		REP3-056 to the Examining Authority's Written Question 2.5.1 where the Applicants state that it is unlikely full agreement will be reached on this matter. However, the Applicants have committed to pre and post construction monitoring of benthic communities within the Fylde MCZ to monitor for temporal and spatial recovery, which is secured through the updated Offshore In Principle Monitoring Plan submitted at Deadline 4 (J20 / F03).			feedback from Natural England at Deadline 5 regarding the commitments to pre and post-construction monitoring for spatial and temporal recoverability of benthic communities and of the potential colonisation by Invasive Non-Native Species (INNS) following construction activities within the Fylde MCZ secured in the updated Offshore In Principle Monitoring Plan submitted at Deadline 4 (REP4-074).
RI_A11	The recent SoS decision for Sheringham and Dudgeon Extensions Project (SADEP) approved Condition 20 in Schedules 10 and 11 of SADEP DCO based on a recommendation from Natural England and the MMO for particular impacts requiring remediation or further mitigation works. Natural England advises that a similar condition should be included within all offshore wind dMLs.		The Applicants refer to their previous response to this point at REP3-055 and to their response at REP3-056 to the Examining Authority's Written Question 2.5.1 where the Applicants state that it is unlikely full agreement will be reached on this matter.	No change.		The Applicants have updated the Offshore In Principle Management Plan at Deadline 5 (J20/F04) to incorporate and secure adaptive management. Reference to adaptive management has not been included in the updated draft DCO submitted at Deadline 5 (C1/F07) to maintain alignment with the recently made Morgan Offshore Wind Project Generation Assets Order.
RI_A12	Offshore emergency works have not been clearly defined by the Applicant within the outline OOMP or the DCO. We advise that the Applicant should define 'offshore emergency works' in the DCO/dML and this definition should be updated within the outline OOMP. The MMO's guidance on emergency works offshore should be followed and referred to within the Application.		The Applicants have updated the Outline OOMP at Deadline 4 (J19 / F02) to clarify that reference to offshore emergency works refers to cable repair or the reburial of cables that have become exposed and which could present a risk to navigation, both of which are included in Table 1.1 of the updated Outline OOMP.	No change.		The Applicants' position remains as set out at Deadline 4 (see REP4-100) and await feedback from Natural England at Deadline 5 regarding the amendment made to the Outline Offshore Operations and Maintenance Plan at Deadline 4 (REP4-072).
R1_A13			The Applicants confirm that this amendment was incorporated to the draft DCO (REP3-009) at Deadline 3 which should resolve this matter.	Resolved. We welcome the Applicant's updated wording in the draft DCO which has been amended to allow for 15 business days.		Noted with thanks. The Applicants consider this matter to be closed.

3.4 Risk and Issues Log – Physical Processes

Table 3-4: Responses to questions regarding Physical Processes

ID	Risk and Issue Log comment	RAG Status Rel and WR Rep and D1	Applicants' comment at Deadline 4 (in response to NE D3 submission)	Natural England's Comments/Update on Progression at Deadline 4	RAG D4	Applicants' comment at Deadline 5 (in response to NE D4 submission)
Risk and Issues Log Deadline 1 – Physical Processes Taken from Natural England's Relevant and Written Representations Morgan and Morecambe Transmission Assets Appendix B - Physical Processes						
RI_B1	<p>a) There is uncertainty regarding the likely success of the Direct Pipe Trenchless Technique. Further details on the Direct Pipe Trenchless Technique, associated infrastructure, and the sediment geology, is required to be able to fully assess the potential impacts on coastal processes at the landfall.</p> <p>b) An outline contingency plan should be developed, and the worst-case should be assessed and included within the relevant Application documents i.e. cable installation failure when using the Direct Pipe Trenchless Technique.</p>		<p>The Applicants have undertaken engineering analysis to determine suitability of this technique. The Applicants have provided appropriate examples of where this has been successfully employed within the response RR-1601.B 1601.B.8 (PDA-016). In the unlikely event of failure, a variation with associated assessment will be required under the terms of the DCO.</p> <p>Additionally, the Applicants have made a commitment (CoT114) to ensure that all permanent infrastructure (i.e. the offshore export cables) located between mean low water springs (MLWS) and mean high water springs (MHWS) will be buried to a target depth of 3 m. As such, no external protection would be required at the surface in the intertidal. In confirmation of this, the Applicants have included a new commitment that no cable/scour protection shall be permanently deployed in the intertidal area between MLWS and MHWS in the Commitments Register submitted at Deadline 4 (CoT133, F1.5.3/F05). Therefore, there will be no impacts on coastal processes at landfall.</p>	No change.		<p>The Applicants have updated Volume 2, Chapter 1: Physical processes (F2.1/F02) at Deadline 5 to include all additional clarifications/justifications provided in submissions at previous deadlines to address Natural England's comments relating to the landfall and to include reference to all new commitments made at previous deadlines.</p>
RI_B2	<p>There is currently no commitment to the removal of cable/scour protection at end of project life (decommissioning). Natural England advises that a commitment to remove all on and above seabed infrastructure associated with the development within benthic designated sites (excluding cable crossings) at the time of decommissioning should be secured in the DCO, to prevent permanent impacts to marine</p>		<p>The Applicants note Natural England's approval of the removal of 'rock dump' as a cable protection option in the Outline CSIP (REP2-022) and Project Description (REP2-008).</p> <p>With regard to Natural England's final point, the Applicants have updated the draft DCO submitted at Deadline 4 (C1/F06) to include no rock dump in Condition 18(e) of Schedule 14 and 15 to align with the commitment already made in the Outline CSIP (REP2-022).</p> <p>Regarding the requested commitment to decommissioning all infrastructure and cable protection (with the exception of cable crossings) within the Fylde MCZ. The Applicants responded previously to this point within RR-1601.42 of their response to Natural England (PDA-014). As detailed in the Outline CSIP (REP2-022), the Transmission Assets</p>	<p>In progress. In a meeting held with the Applicant on 22/07/24, the Applicant informed NE that they intend to include a commitment that relates to this issue at D4. We will therefore revisit this matter once the Applicant has submitted the relevant information into Examination.</p>		<p>The Applicants have updated Volume 2, Chapter 1: Physical processes (F2.1/F02) at Deadline 5 to include all new commitments made at previous deadlines.</p>

ID	Risk and Issue Log comment	RAG Status Rel and WR Rep and D1	Applicants' comment at Deadline 4 (in response to NE D3 submission)	Natural England's Comments/Update on Progression at Deadline 4	RAG D4	Applicants' comment at Deadline 5 (in response to NE D4 submission)
	physical processes. Without a commitment in the DCO, the worst-case scenario should assess the impacts of leaving assets permanently in situ. It is also noted that leaving cable protection on the seabed even outside of designated sites is not aligned with OSPAR		<p>design is considering multiple cable protection options. The Outline CSIP (REP2-022) identifies that cable burial is the preferred option for cable protection where practicable (CoT54) and should cable protection be required within the Fylde MCZ, it will be designed to be removable (CoT108) with the requirement for removal agreed with stakeholders and regulators at the time of decommissioning (CoT109).</p> <p>The use of cable/scour protection, where required, will be evaluated and further considered post-consent in Detailed CSIPs, focusing on both engineering suitability and environmental recoverability. The CSIPs are part of the Offshore Construction Method Statements that are secured in the Draft DCO (AS-004) in:</p> <p>Condition 18(1)(e)(i) of Schedule 14 for the Morgan Offshore Wind Project: Transmission Assets; and</p> <p>Condition 18(1)(e)(i) of Schedule 15 for the Morecambe Offshore Windfarm: Transmission Assets.</p> <p>The Applicants will submit a draft decommissioning programme to the Secretary of State for approval as required by the Energy Act 2004 prior to the commencement of construction This is standard practice for offshore wind farm projects, and the decommissioning programme will be updated throughout the assets' lifespan to incorporate changing best practice and new technologies. Offshore decommissioning is secured under Requirement 21 of Schedule 2A and Schedule 2B of the draft DCO (AS-004).</p>			
RI_B3	a) There is currently insufficient information on the anticipated location, extent and design of cable protection measures placed along the Export Cable Corridor (ECC). Further information should be provided on location, extent and design of cable protection measures for us to advise on the potential impacts of cable protection on		The Outline CBRA (APP-219) details sub-seabed geology and ground conditions and Depth of Lowering (burial depth) for cable burial along the full length of the cable corridor. In particular, the first section presented is the Export Cable Landing Section (KP0 – KP13.25) which extends from the Transition Joint Bays (TJBs) onshore out to a distance of 13.25 km offshore at a depth 14.23m chart datum (CD) and incorporates Depth of Closure (DoC) which is circa 10m CD. The information from the Outline CBRA indicates from LAT to DoC geological conditions are suitable for trenching to required depth. Cable crossings	In progress. In a meeting held with the Applicant on 22/07/24, the Applicant informed NE that they intend to include a commitment that relates to this issue at D4. We will therefore revisit this matter once the Applicant has submitted the relevant information into Examination.		The Applicants have updated Volume 2, Chapter 1: Physical processes (F2.1/F02) at Deadline 5 to include all additional clarifications/justifications provided in submissions at previous deadlines to address Natural England's comments relating to the landfall and to include reference to all new commitments made at previous deadlines.

ID	Risk and Issue Log comment	RAG Status Rel and WR Rep and D1	Applicants' comment at Deadline 4 (in response to NE D3 submission)	Natural England's Comments/Update on Progression at Deadline 4	RAG D4	Applicants' comment at Deadline 5 (in response to NE D4 submission)
	<p>sediment transport pathways, particularly within Fylde MCZ .</p> <p>b) Further consideration within the assessments should be given to changes to sediment transport processes and seabed morphology due to the placement of cable protection measures at these locations. This should be updated within the relevant Application documents.</p> <p>c) Further options to minimise/mitigate impacts from cable protection on physical processes should be explored.</p>		<p>are located further offshore beyond the of DoC.</p> <p>The Outline CSIP (REP2-022) confirms that due to the sediment type found in the nearshore area and Fylde MCZ (i.e. predominantly sand and mud), traditional burial techniques are suitable to achieve the target burial depths and as per commitment CoT54 (REP3-013) identifies that cable burial is the preferred option for cable protection where practicable.</p> <p>It is therefore not anticipated that external cable protection would be required in the nearshore and this is to be confirmed by pre-construction surveys. However, in the unlikely event that burial to the target depth is not achievable, commitment CoT45 (REP3-013) states that cable protection will be tailored to the specific location and installed to limit change in water depth to no more than 5% (referenced to Chart Datum).</p> <p>The 5% limitation is secured in the draft DCO (REP3-009) under Condition 18(e) of Schedules 14 and 15. Whilst the basis of this limitation, which has been standard in DCOs for many years, is to maintain sufficient under-keel clearance of vessels to minimise the risk of vessel fouling, its applicability to minimising the potential for effects on physical processes and other environmental receptors is valid. In practical terms the 5% limitation means that in 10 m water depth, cable protection, if required, cannot exceed 0.5 m and in 5m water depth, this is reduced to 0.25 m. At water depths of less than 5 m, the potential for any cable protection is none.</p> <p>Additionally, the Outline CSIP (REP2-022) states that, should cable protection be required in shallow water, protection will be sufficiently low profile and /tapered to cause minimal changes to wave, tide and sediment transport.</p> <p>With regards to mitigation, commitment CoT114 (REP3-013) states that all permanent infrastructure located between Mean Low Water Springs (MLWS) and Mean High Water Springs (MHWS) will be buried to a target depth of 3 metres, subject to further pre-construction surveys to be reported within Detailed CBRAs. Moreover, a further commitment has made at Deadline 4 (see CoT133, in the updated Commitments Register (F1.5.3/F05)) states that “no</p>			

ID	Risk and Issue Log comment	RAG Status Rel and WR Rep and D1	Applicants' comment at Deadline 4 (in response to NE D3 submission)	Natural England's Comments/Update on Progression at Deadline 4	RAG D4	Applicants' comment at Deadline 5 (in response to NE D4 submission)
			<p><i>cable/scour protection shall be permanently deployed in the intertidal area between MLWS and MHWS".</i></p> <p>The Applicants will update Volume 2, Chapter 1: Physical Process (APP-042) for submission at Deadline 5 to include information from the CBRA which indicates from LAT to Depth of Closure (circa 10m CD) geological conditions suitable for trenching to required depth.</p>			
RI_B4	<p>a) We note that limited mitigation in relation to physical processes or benthic receptors during sandwave and boulder clearance has been proposed and further consideration should be demonstrated.</p> <p>b) Natural England advises that impacts to priority habitats under Section 41 of the NERC Act 2006 are avoided and due consideration is demonstrated. We advise that relevant Application documents should be updated accordingly and this is secured within the DCO/DMLs.</p>		<p>To minimise its impact, the Applicants reiterate the reductions in project parameters between the PEIR and final application, including:</p> <p>Reduction in sandwave clearance across offshore export cable route; reduced from 60% at PEIR to:</p> <ul style="list-style-type: none"> • 5% within MCZ and 10% outwith MCZ • 9% total across offshore export cable <p>And a reduction in cable protection parameters reduced from PEIR (20% for Morgan OWL and 15% Morecambe OWL) to:</p> <ul style="list-style-type: none"> • 3% within MCZ (as contingency with cable burial preferred method of cable protection) • 10% total across offshore export cable <p>The Applicants highlight that these reductions have significantly reduced impacts to all benthic subtidal receptors, including priority habitats under Section 41 of the NERC Act 2006 as outlined in full the Applicants' response to NE6. The Applicants do not, therefore, consider that further mitigation to avoid these habitats is justified or required. Further, the Applicants do not consider that there is precedent in the offshore wind industry, or other offshore industries, for avoiding the sedimentary habitats recorded within the Transmission Assets and neither would it possible to do so given their widespread distribution within the benthic subtidal and intertidal ecology study area.</p> <p>The Applicants also highlight that biogenic or geogenic reef features were not identified as present within the site-specific surveys (section 2.6.3, Volume 2, Chapter 2: Benthic subtidal and intertidal ecology (APP-045)).he Outline CSIP (REP2-022) states that based on pre-application geotechnical surveys, boulders are present in a low density across the majority of the study area but distributed sporadically</p>	<p>Natural England welcomes the updated wording for micro-siting in the DCO under Schedules 14 and 15. However, we maintain that where it is not possible to avoid broadscale NERC habitats, the Applicant will need to demonstrate that impacts have been minimised as much as possible.</p>		<p>The Applicants' have demonstrated how impacts have been minimised as much as possible within RR-1601.44 of their response to Natural England (PDA-014) and RR-1601.C.4 of their response to Natural England – Appendix C (PDA-017). Similarly regarding sandwave clearance and boulder clearance in RR-1601.B 1601.B.4 and 1601.B.15 – Appendix B (PDA-016) respectively with specific reference to physical processes.</p> <p>The Applicants also set this out in full in their response to NE6 in the Applicants' response to Natural England's Deadline 3 submission (REP4-100) including all new commitments made at Deadline 4.</p> <p>Volume 2, Chapter 2: Benthic subtidal and intertidal ecology (F2.2/F02) and Volume 1, Chapter 1: Physical processes (F2.1/F02) have been updated at Deadline 5 to include the new commitments made at Deadline 4.</p>

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			along the offshore export cable corridor. Therefore, the method of boulder clearance is likely to be subsea grab, especially within the Fylde MCZ. The required boulder clearance width is 20 m centred on each cable, and boulders would be relocated circa 10 m either side from the centreline of each cable. Due to this limited distance, boulders would, inevitably, be relocated to areas of similar habitat, and seabed characteristics would remain unchanged. Therefore, the Applicants consider that no further mitigation measures or commitments are required.			
RI_B5	We advise that the Applicant adequately considers the potential for a four-year gap between the completion of the first project (i.e. Morgan) and the commencement of the second (i.e. Morecambe) for 'Construction Scenario 3b'. We advise the MDS is updated within the Project Description and relevant Chapters to account for this, taking into consideration the potential for the recovery of seabed species and habitats resulting in outdated baseline data. We also advise that the relevant impact assessments are updated and outcomes taken account of in named plans.		<p>The Applicants have submitted Rule 9 – ES assessment of Construction Scenarios (AS-070). This document details how a four year gap between projects within the sequential construction scenario has been assessed in the Environmental Statement. The MDS assessed within Volume 2, Chapter 1: Physical processes (APP-042) has taken due regard of the potential range of construction scenarios including sequential construction with a gap of up to four years. The MDS for physical processes was determined to be concurrent construction as the recovery between phases which is associated with sequential construction is deemed to be beneficial for coastal processes.</p> <p>The Applicants will update Volume 2, Chapter 1: Physical Processes (APP-042) for submission at Deadline 5 to include information outlining the justification of the concurrent scenario as the MDS for physical processes rather than the sequential scenario.</p>	No change.		The Applicants have updated Volume 2, Chapter 1: Physical processes (F2.1/F02) at Deadline 5 to include all additional clarifications/justifications provided in submissions at previous deadlines including information outlining the justification of the concurrent scenario as the MDS for physical processes rather than the sequential scenario.
RI_B6	It is not clear that the 9% and 10% total cable corridor values for sandwave clearance and cable protection respectively refer to the MDS requirements for each of the individual 6 cables (noting that each will have its own trench) or collectively. Similarly, clarity on the MDS specifications within and		The Applicants note that RI_B6 was resolved at Deadline 3.			

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	outside the Fylde MCZ should be provided. We advise that the MDS for construction and cable protection footprints are reviewed and updated where necessary across all ES chapters and named plans. And specific areas and volumes included for cable protection within and outside Fylde MCZ on the DCO/dML					
RI_B7	Natural England requires a plan showing the location of the proposed exit pits and Transmission Joint Bays (TJB) within the Application documents to be able to fully advise on the potential impacts of cabling under Lytham St Annes Dunes SSSI and St Annes Old Links Golf Course BHS.		The Applicants note that RI_B7 was resolved at Deadline 3.			
RI_B8	Natural England notes that the MDS for Pre-Lay Grapnel Run (PLGR), Unexploded Ordnance (UXO) clearance and boulder clearance have not been fully assessed within the ES Chapters. It is stated in the documents that "this is to prevent double counting of the seabed footprint parameters". However, there is no certainty that these activities will be undertaken at the same time or within the same footprint as the other site preparation activities especially the relocation of boulders. We advise the MDS figures for each of these activities should be presented in the Project Description and all		The Applicants recognised that within Natural England's guidance, UXO and boulder clearance are cited with respect to seabed habitats and species. During the EIA scoping phase, these impacts were scoped out of physical processes due to their limited temporal and spatial extents, however they have been assessed in the context of benthic habitats in Volume 2, Chapter 2: Benthic subtidal and intertidal ecology (APP-045). Natural England stated broad agreement with the approach to assessment for physical processes as presented at the EWG meeting on 30th March 2023 in response to the minutes of the meeting (APP-190) and did not request the assessment of UXO or boulder clearance with respect to physical processes within the PEIR consultation S42 responses (APP-187). For completeness further information regarding boulder clearance was provided in the Applicants response to RR-1601.B.15 (PDA-016), whilst information relating to UXO	No change.		The Applicants have updated Volume 2, Chapter 1: Physical processes (F2.1/F02) at Deadline 5 to include all additional clarifications/justifications provided in submissions at previous deadlines including information presented in these responses regarding UXO, pre-lay grapnel run and boulder clearance.

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	other relevant chapters in line with Natural England's Best Practice Guidance Phase III.		<p>clearance is provided in the Applicants response to RR-1601.B.14 (PDA-016).</p> <p>Additionally, the Applicants have provided a further explanation of the relationship between disturbance footprints for sandwave clearance, boulder clearance, UXO clearance and pre-lay grapnel run and the timing of activities in the Applicants response to Natural England response to ExQ1 against question 7.1.4. and against RI_C13 below.</p> <p>The Applicants will update Volume 2, Chapter 1: Physical Process (APP-042) for submission at Deadline 5 to include information presented in these responses regarding UXO, pre-lay grapnel run and boulder clearance.</p>			
RI_B9	We note that the MDS for sandwave clearance and seabed preparation is 1,426,900m ³ . However, this has not been broken down any further into individual activities, location, nor has a sandwave clearance impact width and length been provided and assessed. Natural England advises that the Applicant provides all the parameters associated with sandwave clearance and seabed preparation and the tools to be used for sandwave levelling to ensure the MDS and WCS have been assessed. This information should be included and updated within the ES Chapter and/or relevant named plan.		<p>The MDS for total spoil arising from construction activities (both sandwave clearance and cable installation) is broken down and presented in Table 1.14 of Volume 2, Chapter 1: Physical processes (APP-042). Seabed preparation relating to sandwave clearance and trenching for cable installation have broken down and assessed.</p> <p>The MDS assumes up to 1,426,800 m³ of spoil arising from sandwave clearance which is comprised of;</p> <ul style="list-style-type: none"> Morgan offshore export cable: sandwave clearance along 9% of 400 km of offshore export cable length with a width of 60 m. This equates to a total spoil volume of 1,080,000 m³ associated with the cable corridor. Morecambe offshore export cable: sandwave clearance along 9% of 84 km of offshore export cable length with a width of 48 m. This equates to a total spoil volume of 346,800 m³. <p>Furthermore, part of this total relates to volume sandwave clearance along 5% of the 64 km of Morgan offshore export cables within Fylde MCZ and 5% of the 24 km of Morecambe offshore export cable within Fylde MCZ. This equates to a spoil volume of 172,800 m³ for the Morgan offshore export cables within the Fylde MCZ and a total spoil volume of 97,200 m³ for the Morecambe offshore export cables within the Fylde MCZ. Sandwave clearance within the MCZ represents 3% of the total offshore export cable.</p>	No change.		The Applicants have updated the Outline Cable Specification and Installation Plan (J15/F03), Volume 1, Chapter 3: Project description (F1.3/F04), Volume 2, Chapter 1: Physical processes (F2.1/F02) and the Dredging and disposal - site characterisation plan (J22/F02) at Deadline 5 to remove reference to 'dredging' as a sandwave clearance method in the Fylde MCZ.

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			<p>Additionally, the MDS assumes up to 2,178,000 m³ of spoil arising from trenching for cable installation. Which is comprised of;</p> <ul style="list-style-type: none"> Morgan Offshore Wind Project Offshore export cables: Installation via trenching of up to 400 km of cable with a trench width of up to 3 m and a depth of up to 3 m. Total spoil volume of 1,800,000 m³. Of this, up to 64 km would be within the Fylde MCZ with a total spoil volume of 288,000 m³. Morecambe Offshore Windfarm: Installation of up to 84 km of cable with a trench width of up to 3 m and a depth of up to 3 m. Total spoil volume of 378,000 m³. Of this, up to 24 km would be within the Fylde MCZ with a total spoil volume of 108,000 m³ <p>As outlined in Table 1.14 of Volume 2, Chapter 1: Physical processes (APP-042), boulder clearance activities will result in minimal increases in suspended sediment concentrations due to seabed disturbance and these volumes were therefore not included in seabed preparation volumes.</p> <p>Therefore, the Applicants can confirm that the MDS has been correctly presented, and the impacts have been fully assessed.</p> <p>The Applicants would also highlight that within the Fylde MCZ, the Control Flow Excavator will be the only method used for sandwave clearance. The Applicants will update the Outline cable specification and installation plan (REP2-022), Project Description (REP2-008) and the Dredging and disposal - site characterisation plan (APP-227) at Deadline 5 to remove reference to 'dredging' as a sandwave clearance method in the Fylde MCZ.</p>			
RI_B10	Natural England advises that further assessment of the feasibility of the following cable installation tools: ploughing, jetting, mechanical cutting in shallow waters is required to support the worst-case scenario assessment for nearshore cable installation.		The Applicants have previously responded to this point in full in the Applicants' response to RR.1601.B.11 (PDA-016). The Outline Cable Burial Risk Assessment (OCBRA) (APP-219) confirms that the seabed geology and ground conditions within the Transmission Assets Order Limits is dominated by sandy and clay sediments. These sediments are characterised in the OCBRA as loose to dense sand and low to medium strength clay in shallow water depth (up to -14.23 m). Figure 5 of the Outline OCSIP (REP2-022) shows that ploughing, jetting and cutting are suitable techniques for	No change.		The Applicants have updated Volume 2, Chapter 1: Physical processes (F2.1/F02) at Deadline 5 to include all additional clarifications/justifications provided in submissions at previous deadlines to address Natural England's comments relating to the feasibility of cable installation in shallow waters.

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			<p>loose to dense sand and low to medium strength clay (soft to firm). Additionally, Figure 6 (APP-220) confirms that these techniques are suitable for offshore, nearshore, and beach areas. A combination of burial methods are likely to be adopted, with the OCSIP covering all necessary techniques to allow the appropriate method to be selected based on the expected sediment density and strength, ensuring the minimum burial depth is achieved. The information presented within the OCBRA (APP-219) and OCSIP (REP2-022) show that ploughing, jetting and cutting are suitable installation techniques for the sandy and clay sediment types found in shallow waters within the Transmission Assets Order Limits and a worst case scenario has been presented.</p> <p>The Outline CBRA (APP-219) was prepared by Royal HaskoningDHV who have a wealth of experience in undertaking CBRA's and the Applicants export cable installation project managers have a combined experience of over 50 years installing subsea cables, including selection of the appropriate burial tools / techniques in shallow water and/ or constructing new machinery to improve the efficiency of cable burial. As set out in the Outline CSIP (REP2-022), based on the site investigation data collected to inform the environmental impact assessment and engineering design, which included borehole and cone penetration test data, the Applicants are confident of the ability to install the offshore export cables using the identified installation tools of ploughing, jetting and cutting. The Applicants would also note that these installation methods have been used successfully on numerous offshore wind farm projects around the UK.</p> <p>As set out in the Outline CSIP (REP2-022) and included in the updated Commitments Register at Deadline 4 (F1.3.5/F05) the Applicants have committed to micro-siting of cable routes to areas with the greatest potential for burial success and lower likelihood of requiring cable protection and made significant reductions in cable protection provisions to reflect the confidence in successful cable burial.</p> <p>The Applicants will update Volume 2, Chapter 1: Physical Processes (APP-042) for submission at Deadline 5 to include all additional clarifications/justifications provided</p>			

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			in submissions at previous deadlines to address Natural England's comments relating to the feasibility of cable installation in shallow waters.			
RI_B11	a) Natural England advises that the worst case impacts from UXO clearance in relation to marine processes, including recovery is further assessed. b) Whilst the Applicant has stated UXO clearance activities may take place within Fylde MCZ; we advise that UXOs should be moved outside of the MCZ prior to detonation. The Applicant should demonstrate why they have not committed to this mitigation. This information should be included and updated within the ES Chapter and/or relevant named plans.		Please see the Applicant's response to RI_B8 above regarding the UXO clearance with respect to physical processes. With regards to the Fylde MCZ, the clearance of up to four UXOs within the Fylde MCZ was assessed in paragraph 1.8.2.22 of the MCZ Screening and Stage 1 Assessment Report (APP-019). It is not advised on safety grounds to move UXO prior to detonation if avoidable. Given that high order UXO detonation was removed from the draft DCO at Deadline 1 only localised disturbance is anticipated, which is discussed in more detail against 091.1 in the Applicants response to REP3-092 – Appendix C3 to Natural England's Deadline 3 Submission (S_D4_2.6)	In progress. In a meeting held with the Applicant on 22/07/24, the Applicant informed NE that they intend to submit further information regarding UXO clearance into Examination. We will therefore revisit this matter once the Applicant has submitted the relevant information into Examination.		The Applicants have updated Volume 2, Chapter 1: Physical processes (F2.1/F02) at Deadline 5 to include all additional clarifications/justifications provided in submissions at previous deadlines to address Natural England's comments relating to UXO clearance.
RI_B12	We advise that further information is provided by the Applicant on how seabed mobility has been considered with regards to cable protection requirements and locations in relation to this specific Application. This should be updated and included within the ES chapters (including those relating to landfall) and in the Outline CSIP.		The Outline CBRA (APP-219) details sub-seabed geology and ground conditions and Depth of Lowering for cable burial along the full length of the cable corridor. This includes seabed features such as sand wave height, wave length and mobile bedform height. The Outline CSIP (REP2-022) confirms that due to the sediment type found in the nearshore area and Fylde MCZ (i.e. predominantly sand and mud), traditional burial techniques are suitable to achieve the target burial depths and as per commitment CoT54 (REP3-013) identifies that cable burial is the preferred option for cable protection where practicable. The Applicants have provided a detailed response to this point in response to Natural England response to ExQ1 against question 7.1.6 (S_D4_2.6).	No change.		The Applicants have updated Volume 2, Chapter 1: Physical processes (F2.1/F02) at Deadline 5 to include all additional clarifications/justifications provided in submissions at previous deadlines to address Natural England's comments. The Applicants also submitted an Outline Landfall Construction Method Statement (AS-081) as an Additional Submission which was accepted at the discretion of the Examining Authority.

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RI_B13	It is unclear what the potential impacts may be for intertidal Direct Pipe installation, trenching, and temporary infrastructure (e.g. cofferdams) on seabed and coastal morphology, and how recovery of the landfall location will be secured. Natural England advise that (a) the Applicant should consider and assess all potential impacts to seabed morphology that may arise due to trenchless landfall works during the lifetime of the Projects. Including size and duration of installation of cofferdams and potential disruption to coastal processes. And (b) produce an Outline Landfall Method Statement and secure this in the DCO/dMLs. Natural England also advises further information is needed about the location of the export cables across the beach.		The Applicants have responded to this point in in response to Natural England's response to ExQ1 against question 7.1.4 (S_D4_2.6). The Applicants will prepare an outline landfall construction method statement to address Natural England's request. It has not been possible to prepare this in time for Deadline 4 and therefore the Applicants intend to submit this document into the examination in w/c 18 August 2025 (subject to the Examining Authority's acceptance).	No change.		The Applicants have submitted an Outline Landfall Construction Method Statement (AS-081) as an Additional Submission which was accepted at the discretion of the Examining Authority.
RI_B14	It is unclear in [APP-042] 1.10.4.1 what is meant my 'foreign material'. Natural England advises that the Applicant secures a commitment that no foreign material will be placed above the surface (winter beach levels), which could potentially interfere with sediment transport pathways. We advise that this is also secured in the DCO/DMLs.		Please see the Applicant's response to RI_B3, highlighting that commitment CoT114 (REP3-013) states that all permanent infrastructure located between Mean Low Water Springs (MLWS) and Mean High Water Springs (MHWS) will be buried to a target depth of 3 metres, subject to further pre-construction surveys to be reported within Detailed CBRAs. Moreover, a further commitment has made at Deadline 4 (F1.5.3/F05) which states that no permanent cable/scour protection shall be deployed in the intertidal between MLWS and MHWS.	In progress. In a meeting held with the Applicant on 22/07/24, the Applicant informed NE that they intend to include a commitment that relates to this issue at D4. We will therefore revisit this matter once the Applicant has submitted the relevant information into Examination.		The Applicants have updated Volume 2, Chapter 1: Physical processes (F2.1/F02) at Deadline 5 to include all additional clarifications/justifications provided in submissions at previous deadlines to address Natural England's comments relating to the landfall and to include reference to all new commitments made at previous deadlines.
RI_B15	Whilst we recognise that several cable protection types have been presented, no		Please see the Applicant's response to RI_B2 and RI_B3 above regarding the selection of	In progress. In a meeting held with the Applicant on 22/07/24, the Applicant informed NE that they intend to include a commitment that relates to this issue at D4.		The Applicants have updated Volume 2, Chapter 1: Physical processes (F2.1/F02) at Deadline 5 to include all new commitments made at previous deadlines.

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	commitment to using a specific cable protection has been made. Natural England advises the selection of cable protection should favour those engineering options which reduce potential impacts to marine processes and have the greatest likelihood of successful removal at decommissioning.		cable protection type and placement respectively.	We will therefore revisit this matter once the Applicant has submitted the relevant information into Examination.		
RI_B16	Natural England advises that an outline Construction Method Statement and outline CSIP are provided/updated as part of the consenting stage to demonstrate that the WCS has been assessed, and any predicted impacts can be sufficiently mitigated.		Please see the Applicant's response to RI_B13 above.	No change.		The Applicants have submitted an Outline Landfall Construction Method Statement (AS-081) as an Additional Submission which was accepted at the discretion of the Examining Authority. The Applicants have updated the Outline Offshore Cable Specification and Installation Plan (J15/F03) at Deadline 5 to limit sandwave clearance methods in the Fylde MCZ to Controlled Flow Excavator.
RI_B17	Natural England advises that surveys of the recoverability of the seabed, with a focus on sandwave reformation are undertaken to confirm predictions of recovery rates, and monitoring of the impacts of construction activities outside of Fylde MCZ on geomorphological receptors should be included for consideration in the Offshore In Principle Monitoring Plan (OIPMP).		It is noted that the Applicants are already committed to monitoring to observe the effect of sediment transport and sediment transport pathways on cable burial and ensure that cables remain buried and adequately protected. as detailed in the Offshore in-principle monitoring plan (oIPMP) (REP3-032). This would therefore encompass areas where sandwave clearance has been undertaken and changes in seabed morphology may occur. With regard to the intertidal area, it is also noted that a further commitment has been made by the Applicants at Deadline 4 stating that no cable/scour protection shall be permanently deployed in the intertidal area between MLWS and MHWS (CoT133, in the updated Commitments Register (F1.5.3/F05). Therefore, there will be no influence on coastal processes in the intertidal area and no need for monitoring at this location. Additionally, of relevance to Benthic subtidal and intertidal ecology, the Applicants also included a new commitment to benthic community recovery specific monitoring in the Fylde MCZ through pre and post construction benthic community sampling to monitor for	In progress. In a meeting held with the Applicant on 22/07/24, the Applicant informed NE that they intend to include a commitment that relates to this issue at D4. We will therefore revisit this matter once the Applicant has submitted the relevant information into Examination.		The Applicants would highlight that the OIPMP was updated at Deadline 4 (REP4-075), to include a new commitment to benthic community recovery specific monitoring in the Fylde MCZ through pre and post construction benthic community sampling to monitor for temporal and spatial recovery and of the potential colonisation by Invasive Non-Native Species (INNS) following construction activities within the Fylde MCZ. The Applicants have also updated Volume 2, Chapter 1: Physical processes (F2.1/F02) at Deadline 5 to include all additional clarifications/justifications provided in submissions at previous deadlines to address Natural England's comments relating to the nearshore environment and landfall and to include reference to all new commitments made at previous deadlines.

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			temporal and spatial recovery and the potential colonisation by INNS on and in the vicinity of any hard substrate in the Fylde MCZ within the Offshore IPMP at Deadline 4 (J20/F03). This is in-line with the approach adopted for the Morgan Generation Assets Project whereby monitoring data is also applicable to the observation of seabed recovery.			
RI_B18	Natural England do not agree with the Applicants conclusion of no likelihood of hindering the conservation objectives of Fylde MCZ which has been designated for subtidal sand and subtidal mud. Natural England consider that any placement of scour prevention/cable protection has the potential to disrupt sediment process which could disrupt marine processes and have a lasting impact on interest features over the lifetime of the project and beyond which is potentially irreversible.		Please see the Applicants' response to RI_B3 above with regards to placement of external cable protection in the nearshore and Fylde MCZ.	No change.		The Applicants have updated Volume 2, Chapter 1: Physical processes (F2.1/F02) at Deadline 5 to include all additional clarifications/justifications provided in submissions at previous deadlines to address Natural England's comments relating to the nearshore and Fylde MCZ and to include reference to all new commitments made at previous deadlines.
RI_B19	Natural England advises that the Project is likely to cause lasting impacts on benthic features within Fylde MCZ. Natural England have provided further advice on Fylde MCZ in Appendix I.		The Applicants note that RI_B19 was resolved at Deadline 2.			
RI_B20	We note that the physical processes assessment for Morgan and Morecambe Transmission Assets was undertaken using a conceptual modelling approach, based off of Mona Offshore Wind Project. The Applicant has stated this is due to the Transmission Assets being located within the			No change.		The Applicants provided the additional information requested by Natural England in their response to ExA Q7.1.6 in the Applicants' Response to Deadline 3 submissions from Statutory Consultees and other organisation: Natural England (REP4-100) submitted at Deadline 4. Furthermore, an updated Volume 2, Chapter 1: Physical Process has been submitted at Deadline 5 (F2.1/F02) to include this data and provides sufficient detail on the location and design of the cables and associated protection to determine that impacts for sediment transport pathways, including the pathway into the Ribble Estuary, are of

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	same geological formation as the Mona offshore export cable. Ideally, project specific numerical modelling of the impacts of cable protection in isolation should be undertaken to inform in-combination assessments for future projects.					<p>negligible to minor significance which is not significant in EIA terms.</p> <p>The Outline CBRA (APP-219) and the Outline CSIP (REP2-022) confirms that due to the sediment type and depth found in the nearshore area extending to the Depth of Closure and the Fylde MCZ (i.e. predominantly sand and mud), traditional burial techniques are suitable to achieve the target burial depths and commitment CoT54 (REP4-018) identifies that cable burial is the preferred option for cable protection where practicable. It is therefore not anticipated that external cable protection would be required in the nearshore and this is to be confirmed by pre-construction surveys.</p> <p>The Applicants also note that the conceptual approach was supported by a number of appropriate studies and modelling campaigns including detailed project specific morphological seabed study (included assessment of historical datasets and modelling (ABPmer 2023). The Applicants have submitted the ABPmer report (Annex to Applicants response to MMO and NE submission at Deadline 3: Assessment of Seabed Level Vertical Variability for Morgan Offshore Wind Farm - Appendix C) regarding the beach levels that underpin the assessment of the intertidal bed level trends (REP4-122) to support the information provided in the Outline CBRA (APP -219) and the Outline CSIP (REP2 - 022).</p>

3.5 Risk and Issues Log – Benthic Subtidal and Intertidal Ecology

Table 3-5: Responses to questions regarding Benthic Subtidal and Intertidal Ecology

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Risk and Issues Log Deadline 1 – Benthic Subtidal and Intertidal Ecology Taken from Natural England's Relevant and Written Representations Morgan and Morecambe Transmission Assets Appendix C - Benthic Subtidal and Intertidal Ecology						
RI_C1	Natural England advises that there are a number of potential impacts both on intertidal and subtidal benthic habitats which have not been adequately considered or assessed within the Environmental Statement (ES). The specifics of which are included in the points within this worksheet.		<p>The Applicants' position remains as outlined in RR-1601.C.1 of their response to Natural England (PDA-017) that all of the relevant potential impact pathways on intertidal and subtidal benthic habitats have been identified and assessed in Volume 2, Chapter 2: Benthic subtidal and intertidal ecology (APP-045) and in the Marine Conservation Zone Screening and Stage 1 Assessment Report (APP-019) with further details on construction scenarios provided in the Rule 9 – ES assessment of Construction Scenarios (AS-070).</p> <p>The Applicants also highlight their responses to comments RI_C7, RI_C8, RI_C10, RI_C11, RI_C13, RI_C14, RI_C15, RI_C16, RI_C17, RI_C18, RI_C19, RI_C20 and RI_C21 which address comments regarding the benthic subtidal and intertidal ecology maximum design scenario (MDS) and conclude that the assessments conducted have adequately considered the potential impact of the Transmission Assets on this receptor group.</p> <p>The Applicants have also provided a detailed response to the matter in response to Natural England's response to ExQ1 and question 7.1.4 in particular (S_D4_2.6).</p> <p>The Applicants will update Volume 2, Chapter 2: repo ecology (APP-045) and the MCZ Screening and Stage 1 Assessment Report (APP-019) for submission at Deadline 5 to include all additional clarifications / justifications provided in submissions at previous deadlines to address Natural England's comments relating to the MDS.</p>	In progress. In a meeting held with the Applicant on 22/07/24, the Applicant informed NE that intend to submit updated ES chapters with the inclusion of additional information at D5. We will therefore revisit this matter once the Applicant has submitted the relevant information into Examination.		The Applicants have updated Volume 2, Chapter 2: Benthic subtidal and intertidal ecology (F2.2/F02) and the MCZ Screening and Stage 1 Assessment Report (E4/F02) at Deadline 5 to include all additional clarifications/justifications provided in submissions at previous deadlines to address Natural England's comments relating to the MDS.
RI_C2	Natural England is concerned that MDS parameters are for cable protection to be installed at any point through the lifetime of the Project (including Operation and Maintenance), rather than the amount that will be required for the construction phase alone. Natural England advises that additional detail is needed on how the potential for the addition of further cable/scour protection during the O&M phase has been considered, and what proportion of the Maximum Design calculations for cable/scour protection the O&M		In response to Natural England's comments, the Applicants are including a new commitment in the Outline Offshore Operations and Maintenance Plan at Deadline 4 (J19/F02) to limit the development of cable/scour protection in the operations and maintenance phase to the first ten years / limit of the MDS (whichever is first) outside the Fylde MCZ and the first two years inside the MCZ. Finally, the Applicants have also made a commitment at Deadline 4 to no deployment of cable/scour protection in the intertidal area between MLWS and MHWS. The Applicants would highlight that this timing is required to allow for any 'snagging' / delays in construction phase deployment and to cover the Offshore Transmission Owner (OFTO) divestment period. Following this two year period, any	No change.		<p>The Applicants have updated Volume 2, Chapter 2: Benthic subtidal and intertidal ecology (F2.2/F02) and the MCZ Screening and Stage 1 Assessment Report (E4/F02) at Deadline 5 to include reference to all new commitments made at previous deadlines.</p> <p>The Applicants await feedback from Natural England on the commitments made at Deadline 4 relating to temporal limits on deployment of cable protection inside and outside the Fylde MCZ during the operations and maintenance phase (updated Outline Offshore Operations and Maintenance Plan, REP4-072), and commitment to no cable protection between MLWS and MHWS in the intertidal area (CoT133 in REP4-018).</p>

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	requirements account for both within and outside of the MCZ.		<p>further deployment of cable protection during the operation and maintenance phase within the Fylde MCZ would require a new marine licence application.</p> <p>The need for this two-year period is because offshore wind farm developers are only permitted to convey electricity over the transmission assets for a period of 18 months from the issue of a completion notice for the generation assets (also known as the 'commercial operation date' (COD). After this period, the offshore transmission assets must be divested to an offshore transmission asset owner (OFTO) who may require additional works to be undertaken. To continue to generate after 18 months from the completion notice is a criminal offence under the Electricity Act 1989.</p> <p>As requested by Natural England during a meeting on 22 July 2025, the Applicants have provided further clarification on the basis of the two-year period for deployment of further cable protection (up the MDS assessed) in the O&M phase and how that relates to the period between export cable installation and OFTO divestment, nothing that the divestment period would be associated with completion of construction of the Morgan / Morecambe Generation Assets. Natural England also advised that the Applicants need to set out how the benthic monitoring programme would ensure that deployment of additional cable protection in the two-year period would not affect the benthic monitoring programme.</p> <p>With regard to the first point on timing, the programme for construction of the Transmission Assets includes offshore export cable installation as the last activity in the construction programme for Morgan Transmission Assets and for Morecambe Transmission Assets, as set out in section 3.9.1 of the Project Description (REP2-080). This is partly because installation of the offshore export cables will need to align with the latter stages of the construction of the generation assets as the offshore export cables will need to connect to the offshore substation platforms. The basis for the two-year period is therefore the eighteen-month period for divestment of the transmission assets to the OFTO, plus a six-month period to mitigate the completion of the Transmission Assets up to six-months before completion of the Generation Assets.</p> <p>In addition to the monitoring already proposed for the recovery of sediments and seedbed features in the Fylde MCZ, the Applicants have updated the Offshore In Principle Monitoring Plan submitted at Deadline 4 (J19/F02) to also include a commitment to specific monitoring of the temporal and spatial recovery of benthic communities in the Fylde MCZ through pre and post construction benthic community sampling and of</p>			

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			the potential colonisation by Invasive Non-Native Species (INNS) following construction activities within the Fylde MCZ. The deployment of addition cable protection during the first two year of the operations and maintenance phase post-construction period will not affect the efficiency of the monitoring programme. The Applicants will ensure that sufficient stations are selected in the Fylde MCZ included in the monitoring programme to include for redundancy in the highly unlikely event that a station selected for the monitoring of the recovery of soft sediments from temporary disturbance is subject to the installation of cable protection during the first two year of the operations and maintenance phase. The Applicants will update Volume 2, Chapter 2: Benthic subtidal and intertidal ecology (APP-045) and the MCZ Screening and Stage 1 Assessment Report (APP-019) for submission at Deadline 5 to include reference to this new commitment.			
RI_C3	a) Natural England advises that the Project is likely to cause lasting impacts on benthic features within Fylde MCZ and that the sites 'maintain' conservation objectives will be hindered. b) Every effort should be made to reduce the impacts through the adoption of robust mitigation measures, including commitments to remove infrastructure at the decommissioning phase. c) We advise that the MCZ assessment should proceed to a stage 2 assessment and a without prejudice MEEB case provided.		The Applicants note that this issue was resolved at Deadline 2.			
RI_C4	Natural England advises that impacts to priority habitats under Section 41 of the NERC Act 2006 are avoided and where that is not possible due consideration is demonstrated. Particular consideration should be given to those which are most sensitive and/or listed as threatened/in decline under OSPAR.		Please see the Applicants' response to NE6.	Natural England welcomes the updated wording for micro-siting in the DCO under Schedules 14 and 15. However, we maintain that where it is not possible to avoid broadscale NERC habitats, the Applicant will need to demonstrate that impacts have been minimised as much as possible.		Please see the Applicants' response to NE6.
RI_C5	Natural England strongly advises that a commitment to remove all infrastructure associated with the development at decommissioning is secured in the DCO. This should be provided in an Outline Decommissioning Plan should also be provided as part of the consent		The Applicants responded previously to the points raised by Natural England within RR-1601.42 of their response to Natural England (PDA-014). As detailed in the Outline CSIP (REP2-022), the Transmission Assets design is considering multiple cable protection options. The Outline CSIP (REP2-022) identifies that cable burial is the preferred option for cable protection where practicable (CoT54) and should cable protection be	No change.		The Applicants provided a detailed response to this matter in response to Natural England's response to ExQ1 and question 7.1.5 in particular (REP4-100). The Applicants have also updated Volume 2, Chapter 2: Benthic subtidal and intertidal ecology (F2.2/F02) and the MCZ Screening and Stage 1 Assessment Report (E4/F02) at Deadline 5 to include reference to all new commitments made at previous deadlines.

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	phase to detail the approach to decommissioning.		<p>required within the Fylde MCZ, it will be designed to be removable (CoT108) with the requirement for removal agreed with stakeholders and regulators at the time of decommissioning (CoT109).</p> <p>Further to the Applicants' update to the outline CSIP submitted at Deadline 2 (REP2-022), which removed 'rock dump' from the list of cable protection types to be used within the Fylde MCZ, the Applicants have also included a commitment to 'no rock dumping within Fylde MCZ' in the Draft DCO submitted at Deadline 4 (C1/F06).</p> <p>The Applicants will update Volume 2, Chapter 2: Benthic subtidal and intertidal ecology (APP-045) and the MCZ Screening and Stage 1 Assessment Report (APP-019) for submission at Deadline 5 to include all updated commitments.</p> <p>The use of cable/scour protection, where required, will be evaluated and further considered post-consent in Detailed CSIPs, focusing on both engineering suitability and environmental recoverability. The CSIPs are part of the Offshore Construction Method Statements that are secured in the Draft DCO (AS-004) in:</p> <ul style="list-style-type: none"> • Condition 18(1)(e)(i) of Schedule 14 for the Morgan Offshore Wind Project: Transmission Assets; and • Condition 18(1)(e)(i) of Schedule 15 for the Morecambe Offshore Windfarm: Transmission Assets. <p>The Applicants will submit a draft decommissioning programme to the Secretary of State as required by the Energy Act 2004 prior to the commencement of construction which will include an assessment of the removal of cable/scour protection. This decommissioning programme will be updated throughout the assets' lifespan to incorporate changing best practice and new technologies.</p> <p>The Applicants have also provided a detailed response to the matter in response to Natural England's response to ExQ1 and question 7.1.5 in particular (S_D4_2.6).</p>			
RI_C6	Natural England notes that the Applicants current EIA assessment fails to consider or assess the potential pressures and impacts on the supporting benthic habitats for Special Protection Area (SPA) features, including Liverpool Bay SPA. Full consideration is required to inform a robust assessment of the likely impacts upon designated ornithological features.		To resolve this issue, the Applicants have agreed with NE to update the relevant sections of the Habitats Regulations Assessment Stage 2 Information to Support an Appropriate Assessment Part Three – Special Protection Areas (SPA) and Ramsar Site assessments (APP-107) for submission at Deadline 5 to include the additional clarifications information included in submissions at previous deadlines.	No change.		The Applicants have updated the relevant sections of the Habitats Regulations Assessment Stage 2 Information to Support an Appropriate Assessment Part Three – Special Protection Areas (SPA) and Ramsar Site assessments at Deadline 5 (E2.3/F02) to include the additional clarifications information included in submissions at previous deadlines.

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RI_C7	We advise that the Applicant adequately considers the potential for a four-year gap between the completion of the first project (i.e. Morgan) and the commencement of the second (i.e. Morecambe) for 'Construction Scenario 3b'. We advise the MDS is updated within the Project Description and relevant Chapters to account for this, taking into consideration the potential for the recovery of seabed species and habitats resulting in outdated baseline data. We also advise that the relevant impact assessments are updated and outcomes taken account of in named plans.		Please see the Applicants' response to RI_B5 above.	No change.		The Applicants have updated Volume 2, Chapter 2: Benthic subtidal and intertidal ecology at Deadline 5 (F2.2/F02) to include information outlining the justification of the relevant construction scenario for each impact pathway.
RI_C8	It is not clear that the 9% and 10% total cable corridor values for sandwave clearance and cable protection respectively refer to the MDS requirements for each of the individual 6 cables (noting that each will have its own trench) or collectively. Similarly, clarity on the MDS specifications within and outside the Fylde MCZ should be provided. We advise that the MDS for construction and cable protection footprints are reviewed and updated where necessary across all ES chapters and named plans. And specific areas and volumes included for cable protection within and outside Fylde MCZ on the DCO/dML		The Applicants note that RI_C8 was resolved at Deadline 2.			
RI_C9	Natural England notes that the cable protection types listed within the design envelope (Table 3.7) appear to be contradictory to the commitment for all cable protection to be removable from an environmental perspective. Due consideration should be given to the nature of the cable protection used and should favour those engineering options with the greatest likelihood of successful removal, from an environmental perspective, at the Projects' end of life.		Please see the Applicants' response to RI_C5 above.	In progress. In a meeting held with the Applicant on 22/07/24, the Applicant informed NE that they intend to include a commitment that relates to this issue at D4. We will therefore revisit this matter once the Applicant has submitted the relevant information into Examination.		Please see the Applicants' response to RI_C5 above.
RI_C10	a) Natural England advises that clarity is provided within the Application		The Applicants have responded to each of the points made by NE below. Additionally, under each point, any	In progress. In a meeting held with the Applicant on 22/07/24, the Applicant informed NE that they		The Applicants have updated the following chapters/reports at Deadline 5 to capture the relevant

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	<p>documents on the likely impacts from using Direct Pipe cable installation techniques. We advise that the following is provided and updated within the Application documents:</p> <ul style="list-style-type: none"> - Scour protection requirements at the direct pipe exit and/or entry locations; - Cable/scour protection requirements in the intertidal and subsequent mitigation; and - MDS for the sum of both projects for 'maximum cofferdam area dimensions' to be included in Tables 3.6 and 3.13. <p>b) We also advise that a landfall management plan should be provided in outline at the time of consent. All landfall impacts, including subtidal impacts, should be considered collectively to determine management/mitigation measures to ensure that significant impacts (both direct and indirect) are avoided to designated site features.</p>		<p>updates required to application documents at Deadline 5 are set out to ensure that Natural England and the Examining Authority are aware of what will be provided at Deadline 5, where relevant.</p> <p>Scour protection requirements at the direct pipe exit and in the intertidal</p> <p>With regards to the requirements for scour protection at the direct pipe exit and/or entry locations and cable/scour protection requirements in the intertidal, as outlined in the Applicants' response to RR.1601.C.11 (PDA-017), the Applicants have made a commitment (CoT114) to ensure that all permanent infrastructure (i.e. the offshore export cables) located between mean low water springs (MLWS) and mean high water springs (MHWS) will be buried to a target depth of 3 m. Further to this, the Applicants have included a clear commitment that no cable/scour protection shall be permanently deployed in the intertidal area between MLWS and MHWS in the Commitments Register submitted at Deadline 4 (CoT133; F1.5.3/F05).</p> <p>MDS for cofferdams</p> <p>With regards to Natural England's request for the sum of both projects for 'maximum cofferdam area dimensions' to be included in Tables 3.6 and 3.13, the Applicants have responded to this in full in the Applicants' response to RR.1601.C.11 (PDA-017). The maximum design parameters have not been provided for the sum of both projects in Tables 3.6 and 3.13 of Volume 1, Chapter 3: Project description (REP2-008) because only Morgan OWL or Morecambe OWL are able to undertake work on the beach at any given time as detailed in section 3.10.2 and section 3.14.5.15 of Volume 1, Chapter 3: Project description (REP2-008). The Applicants have made a commitment (CoT27) to remove temporary construction compounds (including cofferdams) and reinstate the site once construction has been completed. This is secured in Requirements 8 and 16 of Schedules 2A & 2B of the draft DCO (REP3-009). Therefore, cofferdams required by Morgan OWL and Morecambe OWL would not be constructed in the intertidal at the same time.</p> <p><i>Application document updates for Deadline 5:</i></p> <p>The explanation for the cofferdam MDS was set out in Annex 5.3 to the Applicants response to ISH1 Hearing Action Points (REP1-040). Therefore, the Applicants will update the Project Description and relevant ES chapters</p>	<p>intend to include a commitment that relates to this issue at D4. We will therefore revisit this matter once the Applicant has submitted the relevant information into Examination.</p>		<p>information/clarifications presented in the Applicants' response to Natural England's Deadline 3 submission (REP4-100) and all updated commitments:</p> <ul style="list-style-type: none"> • Volume 1, Chapter 3: Project description (F1.3/F04) • Volume 2, Chapter 2: Benthic subtidal and intertidal ecology (F2.2/F02); • Volume 2, Chapter 1: Physical processes (F2.1/F02); and • MCZ Screening and Stage 1 Assessment Report (E4/F02). • Stage 2 MCZ Assessment Report (S_D1_9/F02). • The Applicants also submitted an Outline Landfall Construction Method Statement into the examination at Deadline 4 at the discretion of the Examining Authority (AS-081).

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			<p>at Deadline 5 to ensure that the MDS for cofferdams is clear.</p> <p>Outline landfall management plan</p> <p>The Applicants have responded to this point in in response to Natural England response to ExQ1 against question 7.1.4 (S_D4_2.6) and against RI_B13 above. The Applicants will prepare an outline landfall construction method statement to address Natural England's request. It has not been possible to prepare this in time for Deadline 4 and therefore the Applicants intend to submit this document into the examination in w/c 18 August 2025 (which will be subject to acceptance by the ExA).</p> <p>The Applicants will update Volume 2, Chapter 2: Benthic subtidal and intertidal ecology (APP-045) and the MCZ Screening and Stage 1 Assessment Report (APP-019) for submission at Deadline 5 to include all additional clarifications / justifications provided in submissions at previous deadlines to address Natural England's comments relating to the MDS and to demonstrate that the MDS has been assessed.</p>			
RI_C11	Natural England advises that a further assessment of the feasibility of the cable installation tools in shallow waters is required to support the worst-case scenario assessment.		Please see the Applicants response to RI_B10 above. The Applicants have also provided a detailed response to the matter in response to Natural England's response to ExQ1 and question 7.1.4 in particular (S_D4_2.6).	No change.		The Applicants have updated Volume 2, Chapter 1: Physical Processes (F2.1/F02) and Volume 2, Chapter 2: Benthic subtidal and intertidal ecology (F2.2/F02) at Deadline 5 to include all additional clarifications/justifications provided in submissions at previous deadlines to address Natural England's comments relating to the feasibility of cable installation in shallow waters.
RI_C12	Natural England advises that storage options for material from the landfall exit pits and open cut trenching are explored to minimise impacts and allow for sufficient back filling.		<p>The Applicants have provided a detailed response to the point raised by Natural England, in regard to the use of excavated material, in RR-1601.B.20 (PDA-016) and RR-1601.C.13 (PDA-017).</p> <p>The storage of material excavated from the landfall exit pits and open cut trenching is only required for the short durations that the excavations are open, with the excavated material stored next to the exit pits and trenches. Once the cable ducts are installed, the exit pits will be backfilled with the excavated material; first with the subsoil, followed by the upper layers of sediment and land reinstatement back in its previous use, thereby maintaining existing shoreline characteristics and sediment transport processes. The Applicants have made a commitment (CoT44 of Volume 1, Annex 5.3: Commitments Register of the ES (AS-</p>	No change.		<p>The Applicants submitted an Outline Landfall Construction Method Statement into the examination at Deadline 4 at the discretion of the Examining Authority (AS-081) which addresses the matter of storage of material from landfall exit pits and backfilling.</p> <p>The Applicants have updated Volume 2, Chapter 1: Physical Processes (F2.1/F02) and Volume 2, Chapter 2: Benthic subtidal and intertidal ecology (F2.2/F02) at Deadline 5 to include all additional clarifications / justifications provided in submissions at previous deadlines to address Natural England's comments relating to installation activities in the intertidal.</p>

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			<p>030) that the landfall exit pits will exit the beach at least 100 m from the western boundary of the Lytham St. Annes Dunes SSSI. Works in the intertidal will most likely be undertaken at low tide utilising temporary cofferdams. The temporary cofferdams will provide a dry environment, allowing excavated sediment to be retained within the immediate area, ensuring minimal sediment loss. This is secured by Requirement 8 within Schedules 2A & 2B] of the draft Development Consent Order (AS-004). Detailed CoCP will be implemented by the Applicants as approved by Natural England, Environment Agency and the MMO for intertidal and offshore works, in consultation with relevant stakeholders, as appropriate.</p> <p>The use of cofferdams will enable direct backfilling of excavated material into the pit following cable installation, reducing the risk of sediment dispersion and eliminating the need for separate off-site or intertidal storage options.</p> <p>As set out in response to RI_C10 above, the Applicants will prepare an outline landfall construction method statement. It has not been possible to prepare this in time for Deadline 4 and therefore the Applicants intend to submit this document into the examination in w/c 18 August 2025 (which will be subject to acceptance by the ExA).</p> <p>The Applicants will update Volume 2, Chapter 1: Physical Processes (APP-042) Volume 2, Chapter 2: Benthic subtidal and intertidal ecology (APP-045) for submission at Deadline 5 to include all additional clarifications / justifications provided in submissions at previous deadlines to address Natural England's comments relating to installation activities in the intertidal.</p>			
RI_C13	Natural England notes that the MDS for Pre-Lay Grapnel Run (PLGR), Unexploded Ordnance (UXO) clearance and boulder clearance have not been fully assessed within the ES Chapters. There is no certainty that these activities will be undertaken at the same time or within the same footprint as the other site preparation activities especially in relation to boulder relocation. We advise that the MDS for PLGR, UXO clearance and boulder clearance are presented within the Project Description and all other relevant chapters in line with Natural		<p>The Applicants have responded to this point in full in the Applicants' response to RR.1601.B.9 (PDA-016) and RR.1601.C.14 (PDA-017) but reorganised the response below to aid in explaining the Applicants' position.</p> <ul style="list-style-type: none"> The MDS for sandwave clearance footprint is 9% of the Morgan offshore export cables and 9% of the Morecambe offshore export cables with a footprint width of 60 m for Morgan offshore export cables and 48 m for Morecambe offshore export cables. The MDS for pre-lay grapnel runs (PLGR) / boulder clearance does not include the areas where sandwave clearance has occurred as sandwave clearance would either remove the need for PLGR / boulder clearance, or those activities would occur within the disturbance footprint of sandwave clearance, i.e. sandwave clearance swathe is 60 m wide for Morgan cables and 48 m wide for 	In progress. In a meeting held with the Applicant on 22/07/24, the Applicant informed NE that they intend to submit updated ES chapters with the inclusion of additional information at D5. We will therefore revisit this matter once the Applicant has submitted the relevant information into Examination.		The Applicants have updated Volume 1, Chapter 1: Project Description (F1.3/F04) and Volume 2, Chapter 2: Benthic subtidal and intertidal ecology (F2.2/F02) and the Stage 2 MCZ Assessment Report (S_D1_9/F02) at Deadline 5 to include all additional clarifications / justifications provided in submissions at previous deadlines to address Natural England's comments relating to site preparation.

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	England's Best Practice Guidance Phase III.		<p>Morecambe cables centred on each offshore export cable route, whilst the swathe for PLGR / boulder clearance is 20 m wide centred on each offshore export cable route.</p> <ul style="list-style-type: none"> In the event that sandwave clearance is not required and boulder clearance is required along 100% of offshore export cables, then this remains within the MDS assessed as the width of disturbance for boulder clearance is 20 m and so well within the width of disturbance assessed for sandwave clearance. For the remaining 91% of the Morgan and Morecambe cables where sandwave clearance is not expected to be required, the MDS assumes repeat disturbance of the same 20 m wide swathe centred on each export cables route due to boulder clearance (by plough or grab) (PLGR and UXO clearance (if required) as set out in section 3.12.3 of the Project Description chapter (REP2-008)). Where a high density of boulders is seen, the expectation is that a boulder plough will be required to clear the installation corridor. Where medium and low densities of boulders are present, a sub-sea grab is expected to be employed. In either case, boulders will be side cast to the edge of the 20 m installation corridor. An assessment of temporary habitat disturbance from unexploded ordnance (UXO) clearance is provided in paragraph 2.11.2.37 of the Benthic subtidal and intertidal ecology chapter (APP-045). Low order UXO clearance would only be attempted for UXO found lying within the 20 m wide installation corridor (or up to 48 and 60 m for sandwave clearance over 9% of the export cable route as stated above). The Benthic subtidal and intertidal assessment established that for high order clearance, craters of up to 12.61 m are likely for up to 25 UXO clearance events. However, given that the Applicants have restricted to the draft DCO (REP3-009) to low order UXO clearance, any craters generated through clearance are expected to be significantly smaller than 12.61 m. <p>In summary,</p> <ul style="list-style-type: none"> Over 9% of the offshore export cable routes, the MDS is sandwave clearance, boulder clearance, PLGR and low order UXO clearance with sandwave clearance dictating the width of the installation corridor (up to 60 m for Morgan and 48 m for Morecambe). Over the remaining 91% of the offshore export cable routes, boulder clearance, PLGR and low order UXO 			

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			<p>clearance dictates the width of the installation corridor which is 20 m wide for all cables.</p> <p>Sandwave clearance, boulder clearance, PLGR and low order UXO clearance are likely to be undertaken at different times within the construction phase, which is why the Applicants have assessed these activities in the Benthic Subtidal and Intertidal Ecology chapter (APP-045) as 'repeat disturbance', but they would still be confined temporally to the overall discrete construction phase.</p> <p>The Applicants therefore consider that the assessment has been undertaken in accordance with section 7.2.2 of Natural England's Best Practice Guidance Phase III, which provides advice for specific aspects of an offshore wind farm which should be considered within the application including seabed preparation. Based on this advice all necessary aspects of seabed preparation have been considered (sandwave clearance, pre-lay grapnel run, boulder clearance and UXO clearance).</p> <p><i>Application document updates for Deadline 5:</i></p> <p>The information above is set out in both the Project Description chapter (REP2-008) (section 3.12.3) and the Benthic subtidal and intertidal ecology (APP-045) (section 2.9), however, the Applicants will update both chapters, and the Stage 2 MCZ Assessment (REP1-059) to include this additional clarification/justification.</p>			
RI_C14	Natural England advises that it is not clear how the MDS for sandwave clearance and seabed preparation has been derived. Natural England advises that the Applicant provides all the parameters associated with sandwave clearance and seabed preparation that were used to calculate the total MDS figure for 'sandwave clearance: offshore export cable (m3)' inside and outside of designated sites. These should be included and updated in the Project Description and the relevant Chapters in the ES to ensure that the impacts have been fully assessed.		Please see the Applicants response to RI_B9 above.	No change.		The Applicants have updated the Outline cable specification and installation plan (J15/F03), Volume 1, Chapter 1: Project description (F1.3/F04) and the Dredging and disposal - site characterisation plan (J22/F02) at Deadline 5 to remove reference to 'dredging' as a sandwave clearance method in the Fylde MCZ. Controlled flow excavation would be the only method used within the Fylde MCZ.
RI_C15	Natural England notes that the MDS sandwave clearance requirements stated are inconsistent between the Project Description [APP-024] and Benthic ES Chapter [APP-045] and named plans. No MDS figures for construction footprints have been		The Applicants confirm that Volume 2, Chapter 2: Benthic Subtidal and Intertidal Ecology (APP-045) will be updated in line with Table 1.1 of REP1-064 and will be submitted at Deadline 5.	In progress. In a meeting held with the Applicant on 22/07/24, the Applicant informed NE that they intend to submit updated ES chapters with the inclusion of additional information at D5. We will therefore revisit this matter once the Applicant has submitted the relevant information into Examination.		The Applicants have updated Volume 2, Chapter 2: Benthic Subtidal and Intertidal Ecology (F2.2/F02) at Deadline 5 in line with Table 1.1 of REP1-064.

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	presented within the Project Description. Natural England advises the maximum temporary construction footprints are reviewed and updated where necessary across the Application documents.					
RI_C16	Natural England notes that within the CSIP it is stated that the distance between the cable crossings means that there will be separation in cable protection (rock armouring/mattress) making one linear line of protection. Natural England is concerned about the potential physical processes and benthic impacts from this which have not been assessed. We also assume that because this protection would be considered as cable crossing it would be considered permanent. Natural England advises that cable crossing requirements and impacts are reassessed to ensure that the MDS/WCS has been assessed.		The Applicants note that RI_C16 was resolved at Deadline 3.			
RI_C17	Natural England is not clear how 14 cable repairs of a length of 56km has been determined. Currently as written, the cable repairs could be of any length. There is therefore a lack in consistency in WCS for cable repairs presented across the project description and named plans within and outside of designated sites. Natural England advises that clarification is provided by the Applicant on the maximum number of repairs per cable and in total, maximum length of each cable repair. Assessments and named plans should be updated accordingly.		<p>The Applicants have responded to this point in full in the Applicants' response to RR.1601.C.18 (PDA-017). In summary, the MDS for cable repairs is for:</p> <ul style="list-style-type: none"> Morgan export cable subtidal repairs: up to 4 km per event, with up to 14 subtidal cable repair events, over the lifetime of the assets (totalling 56 km). Morecambe export cable subtidal repairs: up to 4 km per event, with up to 7 subtidal cable repair events, over the lifetime of the assets (totally 28 km). <p>The parameters provided for cable repairs are aligned between Volume 1, Chapter 3: Project Description (REP2-008) and the Outline Offshore Operations and Maintenance Plan (APP-224).</p> <p>The Applicants will provide further detail regarding the basis for the MDS for each project at Deadline 5.</p>	No change.		<p>As set out in the Applicants response to RR.1601.C.18 (PDA-017) and to R1_C17 at Deadline 4 (REP4-100), 14 repair events totally 56km of subtidal export cable repairs is based on each of the 14 repairs being of a length of subtidal export cable of 4km (and likewise for Morecambe subtidal export cables where up to 7 repair events of up to 4km per event totals 28km). This is set out in Table 3.36 of Volume 1, Chapter 3: Project description (REP2-008). Therefore, it is not correct that cable repairs can be of any length as they are limited to up to 4km per event. This 'up to 4km per event' MDS is also set out in Table 2.12 (MDS) in Volume 2, Chapter 2: Benthic subtidal and intertidal ecology (APP-045), Table 1.1 of the Outline Offshore Operations and Maintenance Plan (REP4-072) and as a result, the Application documents and outline management plans are aligned.</p> <p>The basis for each repair event being up to 4km is explained in Table 3.36 of Volume 1, Chapter 3: Project Description (REP2-008) which states that when a fault in the subtidal export cable is detected it may be necessary to expose the export cable prior to recovery where testing will be conducted to establish the extent and type of repair required.</p>
RI_C18	Natural England does not agree with the statement that there was a "relatively low abundance of burrows overall" that "were not consistent with		With regards to Natural England's comments advising that the ES should be updated to accurately reflect the findings and conclusions of the technical report, the Applicants' position remains as outlined in RR-	No change.		The Applicants have updated Volume 2, Chapter 2: Benthic subtidal and intertidal ecology (F2.2/F02) at Deadline 5 to include all additional clarifications / justifications provided in submissions at previous

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	<p>a confident classification as the 'sea pen and burrowing megafauna communities'. We note that this statement is contradictory to the findings of the Technical Report [APP-046] which found burrows to be 'common' in some locations, and therefore more numerous than the 'frequent' threshold required to meet the OSPAR definition for 'sea pen and burrowing megafauna communities'. Natural England advises that (a) the ES is updated to accurately reflect the findings and conclusions of the technical report. And (b) where possible, impacts to these Features of Conservation Interest (FOCI) are minimised. To inform the updates Natural England also advises that the EIA should be updated, and appropriate sensitivity attributed to the benthic communities assessed as determined using MarESA.</p>		<p>1601.C.21 that a precautionary approach has been adopted which has assumed that the presence of burrows corresponds to the presence of the seapens and burrowing megafauna communities' habitat as defined by OSPAR. However, the wording in Volume 2, Chapter 2: Benthic Subtidal and Intertidal Ecology (APP-045) will be updated in line with the wording in Volume 2, Annex 2.1: Benthic subtidal and intertidal ecology technical report (APP-046), as requested by Natural England, and will be submitted at Deadline 5.</p> <p>With regards to Natural England's comments advising that the EIA should be updated, and appropriate sensitivity attributed to the benthic communities assessed as determined using MarESA, the Applicants' position remains as outlined in RR-1601.C.27. The approach taken is appropriate and sufficiently precautionary for the communities identified in the benthic ecology site-specific survey.</p> <p>The Applicants maintains that adjusting the sensitivity of the seapens and burrowing megafauna communities IEF from 'high' (as per the Marine Evidence based Sensitivity Assessment (MarESA); Hill et al. (2023)) to 'medium' is appropriate for the communities identified in the benthic ecology site-specific survey of the Transmission Assets. This is on the basis that the high sensitivity rating of this habitat in the MarESA is primarily driven by the fragile nature of seapens as an epifaunal species. The Applicants highlight that this approach is consistent with the approach adopted (i.e. tailoring the sensitivity of the seapens and burrowing megafauna communities receptor) in the benthic ecology chapters of the Morgan Generation Assets (Morgan Offshore Wind Ltd (2024) and the Morecambe Generation Assets (Morecambe Offshore Windfarm Ltd, 2024).</p> <p>Even if, as Natural England requests, a sensitivity of high were to be applied to the seapens and burrowing megafauna communities IEF, according to the matrix in Table 2.16 of Volume 2, Chapter 2: Benthic subtidal and intertidal ecology (APP-045), the range of significance would remain as minor to moderate. In this instance the Applicants would conclude that, on the basis of the intermittent nature of the impact over the construction phase, together with the absence of seapens (as above, none were identified through surveys) and the predicted resilience (i.e. recovery) of the key part of the community recorded in the Transmission Assets (i.e. the burrowing megafauna component of the habitat) which the MarESA states is medium, the significance would remain as minor adverse and so not significant in EIA terms.</p>			<p>deadlines to address Natural England's comments relating to the seapens and burrowing megafauna communities' habitat.</p>

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			The Applicants will update Volume 2, Chapter 2: Benthic Subtidal and Intertidal Ecology (APP-045) for Deadline 5 to capture the above.			
RI_C19	It does not appear that that the duration, nature or area of seabed impacts from UXO clearance has been quantified or assessed within the ES chapters. We therefore require evidence that seabed depressions from both UXO detonations and jack-up legs will back-fill with similar sediment type and over what duration. Natural England requires the Applicant to quantify and evaluate the worst-case impacts from UXO clearance and jack-up events.		<p>With regard to UXO clearance, please see the Applicants response to 092.1 in the Applicants response to Appendix C3 to Natural England's Deadline 3 Submission (S_D4_2.6) which covers this matter.</p> <p>With regard to jack-up vessels, jack-up footprint depressions would occur in sandy/loose material as the equipment is installed. On removal the depression would be partially infilled by gravity and then, over time, be infilled by the mobile seabed sediments. The extent of temporary depressions, following completion of jack-up operations, would be limited to the immediate area therefore, short term changes to bathymetry would have negligible impacts on tidal currents and sediment transport regimes. Monitoring at the Barrow offshore wind farm showed jack-up depressions associated with turbine installation were almost entirely infilled 12 months after construction (BOWind, 2008) noting that cable lay jack-up vessel proposed for the Transmission Assets has a much smaller footprint than that required for turbine installation. Although the monitoring study was undertaken during the first year of operation of Barrow Offshore Wind Farm (post construction monitoring initiated July 2006) it included oceanography, seabed morphology (scour etc.) and bathymetry. The wind farm is located in the east Irish Sea near Barrow-in Furness and therefore provides relevant, applicable datasets in compliance with regulatory standards.</p> <p>Additionally, of relevance to Benthic subtidal and intertidal ecology, the Applicants included a new commitment to benthic community recovery specific monitoring in the Fylde MCZ through pre and post construction benthic community sampling to monitor for temporal and spatial recovery and the potential colonisation by INNS on and in the vicinity of any hard substrate in the Fylde MCZ within the Offshore IPMP at Deadline 4 (J20/F03).The Applicants will update Volume 2, Chapter 2: Benthic subtidal and intertidal ecology (APP-045) and Volume 2, Chapter 1: Physical processes (APP-042), for submission at Deadline 5 to include all additional clarifications/justifications provided in submissions at previous deadlines to address Natural England's comments relating to UXO clearance.</p>	In progress. In a meeting held with the Applicant on 22/07/24, the Applicant informed NE that they intend to submit further information regarding UXO clearance into Examination. We will therefore revisit this matter once the Applicant has submitted the relevant information into Examination.		The Applicants have updated Volume 2, Chapter 1: Physical processes (F2.1/F02) and Volume 2, Chapter 2: Benthic subtidal and intertidal ecology (F2.2/F02) at Deadline 5 to include all additional clarifications / justifications provided in submissions at previous deadlines to address Natural England's comments.
RI_C20	Natural England advises that the ES Benthic Chapter [APP-045] is updated to consider impacts from		As outlined in the Applicants' response to RR-1601.C.23 (PDA-017) the MDS for impacts to benthic intertidal receptors has been fully assessed in section	In progress. In a meeting held with the Applicant on 22/07/24, the Applicant informed NE that they intend to submit updated ES chapters with the		The Applicants have updated Volume 2, Chapter 2: Benthic subtidal and intertidal ecology (F2.2/F02) and Volume 2, Chapter 1: Physical processes (F2.1/F02) at

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	construction of exit pits and/or cofferdam installation (where necessary) and associated site access and ancillary construction work areas. It has also not been stated whether or not scour protection may be required at the exit pit locations and whether any such requirements would be temporary or permanent.		<p>2.11.2 (in relation to temporary habitat loss/disturbance) and section 2.11.3 (in relation to increases in suspended sediment concentrations and associated deposition) of Volume 2, Chapter 2: Benthic subtidal and intertidal ecology (APP-045). Table 2.12 of Volume 2, Chapter 2: Benthic subtidal and intertidal ecology (APP-045) states that a combination of open cut trenching and marinised trenching represents the MDS for impacts to benthic intertidal receptors.</p> <p>The Applicants have made a new commitment at Deadline 4 as set out in the Commitments Register (F1.3.5 / F05) that no cable/scour protection will be permanently deployed in the intertidal zone between MLWS and MHWS. This would therefore include the cofferdams. The Applicants has also committed to preparing an outline landfall construction method statement which the Applicants will request to submit into the Examination in w/c 18 August 2025 in order that it can be fully reviewed by NE.</p> <p>The Applicants will update Volume 2, Chapter 2: Benthic subtidal and intertidal ecology (APP-045) and Volume 2, Chapter 1: Physical processes (APP-042), for submission at Deadline 5 to include the clarification that impacts from construction of exit pits and/or cofferdam installation are within the MDS assessed.</p>	inclusion of additional information at D5. We will therefore revisit this matter once the Applicant has submitted the relevant information into Examination.		<p>Deadline 5 to include the clarification that impacts from construction of exit pits and/or cofferdam installation are within the MDS assessed.</p> <p>Additionally, the Applicants updated the Commitments Register at Deadline 4 (REP4-018) to include a new commitment that no permanent cable/scour protection will be deployed between MLWS and MHWS (see CoT133).</p>
RI_C21	Natural England notes that open cut trenching is likely to be required for each of the 6 cables at landfall. However, it does not appear that the MDS duration, nature or extent of benthic and water quality impacts from open cut trenching has been quantified or assessed. Natural England advises that the EIA and where relevant, MCZ assessments and named plans are updated to consider these impacts including an update with accurate worst-case prediction values for Suspended Sediment Concentrations (SSCs) arising from trenching in the Export Cable Corridor (ECC).		<p>As outlined in the Applicants' response to RR-1601.C.24 (PDA-017) the Applicants can confirm that, as detailed in Table 2.12 of Volume 2, Chapter 2: Benthic subtidal and intertidal ecology (APP-045), the MDS for temporary habitat loss/disturbance to intertidal benthic receptors includes a 300 m long open cut trench for each of the six offshore export cables from the point that the trenchless techniques exit on the beach. The MDS also includes for marinised trenching for the remaining length of the intertidal area. Marinised trenching is a method of trenching which will be undertaken in the wet (i.e. rather than in the dry when the tide is out) which includes machine-instigated initiation of backfill of the trench to support natural backfill. Table 2.12 of Volume 2, Chapter 2: Benthic subtidal and intertidal ecology (APP-045) also explains that open-cut trenching represents the MDS for increases in suspended sediment concentrations and sediment deposition as a result of cable installation within the intertidal area. The Applicants confirm the MDS has been assessed.</p> <p>The Applicants will update Volume 2, Chapter 2: Benthic subtidal and intertidal ecology (APP-045) and Volume 2, Chapter 1: Physical processes (APP-042), for submission at Deadline 5 to include the clarification</p>	No change.		The Applicants have updated Volume 2, Chapter 2: Benthic subtidal and intertidal ecology (F2.2/F02) and Volume 2, Chapter 1: Physical processes (F2.1/F02) at Deadline 5 to include the clarification that impacts from construction of exit pits and/or cofferdam installation are within the MDS assessed.

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			that impacts from construction of exit pits and/or cofferdam installation are within the MDS assessed.			
RI_C22	Natural England notes that for cable landfall works there is a requirement for 2 x jack-up vessel deployments per cable out to KP10. Natural England queries how avoidance of benthic interest features and designated sites have been demonstrated? Natural England advises that as matter of best practice, the use of jack-up vessels should be excluded from benthic MPAs. Otherwise, clear justification as to why this is not possible and evidence of how impacts can be mitigated should be provided with evidence to support successful mitigation. a) We advise more detail and assessment is required regarding cable installation in shallow water depths below 11m in the ES Chapter and named plans. b) We also advise that an Outline Cable Landfall plan is provided and submitted into examination.		Regarding point 'a', the Applicants can confirm that the MDS assessed in Volume 2, Chapter 2: benthic subtidal and intertidal ecology (APP-045) already accounts for one jack-up event, in the subtidal, per cable within the Fylde MCZ to support export cable pull in at the landfall. The other jack-up will be outside of the Fylde MCZ between its east boundary and the intertidal area. As the assessment already assumes this no updates to the MDS are required but the Applicants will update Volume 2, Chapter 2: Benthic subtidal and intertidal ecology (APP-045) and the MCZ Screening and Stage 1 Assessment Report (APP-019) for submission at Deadline 5 to ensure that this is clear. With regards to Natural England's request for more detail and assessment regarding cable installation in shallow water depths, please see the Applicants' response to RI_B10 and RI_C11. With regards to point 'b' the Applicants has also committed to preparing an outline landfall construction method statement which, subject to acceptance by the ExA, will be submitted into the Examination in w/c 18 August 2025.	In progress. In a meeting held with the Applicant on 22/07/24, the Applicant informed NE that they intend to submit updated ES chapters with the inclusion of additional information at D5. We will therefore revisit this matter once the Applicant has submitted the relevant information into Examination.		The Applicants have updated Volume 2, Chapter 2: Benthic subtidal and intertidal ecology (F2.2/F02) and the MCZ Screening and Stage 1 Assessment Report (E4/F02) at Deadline 5 to include all additional clarifications / justifications provided in submissions at previous deadlines to address Natural England's comments.
RI_C23	Natural England strongly advises that the Applicant's commitments; CoT108 and CoT109 should include removal of all cable protection at the decommissioning phase within Fylde MCZ, rather than only stating it will be designed to be removable. This should be provided in an Outline Decommissioning plan.		Please see the Applicants' response to RI_C5.	No change.		The Applicants have updated Volume 2, Chapter 2: Benthic subtidal and intertidal ecology (F2.2/F02) and the MCZ Screening and Stage 1 Assessment Report (E4/F02) at Deadline 5 to include reference to all new commitments made at previous deadlines.
RI_C24	Natural England notes that dredge disposal activities including sandwave clearance will be conducted throughout the Transmission Assets Order Limits. We highlight that no commitments have been proposed to mitigate impacts either within or outside of benthic designated sites, with the exception of CoT116 which states immediately adjacent to the impact occurring to enable recovery. Natural England advises that mitigation measures should be adopted by the Applicant and the relevant documents updated		The Applicants can confirm that within the Fylde MCZ, the Control Flow Excavator will be the only method used for sandwave clearance. The Applicants will update the Outline Cable Specification and Installation Plan (CSIP) (REP2-022), Project Description (REP2-008) and the Dredging and disposal - site characterisation plan (APP-227) at Deadline 5 to remove reference to 'dredging' as a sandwave clearance method in the Fylde MCZ. As noted by Natural England, the Applicants have also made a commitment (CoT116 of Volume 1, Annex 5.3: Commitments Register of the ES (AS-030) to ensure that any material arising from sandwave clearance within the Transmission Assets Order Limits will be deposited in close proximity to the works. This is secured by paragraph 2(f) and Condition 16(4) within	No change.		The Applicants have updated the following documents at Deadline 5 to remove reference to 'dredging' as a sandwave clearance method in the Fylde MCZ: <ul style="list-style-type: none"> • MCZ Screening and Stage 1 Assessment Report (E4/F02); • Outline Cable Specification and Installation Plan (CSIP) (J15/F03); • Volume 1, Chapter 1: Project Description (F1.3/F04); • Volume 2, Chapter 2: Benthic subtidal and intertidal ecology (F2.2/F02); • Volume 2, Chapter 1: Physical processes (F2.1/F02); • Dredging and disposal - site characterisation plan (J22/F02); and

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	accordingly. More specifically, disposal options should be explored to ensure that sediment is deposited in areas of similar sediment character, adjacent and upstream of the levelling location, and using a fallpipe so that the risk of permanently altering the sediment character in any given location is minimised.		Schedules 14 & 15 of the draft Development Consent Order (REP 3-009). CoT116 and the methods highlighted in the Outline CSIP (APP-220) means that material will naturally be deposited locally in areas of similar sediment type. The Applicants note that it is not in their interests to move the sediment further than necessary from its original location and, therefore, consider that the Outline CSIP and existing commitment (CoT116) in addition to the new commitment to only restrict sandwave clearance, where required, in the Fylde MCZ to the Control Flow Excavator method should be sufficient to provide Natural England with the necessary comfort that sediment will be deposited in areas of similar sediment character.			<ul style="list-style-type: none"> MCZ Screening and Stage 1 Assessment Report (E4/F02).
RI_C25	Natural England welcomes the commitment to micro-site the cables to further reduce the need for cable protection. However, this is not included within the commitments log or secured so it can't currently be considered mitigation. Natural England advises that proposed mitigation measures are secured within a named plan or on the face of the DCO/dML.		The Applicants have updated the Commitments Register submitted at Deadline 4 (F1.5.3/F05) to include a commitment that, as part of the detailed design process, micro-siting of the offshore export cables within the corridors will be considered where successful burial could pose a challenge or where a higher risk of remedial works such as external cable protection may be required (see CoT134).	No change.		The Applicants have updated Volume 2, Chapter 2: Benthic subtidal and intertidal ecology (F2.2/F02) and the MCZ Screening and Stage 1 Assessment Report (E4/F02) at Deadline 5 to include reference to all new commitments made at previous deadlines.
RI_C26	Natural England does not agree with the 35 year duration which has been stated as the duration for which subtidal habitat loss will occur. Natural England advises that in the current absence of commitments to remove cable/scour protection, then the loss should be assessed as permanent. Natural England advises that the EIA should be updated with more appropriate descriptions of the timescales associated with impacts and assessment adjusted accordingly.		<p>The Applicants can confirm that permanent habitat loss/alteration, arising in the event that cable protection is not removed during the decommissioning phase, is assessed in paragraphs 2.11.5.22 <i>et seq.</i> of Volume 2, Chapter 2: Benthic subtidal and intertidal ecology (APP-045). Habitat loss arising during the O&M lifetime only (i.e. in the event that cable protection is fully decommissioned) is assessed in paragraphs 2.11.5.1 to 2.11.5.21 of Volume 2, Chapter 2: Benthic subtidal and intertidal ecology (APP-045).</p> <p>The Applicants will update Volume 2, Chapter 2: Benthic subtidal and intertidal ecology (APP-045) for submission at Deadline 5 to ensure that the wording around long-term and permanent habitat loss is clear.</p>	No change.		The Applicants have updated Volume 2, Chapter 2: Benthic subtidal and intertidal ecology (F2.2/F02) at Deadline 5 to ensure that the wording around long-term and permanent habitat loss is clear.
RI_C27	Natural England advises that the monitoring proposed within the Offshore In Principle Monitoring Plan (OIPMP) currently appears to focus on physical/sediment recovery and lacks sufficient ecological context. Natural England advises that the rationale within Table 1.3 of the OIPMP needs to be updated to		In addition to the monitoring already proposed for the recovery of sediments and seedbed features in the Fylde MCZ, the Applicants have updated the Offshore In Principle Monitoring Plan and submitted at Deadline 4 (J20/F02) to include a commitment to specific monitoring of the temporal and spatial recovery of benthic communities in the Fylde MCZ through pre and post construction benthic community sampling and of the potential colonisation by Invasive Non-Native	In progress. In a meeting held with the Applicant on 22/07/24, the Applicant informed NE that they intend to include a commitment that relates to this issue at D4. We will therefore revisit this matter once the Applicant has submitted the relevant information into Examination.		<p>The Applicants have updated Volume 2, Chapter 2: Benthic subtidal and intertidal ecology (F2.2/F02) at Deadline 5 to include the updated monitoring commitment outlined in the Offshore In Principle Monitoring Plan that was submitted at Deadline 4 (REP4-075).</p> <p>The Applicants would highlight that the Offshore In Principle Monitoring Plan (OIPMP) was updated at Deadline 4 (REP4-075), to include a new commitment to</p>

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	additionally include “temporal and spatial changes in benthic communities and their recoverability...” in order for the OIPMP to meet its objective.		Species (INNS) following construction activities within the Fylde MCZ. The Applicants will update Volume 2, Chapter 2: Benthic subtidal and intertidal ecology (APP-045) for submission at Deadline 5 to include this updated monitoring commitment.			benthic community recovery specific monitoring in the Fylde MCZ through both pre- construction and post-construction benthic community sampling to monitor for temporal and spatial recovery and of the potential colonisation by Invasive Non-Native Species (INNS) following construction activities within the Fylde MCZ.
RI_C28	From the information and figures presented ([APP-019] 1.8.2.31), it is not possible to determine whether the subtidal mud habitat type and NERC (2006) Priority habitat 'Burrowing megafauna communities' (as mapped in Figure 1.21 of the Benthic Technical report) overlap with the Fylde MCZ boundary. Site-specific benthic characterisation baseline should be presented together with the MCZ boundary in a single figure so that the habitats present can be checked against those assessed within the MCZ assessment report.		As outlined in paragraph A.1.5.2.6 of the Stage 2 MCZ Assessment (REP1-059), the seapens and burrowing megafauna habitat was identified at sample stations to the west of the Fylde MCZ (outside of its boundary). The station in closest proximity to the Fylde MCZ was located 86 m from the boundary. Although the extent of this habitat as displayed in Figure A.3 of the Stage 2 MCZ Assessment (REP1-059) indicates that it overlaps with the Fylde MCZ the sample station where the habitat was precautionarily identified lies outside the boundary of the Fylde MCZ and the area of overlap represents a precautionary buffer around this sample station where the seapens and burrowing megafauna habitat could occur. None of the sample stations within the Fylde MCZ were identified as representing the seapens and burrowing megafauna habitat and so mitigation is required in this regard. The Applicants will update the MCZ Screening and Stage 1 Assessment Report (APP-019) for submission at Deadline 5 to include the updated figure from REP1-059 and additional clarifications / justifications provided in submissions at previous deadlines to address Natural England's comments relating to the presence of the seapens and burrowing megafauna habitat within the Fylde MCZ.	No change.		The Applicants have updated the MCZ Screening and Stage 1 Assessment Report (E4/F02) at Deadline 5 to include the updated figure from REP1-059 and additional clarifications / justifications provided in submissions at previous deadlines to address Natural England's comments relating to the presence of the seapens and burrowing megafauna habitat within the Fylde MCZ.
RI_C29	Please see comments C28 – C33 regarding mitigation which are equally applicable to this section and Fylde MCZ.		With regards to Natural England's comments relating to mitigation please see the Applicants' response to RI_C4.	In progress. In a meeting held with the Applicant on 22/07/24, the Applicant informed NE that they intend to include a commitment that relates to this issue at D4. We will therefore revisit this matter once the Applicant has submitted the relevant information into Examination.		The Applicants have updated Volume 2, Chapter 2: Benthic subtidal and intertidal ecology (F2.2/F02) and the MCZ Screening and Stage 1 Assessment Report (E4/F02) at Deadline 5 to include reference to all new commitments made at previous deadlines.
RI_C30	Natural England advises that the adoption of mitigation measures via a Benthic Mitigation Plan, and associated monitoring in the Offshore In-Principle Monitoring Plan are further considered in order that impacts (particularly permanent loss), on the more sensitive Section 41 Habitats are avoided and/or reduced wherever feasible through mitigation measures such as micro-siting.		During a meeting between the Applicants and Natural England on 22 July 2025, this matter was discussed, where the Applicants explained its position that a commitment to avoid the most sensitive and or priority habitats designated under Section 41 of the NERC Act 2006 was justified or required due to the Applicants having taken all reasonable measures (via project design changes and commitments) to minimise impacts to all benthic habitats, including habitats of principal importance. Natural England advised the Applicants to set out its case clearly demonstrating how the mitigation hierarchy has been applied and the commitments made,	In progress. In a meeting held with the Applicant on 22/07/24, the Applicant informed NE that they intend to submit an update to their IPMP that relates to this issue at D4. We will therefore revisit this matter once the Applicant has submitted the relevant information into Examination.		The Applicants have updated Volume 2, Chapter 2: Benthic subtidal and intertidal ecology (F2.2/F02) at Deadline 5 to include the updated monitoring commitment outlined in the Offshore In Principle Monitoring Plan that was submitted at Deadline 4 (REP4-075).

ID	Risk and Issue Log comment	RAG Status Rel and WR Rep and D1	Applicants' comment at Deadline 4 (in response to NE D3 submission)	Natural England's Comments/Update on Progression at Deadline 4	RAG D4	Applicants' comment at Deadline 5 (in response to NE D4 submission)
			which the Applicants have set out within the Applicants' response to RI_C4, With regards to Natural England's comments relating to benthic monitoring commitments please see the Applicants' response to RI_C27.			

3.6 Risk and Issues Log – Fish and Shellfish Ecology

Table 3-6: Responses to questions regarding Fish and Shellfish Ecology

ID	Risk and Issue Log comment	RAG Status Rel and WR Rep and D1	Applicants' comment at Deadline 4 (in response to NE D3 submission)	Natural England's Comments/Update on Progression at Deadline 4	RAG D4	Applicants' comment at Deadline 5 (in response to NE D4 submission)
Risk and Issues Log Deadline 1 – Fish and Shellfish Ecology Taken from Natural England's Relevant and Written Representations Morgan and Morecambe Transmission Assets Appendix D - Fish and Shellfish Ecology						
RI_D1	Natural England do not agree that smelt should be screened out. There is potential for EMF to cause barrier effects that hinder smelt movements in and out of the estuary. Minimum and maximum target burial depths between 0.5 m and 3 m are detailed for the marine component. The Applicant should provide further detail on proposed cable depth below the riverbed and detail pertaining to EMF from the cable below the Ribble Estuary MCZ and this should be used to appropriately assess EMF impacts.		The Applicants acknowledge the uncertainties associated with electromagnetic field impacts on fish species including smelt. However, little uncertainty exists concerning the physical dissipation of EMFs with increasing distance from the cable, as set out in section 3.11.7 of Volume 2, Chapter 3: Fish and shellfish ecology (APP-048). As the cables across the Ribble Estuary will be buried to depths of 7-45 m, there will be no detectable EMF emissions into the Ribble Estuary beyond natural background levels. Therefore, the proposed monitoring is not justified or proportionate to the negligible risk of EMF emissions causing barrier effects to smelt at the Ribble Estuary crossing.	No change.		The Applicants' position remains the same as at Deadline 4, with this reiterated in the Issue Specific Hearing Day 2 submissions (REP4-104, comments 5(b)(i) 19-22). The Applicants highlighted the increased value of broader industry work streams on EMF monitoring instead of project-specific monitoring and are actively engaged with the Crown Estate to advance this area of research. The MMO and Environment Agency raised no concerns on this point.
RI_D2	Natural England recommend that an assessment of the long-term loss of seabed habitat that potentially supports prey species for the ornithological features of Liverpool Bay SPA is included. This should be based on an assessment of the area of suitable spawning and other supporting habitat for prey species (sandeel) that could be lost due to the construction of the cable corridor. The MDS states that cable protection will be designed to be removable, however there is no commitment to remove upon decommissioning. Sandeel exhibit high site fidelity and leaving cable covering in situ during decommissioning phase would be considered permanent habitat loss. Natural England also advises that the Applicant commit to removing all cable protection within Fylde MCZ at the time of decommissioning or assess permanent habitat loss of supporting prey species for Liverpool Bay SPA.		The Applicants welcome the comment from Natural England that the response has resolved this issue. The Applicants have committed to update information in HRA Stage 2 Information to Support an Appropriate Assessment Part Three (APP-017) at Deadline 5.	No change - we look forward to sight of updated documents.		The Applicants have submitted an updated Habitats Regulations Assessment Stage 2 Information to Support an Appropriate Assessment Part Three – Special Protection Areas (SPA) and Ramsar Site assessments at Deadline 5 (E2.3/F02).
RI_D3	There is potential for permanent habitat loss for sandeel and herring resulting from UXO and jack up barges altering sediment compositions. It is not clear		The Applicants note the comments from Natural England. However, as outlined in Volume 2, Chapter 3: Fish and shellfish ecology, section 3.11.2 (APP-048), evidence	No change.		The Applicants' position remains the same, in that UXO and jack up barge impacts on sediment composition are assessed as temporary habitat loss due to the recovery to baseline conditions within a relatively short time period following

ID	Risk and Issue Log comment	RAG Status Rel and WR Rep and D1	Applicants' comment at Deadline 4 (in response to NE D3 submission)	Natural England's Comments/Update on Progression at Deadline 4	RAG D4	Applicants' comment at Deadline 5 (in response to NE D4 submission)
	whether this has been assessed. UXO clearance and jack up barges need assessing for effects from permanent habitat loss on sandeel and herring.		<p>indicates that depressions recover to baseline conditions typically within one to three years, and as such this impact will be temporary, with no lasting changes to sediment/substrate types. With the removal of high order UXO clearance, any potential disturbance to seabed sediments would be further reduced from that assessed within the EIA.</p> <p>The Applicants would also note that as outlined in Volume 2, Annex 3.1: Fish and shellfish ecology technical report (APP-049), there are no suitable herring spawning habitats within the Transmission Assets boundary, and therefore the potential impacts are minimal. While there are limited areas of suitable sandeel habitats within the Transmission Assets boundary, as set out in Volume 2, Chapter 3: Fish and shellfish ecology section 3.11.2 (APP-048), the sandy sediments which characterise sandeel habitats are the sediment type that most readily recovers following seabed disturbance (e.g. from jack up footprints, UXO clearance or any other construction activities). As such, there will be no permanent effects on sandeel or herring spawning habitat as a result of these activities.</p> <p>See also the Applicants response to 092.1 in response to Appendix C3 to Natural England's Deadline 3 Submission (S_D4_2.6).</p>			cessation of construction activities. Further detail has been provided on the spatial extent and infilling of craters in Volume 2, Chapter 2: Benthic subtidal and intertidal ecology (F2.2/F02) at Deadline 5, with no change to the assessment conclusions.
RI_D4	Natural England defers to CEFAS on survey data acquisition, data sources, assessment methodology and its conclusions in relation to herring and sandeel. Natural England advises the Applicant refer to CEFAS comments as advisors to the MMO on this matter.					
RI_D5	It is unclear whether all relevant pathways have been assessed and/or quantified. Where relevant, the calculations for temporary and/ or permanent habitat loss impacts need to be considered with regards to suitable habitat for sandeel and herring. Natural England advise that full consideration of the likely nature, extent, duration, and significance of impacts upon SPA supporting habitats		The Applicants welcome the comment from Natural England that the response has resolved this issue. The Applicants have committed to update information in HRA Stage 2 Information to Support an Appropriate Assessment Part Three (APP-017) at Deadline 5.	No change.		The Applicants have submitted an updated Habitats Regulations Assessment Stage 2 Information to Support an Appropriate Assessment Part Three – Special Protection Areas (SPA) and Ramsar Site assessments at Deadline 5 (E2.3/F02).

ID	Risk and Issue Log comment	RAG Status Rel and WR Rep and D1	Applicants' comment at Deadline 4 (in response to NE D3 submission)	Natural England's Comments/Update on Progression at Deadline 4	RAG D4	Applicants' comment at Deadline 5 (in response to NE D4 submission)
	is required to inform a robust assessment of the likely impacts upon designated ornithological features and in turn prey species.					
RI_D6	Natural England largely agree with justification for in-combination assessment impacts for UXO and EMF but see comments D10 & D11 for further consideration.		The Applicants would refer Natural England to the Applicants' response to RI_D3 and has nothing further to add.	No change.		The Applicants welcome the agreement from NE.
RI_D7	Natural England do not agree with the statement that smelt have been shown to habituate to anthropogenic noise sources. There is little evidence to support this. The Applicant should provide more robust evidence to support this conclusion or remove the statement.					

3.7 Risk and Issues Log – Marine Mammals

Table 3-7: Responses to questions regarding Marine Mammals

ID	Risk and Issue Log comment	RAG Status Rel and WR Rep and D1	Applicants' comment at Deadline 4 (in response to NE D3 submission)	Natural England's Comments/Update on Progression at Deadline 4	RAG D4	Applicants' comment at Deadline 5 (in response to NE D4 submission)
Risk and Issue Log Deadline 1 – Marine Mammals Taken from Natural England's Relevant and Written Representations Morgan and Morecambe Transmission Assets Appendix E - Marine Mammals						
RI_E1	Natural England note that UXO clearance is included as a licenced activity in the DCO/marine licence (which includes high order clearance). This is a live issue for some projects in the consenting process (Mona OWF and Morgan OWF) and it is also applicable for the Transmission Assets. We strongly advise that a separate marine licence is sought for UXO clearance due to the lack of information available regarding the size, type and number etc of UXO that will require clearance and the over precaution that must be incorporated into the impact assessment at this stage. Without further information on what size of devices will proceed to clearance stage, the assessment (and associated mitigation protocols) must consider the worst-case scenario presented. Natural England advise that UXO clearance should be authorised under a standalone marine licence post consent and removed from the draft DCO.		The Applicants note the comment and the position taken by Natural England on this point; however it is the Applicants' position that it is appropriate and justified to include UXO clearance (limited to low order clearance) activities within the draft DCO (REP3-009). The Applicants have included all necessary activities for the construction and operation and maintenance of the Transmission Assets in the application for development consent, to ensure a comprehensive application, and all such activities have been subject to a robust assessment process. This includes UXO clearance activities, with suitable mitigation secured (Outline Marine Mammal Mitigation Protocol (REP2-026) and a commitment to not clearing UXO within the Liverpool Bay SPA between Nov – Mar (inclusive) as set out under CoT130 in Commitments Register (REP3-013)). Including only low order UXO clearance activities within the draft DCO, and appropriate controls under Condition 20 of Schedules 14 and 15 (REP3-009) is intended to remove the need to apply for and obtain a further licence post-consent and prior to construction, assisting with the expeditious delivery of the Transmission Assets project, contributing to UK Government targets for Net Zero. This is consistent with the approach taken for the Morgan Generation project and the recently consented Mona Offshore Wind Project.	No change. Natural England's updates at Deadline 2 and Deadline 3 are also applicable here.		The Applicants position remains the same as at Deadline 4. The Applicants position is aligned with the Morgan Generation Assets, noting that the Secretary of State retained clearance of UXO by low order methods in the recently made Order for Morgan Generation Assets.
RI_E2	Natural England have outstanding concerns on the assessment methodology. We see the issues as follows: • Dual effect categories in the assessment matrix where in certain cases non-significant and significant effects can result from the same combination of magnitude and sensitivity. It is generally accepted that the assessment should follow the precautionary principle thus further justification is needed when lower effect categories are chosen. Or, ideally, dual categories in the matrix should be		The Applicants believe that a robust response was provided within RR-1601 1601.E.2 (PDA-019) and request that further information on outstanding concerns is provided. With reference to Natural England's Relevant Representation (RR) on dual effect categories, the Applicants confirm that where a magnitude of impact and sensitivity of receptor result in the potential for two different conclusions of significance (e.g. Minor or Moderate) (as set out in Table 4.16 of Volume 2 Chapter 4: Marine mammals (APP-050)), justification has been provided for the conclusion of significance that	No change.		The Applicants position remains the same as at Deadline 4. Firstly, in that where a magnitude of impact and sensitivity of receptor result in the potential for two different conclusions of significance (e.g. Minor or Moderate) (as set out in Table 4.16 of Volume 2 Chapter 4: Marine mammals (APP-050)), justification has been provided for the conclusion of significance that has been reached. Secondly, the Applicants consider that the conclusions of magnitude and significance, with reference to assessment terminology (as presented within Volume 2, Chapter 4: Marine mammals (APP-050)) are appropriate and proportionate.

ID	Risk and Issue Log comment	RAG Status Rel and WR Rep and D1	Applicants' comment at Deadline 4 (in response to NE D3 submission)	Natural England's Comments/Update on Progression at Deadline 4	RAG D4	Applicants' comment at Deadline 5 (in response to NE D4 submission)
	<p>avoided.</p> <ul style="list-style-type: none"> Terminology used to base the conclusions of the assessment is not defined thus there is uncertainty as to what spatial or temporal scale terms such 'short term', 'medium term', long term', "temporary", "small scale", "regional", 'highly localised' mean. <p>Natural England advises the assessment methodology be revised and the assessment updated accordingly.</p>		<p>has been reached. Firstly, the Applicants highlight that for the impacts assessed in Volume 2 Chapter 4: Marine mammals (APP-050), there is no scenario identified where the dual effect category could have resulted in either a non-significant or significant effect; where a dual effect category did occur the magnitude of impact and sensitivity of receptor combinations either resulted in two non-significant categories (e.g. Negligible or Minor) or two significant categories (Moderate or Major). The approach to dual effect categories is detailed in Volume 2 Chapter 4: Marine mammals (APP-050), in cases where a dual significance of effect potential occurs from the same combination of magnitude and sensitivity, the final significance is based upon the topic expert's professional judgement as to which outcome delineates the most likely effect, with a clear explanation as to why this is the case (see paragraph 4.10.4.2 of Volume 2 Chapter 4: Marine mammals (APP-050)). The final conclusion of significance is based upon a realistic worst-case scenario for each impact and therefore the precaution is inherent in the approach to the assessment.</p> <p>Two examples have been set out below: Example 1 (two non-significant categories): for all species, for the impact of behavioural disturbance from elevated underwater sound during UXO clearance, the magnitude of the impact was deemed to be low, and the sensitivity of the receptor was considered to be low (as set out in paragraph 4.11.2.55 of Volume 2, Chapter 4: Marine mammals (APP-050)). Volume 2, Chapter 4: Marine mammals (APP-050) set out that there is not anticipated to be any effect on the international value of these species. The conclusion of significance, in line with the approach set out by the matrix, could have been concluded to be either negligible or minor adverse (a dual effect category), however a precautionary conclusion of minor adverse was adopted due to evidence of potential for an effect. Therefore, in response to NE's submission, the evidence supported the selection of the more precautionary (the higher effect) of the two significance categories. Example 2 (two significant categories): for the impact of injury from elevated underwater sound during UXO clearance, for Very High Frequency (VHF) cetaceans (e.g. harbour porpoise), the magnitude of the impact was deemed to be</p>			<p>The Applicants believe that a robust response was provided within RR-1601 1601.E.2 (PDA-019) and request that further information on outstanding concerns is provided.</p> <p>Additionally, the Applicants would highlight that an updated version of Volume 2, Chapter 4: Marine Mammals (F2.4/F02) has been submitted at Deadline 5, to reflect that high order UXO has been removed from the DCO.</p>

ID	Risk and Issue Log comment	RAG Status Rel and WR Rep and D1	Applicants' comment at Deadline 4 (in response to NE D3 submission)	Natural England's Comments/Update on Progression at Deadline 4	RAG D4	Applicants' comment at Deadline 5 (in response to NE D4 submission)
			<p>medium for harbour porpoise and the sensitivity of the receptor was considered to be high, and there was considered to be no change to the international value of the species assessed (as set out in paragraph 4.11.2.53 of Volume 2 Chapter 4: Marine mammals (APP-050)). The conclusion of significance, in line with the approach set out by the matrix, could have been concluded to be either moderate adverse or major adverse (both significant in EIA terms) (a dual effect category), however a conclusion of moderate adverse was adopted, on the basis that "Whilst there may be some residual effect with a small number of animals potentially exposed to sound levels that could elicit PTS, based on expert judgement it is considered that this would not manifest to population level effects." Therefore, in response to Natural England's submission, the evidence supported the selection of the lower effect category, and justification was provided on why the more precautionary of the two significance categories was not selected. In response to Natural England's submission that "ideally, dual categories in the matrix should be avoided", the matrix approach is a recognised and accepted approach for EIA (Volume 1, Chapter 5: Environmental Assessment Methodology (APP-034) and in Volume 2 Chapter 4: Marine mammals (APP-050)). This matrix approach is used, together with professional judgement, to evaluate the significance of effect. The flexibility in the matrix table, including the dual effect options, is necessary to allow the approach to be tailored to each topic, whilst retaining consistency across the ES. The magnitude and sensitivity tables are tailored specifically to marine mammals, to underpin the assessment and provide quantitative metrics, where possible, that allow a robust conclusion of significance to be reached. With reference to Natural England's RR on assessment terminology, interspecific differences in life history make it difficult to define short, medium, and long term within the magnitude tables. However, definitions have been provided for long term, medium term and short within the Glossary of Volume 2, Chapter 4: Marine mammals (APP-050). The phrase very short term was also used in relation to UXO clearance only, given that the duration of impact (elevated sound) for each UXO clearance occurs over a matter of seconds. In addition, the temporal scale of the impact is described in the</p>			

ID	Risk and Issue Log comment	RAG Status Rel and WR Rep and D1	Applicants' comment at Deadline 4 (in response to NE D3 submission)	Natural England's Comments/Update on Progression at Deadline 4	RAG D4	Applicants' comment at Deadline 5 (in response to NE D4 submission)
			text under each magnitude section and relates to the lifespan of a particular species. Similarly, spatial scale is also referred to in more detail within the text in the magnitude section. Where possible a quantitative value is given (i.e. a range of effect in metres or kilometres) otherwise a qualitative description applies (e.g. 'localised to within the close vicinity of the respective projects' or collision risk which occurs 'within close vicinity' to the vessel). A measure of the temporary nature of effects is also described here (e.g. UXO clearance events result in a very short duration of sound emission (seconds)). Therefore, the Applicants consider that the conclusions of magnitude and significance, as presented within Volume 2, Chapter 4: Marine mammals (APP-050) are appropriate and proportionate. Finally, the Applicants highlight that the assessment of significance for PTS was based on the MDS of high order UXO clearance, however the Applicants have committed to the use of low order clearance only. Please see responses to RR-1601.37 regarding the removal of high order UXO clearance from the draft DCO (including DMLs) (AS-004) and RR-1601.E.1 regarding the updates to the Outline MMMP to focus on low order UXO clearance (APP-223).			
RI_E3	The effective range of ADDs for harbour porpoises is 7.5 km approximately (JNCC 2022). The Applicant needs to outline how they plan to mitigate the rest of the estimated injury zone up to 15.37 km for high order UXO clearance activities. It is not clear what other measures the Applicant will commit to in order to mitigate for the full injury zone. The Applicant should provide further information on mitigation options for the entire harbour porpoise injury zone from high order UXO clearance for the alone and cumulative effect assessment (CEA).		The Applicants confirm that they intend to update the Volume 2, Chapter 4: Marine Mammals Chapter (APP-050) to align with the changes related to the impact of Injury and disturbance from elevated underwater sound during UXO clearance made at Deadline 6 for the Morgan Offshore Wind Farm: Generation Assets, as requested by Natural England at Deadline 2. An updated Marine Mammals Chapter will be submitted at Deadline 5.	In progress. Natural England welcomes the removal of high order UXO from the outline MMMP [REP2-027]. We advise that the Applicant should submit an updated version of the Marine Mammal Chapter into Examination to reflect that high order has been removed from the DCO. Provided that an updated Marine Mammal Chapter is submitted into Examination to reflect the removal of high order UXO detonation, we believe this issue will be readily resolvable.		The Applicants confirm that an updated version of Volume 2, Chapter 4: Marine Mammals (F2.4/F02) has been submitted at Deadline 5, to reflect that high order UXO has been removed from the DCO and to align with the changes related to the impact of Injury and disturbance from elevated underwater sound during UXO clearance made at Deadline 6 for the Morgan Offshore Wind Farm: Generation Assets (Morgan Generation Assets examination Library REP6-031), as requested by Natural England at Deadline 2 for the Transmission Assets (REP-062).
RI_E4	Natural England does not support use of scare charges for UXO clearance, and we advise that this measure is not considered in the final Marine Mammal Mitigation Protocol (MMMP). Remove the use of scare charges for UXO clearance from the final MMMP.		Please see the Applicants' response to RI_E3. These changes include the removal of references to deterrence using 'soft start' scare charges. An updated Marine Mammals Chapter will be submitted at Deadline 5. The Applicants welcome Natural England's confirmation that this issue will be readily resolved.	No change. Our comment at Deadline 3 also applies here.		Please see the Applicants' response to RI_E3. The updates made at Deadline 5 to Volume 2, Chapter 4: Marine Mammals (F2.4/F02) to include the removal of references to deterrence using 'soft start' scare charges for UXO clearance. The Applicants welcome Natural England's confirmation that this issue will be readily resolved.

ID	Risk and Issue Log comment	RAG Status Rel and WR Rep and D1	Applicants' comment at Deadline 4 (in response to NE D3 submission)	Natural England's Comments/Update on Progression at Deadline 4	RAG D4	Applicants' comment at Deadline 5 (in response to NE D4 submission)
RI_E5	Standard industry measures (such as Marine Mammal Observers (MMOs), Passive Acoustic Monitoring (PAM) and Acoustic Deterrent Devices (ADDs)) are intended to minimise the risk of injury, thus they cannot be used as a justification to conclude that there will be no significant disturbance of the species. Mitigation measures aimed to reduce disturbance should be considered instead of relying on measures for reducing the risk of injury. This needs to be revised throughout the assessment.		Please see the Applicants' response to RI_E3.	No change. Our comment in RI_E3 also applies here.		<p>At Deadline 2, Natural England's position for RI_E5 was stated as <i>"In progress: Our response to RI_E3 above is equally applicable here"</i>. Natural England's response to RI_E3 at Deadline 2 was <i>"In progress: We note the Applicant has removed high order UXO from the DCO [REP1-008]. We advise that the Applicant should submit an updated version of their MMMP and Marine Mammal Chapter into Examination to reflect that high order has been removed from the DCO. We highlight that the Morgan Generation project made similar updates and submitted these into the Morgan Examination at Deadline 6 [REP6-032]. Provided that these updated documents are submitted into examination, we believe this issue will be readily resolved."</i></p> <p>Therefore, in line with the response to R-E3 above, the Applicants confirm that an updated version of Volume 2, Chapter 4: Marine Mammals (F2.4/F02) has been submitted at Deadline 5, to reflect that high order has been removed from the DCO and to align with the changes related to the impact of Injury and disturbance from elevated underwater sound during UXO clearance made at Examination Deadline 6 for the Morgan Offshore Wind Farm: Generation Assets (Morgan Generation Assets examination Library REP6-031), as requested by Natural England at Deadline 2 for the Transmission Assets (REP-062). As such, the Applicants are confident that RI-E5 can be resolved with the submission of the updated Marine Mammal chapter at Deadline 5 (F2.4/F02).</p>
RI_E6	Natural England has outstanding concerns regarding the Cumulative Effects Assessment (CEA). Natural England does not agree with the significance of effect for PTS during UXO clearance in the cumulative effects assessment, particularly for harbour porpoise and does not agree with the justification for the conclusions made. Assess population-level consequences of disturbance during the cumulative effects assessment for all scenarios and produce an appropriate mitigation plan if significant effects are predicted. Given the cumulative number of vessels across all projects as well as large disturbance ranges, Natural England does not agree with the assigned magnitude score 'low' for disturbance from elevated underwater sound due to vessel use and other (non-piling) sound producing activities. The assessment provides very limited consideration of the		Please see the Applicants' response to RI_E3.	No change. Our comment in RI_E3 also applies here.		<p>At Deadline 2, Natural England's position for RI_E6 was stated as <i>"In progress: Our response to RI_E3 above is equally applicable here."</i> Natural England's response to RI_E3 at Deadline 2 was <i>"In progress: We note the Applicant has removed high order UXO from the DCO [REP1-008]. We advise that the Applicant should submit an updated version of their MMMP and Marine Mammal Chapter into Examination to reflect that high order has been removed from the DCO. We highlight that the Morgan Generation project made similar updates and submitted these into the Morgan Examination at Deadline 6 (REP6-032). Provided that these updated documents are submitted into examination, we believe this issue will be readily resolved."</i></p> <p>Therefore, in line with the response to R-E3 above, the Applicants confirm that an updated version of Volume 2, Chapter 4: Marine Mammals (F2.4/F02) has been submitted at Deadline 5, to reflect that high order has been removed from the DCO and to align with the changes related to the impact of Injury and disturbance from elevated underwater sound during UXO clearance made at Examination Deadline 6 for the Morgan Offshore Wind Farm: Generation Assets (Morgan Generation</p>

ID	Risk and Issue Log comment	RAG Status Rel and WR Rep and D1	Applicants' comment at Deadline 4 (in response to NE D3 submission)	Natural England's Comments/Update on Progression at Deadline 4	RAG D4	Applicants' comment at Deadline 5 (in response to NE D4 submission)
	potential significant increase of number of vessels and vessel movements for each project. Revise the CEA for disturbance from elevated underwater sound due to vessel use and other (non-piling) sound producing activities with an increased level of magnitude and commit to implementing the Vessel Traffic Management Plan.					Assets examination Library REP6-031), as requested by Natural England at Deadline 2 for the Transmission Assets (REP-062). As such, the Applicants are confident that RI-E6 can be resolved with the submission of the updated Marine Mammal chapter at Deadline 5 (F2.4/F02).
RI_E7	The Maximum Design Scenario (MDS) for Unexploded Ordnance (UXO) clearance differs between the documents. Natural England advise that details relating to UXO clearance MDS should be updated for consistency across all chapters to ensure the Worst Case Scenario (WCS) is appropriately discussed and assessed.					
RI_E8	The MDS for Injury and disturbance to marine mammals from elevated underwater sound due to vessel use and other sound-producing activities in the Marine Mammals chapter [APP-050] differs from the MDS outlined in Chapter 7 Shipping and Navigation [APP-056]. Natural England advise that the MDS should be correctly reported and assessed in all relevant chapters and where chapters make reference to each other ensure all details, e.g. MDS, are consistent.					
RI_E9	Table 4.7 [APP-050] includes all correct protected areas and features. However, the referenced figure 4.1 'SACs and MNRs, designated for the protection of marine mammals within the regional study area' has not been included in Volume 2, Figures [APP-064]. The figure labelled 4.1 in [APP-064] is the marine mammal study area and relevant species MUs not the designated sites. Some figures in accompanying volumes do not have a reference number on the figure but are referenced in the ES. Ensure all figures are appropriately included, labelled, referenced and identifiable from the reference in ES.					
RI_E10	Natural England notes the inclusion of harbour seals in the assessment without a population estimate for the Isle of Man population. Natural England acknowledges the lack of data currently					

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	available in the literature to provide an estimate for the Isle of Man.					
RI_E11	Natural England advises that the reference population for grey seal should consider both the GSRP population estimate and the NW MU estimate. Natural England advise that both should be considered. Revise assessment so that it is undertaken against the NW MU grey seal population alone as the reference population, in addition to the assessment completed against the GSRP population.					
RI_E12	Natural England does not agree with the approach of using a 100km buffer region for grey seal in order to determine connectivity with the Transmission Assets based upon average foraging ranges for the species. maximum foraging distances from Carter et al., 2022 should be used to determine the connectivity from an identified haul out site and the project area. Natural England previously raised this issue during the PEIR stage and it has not been addressed. We do not now anticipate any material changes would be made to the baseline.					
RI_E13	Natural England acknowledges the inclusion in the ES of survey data and other data/ up to date references as requested, e.g. SCANS IV and two years of survey data at Morecambe Offshore Windfarm: Generation Assets and the inclusion of other key references Marine Mammal Welsh Atlas (2023), IAMMWG (2022) and SCOS 2022.					
RI_E14	The significance of auditory injury to harbour porpoise from UXO detonation should be amended to major, in line with the most significant option in the dual matrix category. Update the conclusions for auditory injury for harbour porpoise in the ES.		Please see the Applicants' response to RI_E3.	No change. Our comment in RI_E3 also applies here.		Please see the Applicants' response to RI_E3.
RI_E15	Inconsistency in the approach when assigning the sensitivity score for effects on marine mammals due to changes in prey availability. Minke whale has been assigned a sensitivity of medium, however harbour seal and harbour					

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	porpoise have both been assigned a sensitivity of low. Due to the vulnerability of harbour porpoise and harbour seal to changes in prey availability, their assigned sensitivity score should be medium in the assessment.					
RI_E16	Natural England disagrees that a period of several months can be considered "short term". However, in paragraph 4.11.6.30 the same description of works is described as 'medium term'. Define the terms to describe both temporal and spatial impacts and apply them consistently across the assessment.					
RI_E17	Natural England notes that the predicted disturbance ranges for sub-bottom profilers (SBPs) and vibro-coring are 17.3km and 10.6km respectively. However, no mitigation measures have been discussed for these large disturbance ranges. Natural England acknowledges that there are currently no other mitigation options available for SBP surveys beside those outlines in the JNCC guidelines for minimising the risk of injury to marine mammals from geophysical surveys (JNCC, 2017). Thus, there is a need for monitoring to fill the knowledge gap on the impact of SBP surveys on harbour porpoises. We therefore advise that monitoring should be considered with the aim to collect data before, during and after SBP surveys to examine changes in the baseline. Inclusion of this monitoring in the IPMP would resolve this issue.					
RI_E18	The maximum disturbance ranges predicted for SBP is up to 17.3 km and is described as 'mild disturbance', however in 4.11.6.29 it states that for 'impulsive sound sources there is an understanding of the difference between strong and mild disturbance, whereas for non-impulsive (continuous) sound sources (MBES, SSS, SBES, SBP (chirp/pinger) and vibro-coring), there is only a single available threshold (120 dB re 1 µPa (SPLrms)), which is classed as the distance beyond which no animals would be disturbed.' This statement contradicts the conclusion					

ID	Risk and Issue Log comment	RAG Status Rel and WR Rep and D1	Applicants' comment at Deadline 4 (in response to NE D3 submission)	Natural England's Comments/Update on Progression at Deadline 4	RAG D4	Applicants' comment at Deadline 5 (in response to NE D4 submission)
	of mild disturbance from SBP sound source. Define the terms correctly for impulsive and non-impulsive sound sources and apply them consistently across the assessment.					
RI_E19	Given the cumulative number of vessels across all projects as well as large disturbance ranges, Natural England does not agree with the assigned magnitude score of 'low' for disturbance from elevated underwater sound due to vessel use and other (non-piling) sound producing activities. Revise the CEA for disturbance from elevated underwater sound due to vessel use and other (non-piling) sound producing activities. Ensure the Applicant commits to implementing their Vessel Traffic Management Plan.					
RI_E20	Natural England acknowledge the MMOs advice to the Applicant to commit to using Noise Abatement Systems (NAS) as mitigation during construction. Natural England notes CoT64 where the Applicants has committed to developing and implementing a detailed MMMP which will include the use of low order techniques as the primary mitigation where possible. The detailed MMMP should consider guidelines for minimising the risk of injury to marine mammals from UXO (JNCC, 2025). Natural England advises the Applicant should continue to prioritise other measures, such as avoidance, relocation and low-order clearance methods such as deflagration over high order clearance and to consider and apply new guidelines for minimising the risk of injury to marine mammals from UXO. These other measures should all be included in the final MMMP.					
RI_E21	Natural England defers to CEFAS as the underwater sound specialists to comment on the Underwater Sound Technical Report.					
RI_E22	Please note that it is Natural England's remit to provide advice on the assessment in so much as it relates to SACs in English waters. We defer to the relevant SNCBs on the appropriate					

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	approach for assessing SACs outside English waters.					
RI_E23	Natural England notes that the Applicant is more likely to carry out sequential UXO clearance, however the assessment states that 'A spatial MDS would occur where UXO clearance activities coincide at all three projects simultaneously'. There remains potential for UXO clearance activities to coincide at all 3 projects simultaneously, therefore there could be a significant impact on marine mammals that could manifest to population level effects based on the PTS figures for high order UXO clearance. Natural England advise the Applicant to produce an appropriate mitigation plan should this scenario occur.		Please see the Applicants' response to RI_E3.	No change. Our comment in RI_E3 at also applies here.		Please see the Applicants' response to RI_E3.
RI_E24	We note that the mitigation measures to minimise disturbance to marine mammals included within the Offshore EMP are only relevant to the transiting vessels. Consider appropriate measure for all other (non-piling) sound producing activities, not just transiting vessels.					

3.8 Risk and Issues Log – Offshore Ornithology

Table 3-8: Responses to questions regarding Offshore Ornithology

ID	Risk and Issue Log comment	RAG Status Rel and WR Rep and D1	Applicants' comment at Deadline 4 (in response to NE D3 submission)	Natural England's Comments/Update on Progression at Deadline 4	RAG D4	Applicants' comment at Deadline 5 (in response to NE D4 submission)
Risk and Issues Log Deadline 1 – Offshore Ornithology Taken from Natural England's Relevant and Written Representations Morgan and Morecambe Transmission Assets Appendix F - Offshore Ornithology						
RI_F1	The Applicant should complete a quantified cumulative assessment of impacts on species sensitive to disturbance and displacement, including mortality figures for each project included in the assessment, and provide clarity on the parameters used to produce those figures. The result should comprise a total abundance of birds that could be affected and a range of final mortality estimates based on a range of possible displacement and mortality rates, as per Natural England best practice guidance.		<p>The Applicants confirm that the ES chapter (Volume 2, Chapter 5: Offshore Ornithology (APP-053)) will be updated and submitted at Deadline 5.</p> <p>Additionally, the Applicants highlight that a new commitment has been made at Deadline 4 stating that "The Applicants will not plan routine O&M activities in the original Liverpool Bay SPA (as designated in 2010), including a 2 km buffer between November and March (inclusive) unless in urgent circumstances." (see CoT135 in the updated Commitments Register (F1.5.3/F05)).</p>	No change - we look forward to sight of updated documents.		The Applicants confirm that an updated version of the ES chapter (Volume 2, Chapter 5: Offshore Ornithology (F2.5/F02)) and HRA Stage 2 Information to Support an Appropriate Assessment Part Three (E2.3/F02) have been submitted at Deadline 5.
RI_F2	Natural England recommend that an assessment of the long-term loss of seabed habitat that potentially supports prey species for the ornithological features of Liverpool Bay SPA is included in the Information to Support Appropriate Assessment. This should be based on an assessment of the area of suitable spawning and other supporting habitat for prey species that could be lost due to the construction of the cable corridor, with consideration of i) diver and in particular scoter densities along those parts of the cable route where rock protection might be needed and ii) the presence of key species/habitats that fall within that area.		The Applicants confirm that the ES chapter (Volume 2, Chapter 5: Offshore Ornithology (APP-053)) and HRA Stage 2 Information to Support an Appropriate Assessment Part Three (APP-017) will be updated and submitted at Deadline 5.	No change - we look forward to sight of updated documents.		The Applicants confirm that an updated version of the ES chapter (Volume 2, Chapter 5: Offshore Ornithology (F2.5/F02)) and HRA Stage 2 Information to Support an Appropriate Assessment Part Three (E2.3/F02) have been submitted at Deadline 5.
RI_F3	Natural England do not agree with the conclusion that adverse effect on site integrity (AEol) for the red-throated diver and common scoter features of Liverpool Bay SPA can be ruled out due to the displacement and disturbance impacts of the Project alone during the construction phase. Natural England highlights that the conservation advice		The Applicants welcome the resolution of this issue at Deadline 3.			

ID	Risk and Issue Log comment	RAG Status Rel and WR Rep and D1	Applicants' comment at Deadline 4 (in response to NE D3 submission)	Natural England's Comments/Update on Progression at Deadline 4	RAG D4	Applicants' comment at Deadline 5 (in response to NE D4 submission)
	for these features include targets to maintain the distribution of the feature and the extent, distribution and availability of supporting habitat, preventing deterioration from current levels, not just population abundance. The Project's potential to cause AEol can be avoided by the Applicant committing to a full restriction on all offshore construction and pre-construction (UXO clearance) activity with the potential to cause disturbance within the SPA and a 2km buffer around it during the wintering months of November to March (inclusive).					
RI_F4	Natural England are unable to reach a conclusion regarding the Project's impacts during the operations and maintenance (O&M) phase, either alone or in-combination, as the maximum design scenario (MDS) is set out on an annual basis. Alongside the annual MDS, the Applicant should set out the MDS for the key wintering months of November to March (inclusive), particularly for any activities which have the potential to cause disturbance to sensitive ornithological features within Liverpool Bay SPA and consider the need for a seasonal restriction for O&M activities.		<p>The Applicants have included the suggested commitment to the Commitments Register (F1.5.3/F05) at Deadline 4 stating that "The Applicants will not plan routine O&M activities in the original Liverpool Bay SPA (as designated in 2010), including a 2 km buffer between November and March (inclusive) unless in urgent circumstances." (see CoT135)</p> <p>Additionally, the Applicants highlight that the following measures have already been included in the Measures to Minimise Disturbance to Marine Mammals and Rafting Birds from vessels at Deadline 2 (REP2-025) and applied, wherever possible, during transit through Liverpool Bay/Bae Lerpwl SPA and out to 2 km from the Liverpool Bay/Bae Lerpwl SPA boundary to and from port and works areas, in line with Natural England's Best Practice Protocol for Vessels in Red Throated Diver SPAs guidance on selecting routes that avoid known aggregations of birds:</p> <p>maintaining direct transit routes (to minimise transit distances through areas used by divers); and</p> <p>avoidance of over-revving of engines (to minimise noise disturbance).</p>	Issue progressed. Natural England notes that in a meeting held 22/07/25, the Applicant informed us of a new commitment which will be submitted at Deadline 4. This will outline the commitment to not planning routine O&M activities in the original Liverpool Bay SPA +2km buffer over core winter months unless in urgent circumstances. We welcome this commitment in principle subject to reviewing the specific wording.		The Applicants confirm that an updated version of the ES chapter (Volume 2, Chapter 5: Offshore Ornithology (F2.5/F02)) and HRA Stage 2 Information to Support an Appropriate Assessment Part Three (E2.3/F02) have been submitted at Deadline 5.
RI_F5	Natural England note that the Applicant has calculated a bespoke regional population for red-throated diver based on the fact that the BDMPS population from Furness (2015), which is generally used as the standard reference for EIA population scales, is smaller than the most recent population estimate for Liverpool Bay alone (HiDef, 2023). The Applicant should calculate a regional population based only on populations					

ID	Risk and Issue Log comment	RAG Status Rel and WR Rep and D1	Applicants' comment at Deadline 4 (in response to NE D3 submission)	Natural England's Comments/Update on Progression at Deadline 4	RAG D4	Applicants' comment at Deadline 5 (in response to NE D4 submission)
	that sit within the original BDMPS region and use this for assessing red-throated diver impacts.					
RI_F6	We note that the wintering period has been identified as covering November-February inclusive. Natural England considers the key sensitive period for red-throated diver to extend until the end of March. Seasonal restrictions on construction activity to avoid impacts on wintering birds should cover the period from the start of November to the end of March.		The Applicants welcome the resolution of this issue at Deadline 3.			
RI_F7	The Applicant should present a range of cumulative quantitative displacement impacts from other projects on red-throated diver and common scoter at an EIA scale in the Irish sea, both those exerting ongoing pressures during their operations and maintenance phase and those whose construction impacts will overlap with the Project, plus the predicted impacts from the Project in its construction stage.		Due to the commitment to a seasonal restriction (during construction and operation & maintenance phases) the project will no longer contribute cumulative seasonal impacts and therefore cumulative assessments are no longer required for red-throated diver and common scoter. The Applicants would welcome confirmation from NE that this is agreed at Deadline 5.	No change.		The Applicants confirm that an updated version of the ES chapter (Volume 2, Chapter 5: Offshore Ornithology (F2.5/F02)) and HRA Stage 2 Information to Support an Appropriate Assessment Part Three (E2.3/F02) have been submitted at Deadline 5.
RI_F8	Due to the sensitivity of key ornithological features of Liverpool Bay SPA during the wintering months of November to March (inclusive). Therefore the Applicant should include descriptions of the maximum design scenario for activities causing airborne sound, underwater sound or presence/movement of vessels and infrastructure within the wintering period for each phase of the Project, in addition to the annual descriptions.					
RI_F9	To fully consider the in-combination impacts on the distribution and the extent, distribution and availability of supporting habitat for the red-throated diver and common scoter features of Liverpool Bay SPA, the Applicant should present an assessment of the area and the proportion of the SPA that is subject to displacement and disturbance impacts due to the Project in-combination with other projects and include West of Duddon Sands OWF as its 10km buffer overlaps with the SPA.		The Applicants welcome the decision to resolve this issue at Deadline 3.			

ID	Risk and Issue Log comment	RAG Status Rel and WR Rep and D1	Applicants' comment at Deadline 4 (in response to NE D3 submission)	Natural England's Comments/Update on Progression at Deadline 4	RAG D4	Applicants' comment at Deadline 5 (in response to NE D4 submission)
RI_F10	Natural England notes the Hynet North West Carbon Capture and Storage (CCS) project has been screened out of the offshore ornithology assessment due to low data confidence. There is a high risk of spatial and temporal overlap of the construction of Hynet North West CCS and the Transmission Assets, therefore Natural England advise this project should be screened into the CEA for offshore ornithology and assessed as part of the Tier 2 projects. Further information should be sought from the Hynet project, specifically information on mitigation measures during construction.		The Applicants welcome the resolution of this issue at Deadline 3.			

3.9 Risk and Issues Log – Onshore Ecology

Table 3-9: Responses to questions regarding Onshore Ecology

ID	Risk and Issue Log comment	RAG Status Rel and WR Rep and D1	Applicants' comment at Deadline 4 (in response to NE D3 submission)	Natural England's Comments/Update on Progression at Deadline 4	RAG D4	Applicants' comment at Deadline 5 (in response to NE D4 submission)
Risk and Issues Log Deadline 1 – Onshore Ecology Taken from Natural England's Relevant and Written Representations Morgan and Morecambe Transmission Assets Appendix G - Onshore Ecology						
RI_G1	<p>Natural England is unable to rule out significant impacts on sand dune SSSI features associated with Lytham St. Annes Dunes due to uncertainties around changes to the water table (both during construction and operation). We are also concerned about dewatering effects associated with pumping out water from the Transition Joint Bay (TJB) during construction, and the cable acting as a conduit altering water flow through the system.</p> <p>Similar concerns are also flagged for sand dune habitat (S41 priority habitat under the NERC Act 2006) at St. Annes Old Links Golf Course Biological Heritage Site (BHS) and Lytham Foreshore Dunes and Saltmarsh BHS.</p> <p>a) We advise that Impacts on dune slack vegetation (which is referable to the Annex I habitat H1290) needs to be more thoroughly assessed.</p> <p>b) Natural England advises the Applicant to consider the installation of dipwells (automatic dataloggers) to monitor the position of the water table pre- and post-construction and this commitment should be included as a part of the ongoing Monitoring Plan</p> <p>c) In addition, we advise that modelling is necessary to determine the position of the water table and potential fluctuations that may arise as part of the proposals over the lifetime of the project.</p>		<p>The Applicants are engaging with Natural England regarding their concerns about potential impacts on the sand dune features of the Lytham St Anne's Dunes SSSI.</p> <p>The Applicants submitted an Outline Hydrogeological Risk Assessment (REP3-061) at Deadline 3. The Applicants anticipate comments from Natural England at Deadline 4.</p>	<p>In progress: Further to the DAS meeting held with the Applicant on 12/06/25 to discuss the Outline Hydrogeological Risk Assessment of Lytham St Annes Dunes SSSI. We have provide detailed comments on [REP3-061] in Appendix G4.</p> <p>Additionally the Applicant informed us on 04/07/25 that an NVC survey at Lytham St Annes Dunes SSSI and St Annes Old Links Golf Course BHS will be undertaken in July. We welcome this survey effort and will provide comments once the results are provided.</p> <p>We continue to advise that monitoring of the water table pre- and post-construction and modelling to understand changes to the water table over the duration of the development is required.</p>		<p>The Applicants can confirm that NVC surveys of Lytham St Annes SSSI and St Anne's Old Links Golf Course Biological Heritage Site have been undertaken. The results of these surveys can be found in Appendix D and E of Volume 3, Annex 3.3: Phase 1 habitat, national vegetation classification and hedgerow survey technical report (F3.3.3/F03). In addition, the Applicants updated the outline hydrogeological risk assessment at D5 (S_D3_6/F02) to reflect the NVC survey findings.</p> <p>In response to the Environment Agency's comments on the outline hydrogeological risk assessment (REP4-132), the Applicants note that a scheme of groundwater monitoring will be undertaken, where required. This would be determined by the engineering specification and design undertaken post consent as part of detailed design. The golf course abstraction boreholes could be used subject to initial baselining and the absence of any drawdown related to their abstraction regime.</p> <p>The installation of new groundwater observation boreholes will need to be balanced against the potential impact to the SSSI from the drilling of additional boreholes or the impact on third party land from the provision of such infrastructure.</p>
RI_G2	<p>Natural England advises that the limited project specific data collected makes it difficult to assess any potential changes in habitat/ species composition associated, for example, with a modified water table brought about by the dewatering and pumping of water during construction from the TJB.</p> <p>Natural England advises that surveys of St. Annes Old Links Golf Course BHS should be undertaken in June 2025 to fill in the evidence gaps to better assess potential changes to habitats and species from the potential dewatering of the site. Use of fine scale Lidar</p>		<p>The Applicants undertook an updated NVC survey of the Lytham St. Annes Dunes SSSI in July 2025. The NVC survey report will be shared with Natural England as soon as it is available and will be submitted into the examination at Deadline 5.</p> <p>The Applicants are planning to undertake the remaining survey at St. Annes Old Links Golf Course BHS subject to landowner permission and include this in the survey report submitted at Deadline 5.</p>	<p>In progress. Our response to RI_G1 is also applicable here.</p>		

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	may help identify low lying areas which may be relict dune slacks.		The Applicants anticipate that this survey information will address Natural England's comments on this matter once provided.			
RI_G3	Further details (map and GPS locations) as to a) the location of the Transmission Joint Bays (TJBs) in Blackpool Airport, b) exit pits on the foreshore, c) the location of Compound 2 and d) the cable alignment under the sand dunes and cable depth is needed to help rule out impacts on sand dune SSSI features associated with Lytham St. Annes Dunes.		<p>The land parcels in which the Transmission Joint Bays will be located are set out in Schedule 1 (Authorised Project) of the draft DCO, and shown in Sheet 3 of the Works Plans - Onshore and Intertidal (AS-016), Works No. 10A/10B. As detailed with the Outline Hydrogeological Risk Assessment (REP3-061), these are a sufficient distance away to avoid impacts to the Lytham St. Annes Dunes SSSI.</p> <p>Each working area for each exit pit on the beach and construction compound 2 will be at least 100m seaward of the Lytham St Annes sand dunes SSSI as secured in Schedule 2A & 2B, Requirement 8 of the dDCO (AS-004) (CoT44).</p>	No change.		<p>The Applicants note there is no change on this matter and refer Natural England to RI_G3 in 'S_D4_2.6 Annex 2.6 to Applicants' Response to Deadline 3 submissions from Statutory Consultees and other organisation: Natural England (REP3-90 - REP3-95, AS-078) - Rev F01' (REP4-100).</p> <p>No further information is available on the TJBs, exit pits, location of compound 2 and the cable alignment/ depth beneath the sand dunes at this stage and will not be available until contractors have been appointed and the detailed design stage completed. However, this information will be presented within the detailed Hydrological Risk Assessment(s) and the detailed Landfall Construction Method Statement(s). Both of these are secured by Requirement 8 of Schedules 2A and 2B of the draft DCO (REF).</p>
RI_G4	Natural England advises that further details on the Direct Pipe Trenchless Technique and evidence to support its feasibility is required to be able to fully assess the potential impacts to Lytham St. Annes Dunes SSSI. An outline contingency plan should be developed and the Worst Case Scenario (WCS) should be at least assessed in the assessment, i.e. cable installation failure when using Direct Pipe Trenchless Technique.		The Applicants note there is no change on this matter, and that there is no further information that can be submitted in respect of the trenchless crossing of the dunes other than that provided in previous responses (see RR-1601.52 within PDA-014).	No change.		To address Natural England's concern the Applicants have prepared and submitted an Outline Trenchless Crossing Mitigation Plan as Appendix A to the Outline Landfall Construction Method Statement (C1/F07).
RI_G5	The condition of Lytham St. Annes Dunes SSSI is currently assessed as Unfavourable Recovering (based on a 2014 Natural England assessment). To achieve Favourable condition of the dunes ongoing management of the Fylde Dunes (including Lytham St. Annes Dunes SSSI and Lytham Foreshore Dunes and Saltmarsh BHS as outlined in Skelcher (2024) has been agreed. Natural England advises that the Applicant should consider in the Outline Ecological Management Plan how the required management actions outlined in Skelcher will continue to take place during the duration of the project.		<p>The Applicants can confirm there will be no restriction as a result of the Transmission Assets to the ongoing management works at Lytham St. Annes Dune SSSI and Lytham Foreshore Dunes & saltmarsh.</p> <p>The Applicants will discuss how best to secure this with Natural England and provide an update at Deadline 5.</p>	No change.		<p>The Applicants note there is no change on this matter and refer Natural England to RI_G5 in 'S_D4_2.6 Annex 2.6 to Applicants' Response to Deadline 3 submissions from Statutory Consultees and other organisation: Natural England (REP3-90 - REP3-95, AS-078) - Rev F01' (REP4-100).</p> <p>The Applicants have confirmed that the existing management works to the dunes can continue as planned because there will be no above ground works within the dunes. The Applicants have also committed to avoiding works over winter between November and March (CoT110 and CoT129) and will therefore not be working on the beach or near the dunes when the majority of the habitat management works (e.g. Christmas tree planting) will be undertaken.</p>

ID	Risk and Issue Log comment	RAG Status Rel and WR Rep and D1	Applicants' comment at Deadline 4 (in response to NE D3 submission)	Natural England's Comments/Update on Progression at Deadline 4	RAG D4	Applicants' comment at Deadline 5 (in response to NE D4 submission)
RI_G6	From the information provided Natural England does not consider there to be reasonable justification for the lack of Agricultural Land Classification (ALC) survey effort to date. Natural England advises (a) the Applicant needs to undertake a detailed ALC and soil survey of the agricultural land across the full Study Area to inform the application. And (b) the commitment to restore land needs to be secured in the DCO to not only reinstate the land but to ensure the site will be restored at a minimum to the same ALC grade as before construction, to ensure that land quality will not be negatively affected.		The Applicants have responded to Natural England's response in REP3-093.3 (S_D4_2.6) as well as in NE16 above.	No change.		The Applicants note there is no change on this matter and refer Natural England to RI_G6 in 'S_D4_2.6 Annex 2.6 to Applicants' Response to Deadline 3 submissions from Statutory Consultees and other organisation: Natural England (REP3-90 - REP3-95, AS-078) - Rev F01' (REP4-100). The Applicants requested a meeting with Natural England to try and understand why they have a different approach to other projects when compared to Transmission Assets. In addition, the Applicants would have used the meeting to note that they are aligned with relevant standards and other project approaches. As Natural England have declined a meeting and not given a justification on their approach the Applicants conclude that this is a point where the conclusion will be that the parties 'agree to disagree'.
RI_G7	Natural England utilises the England Peat Status Greenhouse Gas and Carbon Storage which identifies that part of the cable route is situated on deep peat. At this stage there is not enough information for Natural England to advise if the proposal will have direct or indirect impacts on deep peat. Natural England do not support the principle of developing on restorable peat. Natural England advises that further evidence and survey data is required. Peat surveys should be carried out in line with the IUCN peatland programme field protocol. A Peat Management Plan will be required for any buried deep peat around the cabling route, even if it is remaining in situ.		The Applicants have submitted a Peat Technical Note (S_D4_15) at Deadline 4 that provides Natural England with further information on the assessment of impacts to deep peat. The note provides a collation of the information on peat deposits and peaty soils within the Transmission Assets ES and the findings of both the desk top and survey work undertaken. In addition, it provides a summary of the documents where references to peat are made along with how the responses from Natural England's D3 submissions have been considered and addressed (where appropriate). In addition, further survey work will be undertaken pre-construction and the avoidance/mitigation measures set out in the outline soils management plan (J1.7/F02) will be applied which is a proportionate and appropriate way to manage any peat encountered.	No change. We note the surveys undertaken in the Outline Interim Trial Trenching Report [REP3-017]. This report identified that peat was present within the trial pits. In light of the confirmed peat occurrences, a detailed peat survey should be carried out to establish peat depth, condition, and extent within the onshore order limits, ensuring that appropriate management and mitigation measures can be developed. These surveys are necessary to understand if any of the peat is restorable and to inform a Peat Management Plan (which we previously advised in our Relevant Representations, RR-1601).		The Applicants note there is no change on this matter and refer Natural England to RI_G7 in 'S_D4_2.6 Annex 2.6 to Applicants' Response to Deadline 3 submissions from Statutory Consultees and other organisation: Natural England (REP3-90 - REP3-95, AS-078) - Rev F01' (REP4-100). The Applicants response to Hearing Action Point 14 (REP4-118) identifies all of the evidence collated in relation to peat within the ES. This includes the locations identified by the archaeological trenching where peat or peaty horizons are identified and a description of the high level of correlation between these findings and those of the separate detailed soil survey work that has been undertaken and reported in Volume 3 Annex 6.1 of the ES (APP-105). The Applicants have committed to carrying out further peat survey work prior to construction as part of the development of the detailed Soil Management Plan. This is identified in the Outline SMP (REP4-040) at Section 1.8.6.3.
RI_G8	Natural England advises as per our advice on other joint DCO applications such as the East Anglia offshore windfarms and most recently for Dudgeon and Sheringham Extension Projects that a commitment is made, that whichever project is constructed first installs the onshore cable ducts for both projects to minimise the environmental impacts and the working corridors if construction overlaps. We advise full consideration of all mitigation measures are considered as part of the consenting process.		The Applicants have no additional comment to make further to previous responses within RR-1601 1601.G.8 (PDA-021) and Annex 5.2 to the Applicants response to Hearing Action Points: ISH1 6, 8, 9, 19, 26 & 28 (REP1-039).	No change.		The Applicants note there is no change on this matter and refer Natural England to RI_G8 in 'S_D4_2.6 Annex 2.6 to Applicants' Response to Deadline 3 submissions from Statutory Consultees and other organisation: Natural England (REP3-90 - REP3-95, AS-078) - Rev F01' (REP4-100).
RI_G9	To better understand the potential impacts at dune structure and function, Natural England		The Applicants submitted an Outline Hydrogeological Risk Assessment (REP3-061)	No change.		The Applicants note there is no change on this matter and refer Natural England to RI_G9 in

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	queries the minimum required distance between the 6 proposed cables in order to minimise the effect of heat transfer. Where the cable crosses under Lytham St. Annes Dunes SSSI and St. Annes Old Links Golf Course BHS the Order Limit has been minimised (which is welcomed), but using the current MDS this would mean the route is constrained at its narrowest point to 260m to the north and 220m to the south. Depending on the required distance between the cables this could result in the cables underlying a significant proportion of the SSSI dunes and relict dunes. Natural England advises that clarity is needed regarding the minimum distance between cables. This ideally would be illustrated showing the cable alignment within the Order Limits and the distance between the cables given in metres.		at Deadline 3. This includes the assessment of the impact on groundwater temperature through operational cable heating. It was concluded that the initial risk rating is low risk which would be reduced to very low risk if secondary mitigation options were implemented. Noting, that the implementation of secondary mitigation options if required will be determined at detailed design stage and detailed within the Detailed Hydrogeological Risk Assessments secured by requirement 8(2)(o) of Schedules 2A and 2B of the draft DCO [REP 3 – 009]. The Applicants anticipate comments from Natural England at Deadline 4.			'S_D4_2.6 Annex 2.6 to Applicants' Response to Deadline 3 submissions from Statutory Consultees and other organisation: Natural England (REP3-90 - REP3-95, AS-078) - Rev F01' (REP4-100). The Applicants have received Natural England's comments on the Outline Hydrogeological Risk Assessment at D4 (REP-140) and have provided a response to these at D5 (NE13). In addition, the Applicants have updated the Outline Hydrogeological Risk Assessment (S_D3_6) in line with REP-140 and re-submitted at D5 (S_D3_6/F02). The Applicants have made a commitment (CoT128 of Volume 1, Annex 5.3: Commitments Register of the ES (F1.5.3/F06)) to undertake detailed hydrogeological risk assessment(s) in relation to the crossing of the Lytham St Annes Dunes SSSI. These assessment(s) will be used to inform the detailed site-specific crossing design(s) for the installation of the offshore export cables beneath Lytham St Annes Dunes SSSI. This is secured by Requirement 8 of Schedules 2A and 2B of the draft DCO (C1/F07).
RI_G10	Natural England advises that the Applicant clarify what temperatures may extend to the surface and across the dune structure when the cable is operational and assess and provide evidence on any possible impact on sand dune vegetation in terms of affecting water availability and mimicking drought (especially with increased issues of summer drought associated with climate change).		The Applicants submitted an Outline Hydrogeological Risk Assessment (REP3-061) at Deadline 3. This includes the assessment of the impact on groundwater temperature through operational cable heating. It was concluded that the initial risk rating is low risk which would be reduced to very low risk if secondary mitigation options were implemented. Noting, that the implementation of secondary mitigation options if required will be determined at detailed design stage and detailed within the Detailed Hydrogeological Risk Assessments secured by requirement 8(2)(o) of Schedules 2A and 2B of the draft DCO [REP 3 – 009]. The Applicants anticipate comments from Natural England at Deadline 4.	No change.		The Applicants note there is no change on this matter and refer Natural England to RI_G10 in 'S_D4_2.6 Annex 2.6 to Applicants' Response to Deadline 3 submissions from Statutory Consultees and other organisation: Natural England (REP3-90 - REP3-95, AS-078) - Rev F01' (REP4-100). With regard to Natural England's comment of 'no change', the Applicants would like to understand the reasons behind this position and whether Natural England are comfortable with the outline hydrogeological risk assessment (noting this has been updated at Deadline 5 (S_D3_6) and that comments will be given by Natural England at Deadline 6. The Applicants note that the cables lose energy as heat during operations in proportion to the power that is being transmitted through the cables at a given moment. The cable system will be designed to not exceed 90-degrees Celsius over its operational lifetime, however the average temperature of the cables will be significantly lower due to the variable nature of wind power generated. The Applicants reconfirm that it is likely that any increase in soil temperature will be localised and confined to the areas immediately surrounding the offshore cables, and note that there is evidence that operation of cable systems for windfarms have negligible impact

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						<p>on soil temperatures away from the immediate vicinity of the cables;</p> <ul style="list-style-type: none"> A lab-based study, by <i>C.J. Emeana et al., 2016</i>, concludes 'Our results suggest that for submarine HV cables with surface temperatures up to 60 °C above ambient and buried within clays to coarse silts with low permeability ... Temperatures are only raised significantly within 40 cm radius of the cable.' A field study, by <i>Meißner et al., 2007</i>, measured a 1.4 Celsius increase in soil temperature 20cm below the seabed, above a subsea cable buried to a DoL of 3.0m on the Nysted offshore windfarm. <p>As stated within the Project Description (Table 3.13, REP2-008), the drill profile of the trenchless technique underneath the Dunes SSSI will be a minimum of 10m, to a maximum of 30m, therefore the depth to the ground surface greatly exceeds the zone over which measurable temperature rise is expected. The Applicants consider there is likely to be a shallow, laterally continuous water table. At 10m depth, the cable will be located within the saturated zone of the groundwater which will have an additional cooling effect.</p>
RI_G11	Natural England advises that the ES should present the detailed and semi-detailed Agricultural Land Classification (ALC) survey information. This should include a breakdown of the ALC grades (area, %) in relation to the application site boundary and include ALC and soil data for the cable route and areas of permanent infrastructure and habitat enhancement. A breakdown of the proposed site into disturbed and undisturbed land categories should also be included, split by ALC grade, to help illustrate the potential for impact on agricultural land grade.		The Applicants have responded to Natural England's response in REP3-093.4 (S_D4_2.6).	No change.		The Applicants note there is no change on this matter and refer Natural England to RI_G11 in 'S_D4_2.6 Annex 2.6 to Applicants' Response to Deadline 3 submissions from Statutory Consultees and other organisation: Natural England (REP3-90 - REP3-95, AS-078) - Rev F01' (REP4-100). In addition, the Applicants direct Natural England to Table 6.9 in Volume, Chapter 6: Land use and recreation which outlines the agricultural land quality distribution within the study area according to soil surveys and Table 6.10 which sets out the agricultural land quality distribution within the onshore substation sites (permanent land take) according to soil surveys.
RI_G12	Natural England notes the reference to topsoil removal, back filling of topsoil level and replacement of topsoil, but no proposed timeline of activities included. As part of an Outline Soil management Plan [APP-200] Natural England advises that further information on the timeline of proposed soil handling is provided and mitigation measures to minimise the impacts secured.		The Applicants have responded to Natural England's response in REP3-093.6 (S_D4_2.6).	No change.		The Applicants note there is no change on this matter and refer Natural England to RI_G12 in 'S_D4_2.6 Annex 2.6 to Applicants' Response to Deadline 3 submissions from Statutory Consultees and other organisation: Natural England (REP3-90 - REP3-95, AS-078) - Rev F01' (REP4-100). The Applicants highlight that Requirement 16, Schedules 2A and 2B of the draft DCO (REP4-007) notes that reinstatement of land that is used temporarily for construction must be reinstated within 12 months

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						following the completion of the relevant stage of works.
RI_G13	Natural England notes that following installation of ducts and backfilling of trenches the cables will be pulled through the ducts from joint bays. Natural England advises that the depth of the cabling laying be secured in a named plan and on the face of the DCO/dML. This depth is expected to be consistent with the industry standard of 0.9m depth.		The Applicants have no additional comment to make further to previous response within RR-1601 1601.G.15 (PDA-021). In addition, in response to CAH2, the Applicants have produced a note to confirm whether minimum cable burial depth can be secured within the outline management documents (CAH2.8).	No change.		The Applicants note there is no change on this matter and refer Natural England to RI_G13 in 'S_D4_2.6 Annex 2.6 to Applicants' Response to Deadline 3 submissions from Statutory Consultees and other organisation: Natural England (REP3-90 - REP3-95, AS-078) - Rev F01' (REP4-100).
RI_G14	Further information on the timings of survey observations, quadrat locations and how wetness of dune slacks was calculated should be provided to better understand the robustness of the survey data. This should include date of NVC surveys (2016 or 2024), map showing quadrant locations and a quadrant data table		The Applicants can confirm that the quadrats shown on Figure 1.3 and the quadrat data presented in Appendix C relate to the NVC ground-truthing survey undertaken in August 2024. Further to this, the Applicants have undertaken an updated NVC survey of the SSSI dunes in August 2025 (completed by a FISC level 6 botanical surveyor) and this report, which will include an updated NVC habitat map of the dunes, will be submitted at Deadline 5. s. The woodland NVC surveys were undertaken in June 2023.	In progress. We note that the Applicant informed NE on 04/07/25 that an NVC survey at Lytham St Annes SSSI will be undertaken in July. We welcome this survey effort and advise the surveys undertaken by the Applicant or other surveys which have already been referenced in the application e.g. Skelcher (2016), are clearly identified in relevant documents and figures to ensure information is clearly presented.		The Applicants have submitted an updated version of Volume 3 Annex 3.3: Phase 1 habitat, national vegetation classification and hedgerow survey technical report (F3.3.3/F03), which includes minor amendments to clarify the quadrats shown on Figure 1.3 and provided as Appendix C related to NVC ground-truthing surveys undertaken by the Applicants in August 2024. See also response to R1_G1. It is assumed that Natural England has sufficient detail in response to this comment to close out this issue.
RI_G15	Natural England notes that the maximum design parameter represented in Table 3.23 for the construction cable corridor (temporary) does not align with calculations made elsewhere within the chapter. Natural England advises that the MDS should be consistent across ES chapters and named plans.		The Applicants welcomes this response.			
RI_G16	Natural England notes that the document states that proposed biodiversity benefit and ecological mitigation areas have not been subjected to surveys. Natural England advises that soil testing for basic soil properties (pH, SOM and macro-nutrients) should be completed at the same time as the ALC and soil survey.					
RI_G17	Natural England notes that it is stated that the location of representative auger boring surveys were chosen to reflect the main soil types identified within the Onshore Order Limits, according to the desktop information. Natural England advises that this is insufficient. Natural England advises that the ES should present the detailed and semi-detailed Agricultural Land Classification (ALC) survey information across the full Study Area. This should include a breakdown of the ALC grades (area, %) in relation to the application site boundary and		The Applicants have responded to Natural England's response in REP3-093.3 (S_D4_2.6) as well as in NE16 above.	No change.		The Applicants note there is no change on this matter and refer Natural England to RI_G17 in 'S_D4_2.6 Annex 2.6 to Applicants' Response to Deadline 3 submissions from Statutory Consultees and other organisation: Natural England (REP3-90 - REP3-95, AS-078) - Rev F01' (REP4-100). The Applicants requested a meeting with NE to resolve issues, including a discussion of the findings of the soil survey work undertaken, the precautionary approach adopted towards the assessment of the effects of Transmission Assets on

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	include ALC and soil data for the cable route and areas of permanent infrastructure and habitat enhancement.					ALC and the commitment to undertake additional soil survey work pre-construction. As Natural England have declined a meeting and not given a justification on their approach the Applicants conclude that this is a point where the conclusion will be that the parties 'agree to disagree'.
RI_G18	It is unclear whether the archaeological trenches would meet the requirements to obtain relevant data (soil properties) to determine ALC grade. Natural England advises that further survey data should be provided to support the ES soils assessment and further monitoring requirements prior to construction agreed.		The Applicants have responded to Natural England's response in REP3-093.3 (S_D4_2.6).	No change.		<p>Section 1.7 of the outline Soil Management Plan (REP4-040) identifies that the initial survey work undertaken to inform relevant sections of the Environmental Statement will be supplemented by further soils surveys pre-construction undertaken at a density of one observation per hectare (ha).</p> <p>Where survey work has not been undertaken to date, further survey work will be used to characterise the soil properties and identify the depths of different topsoil and subsoil units (if necessary) to be stripped within the working areas, to ensure soil types are separately stored and to inform the detailed Soil Management Plan(s).</p> <p>The Applicants have made a commitment (CoT81 o Volume 1, Annex 5.3: Commitments Register of the ES (F1.5.3/F06) to develop detailed Soil Management Plan(s) in line with the Outline Soil Management Plan (J1.7/F03). This is secured by Requirement 8 of Schedules 2A & 2B of the draft development consent order (C1/F07). Detailed CoCP(s) will be implemented by the Applicants as approved by the relevant planning authorities.</p>
RI_G19	Natural England advises that the commitment needs to be secured in the DCO to not only reinstate the land but to ensure the site will be restored at a minimum to the same ALC grade as before construction, to ensure that land quality will not be negatively affected. The commitment to implementing additional measures to further benefit the land quality/productivity should also be included. We also advise that the Outline Soils Management Plan should include restoration criteria to ensure the land is aligned to the ALC survey results.		The Applicants have responded previously in RR-1601 1601.G.26 (PDA-021) and RI_G19 (REP3-055). The Applicants' position remains unchanged. Requirement 16, Schedules 2A&2B of the draft DCO {REP 3-009] notes that land would be reinstated within 12 months of the completion of the relevant stage of works.	No change.		<p>The Applicants note there is no change on this matter and refer Natural England to RI_G19 in 'S_D4_2.6 Annex 2.6 to Applicants' Response to Deadline 3 submissions from Statutory Consultees and other organisation: Natural England (REP3-90 - REP3-95, AS-078) - Rev F01' (REP4-100).</p> <p>The Applicants have requested a meeting with NE to resolve issues, including a discussion of the findings of the soil survey work undertaken, the precautionary approach adopted towards the assessment of the effects of Transmission Assets on ALC and the commitment to undertake additional soil survey work pre-construction. As Natural England have declined a meeting and not given a justification on their approach the Applicants conclude that this is a point where the conclusion will be that the parties 'agree to disagree'.</p> <p>Section 1.7 of the outline Soil Management Plan (REP4-040) identifies that the initial survey work undertaken to inform relevant sections of the Environmental Statement will be supplemented by</p>

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						further soils surveys pre-construction undertaken at a density of one observation per hectare (ha) Where survey work has not been undertaken to date, further survey work will be used to characterise the soil properties and identify the depths of different topsoil and subsoil units (if necessary) to be stripped within the working areas, to ensure soil types are separately stored and to inform the detailed Soil Management Plan(s).
RI_G20	Natural England advises that air quality impacts on ecological features including international and nationally designated sites and their qualifying features should be considered in the chapter.		Table 3.18 in Volume 3, Chapter 3: Onshore ecology and nature conservation (APP-075) provides a summary of impacts that were scoped into the assessment; however, it does not provide a breakdown of topics that were assessed by IEF. Therefore, not all of the topics listed in Table 3.18 were assessed for each IEF. An assessment of potential air quality effects resulting from dust deposition arising during earthworks, construction and trackout on sensitive features of the Ribble and Alt Estuaries SPA and Ramsar, Ribble Estuary SSSI, Newton Marsh SSSI and Lytham St Annes Dunes SSSI has been undertaken in Tables 9.34 and 9.35 of Volume 3 Chapter 9: Noise and Air Quality (APP-121) and the effects are assessed as negligible (paragraph 9.11.2.15). Therefore, these receptors were not carried over into the ecology assessment.	No change.		The Applicants note there is no change on this matter and refer Natural England to RI_G20 in 'S_D4_2.6 Annex 2.6 to Applicants' Response to Deadline 3 submissions from Statutory Consultees and other organisation: Natural England (REP3-90 - REP3-95, AS-078) - Rev F01' (REP4-100). The Applicants maintain that all potential air quality impacts on ecological features including internationally and nationally designated features have been adequately assessed in Volume 3, Chapter 3: Onshore ecology and nature conservation (APP-075) and Volume 3 Chapter 9: Noise and Air Quality (APP-121) and therefore have nothing further to add. The Applicants assume that this issue can be closed out given that no further consultation responses have been provided by Natural England in respect of this outstanding issue.
RI_G21	Natural England advises that further information is needed regarding the proposed mitigations measures to minimise/mitigate impacts on sand lizards e.g. measures to minimise vibration which could cause sand lizard burrows to collapse. The proposed mitigation (3.11.13.19) has not been previously discussed and agreed and the positioning of the cut-off trenches needs to be considered in terms of potential dewatering effect/damage to the foredunes.		A sand lizard mitigation plan has been prepared and added as an appendix to the Outline Ecology Management Plan (S_D4_14). CoT44 relating to the provision of a 100 m buffer between the edge of the SSSI dunes and the direct pipe exit pits on the beach has been updated to include provision of cut-off trenches to reduce vibration effects to the dunes. Further, the Applicants have committed to the avoidance of construction activities at the landfall over the winter period (November to March inclusive) to avoid disturbance to wintering birds (CoT110), which will also avoid the sand lizard hibernation period.	No change.		The Applicants note there is no change on this matter and refer Natural England to RI_G21 in 'S_D4_2.6 Annex 2.6 to Applicants' Response to Deadline 3 submissions from Statutory Consultees and other organisation: Natural England (REP3-90 - REP3-95, AS-078) - Rev F01' (REP4-100). The Applicants submitted an Outline Sand Lizard Mitigation Plan at Deadline 4 and have subsequently revised this document following comments received from FBC at Deadline 4 and submitted it at Deadline 5 (S_D5_15). The Applicants have now agreed with Natural England that an EPS mitigation licence would be obtained for construction activities at the landfall site. A draft EPS licence has been submitted at Deadline 5 (S_D5_16).
RI_G22	Natural England advise that a UXO contingency plan should be provided – should UXO be found within Lytham St. Annes Dunes SSSI.		The Applicants have responded previously in RR-1601 1601.G.30 (PDA-021).	No change.		The Applicants note there is no change on this matter and refer Natural England to RI_G22 in 'S_D4_2.6 Annex 2.6 to Applicants' Response to Deadline 3 submissions from Statutory Consultees

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						and other organisation: Natural England (REP3-90 - REP3-95, AS-078) - Rev F01' (REP4-100).
RI_G23	The Applicant has outlined the onshore survey area as a 150m buffer around the Onshore Order Limits. Natural England typically advise that a buffer of 200m should be used. Provide justification for why a 150m buffer was chosen and how this can be shown to be a sufficient distance to account for all disturbance incidents to Important Ecological Features (IEFs).		The Applicants welcomes this response.			
RI_G24	Natural England notes that for Sand Lizard – timing of works (piling / installation of cofferdams at TJB etc) could be used to minimise risk that vibration cause burrows to collapse when being used by hibernating or breeding Sand Lizard. Natural England advises that further consideration is given to timing restrictions for works near to known Sand Lizard populations.		<p>The Applicants have prepared and submitted an outline sand lizard mitigation plan (S_D4_14) which forms an appendix to the outline ecological management plan (J6/F04). The plan demonstrates that, with appropriate avoidance and the implementation of mitigation measures by the Applicants to manage potential impacts to sand lizards during construction, the construction of the Transmission Assets can proceed without the need for an EPS licence.</p> <p>The Applicants have committed to the avoidance of construction activities at the landfall over the winter period (November to March inclusive) to avoid disturbance to wintering birds (CoT110), which will also avoid the sand lizard hibernation period.</p>	No change.		<p>The Applicants note there is no change on this matter and refer Natural England to RI_G24 in 'S_D4_2.6 Annex 2.6 to Applicants' Response to Deadline 3 submissions from Statutory Consultees and other organisation: Natural England (REP3-90 - REP3-95, AS-078) - Rev F01' (REP4-100).</p> <p>See response to R1_G21. The Applicants will not be undertaking any works between November and March and this will avoid the sensitive sand lizard hibernation period.</p>
RI_G25	Natural England advises that monitoring plans are updated to include pre and post construction monitoring of humid dune slacks. This will help to determine the success of the mitigation measures and confirm the assessment.		The Applicants have responded to Natural England's response in REP3-093.3 (S_D4_2.6)	No change.		The Applicants have undertaken additional NVC surveys of the dunes and adjacent BHS on the golf course in August and September 2025 respectively which have been reported in Volume 3, Annex 3.3: Phase 1 habitat, national vegetation classification and hedgerow survey technical report (F3.3.3/F03). These have been used to update the outline hydrogeological risk assessment (S_D3_6/F02), although it is noted that the baseline conditions reported by the surveyor remain in line with the assumptions made both in the ecological impact assessment and the outline hydrogeological risk assessment. These data can be used as a baseline for post-construction monitoring.
RI_G26	Natural England should be informed of any bentonite breakouts that occur on any SPA, Ramsar or SSSI sites or within any sand dune or foreshore habitats. Ground investigation works should be taken to inform consenting and to ensure the technical feasibility of any proposed mitigation associated with landfall installation methodology. Natural		The Applicants prepared and submitted an outline hydrogeological risk assessment of the Lytham St Annes Dunes SSSI (REP3-061) at Deadline 3. The Applicants welcome Natural Engand's comments on this document.	No change.		To address Natural England's concern the Applicants have prepared and submitted an Outline Trenchless Crossing Mitigation Plan as Appendix A to the Outline Landfall Construction Method Statement (S_D4_22/F02).

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	England advises that geotechnical data should be used to ensure that mitigation measures are fit for purpose and are relevant to the proposed installation methodology.					
RI_G27	Fairhaven Saltmarsh is identified in the Outline Ecological Management Plan (J6) as a permanent mitigation area. Natural England advises that more details regarding the proposed permanent mitigation area at Fairhaven Saltmarsh – for example the fencing specification and installation measures are required The Applicant should also refer to Skelcher (2024) botanical report which covers this area (survey from 2010 & 2016)– showing the saltmarsh and sand dune communities that are present.		The Applicants have submitted a 'clarification note on the current position with Natural England (re Adverse Effect on Integrity) and the Fairhaven saltmarsh mitigation area' in response to hearing action point 12 raised at Issue Specific Hearing 2 (S_D4_9). The note clarifies the current position with natural England (re adverse effect on integrity) and the Fairhaven saltmarsh mitigation area.	Progressed but not resolved. On 25/07/2024 Natural England attended a meeting with the Applicant to discuss onshore ornithology matters. Impacts on passage waterbirds at landfall was discussed and further advice is included in our submission at Deadline 3 [AS-078]. In discussion with the Applicant they outlined a new potential commitment aimed at reducing the impacts to passage features at landfall. We provided verbal advice in the meeting and then detailed written advice. If and when this is submitted into Examination we will provide advice as required.		Following a meeting with Natural England on 16 th September 2025 further clarification was provided, which allowed Natural England and the Applicants to agree that subject to the Applicants submitting further information into Examination at Deadline 5, (which was discussed during the meeting and subsequently over email), Adverse Effect on Integrity on the Ribble and Alt Estuaries SPA and Ramsar sites can be ruled out, due to the adoption of mitigation measures at the landfall location for the passage periods. The mitigation measures included for the passage period include screening around the compounds on Lytham St Annes beach and employment of an Ecological Clerks of Work who will be on site during landfall construction operations. It is agreed that the Fairhaven Saltmarsh scheme is an alleviation measure which aims to address the residual impacts from the development and reduce existing pressures on ornithological features of the SPA and Ramsar sites, including those species which may be affected by the works in the intertidal.
RI_G28	Natural England disagree with the conclusion of effect of changes in hydrogeology on the SSSI and LNR will be minor adverse - not significant. Natural England advises that further survey evidence should be provided to support the Application conclusions.		The Applicants submitted an Outline Hydrogeological Risk Assessment (REP3-061) at Deadline 3. This includes the assessment of the impacts to the SSSI and LNR. The Applicants anticipate comments from Natural England at Deadline 4.	No change.		The Applicants note there is no change on this matter and refer Natural England to RI_G28 in 'S_D4_2.6 Annex 2.6 to Applicants' Response to Deadline 3 submissions from Statutory Consultees and other organisation: Natural England (REP3-90 - REP3-95, AS-078) - Rev F01' (REP4-100). See response to R1_G25. The Applicants have undertaken further NVC surveys and have prepared an Outline Hydrogeological Risk Assessment to bring together hydrology and ecological assessment work undertaken to date (S_D3_6/F02). The Applicants have made a commitment (CoT128 of Volume 1, Annex 5.3: Commitments Register of the ES (F1.5.3/F06)) to undertake detailed hydrogeological risk assessment(s) in relation to the crossing of the Lytham St Annes Dunes SSSI. These assessment(s) will be used to inform the detailed site-specific crossing design(s) for the installation of the offshore export cables beneath Lytham St Annes Dunes SSSI. This is secured by Requirement 8 of Schedules 2A and 2B of the draft DCO (C1/F07).
RI_G29	Natural England has focused on coastal habitats and no SAC sites were identified within the Order of Limits. Natural England have not		The Applicants welcomes this response.			

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	reviewed the HRA reports – but note sand dune habitats which could be classified as an Annex I habitat type have been covered in [APP-018]. Natural England advises that impacts to Ramsar habitats will be required.					
RI_G30	[APP-018] Table 1.24 does not consider all potential impact pathways or relevant European sites, specifically air quality impacts have not been considered. [APP-121] states the Ribble Estuary SPA/Ramsar includes features sensitive to dust within 20m of the Onshore Order Limits, therefore these features need to be considered in the HRA. Natural England advises that air quality impacts on internationally designated sites should be considered.		The Applicants have responded previously in RR-1601 1601.G.41 (PDA-021). However, please see response to RI_G20 above for additional air quality impact context.	No change.		<p>The Applicants note there is no change on this matter and refer Natural England to RI_G30 in 'S_D4_2.6 Annex 2.6 to Applicants' Response to Deadline 3 submissions from Statutory Consultees and other organisation: Natural England (REP3-90 - REP3-95, AS-078) - Rev F01' (REP4-100).</p> <p>The Applicants maintain that all relevant IEFs have been scoped into the assessment, and impacts upon them have been adequately assessed and therefore have nothing further to add (see section 3.11 in Volume 3, Chapter 3: Onshore ecology and nature conservation (APP-075). The Applicants assume that this issue can be closed out given that no further clarification points have been provided by Natural England in respect of this outstanding issue.</p>
RI_G31	Table 3.17 includes a list of all Important Ecological Features (IEFs) taken forward into assessment. Natural England advise the chapter to be updated to include information demonstrating why other IEFs have been scoped out for further assessment.		An assessment of potential air quality effects resulting from dust deposition arising during earthworks, construction and trackout on sensitive features of the Ribble and Alt Estuaries SPA and Ramsar, Ribble Estuary SSSI, Newton Marsh SSSI and Lytham St Annes Dunes SSSI has been undertaken in Tables 9.34 and 9.35 of Volume 3, Chapter 9: Noise and Air Quality (APP-121) and the effects are assessed as negligible (paragraph 9.11.2.15). Therefore, these receptors were not carried over into the ecology or ornithology assessments.	No change.		<p>The Applicants note there is no change on this matter and refer Natural England to RI_G31 in 'S_D4_2.6 Annex 2.6 to Applicants' Response to Deadline 3 submissions from Statutory Consultees and other organisation: Natural England (REP3-90 - REP3-95, AS-078) - Rev F01' (REP4-100).</p> <p>The Applicants maintain that all potential impact pathways to relevant European sites, specifically air quality impacts (see section 3.11 if Volume 3, Chapter 3: Onshore ecology and nature conservation (APP-075), have been adequately assessed and therefore have nothing further to add. The Applicants assume that this issue can be closed out given that no further consultation responses have been provided by Natural England in respect of this outstanding issue.</p>
RI_G32	Table 3.40 and section 3.11.6.2 give the breakdown of coastal saltmarsh loss temp (0.03ha) and permanent (0ha). Natural England advises the Applicant provide further information on where the 0.03ha of saltmarsh loss will occur.		The paragraph beneath Table 3.40 of Volume 3, Chapter 3: Onshore ecology and nature conservation (APP-075) clarifies that the 'coastal saltmarsh' habitat has been identified from the MAGIC priority habitat layer; however this does not correctly reflect the 0.03 ha of habitat that is present and temporarily affected at Lea Marsh BHS based on the Phase 1 Habitat survey undertaken (paragraph 3.11.10.3). Species-poor grassland is not an important ecological feature for the purposes of the impact assessment, and therefore losses of	No change.		<p>The Applicants note there is no change on this matter and refer Natural England to RI_G32 in 'S_D4_2.6 Annex 2.6 to Applicants' Response to Deadline 3 submissions from Statutory Consultees and other organisation: Natural England (REP3-90 - REP3-95, AS-078) - Rev F01' (REP4-100).</p> <p>The Applicants have nothing further to add on this point and assume that this issue can be closed out given that no further consultation responses have been provided by Natural England in respect of this outstanding issue.</p>

ID	Risk and Issue Log comment	RAG Status Rel and WR Rep and D1	Applicants' comment at Deadline 4 (in response to NE D3 submission)	Natural England's Comments/Update on Progression at Deadline 4	RAG D4	Applicants' comment at Deadline 5 (in response to NE D4 submission)
			this habitat type have not been quantified or assessed in the chapter.			
RI_G33	Although the Applicant has suggested that they will be using Natural England's District Level Licensing (DLL) Scheme, Natural England has not (as yet) approved the use of the DLL scheme for this project. Natural England has agreed in principle to the project using District level Licensing, however this is dependent on the availability of compensation ponds at the time of enquiry. Until an Impact Assessment and Conservation payment Certificate (IACPC) has been signed by the applicant and counter-signed by Natural England they cannot rely on District Level Licensing as a Licensing approach for this project.					
RI_G34	Natural England notes that in Table 3.15 the summary of key findings for species includes a potential outlying badger sett recorded within the Onshore Order Limits that appears disused. However, badgers are not considered further within Chapter 3, and no evidence is presented to confirm the outlying badger sett is not used. Badgers are a Protected Species under the 1992 Protection of Badgers Act, and it is the responsibility of the applicant to ensure they have sufficient evidence to demonstrate the proposal will not impact on protected species. Therefore, Natural England is unable to provide a Letter of No Impediment for Badger at this time.		The Applicants welcomes this response.			
RI_G35	Natural England notes the development is not subject to a mandatory net gain requirement and note the Applicant have outlined how they will deliver biodiversity benefit for areas of permanent habitat loss from permanent above-ground infrastructure using Defra BNG methodology and metric version 4.1 for the calculations. We also note that Lea Marsh BHS will be subject to habitat creation and enhancement measures. Unless there are changes in the design parameters we have no further comment to make during this examination.					
RI_G36	Natural England advise that topsoil bunds should not exceed 3m in height. Natural England advises that Application documents are updated to reflect best practice.		The Applicants notes this response.			
RI_G37	Natural England disagrees that the depth of subsoiling operations will depend on the nature		The Applicants welcomes this response.			

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	of the soil type affected and extent of any compaction that may have occurred. The depth of decompaction should reflect the depth of compaction. Natural England advises that the Applicant reconsider the information around soil compaction and consider producing an outline decompaction strategy to maximise the effectiveness of decompaction methods.					
RI_G38	<p>a) Natural England would welcome further discussion with the Applicant to determine the scale of impacts on the noctule hibernation bat roost and the judgement which their Ecologist has made regarding the possible abandonment of the noctule roost.</p> <p>b) If a licence is required, Natural England advise that quantitative data would be required on the roost, level of activity and use of the surrounding area.</p>		It is not considered that an EPS licence is required as the tree containing the noctule roost is outside the Order Limits and would be retained. The potential for disturbance during construction and subsequent abandonment of the roost was identified and assessed in the chapter as a worst-case scenario. Mitigation will aim to reduce the risk of disturbance (from construction noise and lighting) in the first instance once the construction activities to be undertaken at Penwortham are confirmed as part of the detailed design phase. The status of the roost, level of activity and use of the surrounding area would be captured through pre-construction surveys which are a commitment in the OEMP (CoT76). If it is subsequently determined that the level of disturbance and/ or damage to the roost (or any other roosts that may be identified during pre-construction surveys) would meet the threshold for EPS licensing, an application would be made to Natural England at that time.	No change.		<p>The Applicants note there is no change on this matter and refer Natural England to RI_G38 in 'S_D4_2.6 Annex 2.6 to Applicants' Response to Deadline 3 submissions from Statutory Consultees and other organisation: Natural England (REP3-90 - REP3-95, AS-078) - Rev F01' (REP4-100).</p> <p>The Applicants reiterate that they have committed to undertaking pre-construction surveys at the roost as set out in the OEMP (REP4-058) (CoT76). If it is subsequently determined that the level of disturbance to the roost would be such that an EPS mitigation licence would be considered necessary, an application would be made to Natural England. As the roost relates to a common and widespread species of bat (noctule), it is reasonable to assume that an EPS mitigation licence would be able to be secured from Natural England because the mitigation proposed is in line with standard guidance.</p>
RI_G39	Natural England advises that commitments should be made to ensure that updated badger surveys will be undertaken before works commence to confirm that no new setts have been created, and that the outlier sett remains disused.		The Applicants welcomes this response.			
RI_G40	<p>Sand lizard: Given the detail contained within Section 3.11.13, the described works would likely require an A46 derogation licence to cover disturbance, damage and possibly destruction of habitat due to the exit pits for the routing of the cable within and beneath known sand lizard habitat.</p> <p>Natural England advise that further detail including population size estimates, mitigation and compensation should follow in a draft licence submission.</p>		<p>The Applicants maintain the position that potential indirect disturbance effects from construction activities at the landfall site and temporary compounds do not meet the threshold for licensing. The Applicants also reiterate that there will be no damage or destruction of the dune habitats.</p> <p>The Applicants have provided an Outline Sand Lizard Mitigation Plan (S_D4_14) details the indirect disturbance impacts that have been considered and avoidance/mitigation measures that will be implemented.</p>	No change.		<p>The Applicants submitted an Outline Sand Lizard Mitigation Plan at Deadline 4 (REP4-117) and have subsequently revised this document following comments received from FBC at Deadline 4 and submitted at Deadline 5 (S_D4_14/F02).</p> <p>The Applicants have now agreed that an EPS mitigation licence would now be obtained from Natural England for construction activities at the landfall site, and a draft method statement that would form part of the application has been submitted at Deadline 5 (S_D4_22/F02).</p> <p>An EPS mitigation licence for the construction activities at the landfall would need be obtained post-consent (this would not be able to be obtained prior to consent through the DCO being granted),</p>

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						<p>and the Applicant is seeking agreement in principle from Natural England before the close of the examination that the proposed mitigation would be acceptable as part of a future licence application.</p> <p>A meeting was held with FBC on 5th September 2025 and it was agreed that further surveys undertaken by the Applicants would not provide any greater understanding of the sand lizard population at the Lytham St Anne's Dunes, given that existing survey data have been collected from multiple surveys across multiple years by the Fylde Sand Dunes Project and therefore represent a comprehensive dataset. FBC has subsequently shared further details on the sand lizard mitigation surveys with the Applicants, including the dates of surveys undertaken in 2022, 2023, 2024 and 2025, and a technical note has been submitted at Deadline 5 (S_D4_14/F02).</p>
RI_G41	Natural England advises that further information is required on the status of water vole burrows and the works to be undertaken in the water courses with water vole burrows present.		The Applicants welcomes this response.			
RI_G42	<p>a) Natural England advises the Applicant to clarify the location of otter resting places in relation to the watercourses which may be used within the Onshore Order Limits.</p> <p>b) Further information about the cable installation route, associated impacts and proximity to otter resting places would be required to determine the level of impacts posed.</p> <p>c) Natural England would expect works impacting a natal holt to be avoided.</p> <p>d) Natural England welcomes the proposed habitat restoration and CoT76, however there is minimal detail on how this will be monitored to know if this is compensating for the loss and degradation of habitat during construction.</p>		<p>All otter field signs recorded during surveys are reported and mapped in Volume 3, Annex 3.12: Otter survey technical report (confidential) (APP-086).</p> <p>The Applicants maintain that there has been a detailed assessment of the potential impacts of the projects to otter, and that appropriate mitigation has been identified, including the provision of temporary resting/ breeding habitat through enhancements to Lea Marsh.</p> <p>The Applicants have committed to undertake an extensive programme of pre-construction surveys for protected species including otter, acknowledging that the baseline conditions (such as the presence of otter couches and holts) can change in the intervening period between the completion of surveys and the commencement of construction. Should the surveys identify any otter couches or holts that cannot be avoided, a European Protected Species (EPS) mitigation licence would be sought from Natural England.</p> <p>The Applicants have committed to the adoption of trenchless crossing methods to cross all EA main watercourses in the Order Limits, including Savick Brook, River Ribble and Mill Brook, on which high levels of otter activity were recorded. It is therefore reasonable to assume that</p>	No change.		<p>The Applicants note there is no change on this matter and refer Natural England to RI_G42 in 'S_D4_2.6 Annex 2.6 to Applicants' Response to Deadline 3 submissions from Statutory Consultees and other organisation: Natural England (REP3-90 - REP3-95, AS-078) - Rev F01' (REP4-100).</p> <p>The Applicants have committed to undertaking pre-construction surveys for otter and would review the licensing requirements once the detailed design of the scheme has been completed. Any requirement for EPS mitigation licensing for otter would therefore be confirmed at that time.</p>

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			impacts to otter couches and holts would likely be entirely avoided.			
RI_G43	<p>There are several gaps in information regarding air quality emissions on designated sites during the construction, operational and decommissioning periods of the project. As a result, Natural England is unable to provide full comments on this impact pathway and state whether we agree with the conclusions on impacts on designated sites at present. These sites include: Lytham St Annes Dunes SSSI Newton Marsh SSSI Ribble Estuary SSSI Ribble and Alt Estuary SPA Ribble and Alt Estuary Ramsar Red Scar & Tun Brook Woods (Ancient Woodland & SSSI) In particular, Newton Marsh SSSI has been omitted from the air quality assessment and impacts on internationally designated sites (SPA/ SAC/ Ramsar) have not been considered, as highlighted in our previous [RR-1606].</p> <p>a) We advise that additional information is provided on air quality impacts, as advised in this RR and our previous RR ([RR-1601] Appendix G Onshore Ecology and Nature Conservation).</p> <p>b) Natural England advises for the aforementioned designated sites, air pollution impacts as a result of traffic, machinery and dust are considered and justification is provided for where impacts have been scoped out.</p>		<p>An assessment of potential air quality effects resulting from dust deposition arising during earthworks, construction and trackout on sensitive features of the Ribble and Alt Estuaries SPA and Ramsar, Ribble Estuary SSSI, Newton Marsh SSSI and Lytham St Annes Dunes SSSI has been undertaken in Volume 3 Chapter 9: Noise and Air Quality (APP-121) and the effects are assessed as negligible (paragraph 9.11.2.15).</p> <p>The designated sites scoped into the air quality assessment for construction vehicle emissions are listed in paragraph 1.1.1.4 of Volume 3 Annex 9.1 Air quality impacts on ecological designated sites (APP-122). As clarified in the previous response on this matter, in accordance with IAQM guidance, only ecological designations within 200 m of road links where the change in AADT flows exceed the relevant threshold are assessed.</p>	No change.		The Applicants note there is no change on this matter and refer Natural England to RI_G43 in 'S_D4_2.6 Annex 2.6 to Applicants' Response to Deadline 3 submissions from Statutory Consultees and other organisation: Natural England (REP3-90 - REP3-95, AS-078) - Rev F01' (REP4-100).
RI_G44	<p>The air quality assessment for designated ecological sites does not appear to consider sources of air pollution other than traffic and dust.</p> <p>Natural England advises that information on the use of machinery and equipment (including NRMM) is provided. This should include locations, duration of operations and minimum standard of NRMM and equipment with the potential to release pollutants which may impact designated sites, for both the construction areas and all temporary construction compounds. Air quality impacts for this pathway should include all statutory designated sites within a 200m screening distance from the machinery/NRMM, but is not limited to: Lytham St Annes Dunes SSSI</p>		The Applicants have responded previously in RR-1601 1601.G.58 (PDA-022). Please refer to aforementioned response.	No change.		The Applicants note there is no change on this matter and refer Natural England to RI_G44 in 'S_D4_2.6 Annex 2.6 to Applicants' Response to Deadline 3 submissions from Statutory Consultees and other organisation: Natural England (REP3-90 - REP3-95, AS-078) - Rev F01' (REP4-100).

ID	Risk and Issue Log comment	RAG Status Rel and WR Rep and D1	Applicants' comment at Deadline 4 (in response to NE D3 submission)	Natural England's Comments/Update on Progression at Deadline 4	RAG D4	Applicants' comment at Deadline 5 (in response to NE D4 submission)
	<p>Newton Marsh SSSI</p> <p>Ribble Estuary SSSI</p> <p>Ribble and Alt Estuary SPA</p> <p>Ribble and Alt Estuary Ramsar</p> <p>Red Scar & Tun Brook Woods (Ancient Woodland & SSSI)</p> <p>If impacts on these sites can be screened out, please provide justification on this.</p>					
RI_G45	<p>Newton Marsh SSSI is not included within the assessment of air quality impacts on designated sites, despite the SSSI being within 200m of the proposed works.</p> <p>We advise that all air quality impacts and sources of pollution (including impacts from traffic, dust and machinery/ equipment) are assessed for the SSSI.</p>		<p>The Applicants consider potential dust impacts on Newton Marsh SSSI have been adequately assessed (see paragraphs 9.11.2.11 to 9.11.2.15 in Volume 3 Chapter 9: Air quality).</p> <p>Potential vehicle emissions during construction have not been assessed for Newton Marsh SSSI in accordance with standard IAQM guidance, because the SSSI is not within 200 m of a road link where the change in AADT flows exceeds the threshold for assessment (paragraph 1.1.1.4 of Volume 3 Annex 9.1: Air quality impacts on ecologically designated sites lists the designations meet the threshold for assessment).</p>	No change.		<p>The Applicants note there is no change on this matter and refer Natural England to RI_G45 in 'S_D4_2.6 Annex 2.6 to Applicants' Response to Deadline 3 submissions from Statutory Consultees and other organisation: Natural England (REP3-90 - REP3-95, AS-078) - Rev F01' (REP4-100).</p>
RI_G46	<p>Natural England requires clarification of the level of NOx emissions at Red Scar & Tun Brook Woods (Ancient Woodland & SSSI).</p> <p>If the annual-mean NOx PC is 1% of CL or more, then we advise further assessment of NOx emissions on the SSSI is required and should be secured in the Outline Landscape and Ecological Management Plan (OLEM).</p>		<p>The Applicants reiterate that the screening threshold of 1% is not exceeded for NOx at Red Scar and Tun Brook Woods SSSI.</p>	No change.		<p>The Applicants note there is no change on this matter and refer Natural England to RI_G46 in 'S_D4_2.6 Annex 2.6 to Applicants' Response to Deadline 3 submissions from Statutory Consultees and other organisation: Natural England (REP3-90 - REP3-95, AS-078) - Rev F01' (REP4-100).</p>
RI_G47	<p>NH3, nitrogen deposition and acid deposition. Natural England notes that Paragraph 3.11.5.11 – 3.11.5.17 of [APP-075] assesses the impacts of exceedance of critical levels for NH3, nitrogen deposition and acid deposition. Despite critical levels being exceeded, the Applicant rules out impacts due to absence of lower plant communities or already exceeded thresholds.</p> <p>Natural England advises that evidence is required on the presence/ absence of lower plant species within the area of exceedance of 1% threshold within the SSSI.</p>		<p>The Applicants consider that the assessment of potential impacts of NH3, nitrogen deposition and acid deposition to the SSSI is adequate and that the construction of the Transmission Assets will not result in any significant effects to the designated features.</p>	No change.		<p>The Applicants note there is no change on this matter and refer Natural England to RI_G47 in 'S_D4_2.6 Annex 2.6 to Applicants' Response to Deadline 3 submissions from Statutory Consultees and other organisation: Natural England (REP3-90 - REP3-95, AS-078) - Rev F01' (REP4-100).</p>

3.10 Risk and Issues Log – Onshore and Intertidal Ornithology

Table 3-10: Responses to questions regarding Onshore and Intertidal Ornithology

ID	Risk and Issue Log comment	RAG Status Rel and WR Rep and D1	Applicants' comment at Deadline 4 (in response to NE D3 submission)	Natural England's Comments/Update on Progression at Deadline 4	RAG D4	Applicants' comment at Deadline 5 (in response to NE D4 submission)
Risk and Issues Log Deadline 1 – Onshore and Intertidal Ornithology Taken from Natural England's Relevant and Written Representations Morgan and Morecambe Transmission Assets Appendix H - Onshore and Intertidal Ornithology						
RI_H1	<p>Surveys of intertidal and terrestrial wintering birds and terrestrial breeding birds have been completed to a minimal viable level on areas within the onshore order limits, with some areas within the red line boundary only being partially surveyed. Additionally, there is a lack of survey effort of surrounding areas in close proximity to work areas which are likely to be disturbed by construction works. Natural England's expectations are that two years of full survey are undertaken across the whole area plus the buffer to inform decision making. As further survey is unlikely to inform the Examination process due to time constraints, when considering the predictions of the Environmental Statement, the survey data should only be taken as a conservative assessment of the populations present and therefore the level of risk, rather than a precautionary one.</p>		<p>The Applicants assert that the survey coverage has actually surpassed that of comparable DCO projects:</p> <ul style="list-style-type: none"> Disturbance buffers – The Applicants note that this was done, and they have made it clear in their application documents that the survey area includes a 500 m survey buffer to all onshore and intertidal infrastructure areas (F3.4.1 Volume 3, Annex 4.1: Breeding birds technical report – APP-091; F3.4.2 Volume 3, Annex 4.2: Wintering and migratory birds technical report – Part 1 of 2 – APP-092; F3.4.3 Volume 3, Annex 4.3: Intertidal birds technical report – APP-094 and F3.4.4 Volume 3, Annex 4.4: Onshore and intertidal ornithology survey methodologies – APP-095), and that these were surveyed over two years. The Applicants would welcome Natural England's response as to why 500 m is not deemed a sufficient buffer zone, especially considering other similar cable burial projects have used this distance or lower. The Applicants also note that this buffer was presented to Natural England during EWG01, throughout the EWG process, and again at PEIR, and at no point did Natural England raise any concerns. Intertidal surveys – The Applicants note that both the spatial and temporal coverage for the intertidal surveys was 100% of that requested by Natural England at the scoping stage. In total 288 diurnal survey counts were made during the passage period over two years at both the landfall and the River Ribble crossing, in addition a further 36 nocturnal counts were made at the landfall. Spatial coverage of the study areas (including the 500 m buffer) was 100% during all surveys. These counts covered all tidal states and were conducted at all hours of the day and night. The Applicants are unclear why Natural England feel that this represents the minimal viable level, especially as the survey approach was agreed with Natural England during the Evidence Plan Process. Wintering bird surveys – In comment Natural England appear to agree that survey coverage for 	No change.		The Applicants are awaiting Natural England's response to the Applicants' D4 submissions.

ID	Risk and Issue Log comment	RAG Status Rel and WR Rep and D1	Applicants' comment at Deadline 4 (in response to NE D3 submission)	Natural England's Comments/Update on Progression at Deadline 4	RAG D4	Applicants' comment at Deadline 5 (in response to NE D4 submission)
			<p>the terrestrial waterbird surveys was good <i>“Figure 1.8 illustrates a <u>good coverage of surveying in 2022/23, with some gaps e.g. west end of Newton Marsh SSSI. The survey coverage in 2023/24 was good</u>”</i>. The Applicants note that coverage from the supplementary winter walkover surveys was patchier, however would like to stress that the data from these surveys were not used to inform the assessment of SPA features or annex 1 species but instead to fully characterise use by passerines such as starling or winter thrushes upon which there will be limited potential impacts.</p> <ul style="list-style-type: none"> • Breeding bird surveys – Whilst the Applicants acknowledge that there were survey gaps they would like to note that the breeding bird surveys did inform the ISAA as there are no breeding gull or tern colonies within the habitats available within the onshore ornithology survey area. The breeding bird survey coverage achieved by the Applicants far exceeds that of similar projects both spatially and temporally. Unlike other linear infrastructure DCO projects, the Applicants have conducted surveys over two years, this has led to a maximum number of visits of nine which exceeds the six from the Hornsea 3 and 4 projects and triples that of Awel y Mor. Spatial coverage of areas of over six visits equates to 35.97% of the survey area (including the 500 m disturbance buffer) or 13,131,540m². This is compared against figures of 1,979,208m² and 1,256,640m² from the much larger Hornsea projects 3 and 4 (53km and 39km corridors respectively compared to circa. 30km for Transmission Assets). <p>The Applicants are therefore unclear on Natural England position that the onshore and intertidal surveys <i>“have [only] been completed to a minimal viable level”</i> and would seek Natural England's acknowledgement that coverage has in fact been good.</p>			
RI_H2	The construction works are expected to last 66 months – this is a long term, albeit not permanent, time to be having an impact when measured in avian terms. The WCS could therefore mean that all birds impacted would be displaced from the entire terrestrial work area for the full 66 months. Natural England advise that the Applicant should consider phasing the works so that only a proportion of the terrestrial works corridor are impacted at any one		The Applicants direct NE to Q1.13 of the 'Applicants' Response to Examining Authority's Written Questions (ExQ1)' (REP3-056) where the construction phases and scenarios are provided in detail.	No change.		No change, the Applicants direct NE to Q1.13 of the Applicants' Response to Examining Authority's Written Questions (ExQ1)' (REP3-056) where the construction phases and scenarios are explained in detail.

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	time. This will greatly reduce the risk that the works present.					
RI_H3	<p>Ribble and Alt Estuaries SPA/Ramsar site – inadequate assessment of wintering intertidal features</p> <p>There is not currently enough information within the Application to accurately identify and assess the impacts for wintering and passage features of Ribble and Alt Estuaries SPA/Ramsar site. Natural England advise that the Applicant should update the report to inform a HRA document to reflect the recorded numbers in the affected area, not a questionable area-based measure of habitat availability. A more detailed assessment of the usage of this area by SPA/Ramsar site species and the spatial and temporal patterns of that usage is required to understand the impacts of the proposal and inform mitigation strategies.</p>		<p>The Applicants note that during Deadline 2 they submitted S_D2_12 Technical note on the energetics of the birds at landfall and the adequacy of the Fairhaven Saltmarsh - Rev F01 (REP2-045). Within this the number of birds and frequency of counts was explored, the mean number of SPA passage features expected to be impacted during the construction activities on the intertidal areas of the landfall:</p> <ul style="list-style-type: none"> • Ringed plover – 0.57 • Dunlin – 3.63 • Sanderling – 5.61 • Redshank – 0.13 <p>In addition to the low numbers of birds that regularly use the impacted areas at the landfall, the impacts are temporary and reversible, therefore there can be no lasting adverse effects on site integrity.</p> <p>The Applicants remain fully committed to addressing these matters and to working collaboratively with Natural England to reach a resolution. In support of this commitment, the Applicants met with Natural England on 25 July 2025 and are working closely with Natural England to address this issue and are currently in discussions about measures to reduce impacts at source.</p> <p>Following Issue specific hearing 2 (ISH2), the Applicants are submitting, at Deadline 4, a note providing clarification on their current position with Natural England concerning the Adverse Effect on Integrity including additional source-level mitigation and the Fairhaven saltmarsh mitigation area (AEol - ISH2.12).</p> <p>In the case that these address Natural England's concerns, they have been clear in their response to ExA Q6.1.2 (REP3-095) that:</p> <p><i>"Were the Applicant able to reduce disturbance effects at the landfall during the passage season to acceptable levels through mitigation, it would offer in our view sufficient certainty to rule out adverse effects. Were this to be the case, the Fairhaven Saltmarsh proposal could be seen as either addressing the residual, non-AEol effects of the development, or alternatively as an enhancement measure."</i></p>	<p>In progress. On 25/07/2024 Natural England attended a meeting with the Applicant to discuss onshore ornithology matters: impacts on passage waterbirds at landfall, the proposed management at Fairhaven saltmarsh, and the measures proposed to address the loss of Functionally Linked Land affected by the onshore cable route. Prior to the meeting we provided the Applicant with our late submission at Deadline 3 [AS-078] which provided advice on these matters. We advised the Applicant to utilise our advice given through Examination and DAS thus far and will review new documents/updated documents once submitted into Examination.</p>		<p>Following a meeting with Natural England on 16th September 2025 further clarification was provided, which allowed Natural England and the Applicants to agree that subject to the Applicants submitting further information into Examination at Deadline 5, (which was discussed during the meeting and subsequently over email), Adverse Effect on Integrity on the Ribble and Alt Estuaries SPA and Ramsar sites can be ruled out, due to the adoption of mitigation measures at the landfall location for the passage periods. The mitigation measures included for the passage period include screening around the compounds on Lytham St Annes beach and employment of an Ecological Clerks of Work who will be on site during landfall construction operations. It is agreed that the Fairhaven Saltmarsh scheme is an alleviation measure which aims to address the residual impacts from the development and reduce existing pressures on ornithological features of the SPA and Ramsar sites, including those species which may be affected by the works in the intertidal area.</p>
RI_H4	Adverse effects on the Ribble and Alt Estuary SPA and Ramsar site due to landfall works		See RI_H3 above	No change. Our comment in RI_H3 is also applicable here.		See RI_H3 above.

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	<p>The landfall site and adjacent areas supports very significant numbers of SPA/Ramsar site birds during the winter and passage periods. However, the Applicant only proposes some limitations to working during these sensitive periods – a limit of 5 weeks working in November-February, with no restrictions to working outside this period. This approach both to the winter period (which we consider to run from November to March inclusive) and the lack of any restriction during passage periods will provide insufficient mitigation. In the absence of a full seasonal restriction for the appropriate periods, or a compelling case that a lower level of restriction is acceptable, Natural England advises that an AEOI cannot be ruled out.</p> <p>A comprehensive seasonal restriction for the sensitive winter and passage periods should be carefully considered in, with the relevant months should be identified with respect to site-specific data and SPA conservation advice.</p>					
RI_H5	<p>Unless an effective seasonal restriction can be committed to, we advise that an in-principle derogations case for the Ribble and Alt Estuaries SPA/Ramsar site will need to be developed under the Habitats Regulations, demonstrating that there are no alternative solutions and Imperative Reasons of Overriding Public Interest, including that a greater level of seasonal restriction is not achievable.</p> <p>In this light, the proposed roosting refuge would constitute compensatory measures under the Habitats Regulations. Accordingly, a far more detailed submission regarding the installation and management of the compensatory measures is needed addressing Natural England's concerns, and a compensation schedule in the DCO added.</p> <p>To ensure the compensatory measures are targeted and effective, it is critical that the significance of the affected area for SPA and Ramsar site species and their specific requirements from it are adequately described. Additionally, the</p>		See RI_H4 above	<p>Progressed but not resolved. On 25/07/2024 Natural England attended a meeting with the Applicant to discuss onshore ornithology matters. Impacts on passage waterbirds at landfall was discussed and further advice is included in our submission at Deadline 3 [AS-078]. In discussion with the Applicant they outlined a new potential commitment aimed at reducing the impacts to passage features at landfall. We provided verbal advice in the meeting and then detailed written advice. If and when this is submitted into Examination we will provide advice as required.</p>		<p>Following a meeting with Natural England on 16th September, it was agreed that the measures proposed at Fairhaven saltmarsh are an alleviation measure, and as Natural England are satisfied that there is no Adverse Effect on Integrity on the Ribble and Alt Estuaries SPA and Ramsar sites due to the construction activities at landfall. Therefore, there is no need for an in-principle derogation case. This is the view of both the Applicants and Natural England.</p>

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	Applicant should provide evidence that the use of the proposed area is currently compromised by disturbance (noting it falls within the SPA), and that the energy saving for the compensation proposal will be sufficient to offset impacts.					
RI_H6	<p>Ribble and Alt Estuaries SPA/Ramsar – inadequate assessment of impacts on terrestrial waterbirds:</p> <p>Natural England do not agree with the Applicant's HRA conclusions. We note that the current conclusions are based on modelled information on likely habitat availability. This is often based on out-of-date information and models that claim urban/infrastructure areas are available foraging habitat. The focus should be on the populations revealed by the site-specific surveys rather than generic assumptions. Furthermore, there is a lack of information regarding the spatio-temporal implications of the habitat loss.</p> <p>With regards to mitigation, we advise that the Applicant provides further information on how the tunnel end works of the Ribble crossing will be managed to ensure no disruption to SPA/Ramsar site waterbirds moving along the corridor of the estuary. The justification of only using trenchless techniques is inadequate.</p>		<p>The Applicants note the conclusions of the assessment presented within the Habitats Regulations Assessment Stage 2, Information to Support an Appropriate Assessment Part Three –Special Protection Areas (SPA) and Ramsar Site assessments (APP-017) are based on the maximum peak number of birds (derived from site-specific surveys) combined with a habitat availability approach that considers the species' foraging ranges. This approach informs the proportion of potential suitable habitats within the SPA that are affected by the proposed work. This Approach is deemed to be robust to determine AEOI.</p> <p>The Applicants welcome Natural England's confirmation of noAEOI at the River Ribble crossing.</p>	<p>Progressed but not resolved. On 25/07/2024 Natural England attended a meeting with the Applicant to discuss onshore ornithology matters including the measures proposed to address the loss of Functionally Linked Land affected by the onshore cable route. We provided the Applicant with our late submission at Deadline 3 [AS-078] which provided advice on this matter, including information advising on the need for further detail on phasing of works. We will review any new documents/updated documents once submitted into Examination.</p>		<p>The Applicants submitted the following documents at Deadline 4 and are currently awaiting a response from Natural England:</p> <ul style="list-style-type: none"> • S_D4_17 Onshore Terrestrial Waterbird Note - Rev F01 (REP4-120) • J6 Outline Ecological Management Plan (Clean) - Rev F04 (REP4-058) <p>The Applicants welcome Natural England's comments on these documents.</p> <p>In addition, The Applicants have updated; HRA Stage 2 ISAA Part 3 (E2.3) and submitted the revised version at Deadline 5 (E2.3/F02); J6 Outline Ecological Management Plan (J6/F05) as requested by Natural England. The further detail required by Natural England on the 16th September can be found in Appendix B of the oEMP.</p>
RI_H7	<p>Ribble & Alt Estuaries SPA – mitigation for terrestrial impacts/compensation</p> <p>The proposed mitigation measures are hoping to support the needs of a number of species with different ecological needs, however no information is included showing clear design and management information to ensure that these areas are going to be fit for purpose.</p> <p>The terrestrial mitigation areas need reviewing against the specifics of the species (and the number of those species) that they need to host, which relates to the above comments around the phasing of works and being able to accommodate all displaced birds from the whole onshore order limits. Detailed</p>		<p>The Applicants have provided an update on these issues at Deadline 4 within a Terrestrial Waterbirds technical note (S_D4_17) and updates to the OEMP (J6 Outline Ecological Management Plan. APP-212) to reflect how the mitigation will provide for all species.</p>	<p>Progressed but not resolved. On 25/07/2024 Natural England attended a meeting with the Applicant to discuss onshore ornithology matters including measures proposed to address the loss of Functionally Linked Land affected by the onshore cable route. Prior to the meeting we provided the Applicant with our late submission at Deadline 3 [AS-078] which provided advice on this matter including the type of additional detail we advise is necessary to be confident the mitigation areas (Lytham Moss and land near Newton-with-Scales) will deliver for the species potentially affected during construction. We will review any new documents/updated documents once submitted into Examination.</p>		<p>The Applicants submitted the following documents at Deadline 4 and are currently awaiting a response from Natural England:</p> <ul style="list-style-type: none"> • S_D4_17 Onshore Terrestrial Waterbird Note - Rev F01 (REP4-120) • J6 Outline Ecological Management Plan (Clean) - Rev F04 (REP4-058) <p>The Applicants welcome Natural England's comments on these documents.</p> <p>In addition, The Applicants have updated; HRA Stage 2 ISAA Part 3 (E2.3) and submitted the revised version at Deadline 5 (E2.3/F02); J6 Outline Ecological Management Plan (J6/F05) as requested by Natural England.</p> <p>In a meeting with Natural England on 16th September it was discussed that they were generally happy with the conclusions for FLL set out in REP4-120. However,</p>

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	site assessments that articulate site management and structure in relation to the role they need to fulfil need to be generated.					Natural England requested that FLL for shelduck was considered and that mitigation was provided for this species. The Applicants have duly included shelduck as a species for which temporary mitigation is provided. Specifically, the Applicants intend to provide muddy pools for shelduck at Lytham Moss. This further detail can be found in Appendix B of the oEMP.
RI_H8	The potential impacts on Newton Marsh SSSI have not been adequately assessed. There is minimal information on what works will take place in close proximity to this site and how the work will be managed to not affect the site with respect to visual and noise disturbance. Further justification should be provided on how the Applicant has concluded no risk to the site. Proper consideration of this area is also applicable to the HRA as the site is well used by SPA birds, particularly in winter.		The Applicants welcome Natural England's decision of no AEOI at Newton Marsh SSSI. The Applicants have committed to update information in HRA Stage 2 Information to Support an Appropriate Assessment Part Three (APP-017) at Deadline 5.	No change - we look forward to sight of an updated ISAA.		The Applicants have updated the HRA Stage 2 ISAA Part 3 (E2.3) and submitted the revised version at Deadline 5 (E2.3/F02).
RI_H9	Reliance on the Functionally Linked Land (FLL) description in Bowland Ecology (2021) is flawed for the purposes of this survey. Natural England do not agree with the criteria used for FLL threshold. Natural England requires further information on reasoning for not using standard 1% threshold for measuring significance of FLL. Further, Natural England advises the Applicant to ensure all figures for species are included and consider the possibility of FLL for the species referenced.		The Applicants have provided more detailed information on the full suite of SPA species occurring in numbers exceeding 1%, based on baseline surveys. This information has been presented to Natural England on 25 July and is included in the Terrestrial Waterbirds technical note (S_D4_17) at deadline 4.	Progressed but not resolved. In the meeting on 25/07/25 the Applicant and Natural England discussed the birds utilising the onshore cable corridor as FLL in significant numbers (greater than 1% of the SPA population). We advised on additional detail the Applicant should submit at a subsequent deadline to help resolve this matter.		<p>The Applicants submitted the following documents at Deadline 4 and are currently awaiting a response from Natural England:</p> <ul style="list-style-type: none"> • S_D4_17 Onshore Terrestrial Waterbird Note - Rev F01 (REP4-120) • J6 Outline Ecological Management Plan (Clean) - Rev F04 (REP4-058) <p>The Applicants welcome Natural England's comments on these documents.</p> <p>In addition, the Applicants have committed to providing updates in the oEMP (J6 Outline Ecological Management Plan (J6/F05)).</p> <p>In a meeting with Natural England on 16th September it was discussed that they were generally happy with the conclusions for FLL set out in REP4-120. However, Natural England requested that FLL for shelduck was considered and that mitigation was provided for this species. The Applicants have duly included shelduck as a species for which temporary mitigation is provided. Specifically, the Applicants intend to provide muddy pools for shelduck at Lytham Moss. This further detail can be found in Appendix B of the oEMP.</p>
RI_H10	Natural England requires clarification on the lapwing data and queries why the two years of data are being listed out separately, when the data represents two phases of one survey.					

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RI_H11	Natural England do not agree with the justification for not following the SNH (2017) guidelines and require further information on mitigation for the impacts. Although construction is temporary, impact risk will largely depend on construction approach (and some permanent infrastructure/potential permanent land use change in mitigation areas), which could last up to 66 months.		<p>The Applicants note that the SNH guidance, which was developed to address the permanent, generational impacts of wind turbines—such as increased mortality resulting from permanent displacement and collision risks—is not proportionate when applied to the temporary and reversible impacts of construction activities at the cable corridor. Furthermore, the reversible impacts are to be mitigated by supplementary feeding at Lytham Moss.</p> <p>The Applicants would like to draw attention to Natural England's advice provided to Outer Dowsing Offshore Wind Farm (Relevant Representations of Natural England for the construction and operation of the Outer Dowsing Offshore Wind Farm located approximately 54km from the Lincolnshire Coast in the Southern North Sea).</p> <p><i>"Provisioning of grain and / or sugar beet at an undisturbed location elsewhere along the Norfolk coast could provide an alternative foraging resource, offsetting any effects of displacement due to development. It is anticipated such work could be delivered at a considerable cost-saving to developers; removing the need for crop-mapping, goose surveys and complex energetic modelling which might, regardless, still lead to a requirement for some form of mitigation."</i></p> <p>It is noted that this area specific but Natural England also state that:</p> <p><i>"It is Natural England's view that it is possible to extrapolate the principles of this advice in regard to avoidance and supplementary feeding as mitigation for sustainable development projects impacting on Annex I geese at other locations."</i></p> <p>The Applicants note that the inclusion of the feeding as mitigation should therefore negate the need for any surveys.</p>	No change.		The Applicants note there is no change on this matter and refer Natural England to RI_H11 in 'S_D4_2.6 Annex 2.6 to Applicants' Response to Deadline 3 submissions from Statutory Consultees and other organisation: Natural England (REP3-90 - REP3-95, AS-078) - Rev F01' (REP4-100).
RI_H12	It is unclear from the report for geese, ducks and swans, waders and gulls and terns if this is referring to birds that are actually breeding or commenting on non-breeding birds gathering in the breeding season. Natural England advise the Applicant that reporting on non-breeding gatherings during the breeding season would be better presented as a separate report/separate section.					
RI_H13	Natural England notes the incomplete coverage in the survey (0-9 visits = incomplete coverage.) Natural England advises that all areas should have received some survey visits, and that					

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	the gaps in coverage inevitably reduce the confidence in the assessment conclusions as regards number and distribution of birds.					
RI_H14	Natural England note that a number of these species are also non-breeding interest of the Ribble and Alt Estuary SPA and there may be functional linkage. Natural England advises the Applicant to consider the potential for FLL for these species and whether there is potential to impact if so.		The Applicants commit to providing more detailed information on the full suite of SPA species occurring in numbers exceeding 1%, based on baseline surveys. This information was presented to Natural England on 25th July and is included in the Terrestrial Waterbirds technical note (S_D4_17) at Deadline 4.	No change.		The Applicants submitted the following documents at Deadline 4 and are currently awaiting a response from Natural England: <ul style="list-style-type: none"> S_D4_17 Onshore Terrestrial Waterbird Note - Rev F01 (REP4-120) J6 Outline Ecological Management Plan (Clean) - Rev F04 (REP4-058) The Applicants welcome Natural England's comments on these documents. The Applicants note that Natural England are in agreement that if shelduck are included in this list then all species for which FLL exist have been considered. The Applicants have duly included shelduck in their suite of species with FLL and for which mitigation is primarily aimed at. The Applicants have updated Appendix B of the oEMP for D5 (J6 Outline Ecological Management Plan (J6/F05)) to include the additional information requested by Natural England and are providing mitigation for shelduck at Lytham Moss.
RI_H15	Natural England note the survey limitations are reasonably well characterised, however it is not clear if survey effort was sufficient for 'difficult' species. For example, breeding waterfowl, raptors and crepuscular species. The Applicant should provide clarity on survey effort limitations for species which are considered more difficult to survey.					
RI_H16	Whilst Natural England acknowledges the consideration of Chapter 9 Air Quality [APP-121], as these impacts could also relate to onshore and intertidal ornithology, they should be assessed within this chapter.					
RI_H17	The Applicant still intends to carry out up to five weeks of work during the high sensitivity period of November - March inclusive. Natural England advises that all potentially disturbing works should be excluded over this period. We also advise consistency when defining the over-wintering period, which should be the same across all documents and commitments.		The Applicants welcomes this response.			

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RI_H18	Natural England requires more information to ascertain why the following statement could be impossible when there is uncertainty regarding the origin of the birds: <i>"the 353 lesser black-backed gull reported in Table 1.67 cannot all belong to the Ribble and Alt SPA, Morecambe Bay and Duddon Estuary SPA and Ramsar, and the Bowland Fells SPA."</i>					
RI_H19	The citation counts and the peak count recorded during the site-specific surveys identifies that many (almost all) species are at >1% of citation value and > 1% of most recent count (noting that this is only noted for Ribble and Alt Estuary SPA for most species). These surveys indicate the importance of the area and the subsequent importance of mitigation, predominantly all at >1%.					
RI_H20	Natural England advise that Morecambe Bay and Duddon Estuary SPA and Morecambe Bay Ramsar are two separate sites and have different geographical boundaries. Duddon Estuary Ramsar should also be considered and is a separate site.					
RI_H21	Natural England advise the inclusion of the most up to date digital aerial survey for the Bowland Fells Lesser Black-backed Gull Colony Count.					
RI_H22	Over 2% of golden plover were found on the area of permanent habitat loss. Although the area represents 0.04% of the total foraging range, the number of golden plover using the area implies it is an important area. Natural England advises the Applicant consider why it may be preferentially used by golden plover, and how this will be replicated in the mitigation areas.		<p>The Applicants have responded previously in RR-1601 1601.H.28 (PDA-023).</p> <p>The Applicants continue to disagree with Natural England's assertion that the land is preferentially used by over 2% of the SPA population as this would also be determined by frequency. Golden plover were only recorded once out of 14 survey visits.</p> <p>As a precautionary measure, the Applicants have proposed mitigating impacts on birds based on the average number potentially affected by permanent habitat loss, estimated at 0.2% of the SPA population.</p> <p>The Applicants also note that the area of proposed mitigation is similar in size to that being lost and also that the grassland will be managed to increase prey resource at Newtown-with-Scales. This, combined with the open aspect and scrapes which will provide roosting opportunities, will provide adequate mitigation for the infrequent use of the pasture at the substations.</p>	No change. RI_H7 is also applicable here.		<p>The Applicants submitted the following documents at Deadline 4 and are currently awaiting a response from Natural England:</p> <ul style="list-style-type: none"> S_D4_17 Onshore Terrestrial Waterbird Note - Rev F01 (REP4-120) J6 Outline Ecological Management Plan (Clean) - Rev F04 (REP4-058) <p>The Applicants welcome Natural England's comments on these documents.</p> <p>The Applicants have provided further detail in Appendix B of the oEMP (J6 Outline Ecological Management Plan (J6/F05)) at D5 as requested by Natural England.</p>

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			The Applicants have provided an updated OEMP (J6 Outline Ecological Management Plan. APP-212) at Deadline 4 to reflect how the mitigation will provide for golden plover.			
RI_H23	Natural England requires further information from the Applicant to understand if any appraisal has been made to quantify if the proposed mitigation/compensation ground is sufficient to mitigate the loss. Regularity of usage is an important factor to understand if mitigation areas will reliably accommodate the additional displaced birds.		See above, golden plover were only recorded within the substation footprint once out of 14 surveys, therefore the average number of birds was 7.4 or 0.2% of the SPA citation. Therefore, the Applicants believe that the proposed mitigation is more than adequate to accommodate this small number of birds, especially considering that the mitigation area is similar in size to the area being lost.	No change. RI_H7 is also applicable here.		<p>The Applicants submitted the following documents at Deadline 4 and are currently awaiting a response from Natural England:</p> <ul style="list-style-type: none"> S_D4_17 Onshore Terrestrial Waterbird Note - Rev F01 (REP4-120) J6 Outline Ecological Management Plan (Clean) - Rev F04 (REP4-058) <p>The Applicants welcome Natural England's comments on these documents.</p> <p>Within sections 2.2.7 and 4.2 in REP4-120, and Appendix B of REP4-058, queries regarding the suitability of the mitigation for golden plover are fully addressed.</p>
RI_H24	Langley et al., (2022). appears to have been omitted from the references. Update the document to include the reference as cited.					
RI_H25	The figures set out in Table 1.76 [APP-017] appear to only represent the area of physical ground disturbance arising from the proposal not visual or acoustic disturbance which will extend some 100's of meters (varying between species) from the works. Temporary habitat loss will therefore be much greater than suggested in the MDS. Further, recovery time of disturbed ground needs to be considered as there is minimal mention of recovery time beyond completion of works.		<p>The Applicants have responded previously in RR-1601 1601.H.31 (PDA-023).</p> <p>The Applicants acknowledge Natural England's comment regarding habitat recovery. This is addressed in paragraph 1.4.1.4 of the "S_D2_12 Technical Note on the Energetics of the Birds at Landfall and the Adequacy of the Fairhaven Saltmarsh - Rev F01 (REP2-045).</p>	No change.		<p>The Applicants have been clear in their response to Natural England that the assessment of disturbance has already fulfilled Natural England's requirement that the disturbance buffer plus the area of works is to be fully assessed (for further details see section 1.6.3.194 and Table 1.93 in E2.3 Habitats Regulations Assessment Stage 2 Information to Support an Appropriate Assessment Part Three – Special Protection Areas (SPA) and Ramsar Site assessments. APP-017). Therefore, it makes little sense to assess the area of physical habitat loss as being greater than is actually the case.</p> <p>The Applicants therefore seek clarification as to what else Natural England require as both disturbance and habitat loss have been fully assessed.</p>
RI_H26	Natural England strongly advises the Applicant to provide further information on the onshore works and ensuring work is staggered appropriately. We suggest the Applicant either needs to provide information to ensure that the mitigation areas really can support all disturbed features in the terrestrial area for the whole period or the Applicant need to identify a works approach that reduces the risk at any one point in time		The Applicants have responded previously in RR-1601 1601.H.33 (PDA-023).	No change.		The Applicants note there is no change on this matter and refer Natural England to RI_H26 in 'S_D4_2.6 Annex 2.6 to Applicants' Response to Deadline 3 submissions from Statutory Consultees and other organisation: Natural England (REP3-90 - REP3-95, AS-078) - Rev F01' (REP4-100).

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	(but still ensure that the mitigation land can support the scaled down risk).					
RI_H27	Natural England notes that there is a definite impact for 24 months at this fixed point (400kV grid connection cable). We further note that there does not appear to be any identified mitigation for the risk of light and noise affecting the river corridor. Natural England advise the Applicant to review work approaches and clarify how risk from sound/light disturbance is to be mitigated for a period of up to 24 months.		The Applicants welcome Natural England's decision to rule out AEOL at the River Ribble crossing. The Applicants have committed to update information in HRA Stage 2 Information to Support an Appropriate Assessment Part Three (APP-017) at Deadline 5.	No change - we look forward to sight of an updated ISAA.		The Applicants have updated the HRA Stage 2 ISAA Part 3 (E2.3) and submitted the revised version at Deadline 5.
RI_H28	Natural England note that while it is correct that pink-footed geese do not forage in the intertidal they do roost on the intertidal, which will not have been captured in the 'overlap analysis' and should be included.					
RI_H29	Natural England do not agree with the whole meta-population approach based on a radius around different roosts. This is not appropriate methodology for SPA site-based assessment. The applicant's survey data identifies the risk they should be considering through their determination of the size of the population that will be impacted. Apportioning by site would be appropriate for the assessment.		The Applicants have previously addressed this matter in RR-1601 1601.H.36 (PDA-023). The Applicants point out that the assessment accounts for both the proportion of the relevant SPAs and the metapopulation. For example, in paragraph 1.6.3.111 of APP-017, the Applicants state that this equates to "70.72% of the SPA citation count of pink-footed goose, or 21.45% of the current WeBS SPA count, or 14.9% of the metapopulation." Accordingly, the Applicants do not consider this to be a concern and observe that apportioning would likely result in a less precautionary assessment.	Progressed but not resolved. Comment RL_H9 is also relevant here.		The Applicants note there is no change on this matter and refer Natural England to RI_H29 in 'S_D4_2.6 Annex 2.6 to Applicants' Response to Deadline 3 submissions from Statutory Consultees and other organisation: Natural England (REP3-90 - REP3-95, AS-078) - Rev F01' (REP4-100).
RI_H30	"Eleven Ribble and Alt Estuaries SPA ornithological features were present within the intertidal environment at the landfall, 9 of which are at >1% SPA. The Applicant should ensure all >1% SPA features are taken through to LSE and AA as significant risks are present to all these features.					
RI_H31	Natural England requires the Applicant to provide clarification on the beach/landfall Direct Pipe Trenchless installation. Natural England note the commitment to minimise time spent in the intertidal period, however we require clarification on whether the stated two-week period of beach works per cable include delivery and set up/removal of equipment and what will be the risk to the foreshore associated with cable pull.		The Applicants welcome this response. The Applicants have committed to update information in HRA Stage 2 Information to Support an Appropriate Assessment Part Three (APP-017) (for onshore and offshore ornithology) at Deadline 5.			The Applicants have updated the HRA Stage 2 ISAA Part 3 (E2.3) and submitted the revised version at Deadline 5.

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RI_H32	Natural England notes that Still et al. (2015) is repeatedly cited but is not included in the reference list. The study is heavily used as to discuss various species; however, the study is 10 years old and considers bird distribution in a dynamic environment, therefore it may not be that it can be relied upon.					
RI_H33	The ES predicts the proposal will affect over 2% of 9 species; of which 3 have more than 10% of population potentially affected. Natural England notes these figures do not account for disturbance, which could potentially affect a greater area, resulting in larger areas of temporary habitat loss. Natural England do not support the assertion that the percentage of features affected is not significant because the SPA is big. For wintering intertidal features; Natural England do not agree with the conclusion of a negligible impact from a temporary loss of supporting habitat and/or resource availability – the Applicant need to identify the actual disturbance footprint and confirm that the figures of birds at risk reflect this and not just the direct area being worked over.		See RI_H4 above for response to the intertidal waterbirds. The Applicants have provided further clarification on the species for which FLL exists and how the proposed mitigation provides for these in the Terrestrial Waterbirds technical note (S_D4_17) at Deadline 4.	No change. RI_H3 is also applicable here.		The Applicants have been clear throughout that disturbance has been fully assessed according to species specific disturbance buffers in addition to the area of construction (for further details see the response to RI_H25, and section 1.6.3.194 and Table 1.93 in E2.3 Habitats Regulations Assessment Stage 2 Information to Support an Appropriate Assessment Part Three – Special Protection Areas (SPA) and Ramsar Site assessments. APP-017). The Applicants and Natural England have now come to agreement that there will be No AEol for intertidal features due to the commitment to avoid the sensitive winter period (CoT129), and the alleviation measures for the passage features at Fairhaven Saltmarsh (CoT113). In addition, at D4 the Applicants have provided further information on the suitability of mitigation areas for the terrestrial features in: <ul style="list-style-type: none"> S_D4_17 Onshore Terrestrial Waterbird Note - Rev F01 (REP4-120) J6 Outline Ecological Management Plan (Clean) - Rev F04 (REP4-058) In particular, section 2 and Table 14 in REP4-120 address the issue of which species are reliant upon FLL in the Zol. The Applicants are awaiting Natural England's response to these documents.
RI_H34	For passage intertidal features Natural England do not agree with the conclusion that impacts can be ruled out. Reliance on alternate feeding would require knowledge of why this area is so important and consideration in the first instance of seasonal restrictions to works for important passage periods for the species of concern. This also applies to the passage features of the SPA and Ramsar site.		<ul style="list-style-type: none"> See RI_H4 above 	No change. RI_H3 is also applicable here.		See RI_H3 above.
RI_H35	Natural England do not agree with the logic and discussion on foraging ranges as tracking data from the Ribble doesn't					

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	consider spatial displacement by Bowland (which currently supports many of the Ribble birds). Natural England agree that on this occasion there is no LSE.					
RI_H36	Natural England note that Preston Docks birds are assumed to be the displaced SPA colony, therefore it would be helpful to assess risk in the context of observed birds and this population.					
RI_H37	Natural England do not agree with the conclusions and advise the Applicant to consider the recommendations made above regarding conclusions made for wintering and passage birds and temporary habitat loss/disturbance at landfall (H41/H42).		<ul style="list-style-type: none"> See response to RI_H3 above 	No change. RI_H3 is also applicable here.		See response to RI-H3 above.
RI_H38	Further evidence is required to support the statement that trenchless techniques will avoid habitat loss at the Ribble crossing. Additional information on habitat loss from trenchless techniques, i.e. installation of equipment, onshore infrastructure at trench entry and exit pits needs to be considered and appropriately screened.		The Applicants welcome this response.			
RI_H39	Shelduck numbers are clearly high in the area. More information on the habitats being used may shed light on the required mitigation requirements. Natural England advise the Applicant to include shelduck into the calculations for the mitigation areas currently for pink footed goose and whooper swan and consider in more detail what function the habitats being made unavailable provided for the species. However, the Applicant should also consider the density of birds potentially using the mitigation areas and what risks there may be e.g. disease.		The Applicants found no evidence supporting the use of supplementary feeding with grain and root crops for non-breeding shelduck. Therefore, supplementary feeding will not benefit the non-breeding shelduck SPA feature. Non-breeding shelduck feed almost exclusively on marine gastropods. Given their reliance on intertidal habitats for foraging, the impact of construction activities in terrestrial habitats is predicted to be negligible; consequently, mitigation is not considered necessary.	No change.		Following a meeting with Natural England on 16 th September the Applicants have updated Appendix B of the oEMP (J6 Outline Ecological Management Plan (J6/F05)) with further detail regarding those species for which FLL exists, including shelduck and aim to mitigate for shelduck in the wet muddy fields and scrapes at Lytham Moss.
RI_H40	Natural England agree that in the long term the conclusions are appropriate for wigeon, but this conclusion does not account for effects in the short-term. Natural England advises the Applicant to consider measures to reduce impacts to wigeon in the short-term, noting that spatial scheduling of the works may		The Applicants have determined that non-breeding wigeon do not rely on functionally linked terrestrial habitats across the cable corridor as most wigeon recorded during surveys were recorded within Newton Marsh SSSI and Natural England has now agreed that there are no impacts upon Newton Marsh SSSI. Consequently, no mitigation is required, as no impacts are anticipated. Wigeon were mainly recorded within the	No change.		Following a meeting with Natural England on 16 th September the Applicants and Natural England have agreed that FLL does not exist for wigeon.

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	reduce the requirements for this and other species. Please see advice above regarding shelduck.		Newton Marsh SSSI, which lies within the survey area but outside the cable corridor. It should be noted that Natural England has confirmed that there are no potential impacts on the Newton Marsh SSSI (AS-078). Further clarification will be provided in a Terrestrial Waterbirds technical note (S_D4_17) at Deadline 4. Please, see comments about shelduck above.			
RI_H41	Natural England advises the Applicant to consider measures to reduce impacts to teal in the short-term. Please see advice above regarding shelduck and wigeon above.		Further clarification on the suitability of the mitigation measures for teal at Newton-with-Scales and Lytham Moss are included in the revised Outline Ecological Management Plan (APP-212) at Deadline 4.	No change.		<p>The Applicants submitted the following documents at Deadline 4 and are currently awaiting a response from Natural England:</p> <ul style="list-style-type: none"> S_D4_17 Onshore Terrestrial Waterbird Note - Rev F01 (REP4-120) J6 Outline Ecological Management Plan (Clean) - Rev F04 (REP4-058) <p>The Applicants welcome Natural England's comments on these documents.</p> <p>In addition, following a meeting with Natural England on 16th September the Applicants have updated Appendix B of the oEMP (J6 Outline Ecological Management Plan (J6/F05)) with further detail regarding shelduck (as agreed with Natural England).</p>
RI_H42	Natural England note the commitment to improving nearby areas of habitat for waders such as golden plover. The Applicant should provide more information on the proposed habitat improvements to ensure the measures are appropriate.		Further details on the mitigation measures at Newton-with-Scales and Lytham Moss are included in the revised Outline Ecological Management Plan (APP-212) at Deadline 4.	No change. RI_H7 is also applicable here.		<p>The Applicants submitted the following documents at Deadline 4 and are currently awaiting a response from Natural England:</p> <ul style="list-style-type: none"> S_D4_17 Onshore Terrestrial Waterbird Note - Rev F01 (REP4-120) J6 Outline Ecological Management Plan (Clean) - Rev F04 (REP4-058) <p>Further details on the suitability of these areas are contained in sections 4 of REP4-120 and Appendix B of REP4-058. The Applicants welcome Natural England's comments on these documents.</p> <p>In addition, following a meeting with Natural England on 16th September the Applicants have updated Appendix B of the oEMP (J6 Outline Ecological Management Plan (J6/F05)) with further detail and in line with REP4-121 as agreed with Natural England.</p>
RI_H43	Natural England note that Jourdan et al. (2022) report/paper is repeatedly referenced, but not included in the reference list.					
RI_H44	Natural England do not agree with the conclusion for black-tailed godwit. The Applicant should reassess their assessment framework and consider the proportions of the passage and winter populations that could be affected.		Further clarification on the suitability of the mitigation measures for black-tailed godwit are included in the revised Outline Ecological Management Plan (APP-212) at Deadline 4	No change.		<p>The Applicants submitted the following documents at Deadline 4 and are currently awaiting a response from Natural England:</p> <ul style="list-style-type: none"> S_D4_17 Onshore Terrestrial Waterbird Note - Rev F01 (REP4-120)

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	If adverse effects could arise, mitigation habitat should be provided that will cater for the requirements of the species.					<ul style="list-style-type: none"> J6 Outline Ecological Management Plan (Clean) - Rev F04 (REP4-058). <p>Further details on the suitability of these areas for black-tailed godwit are contained in sections 4 of REP4-120 and Appendix B of REP4-058. The Applicants welcome Natural England's comments on these documents.</p> <p>In addition, following a meeting with Natural England on 16th September the Applicants have updated Appendix B of the oEMP (J6 Outline Ecological Management Plan (J6/F05)) with further detail regarding those species for which FLL exists, including black-tailed godwit (as agreed with Natural England).</p>
RI_H45	<p>Natural England do not agree with the conclusion of no AEOI for temporary loss of supporting habitats and/or resource availability for the features that utilise terrestrial habitats for the Ribble and Alt Estuaries SPA. The Appropriate Assessment should focus on the populations revealed by the surveys, rather than modelled information. Natural England advises the following additional evidence is also required:</p> <ul style="list-style-type: none"> •Details of the locations of the alternative supporting habitat qualifying species can use, including their distance from the proposal boundary and size. •Further details of how the applicant will ensure the recovery of the temporary habitat loss. This should include details of mechanisms that will be put in place to ensure the supporting habitat recovers, and predicted timescales. 		The Applicants note the conclusions of the assessment presented within the Habitats Regulations Assessment Stage 2, Information to Support an Appropriate Assessment Part Three –Special Protection Areas (SPA) and Ramsar Site assessments (APP-017) are based on the maximum peak number of birds (from site-specific surveys) combined with a habitat availability approach that considers the species' foraging ranges. This approach informs the proportion of potential suitable habitats within the SPA that are affected by the proposed work	No change. RI_H3 is also applicable here.		<p>The Applicants submitted the following documents at Deadline 4 and are currently awaiting a response from Natural England:</p> <ul style="list-style-type: none"> • S_D4_17 Onshore Terrestrial Waterbird Note - Rev F01 (REP4-120) • J6 Outline Ecological Management Plan (Clean) - Rev F04 (REP4-058) <p>The Applicants welcome Natural England's comments on these documents.</p> <p>The Applicants note that loss of habitats will largely impact intensively farmed areas which are generally of low ecological value. In addition to there being plenty of alternative intensively farmed arable and pasture in the vicinity, the Applicants have committed to feeding the impacted geese and swans, thereby controlling carrying capacity to ensure that it does not fall beyond pre-construction levels. The addition of temporary and permanent areas which suit waders such as black-tailed godwit and wildfowl such as teal will provide safe refuges for birds to loaf, roost and forage. The Applicants note that there will not be any temporary loss of sensitive terrestrial habitats such as those found within the SPA and SSSIs, and therefore consider that these temporary losses of largely intensive agricultural land should be taken in context.</p> <p>The Applicants note that, although they will endeavour to reinstate impacted farmland as soon as reasonably practicable, they do not have control over how this is farmed. Indeed, within any given year, land use (e.g., crop types, cropping schedules, fallow cycles, livestock intensity) can change based upon landowner wishes, the Applicants have no control over this.</p> <p>In addition, following a meeting with Natural England on 16th September the Applicants have updated Appendix B the oEMP (J6 Outline Ecological Management Plan (J6/F05)) with REP4-121 as agreed with Natural England.</p>

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RI_H46	The SPA non-breeding waterbird assemblage is a feature in its own right, therefore all the other species that contribute to it also have to be considered, in particular in this case in terms of numbers, as diversity and quality are more likely to be robust at a site scale. Natural England advise the Applicant to revisit the framing of [APP-017] and re-consider impacts/risks and compensation and mitigations options and planning for managing the risks.		At the meeting on 25th July with Natural England, the Applicants provided a list of species that were not individually assessed in the ISAA. While all non-named assemblage species recorded during the site-specific surveys were evaluated in the EIA, 25 of these species were excluded from the ISAA assessment. Due to their generally low numbers, wide distribution, and status as naturalised species, these species are considered to be of negligible or no impact from the proposed works, and no mitigation is required. This information has been submitted as part of the terrestrial waterbirds technical note submitted at Deadline 4 (S_D4_17).	No change. RI_H3 is also applicable here.		The Applicants submitted the following document at Deadline 4 and are currently awaiting a response from Natural England: <ul style="list-style-type: none"> S_D4_17 Onshore Terrestrial Waterbird Note - Rev F01 (REP4-120) The issue of the waterbird assemblage is assessed in section 3 of this. Within this, the Applicants demonstrate that, although non-named features were not specifically named in the ISAA, there are no additional impacts to an assemblage largely composed of non-breeding gulls and naturalised geese, and that the proposed mitigations are also suitable to house any non-named waders. The Applicants welcome Natural England's comments on this document.
RI_H47	Natural England note the following statement : "...all features have been assessed independently there is not predicted to be any additional impact .." and do not agree with this conclusion and methodology in relation to the breeding waterbird assemblage, but note the conclusion of no AEOI is likely to be correct in this instance.					
RI_H48	Natural England disagrees with the conclusions for Dunlin as a Ramsar site feature for the same reasons as identified for other intertidal waders.		The Applicants remain fully committed to addressing these matters and to working collaboratively with Natural England to reach a resolution. In support of this commitment, the Applicants met with Natural England on 25 July 2025 and are working closely with Natural England to address this issue and are currently in discussions about measures to reduce impacts at source.	No change.		See RI_H3 above.
RI_H49	Natural England disagrees with the conclusions for Black-tailed godwit as a Ramsar feature for the same reasons as identified for other terrestrial waders.		Further clarification on the suitability of the mitigation measures for black-tailed godwit is provided in the revised Outline Ecological Management Plan (OEMP) at Deadline 4.	No change.		See RI_H44 above.
RI_H50	The assessment of habitat loss during the operational phase is based on habitat loss in a different site (Liverpool Bay SPA). Natural England advises the Applicant to update the report and include the habitat loss during Operation & Maintenance in Ribble and Alt Estuaries SPA.					
RI_H51	Fairhaven Saltmarsh is identified as a mitigation area, however questions remain over its suitability. Natural England strongly advise the Applicant to produce some supplemental information clarifying why this proposal is considered likely to be effective,		The Applicants remain fully committed to addressing these matters and to working collaboratively with Natural England to reach a resolution. In support of this commitment, the Applicants met with Natural England on 25 July 2025 and are working closely with Natural England	Progressed but not resolved. RI_H3 is also applicable here.		See response to RI_H3 above.

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	clarifying the management required to support delivery, and justifying its energetic value to the species impacted.		to address this issue and are currently in discussions about measures to reduce impacts at source.			
RI_H52	The level of detail presented in the mitigation area summaries for intertidal mitigation and terrestrial mitigation is not sufficient to fulfil the expectations of the HRA with regards to certainty of outcome. Produce some supplemental information clarifying why this proposal is considered likely to be effective, clarifying management to support delivery, and justifying its energetic value to the species impacted.		<p>The Applicants remain fully committed to addressing these matters and to working collaboratively with Natural England to reach a resolution. In support of this commitment, the Applicants met with Natural England on 25 July 2025 and are working closely with Natural England to address this issue and are currently in discussions about measures to reduce impacts at source.</p> <p>Further details on the mitigation measures at Newton-with-Scales and Lytham Moss are provided in the revised Outline Ecological Management Plan (OEMP) at Deadline 4.</p>	Progressed but not resolved. RI_H7 is also applicable here.		<p>The Applicants submitted the following documents at Deadline 4 and are currently awaiting a response from Natural England:</p> <ul style="list-style-type: none"> S_D4_17 Onshore Terrestrial Waterbird Note - Rev F01 (REP4-120) J6 Outline Ecological Management Plan (Clean) - Rev F04 (REP4-058) S_D4_18 Passage Period at Landfall Technical Note - Rev F01 (REP4-121) S_D4_9.1 Annex 9.1 Clarification note on the current position with Natural England (regarding Adverse Effect on Integrity) and the Fairhaven saltmarsh mitigation area - Rev F01 (REP4-109) <p>The Applicants have now agreed that there will be No AEol with Natural England for the intertidal features of the SPA (see RI_H3) and have updated Appendix B of the oEMP (J6 Outline Ecological Management Plan (J6/F05)) at D5 with the further detail requested by Natural England on the 16th September for the terrestrial features.</p>
RI_H53	Please note that comments relating to SSSI sites are included in the sections above.					

3.11 Risk and Issues Log – Fylde MCZ

Table 3-11: Responses to questions regarding the Fylde MCZ

ID	Risk and Issue Log comment	RAG Status Rel and WR Rep and D1	Applicants' comment at Deadline 4 (in response to NE D3 submission)	Natural England's Comments/Update on Progression at Deadline 4	RAG D4	Applicants' comment at Deadline 5 (in response to NE D4 submission)
Risk and Issues Log Deadline 1 – Fylde MCZ Taken from Natural England's Relevant and Written Representations Morgan and Morecambe Transmission Assets Appendix I - Fylde MCZ						
RI_I1	Up to 3% of the offshore export cables, including cable crossings within Fylde MCZ may require cable protection and this equates to a total of 0.0304km ² (30,400m ² /3.04ha) of lasting habitat change/loss within the site. Natural England does not agree with the Applicants conclusion of no likelihood of hindering the conservation objectives of Fylde MCZ. Unless it can be demonstrated otherwise, the nature, scale and duration of impacts from lasting habitats change/loss from the placement of cable protection is likely to hinder the 'maintain' habitat feature conservation objectives of the site. We advise that the MCZ assessment should proceed to a stage 2 assessment and a without prejudice Measures of Equivalent Environmental Benefit (MEEB) proposal should be produced.		The Applicants note that RI_I1 was resolved at Deadline 2.			
RI_I2	Natural England agrees with the MMO in considering that in order to fully discharge regulatory duties under section 69 (1) of the MCAA, in combination and cumulative effects must be considered. Natural England considers the O&M phase activities for Morgan and Morecambe Transmission Assets combined with the projects listed in Table 1.21 and on-going Oil and Gas impacts will result in lasting habitat change / physical disturbance which will further hinder the conservation objectives of the Fylde MCZ. We strongly advise that Applicant's potentially affecting the MCZ will need to intensify their use of the mitigation hierarchy.		<p>The Applicants' position remains as outlined in the Applicants' response to RR-1601.45 (PDA-014). In accordance with the Overarching National Policy Statement for Energy (EN-1), the MDS for cable protection has been designed in line with the mitigation hierarchy. Under the mitigation hierarchy developers must seek to avoid, reduce and mitigate environmental impacts before considering compensation.</p> <p>Consideration for routing of the offshore export cables in and around designated sites is provided in Section 4.3.2 of Volume 1, Annex 4.2: Selection and refinement of Offshore Infrastructure (APP-032) with the selected route through the Fylde MCZ considered in paragraphs 4.3.2.3 – 4.3.2.6 and 4.4.2.7. As the offshore export cable route passes through the Fylde MCZ, the Applicants reduced the environmental impact from cable protection in line with the mitigation hierarchy as detailed in Table 1.13 within the MCZ Screening and Stage 1 Assessment Report (APP-019) but cannot reduce</p>	No change.		The Applicants' position remains as outlined in the Applicants' response to RR-1601.45 (PDA-014). In accordance with the Overarching National Policy Statement for Energy (EN-1), the MDS for cable protection has been designed in line with the mitigation hierarchy.

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			<p>this further in the absence of more detailed vibrocore / CTP data:</p> <ul style="list-style-type: none"> • Cable protection for ground conditions within the Fylde MCZ was reduced (from up to 20% at PEIR for the Morgan Offshore Wind Project: Transmission Assets to 3%, from up to 15% at PEIR for the Morecambe Offshore Windfarm: Transmission Assets to 3% for use as a contingency only). Also, noting the Applicants commitment (CoT54 of Volume 1, Annex 5.3: Commitments Register of the ES (AS-030)) for cable burial as the preferred option of cable protection and minimum target burial depth of 0.5 m or greater, where possible, being acceptable within the Fylde MCZ to minimise need for external cable protection as detailed in section 3.1.1.7 of the Outline Offshore Cable Specification and Installation Plan (APP-220); and • ; • The offshore export cable route has been designed to minimise the number of crossings with existing cables, and therefore long term habitat loss resulting from cable protection requirements, within the Fylde MCZ. The Applicants have made all possible endeavours to move the cable crossings outside the Fylde MCZ however are restricted by existing infrastructure and engineering constraints (e.g. the need to cross the cable at a 90 degree angle). As such, whilst it was possible to move the Morecambe offshore export cable crossings westward beyond the boundary of the MCZ, the Morgan offshore export cables must cross the Lanis 1 cable within the Fylde MCZ. Therefore the Applicants have sought to reduce the parameters of the crossing, such as length and height, to minimise its impact. • The total potential long term habitat loss from cable protection within the Fylde MCZ was reduced from 0.16 km² (0.06% of the Fylde MCZ) at PEIR to 0.03 km² (0.012% of the Fylde MCZ). <p>As set out under paragraph 3.1.1.12 of the Outline CSIP (REP2-022) ground conditions within the Fylde MCZ are largely sand and clay with some areas of slightly gravelly seabed. Whilst slightly gravelly clay or slightly gravelly sand sediments are currently not anticipated to hinder cable burial via the trenching techniques under consideration, more dense areas of gravel, if present, could present a risk of reduced burial, leading to the need for cable protection. Based on the initial survey results from four vibrocores / cone penetration tests (CPTs), the</p>			

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			<p>use of additional cable protection for ground conditions within the Fylde MCZ is not envisaged. However, due to the limited survey data used to extrapolate seabed conditions across the MCZ, isolated disparate ground conditions could still be present. As such, the MDS allows for 3% cable protection for ground conditions within the Fylde MCZ as a contingency only (CoT47 in the Commitments Register, REP3-013) should later surveys indicate discrete areas of harder seabed where cable burial to the target depth cannot be reached.</p> <p>For the Applicants to not include the 3% contingency would risk a delay to completion of construction to engage on a variation to the deemed marine licence(s) and thus, a potential delay to completing the project and commencing contribution to UK Government targets for renewable energy..</p> <p>The MCZ Screening and Stage 1 Assessment Report (APP-019) concluded that cable protection for the Transmission Assets would not affect the conservation objectives of the Fylde MCZ. In regards to the effects upon the Fylde MCZ and the request to provide Without Prejudice Measures of Equivalent Ecological Benefit (MEEB), the Applicants maintain that a Stage 2 MCZ Assessment and MEEB are not required. The Applicants however provided a Stage 2 MCZ Assessment, including a without prejudice, in-principle Measures of Equivalent Environmental Benefit (MEEB) Plan, at Deadline 1 (REP1-059). Additionally, the Applicants have also provided a without prejudice benthic compensation schedule at Deadline 3 (REP3-066) should the Secretary of State deem it required.</p>			
RI_I3	The most recent condition assessment for Fylde MCZ concluded that subtidal sand and subtidal mud were in a favourable condition. Natural England advises that whilst the cable protection is in situ, the extent and distribution attribute of the site features can neither be maintained or restored. Nor can the impacts be considered temporary even if removal is secured at the end of the 35-year project lifespan. Therefore, we advise that the impacts will result in 'lasting' habitat change from mud and sand to hard substrata which may result in habitat loss as removal and/or recovery post removal is not guaranteed. Additionally, we do not agree with the		<p>Please see the Applicants' response to RI_B3. Response to further comments on the Applicants' In-principle MEEB proposal from 'Tab J Benthic Compensation' of the Risk and Issue Log and Appendix J of NE's Deadline 2 submission are provided in Error! Reference source not found. below, and Error! Reference source not found.</p>	No change.		The Applicants have updated Volume 2, Chapter 1: Physical Process (F2.1/F02) and the MCZ Screening and Stage 1 Assessment Report (E4/F02) at Deadline 5 to include information from the Outline Cable Burial Risk Assessment (APP-219) which indicates that from Lowest Astronomical Tide (LAT) to Depth of Closure (circa 10m CD) geological conditions are suitable for trenching to required depth.

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	Applicant that in-filling of cable protection with sediment will occur and be sufficient to provide the same structure and function in the impacted area. Unless the Applicant's position changes it is unlikely that there will be agreement between the Applicant and Natural England during examination on this issue. Please see comment I1 on the provision of a without prejudice MEEB case.					
RI_I4	<p>The Applicant has stated that the requirement for, and potential locations of any cable protection due to ground conditions within the Fylde MCZ are not yet known. Therefore, the MDS figures have assumed that the cable protection material for the cable crossing could occur wholly within either the subtidal sand or subtidal mud features. Therefore, the MDS for long term habitat loss of each of the features have been provided as: Subtidal sand – 0.0304km2 (0.014% of the area of this feature in the MCZ) Subtidal mud – 0.0304km2 (0.069% of the area of this feature in the MCZ)</p> <p>Natural England does not agree with this approach. We advise that an accurate MDS and realistic Worst-Case Scenario (WCS) for each feature is presented and assessed for lasting habitat change/loss and updated withing the Application documents. We highlight the importance in providing specific figures to inform the compensation requirements for a without prejudice MEEB.</p>		Please see the Applicant's response to NE5. Response to further comments on the Applicants' In-principle MEEB proposal from 'Tab J Benthic Compensation' of the Risk and Issue Log and Appendix J of NE's Deadline 3 submission are provided in Error! Reference source not found. below, and Error! Reference source not found.	No change. Please see Tab J for more detail.		<p>The Applicants' position remains as outlined in response to comment RR.1601.43 on the location and design of cable protection (PDA-014).</p> <p>The Applicants have updated the MCZ Screening and Stage 1 Assessment Report (E4/F02) at Deadline 5 to capture the relevant information/clarifications presented in the Applicants' response to Natural England's Deadline 3 submission (REP4-100) and all updated commitments.</p>
RI_I5	Natural England disagrees with the Applicant on the scale and significance of the impacts on the interest feature of the Fylde MCZ. Natural England also advises that impacts considered as a percentage of the whole MCZ is misleading given the size of the site. The lasting habitat change/loss impacts from the Transmission Assets combined are still 0.0304 km2/3.04ha from cable protection. We do not consider this amount of lasting habitat		Please see the Applicants' response to RI_I4.	No change.		The Applicants have updated the MCZ Screening and Stage 1 Assessment Report (E4/F02) at Deadline 5 to capture the relevant information/clarifications presented in the Applicants' response to Natural England's Deadline 3 submission (REP4-100) and all updated commitments.

ID	Risk and Issue Log comment	RAG Status Rel and WR Rep and D1	Applicants' comment at Deadline 4 (in response to NE D3 submission)	Natural England's Comments/Update on Progression at Deadline 4	RAG D4	Applicants' comment at Deadline 5 (in response to NE D4 submission)
	change/loss to be small scale. Natural England does not believe that the respective positions are likely to change in relation to scale and significance of the impact to the Fylde MCZ and therefore we provide no further comment unless design parameters change through the examination.					
RI_I6	Natural England note the commitments; CoT108 and CoT109 from the Applicant that any external cable protection used within the Fylde MCZ will be designed to be removable at decommissioning stage. However, we note that this commitment does not include the action to remove cable protection at the decommissioning phase, only that the protection will be 'removable'. Although some of the cable protection options included within the project description may be removable they are not considered as such from a nature conservation perspective due to further impacts to the designated site features e.g. rock armouring. We advise a commitment to remove all seabed infrastructure at the time of commissioning both inside and outside of Fylde MCZ should be secured in the DCO.		Please see the Applicants' response to RI_C5.	No change.		The Applicants have updated Volume 2, Chapter 2: Benthic subtidal and intertidal ecology (F2.2/F02) and the MCZ Screening and Stage 1 Assessment Report (E4/F02) at Deadline 5 to include reference to all new commitments made at previous deadlines.
RI_I7	Natural England reiterates concerns around the varying construction scenarios proposed by the Applicant. The most impactful to Fylde MCZ would be option 3b (i.e. sequential construction with a gap of up to a maximum of four years between completion of construction of the transmission assets for the first project and commencement of construction for the second project). This is mainly due to the four-year gap which may allow for some recovery of seabed habitats and species from the first works. The Applicant has not considered the potential for recovery and the impact from repeated interventions or the four-year gap, therefore we do not agree that the WCS has fully been assessed.		Please see the Applicant's response to NE3.	No change.		The Applicants have updated Volume 2, Chapter 2: Benthic subtidal and intertidal ecology (F2.2/F02) and the MCZ Screening and Stage 1 Assessment Report (E4/F02) at Deadline 5 to include all additional clarifications/justifications provided in submissions at previous deadlines to address Natural England's comments relating to the MDS.

ID	Risk and Issue Log comment	RAG Status Rel and WR Rep and D1	Applicants' comment at Deadline 4 (in response to NE D3 submission)	Natural England's Comments/Update on Progression at Deadline 4	RAG D4	Applicants' comment at Deadline 5 (in response to NE D4 submission)
RI_18	<p>Whilst we welcome the refinement work the Applicant has undertaken, we advise there are further mitigation options which should be explored by the Applicant to minimise impacts on Fylde MCZ and included for consideration in the Application, namely:</p> <ul style="list-style-type: none"> • Commitments should be made and secured to avoid the most sensitive Priority habitats designated under Section 41 of the NERC Act (2206). This is applicable both within and outside of Fylde MCZ; • Exclusion of the use of jack up vessels within the MCZ; • UXO clearance to be moved outside of the MCZ prior to detonation to avoid impacts to the seabed where possible; • Boulder clearance using a grab not a plough; • Remove all cable and scour protection at the time of decommissioning, both within and outside of Fylde MCZ • Further mitigation measures to be adopted with regards to sediment disposal (I10) • Refining long term habitat loss for subtidal mud and subtidal sand within Fylde MCZ to provide more realistic MDS parameters for habitat loss. 		<p>The Applicants thank Natural England for their comments on the welcomed refinements made by the Transmissions Assets to date. Please see the Applicants' response to RI-I2 on the application of the mitigation hierarchy within the Fylde MCZ. Additionally, Table 1.15 of the MCZ Screening and Stage 1 Assessment Report (APP-019) outlines how due consideration has been given to the mitigation measures put forward by Natural England in their Section 42 consultation response which have been recommended/adopted for other offshore wind farm projects to reduce impacts to designated sites.</p> <ul style="list-style-type: none"> • Please see the Applicants' response to comment NE6 regarding the Applicants' position on avoiding NERC priority habitats. • Please see response to RI_C19 and RI_C22 regarding the Applicants' position on jack-up vessels. • Please see response to RI_C19 regarding UXO clearance in the Fyle MCZ. • Please see response to RI_C13 regarding boulder clearance. • Please see response to RI_C5. around decommissioning of infrastructure. • Please see response to RI_C24 regarding sediment disposal. <p>Please see the Applicants' response to comment RI_I4 regarding the Applicants' position on the long term habitat loss MDS.</p>	No change.		<p>The Applicants have updated the MCZ Screening and Stage 1 Assessment Report (E4/F02) at Deadline 5 to include all additional clarifications/justifications provided in submissions at previous deadlines to address Natural England's comments and reference to all new commitments made at previous deadlines.</p>
RI_19	<p>Natural England would welcome further information on dredge and disposal activities with regards to Fylde MCZ. The Application states that disposal activities including sandwave clearance will be conducted throughout the Transmission Assets Order Limits but that no commitments have been proposed to mitigate impacts either within or outside of benthic designated sites. Mitigation options should be adopted and disposal options should be explored to ensure that sediment is deposited in areas of similar sediment character so that the risk of permanently altering the sediment character in any given location is minimised.</p>		<p>With regards to Natural England's comments relating to dredge and disposal activities in the Fylde MCZ please see the Applicants' response to RI_C24.</p>	No change.		<p>The Applicants have updated the MCZ Screening and Stage 1 Assessment Report (E4/F02) at Deadline 5 to remove reference to 'dredging' as a sandwave clearance method in the Fylde MCZ and to limit sandwave clearance methods in the Fylde MCZ to Controlled Flow Excavator. Additionally, the Applicants have updated the Outline Offshore Cable Specification and Installation Plan (J15/F03) at Deadline 5 to limit sandwave clearance methods in the Fylde MCZ to Controlled Flow Excavator.</p>
RI_110	<p>Natural England notes that secondary scouring needs further consideration in</p>		<p>Please see the Applicants' response to NE5 for information on the cable protection location and</p>	No change.		<p>The Applicants have updated the MCZ Screening and Stage 1 Assessment Report (E4/F02) at Deadline 5 to include the</p>

ID	Risk and Issue Log comment	RAG Status Rel and WR Rep and D1	Applicants' comment at Deadline 4 (in response to NE D3 submission)	Natural England's Comments/Update on Progression at Deadline 4	RAG D4	Applicants' comment at Deadline 5 (in response to NE D4 submission)
	the Stage I MCZ Assessment in relation to impacts to sediment transportation.		<p>design. As outlined previously in the Applicants' response to RR-1601.I.10 (PDA-024), where cable protection measures are required, they will be subject to engineering design to ensure they minimise as much as practical the occurrence of scour which is required in order to provide effective asset security. The exact parameters will be site specific and related to both cable protection type and seabed and hydrographic conditions. Therefore, any residual/secondary scour would be very localised and of negligible magnitude; typically confined to within a few metres of the direct footprint of the scour protection material. Cable protection measures will be tailored to the specific location, noting that installation below the bed level within the cable trench and adjacent seabed sediments may be undertaken to ensure compliance with the commitment to limit change in water depth to 5% (unless otherwise approved by Licensing Authority in consultation with the Maritime Coastguard Agency), (APP-037), CoT45. The Applicants can confirm that the height of the cable protection above the seabed may be altered in relation to the given water depth to adhere to this commitment, ensuring that any cable protection is sufficiently low in profile to cause minimal changes to wave, tide and sediment transport. Secondary scour impacts on features of the Fylde MCZ is assessed in section 1.8.8 of the MCZ Screening and Stage 1 Assessment Report (APP-019) which concludes that any effects would be confined to within a few meters of the direct footprint of that cable protection material.</p> <p>The Applicants also confirm that the MCZ Screening and Stage 1 Assessment Report (APP-019) will be updated and submitted at Deadline 5 to include the update to the MDS for the subtidal mud feature and all relevant new commitments for the Fylde MCZ.</p>			update to the MDS for the subtidal mud feature and all relevant new commitments for the Fylde MCZ.
RI_111	<p>Natural England notes that UXO clearance activities are likely to be undertaken within the Fylde MCZ. Natural England continues to advise that UXOs should be detonated outside of Fylde MCZ to avoid the creation of a crater.</p> <p>As a minimum, we advise that further information is required in relation to the depth of any crater and the impacts this may have on the subtidal mud and sand features including any recovery times.</p>		Please see the Applicants' response to RI_C19.	No change.		The Applicants have updated Volume 2, Chapter 1: Physical processes F2.1/F02), Volume 2, Chapter 2: Benthic subtidal and intertidal ecology (F2.2/F02) and the MCZ Screening and Stage 1 Assessment Report (E4/F02) at Deadline 5 to include all additional clarifications / justifications provided in submissions at previous deadlines to address Natural England's comments.

ID	Risk and Issue Log comment	RAG Status Rel and WR Rep and D1	Applicants' comment at Deadline 4 (in response to NE D3 submission)	Natural England's Comments/Update on Progression at Deadline 4	RAG D4	Applicants' comment at Deadline 5 (in response to NE D4 submission)
RI_112	We welcome the inclusion of in principal monitoring proposed for benthic subtidal and intertidal ecology in the Offshore In Principle Monitoring Plan (OIPMP). However, the focus seems to be on physical/sediment recovery and lacks sufficient ecological context. Additionally, there is no reference to pre- and post-construction monitoring which is essential to understand and assess recovery. We advise that the rationale within Table 1.3 of the OIPMP needs to be updated to additionally include "temporal and spatial changes in benthic communities and their recoverability....". We also advise that the Applicant provides clarity that monitoring surveys will be undertaken pre- and post-construction and that temporal monitoring over an agreed time period should take place in order to confirm recovery.		<p>Please see the Applicants' response to RI_C27. The Applicants have updated the Offshore In Principle Monitoring Plan (IPMP) submitted at Deadline 4 (J20/F02) to also include a commitment to specific monitoring of the temporal and spatial recovery of benthic communities in the Fylde MCZ through pre and post construction benthic community sampling and of the potential colonisation by Invasive Non-Native Species (INNS) following construction activities within the Fylde MCZ.</p> <p>The Applicants will update the MCZ Screening and Stage 1 Assessment Report (APP-019) for submission at Deadline 5 to include all additional commitments relevant to the MCZ.</p>	No change. We note that in a meeting held with the Applicant on 22/07/25 they outlined a new commitment to be submitted at Deadline 4 to commit to benthic community recovery specific monitoring pre and post construction. We would welcome the inclusion of this commitment and highlighted the need to include 'temporal and spatial' into the commitment as advised at Relevant Representations.		<p>The Applicants would highlight that the Offshore In Principle Monitoring Plan (OIPMP) was updated at Deadline 4 (REP4-075), to include a new commitment to benthic community recovery specific monitoring in the Fylde MCZ through both pre-construction and post- construction benthic community sampling to monitor for temporal and spatial recovery and of the potential colonisation by Invasive Non-Native Species (INNS) following construction activities within the Fylde MCZ.</p> <p>The Applicants have updated Volume 2, Chapter 2: Benthic subtidal and intertidal ecology (F2.2/F02) and the MCZ Screening and Stage 1 Assessment Report (E4/F02) at Deadline 5 to include the updated monitoring commitment outlined in the Offshore In Principle Monitoring Plan that was submitted at Deadline 4 (REP4-075).</p>
RI_113	Natural England notes that within the Outline O&M plan there is the intention to use the cable protection allowance over the lifetime of the project. However, this is not aligned with Natural England position on cable protection. We advise that post construction and an agreed snagging time a new marine licence would be required for the placement of further cable protection within Fylde MCZ. Natural England advises that the Applicant refines the O&M requirements to be align with the SNCB and regulatory position on this.		Please see the Applicants' response to RI_C2.	No change.		The Applicants have updated Volume 2, Chapter 2: Benthic subtidal and intertidal ecology (F2.2/F02) and the MCZ Screening and Stage 1 Assessment Report (E4/F02) at Deadline 5 to include reference to all new commitments made at previous deadlines.

3.12 Risk and Issue Log – Benthic Compensation

Table 3-12: Responses to questions regarding Benthic Compensation

ID / Appendix J reference	Risk and Issue Log comment	RAG Deadline 2	Applicants' comment at Deadline 4 (in response to NE D3 submission)	Natural England's Comments/Update on Progression at Deadline 4	RAG D4	Applicants' comment at Deadline 5 (in response to NE D4 submission)
Risk and Issues Log Deadline 1 – Benthic Compensation Taken from Natural England's Relevant and Written Representations Morgan and Morecambe Transmission Assets Appendix J - Benthic Compensation						
Compensation measure: Strategic Compensation - New site designation or Extension for Subtidal Sand and Subtidal Mud						
RI_J1 / J3	NE does not agree with the approach taken to determine the total WCS for lasting habitat loss. The approach taken assumes that cable protection requirements could occur wholly within either the subtidal sand or subtidal mud feature. In order for us to agree the impact, the habitat loss for each feature should be calculated then summed to provide the total area of habitat loss.		<p>Please see the Applicants' response to RI_I4. The Applicants' provided a Stage 2 MCZ Assessment, including a without prejudice, in-principle Measures of Equivalent Environmental Benefit (MEEB) Plan, at Deadline 1 (REP1-059) which updated the maximum design scenario (MDS) for long term habitat loss of each of the features to account for the cable crossing occurring only within the subtidal mud feature. As set out in the Outline Offshore Cable Specification and Installation Plan (CSIP) (REP2-022) as part of the detailed design process pre-construction survey data will be used to inform the final routing of the cables, any micro-siting requirements and areas where there is a higher risk of remedial works such as external cable protection. At this stage in the consenting process, however, the Applicants are unable to refine the assumptions further with respect to where cable protection for ground conditions will be required in the Fylde MCZ (if any is required at all).</p> <p>The Applicants will update the MCZ Screening and Stage 1 Assessment Report (APP-019) to include the updated MDS for long term habitat loss of each of the features to account for the cable crossing occurring only within the subtidal mud feature for submission at Deadline 5.</p>	No change.		The Applicants have updated the MCZ Screening and Stage 1 Assessment Report (E4/F02) at Deadline 5 to include the update to the MDS for the subtidal mud feature and all relevant new commitments for the Fylde MCZ.
RI_J2 / J4	Due to potential uncertainties with the delivery mechanisms and timeframes for successful delivery of the measure, further discussions are required in relation to individual project contributions and compensatory ratios which may be required.		<p>The Applicants welcome this response and have engaged in post-application/pre-examination consultation with Natural England regarding the MEEB for the Fylde MCZ and would welcome further discussions with Natural England and Defra, as the future Marine Recovery Fund (MRF) operator, in relation to individual project contributions and compensatory ratios which may be required for the Transmission Assets.</p> <p>Natural England's guidance regarding the delivery of MEEB, as outlined in their comments on the Applicants' response to Natural England's Relevant/Written Representations REP2-062), were taken in to account by the Applicants in the development of the Stage 2 MCZ Assessment (REP1-059). As outlined in the Stage</p>	<p>No change. Natural England notes that in a meeting held 22/07/25, the Applicant informed NE of a new commitment which will be submitted at Deadline 4. This will include a commitment that the Marine Recovery Fund is the preferred and prioritised option. We welcome this addition in the commitment and will provide advice as required in Examination.</p> <p>Advice on [REP3-066] Without prejudice benthic compensation schedule can be found in Appendix J4 submitted at D4.</p>		The Applicants have updated the MCZ Screening and Stage 1 Assessment Report (E4/F02) and Stage 2 MCZ Assessment, including a without prejudice, in-principle Measures of Equivalent Environmental Benefit (MEEB) Plan (S_D1_9/F02) at Deadline 5 to include all relevant new commitments for the Fylde MCZ.

ID / Appendix J reference	Risk and Issue Log comment	RAG Deadline 2	Applicants' comment at Deadline 4 (in response to NE D3 submission)	Natural England's Comments/Update on Progression at Deadline 4	RAG D4	Applicants' comment at Deadline 5 (in response to NE D4 submission)
			<p>2 MCZ Assessment (REP1-059), the Applicants and Natural England are in agreement that strategic compensation measures, in the form of a payment into the MRF to access Defra's programme of MPA designations/extensions, will be the preferred and best method for the delivery of MEEB for the Fylde MCZ (should MEEB be required). Regarding individual project contribution and compensatory ratios, as outlined in Section A.1.7.3 of the Stage 2 MCZ Assessment (REP1-059), the Applicants understand the ratio of MEEB to impact will be determined by Defra in consultation with SNCBs and will be used to determine the size of the monetary contribution made by the Applicants.</p> <p>The Applicants have submitted the document Without Prejudice Benthic Compensation DCO Schedule at Deadline 3 (REP3-066) that could be included in the DCO should it be concluded that benthic compensation was required. The drafting would secure the relevant measures set out in the Stage 2 MCZ Assessment (REP1-059). The Applicants had regard to the wording provided by Natural England when drafting the without prejudice schedule.</p> <p>The Applicants have also updated the Commitments Register at Deadline 4 (see CoT136, F1.5.3/F05), to include a clear commitment that, should benthic compensation be required, the Marine Recovery Fund (MRF) will be the preferred and prioritised option and the project-led options would only be considered where the MRF option is not made available to the Applicants. The Applicants will update Volume 2, Chapter 2: Benthic subtidal and intertidal ecology (APP-045) and the MCZ Screening and Stage 1 Assessment Report (APP-019) for submission at Deadline 5 to include reference to this new commitment.</p>			
RI_J3 / J5	Natural England recognises that there are likely to be time lags between impact occurring and compensation achieving the desired outcomes. We would wish to see the project contribution to the measure to be such that it ensures an overall environmental net positive outcome for the impacted feature over the lifetime of the project.		The Applicants note that this issue was resolved at Deadline 2.			
RI_J4 / J6	The location of the measure is still under consideration by DEFRA, NE and JNCC and as yet nothing has been agreed and/or secured. There is likely to be consultation		The Applicants note that this issue was resolved at Deadline 2.			

ID / Appendix J reference	Risk and Issue Log comment	RAG Deadline 2	Applicants' comment at Deadline 4 (in response to NE D3 submission)	Natural England's Comments/Update on Progression at Deadline 4	RAG D4	Applicants' comment at Deadline 5 (in response to NE D4 submission)
	on potential locations during the examination.					
RI_J5 / J7	Long Term implementation is still under consideration by DEFRA, NE and JNCC and as yet nothing has been agreed and/or secured.		The Applicants note that this issue was resolved at Deadline 2.			
RI_J6 / J8	Success criteria/Ability to prove additionality is still under consideration by DEFRA, NE and JNCC and as yet nothing has been agreed and/or secured.		The Applicants note that this issue was resolved at Deadline 2.			
Compensation measure: Biogenic Reef - Native Oyster						
RI_J7 / J10	Natural England advises that reef creation/enhancement is not considered to provide comparable ecological function and is therefore not an appropriate measure for subtidal sand and subtidal mud systems within Fylde MCZ and provide no further comment on this as a potential measure.		<p>The Applicants note this comment and would highlight that, as outlined in the Stage 2 MCZ Assessment (REP1-059), should the Secretary of State determine that MEEB be required for the Transmission Assets, Natural England and the Applicants are in agreement that strategic compensation measures are likely to be the preferred and best method for the delivery of MEEB for the Fylde MCZ. The Applicants have updated the Commitments Register at Deadline 4 (F1.5.3/F05), to include a clear commitment that, should benthic compensation be required, the Marine Recovery Fund (MRF) will be the preferred and prioritised option and the project-led options would only be considered where the MRF option is not made available to the Applicants (see CoT136).</p> <p>In line with other projects currently going through examination (e.g. Five Estuaries Offshore Wind Farm and Outer Dowsing Offshore Wind (Generating Station)), the Applicants have, however, also explored a longlist of potential project-led MEEB options. As outlined in Section A.1.7.3 of the Stage 2 MCZ Assessment (REP1-059), whilst the Applicants acknowledge that native oyster bed creation would not provide like-for-like compensation for subtidal sand and subtidal mud, the Applicants have outlined their reasons for why they consider that native oyster beds could provide a comparable ecological function (e.g. as native oyster reefs are known to provide shelter and food for juvenile fish). The Applicants would note that project-led measures have not been fully defined/developed further on the basis of feedback provided by Natural England at the meeting on 12 February 2025 during which Natural England stated that they were not requesting a long list of project-led MEEB measures and neither would they comment on it. The Applicants note that Natural England have confirmed this position in their comments in RI_J6 / J8 and RI_J5 / J7 above.</p>	No change.		The Applicants maintain the position set out at Deadline 4 regarding the reasons for inclusion of the project-led options. The Applicants have updated the MCZ Screening and Stage 1 Assessment Report (E4/F02) and Stage 2 MCZ Assessment, including a without prejudice, in-principle Measures of Equivalent Environmental Benefit (MEEB) Plan (S_D1_9/F02) at Deadline 5 to include all relevant new commitments for the Fylde MCZ.
Compensation measure: Bivalve Seeding inside MCZ						

ID / Appendix J reference	Risk and Issue Log comment	RAG Deadline 2	Applicants' comment at Deadline 4 (in response to NE D3 submission)	Natural England's Comments/Update on Progression at Deadline 4	RAG D4	Applicants' comment at Deadline 5 (in response to NE D4 submission)
RI_J8 / J11	It remains unclear what additionally this measure would provide and therefore NE questions this as being compensation for lasting habitat loss/change to subtidal sand and subtidal mud. In addition, the seeding of bivalves is associated with biogenic reef communities on mixed sediment and not subtidal sand and subtidal mud.		<p>Please see the Applicants response to RI_J7 & J10 for the Applicants' position on strategic compensation measures as the preferred and best method for the delivery of MEEB for the Fylde MCZ. The Applicants have updated the Commitments Register at Deadline 4 (F1.5.3/F05), to include a clear commitment that, should benthic compensation be required, the Marine Recovery Fund (MRF) will be the preferred and prioritised option and the project-led options would only be considered where the MRF option is not made available to the Applicants (see CoT136).</p> <p>As outlined in Section A.1.7.3 of the Stage 2 MCZ Assessment (REP1-059), whilst the Applicants acknowledge that bivalve seeding within the Fylde MCZ would not provide like-for-like compensation for subtidal sand and subtidal mud, the Applicants have outlined their reasons for why they consider that bivalve seeding could provide a comparable ecological function (e.g. bivalves are key component of the community within the Fylde MCZ and a key food resource for juvenile fish and therefore improving their population numbers could potentially improve this function within the Fylde MCZ). As outlined in the Applicants' response to RI_J7 & J10, this measure has not been developed further at this stage following the advice from that Natural England that they do not believe there is merit in further progressing project-led compensation measures at this time.</p>	No change.		The Applicants maintain the position set out at Deadline 4 regarding the reasons for inclusion of the project-led options. The Applicants have updated the MCZ Screening and Stage 1 Assessment Report (E4/F02) and Stage 2 MCZ Assessment, including a without prejudice, in-principle Measures of Equivalent Environmental Benefit (MEEB) Plan (S_D1_9/F02) at Deadline 5 to include all relevant new commitments for the Fylde MCZ.
Compensation measure: Bivalve Seeding outside of designated sites						
RI_J9 / J12	Given the legislative changes that would be required, Natural England does not consider this option is viable within the Project's timeframe. If the Applicant wishes to pursue this there will need to be agreement from The Crown Estate for a seabed lease and management measures put into place.		The Applicants note Natural England's comments and would highlight their response to RI_J7 & J10 confirming the Applicants' position on strategic compensation measures as the preferred and best method for the delivery of MEEB for the Fylde MCZ. The Applicants have updated the Commitments Register at Deadline 4 (F1.5.3/F05), to include a clear commitment that, should benthic compensation be required, the Marine Recovery Fund (MRF) will be the preferred and prioritised option and the project-led options would only be considered where the MRF option is not made available to the Applicants (see CoT136).	No change.		The Applicants maintain the position set out at Deadline 4 regarding the reasons for inclusion of the project-led options. The Applicants have updated the MCZ Screening and Stage 1 Assessment Report (E4/F02) and Stage 2 MCZ Assessment, including a without prejudice, in-principle Measures of Equivalent Environmental Benefit (MEEB) Plan (S_D1_9/F02) at Deadline 5 to include all relevant new commitments for the Fylde MCZ.
RI_J10 / J13	Natural England does not agree with the approach taken to determine the total WCS for lasting habitat loss. The approach taken assumes that cable protection requirements could occur wholly within either the subtidal sand or subtidal mud feature.		Please see the Applicants response to RI_J1 & J3 above.	No change.		The Applicants have updated the MCZ Screening and Stage 1 Assessment Report (E4/F02) at Deadline 5 to include the update to the MDS for the subtidal mud feature and all relevant new commitments for the Fylde MCZ.

ID / Appendix J reference	Risk and Issue Log comment	RAG Deadline 2	Applicants' comment at Deadline 4 (in response to NE D3 submission)	Natural England's Comments/Update on Progression at Deadline 4	RAG D4	Applicants' comment at Deadline 5 (in response to NE D4 submission)
RI_J11 / J14	The scale/extent of the measure has not been presented in detail and/or agreed with Natural England, JNCC or DEFRA.		<p>The Applicants note Natural England's comments and would highlight their response to RI_J7 & J10 confirming the Applicants' position on strategic compensation measures as the preferred and best method for the delivery of MEEB for the Fylde MCZ. The Applicants have updated the Commitments Register at Deadline 4 (F1.5.3/F05), to include a clear commitment that, should benthic compensation be required, the Marine Recovery Fund (MRF) is the preferred and prioritised option and the project-led options would only be considered where the MRF option is not made available to the Applicants (see CoT136)..</p> <p>In line with other projects currently going through examination, the Applicants have, however, also explored a longlist of potential project-led MEEB options, as the details of the MRF are not yet finalised. The Applicants acknowledge that in the event that Natural England and the Applicants' position changes, and project-led measures must be pursued, the Applicants would be required to provide further detail on these measures.</p>	No change.		The Applicants have updated the MCZ Screening and Stage 1 Assessment Report (E4/F02) at Deadline 5 to include all relevant new commitments for the Fylde MCZ.
RI_J12 / J15	We do not believe that this measure will be available in the project timeframes.		Please see the Applicants' response to RI_J11 & J14 above.	No change.		Please see the Applicants' response to RI_J11 & J14 above.
RI_J13 / J16	The location of the measure has not been presented in detail and/or agreed with TCE, Natural England, JNCC or DEFRA.		Please see the Applicants' response to RI_J11 & J14 above.	No change.		Please see the Applicants' response to RI_J11 & J14 above.
RI_J14 / J17, J18	There is a requirement for changes in legislation for the delivery of this measure and therefore until that is secured, further long-term implementation and success criteria remains unknown.		Please see the Applicants' response to RI_J11 & J14 above.	No change.		Please see the Applicants' response to RI_J11 & J14 above.
RI_J15 / J19	We do not believe that is currently suitable as a sole or part measure at this time.		Please see the Applicants' response to RI_J11 & J14 above.	No change.		Please see the Applicants' response to RI_J11 & J14 above.
Compensation measure: Seagrass habitat creation/restoration						
RI_J16 / J20	<p>Natural England advises that seagrass restoration is a lower preference measure compared to those supporting the same ecological function of the habitat being compensated for.'</p> <p>Natural England also highlights</p>		The Applicants note that this issue was resolved at Deadline 2.			

ID / Appendix J reference	Risk and Issue Log comment	RAG Deadline 2	Applicants' comment at Deadline 4 (in response to NE D3 submission)	Natural England's Comments/Update on Progression at Deadline 4	RAG D4	Applicants' comment at Deadline 5 (in response to NE D4 submission)
	that seagrass is not a feature of subtidal mud and further advice on this measure should be read in this light.					
RI_J17 / J21	Natural England has significant concerns about the deliverability of seagrass restoration, even on a small scale as there have been no long term successes with seagrass restoration in the UK. Subtidal seagrass restoration should only be a minor part of a wider package in terms of the required compensation. It could be retained to supplement other measures, or potentially as an adaptive management response.		The Applicants note Natural England's comments and would highlight their response to RI_J7 & J10 confirming the Applicants' position on strategic compensation measures as the preferred and best method for the delivery of MEEB for the Fylde MCZ. The Applicants have updated the Commitments Register at Deadline 4 (F1.5.3/F05), to include a clear commitment that, should benthic compensation be required, the Marine Recovery Fund (MRF) will be the preferred and prioritised option and the project-led options would only be considered where the MRF option is not made available to the Applicants (see CoT136).	No change.		The Applicants maintain the position set out at Deadline 4 regarding the reasons for inclusion of the project-led options. The Applicants have updated the MCZ Screening and Stage 1 Assessment Report (E4/F02) at Deadline 5 to include all relevant new commitments for the Fylde MCZ.
RI_J18 / J22	NE does not agree with the approach taken to determine the total WCS for lasting habitat loss. The approach taken assumes that cable protection requirements could occur wholly within either the subtidal sand or subtidal mud feature. In order for us to agree the impact, the habitat loss for each feature should be calculated then summed to provide the total area of habitat loss.		The Applicants note Natural England's comments and would highlight their response to RI_J7 & J10 confirming the Applicants' position on strategic compensation measures as the preferred and best method for the delivery of MEEB for the Fylde MCZ. The Applicants have updated the Commitments Register at Deadline 4 (F1.5.3/F05), to include a clear commitment that, should benthic compensation be required, the Marine Recovery Fund (MRF) will be the preferred and prioritised option and the project-led options would only be considered where the MRF option is not made available to the Applicants (see CoT136).	No change.		The Applicants have updated the MCZ Screening and Stage 1 Assessment Report (E4/F02) at Deadline 5 to include all relevant new commitments for the Fylde MCZ.
RI_J19 / J23	The scale/extent of the measure has not been presented in detail and/or agreed with the SNCBs.		The Applicants note that this issue was resolved at Deadline 2.			
RI_J20 / J24	It is unclear if this measure can be delivered prior to the impacts occurring.		The Applicants note that this issue was resolved at Deadline 2.			
RI_J21 / J25	The location of the measure has not been presented in detail and/or agreed with the SNCBs. More detail is required to address our concerns.		The Applicants note that this issue was resolved at Deadline 2.			
RI_J22 / J26, J27	Long term implementation and Success/Ability to prove additionality is yet to be considered in detail and agreed with the SNCBs. More detail is required to address our concerns.		The Applicants note that this issue was resolved at Deadline 2.			

ID / Appendix J reference	Risk and Issue Log comment	RAG Deadline 2	Applicants' comment at Deadline 4 (in response to NE D3 submission)	Natural England's Comments/Update on Progression at Deadline 4	RAG D4	Applicants' comment at Deadline 5 (in response to NE D4 submission)
RI_J23 / J28	Natural England advises that this measure could only be considered as part of a package providing <10% of the required compensation and/or potential adaptive management for part delivered compensation. There would also be a requirement for the provision of subtidal seagrass, not intertidal.		The Applicants note that this issue was resolved at Deadline 2.			
Detailed comments Documents used: [REP1-059] Stage 2 MCZ Assessment						
RI_J24 / J29	It is unclear why terrestrial issues have been included in the document. NE advises that there should be MEEB for each designated site.		The Applicants note that this issue has been categorised as yellow at Deadline 3 and so Natural England will not make further comment on the matter at subsequent deadlines, unless specifically requested to through ExA Questions.			
RI_J25 / J30	Natural England doesn't agree with the Applicant in relation to small scale losses not hindering the conservation objectives of the MCZ. We refer the ExA to Appendix C Annex A of our relevant/written representation [RR-1601]. It is unlikely that either Applicant's or Natural England position on this will change during examination.		The Applicants note that this issue was resolved at Deadline 2.			
RI_J26 / J32	Natural England advises that lasting habitat change/loss can only be considered if removed at the time of decommissioning. After that timeframe it becomes a permanent impact. We advise that commitments should be made to ensure removal.		Please see the Applicants' response to RI_C5.	No change.		The Applicants have updated Volume 2, Chapter 2: Benthic subtidal and intertidal ecology (F2.2/F02) and the MCZ Screening and Stage 1 Assessment Report (E4/F02) and Stage 2 MCZ Assessment, including a without prejudice, in-principle Measures of Equivalent Environmental Benefit (MEEB) Plan (S_D1_9/F02) at Deadline 5 to include reference to all new commitments made at previous deadlines.
RI_J27 / J33	Natural England advises that even where the conservation objectives are set to 'maintain', lasting habitats change/loss would not maintain the extent and distribution of the features; thus hindering them. This would lead to a restore conservation objective being set which can't be achieved whilst the cable protection is in situ, therefore we advise that MEEB is required.		Please see the Applicants' response to RI_I4.	No change.		The Applicants have updated the MCZ Screening and Stage 1 Assessment Report (E4/F02) and Stage 2 MCZ Assessment, including a without prejudice, in-principle Measures of Equivalent Environmental Benefit (MEEB) Plan (S_D1_9/F02) at Deadline 5 to capture the relevant information/clarifications presented in the Applicants' response to Natural England's Deadline 3 submission (REP4-100) and all updated commitments.
RI_J28 / J34	DESNZ guidance on the MRF agrees with the Applicant that		The Applicants note that this issue was resolved at Deadline 2.			

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	there is likely to be a time lag between impacts occurring and the delivery of the compensation. Therefore, allowances will be included in the MRF process for this.					
RI_J29 / J35	The EIA lifespan is 35 years. Therefore Natural England doesn't consider the impacts to be temporary, given that the features extent and distribution will be hindered. Likely leading to changes in other attributes. It is unlikely that either Applicant's or Natural England position on this will change during examination.		The Applicants note that this issue was resolved at Deadline 2.			
RI_J30 / J36	Natural England highlights those consents dating back to 2000 pre-date the MCZ designation and is therefore considered part of the baseline. We advise that the existing cable is not a material consideration in any decision making.		The Applicants note that this issue was resolved at Deadline 2.			
RI_J31 / J37	As written there is no differentiation between impacts to subtidal sand or subtidal mud except at the cable crossing which is known to be subtidal mud. We advise that unless the lasting habitat loss for the two features can be differentiated then it is likely that compensation will be required for 30,400m2 of subtidal mud, plus 26,400m2 of subtidal sand. We advise that this needs to be clearer.		Please see the Applicants' response to RI_J1 / J3.	No change.		The Applicants have updated the MCZ Screening and Stage 1 Assessment Report (E4/F02) and Stage 2 MCZ Assessment, including a without prejudice, in-principle Measures of Equivalent Environmental Benefit (MEEB) Plan (S_D1_9/F02) at Deadline 5 to include the update to the MDS for the subtidal mud feature and all relevant new commitments for the Fylde MCZ.
RI_J32 / J38	CoT 109: Natural England advises that it is not sufficient as mitigation. This mitigation measure should be considered further by the Applicant and removal of cable protection should be agreed now as part of a decommissioning plan.		Please see the Applicants' response to RI_C5. .	No change.		The Applicants have updated Volume 2, Chapter 2: Benthic subtidal and intertidal ecology (F2.2/F02) and the MCZ Screening and Stage 1 Assessment Report (E4/F02) and Stage 2 MCZ Assessment, including a without prejudice, in-principle Measures of Equivalent Environmental Benefit (MEEB) Plan (S_D1_9/F02) at Deadline 5 to include reference to all new commitments made at previous deadlines.
RI_J33 / J39	Natural England advises that the mitigation measure in CoT 116 is not sufficient in relation to sandwave levelling. Further commitments should be included such as the deposition of any		Please see the Applicants' response to RI_C24.	No change.		The Applicants have updated the following documents at Deadline 5 to remove reference to 'dredging' as a sandwave clearance method in the Fylde MCZ:

ID / Appendix J reference	Risk and Issue Log comment	RAG Deadline 2	Applicants' comment at Deadline 4 (in response to NE D3 submission)	Natural England's Comments/Update on Progression at Deadline 4	RAG D4	Applicants' comment at Deadline 5 (in response to NE D4 submission)
	sediment from sandwave levelling within the MCZ is placed adjacent to the levelling, in similar sediment and upstream of the sandwave to facilitate recovery.					<ul style="list-style-type: none"> • MCZ Screening and Stage 1 Assessment Report (E4/F02); • Outline Cable Specification and Installation Plan (CSIP) (J15/F03); • Volume 1, Chapter 1: Project Description (F1.3/F04); • Volume 2, Chapter 2: Benthic subtidal and intertidal ecology (F2.2/F02); • Volume 2, Chapter 1: Physical processes (F2.1/F02); • Dredging and disposal - site characterisation plan (J22/F02); and • Stage 2 MCZ Assessment, including a without prejudice, in-principle Measures of Equivalent Environmental Benefit (MEEB) Plan (S_D1_9/F02).
RI_J34 / J40	Natural England advises that the mitigation measure is CoT 117 is considered further by the Applicant. The use of Jack Up Vessels (JUVs) should be avoided in the MCZ due to potential leg depressions.		The Applicants have previously responded to the points raised by Natural England within RR-1601.C.25 of their response to Natural England – Appendix C (PDA-017). The Applicants have sought to limit the requirement for jack-up vessel deployments within the Fylde MCZ where feasible and have refined the MDS as a far as possible. The Applicants will continue to explore the alternatives to the use of jack-up vessels in the Fylde MCZ. The use of and locations of jack-ups will be further evaluated and considered post-consent in the detailed CSIP(s), following further post-consent and pre-construction surveys, secured as part of the detailed Construction Method Statement(s) (CMSs). The Applicants will update Volume 2, Chapter 2: Benthic subtidal and intertidal ecology (APP-045) and the MCZ Screening and Stage 1 Assessment Report (APP-019) for submission at Deadline 5 to include further justification to support the predicted infilling of depressions.	No change.		The Applicants have updated Volume 2, Chapter 2: Benthic subtidal and intertidal ecology (F2.2/F02) and the MCZ Screening and Stage 1 Assessment Report (E4/F02) and Stage 2 MCZ Assessment, including a without prejudice, in-principle Measures of Equivalent Environmental Benefit (MEEB) Plan (S_D1_9/F02) at Deadline 5 to include further justification to support the predicted infilling of depressions.
RI_J35 / J41	Natural England advises that we do not believe that there are further measures within the long list of measures that could be taken forward at the project level that would provide the necessary MEEB.		The Applicants note that this issue was resolved at Deadline 2.			

4 **References**

UK Parliament (2025) Written Statement UIN HCWS394. Available at <https://questions-statements.parliament.uk/written-statements/detail/2025-01-29/hcws394>, Accessed April 2025