



THE PLANNING ACT 2008

THE INFRASTRUCTURE PLANNING (EXAMINATION PROCEDURE) RULES  
2010

Morgan and Morecambe Offshore Wind Farm: Transmission Assets

**Appendix N7 to Natural England's Deadline 7 Submission**  
**Natural England's Answers to the Examining Authority's Request for Further**  
**Information Rule 17 Letter Deadline 7**

For:

The construction and operation of the Morgan and Morecambe Transmission Assets  
located approximately 0 - 37 km off the Northwest English Coast in the Irish Sea.

Planning Inspectorate Reference EN020028

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29 October 2025

**Natural England's answers to the Examining Authority's request for further information (issued 24 October 2025)**

Request	Natural England's response
<p><u>R17 2.1 – to Natural England</u></p> <p>The applicants, in their response to RIES Q14 [REP6-175], have outlined further alternative construction mitigation measures which they consider could be relied upon as an alternative to the proposed mitigation measures at Lytham Moss and Newton-with-Scales to ensure there would be no adverse effects on the integrity (AEIOI) of the Ribble and Alt Estuary Special Protection Area and Ramsar sites. These comprise further screening of construction works and seasonal working practices and have been included at Appendix H of the Outline Ecological Management Plan updated at deadline 6 [REP6-115].</p> <p>Natural England are asked to provide a view on the suggested measures, their feasibility and deliverability and whether the Secretary of State would be able to rely upon them to conclude no AEIOI? If not, why not?</p>	<p>Natural England advise that the current level of detail provided in Appendix H [REP6-115] regarding construction mitigation measures as alternatives to the proposed mitigation areas at Lytham Moss and Newton with Scales is not sufficient to rule out AEIOI of the Ribble and Alt Estuary SPA/Ramsar site. We acknowledge that the measures are relevant in-principle and if further developed and assessed could provide relevant mitigation; however given the absence of detail on either proposed measure, Natural England is unable to draw a meaningful opinion on their effectiveness or feasibility.</p> <p>We highlight that the alternative measures would need to be considerably more well-developed by the Applicant in order for Natural England to provide substantive advice. Further, any review of the alternative mitigation measures would need to be informed by a considerably greater level of detail regarding the likely phasing of construction works within the onshore corridor. The Applicant has been unable to provide such detail on phasing throughout the Examination. Detailed information would be needed, particularly in relation to specific locations, works and timings in which the phasing would occur to avoid sensitive periods for the SPA species.</p> <p>Therefore until further refinement on the proposed alternative construction mitigation is provided, we are unable to provide further comments.</p>
<p><u>R17.2.2 – to Natural England</u></p> <p>The applicant has made changes to the Information to Support Appropriate Assessment Part 3 paragraph 1.6.3.18 [REP6-023] regarding the impacts of permanent habitat loss on golden plover. Taking account of these changes do you agree with the applicants' conclusion of no AEIOI? If not, why not?</p>	<p>Whilst the survey data indicated irregular usage of the site by golden plover, the numbers present did exceed 1% of the SPA population which implies the area is actively selected by the species. Therefore, there is the potential that the area subject to permanent loss is preferential to golden plover. More generally, it should be recognised that monthly surveys are inevitably 'snapshots' of usage of areas by foraging waterbirds, which may be influenced by a range of factors including time of day, weather conditions, tidal cycle etc.</p>

<p>Do you consider that the mitigation area at Newton-with-Scales is required for no AEOL or if it constitutes a benefit for golden plover as described by the applicants. Explain your reasoning.</p>	<p>In the absence of the proposed measures at Newton-with-Scales we would not be able to rule out an AEOL for golden plover. However, with the updates made to the OEMP [REP6-115] for Newton-with-Scales (confirmation that surveys will be undertaken monthly over the duration of the project (30 years) to inform any adaptive management measures and a commitment to update the final EMP with the detail on the group who will carry out the monitoring/management)) Natural England agree that, based on the information presented in the Application at Deadline 6, AEOL can be ruled out for golden plover (and indeed other relevant SPA features).</p> <p>We continue to advise that both mitigation areas are required to address the temporary and permanent impacts on all relevant SPA waterbird features, including golden plover and the overall waterbird assemblage. Should the mitigation areas not be delivered as outlined in REP6-115, Natural England advise that we would need to be informed and appropriate alternative measures discussed and developed.</p>
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