

Date: 22 July 2026
Our ref: 552907
Your ref: EN020032



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BY EMAIL ONLY

Dear John Wheadon,

Planning Act 2008 and The Infrastructure Planning (Examination Procedure) Rules 2010

Application by Morgan Offshore Wind Limited, Morecambe Offshore Wind Limited ("the Applicant") for an Order granting Development Consent for the proposed Morgan and Morecambe Offshore Wind Farm Transmission Assets ("Project")

The following constitutes Natural England's formal statutory response to the Secretary of State's Request for Information (RFI) dated 08 July 2026. The information below is in response to questions outlined in Part 1 of the RFI. To inform this response Natural England have reviewed the following documents:

- C2-029.2 Applicants' Response to Secretary of State's Letter Dated 20 May 2026
- C2-029.16 J6 Outline Ecological Management Plan F08
- C2-029.23 Alternative Ornithology Mitigation Note – Permanent F02
- C1-029.29 Alternative Ornithology Mitigation Note - Temporary

Natural England has been invited to comment upon:

Onshore Ornithology and Bird Strike Risk to Aviation at Warton Aerodrome

9. Natural England is invited to review the Applicants' response [C2-029] and confirm its position on adverse effects on integrity (AEOL) outlined in [C2-025].

Natural England has reviewed the Applicant's submissions in response to the previous RFI, which provide additional information regarding permanent habitat loss at the proposed substation sites, including survey effort, the likelihood of the areas functioning as functionally linked land (FLL), and the availability of suitable alternative habitat.

Based on this additional information Natural England are now able to conclude that the permanent loss of habitat at the substation sites would **not** result in an adverse effect on integrity (AEOL). For

the avoidance of doubt, AEol can be ruled out without the need for permanent mitigation measures for impacts associated with permanent habitat loss.

In summary, the additional information provided in [C2-029.2] offers further evidence regarding the potential for FLL within the area of permanent habitat loss. Following review of the Applicant's response to Questions 10-13, Natural England is satisfied that the area does not represent high confidence FLL. While there may be some functional linkage, the surveys have been established as of sufficient standard to demonstrate that use of the area is sporadic, and bird numbers are relatively low. The Applicant's response demonstrates that surveys were undertaken across a range of tidal states and times of day, indicating that the area is not regularly used by golden plover at specific tidal states. Further, a robust rationale has now been provided to demonstrate that suitable alternative habitat is available in close proximity. Surrounding habitat is characterised by similar pasture and arable grassland habitat, which could accommodate golden plover displaced from the substation sites. Therefore, Natural England is now satisfied that suitable alternative habitat is available for loafing and foraging golden plover.

Update on Natural England's Position – Temporary Mitigation Scenarios

Natural England welcomes Point 10 of the RFI, which requests that the Applicant updates their outline Ecological Management Plan and all associated documents to retain Scenario 3, which utilises seasonal working and screening measures to avoid adverse effects. All scenarios were previously outlined in the document '*Alternative Ornithology Mitigation Note – Temporary*'. We note that the scenarios have been discussed and agreed with the Applicant, and we reiterate that Scenario 3 remains Natural England's preferred option. Should there be material changes to the temporary mitigation options, Natural England's position is likely to change.

To assist DESNZ in compiling their appropriate assessment, Table 1 below provides a final summary of the impact pathways identified and the mitigation (if required) to rule out AEol for the Ribble and Alt Estuaries SPA/Ramsar from Natural England's perspective. The mitigation measures included in the table have been consulted on and agreed to with the Applicant during the Examination phase.

Table 1 Impact Pathway, Receptor and Agreed Mitigation (if Required)

Impact pathway	Receptor	Mitigation measures	Is mitigation required to conclude No AEol?
Permanent loss of habitat at the substation sites	Non-breeding golden plover of the Ribble and Alt Estuaries SPA and	N/A	No

Impact pathway	Receptor	Mitigation measures	Is mitigation required to conclude No AEol?
	Ramsar site.		
Temporary disturbance and habitat loss – onshore cable corridor	Non-breeding waterbird features of the Ribble and Alt Estuaries SPA and Ramsar site.	Scenario 3 as presented in the Applicant's OEMP (ref: J6/F08) and 'Alternative Ornithology Mitigation Note - Temporary', which includes seasonal working and screening at Lytham Moss and Newton-with-Scales.	Yes
Temporary disturbance and habitat loss – landfall	Intertidal wader features of the Ribble and Alt Estuaries SPA and Ramsar site.	Construction mitigation measures at the landfall as presented in the Applicant's OEMP (ref: J6/F08). Seasonal restrictions at landfall on Lytham St Annes beach as presented in the Applicant's Commitment Register (ref: CoT129) and the OEMP (ref: J6/F08). Permanent mitigation area at Fairhaven saltmarsh to address residual impacts as presented in the Applicant's OEMP (ref: J6/F08).	Yes

Yours faithfully,

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