

Date: 26 November 2024  
Our ref: Case: 18251 Consultation: 480575  
Your ref: EN010121



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**BY EMAIL ONLY**

Dear Robert Jackson,

**Morecambe Offshore Windfarm Generation Assets**

The following constitutes Natural England's formal statutory response for Examination Deadline 1.

**1. Natural England's Deadline 1 Submissions**

Natural England has reviewed the documents submitted by the Applicant at Procedural Deadline A. We are submitting the following detailed responses:

- EN010121 Morecambe Generation NE Risk and Issues Log Deadline 1

**2. Risk and Issues Log and Engagement through Examination**

Natural England has submitted a Risk and Issues Log, which aims to track progress on the issues raised in our relevant/written representations. It is anticipated that the Risk and Issues Log will be updated and submitted alongside our submissions during examination at each deadline to reflect any progress in issue resolution during examination.

Natural England wishes to highlight that the focus of our engagement during Examination will be on reviewing relevant updated documents/outline plans submitted by the Applicant. We therefore request that the Applicant submits future updates in the form of tracked changes to the relevant documents and plans. Whilst the Applicant has provided updates on issues we have raised through their response to our Relevant Representations and through their submissions at Procedural Deadline A, these are yet to be reflected in updated documentation

and our RAG rating will therefore not be changed. Many of these issues are readily resolvable once updates have been made to the relevant plans and assessments.

Once a risk or issue has been categorised as yellow or 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 greyed out at subsequent deadlines in order to rationalise the Risk and Issues Log. For Deadline 1 only, some acknowledgements of minor changes made to address yellow-rated issues are present in the Risk and Issues Log.

We are unlikely to respond directly to further commentary on our representations (including on the Risk and Issues Log) from the Applicant or Interested Parties, unless there is significant new material included, a misinterpretation of Natural England's position, or if the Examining Authority (ExA) questions direct us to do so. The Risk and Issues Log will be used to track issue progress and we will signpost to our advice where applicable. Likewise, if the Applicant wishes to provide a signposting document that directs us and the ExA to where they address our concerns with tracked changes in the various plans, documents or /assessments then that would be welcomed.

Natural England's current concerns for Subtidal Benthic Ecology have a yellow RAG status or arise from risks and issues identified in our comments for Marine Geology, Physical Processes, Sediment and Water Quality. We will therefore not be providing any further advice or Risk and Issues Log updates for Subtidal Benthic Ecology, unless specifically requested through ExA questions.

Natural England's current concerns for Fish and Shellfish Ecology have now all been categorised as green or yellow RAG status. We will therefore not be providing any further advice or Risk and Issues Log updates for this topic, unless specifically requested through ExA questions.

Please note that due to resource constraints, unless there is a significant change to the project design or changes in the Applicant's position in relation to the points raised within our Relevant Representations, Natural England will no longer be providing full marine mammal advice for this Examination.

### **3. Statement of Commonality for Statements of Common Ground (SoCG), Principal Areas of Disagreement Summary Statements (PADSS) and other progress tracking documents**

At the request of the ExA, the Applicant has provided a Combined Examination Progress Tracker and Statement of Commonality (PD1-013). In this document, the Applicant notes Natural England's preference not to engage in Statements of Common Ground and that our updated Risk and Issues log and Principal Areas of Disagreement Summary Statement (PADSS) will be used instead. Natural England will provide an updated Risk and Issues Log at each Deadline (1-6), with which the "Summary" tab will track progress on the issues identified in our PADSS. This will include any relevant points regarding ongoing engagement with the Applicant.

The Applicant has included a table, "*Summary of Commonality with each stakeholder in relation to each topic covered at Procedural Deadline A*" in this document, in which they provide a RAG rating against each topic area for each stakeholder. We draw the ExA's attention to the fact that the RAG ratings used in this table are the Applicants overall assessment of whether there is agreement between the Applicant and the stakeholder for a given topic area, and are not reflective of Natural England's assessment of risk as indicated in our RAG ratings, for which our Risk and Issues log and PADSS must be consulted. **We**

**are not commenting on the agreement rating given to specific thematic areas at this stage, but we advise that because none of the topics are rated amber or red for Natural England, the table does not accurately represent the level of disagreement that still exists regarding key receptors.**

Natural England submitted a PADSS within our Relevant Representations cover letter and will submit an updated PADSS at Deadline 4. Unless the ExA requests otherwise, we will also submit an updated final PADSS at Deadline 6 rather than input to an Applicant-led final SoCG. We hope this will be of assistance to the ExA in rapidly identifying Natural England's outstanding issues and will demonstrate progress on issue resolution. We also hope that this will assist the Applicant in updating their Statement of Commonality and SoCGs at the relevant stages.

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

Yours sincerely,

Laurence Browning

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