



The Planning Inspectorate

Our IP ref: 20053904

By email:

Our ref. XA/2025/100238/02-L01

morganandmorecambeowfta@planninginspectorate.gov.uk

Your ref: EN020032

Date: 10 April 2025

Dear Sir / Madam

SUMMARY: PRE-EXAMINATION INTERESTED PARTY RELEVANT REPRESENTATION.

MORGAN AND MORECAMBE OFFSHORE WIND FARMS TRANSMISSION ASSETS

This is a summary of our Relevant Representations, providing an overview of the project issues which fall within our remit. They are given without prejudice to any further detailed representations we may make throughout the examination process.

Summary of the Environment Agency position

1. Ecology

When high voltage cables go under rivers there is potential for the electromagnetic field (EMF) generated to impact on fish behaviour. In the absence of conclusive evidence of no impact, we adopt the precautionary principle and require that appropriate measures are put in place by the developer, so that no detectable EMFs result from the installation of underground cables within the wetted area of an inland waterbody. This is in line with planning policy NPS EN3.

Whilst we support an increase in depth as mitigation, details on the reasoning behind the depth chosen should be provided, with evidence that magnetic fields at this depth will not be detectable from the cable within the wetted area.

If sufficient evidence cannot be presented, then it is likely that a requirement for monitoring of EMF levels where cables are laid under watercourses will be required.

It is noted that a number of ecological surveys are being carried out to inform the detailed Ecological Management Plan, as secured by requirement 12. We request that the Environment Agency is included as a consultee under requirement 12 and look

forward to reviewing these documents in order to advise the determining authority accordingly. These include:

- the detailed Biosecurity Plan
- the outstanding water vole surveys
- mitigation measures for otters
- Habitat creation and improvement proposals especially regarding Lea Marsh Fields and Dow Brook.

2. Flood Risk

The works will require detailed project design, and the Environment Agency requests early involvement in the development of these details. Please see Appendix 2 for suggested text for requirements regarding consultation on design details.

Following DCO approval, we request ongoing consultation with the EA regarding the construction of works. This should be secured through amendments to the Outline Communications Plan to provide regular joint meetings with relevant stakeholders

It is noted that the applicant intends to disapply FRAPS. We have yet to see the detail of this and thus we do not agree to the disapplication until further details are received and the relevant protective provisions are in place.

3. Geology, Hydrogeology and Ground conditions

To manage the risks associated with the instillation of the cables a Hydrogeological risk assessment is required for the installation of cables beneath the sand dunes, and for the River Ribble crossing. These must include risk assessment and clarification of the depths of the dewatering that will be required for entry/exit shafts. Please see Appendix 2 for suggested text for requirements.

To manage the risks to groundwater associated with deep piled foundations a Foundation Works Risk Assessment is required for any onshore piled structures including the substations. Please see Appendix 2 for suggested text for requirements.

4. Amended Requirements

We request that the wording of the following Requirements is amended to state that approval by the local planning authority is in consultation *with the Environment Agency*:

- Requirements 4 - Substation works;
- Requirement 6 - Provision of landscaping
- Requirement 12 - Ecological Management Plan

5. Timescales

Schedule 12 – Approval of matters specified in requirements

In order for the Environment Agency to advise determining authorities in the discharge of requirements we need sufficient time to review documentation.

Therefore, we require **21** days to review consultations on matters specified in requirements.

6. Protective Provisions

Schedule 10 Part 9: For the protection of the Environment Agency.

We have provided the applicant with our standard wording and expect to be able to agree this in due course. Please see further advice on this topic in Appendix 3.

7. Remaining detailed points which have not been addressed

Further detailed issues and comments which need to be resolved and/or noted by the developer have been identified in Appendix 1.

8. Work package tracker

The Environment Agency tracks its position through the planning process. Please see Appendix 4 to see this tracker.

9. Consents Strategy

It is recommended that a consents strategy is included which outlines what additional consents are required for this project. This is to ensure all parties (including the public) are aware of what is being address and under what consent. This is to increase transparency is the process.

Yours faithfully,



Planning Specialist – National Infrastructure Team

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