

Morgan and Morecambe Offshore Wind Farms: Transmission Assets

Security Classification: Project Internal



Planning Statement

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MORGAN AND MORECAMBE OFFSHORE WIND FARMS: TRANSMISSION ASSETS

Planning Statement

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Prepared by:	Prepared for:
RPS	Morgan Offshore Wind Limited, Morecambe Offshore Windfarm Ltd

Executive summary

- E.1.1.1 This Planning Statement has been prepared for the Morgan and Morecambe Offshore Wind Farms: Transmission Assets (referred to hereafter as the ‘Transmission Assets’). This document has been prepared on behalf of the Applicants, Morgan Offshore Wind Limited (Morgan OWL) and Morecambe Offshore Windfarm Ltd (Morecambe OWL) and accompanies an application for development consent under section 37 of the Planning Act 2008.
- E.1.1.2 The Transmission Assets are required to connect the Generation Assets (Morgan Offshore Wind Project and the Morecambe Offshore Windfarm) to the National Grid, which will consist of the following.
- Offshore: offshore export cables.
 - Landfall site.
 - Onshore: onshore export cables, onshore substations, 400 kV grid connection cables, environmental mitigation areas and biodiversity benefit areas.
- E.1.1.3 The offshore elements of the Transmission Assets are located in the east Irish Sea wholly within English offshore and inshore waters, whilst the onshore elements are located within the local authority areas of Fylde Council, Blackpool Council, South Ribble Borough Council, Preston City Council and Lancashire County Council.
- E.1.1.4 Delivery of the Transmission Assets would contribute promptly to:
- the UK Government’s ambition to deliver 50 GW of offshore wind by 2030;
 - delivering much needed investment and securing construction and operations jobs in the UK;
 - securing our energy supply; and
 - the UKs response to the climate change crisis.
- E.1.1.5 The Morgan and Morecambe offshore wind farms, together with the Transmission Assets, therefore have an important part to play in securing the timely delivery of the Government’s renewable energy strategy and achieving legally binding emissions reduction targets.
- E.1.1.6 The national and international policy commitments described in this Planning Statement demonstrate the need for renewable energy and, specifically, for offshore wind, in order to meet climate commitments and contribute to addressing the climate crisis. This need is confirmed within the National Policy Statements (NPSs).
- E.1.1.7 NPS EN-1 presents a compelling case for the need for new electricity generating capacity in order to meet the UK’s net zero target by 2050 and the urgent need for new electricity generating capacity to meet this objective. This need covers both offshore wind farms and the transmission infrastructure required to connect them to the UK electricity transmission network. Delivering that change is a major challenge, particularly within a

market-based system and with severe constraints on public expenditure in the short term. NPS EN-1 (paragraph 1.3.10) confirms that the NPSs are the principal policy in the determination of electricity infrastructure projects subject to a section 35 direction.

- E.1.1.8 Paragraphs 3.3.62 and 4.2.4 of NPS EN-1 confirm that the Government: *‘... has concluded that there is a critical national priority (CNP) for the provision of nationally significant low carbon infrastructure.’*
- E.1.1.9 The Transmission Assets are of the type considered to be CNP infrastructure in NPS EN-1 (being the transmission works for an essential part of low carbon energy projects and directed into the regime under section 35 of the Planning Act 2008). The Applicants therefore consider that the Transmission Assets benefit from the policy support provided to CNP infrastructure.
- E.1.1.10 The strengthened presumptions in favour of CNP infrastructure set out that *‘...in all but the most exceptional circumstances, it is unlikely that consent will be refused on the basis of these residual impacts.’*
- E.1.1.11 NPS EN-1 therefore confirms that the ‘Government strongly supports the delivery of CNP Infrastructure, and it should be progressed as quickly as possible’ (paragraph 3.3.63).
- E.1.1.12 NPS EN-3 states that the government expects offshore wind to play a significant role in decarbonising the energy system. It confirms that the government has set an ambitious target to have 50 GW of offshore wind capacity by 2030, with an expectation that there will be a need for substantially more installed offshore capacity beyond this to achieve net zero by 2050.
- E.1.1.13 NPS EN-5 sets out important considerations for electricity networks infrastructure, including consenting, siting and design considerations. Section 2.7 of EN-5 sets out the general assessment principles for transmission infrastructure in circumstances in which generating stations and their related infrastructure will be contained in separate applications (the example is given of a connection for multiple generation projects, as is the case for the Transmission Assets). This refers back to NPS EN-1. Paragraph 2.7.3 of NPS EN-5 recognises that there may be circumstances in which a single application contains works relating to multiple generation projects and that this will be acceptable where those works meet the need set out in EN-1. Section 2.13 confirms policy support for a coordinated approach. As identified through this Planning Statement, the Transmission Assets are recognised as transmission and energy infrastructure within the scope of NPS EN-5 and considered as nationally significant in their own right, but also as a key element required in connection with offshore wind generation and are therefore of the type considered to be CNP infrastructure in EN-1.
- E.1.1.14 This Planning Statement sets out the compliance of the Transmission Assets with national and local policy. It is shown that the application is consistent with the relevant NPSs, in accordance with section 104 ~~or section 105~~ of the Planning Act 2008. There is a presumption in favour of applications which accord with any relevant NPSs, in particular those projects for which a CNP has been established.

- E.1.1.15 Considering this, NPS EN-1 confirms that CNP infrastructure is to be treated as if it has met any tests which are set out within the NPSs, or any other planning policy, which requires a clear outweighing of harm, exceptionality or very special circumstances. This includes development within Green Belts, development affecting Sites of Special Scientific Interest (SSSIs), development in nationally designated landscapes and where there is substantial harm to or loss of significance to heritage assets.
- E.1.1.16 This Planning Statement outlines an assessment of the Transmission Assets against relevant NPSs, the National Planning Policy Framework (NPPF), marine policy and local planning authority policy considerations. This assessment demonstrates that the Transmission Assets accord with these policies.
- E.1.1.17 The construction, operation and maintenance and decommissioning of the Transmission Assets would be carried out in accordance with the relevant NPSs and other identified material planning policy matters. Where there are predicted impacts from the Transmission Assets, appropriate and proportionate mitigation measures are proposed.
- E.1.1.18 The need for the Transmission Assets and offshore wind is clearly supported by the NPSs, in addition to wider governmental obligations and objectives relating to low carbon electricity generation, climate change and the economy.
- E.1.1.19 In consideration of the matters set out in this Planning Statement, the Secretary of State can conclude that the application for the Transmission Assets:
- accords with the requirements of the Planning Act 2008;
 - contributes to meeting renewable energy targets and providing energy security;
 - assists in reducing carbon emissions;
 - is an application which should benefit from the policy support provided to CNP infrastructure, bringing significant benefits that would outweigh any adverse impacts; and
 - complies with the Environmental Impact Assessment and Habitats Regulations Assessment Regulations, national and local planning and marine policy.

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Glossary

Term	Meaning
400 kV grid connection cables	Cables that will connect the proposed onshore substations to the existing National Grid Penwortham substation.
400 kV grid connection cable corridor	The corridor within which the 400 kV grid connection cables will be located.
Applicants	Morgan Offshore Wind Limited (Morgan OWL) and Morecambe Offshore Windfarm Ltd (Morecambe OWL).
Baseline	The status of the environment without the Transmission Assets in place.
Biodiversity benefit	An approach to development that leaves biodiversity in a better state than before. Where a development has an impact on biodiversity, developers are encouraged to provide an increase in appropriate natural habitat and ecological features over and above that being affected. For the Transmission Assets, biodiversity benefit will be delivered within identified biodiversity benefit areas within the Onshore Order Limits. Further qualitative benefits to biodiversity are proposed via potential collaboration with stakeholders and local groups, contributing to existing plans and programmes, both within and outside the Order Limits.
Climate change	A change in global or regional climate patterns, in particular a change apparent from the mid to late 20th century onwards and attributed largely to the increased levels of atmospheric carbon dioxide produced by the use of fossil fuels.
Code of Construction Practice	A document detailing the overarching principles of construction, contractor protocols, construction-related environmental management measures, pollution prevention measures, the selection of appropriate construction techniques and monitoring processes.
Commitment	This term is used interchangeably with mitigation and enhancement measures. The purpose of commitments is to avoid, prevent, reduce or, if possible, offset significant adverse environmental effects. Primary and tertiary commitments are taken into account and embedded within the assessment set out in the ES.
Construction Traffic Management Plan	A document detailing the construction traffic routes for heavy goods vehicles and personnel travel, protocols for delivery of Abnormal Indivisible Loads to site, measures for road cleaning and sustainable site travel measures.
Contracts for Difference	Private contracts between a low carbon electricity generator and the UK Government owned Low Carbon Contracts Company.
Cumulative Effects	The combined effect of the Transmission Assets in combination with the effects from other proposed developments, on the same receptor or resource.
Design envelope	A description of the range of possible elements and parameters that make up the Transmission Assets options under consideration, as set out in detail in Volume 1, Chapter 3: Project Description. This envelope is used to define the Transmission Assets for EIA purposes when the exact engineering parameters are not yet known. This is also referred to as the Maximum Design Scenario or Rochdale Envelope approach.
Development Consent Order	An order made under the Planning Act 2008, as amended, granting development consent.

Term	Meaning
Environmental Impact Assessment	The process of identifying and assessing the significant effects likely to arise from a project. This requires consideration of the likely changes to the environment, where these arise as a consequence of a project, through comparison with the existing and projected future baseline conditions.
Environmental Statement	The document presenting the results of the Environmental Impact Assessment process.
Evidence Plan Process	A voluntary consultation process with specialist stakeholders to agree the approach to, and information to support, the EIA and Habitats Regulations Assessment processes for certain topics.
Generation Assets	The generation assets associated with the Morgan Offshore Wind Project and the Morecambe Offshore Windfarm include the offshore wind turbines, inter-array cables, offshore substation platforms and platform link (interconnector) cables to connect offshore substations.
Greenhouse gas	A gas that absorbs and emits radiant energy within the thermal infrared range, causing the greenhouse effect. Examples include carbon dioxide and methane.
Habitats Regulations	The Conservation of Habitats and Species Regulations 2017 (as amended) and the Conservation of Offshore Marine Habitats and Species Regulations 2017 (as amended).
Horizontal directional drilling	A trenchless technique for installing cables and cable ducts involving drilling in an arc between two points.
Inter-related Effects	Inter-related effects arise where an impact acts on a receptor repeatedly over time to produce a potential additive effect or where a number of separate impacts, such as noise and habitat loss, affect a single receptor.
Intertidal Infrastructure Area	The temporary and permanent areas between MLWS and MHWS.
Kyoto Protocol	The Kyoto Protocol is an international agreement linked to the United Nations Framework Convention on Climate Change, which commits its parties to reducing greenhouse gas emissions by setting internationally binding emission reduction targets, implemented primarily through national measures but also via wider market-based mechanism
Landfall	The area in which the offshore export cables make landfall (come on shore) and the transitional area between the offshore cabling and the onshore cabling. This term applies to the entire landfall area at Lytham St. Annes between Mean Low Water Springs and the transition joint bays inclusive of all construction works, including the offshore and onshore cable routes, intertidal working area and landfall compound(s).
Local Authority	A body empowered by law to exercise various statutory functions for a particular area of the United Kingdom. This includes County Councils, District Councils and County Borough Councils.
Local Planning Authority	The local government body (e.g., Borough Council, District Council, etc.) responsible for determining planning applications within a specific area.
Main rivers	The term used to describe a watercourse designated as a Main River under the Water Resources Act 1991 and shown on the Main River Map. These are usually larger rivers or streams and are managed by the Environment Agency.

Term	Meaning
Maximum design scenario	The realistic worst case scenario, selected on a topic-specific and impact specific basis, from a range of potential parameters for the Transmission Assets.
Mean High Water Springs	The height of mean high water during spring tides in a year.
Mean Low Water Springs	The height of mean low water during spring tides in a year.
Method Statements	A document that describes how a particular task or action should be undertaken correctly.
Mitigation measures	This term is used interchangeably with Commitments. The purpose of such measures is to avoid, prevent, reduce or, if possible, offset significant adverse environmental effects.
Morecambe Offshore Windfarm: Generation Assets	The offshore generation assets and associated activities for the Morecambe Offshore Windfarm.
Morecambe Offshore Windfarm: Transmission Assets	The offshore export cables, landfall, and onshore infrastructure required to connect the Morecambe Offshore Windfarm to the National Grid.
Morecambe OWL	Morecambe Offshore Windfarm Limited is a joint venture between Zero-E Offshore Wind S.L.U. (Spain) (a Cobra group company) and Flotation Energy Ltd.
Morgan and Morecambe Offshore Wind Farms: Transmission Assets	The offshore and onshore infrastructure connecting the Morgan Offshore Wind Project and the Morecambe Offshore Windfarm to the national grid. This includes the offshore export cables, landfall site, onshore export cables, onshore substations, 400 kV grid connection cables and associated grid connection infrastructure such as circuit breaker compounds. Also referred to in this report as the Transmission Assets, for ease of reading.
Morgan Offshore Wind Project: Generation Assets	The offshore generation assets and associated activities for the Morgan Offshore Wind Project.
Morgan Offshore Wind Project: Transmission Assets	The offshore export cables, landfall and onshore infrastructure required to connect the Morgan Offshore Wind Project to the National Grid.
Morgan OWL	Morgan Offshore Wind Limited is a joint venture between bp Alternative Energy Investments Ltd (bp) and Energie Baden-Württemberg AG (EnBW).
National Grid Penwortham substation	The existing National Grid substation at Penwortham, Lancashire.
National Policy Statement(s)	The current national policy statements published by the Department for Energy Security and Net Zero in 2023 and adopted in 2024.
Non-statutory consultee	Organisations that an applicant may choose to consult in relation to a project who are not designated in law but are likely to have an interest in the project.
Offshore export cables	The cables which would bring electricity from the Generation Assets to the landfall.
Offshore export cable corridor	The corridor within which the offshore export cables will be located.
Offshore Order Limits	See Transmission Assets Order Limits: Offshore (below).
Onshore export cables	The cables which would bring electricity from the landfall to the onshore substations.

Term	Meaning
Onshore export cable corridor	The corridor within which the onshore export cables will be located.
Onshore Infrastructure Area	The area within the Transmission Assets Order Limits landward of Mean High Water Springs. Comprising the offshore export cables from Mean High Water Springs to the transition joint bays, onshore export cables, onshore substations and 400 kV grid connection cables, and associated temporary and permanent infrastructure including temporary and permanent compound areas and accesses. Those parts of the Transmission Assets Order Limits proposed only for ecological mitigation/biodiversity benefit are excluded from this area.
Onshore Order Limits	See Transmission Assets Order Limits: Onshore (below).
Onshore substations	The onshore substations will include a substation for the Morgan Offshore Wind Project: Transmission Assets and a substation for the Morecambe Offshore Windfarm: Transmission Assets. These will each comprise a compound containing the electrical components for transforming the power supplied from the generation assets to 400 kV and to adjust the power quality and power factor, as required to meet the UK Grid Code for supply to the National Grid.
Planning Inspectorate	The agency responsible for operating the planning process for applications for development consent under the Planning Act 2008.
Policy	A set of decisions by governments and other political actors to influence, change, or frame a problem or issue that has been recognised as in the political realm by policy makers and/or the wider public.
Preliminary Environmental Information Report	A report that provides preliminary environmental information in accordance with the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017. This is information that enables consultees to understand the likely significant environmental effects of a project, and which helps to inform consultation responses.
Renewable energy	Energy from a source that is not depleted when used, such as wind or solar power.
Safety zones	An area around a structure or vessel which should be avoided.
Scoping Opinion	Sets out the Planning Inspectorate's response (on behalf of the Secretary of State) to the Scoping Report prepared by the Applicants. The Scoping Opinion contains the range of issues that the Planning Inspectorate, in consultation with statutory stakeholders, has identified should be considered within the Environmental Impact Assessment process.
Scour protection	Protective materials to avoid sediment being eroded away from the base of the foundations due to the flow of water.
Special Areas of Conservation	A site designation specified in the Conservation of Habitats and Species Regulations 2017. Each site is designated for one or more of the habitats and species listed in the Regulations. The legislation requires a management plan to be prepared and implemented for each SAC to ensure the favourable conservation status of the habitats or species for which it was designated. In combination with Special Protection Areas and Ramsar sites, these sites contribute to the national site network.
Special Protection Areas	A site designation specified in the Conservation of Habitats and Species Regulations 2017, classified for rare and vulnerable birds, and for regularly occurring migratory species. Special Protection Areas contribute to the national site network.

Term	Meaning
Statutory consultee	Organisations that are required to be consulted by an applicant pursuant to section 42 of the Planning Act 2008 in relation to an application for development consent. Not all consultees will be statutory consultees (see non-statutory consultee definition).
Substation	Part of an electrical transmission and distribution system. Substations transform voltage from high to low, or the reverse by means of electrical transformers.
The Secretary of State for Energy Security and Net Zero	The decision maker with regards to the application for development consent for the Transmission Assets.
Transboundary effects	Effects from a project within one state that affect the environment of another state(s).
Transmission Assets	See Morgan and Morecambe Offshore Wind Farms: Transmission Assets (above).
Transmission Assets Order Limits	The area within which all components of the Transmission Assets will be located, including areas required on a temporary basis during construction and/or decommissioning.
Transmission Assets Order Limits: Offshore	The area within which all components of the Transmission Assets seaward of Mean Low Water Springs will be located, including areas required on a temporary basis during construction and/or decommissioning. Also referred to in this report as the Offshore Order Limits, for ease of reading.
Transmission Assets Order Limits: Onshore	The area within which all components of the Transmission Assets landward of Mean High Water Springs will be located, including areas required on a temporary basis during construction and/or decommissioning (such as construction compounds). Also referred to in this report as the Onshore Order Limits, for ease of reading.
Voltage	Voltage is the pressure from an electrical circuit's power source that pushes charged electrons (current) through a conducting loop.

Acronyms

Acronym	Meaning
AEZ	Archaeological Exclusion Zone
APFP	Applications: Prescribed Forms and Procedure Regulations 2009
BEIS	The former Department for Business, Energy and Industrial Strategy
BHS	Biological Heritage Site
BNG	Biodiversity Net Gain
CEA	Cumulative Effects Assessment
CfDs	Contracts for Difference
CNP	Critical National Priority
CoCP	Code of Construction Practice

Acronym	Meaning
COP	Conference of the Parties
CSIP	Cable Specification and Installation Plan
DCO	Development Consent Order
DPD	Development Plan Documents
EA	Environment Agency
EIA	Environmental Impact Assessment
EMF	Electromagnetic Fields
EMP	Environmental Management Plan
EMR	Electricity Market Reform
EnBW	Energie Baden-Württemberg AG
EPP	Evidence Plan Process
ES	Environmental Statement
FRA	Flood Risk Assessment
GCN	Great-crested newt
GHG	Greenhouse Gas
GVA	Gross Value Added
HDD	Horizontal Directional Drilling
HNDR	Holistic Network Design Review
HRA	Habitats Regulation Assessment
IEMA	Institute for Environmental Management and Assessment
INNS	Invasive Non-native Species
ISAA	Information to Support Appropriate Assessment
LLFA	Lead Local Flood Authority
LRN	Local Road Network
MCZ	Marine Conservation Zone
MDS	Maximum Design Scenario
MMMP	Marine Mammals Mitigation Protocol
MMO	Marine Management Organisation
Morecambe OWL	Morecambe Offshore Windfarm Ltd
Morgan OWL	Morgan Offshore Wind Limited
MPA	Marine Protected Areas
MPS	Marine Policy Statement
NDC	Nationally Determined Contribution

Acronym	Meaning
NGESO	National Grid Electricity System Operator
NIC	National Infrastructure Commission
NPPF	National Planning Policy Framework
NPS	National Policy Statement
NRW	Natural Resources Wales
NSIP	Nationally Significant Infrastructure Project
OCTMP	Outline Construction Traffic Management Plan
OTNR	Offshore Transmission Network Review
OWES	Offshore Wind Environmental Standards
PEIR	Preliminary Environmental Information Report
SAC	Special Area of Conservation
SNCB	Statutory Nature Conservation Bodies
SPA	Special Protection Area
SRN	Strategic Road Network
SSC	Suspended Sediment Concentration
SSSI	Site of Special Scientific Interest
SuDS	Sustainable drainage systems
UK	United Kingdom
UNFCCC	United Nations Framework Convention on Climate Change
UXO	Unexploded Ordnance

Units

Unit	Description
%	Percentage
GW	Gigawatts
kg	Kilogram
km	Kilometres
m	Metres
MW	Megawatt
nm	Nautical mile

1 Planning Statement

1.1 Introduction

1.1.1.1 This Planning Statement has been prepared by RPS for the Morgan and Morecambe Offshore Wind Farms: Transmission Assets (referred to hereafter as the 'Transmission Assets'). Both Applicants are joint ventures made up of leading energy companies, bp and EnBW and Cobra and Flotation Energy Ltd, respectively. This Planning Statement is submitted as part of the application for development consent for the Transmission Assets.

1.1.1.2 This Planning Statement has been updated for Deadline 1 in response to the following Examining Authority Hearing Action Points arising out of Issue Specific Hearing 1:

- ISH1 Action Point 1 - Update planning statement clarifying applicants' position as to the application of section 104 Planning Act 2008.

1.1.1.11.1.1.3 The purpose of the Transmission Assets is to connect the Morgan Offshore Wind Project: Generation Assets and Morecambe Offshore Windfarm: Generation Assets (referred to collectively as the 'Generation Assets') to the National Grid at Penwortham in Lancashire. A description of the Transmission Assets can be found in Volume 1, Chapter 3: Project description of the Environmental Statement (ES) (document reference F1.3) and a summary is provided in **section 2** of this Planning Statement.

1.1.1.21.1.1.4 This Planning Statement is one of a series of documents that accompanies the application to the Secretary of State (the Application) submitted in accordance with section 37 of the Planning Act 2008 and Regulations 5 and 6 of the Infrastructure Planning (Application: Prescribed Forms and Procedures) Regulations 2009 (the 'APFP Regulations'). The APFP Regulations do not require a planning statement to support applications for development consent; however, in order to assist the Secretary of State in determining the application, it is considered helpful to bring all the principal matters together into one statement in order to consider them in the context of relevant policy.

1.1.1.31.1.1.5 The Transmission Assets have been subject to Environmental Impact Assessment (EIA), the outcomes of which have been reported in the ES that also accompanies the application (document references F1, F2, F3 and F4). In addition, the Transmission Assets have been subject to Habitats Regulations Assessment (HRA) in order to determine the potential impacts on Natura 2000 or European sites, the outcomes of which have been reported in the Information to Support Appropriate Assessment (ISAA) report, HRA Stage 1 Screening Report and accompanying annexes (document references E2.1, 2.2, 2.3 and E3).

1.1.1.41.1.1.6 Aspects concerning the need for the Transmission Assets, the site selection process and alternative designs and technologies considered by the Applicants during the design development process are explained fully in Volume 1, Chapter 4: Site selection and consideration of alternatives of the ES (document reference F1.4) and presented, where relevant, within **section**

5 of this Planning Statement. The legislative and policy context relating to renewable energy and the associated environmental assessments undertaken in relation to the Transmission Assets is set out in Volume 1, Chapter 2: Policy and legislative context of the ES (document reference F1.2). Other, more specific legislation and policy is set out as necessary in the various topic chapters of the ES. A detailed policy tracker for the National Policy Statements (NPSs), is provided as document reference J26. Trackers that cover the detail of compliance with the National Planning Policy Framework (NPPF), the relevant marine policy, and local policies are provided as annexes to this Planning Statement (document references J28.1, J28.2 and J28.3 respectively).

~~1.1.1.5~~1.1.1.7 The outcomes of the EIA (in the form of the ES) and the HRA (in the form of the ISAA) processes have informed the content of this Planning Statement, specifically in relation to assisting the determination of accordance of the Transmission Assets with relevant the NPSs, the NPPF, relevant marine policy and local planning policy.

~~1.1.1.6~~1.1.1.8 This Planning Statement considers the likely impacts and effects of the Transmission Assets in the context of relevant policy, whilst bringing together the principal matters relevant to each chapter of the ES during the construction, operation and maintenance, and decommissioning phases. It covers both the onshore and offshore elements of the Transmission Assets. It is structured as follows.

- **Section 1:** Introduction.
- **Section 2:** Location and project description.
- **Section 3:** Legislation, policy and guidance.
- **Section 4:** Need for the Transmission Assets.
- **Section 5:** Accordance with NPSs and other national and local policy.
- **Section 6:** Balance of considerations and overall conclusions.

1.2 About the Applicants

1.2.1.1 As stated in **section 1.1**, the Applicants are Morgan OWL and Morecambe OWL. Both Applicants are joint ventures made up of leading energy companies, bp and EnBW, and Zero-E Offshore Wind S.L.U. (Spain) (a Cobra group company) and Flotation Energy Ltd, respectively.

1.2.1.2 EnBW is one of the largest energy supply companies in Germany and supplies electricity, gas, water and energy solutions and energy industry services to around 5.5 million customers with a workforce of more than 27,000 employees. EnBW aims to strengthen its position as a sustainable and innovative infrastructure partner for customers, citizens and local authorities to an even greater extent. The repositioning of EnBW with a focus on renewable energies and smart infrastructure solutions is a key component of its strategy. With a focus on renewable energy and smart infrastructure solutions, EnBW's objective is for half of the electricity it supplies to be from renewable sources by the end of 2025. This is already having a noticeable effect on the reduction of CO₂ emissions, which EnBW aims to halve by 2030

and to be climate neutral by 2035. EnBW has been involved in the operation of hydro power plants in the Black Forest for more than 100 years and has a large and continuously growing number of onshore wind farms and solar photovoltaics in Germany, France and Sweden. In addition, EnBW developed, constructed and operates four offshore wind farms in Germany (EnBW Baltic 1, Baltic 2, Hohe See and Albatros) with a total installed capacity of 945 MW, commissioned between 2011 and 2020. A further 960 MW offshore wind farm, He Dreiht, is currently under construction in Germany.

- 1.2.1.3 bp is an international company that delivers energy products and services to our customers around the world. bp's strategy is to transition to become an integrated energy company across low carbon energy, resilient hydrocarbons, and mobility and convenience. bp is working to help deliver a better, more balanced, energy system that is secure and affordable as well as increasingly lower carbon.
- 1.2.1.4 bp is investing in offshore wind to establish a global position in the sector and build our portfolio to help serve the world's energy needs. This is part of bp's transformation to an integrated energy company and helping to play our part in providing secure, affordable and lower carbon energy.
- 1.2.1.5 In the UK, bp and partner EnBW are leading the development of the Morgan and Mona offshore wind projects in the Irish Sea and the Morven offshore wind project in the North Sea. These projects have a combined potential generating capacity of 5.9 GW, sufficient to power the equivalent of around 6 million UK households. In early 2023, bp was successful in its bid to develop its first floating offshore wind demonstration project offshore Aberdeenshire.
- 1.2.1.6 In Germany, bp is progressing plans to develop two projects, Oceanbeat East and Oceanbeat West, with a combined potential generating capacity of 4 GW. In Asia, bp has formed a strategic partnership with Marubeni to explore offshore wind opportunities in Japan. bp also established a joint venture with Norway's Deep Wind Offshore, which saw bp acquire a 55% stake in the company's early-stage offshore wind portfolio of projects around the Korean Peninsula.
- 1.2.1.7 Zero-E Offshore Wind S.L.U. (Spain) is a Cobra group company, where Cobra is a world leader in the development, construction and management of industrial infrastructure and energy projects, with 80 years of experience. Cobra is a worldwide reference with the capacity and determination to develop, create and operate industrial and energy infrastructures that require a high level of service, based on excellence in integration, technological innovation and financial strength.
- 1.2.1.8 Its unrivalled knowledge and understanding of floating offshore wind developments is a significant advantage in delivering a high quality and efficient project, coupled with its commitment to environmental stewardship. Cobra's experience as a major player in offshore wind is based on a 50 MW project in operation and over 11.2 GW under development.
- 1.2.1.9 Flotation Energy, headquartered in Edinburgh, Scotland, sits at the heart of the energy transition. It's determined to support the big switch to sustainable,

clean and affordable energy through the application of innovative offshore wind technology. An ambitious offshore wind developer, Flotation Energy has a 13GW portfolio that covers both fixed and floating developments globally, with projects in the UK, Ireland, Taiwan, Japan and Australia.

- 1.2.1.10** Whilst Flotation Energy develops projects independently, it also recognises the strategic value of partnership and collaboration to deliver proven, cost-effective solutions.

2 Location and project description

2.1 Project location

- 2.1.1.1 The Transmission Assets are located within the Transmission Assets Order Limits shown on **Figure 2.1** and described in **section 2.2**.
- 2.1.1.2 The offshore elements of the Transmission Assets are located in the east Irish Sea wholly within English offshore waters (beyond 12 nautical miles (nm) from the English coast) and inshore waters (within 12 nm from the English coast). The onshore elements of the Transmission Assets are located within the local authority areas of Fylde Council, Blackpool Council, South Ribble Borough Council, Preston City Council and Lancashire County Council.
- 2.1.1.3 Both the Morgan Offshore Wind Project and the Morecambe Offshore Windfarm were scoped into the 'Pathways to 2030' workstream under the Offshore Transmission Network Review (OTNR). The OTNR aims to consider, simplify, and wherever possible facilitate a collaborative approach to offshore wind projects connecting to the National Grid.
- 2.1.1.4 Under the OTNR, the National Grid Electricity System Operator (NGESO) is responsible for assessing options to improve the coordination of offshore wind generation connections and transmission networks and has undertaken a Holistic Network Design Review (HNDR). In July 2022, the UK Government published the 'Pathway to 2030 Holistic Network Design' documents, which set out the approach to connecting 50 GW of offshore wind to the National Grid (NGESO, 2022). A key output of the HNDR process was the recommendation that the Morgan Offshore Wind Project and the Morecambe Offshore Windfarm should work collaboratively in connecting the two offshore wind farms to the National Grid electricity transmission network at Penwortham in Lancashire.

2.2 Project description

- 2.2.1.1 This Planning Statement provides a high-level summary of the Transmission Assets. A more detailed description, including an explanation of all onshore and offshore elements of the Transmission Assets, is provided in Volume 1, Chapter 3: Project description of the ES (document reference F1.3).
- 2.2.1.2 The purpose of the Transmission Assets is to connect the Generation Assets to the National Grid electricity transmission network at Penwortham in Lancashire. The Generation Assets are each subject to separate applications

for development consent. Further details are provided in Volume 1, Chapter 2: Policy and legislation context (document reference F1.2).

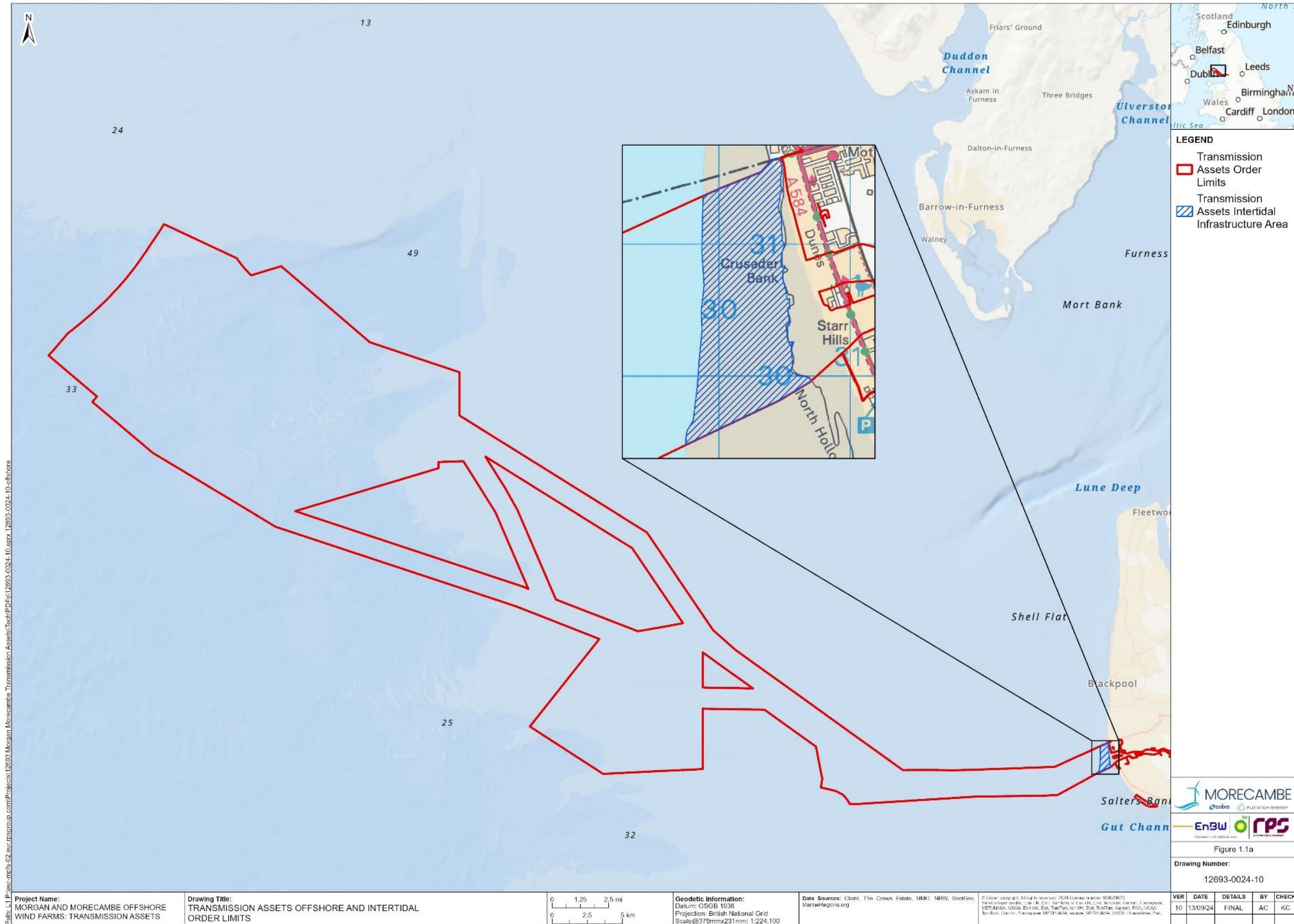


Figure 2.1a: Transmission Assets Order Limits (Offshore)

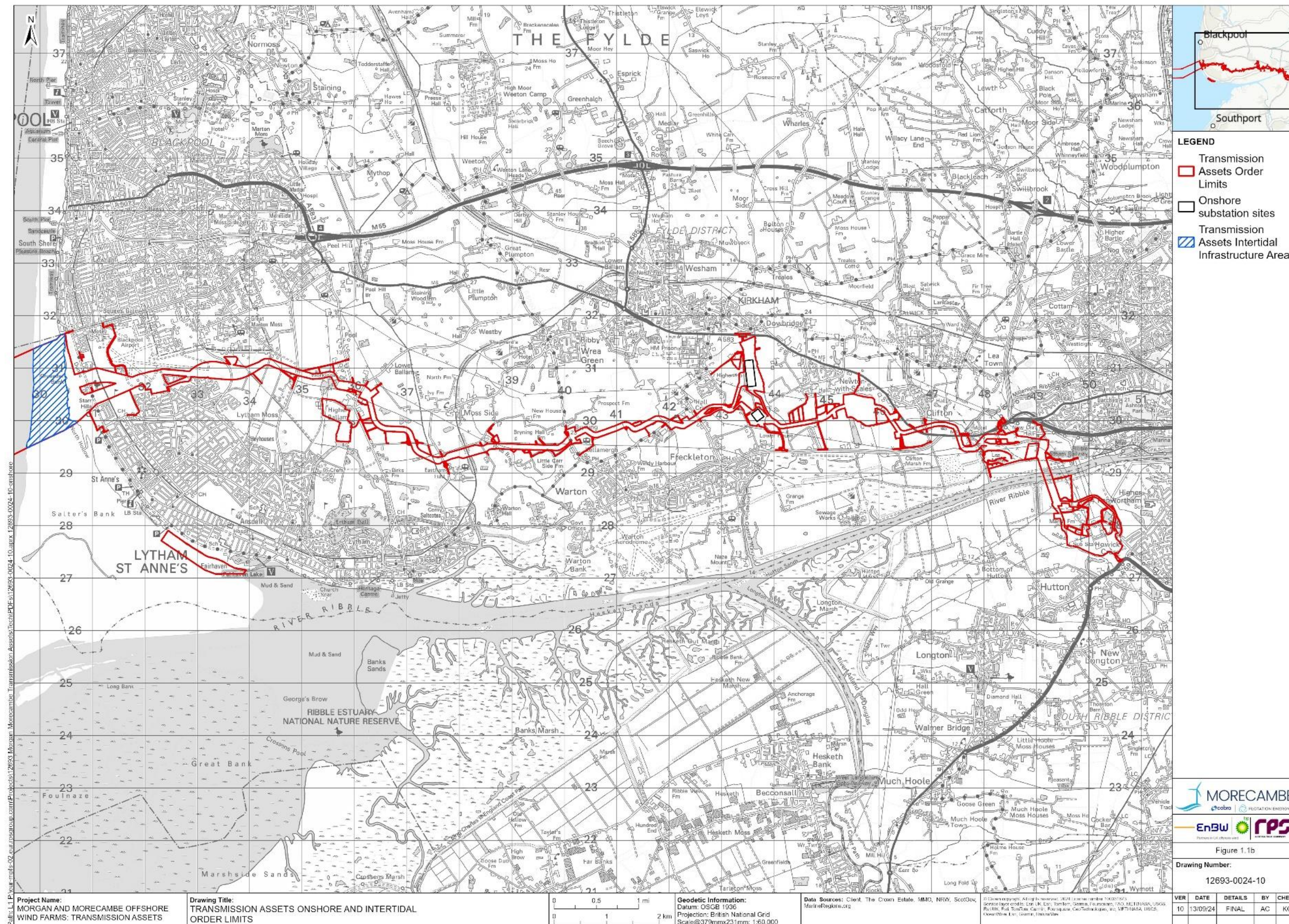


Figure 2.1b: Transmission Assets Order Limits (Onshore)

- 2.2.1.3 The application for development consent for the Transmission Assets includes the following:
- Morgan Offshore Wind Project: Transmission Assets – the offshore export cables, landfall and onshore infrastructure required to connect the Morgan Offshore Wind Project to the National Grid; and
 - Morecambe Offshore Windfarm: Transmission Assets - the offshore export cables, landfall and onshore infrastructure required to connect the Morecambe Offshore Windfarm to the National Grid.
- 2.2.1.4 The design philosophy is for the transmission infrastructure for each wind farm to remain electrically and commercially independent (i.e., each wind farm to have its own sets of cabling and substation infrastructure). However, the location of the infrastructure will be aligned within offshore and onshore cable corridors to minimise impacts to the environment and the community.
- 2.2.1.5 The key components of the Transmission Assets include:
- Offshore elements:
 - offshore export cables: these export cables will bring the electricity generated by the Generation Assets to the landfall for onward transmission.
 - Landfall:
 - landfall site: this is where the offshore export cables are jointed to the onshore export cables via the transition joint bays. This term applies to the entire area between Mean Low Water Springs and the transition joint bays.
 - Onshore elements:
 - onshore export cables: these export cables will be jointed to the offshore export cables via the transition joint bays at the landfall site, and will bring the electricity generated by the Generation Assets to the onshore substations;
 - onshore substations: the two electrically separate onshore substations will contain the components for transforming the power supplied via the onshore export cables up to 400 kV;
 - 400 kV grid connection cables: these export cables will bring the electricity generated by the Generation Assets from the two electrically separate onshore substations to the existing National Grid substation at Penwortham;
 - environmental mitigation areas: temporary and/or permanent areas, including accesses identified to provide environmental mitigation only; and
 - biodiversity benefit areas: temporary and/or permanent areas, including accesses identified to provide biodiversity benefit only.
- 2.2.1.6 The onshore export cables and the 400 kV grid connection cables will be completely buried underground for their entire length. No overhead pylons will be installed as part of the Transmission Assets.

- 2.2.1.7 In addition to the permanent components outlined in **paragraph 2.2.1.5**, temporary onshore infrastructure would be required for the construction phase, including construction compounds and accesses.
- 2.2.1.8 All of the above elements will be located within the Transmission Assets Order Limits shown on **Figure 2.1**.

3 Legislation, policy and guidance

3.1 Introduction

- 3.1.1.1 The Secretary of State for the Department for Business, Energy and Industrial Strategy (BEIS) (the department which preceded the Department for Energy Security and Net Zero) has directed that the Transmission Assets are to be treated as development for which development consent is required under the Planning Act 2008, as amended (referred to in this document as ‘the Planning Act 2008’), as set out in Volume 1, Chapter 1: Introduction to the ES (document reference F1.1). The direction is provided in document reference J24: Direction by the Secretary of State under section 35 of the Planning Act 2008.
- 3.1.1.2 This section outlines the legislative and policy framework that is relevant to the Transmission Assets and, in particular, that which should be considered by the Secretary of State when determining this application for development consent under the Planning Act 2008.
- 3.1.1.3 Policy and legislation specific to individual environmental topics and EIA are set out within each topic chapter of the ES (see Volumes 2, 3 and 4 of the ES: document references F2, F3 and F4).

3.2 International climate change commitments

3.2.1 Overview

- 3.2.1.1 Climate change and renewable energy policy in the UK is underpinned by international commitments, which are summarised below.

3.2.2 United Nations Framework Convention on Climate Change

- 3.2.2.1 The United Nations Framework Convention on Climate Change (UNFCCC) is an intergovernmental treaty that came into force on 21 March 1994. Its objective was to achieve:
- ‘Stabilization of greenhouse gas concentrations in the atmosphere at a level that would prevent dangerous anthropogenic interference with the climate system’* (Article 2 of the UNFCCC) (United Nations, 1992).
- 3.2.2.2 To date, the UNFCCC has been ratified by 197 signatories, including the UK. The first agreement was the Kyoto Protocol, which was signed in 1997. A number of meetings of the UNFCCC have taken place since 1997, resulting in several important and binding agreements, summarised in the following sections.

3.2.3 Kyoto Protocol

- 3.2.3.1 The UK is a signatory to the Kyoto Protocol, an international agreement for the implementation of the UNFCCC. The Kyoto Protocol commits industrialised countries and economies to limit and reduce greenhouse gas emissions in accordance with agreed individual targets. The UNFCCC asks those countries to adopt policies and measures on mitigation and to report periodically. The protocol came into effect in 2005 and its commitments were transposed into UK law by the Climate Change Act 2008, as amended.
- 3.2.3.2 The protocol initially placed a duty on the UK to ensure that the net UK carbon account for the year 2050 was 80% lower than the 1990 baseline. Due to increasing awareness of the need for more urgent action, this was revised to a 'net zero target' by the Climate Change Act 2008 (2050 Target Amendment) Order 2019. This revised target was for greenhouse gas emissions to be 100% lower than 1990 levels by the year 2050.

3.2.4 The United Nations Adoption of the Paris Agreement COP21

- 3.2.4.1 In December 2015, 195 signatories, including the UK, adopted the first universal, legally binding global climate deal at the Paris climate conference, Conference of Parties (COP) 2015 (COP21). The Paris Agreement (United Nations, 2015) seeks to reduce global greenhouse gas emissions and to limit the global temperature increase in this century to 'well below' 2°C, while pursuing the means to limit this further to 1.5°C. This was ratified by the UK Government in November 2016 and is a binding international treaty.
- 3.2.4.2 The Paris Agreement requires countries to submit a Nationally Determined Contribution (NDC) to the UNFCCC. The UK's NDC (HM Government, 2022) commits the UK to reducing economy-wide greenhouse gas emissions by at least 68% by 2030, compared to 1990 levels.

3.2.5 The Glasgow Pact COP26, COP27 and COP28

- 3.2.5.1 At the COP26 summit in November 2021, nearly 200 parties voted to adopt the Glasgow Climate Pact (UNFCCC, 2021). This includes commitments to phase down the use of coal and supports a common timeframe and methodology for national commitments on emissions reductions. Countries were tasked to return in 2022 with more ambitious 2030 emissions reductions targets. The COP27 summit in November 2022 made little further progress on the emissions reduction ambitions discussed at COP26.
- 3.2.5.2 The COP28 summit, held in November/December 2023, resulted in a decision to accelerate action across all areas by 2030, including a call on governments to transition away from fossil fuels to renewables such as wind and solar power in their next round of climate commitments. At COP29, governments must establish a new climate finance goal reflecting the scale and urgency of the climate challenge.
- 3.2.5.3 The COP28 summit also included the first 'global stocktake', which assessed global progress towards the goals of the Paris Agreement. The stocktake concluded that implementation of the Paris Agreement is lacking throughout

the world, with a clear gap between individual countries' stated ambitions (through NDCs) and mitigation actions and policies to achieve those goals.

3.3 UK climate change and renewable energy commitments

3.3.1 Overview

3.3.1.1 The UK has a range of legislation and policies relating to climate change and renewable energy, a summary of which is provided below.

3.3.2 The Climate Change Act 2008 (as amended)

3.3.2.1 As set out in **section 3.2.3**, the Climate Change Act 2008 originally committed the UK to a net reduction in greenhouse gas emissions of 80% by 2050 against the 1990 baseline in line with the commitments of the Kyoto Protocol.

3.3.2.2 In June 2019, secondary legislation (the Climate Change Act 2008 (2050 Target Amendment) Order 2019) was passed that extended that target to at least 100% against the 1990 baseline.

3.3.2.3 The Climate Change Act 2008 also established the Committee on Climate Change (now the Climate Change Committee), which advises the UK and devolved governments on emissions targets and reports to Parliament on progress made. In May 2011, the Climate Change Committee published the Renewable Energy Review (Climate Change Committee, 2011), which explores the potential for renewable energy development and its role in achieving emissions reduction targets. The Renewable Energy Review states that renewable energy developments will provide a significant contribution to the decarbonisation of the national grid by 2030.

3.3.2.4 The Climate Change Committee has since produced six carbon budgets, covering 2008 to 2037. These carbon budgets represent a limitation on the total quantity of greenhouse gas emissions to be emitted over each five-year period. The sixth carbon budget is the most recent carbon budget to be published, covering 2033 to 2037 (Climate Change Committee, 2020). The budget states that electricity demand is predicted to rise by 50% by 2035 and at least double by 2050, mostly through reduced reliance on high carbon energy sources such as fossil fuels. Therefore, decarbonisation of electricity production is essential. Suggested changes to electricity generation include:

- expansion of low carbon energy supplies, with 100% of electricity production coming from low carbon sources by 2035, mostly from renewables; and
- increasing renewables to 60% of total energy generation by 2030, 70% by 2035 and 80% by 2050, with offshore wind being 'the backbone of the system' (Climate Change Committee, 2020, chapter 3 section 4: Electricity generation).

3.3.2.5 The 7th carbon budget, covering the period 2038 to 2042, is due to be set in 2025.

3.3.3 The Energy Act 2013

- 3.3.3.1 The Energy Act introduced a legislative framework for delivering secure, affordable and low carbon energy. It included provisions to incentivise investment in low carbon electricity generation, ensure security of supply, and help the UK meet its emission reduction and renewables targets. In particular, the Energy Act 2013 contained provisions for Electricity Market Reform (EMR).
- 3.3.3.2 EMR was designed to enable the UK to develop a clean, diverse and competitive mix of electricity generation that will ensure we meet targets on decarbonisation and security of supply, while keeping bills as low as possible for consumers now and in the future (BEIS, 2022).
- 3.3.3.3 EMR comprised two main policy areas to deliver the above:
- capacity market: to ensure security of electricity supply at least cost to the customer; and
 - Contracts for Difference (CfDs): to provide long-term revenue stabilisation for new low carbon electricity generation in Great Britain.

3.3.4 The Clean Growth Strategy 2017

- 3.3.4.1 The Clean Growth Strategy (HM Government, 2017) emphasised the need to grow national income, while cutting greenhouse gas emissions. Its aim to achieve clean growth, while ensuring an affordable energy supply for businesses and consumers, is at the heart of the UK's Industrial Strategy.

3.3.5 National Infrastructure Assessment 2018 and 2023

- 3.3.5.1 The National Infrastructure Commission (NIC) provides advice on the UK's national infrastructure and an assessment of our infrastructure needs to 2050 and beyond.
- 3.3.5.2 The first National Infrastructure Assessment was published in 2018 (NIC, 2018), which highlighted the need for the UK to have low cost and low carbon electricity. It proposed a highly renewable generation mix as a low-cost option for the energy system, with at least 50% renewable generation by 2030. It proposed the continued use of mechanisms such as CfDs to achieve this and set out that offshore wind should be recognised as cost competitive.
- 3.3.5.3 The case for at least 50% renewable generation by 2030 was reaffirmed by the NIC's Net Zero: Opportunities for the power sector paper (NIC, 2020). This paper confirmed that renewables costs have fallen faster than forecast. It states that:

'The government's ambition to deploy 40 GW of offshore wind will go a long way to delivering at least 50 per cent renewable generation by 2030. This positive progress needs to continue. Delivering the Commission's recommendations would allow government to take the needed concrete action in the near term, whilst not closing down options for the future' (NIC, 2020, Recommendations from the National Infrastructure Assessment).

3.3.5.4 As part of the work towards the second National Infrastructure Assessment, a baseline report was published in 2021 (NIC, 2021). This identified the following area for improvement: *‘greenhouse gas emissions from economic infrastructure must reduce further, fast’*. It also identified two strategic themes for the second National Infrastructure Assessment relevant to climate change and renewable energy.

- Reaching net zero: all sectors have more to do to reach net zero, including energy, where government has committed to decarbonise electricity generation by 2035.
- Climate resilience and the environment: while economic infrastructure has generally proved resilient to shocks and stresses over recent years, climate change will only increase pressures across all sectors, and infrastructure sectors have significant effects – both positive and negative – on the environment.

3.3.5.5 The second National Infrastructure Assessment was published in October 2023 (NIC, 2023) and provides an assessment of the UK’s infrastructure needs to 2055 and beyond. This report recognises that the UK has already made significant progress in boosting renewable electricity generation, but highlights that there is still progress to be made to address three key challenges:

- decarbonising energy and achieving net zero emissions;
- supporting economic growth across all regions; and
- improving climate resilience and the environment.

3.3.5.6 With regards to energy security, the report states that: ‘By 2035, the UK needs a reliable electricity system running mostly on renewable power. Government should accelerate the deployment of offshore wind, onshore wind and solar power.’

3.3.6 The UK Offshore Wind Sector Deal 2019

3.3.6.1 The UK Government published the Offshore Wind Sector Deal in 2019, which sets the key commitments and actions from the UK Government to support offshore wind energy development (HM Government, 2020a). Since its launch in 2019, the UK Government and the offshore wind energy sector have made progress on delivering the commitments and actions set out in the Sector Deal. Commitments include:

- to be the world’s most innovative economy, including funding and support to research and development in offshore wind;
- to generate good jobs and greater earning power for all, including building skills and knowledge accessibility and investment in talent;
- a major upgrade to the UK’s infrastructure, including collaboration to deliver an efficient, secure and integrated energy system;
- the best place to start and grow a business, including building of supply chains and development of future technology; and

- to have prosperous places throughout the UK, including investment in projects that will benefit local communities and working with development agencies.

3.3.6.2 In 2020, the UK Government prepared a policy paper to reflect on the status of the offshore wind industry one year after the publication of the Offshore Wind Sector Deal (HM Government, 2020b). This identified that good progress was being made, including the development of regional clusters, the setup of the Offshore Wind Innovation Group and the commitment to £557 million for CfD auctions and policy support for offshore wind, along with the support for future wind farms.

3.3.7 National Infrastructure Strategy 2020

3.3.7.1 The National Infrastructure Strategy was published in November 2020 and sets out the plan for the UK's infrastructure revolution, alongside the plans for levelling up. It responds to the recommendations made in the National Infrastructure Assessment (HM Treasury, 2020). Commitments include:

- significant investment in offshore wind and into modern ports and manufacturing infrastructure to expand the share of energy generation from renewables; and
- supporting jobs and growth across the UK, particularly in post-industrial and coastal towns.

3.3.7.2 The government's decarbonisation agenda will build the UK's capability in new green industries. Infrastructure investment in offshore wind capacity (40 GW by 2030) and port infrastructure will create jobs in coastal communities.

3.3.8 The Ten Point Plan for a Green Industrial Revolution 2020

3.3.8.1 The UK's Ten Point Plan (HM Government, 2020c) intends to set the foundations for a 'Green Industrial Revolution ... creating jobs through harnessing British science and technology to create and use clean energy'. Point one of the Ten Point Plan is 'Advancing Offshore Wind'.

3.3.8.2 The Ten Point Plan notes that offshore wind is a critical source of renewable energy for our growing economy and that by 2030 the Government plans to quadruple our offshore wind capacity, backing new innovations to make the most of this proven technology and investing to bring new jobs and growth to our ports and coastal regions. It confirms the NIC's aim of 40 GW of offshore wind by 2030 and sets out a proposed £160 million investment programme for modern ports and manufacturing infrastructure.

3.3.9 The Energy White Paper: Powering our Net Zero Future 2020

3.3.9.1 Following the Prime Minister's Ten Point Plan (HM Government, 2020c), and National Infrastructure Strategy (HM Treasury, 2020), the Energy White Paper (HM Government, 2020d) marked a significant milestone in the UK's net zero transition, setting a net zero target by 2050 and outlining how this may be achieved. It relates to the generation, supply and use of energy with

the drive towards net zero by 2050 at its core, along with energy efficient buildings and lower household bills. It signalled a decisive move away from fossil fuel generation and highlights how planned Government investment has the potential to leverage billions of pounds in private sector funding and support for over 250,000 jobs in the green economy by 2030.

- 3.3.9.2 In particular, the introduction of the White Paper set out an aim to quadruple offshore wind capacity by 2030, ‘backing new innovations to make the most of this proven technology and investing to bring new jobs and growth to our ports and coastal regions’. It included a target for 40 GW of offshore wind by 2030 (in line with the National Infrastructure Strategy).

3.3.10 Net Zero Strategy: Build Back Greener 2021

- 3.3.10.1 Building on the Ten Point Plan, the Energy White Paper, and the requirements of the Climate Change Act 2008 (2050 Target Amendment) Order 2019, the Government published its Net Zero Strategy in 2021 (HM Government, 2021a). This sets out the long-term plan to end the UK’s contribution to man-made climate change by 2050. The key policies in the net zero strategy include that:

- by 2035 the UK will be powered entirely by clean electricity, subject to security of supply; and
- 40 GW of offshore wind will be delivered by 2030.

- 3.3.10.2 The strategy proposed that the UK should lead the way in meeting the commitments made at COP26 in Glasgow.

3.3.11 British Energy Security Strategy 2022

- 3.3.11.1 On 7 April 2022, the UK Government published its British Energy Security Strategy (BEIS and Prime Minister’s Office, 2022). The strategy builds on the UK net zero target, placing a heavy reliance on a renewable and low carbon energy supply with a view to ‘*bring clean, affordable, secure power to the people for generations to come*’.

- 3.3.11.2 The strategy plans to accelerate delivery of offshore wind by strengthening the renewable NPSs (see **section 3.4.4**) to reflect the importance of energy security and net zero. It proposes work with an Offshore Wind Acceleration Task Force to work on reducing the consenting and delivery times for offshore wind projects and fast-tracking priority projects, including the development of an Offshore Wind Environmental Improvement Package. Specifically, the strategy states an ambition to deliver up to 50 GW of offshore wind by 2030, an increase on previous targets of 40 GW.

3.3.12 Great British Energy

- 3.3.12.1 The new Government has confirmed its commitment to renewable energy, including offshore wind. This includes a commitment to future offshore wind projects, including making Britain a clean energy superpower by 2030, as set out in the Great British Energy founding statement (DESNZ, 2024a).

3.4 Planning legislation and policy

3.4.1 The Planning Act 2008

- 3.4.1.1 The Planning Act 2008 is the primary legislation that establishes the legal framework for applying for, examining and determining applications for Nationally Significant Infrastructure Projects (NSIPs). The key stages of the consenting process under the Planning Act 2008 as well as other environmental regulations are summarised in Volume 1, Chapter 2: Policy and Legislation context of the ES (document reference F1.2).
- 3.4.1.2 As set out in Volume 1, Chapter 1: Introduction of the ES (document reference F1.1), the Generation Assets fall within the definition of an NSIP, as they each exceed the threshold for an offshore generating station with a capacity of more than 100 MW, set under the Planning Act 2008. These are the subject of separate applications for development consent. These applications were made in April and May 2024 for Morgan Offshore Wind Project: Generation Assets and Morecambe Offshore Windfarm: Generation Assets respectively.
- 3.4.1.3 As set out in **section 2.1**, a key output of the HNDR process was that Morgan OWL and Morecambe OWL should work collaboratively in connecting the Generation Assets to the National Grid electricity transmission network at Penwortham in Lancashire.
- 3.4.1.4 The Applicants have worked closely to identify how best to develop (and consent) a co-ordinated but electrically and commercially separate grid connection. The output of this process has been to pursue a co-ordinated grid connection whereby both wind farms:
- consent their Generation Assets separately (so that they remain commercially and geographically distinct and subject to their individual agreements for lease with The Crown Estate); and
 - pursue a joint consent for the Transmission Assets (covering both projects' offshore export cables and onshore transmission infrastructure).
- 3.4.1.5 Key reasons for selecting this consenting approach are to:
- allow for better consideration and assessment of potential impacts (including beneficial and cumulative impacts);
 - facilitate more efficient use of stakeholder resources to minimise stakeholder fatigue or confusion;
 - provide a formal structure for the projects to collaborate and align on routing and siting, transmission design, assessment and mitigation approach;
 - align with the NPSs for delivering major energy infrastructure (for example paragraphs 4.24, 4.2.5, 4.11.3 and 4.11.4 of NPS EN-1 (DESNZ, 2023a) and sections 2.7 and 2.13 of NPS EN-5 (DESNZ, 2023c); and
 - avoid separate complex consenting processes locally and nationally, enabling alignment and timetabling certainty, reducing the potential for

delays from the consenting of the necessary Transmission Assets to delay the delivery of two NSIP Generation Assets projects.

3.4.1.6

The application for development consent covers the following key components.

- Offshore:
 - offshore export cables: these export cables will bring the electricity generated by the Generation Assets to the landfall for onward transmission.
- Landfall:
 - landfall site: this is where the offshore export cables are joined to the onshore export cables via the transition joint bays. This term applies to the entire area between Mean Low Water Springs and the transition joint bays.
- Onshore elements:
 - onshore export cables: these export cables will be joined to the offshore export cables via the transition joint bays at the landfall site, and will bring the electricity generated by the Generation Assets to the onshore substations;
 - onshore substations: the two electrically separate onshore substations will contain the components for transforming the power supplied via the onshore export cables up to 400 kV; and
 - 400 kV grid connection cables: these export cables will bring the electricity generated by the Generation Assets from the two electrically separate onshore substations to the existing National Grid substation at Penwortham.
 - environmental mitigation areas: temporary and/or permanent areas, including accesses identified to provide environmental mitigation only.
 - biodiversity benefit areas: temporary and/or permanent areas, including accesses identified to provide biodiversity benefit only.

3.4.1.7

Applications for development consent are examined by the Planning Inspectorate and determined by the Secretary of State. Consent takes the form of a Development Consent Order (DCO).

3.4.1.8

In accordance with section 104(2) of the Planning Act 2008, in determining applications for consent, the Secretary of State may have regard to:

- any national policy statement (NPS) which has effect in relation to development of the description to which the application relates;
- the appropriate marine policy documents;
- any local impact report;
- any matters prescribed in relation to development of the description to which the application relates; and

- any other matters which the Secretary of State thinks are both important and relevant to its decision.

3.4.1.9 Section 104(3) highlights the importance of NPSs in relation to decision making, requiring applications to be decided in accordance with any relevant NPS, except where any of the following apply:

- the decision would lead to breaching of international obligations (section 104(4) or statutory duty (section 104(5));
- the decision would be unlawful by virtue of any enactment (section 104(6));
- the adverse impact of the development is considered to outweigh its benefits; or
- a condition prescribed for deciding an application otherwise than in accordance with a national policy statement would be met.

3.4.1.10 Section 104 of the Planning Act 2008 applies in relation to an application for an order granting development consent if a national policy statement has effect in relation to development of the description to which the application relates (section 104(1)). In this case NPS EN-1 prescribes that '*EN-1, in conjunction with any relevant technology specific NPS, will be the primary policy for Secretary of State decision making on projects in the field of energy for which a direction has been given under section 35.*' The Transmission Assets are a project in the field of energy for which a direction has been given under section 35 and, given that EN-1 prescribes that it (in conjunction with the relevant technology specific NPSs, in this case EN-3 and EN-5) is the primary policy for such projects, there is a national policy statement which has effect in relation to the Transmission Assets.

3.4.1.11 It is noted that the section 35 direction issued for the Transmission Assets does not explicitly state that the DCO should be determined under section 104 or section 105 of the Planning Act 2008. The Applicants do not consider that this is necessary for section 104 to apply, given the clear wording of NPS EN-1; however if section 105 were to apply then the Applicants are of the view that, under section 105(2)(b) 'any matters prescribed in relation to development of the description to which the application relate' directs the Secretary of State to determine the application based on NPS EN-1, EN-3 and EN-5 as these are considered to be highly relevant and important policy related to the matters prescribed in this application for development consent.

3.4.1.12 Therefore, the Applicants are of the position that, regardless of the application should be being determined under section 104 or section 105 of the Planning Act 2008, and consequently NPS EN-1, EN-3 and EN-5 are the primary policy documents for decision-making.

3.4.1.13 The Government has published a consultation on reform to the consenting process for NSIPs (former Department for Levelling Up, Housing and Communities, 2023a). In March 2023, the government updated its Nationally Significant Infrastructure Projects Reform Action Plan (Former Department for Levelling Up, Housing and Communities, 2024). This sets out proposed reforms to deliver commitments to making the infrastructure consenting process better, faster, greener, fairer and more resilient. This includes a

commitment to regular review of the NPSs to provide a clear strategic direction for infrastructure planning. In addition, a tranche of updated guidance reflecting reforms to the NSIP process has been published.

- 3.4.1.14 The Planning Inspectorate will move from publishing advice notes to publishing updated advice pages. These are being revised to meet government and accessibility standards for publishing online content, both to address the needs of specific users and to include certain operational aspects of the government's reforms to complement new guidance. In addition, more specific advice on newer areas of technology, such as solar, will be published.

3.4.2 Powering Up Britain: The Net Zero Growth Plan 2023

- 3.4.2.1 Due to a successful legal challenge on the 2021 Net Zero Strategy (HM Government, 2021a), the UK Government published an updated strategy in March 2023, titled 'the Net Zero Growth Plan' (HM Government, 2023a). This plan largely restated existing policy contained within previous policy papers above. The plan confirmed the UK's commitment to having a decarbonised power system by 2035, with the majority of power generated from renewable sources such as wind and solar. It targets an increase to 50 GW of offshore wind capacity by 2030.

3.4.3 The Marine and Coastal Access Act 2009

- 3.4.3.1 Parts 3 and 4 of the Marine and Coastal Access Act 2009 contain a requirement to obtain a marine licence for certain activities and works at sea.
- 3.4.3.2 Section 149A of the Planning Act 2008 allows applicants for development consent to apply for 'deemed marine licences' as part of the consenting process. The Marine Management Organisation (MMO) are the responsible authority for deemed marine licences in English waters and work with the Planning Inspectorate to ensure that deemed marine licences are transposed into the DCO. The MMO remain the regulatory compliance monitoring and enforcement body in respect of the conditions contained within the deemed marine licences.
- 3.4.3.3 Part 5 of the Marine and Coastal Access Act 2009 enables the designation of Marine Conservation Zones (MCZs) in England and Wales as well as UK offshore areas. Consideration of MCZs is required for any marine licence application or application for development consent within an MCZ which includes a deemed marine licence. A Marine Conservation Zone Assessment (document reference E4) accompanies the DCO application.

3.4.4 Planning for new energy infrastructure: National Policy Statements

- 3.4.4.1 There are currently six energy NPSs, three of which contain policy relevant to offshore wind development and the Transmission Assets, specifically:
- Overarching NPS for Energy (NPS EN-1) which sets out the UK Government's policy for the delivery of major energy infrastructure (DESNZ, 2023a);

- NPS for Renewable Energy Infrastructure (NPS EN-3) (DESNZ, 2023b); and
- NPS for Electricity Networks Infrastructure (NPS EN-5) (DESNZ, 2023c).

3.4.4.2 The NPSs describe the national need case and establish the need for certain types of infrastructure development including energy, as well as identifying key issues that should be considered by the Examining Authority and the Secretary of State when examining and determining an application for development consent under the Planning Act 2008.

3.4.4.3 The key requirement from section 104 of the Planning Act 2008 is to assess, on balance, whether the application is in accordance with the relevant NPSs and whether any specified exceptions apply. This may include considering whether the policies set out in the NPSs for delivery of renewable energy are outweighed by any adverse impacts that have been identified, noting the presumption is in favour of applications which accord with any relevant NPSs, in particular those projects for which a Critical National Priority (CNP) has been established.

3.4.4.4 As explained in paragraphs 3.4.1.10 and 3.4.1.12, the Applicants are of the position view that ~~„regardless of~~ the application should be determined under section 104 ~~or section 105~~ of the Planning Act 2008; NPS EN-1, EN-3 and EN-5 are therefore the primary policy documents for decision-making, and ~~therefore~~ the assessment presented in this Planning Statement is made on this basis.

3.4.4.5 An NPS tracker (document reference J26) is submitted with this application and provides a detailed analysis of how the Transmission Assets application accords with the relevant NPSs.

Overarching National Policy Statement for Energy (EN-1)

3.4.4.6 This is the overarching energy NPS, setting out the broad basis for considering applications for development consent. It sets out the Government's policy for the delivery of major energy infrastructure.

3.4.4.7 Of relevance to the Transmission Assets, paragraphs 3.2.6 to 3.2.7 of NPS EN-1 state that *'The Secretary of State should assess all applications for development consent for the types of infrastructure covered by this NPS on the basis that the government has demonstrated that there is a need for those types of infrastructure which is urgent, as described for each of them in this Part'*, with substantial weight given to this need when considering applications for development consent under the Planning Act 2008.

3.4.4.8 In addition, the Secretary of State is not required to consider separately the specific contribution of any individual project to satisfying the need established in this NPS (paragraph 3.2.8).

3.4.4.9 For proposals requiring development consent under section 35 of the Planning Act 2008, as is the case for the Transmission Assets, paragraph 3.2.12 establishes that:

'In these circumstances any application for development consent would need to be considered in accordance with this NPS.'

In particular:

...

• where the application is for electricity network infrastructure not covered by sections 15-21 of the Planning Act, including underground or offshore infrastructure, the Secretary of State should give substantial weight to the need established at paragraphs 3.3.65 to 3.3.83 of this NPS...

- 3.4.4.10 Paragraph 3.3.3 stresses the importance of ensuring that there is sufficient electricity to meet demand and that new electricity infrastructure will have to be built to replace output from retiring plants and to ensure we can meet increased demand. Paragraph 3.2.8 confirms that, when determining applications for national infrastructure, the Secretary of State is *'not required to consider separately the specific contribution of any individual project to satisfying the need established in this NPS.'*
- 3.4.4.11 Whilst there is a general presumption in favour of consenting renewable energy projects based on the Government's assessment of the need for electricity generating capacity as set out in paragraphs 3.3.57 to 3.3.63, the NPS includes a strengthened presumption specifically in favour of CNP infrastructure.
- 3.4.4.12 Paragraphs 3.3.62 and 4.2.4 of NPS EN-1 confirm that the *'Government has concluded that there is a critical national priority (CNP) for the provision of nationally significant low carbon infrastructure.'*
- 3.4.4.13 Section 4.2 of NPS EN-1 sets out which energy generating technologies are identified as low carbon and are therefore CNP infrastructure. Paragraph 4.2.5 of NPS EN-1 states that for electricity generation CNP infrastructure includes *'... all onshore and offshore generation that does not involve fossil fuel combustion....'* and for electricity grid infrastructure it includes *'all power lines in scope of EN-5 including network reinforcement and upgrade works, and associated infrastructure such as substations'*. The same paragraph clarifies that the definition as CNP infrastructure also applies to *'... energy infrastructure which is directed into the NSIP regime under section 35 of the Planning Act 2008, and fit within the normal definition of "low carbon", such as interconnectors, Multi-Purpose Interconnectors, or 'bootstraps' to support the onshore network which are routed offshore.'* The Transmission Assets are of the type considered to be CNP infrastructure in EN-1 as they have been directed into the NSIP regime by a section 35 direction (which expressly confirms that *'the Secretary of State is of the view that the proposed project (is nationally significant)'* and an essential part of a 'low carbon' infrastructure project. As these are the type of works that are covered by NPS EN-1 paragraph 4.2.5, the Applicants consider that the Transmission Assets benefit from the policy support provided to CNP infrastructure.
- 3.4.4.14 The strengthened presumptions in favour of CNP infrastructure include that even *'where residual non-HRA or non-MCZ impacts remain after the mitigation hierarchy has been applied, these residual impacts are unlikely to outweigh the urgent need for this type of infrastructure'* (paragraph 4.2.15, NPS EN-1). The paragraph then goes on to confirm *'...in all but the most exceptional circumstances, it is unlikely that consent will be refused on the basis of these residual impacts.'*

- 3.4.4.15 Paragraph 4.2.16 of NPS EN-1 then confirms that the starting point for decision making by the Secretary of State is that CNP infrastructure is to be treated as if it has met any tests which are set out within the NPSs, or any other planning policy, which requires a clear outweighing of harm, exceptionality or very special circumstances. This includes development within Green Belt, development affecting Sites of Special Scientific Interest (SSSIs), development in nationally designated landscapes and where there is substantial harm to or loss of significance to heritage assets (paragraph 4.2.17) if the applicant demonstrates that the mitigation hierarchy, requirements of EN-1 and the relevant technology specific NPS have been applied, as well as any other legal and regulatory requirements.
- 3.4.4.16 Similarly, in terms of any HRA or MCZ residual impacts, paragraphs 4.2.18 to 4.2.22 of NPS EN-1 confirm that the starting point is that energy security and decarbonising the power sector to combat climate change are capable of amounting to imperative reasons of overriding public interest with the benefit to the public being capable of outweighing the risk of environmental damage. These paragraphs also confirm that the fact there are other potential projects deliverable in different locations to meet the need for CNP infrastructure is unlikely to be treated as an alternative solution. If there are no alternative solutions, then compensatory measures must be secured.
- 3.4.4.17 NPS EN-1 imposes no limit on the number of CNP infrastructure projects that can be consented (paragraph 4.2.21).
- 3.4.4.18 In terms of the requirements for infrastructure of a type to be considered CNP, paragraphs 4.2.10 to 4.2.12 confirm that applicants must continue to show how their application meets the requirements of the NPSs applying the mitigation hierarchy, as well as any other legal and regulatory requirements, that they should also seek the advice of the appropriate statutory nature conservation bodies (SNCB) or other relevant statutory body and demonstrate that all residual impacts are those that cannot be avoided, reduced or mitigated, setting out how any mitigation or compensatory measures will be monitored and reporting agreed to ensure success.
- 3.4.4.19 The exceptions to this presumption of consent are set out in NPS EN-1 paragraph 4.1.7. Whilst this paragraph reiterates that the need case will outweigh the residual effects in all but the most exceptional cases, it also states that those exceptions include residual impacts onshore and offshore which present an unacceptable risk to, or unacceptable interference with, human health and public safety, defence, irreplaceable habitats or unacceptable risk to the achievement of net zero and to unacceptable interference offshore to navigation, or onshore to flood and coastal erosion risk.
- 3.4.4.20 None of the above exceptions apply to the Transmission Assets which means that, as infrastructure of a type to be considered CNP, the Transmission Assets benefit from the presumption that the need outweighs any residual impacts.
- 3.4.4.21 In conclusion, therefore, NPS EN-1 confirms that *‘Government strongly supports the delivery of CNP Infrastructure...’* and that *‘...it should be progressed as quickly as possible’* (paragraph 3.3.63).

- 3.4.4.22 There is therefore a strong presumption in favour of consenting the Transmission Assets in accordance with NPS EN-1.
- 3.4.4.23 Of note, an NPS tracker (document reference J26) is submitted with this application and provides a detailed analysis of how the Transmission Assets application accords with the relevant NPSSs.

National Policy Statement for Renewable Energy Infrastructure (EN-3)

- 3.4.4.24 NPS EN-3 is the NPS for renewable energy infrastructure and sets out assessment principles in relation to the consideration of renewable projects.
- 3.4.4.25 The Transmission Assets, as mentioned in **section 2** and further explained in **section 5.25** would allow the connection to the National Grid of two offshore wind farms which are renewable energy projects. In this context, the Applicants consider that the Transmission Assets, on their own but also in connection with these two offshore wind farms, constitute a renewable energy infrastructure project for which NPS EN-3 applies.
- 3.4.4.26 Section 2 of NPS EN-3 contains the matters that need to be considered by applicants and the Secretary of State in the general assessment of energy infrastructure, as well as technology specific information. Of relevance to the Transmission Assets are:
- the relationship with English renewables policies;
 - the factors influencing site selection and design;
 - climate change adaptation;
 - consideration of good design for energy infrastructure;
 - flexibility in the project details; and
 - offshore wind.
- 3.4.4.27 NPS EN-3 outlines that offshore wind development and the supporting onshore and offshore transmission infrastructure are viewed by the Government as being CNP infrastructure and should be progressed as quickly as possible.
- 3.4.4.28 Paragraph 2.1.8 states that *‘Applicants must show how any likely significant negative effects would be avoided, reduced, mitigated and compensated for, following the mitigation hierarchy.’*
- 3.4.4.29 Paragraph 2.8.37 states that *‘Co-ordinated transmission proposals have principally been developed through, and as a consequence of, a process of ongoing reform including through strategic network planning, such as the Holistic Network Design for onshore-offshore transmission, as outlined in EN-5.’*
- 3.4.4.30 The impacts arising from the development of energy infrastructure are identified in Part 5 of NPS EN-1, and paragraphs 2.8.95 to 2.8.212 of NPS EN-3 and are not intended to be exhaustive.
- 3.4.4.31 When considering the impacts of energy infrastructure, paragraph 2.11.46 states that *‘Applicants must always employ the mitigation hierarchy, in particular to avoid as far as is possible the need to find compensatory*

measures for coastal, inshore and offshore developments affecting designated sites’.

- 3.4.4.32 Mitigation referred to in paragraph 2.8.214 of NPS EN-1 requires that *‘At the earliest possible stage, alternative ways of working and use of technology should be employed to avoid environmental impacts. For example, construction vessels may be rerouted to avoid disturbing seabirds. Where impacts cannot be avoided, measures to reduce and mitigate impacts should be employed, for example using trenching techniques or noise abatement technology’.*
- 3.4.4.33 Further, paragraph 2.8.55 of NPS EN-1 states that *‘Only once all feasible alternatives and mitigation measures have been employed, should applicants explore possible compensatory measures to make good any remaining significant adverse effects to site integrity’.*
- 3.4.4.34 Detailed assessment of compliance with relevant NPS paragraphs is presented in the submitted NPS tracker (document reference J26).

National Policy Statement for Electricity Networks Infrastructure (EN-5)

- 3.4.4.35 NPS EN-5 is the NPS that provides details of policy for electricity networks (including grid connections for wind farms) and sets out assessment principles in relation to the consideration of applications relating to electricity networks. In terms of offshore wind, this relates to substations, converter stations and other kinds of electricity infrastructure such as underground and subsea cables.
- 3.4.4.36 Section 2 of the NPS contains the matters that need to be considered by applicants and the Secretary of State in the general assessment of energy infrastructure, as well as technology specific information. These include:
- the factors influencing site selection and design;
 - climate change adaptation and resilience;
 - consideration of good design for energy infrastructure;
 - environmental and biodiversity net gain;
 - land rights and land interests;
 - holistic planning; and
 - strategic network planning.
- 3.4.4.37 Section 2.12 of NPS EN-5 relates entirely to the special assessment principles for offshore-onshore transmission. Paragraph 2.12.2 states that *‘the scale of offshore transmission infrastructure required to support the government’s 50GW offshore wind development ambition has significant implications for the onshore network’.* Paragraph 2.12.4 states that *‘it is important that the network planning for offshore transmission is much more closely co-ordinated with the planning and development of the onshore transmission network than previously. This includes all types of offshore transmission including interconnectors, multi-purpose interconnectors (MPI) and subsea ‘onshore’ transmission or ‘bootstraps’ reinforcing the onshore transmission network.’*

- 3.4.4.38 Paragraph 2.12.7 of NPS EN-5 relates to CNP infrastructure and reiterates the explanation in NPS EN-1 that electricity grid infrastructure comprises CNP infrastructure. This includes grid connections for nationally significant low carbon infrastructure but the NPS also notes that any new grid project will contribute towards *‘greater efficiency in constructing, operating and connecting low carbon infrastructure to the National Electricity Transmission System. This includes infrastructure identified in the Holistic Network Design and subsequent strategic network design exercises...’*.
- 3.4.4.39 In preparing applications for offshore-onshore transmission, section 2.13 of NPS EN-5 outlines that there should be consideration of strategic network design (including the outcomes of the HNDR) and that a coordinated approach to design should be adopted. Radial offshore transmission options to single windfarms should only be proposed where options assessment work identifies that a co-ordinated solution is not feasible. As set out in **section 1.2**, Morgan OWL and Morecambe OWL are working collaboratively to deliver the consent required for the Transmission Assets, which will provide a coordinated connection of two offshore wind farms to the National Grid, therefore this section of NPS EN-5 is relevant to the Transmission Assets and more detail and justification is provided on **section 4** and **section 6** of this Planning Statement.
- 3.4.4.40 In terms of the point of interconnection, NPS EN-5 (paragraph 2.2.1) highlights that the Secretary of State should *‘bear in mind that the initiating and terminating points – or development zone - of new electricity networks infrastructure is not substantially within the control of the applicant’* and paragraph 2.2.2 recognises that siting is determined by both the *‘location of new generating stations or other infrastructure requiring connection to the network’* and *‘system capacity and resilience requirements determined by the Electricity System Operator.’*
- 3.4.4.41 An assessment of compliance with the relevant paragraph of this NPS is included in the submitted NPS tracker (document reference J26).

3.4.5 Marine policy

UK Marine Policy Statement

- 3.4.5.1 Section 59 of the Marine and Coastal Access Act 2009 establishes the appropriate marine policy documents for the assessment of development proposals. For the Transmission Assets, the UK-wide Marine Policy Statement (MPS) (Defra, 2011) is the framework for preparing marine plans and taking decisions affecting the marine environment for the purposes of section 104 of the Planning Act 2008. The Marine and Coastal Access Act 2009 requires that all public authorities taking decisions regarding the marine area should do so in accordance with the MPS, unless relevant considerations indicate otherwise.
- 3.4.5.2 The MPS provides that the following issues should be taken into account by decision makers when examining and determining applications for energy infrastructure:

- *'The national level of need for energy infrastructure, as set out in NPS EN-1...*
- *The positive wider environmental, societal and economic benefits of low carbon electricity generation and carbon capture and storage as key technologies for reducing carbon dioxide emissions.*
- *The potential impact of inward investment in offshore wind, wave, tidal stream and tidal range energy related manufacturing and deployment activity; as well as the impact of associated employment opportunities on the regeneration of local and national economies. All of these activities support the objective of developing the UK's low carbon manufacturing capability' (MPS, paragraph 3.3.4).*

3.4.5.3 The MPS does acknowledge that renewable energy developments can potentially have adverse impacts on fish, mammals and birds and that further research is required to better understand potential impacts, however it goes on to state that:

'The UK has some of the best wind resources in the world and offshore wind will play an important and growing part in meeting our renewable energy and carbon emission targets and improving energy security by 2020, and afterwards towards 2050' (MPS, paragraph 3.3.19).

3.4.5.4 In addition, the MPS states that offshore wind:

'... has the potential to have the biggest impact in the medium-term on security of energy supply and carbon emission reductions through its commercial scale output' (MPS, paragraph 3.3.19).

3.4.5.5 Relevant policies of the UK Marine Policy Statement 2011 for the Transmission Assets are included and addressed in each of the relevant topic chapters of Volume 2 of the submitted ES (document reference F2) and an assessment of compliance with these is presented within Appendix 2 of this Planning Statement (document reference J28.2).

North West Inshore and North West Offshore Marine Plans 2021

3.4.5.6 The Transmission Assets are located within English offshore and inshore waters, covered by the North West Inshore and North West Offshore Marine Plan (HM Government, 2021b). This introduces a strategic approach to marine planning within the marine plan area. It is intended to inform decision-making by marine users and regulators on where, when or how activities may take place within the marine plan area.

3.4.5.7 The North West Inshore and North West Offshore Marine Plan sets out the following four objectives in relation to achieving a sustainable marine economy.

- Infrastructure is in place to support and promote safe, profitable and efficient marine businesses.
- The marine environment and its resources are used to maximise sustainable activity, prosperity and opportunities for all, now and in the future.

- Marine businesses are taking long-term strategic decisions and managing risks effectively. They are competitive and operating efficiently.
- Marine businesses are acting in a way which respects environmental limits and is socially responsible. This is rewarded in the market place. (North West Inshore and North West Offshore Marine Plan, paragraph 31, Table 1).

3.4.5.8 Relevant policies for the Transmission Assets are included and addressed in each of the relevant topic chapters in Volume 2 of the submitted ES (document reference F2) and an assessment of compliance with these is presented within **section 5** of this Planning Statement, alongside Appendix 2 of this Planning Statement (document reference J28.2).

3.4.6 National Planning Policy Framework

3.4.6.1 The National Planning Policy Framework (NPPF) (Ministry of Housing, Communities and Local Government, 2023) sets out the Government's planning policies for England and how these are to be applied. It was initially published in 2012 and has been updated several times, most recently in December 2023. There is currently a consultation related to proposed changes and updates to the NPPF, which will run until 24th September 2024. Given their early stage of consultation, these are considered to carry little weight in the decision-making process, therefore are not considered further.

3.4.6.2 Paragraph 5 states that the NPPF does not contain specific policies for nationally significant infrastructure projects as these are determined under the Planning Act 2008 (as amended) and relevant national policy statements for major infrastructure. However, consideration is also required for any other matters that are relevant, as set out in section 104(2) of the Planning Act 2008 (see **paragraph 3.4.1.8**) which may include the NPPF.

3.4.6.3 In this regard, Paragraph 8 sets the objective for developments to contribute to the achievement of sustainable development with Paragraph 11 setting a presumption in favour of sustainable development.

3.4.6.4 Of relevance to the Transmission Assets, Chapter 13 of the NPPF relates to the Green Belt. The proposed onshore substations and sections of the onshore export cable corridor would be located within the Warton to Kirkham Green Belt, and the 400 kV grid connection cable corridor would be located within the South Ribble Green Belt. Paragraph 152 of the NPPF establishes that *'inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances'*. Paragraph 156 identifies that when located in the Green Belt *'elements of many renewable energy projects will comprise inappropriate development'* which would require a demonstration of very special circumstances which *'may include the wider environmental benefits associated with increased production of energy from renewable sources'* (Paragraph 156 of the NPPF). As such, an assessment to demonstrate very special circumstances is contained in **section 5.24** of this Planning Statement.

3.4.6.5 Other relevant matters such as transport, flooding, climate change, natural and historic built environment are also covered by the NPPF, and a detailed

assessment of these relevant paragraphs is contained within the relevant ES topic chapters, **section 5** of this Planning Statement and Appendix 1 of this Planning Statement (document reference J28.1).

3.4.7 Local planning policy

3.4.7.1 As set out in **section 2.1** and shown in **Figure 3.1** the onshore elements of the Transmission Assets are located within the administrative areas of Blackpool Council, Fylde Council, Preston City Council, South Ribble Borough Council and Lancashire County Council.

3.4.7.2 A summary of the relevant policies for the Transmission Assets from the development plans of the above Councils is presented below. The relevant policies are included and addressed in each of the relevant topic chapters of the submitted ES. An assessment of compliance with these is presented within **section 5** of this Planning Statement and in Appendix 3 (document reference J28.3).

Blackpool Local Plan Part 1: Core Strategy

3.4.7.3 Blackpool Local Plan (Blackpool Council, 2016) sets out where new development (including housing, employment, retail and leisure) should be located to meet Blackpool's future needs to 2027. It was adopted by the Council on the 20 January 2016. It also identifies areas which will be regenerated, protected or enhanced and sets out the key development principles such as design and affordable housing.

3.4.7.4 The most relevant policies for the Transmission Assets are summarised in Table 3.1.

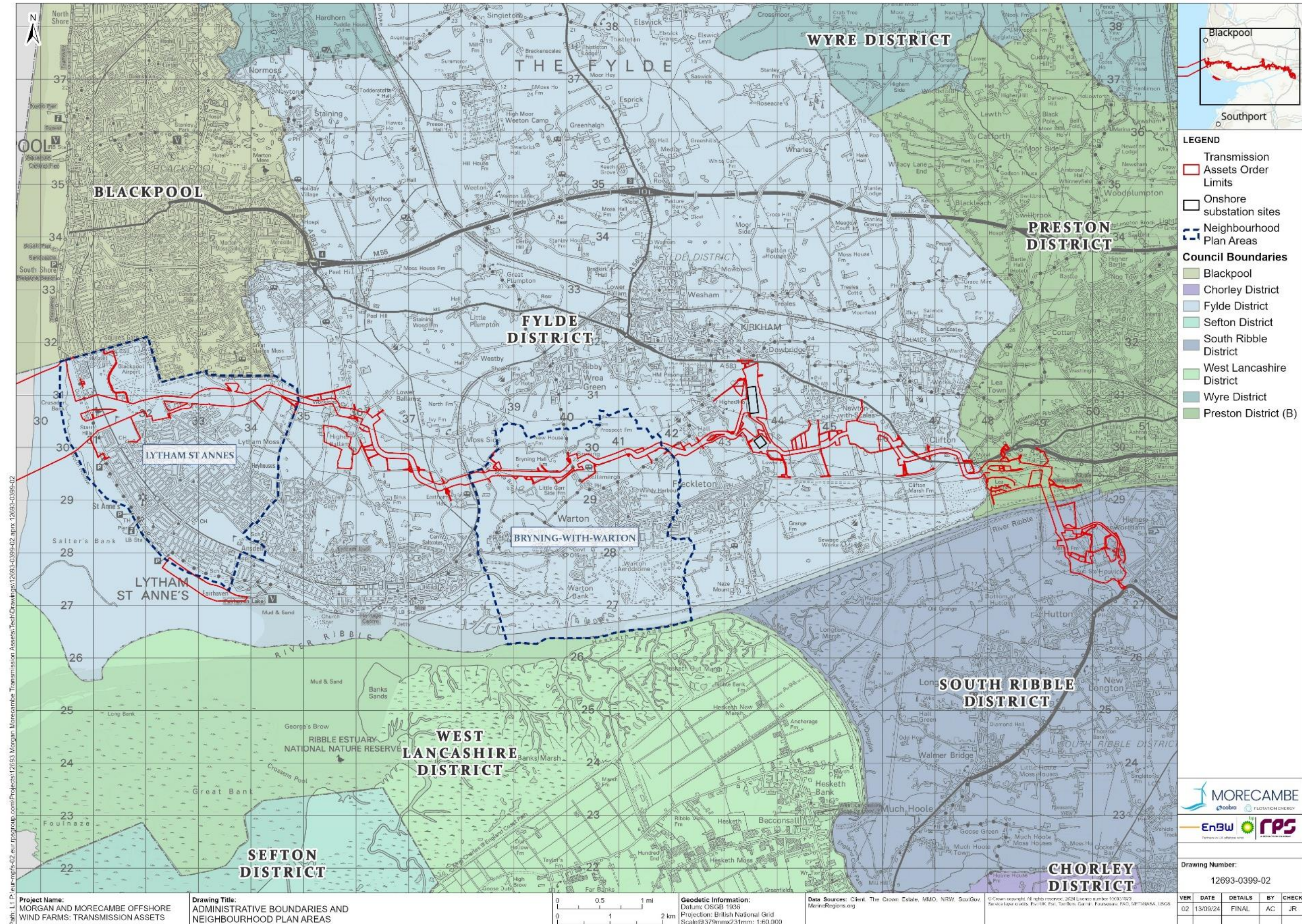


Figure 3.1: Administrative boundaries and neighbourhood plan areas

Table 3.1: Summary of relevant policies of Blackpool Local Plan Part 1: Core Strategy

Section/topic	Policy	Policy summary
Presumption In Favour of Sustainable Development	NPPF1	The Council will take a positive approach that reflects the presumption in favour of sustainable development contained in the NPPF.
Green Infrastructure	CS6	High-quality and well connected networks of green infrastructure in Blackpool will be achieved by protecting existing green infrastructure networks and existing areas of Green Belt. All development should incorporate new or enhance existing green infrastructure of an appropriate size, type and standard. International, national and local sites of biological and geological conservation importance will be protected having regard to the hierarchy of designated sites and the potential for appropriate mitigation. Measures that seek to preserve, restore and enhance local ecological networks and priority habitats/species will be required where necessary.
Quality of Design	CS7	New development in Blackpool is required to be well designed and enhance the character and appearance of the local area. Development will not be permitted that causes unacceptable effects by reason of visual intrusion, overlooking, shading, noise and light pollution or any other adverse local impact on local character or amenity.
Water Management	CS9	To reduce flood risk, manage the impacts of flooding and mitigate the effects of climate change, all new development must be directed away from areas at risk of flooding, through the application of the sequential test and where necessary the exception test, taking account of all sources of flooding. Incorporate appropriate mitigation and resilience measures to minimise the risk and impact of flooding from all sources. Incorporate appropriate Sustainable Drainage Systems (SuDS) where surface water run-off will be generated. Make efficient use of water resources, and not cause deterioration of water quality.
Sustainable Design and Renewable and Low Carbon Energy	CS10	To mitigate the impacts of climate change, minimise carbon emissions and ensure buildings are energy efficient, non-residential developments must follow the principle of the energy hierarchy. The development of renewable, low carbon, or decentralised energy schemes, excluding wind turbines, will be supported where proposals are located appropriately and do not cause an unacceptable impact on surrounding uses or the local environment, landscape character or visual appearance of the area, taking into account the cumulative impact of other energy generation schemes; and mitigate any potential noise, odour, traffic or other impacts of the development so as not to cause an unacceptable impact on the environment or local amenity.
Planning Obligations	CS11	Development will only be permitted where existing infrastructure, services and amenities are already sufficient, or where the developer enters into a legal undertaking or agreement to meet the additional needs arising from the development. Where appropriate, planning contributions will be sought in connection with a development to ensure that: 1. the particular facilities required for the proposed development, including the provision of necessary infrastructure, services and community facilities are met; and 2. any damaging impact on the environment or local amenity arising from the proposed development can be overcome.

Blackpool Local Plan Part 2: Site Allocations and Development Management Policies

- 3.4.7.5 Blackpool Local Plan Part 2 (Blackpool, Council, 2023) allocates sites for development, safeguarding or protecting and sets out a suite of development management policies to guide appropriate development. It was adopted by the Council on 22 February 2023 and, along with the Core Strategy (Part 1), replaces all the policies in the previous Blackpool Local Plan 2001-2016.
- 3.4.7.6 The most relevant policies for the Transmission Assets are summarised in **Table 3.2**.

Table 3.2: Summary of relevant policies of Blackpool Local Plan Part 2

Section/topic	Policy	Policy summary
Blackpool Airport Enterprise Zone	DM8	The overall delivery of the Enterprise Zone is guided by a masterplan, informed by local plan policy and establishing the development and design framework for the site determining the appropriate mix, quantum and location of development including landscaping, green infrastructure and biodiversity net gain to deliver the objectives of the Enterprise Zone. The following uses will be supported: energy industry, advanced manufacturing and engineering, aviation and aerospace, food and drink manufacture and the digital and creative sector.
Design Principles	DM17	All development should be of a high quality and should enhance and respond to any positive character of the local area to create well designed, attractive and distinctive neighbourhoods in Blackpool.
Surface water management	DM31	Surface water from development sites will be discharged via the most sustainable drainage option available. The discharge of surface water should be in line with the following order of priority, in accordance with Planning Practice Guidance
Biodiversity	DM35	Development proposals will be required to result in no loss or harm to biodiversity through avoidance, adequate mitigation either on site or off site or, as a last resort, compensatory measures secured through the establishment of a legally binding agreements.
Coast and Foreshore	DM33	Development proposals will be supported which secure further improvements to bathing water quality or flood protection. Development proposals that would adversely affect the appearance, integrity or environmental quality of the beach and foreshore will be resisted. The Coast and Foreshore is identified on the Policies Map.
Controlling pollution and contamination	DM36	Development will be permitted where in isolation or in conjunction with other planned or committed developments it can be demonstrated that the development will be compatible with adjacent existing uses and would not lead to unacceptable adverse effects on health, amenity, safety and the operation of surrounding uses and for occupants, users of the development itself or designated sites of importance for biodiversity, with reference to noise, vibration, odour, light, dust, other pollution or nuisance. Applications will be required to be accompanied, where appropriate, by relevant impact assessments and mitigation proposals.
Transport requirements for new development	DM41	New development will only be permitted where the access, travel and safety needs of all affected by the development are met. Transport Assessments and Travel Plans will be required having regard to the thresholds set out in Appendix G2 of the Local Plan.

Section/topic	Policy	Policy summary
Aerodrome safeguarding	DM42	The Blackpool Airport Authority and the Ministry of Defence (MoD) will be consulted on all development proposals as appropriate within the aerodrome safeguarding area/zones shown on the Policies Map to ensure there is no adverse impact on airport safety at Blackpool Airport or Warton Aerodrome.

Fylde Local Plan to 2032 (incorporating Partial Review)

- 3.4.7.7 The Fylde Local Plan to 2032 (Fylde Council, 2021) covers the entire borough and outlines planning policies for the period from 2011 to 2032. The plan serves as a guide for decision-making on planning applications, infrastructure development, and environmental protection. Since its adoption, there has been a Partial Review incorporated into the plan. The most recent version, which includes the Partial Review, was adopted in December 2021.
- 3.4.7.8 A summary of the most relevant planning policies for the Transmission Assets is presented in **Table 3.3**.

Table 3.3: Summary of relevant policies of Fylde Local Plan to 2032 (incorporating Partial Review)

Section/topic	Policy	Policy summary
Non- Strategic Policy	GD1	The boundaries of settlements in Fylde are shown on the Policies Map. Development proposals outside settlement boundaries will be in accordance with Policies GD2, GD3, GD4 and/or GD5 as applicable.
Green Belt	GD2	The Green Belt within Fylde is shown on the Policies Map. Within that area national policy for development in the Green Belt will be applied.
Areas of Separation	GD3	Areas of Separation shown on the Policies Map are designated between Kirkham and Newton; and Wrea Green and Kirkham. Development will be assessed in terms of its impact upon the Area(s) of Separation, including any harm to the to the effectiveness of the gap between the settlements and the degree to which the development proposed would compromise the function of the Area(s) of Separation in protecting the identity and distinctiveness of settlements.
Development in the Countryside	GD4	Development in the Countryside will be permitted where it is needed for the purposes of meeting local business and community needs; agriculture, horticulture or forestry; or other uses appropriate to a rural area, including uses which would help to diversify the rural economy. The development must be sensitive to its surroundings, must not have an unacceptable impact on local roads and should offer opportunities to make the location more sustainable.
Achieving Good Design in Development	GD7	Development will be expected to be of a high standard of design, taking account of the character and appearance of the local area.
Contaminated Land	GD9	Applicants will be required to provide evidence of a satisfactory site investigation and show that any proposed remedial works are adequate to deal with any identified hazards, including the risk to human health and controlled waters from land contamination. Any remedial work should be undertaken to the satisfaction of the local authority, ahead of the commencement of development.

Section/topic	Policy	Policy summary
Strategic Highway Improvements	T1	Land within Fylde Borough is proposed for part of the route of the Preston Western Distributor Road which will link up to a new Junction 2 on the M55, and the Cottam Link Road. Planning permission will not be granted for any development in Fylde that would prejudice the construction of these roads.
Blackpool Airport	T3	The land designated as Green Belt within the airport will be safeguarded from non-airport related development and the continuing operation and viability of the airport as a sub-regional facility will be supported, unless there are overriding operational requirements that constitute very special circumstances and which justify development in the Green Belt.
Enhancing Sustainable Transport Choice	T4	All planning applications for developments that generate significant amounts of movement should be supported by a Transport Statement or Transport Assessment, prepared in accordance with the Planning Practice Guidance. Any mitigation identified in the Transport Assessment or Transport Statement that is required to make the development acceptable must be implemented in accordance with the requirements of the Highway Authority.
Parking Standards	T5	Car parking should, wherever possible, be provided on site so as to ensure there is no detrimental effect on highway safety. A flexible approach to the level of car parking provision will be applied, dependent on the location of the development concerned.
Flood Alleviation, Water Quality and Water Efficiency	CL1	Planning decisions should follow the sequential, risk-based approach to the location of development, as required by the Framework. All new development is required to minimise flood risk impacts on the environment, retain water quality and water efficiency, and mitigate against the likely effects of climate change on present and future generations.
Surface Water Run-Off and Sustainable Drainage	CL2	New development must follow a sequential approach to attenuation measures and utilise SuDS whenever practical. Development should reduce discharge to greenfield run-off rates wherever feasible.
Strategic Policies	DLF1	Development will not be permitted which would prevent or undermine the operation of existing land uses, including hazardous installations and the ethylene pipeline and Mineral Safeguarding Areas, or prejudice airport safety at Blackpool Airport or at Warton Aerodrome. Development will contribute towards sustainable growth, the continuation and creation of sustainable communities, by their locations and accessibility and through the sustainable use of resources and construction materials.
Landscape	ENV1	Development will have regard to its visual impact within its landscape context and the landscape type in which it is situated. Development will be assessed to consider whether it is appropriate to the landscape character, amenity and tranquillity within which it is situated, as identified in the Lancashire Landscape Character Assessment, December 2000 or any subsequent update. Development proposals will ensure that existing landscape features will be conserved, maintained, protected and wherever possible enhanced. Where such features, including trees, woodlands, hedgerows and field ponds, are lost and replaced, measures will be put in place to manage these new features.

Section/topic	Policy	Policy summary
Coastal Change Management Access	ENV1	The open and coastal character of the Coastal Change Management Areas will be protected.
Biodiversity	ENV2	The Council is committed to ensuring the protection and enhancement of Fylde's biodiversity and geological assets and interests. Development that would directly or indirectly affect any sites of local importance will be permitted only where it is necessary to meet an overriding local public need or where it is in relation to the purposes of the nature conservation site. Where development is considered necessary, adequate mitigation measures and compensatory habitat creation will be required through planning conditions and/or obligations, in order to secure measurable net gains for biodiversity. Where it has been demonstrated that significant harm cannot be avoided appropriate mitigation or, as a last resort, replacement or other compensation will be required. The location of appropriate mitigation, replacement or other compensation will be targeted, using a sequential approach.
Historic Environment	ENV5	Proposals for development should conserve, protect and, where appropriate, enhance the character, appearance, significance, and historic value of Fylde's designated and undesignated heritage assets. Development which would result in harm to the significance of a scheduled monument or other nationally important archaeological sites will not be permitted unless it can be demonstrated that the public benefits which cannot be met in any other way would clearly outweigh the harm.

Saint Anne's on the Sea Neighbourhood Development Plan 2016 – 2031

- 3.4.7.9 Saint Anne's Neighbourhood Development Plan (St. Anne's Town Council, 2016) sets out a positive vision for the future of St. Anne's, ensuring that it reflects the aspirations of its residents, who will be involved in making the plan, monitoring its progress and delivering development. The plan was adopted in May 2017 and contains a number of policies relevant to the Transmission Assets, as summarised in **Table 3.4**.

Table 3.4: Summary of relevant policies of Saint Anne's on the Sea Neighbourhood Development Plan

Section/topic	Policy	Policy summary
Settlement Boundary	GP1	Development will be directed towards the existing settlement and, within the settlement boundary, development on previously developed land will be encouraged, subject to other relevant development plan policies being satisfied. Development outside the settlement boundary will be assessed against national policy (including that related to development on previously developed land) and any relevant development plan policies.
Sites of biological and geological importance	EN1	Development likely to result in the loss, deterioration or harm to habitats, species or features of importance to biodiversity or geological conservation interests, either directly or indirectly, will not be permitted unless the need for, and benefits of, the development in the proposed location outweighs the adverse effect on the relevant biodiversity interest; it can be demonstrated that it could not reasonably be located on an alternative site that would result in less or no harm to the biodiversity interests, and measures can be provided (and secured through planning conditions or legal agreements), that would avoid,

Section/topic	Policy	Policy summary
		mitigate against or, as a last resort, compensate for the adverse effects likely to result from development. The level of protection and mitigation should be proportionate to the status of the habitat or species and should give appropriate weight to their importance, individually and as part of the contribution they make to the wider ecological network. Development that is likely to result in a significant effect, either alone or in combination, on an international or European nature conservation designation, or a site proposed for such designation, will need to satisfy the requirements of the Habitat Regulations.

Bryning with Warton Neighbourhood Development Plan 2011 – 2032

- 3.4.7.10 The Neighbourhood Plan (Bryning with Warton Neighbourhood Plan Steering Group, 2017) provides a vision for the future of the community and sets out clear planning policies to realise this vision. The plan was adopted in May 2017 and contains a number of policies relevant to the Transmission Assets, as summarised in **Table 3.5**.

Table 3.5: Summary of relevant policies of Bryning with Warton Neighbourhood Development Plan 2011 – 2032

Section/topic	Policy	Policy summary
Protecting and enhancing local wildlife and habitats	BWNE1	Development proposals that impact on local wildlife and habitats should demonstrate how biodiversity will be protected and enhanced. Development should retain and where possible, enhance existing coastal features, watercourses, wetlands, ponds, native trees and hedgerows. The creation of new habitats, new linkages between open spaces and habitats and for improvements to the existing public rights of way network will be supported.
Protecting and enhancing local character and landscape	BWNE2	Development proposals should demonstrate good design, respect local character and where possible, reinforce local distinctiveness.
Design to reduce surface water run off	BWNE3	The provision of SuDS will be supported. Where appropriate the design of new buildings and infrastructure should take account of existing topography to manage the flow of water along specific flow routes away from property and into appropriate storage facilities; and water attenuation facilities such as lagoons, ponds and swales should be provided.

Preston Local Plan 2012-2026

- 3.4.7.11 The Preston Local Plan (Preston City Council, 2015) was adopted in July 2015 and covers the period from 2012 to 2026. It identifies the scale of development and allocates sites to meet the development needs of Preston, in line with the vision for growth outlined in the Central Lancashire Core Strategy. It also addresses key local issues and provides a set of policies to manage change. Together with the Central Lancashire Core Strategy (Preston City Council, *et al.*, 2012), the Preston Local Plan forms the development plan for all parts of the city except the City Centre (which is covered by the City Centre Area Action Plan).

3.4.7.12 A summary of the relevant policies of the Preston Local Plan is presented in **Table 3.6**.

Table 3.6: Summary of relevant policies of Preston Local Plan

Section/topic	Policy	Policy summary
Model Policy	Policy V1	The Council will take a positive approach that reflects the presumption in favour of sustainable development contained in the Framework. The Council will always work proactively with applicants jointly to find solutions which mean that proposals can be approved wherever possible, and to secure development that improves the economic, social and environmental conditions in the area. Planning applications that accord with the policies in this Local Plan (and where relevant, policies in neighbourhood plans) will be approved without delay, unless material considerations indicate otherwise.
Parking Standards	ST1	All development proposals will provide car parking and servicing space in accordance with the Parking Standards adopted by the Council (Appendix B). Locations that are accessible to services and well served by public transport may be considered appropriate for lower levels of provision. Proposals for provision above the adopted standards will need to be supported by evidence detailing the local circumstances that justify deviation from the standard.
General Transport Considerations	ST2	All development proposals will need to show the following: - Road safety and the efficient and convenient movement of all highway users (including bus passengers, cyclists, pedestrians and equestrians) is not prejudiced. - Where practicable, ensure existing pedestrian, cycle and equestrian routes are protected and extended
Development in the Open Countryside	EN1	Development in the Open Countryside, as shown on the Policies Map, other than that permissible under policies HS4 and HS5, will be limited to: - that needed for purposes of agriculture or forestry or other uses appropriate to a rural area including uses which help to diversify the rural economy; - the re-use or re-habitation of existing buildings; and - infilling within groups of buildings in smaller rural settlements.
Protection and enhancement of Green Infrastructure	EN2	Development proposals should seek to protect and enhance existing green infrastructure as identified on the Policies Map. Proposals which would involve the loss of green infrastructure will only be granted planning permission where it can be clearly shown that the site is surplus to requirements.
Land Quality	EN7	New development should demonstrate that any existing contamination of the land will be addressed by appropriate mitigation measures to ensure that the site is suitable for the proposed use and that there is no unacceptable risk of pollution within the site or in the surrounding area; and the proposed development will not cause the land to become contaminated, to the detriment of future use or restoration of the site or so that it would cause pollution in the surrounding area.
Design of New Development	EN9	All new development proposals, including extensions to existing buildings, should be designed with regard to the principles as set out and explained in the Central Lancashire Design Guide SPD. Applications will be approved where they: accord with the principles and

Section/topic	Policy	Policy summary
		guidance set in the Design SPD, the relevant policies in the Core Strategy, national policy on the historic environment and the relevant Design Council Cabe guidance; and take the opportunity to make a positive contribution to the character and local distinctiveness of the area through high quality new design that responds to its context; and, are accompanied by a satisfactory Design and Access Statement that fully explains and justifies the design approach for the scheme.
Biodiversity and Nature Conservation	EN10	Biodiversity and Ecological Network resources will be protected, conserved, restored and enhanced. The production of a net gain in biodiversity is required where possible by designing in wildlife and by ensuring that any adverse impacts are avoided or if unavoidable are reduced or appropriately mitigated and/or compensated. In exceptional cases, where the need for development in social or economic terms is considered to significantly outweigh the impact on the natural environment, appropriate and proportionate mitigation measures and/ or compensatory habitat creation and/or restoration of at least equal area, quality and diversity will be required through planning conditions and/or planning obligations.
Species Protection	EN11	Planning permission will not be granted for development which would have an adverse effect on a protected species unless the benefits of the development outweigh the need to maintain the population of the species in situ.

South Ribble Local Plan 2015

- 3.4.7.13 South Ribble Local Plan (South Ribble Borough Council, 2015) was adopted in July 2015 and plays a crucial role in shaping the future development of the South Ribble area in Lancashire. It identifies and allocates land required over a 15-year period to achieve various goals. It aims to create vibrant communities by strategically allocating land for housing, employment, natural environment and local services.
- 3.4.7.14 A summary of the relevant policies from the South Ribble Local Plan 2015 relevant to the Transmission Assets is presented in **Table 3.7**.

Table 3.7: Summary of relevant policies of South Ribble Local Plan

Section/topic	Policy	Policy summary
Developer Contributions	A1	New development will be expected to contribute to mitigating its impact on infrastructure, services and the environment and to contribute to the requirements of the community. This may be secured as a planning obligation through a section 106 agreement, where the development would otherwise be unacceptable and through the Community Infrastructure Levy by way of a Charging Schedule.
Parking Standards	F1	All development proposals will be required to provide car parking and servicing space in accordance with the parking standards adopted by the Council. The parking standards should be seen as a guide for developers and any variation from these standards should be supported by local evidence in the form of a transport statement. Where appropriate, some flexibility will be factored into the standards in relation to the specific local circumstances.
Green Belt	G1	The area covered by Green Belt is shown on the Policies Map. As set out in the NPPF, planning permission will not be given for the

Section/topic	Policy	Policy summary
		construction of new buildings unless there are very special circumstances.
Protected Open Land	G4	Protected Open Land is shown on the Policies Map. There is a presumption against inappropriate development on Protected Open Land. Planning permission will only be permitted where: a. it is required for the purposes of agriculture; b. uses are appropriate to a rural area; or c. it involves the re-use of existing buildings.
Green Infrastructure - Existing Provision	G7	Development proposals should seek to protect and enhance the existing Green Infrastructure. Development which would involve the loss of Green Infrastructure will not be permitted unless alternative provision of similar and/or better facilities for the community will be implemented on another site or within the locality; or it can be demonstrated that the retention of the site is not required to satisfy a recreational need in the local area; and the development would not detrimentally affect the amenity value and the nature conservation value of the site.
Green Infrastructure – Future Provisions	G8	All developments should provide appropriate landscape enhancements; Conservation of important environmental assets, natural resources, biodiversity and geodiversity; For the long-term use and management of these areas; and Access to well-designed cycleways, bridleways and footways (both off and on road), to help link local services and facilities.
Trees, Woodlands and Development	G13	a) Planning permission will not be permitted where the proposal adversely affects trees, woodlands and hedgerows which are Protected by a Tree Preservation Order (TPO); Ancient Woodlands including individual ancient and veteran trees and those defined in Natural England's inventory of ancient woodlands; In a Conservation Area; or Within a recognised Nature Conservation Site. Where there is an unavoidable loss of trees on site, replacement trees will be required to be planted on site where appropriate at a rate of two new trees for each tree lost.
Unstable or Contaminated Land	G14	There will be a presumption in favour of the redevelopment of previously developed land. Previously developed land can be unstable and subject to contamination. However, development will be encouraged on unstable or contaminated brownfield land subject to applicants providing evidence of a satisfactory site investigation that shows that any proposed remedial works are adequate to deal with any identified hazards. Development should not have an adverse impact on the stability of surrounding areas.
Biodiversity and Nature Conservation	G16	The borough's Biodiversity and Ecological Network resources will be protected, conserved and enhanced. The level of protection will be commensurate with the site's status and proposals will be assessed having regard to the site's importance and the contribution it makes to wider ecological networks
Design Criteria for New Development	G17	Planning permission will be granted for new development, including extensions and free standing structures, provided that the proposal does not have a detrimental impact on the existing building, neighbouring buildings or on the street scene by virtue of its design, height, scale, orientation, plot density, massing, proximity, or use of materials. Developments should not cause harm to neighbouring property by leading to undue overlooking, overshadowing or have an overbearing effect. The development would not prejudice highway safety, pedestrian safety,

Section/topic	Policy	Policy summary
		the free flow of traffic, and would not reduce the number of on-site parking spaces to below the standards stated in Policy F1, unless there are other material considerations which justify the reduction. Furthermore, any new roads and/or pavements provided as part of the development should be to an adoptable standard. The proposal would not have a detrimental impact on landscape features such as mature trees, hedgerows, ponds and watercourses. In some circumstances where, on balance, it is considered acceptable to remove one or more of these features, then mitigation measures to replace the feature/s will be required either on or off-site.

Penwortham Town Neighbourhood Development Plan 2016 -2026

- 3.4.7.15 The Penwortham Town Neighbourhood Development Plan 2016 - 2026 (Penwortham Town Steering Committee, 2017) sets the local strategy for development of Penwortham until 2026 and although its emphasis is mostly on residential development and the protection of heritage assets, there are also policies regarding wider infrastructure projects, which are relevant to the Transmission Assets.
- 3.4.7.16 A summary of the relevant policy of Penwortham Town Neighbourhood Development Plan is presented in **Table 3.8** below.

Table 3.8: Summary of relevant policies of Penwortham Town Neighbourhood Development Plan

Section/topic	Policy	Policy summary
Penwortham Cycle and Walking Route	7	The route shown on the plan below will be safeguarded for a dedicated circular route for cyclists and walkers. Proposals for development within the Neighbourhood Area that would prejudice the delivery of the route will be resisted.

Central Lancashire Adopted Core Strategy

- 3.4.7.17 The Central Lancashire Core Strategy (Preston City Council *et al.*, 2012) is a key document within the Central Lancashire Local Development Framework. It was prepared jointly by Preston City Council, Chorley Council and South Ribble Council, and was adopted in July 2012.
- 3.4.7.18 The Core Strategy sets the overall strategic direction for planning in the Central Lancashire area over the period 2010 to 2026, aligning with national policies. Its primary goals are to co-ordinate development, boost investment, and enhance employment opportunities.
- 3.4.7.19 The strategy emphasises sustainable managed growth while preserving and enhancing green spaces and access to open countryside.
- 3.4.7.20 A summary of the relevant policies of the Central Lancashire Core Strategy is presented in **Table 3.9**.

Table 3.9: Summary of relevant policies of Central Lancashire Core Strategy

Section/topic	Policy	Policy summary
Presumption in Favour of Sustainable Development	MP	When considering development proposals the Council will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework. It will always work proactively with applicants jointly to find solutions which mean that proposals can be approved wherever possible, and to secure development that improves the economic, social and environmental conditions in the area. Planning applications that accord with the policies in this Local Plan (and, where relevant with policies in the neighbourhood plans) will be approved without delay, unless material considerations indicate otherwise.
Heritage Assets	16	Protect and seek opportunities to enhance the historic environment, heritage assets and their settings by safeguarding heritage assets from inappropriate development that would cause harm to their significance; supporting development or other initiatives where they protect and enhance the local character, setting, management and historic significance of heritage assets and identifying and adopting a local list of heritage assets for each Authority.
Green Infrastructure	18	Manage and improve environmental resources through a Green Infrastructure approach to protect and enhance the natural environment where it already provides economic, social and environmental benefits; invest in and improve the natural environment and secure mitigation and/or compensatory measures where development would lead to the loss of, or damage to, part of the Green Infrastructure network.
Landscape Character Areas	21	New Development will be required to be well integrated into existing settlement patterns, appropriate to the landscape character type and designation within which it is situated and contribute positively to its conservation, enhancement or restoration or the creation of appropriate new features.
Biodiversity and Geodiversity	22	Conserve, protect and seek opportunities to enhance and manage the biological and geological assets of the area by promoting the conservation and enhancement of biological diversity, having particular regard to the favourable condition, restoration and re-establishment of priority habitats and species populations; seeking opportunities to conserve, enhance and expand ecological networks and safeguard geological assets that are of strategic and local importance.
Renewable and Low Carbon Energy Schemes	28	Proposals for renewable and low carbon energy schemes will be supported and planning permission granted where the proposal would not have an unacceptable impact on landscape character and visual appearance of the local area, including the urban environment; the reason for the designation of a site with statutory protection would not be compromised by the development; any noise, odour, traffic or other impact of development is mitigated so as not to cause unacceptable detriment to local amenity and any significant adverse effects of the proposal are considered against the wider environmental, social and economic benefits, including scope for appropriate mitigation, adaptation and/or compensatory provisions.
Water Management	29	Improve water quality, water management and reduce the risk of flooding
Air Quality	30	Improve air quality through delivery of Green Infrastructure initiatives and through taking account of air quality when prioritising measures to reduce road traffic congestion.

Section/topic	Policy	Policy summary
Agricultural Land	31	Protect the best and most versatile agricultural land, (Grades 1, 2 and 3a) that occurs in the west of Central Lancashire when considering both agricultural and other forms of development to avoid irreversible damage to, and instead achieve the full potential, of the soil.

Joint Lancashire Minerals and Waste Development Framework Core Strategy

- 3.4.7.21 The Joint Lancashire Minerals and Waste Development Framework Core Strategy (DPD) (Blackpool Council *et al.*, 2009) was adopted in February 2009 and it is a strategic document that guides minerals and waste development in Blackpool, Blackburn with Darwen and Lancashire.
- 3.4.7.22 The DPD aims to reduce the impact of mineral development by promoting sustainable practices. It encourages prudent use of resources, including alternatives to primary aggregates and emphasizes sustainable transport of minerals.
- 3.4.7.23 A summary of the relevant policies for the Transmission Assets is presented in **Table 3.10**.

Table 3.10: Summary of relevant policies of the Joint Lancashire Minerals and Waster Core Strategy DPD

Section/topic	Policy	Policy summary
Minimising the need for Mineral Extraction	CS2	All new developments will be expected to maximise the use of recycled and secondary materials by including measures to reduce, reuse, recycle and recover the waste they produce during construction and demolition, where possible on-site; maximise the use of recycled and secondary materials, and the reuse of other building materials, within the development; and maximise the potential for recovering and recycling construction materials at the end of the development's life, through the design of, and specification of materials used in, the development.

Lancashire County Council Local Flood Risk Management Strategy for Lancashire 2021-2027

- 3.4.7.24 The Lancashire County Council Local Flood Risk Management Strategy (Blackpool Council, Blackburn with Darwen Council and Lancashire County Council, 2021) provides the principles for flood risk management for Lancashire. It includes the way flood risk will be managed and mitigated at a regional level and how these measures will be monitored.
- 3.4.7.25 A summary of the relevant policies for Transmission Assets is presented in **Table 3.11** below.

Table 3.11: Summary of relevant policies of Lancashire County Council Local Flood Risk Management Strategy

Section/topic	Policy	Policy summary
Supporting Sustainable Flood Resilient Development	Theme 3	The Lead Local Flood Authority (LLFA) will ensure that guiding principles for sustainable development are applied, and inappropriate development is avoided in existing and future areas at risk of local flooding. The use of high-quality sustainable drainage systems which meet industry standards and ensure appropriate maintenance arrangements will be encouraged, to also enhance biodiversity and add amenity value to development in line with national and local planning requirements.

Joint Lancashire Minerals and Waste Local Plan: Site Allocation and Development Management Policies

- 3.4.7.26 The Joint Lancashire Minerals and Waste site allocations document (Blackpool Council *et al.*, 2013) was adopted in September 2013 and provides site-specific policies, allocations, and detailed development management policies for minerals and waste planning for Lancashire, Blackpool and Blackburn with Darwen. It addresses both site allocations and development control policies.
- 3.4.7.27 A summary of the relevant policies for Transmission Assets is presented in **Table 3.12**.

Table 3.12: Summary of relevant policies of Joint Lancashire Minerals and Waste Local Plan: Site allocation and Development Management Policies

Section/topic	Policy	Policy summary
Safeguarding Minerals	M2	Within the Plan area, Mineral Safeguarding Areas have been delineated on the Policies Map around all deposits of Limestone, Sand and Gravel, Gritstone (Sandstone); Shallow Coal, Brickshales and Salt. Within these mineral safeguarding areas identified, planning permission will not be supported for any form of development that is incompatible by reason of scale, proximity and permanence with working the minerals, unless the applicant can demonstrate to the satisfaction of the local planning authority that: - The mineral concerned is no longer of any value or has been fully extracted. - The full extent of the mineral can be extracted satisfactorily prior to the incompatible development taking place. - The incompatible development is of a temporary nature and can be completed and the site returned to its original condition prior to the minerals being worked. - There is an overarching need for the incompatible development that outweighs the need to avoid the sterilisation of the mineral resource. - That prior extraction of minerals is not feasible due to the depth of the deposit. Extraction would lead to land stability problems.

4 Need for the Transmission Assets

4.1 Overview

- 4.1.1.1 As set out in **section 2.2**, the Transmission Assets are required to connect the Generation Assets (the Morgan Offshore Wind Project and the Morecambe Offshore Windfarm) to the UK electricity transmission network, contributing promptly to:
- the UK Government's ambition to deliver 50 GW of offshore wind by 2030;
 - delivering much needed investment and securing construction and operations jobs in the UK;
 - securing our energy supply; and
 - the UK's response to the climate change crisis.
- 4.1.1.2 The Generation Assets, together with the Transmission Assets, therefore have an important part to play in securing the timely delivery of the Government's renewable energy strategy and achieving legally binding greenhouse gas emissions reduction targets.
- 4.1.1.3 The national and international policy commitments described in **section 3** demonstrate the need for renewable energy and, specifically, for offshore wind and electricity network improvements, in order to meet climate commitments and contribute to addressing the climate crisis.
- 4.1.1.4 The Transmission Assets are development for which development consent is required by virtue of the section 35 direction. On this basis, the Applicants are of the position that NPS EN-1 paragraph 1.3.10 applies to the Transmission Assets. This paragraph defines that *'EN-1, in conjunction with any relevant technology specific NPS, will be the primary policy for Secretary of State decision making on projects in the field of energy for which a direction has been given under section 35'*.
- 4.1.1.5 The NPSs establish the policy need for new renewable energy generation and transmission infrastructure. The key drivers underpinning the need for renewable energy and transmission infrastructure within the UK, and the reasons for the urgent need for new low carbon generation and transmission projects are discussed throughout this section, with the NPSs in particular considered further in **section 5**.

4.2 The need for new nationally significant energy infrastructure projects

- 4.2.1.1 NPS EN-1 provides the overarching policy for energy infrastructure as presented in **section 3**. This includes offshore wind and transmission infrastructure. Paragraphs 1.3.8 to 1.3.12 of NPS EN-1 relate to projects subject to a section 35 direction from the Secretary of State. Paragraph 1.3.10 states that NPS EN-1, in conjunction with other relevant technology-specific NPSs, will be the primary policy for Secretary of State decision-

making on projects in the field of energy for which a direction has been given under section 35 (as is the case for the Transmission Assets).

- 4.2.1.2 Part 3 of NPS EN-1 outlines the urgent need for energy and transmission infrastructure in order to achieve energy security and dramatically reduce greenhouse gas (GHG) emissions (paragraphs 3.1.1, 3.3.62 and 3.3.63).
- 4.2.1.3 Paragraph 3.2.6 of NPS EN-1 states that:
‘The Secretary of State should assess all applications for development consent for the types of infrastructure covered by this NPS on the basis that the government has demonstrated that there is a need for those types of infrastructure which is urgent...’ (paragraph 3.2.6, NPS EN-1).
- 4.2.1.4 Paragraph 3.2.7 states that substantial weight should be given to the contribution such projects would make towards satisfying this need. In addition, paragraph 3.2.8 confirms that, when determining applications for national infrastructure, the Secretary of State is not required to consider separately the specific contribution of any individual project to satisfying the need established in the NPS.
- 4.2.1.5 As set out in **section 3.4.4**, the NPS also includes a strengthened presumption specifically in relation to CNP infrastructure. Paragraphs 3.3.62 and 4.2.4 of NPS EN-1 confirm that the Government *‘... has concluded that there is a critical national priority for the provision of nationally significant low carbon infrastructure.’*
- 4.2.1.6 The Transmission Assets are considered to benefit from the presumptions given to CNP for low carbon infrastructure, as set out in paragraph 4.2.4 of NPS EN-1. Paragraph 4.2.5 of NPS EN-1 confirms that energy transmission projects directed to be considered under the Planning Act 2008 under a section 35 direction and which fit within the normal definition of ‘low carbon’ (as is the case for the Transmission Assets) are of a type to be considered CNP infrastructure.
- 4.2.1.7 In terms of determining applications for CNP infrastructure, paragraphs 4.2.15 to 4.2.17 of NPS EN-1 relate to residual impacts of CNP infrastructure. Paragraph 4.6.16 confirms that the starting point for decision-making is that CNP infrastructure is to be treated as if it has met any tests which are set out within the NPSs, or any other planning policy, which requires a clear outweighing of harm, exceptionality, or very special circumstances. This includes development within Green Belt, development affecting SSSIs, development in nationally designated landscapes and where there is substantial harm to or loss of significance to heritage assets (paragraph 4.2.17).
- 4.2.1.8 The strengthened presumptions in favour of CNP infrastructure include that even *‘where non-HRA or non-MCZ impacts remain after the mitigation hierarchy has been applied, these residual impacts are unlikely to outweigh the urgent need for this type of infrastructure’* (paragraph 4.2.15). The paragraph then goes on to confirm that *‘... in all but the most exceptional circumstances, it is unlikely that consent will be refused on the basis of these residual impacts.’*

- 4.2.1.9 Similarly, in terms of any HRA or MCZ residual impacts, paragraphs 4.2.18 to 4.2.22 confirm that the starting point is that energy security and decarbonising the power sector to combat climate change are capable of amounting to imperative reasons of overriding public interest with the benefit to the public being capable of outweighing the risk of environmental damage and NPS EN-1 imposes no limit on the number of CNP infrastructure projects that can be consented (paragraph 4.2.21).
- 4.2.1.10 In terms of the requirements for applicants for CNP infrastructure, paragraphs 4.2.10 to 4.2.12 of NPS EN-1 confirm that they must continue to show how their application meets the requirements of the NPSs applying the mitigation hierarchy, as well as any other legal and regulatory requirements. In addition, it confirms that they should also seek the advice of the appropriate SNCB or other relevant statutory body and demonstrate that all residual impacts are those that cannot be avoided, reduced or mitigated, setting out how any mitigation or compensatory measures will be monitored, and reporting agreed to ensure success.
- 4.2.1.11 The exceptions to this presumption of consent are set out in NPS EN-1 paragraph 4.1.7. Whilst the paragraph reiterates that the need case will outweigh the residual effects in all but the most exceptional cases, it also states that those exceptions include residual impacts onshore and offshore which present an unacceptable risk to, or unacceptable interference with, human health and public safety, defence, irreplaceable habitats or unacceptable risk to the achievement of net zero and to unacceptable interference offshore to navigation, or onshore to flood and coastal erosion risk.
- 4.2.1.12 The Applicants consider that none of the above exceptions apply to the Transmission Assets. The Transmission Assets have evolved to ensure that the mitigation hierarchy has been met in relation to impacts and effects identified throughout the application preparation process such that there are no effects arising from the Transmission Assets therefore there should be a strong presumption in favour of granting consent.
- 4.2.1.13 NPS EN-3 states that the government expects offshore wind to play a significant role in decarbonising the energy system. It confirms that the government has set an ambitious target to have 50 GW of offshore wind capacity by 2030, with an expectation that there will be a need for substantially more installed offshore capacity beyond this to achieve net zero by 2050.
- 4.2.1.14 NPS EN-5 relates specifically to transmission infrastructure. In paragraph 1.6.4, NPS EN-5 confirms that it is applicable to offshore transmission and underground cables at any voltage, including development required for an offshore wind generating station and including development that requires development consent following a section 35 direction from the Secretary of State.
- 4.2.1.15 NPS EN-5 reiterates at paragraph 1.1.5 that all electricity grid infrastructure within the scope of the NPS comprises CNP infrastructure:
- ‘As identified in EN-1, government has concluded that there is a critical national priority (CNP) for the provision of nationally significant low carbon*

infrastructure. This includes: for electricity grid infrastructure, all power lines in scope of EN-5 including network reinforcement and upgrade works, and associated infrastructure such as substations. This is not limited to those associated specifically with a particular generation technology, as all new grid projects will contribute towards greater efficiency in constructing, operating and connecting low carbon infrastructure to the National Electricity Transmission System. These are viewed by the government as being CNP infrastructure and should be progressed as quickly as possible.’ (paragraph 1.1.5, NPS EN-5).

- 4.2.1.16 In preparing applications for offshore-onshore transmission, section 2.13 of NPS EN-5 outlines that there should be consideration of strategic network design (including the outcomes of the HNDR) and that a coordinated approach to design should be adopted. Radial offshore transmission options to single windfarms should only be proposed where options assessment work identifies that a co-ordinated solution is not feasible. Section 2.13 of the NPS confirms policy support for a coordinated approach, as is proposed between Morgan OWL and Morecambe OWL for the Transmission Assets.

4.3 The need to reduce greenhouse gas emissions

- 4.3.1.1 As set out in **section 3.2.3**, the UK is a signatory to the Kyoto protocol, which commits industrialised countries and economies to limit and reduce GHG emissions in accordance with agreed individual targets. In December 2015, 195 signatories, including the UK, adopted the first universal, legally binding global climate deal at the Paris climate conference (COP21).
- 4.3.1.2 The protocol came into effect in 2005 and its commitments were transposed into UK law by the Climate Change Act 2008, as amended. A revision to the targets was made through the Climate Change Act 2008 (2050 Target Amendment) Order 2019, resulting in a target for greenhouse gas emissions to be 100% lower than the 1990 levels by the year 2050.
- 4.3.1.3 The COP28 summit in 2023 resulted in a decision to accelerate action across all areas by 2030, including a call on governments to transition away from fossil fuels to renewables such as wind and solar power in their next round of climate commitments. At COP29 to be held in November 2024, governments must establish a new climate finance goal reflecting the scale and urgency of the climate challenge.
- 4.3.1.4 The COP28 summit also included the first ‘global stocktake’, which assessed global progress towards the goals of the Paris Agreement. The stocktake concluded that implementation of the Paris Agreement is lacking throughout the world, with a clear gap between individual countries’ stated ambitions and actions and policies to achieve those goals.
- 4.3.1.5 The UK’s ambition is to lead the world in combatting climate change, reducing reliance on fossil fuels and embracing a future where renewable energy powers homes and businesses. At the centre of this drive is a commitment to reducing UK greenhouse gas emissions and reaching net zero by 2050. The UK government has an ambition to generate 50 GW of clean, renewable energy from offshore wind by 2030. Figures released by the Department for Energy Security and Net Zero (DESNZ) show that the UK

currently has approximately 15 GW of installed offshore wind capacity in the UK up to the end of 2023 (DESNZ, 2024b). As such, there is still some way to go to meet the 2030 target. The Transmission Assets would contribute towards meeting these obligations.

4.4 Future increases in electricity demand

- 4.4.1.1 NPS EN-1 (paragraph 2.2.1) explains the need for the UK to meet its 2050 emissions reductions goals.
- 4.4.1.2 Even with major improvements in overall energy efficiency, the Government expects that demand for electricity is likely to increase, as significant sectors of energy demand switch from being powered by fossil fuels to using electricity. As a result of this electrification of demand, total electricity consumption (measured in terawatt hours over a year) could double by 2050 (HM Government, 2021).
- 4.4.1.3 In 2020, the Climate Change Committee identified that as demand grows, more capacity will be needed and their balanced scenario would necessitate deploying 3 GW a year of wind, to reach 430 TWh by 2050, and reach the target 40 GW of de-rated electricity capacity by 2030, and 65 to 125 GW by 2050 (Climate Change Committee, 2020).
- 4.4.1.4 NPS EN-1 concludes that in order to secure energy supplies that enable Government obligations for 2050 to be met, there is an urgent need for new (and particularly low carbon) energy projects to be brought forward as soon as possible. The Transmission Assets would contribute significantly towards meeting these obligations as a project for which development consent is required to connect two low carbon energy generating NSIPs which are considered CNP infrastructure.

4.5 Role of offshore wind and the national policy support

- 4.5.1.1 As set out in **section 3.3**, the role of offshore wind is key in achieving the UK Government's renewable energy targets for 2030 and 2050. These targets are set out in a range of recent commitments, including:
- The Energy Act 2015;
 - The Clean Growth Strategy 2017;
 - The National Infrastructure Assessments 2018 and 2023 and the National Infrastructure Strategy 2020;
 - The UK offshore Wind Sector Deal 2019;
 - The Ten Point Plan for Green Industrial Revolution 2020;
 - The Energy White Paper: Powering Our Net Zero Future 2020;
 - Net Zero Strategy: Build Back Greener 2012;
 - British Energy Security Strategy 2022;
 - Powering Up Britain: The Net Zero Growth Plan 2023; and
 - Great British Energy founding statement (DESNZ, 2024a).

- 4.5.1.2 The offshore wind industry presents an opportunity to utilise and further develop the UK's maritime engineering skills as other industries decline (such as shipbuilding and North Sea oil) in order to secure supply chain and other employment opportunities in the UK. The importance of maximising opportunities to grow the offshore wind supply chain to accelerate and de-risk delivery, as well as grow market share and technology leadership for the UK is the main aim of the Offshore Wind Industrial Growth Plan (Offshore Wind Industry Council *et al.*, 2024).
- 4.5.1.3 As set out in **section 3.3**, the above legislation and policy documents set out ambitious targets for the contribution of offshore wind to renewable targets and ensuring a secure energy supply. The updated strategy 'Powering our Net Zero Future' (HM Government, 2023a) confirmed the UK's commitment to having a decarbonised power system by 2035, with the majority of power generated from renewable sources such as wind and solar. It targets an increase to 50 GW of offshore wind capacity by 2030. This is a 3.5-fold increase on today's installed capacity. In addition, the UK Government would generate more power than all our homes use today, back new innovations to make the most of this proven technology and invest to bring new jobs and growth to our ports and coastal regions.

4.6 Local climate change declarations, targets and actions

- 4.6.1.1 Blackpool Council, Preston City Council, South Ribble Borough Council and Lancashire County Council have all declared climate emergencies which recognise the important role renewable energy has in minimising the impact of climate change and have set a target to reach net zero by 2030, mitigating climate change through green energy production, increasing energy efficiency, and reducing emissions caused by the larger emitters.
- 4.6.1.2 Although Fylde Council has not declared a climate emergency, the Council is currently working to achieve their net-zero target and reduce greenhouse gas emissions from Council operations.
- 4.6.1.3 The Transmission Assets will connect two large offshore wind farms to the UK electricity transmission network, contributing to meeting both national and local climate change goals.

5 Accordance with National Policy Statements and other national and local policy

5.1 Overview

- 5.1.1.1 This section presents a high level overview of the Transmission Assets' accordance with each relevant NPS, as well as with other relevant policy, including marine policy, the NPPF and relevant local planning policy, as set out in **section 3**.
- 5.1.1.2 To reiterate, the Transmission Assets are development for which development consent is required by virtue of the section 35 direction. On this basis, the Applicants are of the position that NPS EN-1 paragraph 1.3.10 applies to the Transmission Assets which defines that '*EN-1, in conjunction with any relevant technology specific NPS, will be the primary policy for Secretary of State decision making on projects in the field of energy for which a direction has been given under section 35*'.
- 5.1.1.3 Further details of compliance with the NPSs are provided in the NPS tracker (document reference J26).
- 5.1.1.4 With regards to the NPSs, the latest versions were published in November 2023 and formally designated on 17 January 2024. Therefore, the application for development consent and this Planning Statement has regard to these designated NPSs.
- 5.1.1.5 Each topic section of this Planning Statement is considered using the following structure:
- topic name and document reference;
 - summary of assessment and identification of main elements;
 - proposed mitigation measures (if required); and
 - any significant effects.
- 5.1.1.6 In terms of general environmental effects/considerations, section 4.3 of NPS EN-1 sets out the approach that applicants should take. The Applicants have complied with the requirements of this section of NPS EN-1 as set out below.
- 5.1.1.7 As the Transmission Assets are subject to the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations), the application is accompanied by an ES.
- 5.1.1.8 In accordance with **NPS EN-1 paragraph 4.3.10**, the ES provides information proportionate to the scale of the Transmission Assets that is sufficient to meet the requirements of the EIA Regulations.
- 5.1.1.9 **NPS EN-1 paragraphs 4.3.11 and 4.3.12** recognise that where consent is applied for and obtained before construction commences, there may be design elements that are unknown to an applicant at the time of application. The Transmission Assets has adopted a project design envelope approach. This approach defines a design envelope and parameters within which the final design will sit. This allows flexibility for elements that are likely to require more detailed design subsequent to submission of an ES, such as siting of

infrastructure and construction methods. It also allows the findings of the consultation process and feedback from statutory and non-statutory stakeholders to be considered during the design process, where appropriate.

- 5.1.1.10 The adoption of this approach allows meaningful EIA to take place by defining a 'maximum design scenario' on which to base the identification of likely environmental effects. The maximum design scenario is the scenario that would give rise to the greatest impact (and subsequent effect). For example, where several substation design options are under consideration, the assessment is based on the option predicted to have the largest magnitude of impact. This may be the option with the largest footprint, the greatest height or the largest area of disturbance during construction, which could vary depending on the topic under consideration. By identifying the maximum design scenario for any given impact, it can be concluded that the impact (and therefore the resulting effect) would be no greater for any other design scenario. Further details can be found in Volume 1, Chapter 5: Environmental assessment methodology of the ES (document reference F1.5).
- 5.1.1.11 In order to avoid repetition in the topic sections below, it is also confirmed that all topics have assessed all phases of the Transmission Assets (construction, operation and maintenance, and decommissioning) and the cumulative effects of the Transmission Assets in conjunction with other projects, as well as potential transboundary effects.
- 5.1.1.12 Additionally, it is noted that a number of NPS EN-1 topic-specific sections refer to the 25 Year Environment Plan (HM Government, 2018). The UK government set out its vision for a quarter of-a-century action to help the natural world regain and retain good health, and a commitment to review the plan every five years was set into law in the Environment Act 2021. The Environmental Improvement Plan was published in 2023 (HM Government, 2023b), which reinforces the intent of the 25 Year Environment Plan and sets out a plan to deliver on its framework and vision. The government's policy for biodiversity is set out in the Environmental Improvement Plan 2023, the aim of which is to halt overall biodiversity loss by 2030 and then reverse loss by 2042 in the context of the challenge presented by climate change.
- 5.1.1.13 The Environment Act 2021 sets out a number of targets and those that are relevant to the Transmission Assets are considered in the NPS tracker (document reference J26).

5.2 Physical processes

- 5.2.1.1 Volume 2, Chapter 1 of the ES (document reference F2.1) sets out the assessment of effects in relation to physical processes. The term physical processes refer to coastal and marine processes and their relationship with the physical environment. This includes tidal currents, the wave climate and the sediment transport regime.
- 5.2.1.2 The assessment of physical processes for the Transmission Assets has been informed by modelling undertaken for the Morgan Offshore Wind Project and site-specific survey data. This has been considered together with a detailed

review of existing studies and datasets, including those relating to the Generation Assets.

- 5.2.1.3 The assessments were undertaken having full regard to NPS EN-1 paragraphs 5.6.10 – 5.6.17 and 5.6.23 and NPS EN-3 paragraphs 2.8.111 – 2.8.114; 2.8.119; 2.8.124; 2.8.126; 2.8.197- 2.8.200; 2.8.224 and 2.8.225.
- 5.2.1.4 Mitigation measures proposed by the Applicants include the following, to be secured as part of the Commitments Register (document F1.5.3) submitted as part of the application for development consent.
- Outline Offshore Cable Specification and Installation Plan (document reference J15), including details of cable burial depths, cable protection, cable monitoring and a cable layout plan.
 - Construction Method Statement(s) will be produced and include details of foundation installation of methodology covering scour protection and the deposition of material arising from drilling, dredging, and/or soundwave clearance.
- 5.2.1.5 The Transmission Assets have been assessed as required by the relevant NPSs and the North West Inshore and North West Offshore Marine Plan.
- 5.2.1.6 Overall, it is concluded that there will be no significant effects arising from the Transmission Assets during the construction, operation and maintenance, or decommissioning phases. There would be no significant cumulative or transboundary effects.
- 5.2.1.7 Accordingly, it has been demonstrated that the Transmission Assets accord with the requirements of **NPS EN-1 and EN-3** and with **Policies NW-CAB-1, NW-MPA-1, NW-MPA-4, NW-BIO-1 and NW-CE-1** of the North West Inshore and North West Offshore Marine Plan.
- 5.2.1.8 The Transmission Assets benefit from the presumption in favour of consent applying to CNP infrastructure. This presumption is unaffected by the predicted effects on physical processes. A full list of compliance is included in the NPS tracker (document reference J26) and marine policies tracker (document reference J28.2).

5.3 Benthic subtidal and intertidal ecology

- 5.3.1.1 Volume 2, Chapter 2 of the ES (document reference F2.2) sets out the assessment of effects in relation to benthic ecology. Benthic ecology refers to the communities of animals and plants that live on or in the seabed and the relationships that they have with each other and with their physical environment. Subtidal ecology relates to the ecology present beneath mean low water springs, while intertidal area relates to the area between mean low water springs and mean high water springs. Effects on the protected features associated with the Fylde Marine Conservation Zone are also set out within the MCZ Assessment (document reference E4).
- 5.3.1.2 The assessment for benthic ecology has been informed by a series of site-specific surveys using grab sampling and underwater video. An intertidal survey was also undertaken.
- 5.3.1.3 Mitigation measures proposed by the Applicants include the following.

- Trenchless crossings to be undertaken by non-impact methods such as Horizontal Directional Drilling (or other trenchless techniques including micro tunnelling and direct pipe) in order to minimise construction noise and vibration beyond the immediate location of works.
- An Outline Offshore Cable Specification and Installation Plan (document reference J15), including details of cable burial depths, cable protection, cable monitoring and a cable layout plan. This includes measures to limit the extent of cable protection and sandwave clearance within the Fylde MCZ and for any cable protection used within the Fylde MCZ to be designed to be removable on decommissioning.
- An Offshore Environmental Management Plan will be developed, to include a Marine Pollution Contingency Plan. This will include details of measures to prevent accidental spills, address all potential contaminant releases and include key emergency details, as well as action proposed to minimise invasive species.
- All permanent infrastructure located between mean low water springs and mean high water springs will be buried to a target depth of 3 metres, subject to further pre-construction surveys to be reported within a Cable Burial Risk Assessment.
- Construction Method Statement(s) will be produced prior to construction and details of cable installation and foundation installation.
- A Marine Enhancement Statement (document reference J12) provide further information on the approach of the Transmission Assets to biodiversity benefit and ecological enhancement.

- 5.3.1.4 With regard to benthic subtidal and intertidal ecology, the Transmission Assets have been assessed as required by the relevant NPSs and the North West Inshore and North West Offshore Marine Plan.
- 5.3.1.5 The assessment has not identified any significant effects arising from the Transmission Assets during the construction, operation and maintenance, or decommissioning phases. Cumulative effects with other developments have been assessed. One significant cumulative effect has been identified with the Morgan Offshore Wind Project, in relation to temporary habitat disturbance/loss. The significance of this cumulative effect is predicted to decrease in the long term as the sediments and associated benthic communities will recover over time. In the longer term, no significant cumulative effects are predicted.
- 5.3.1.6 Accordingly, it has been demonstrated that the Transmission Assets accord with the requirements of **NPS EN-1 paragraphs 4.3.10 to 4.3.29; 5.4.9; 5.4.16 - 5.4.21; 5.4.35 - 5.4.36; 5.4.42 - 5.4.43; 5.4.48; 5.6.11 - 5.6.13 and NPS EN-3 paragraphs 2.8.52 – 2.8.53; 2.8.90 – 2.8.92; 2.8.106; 2.8.113; 2.8.119; 2.8.126; 2.8.231 - 2.8.235; 2.8.317 and 2.11.40 and with Policies NW-MPA-1, NW-BIO-1, NW-BIO-2, NW-BIO3, NW-INNS-1, NW-CE-1 of the North West Inshore and North West Offshore Marine Plan.**
- 5.3.1.7 The Transmission Assets benefit from the presumption in favour of consent applying to CNP infrastructure. This presumption is unaffected by the predicted effects on benthic subtidal and intertidal ecology. A full list of

compliance is included in the NPS tracker (document reference J26) and marine policies tracker (document reference J28.2).

5.4 Fish and shellfish ecology

- 5.4.1.1 Volume 2, Chapter 3 of the ES sets out the assessment of effects in relation to fish and shellfish ecology (document reference F2.3).
- 5.4.1.2 Fish and shellfish ecology refers to communities of animals (various commercially and ecologically important fish, crustacean and mollusc species). This includes those that live in the water column or on and in the seabed, including diadromous fish (those that move between freshwater to saltwater) which move into freshwater environments for spawning activity and the relationships these organisms have with each other and the physical environment.
- 5.4.1.3 The fish and shellfish ecology assessment has been informed primarily by a literature review of the large amount of data available on the species found in the Irish Sea, stakeholder consultation, and incorporation of some site-specific data collected where possible. The assessments were undertaken having full regard to the relevant sections of NPSs EN-1 and EN-3. Relevant data from seabed characterisation surveys were also considered to better understand the habitats present.
- 5.4.1.4 Mitigation measures proposed by the Applicants include the following.
- Outline Offshore Cable Specification and Installation Plan (document reference J15), including details of cable burial depths, cable protection, cable monitoring and a cable layout plan.
 - An Outline Marine Mammal Mitigation Protocol (document reference J18), including measures to be adopted during construction to reduce the risk of injury to marine mammals and fish species.
 - An Offshore Environmental Management Plan, including actions to minimise invasive species and a Marine Pollution Contingency Plan which will include planning for accidental spills, address all potential contaminant releases and include key emergency details.
 - Construction Method Statement(s) will be produced prior to construction and details of cable installation and foundation installation.
- 5.4.1.5 There is potential for herring to be subject to effects from underwater sound, should unexploded ordnance clearance occur during the known spawning period for this species, however given the very short duration, highly intermittent nature of potential clearance activities and implementation of the mitigation hierarchy, this is an unlikely scenario.
- 5.4.1.6 Cod is also considered sensitive to underwater sound. However, based upon the short term and intermittent nature of potential clearance events, and the application of the mitigation hierarchy, no significant effect for cod, along with herring and other fish and shellfish species is predicted.
- 5.4.1.7 In terms of temporary and long term habitat loss or disturbance, the proportion of habitat lost, including spawning and nursery grounds,

associated with the Transmission Assets is predicted to be small in the context of available habitats in the wider area and natural behaviours are expected to return following short term habitat disturbance.

- 5.4.1.8 A Marine Enhancement Statement (document reference J12) is provided as part of the application.
- 5.4.1.9 Based on the above, the assessment has not identified any significant effects arising from the Transmission Assets during the construction, operation and maintenance or decommissioning phases and has not identified any significant cumulative effects, which demonstrates that the Transmission Assets accord with the requirements of **NPS EN-1 paragraphs 4.1.11 - 4.1.16; 4.3.3 - 4.3.5; 4.3.10 - 4.3.12; 4.5.8 - 4.5.9; 4.10.5; 4.12.5 - 4.12.7; 5.4.17 - 5.4.22; 5.4.35 - 5.4.36; 5.4.40; 5.4.42; 5.4.48; 5.6.10; 5.12.6 and 5.12.11 - 5.11.12; NPS EN-3 paragraphs 2.8.32 - 2.8.33; 2.8.72; 2.8.83 - 2.8.85; 2.8.101 - 2.8.106; 2.8.148 - 2.8.151; 2.8.221; 2.8.239; 2.8.245 - 2.8.249 and 2.8.302.** The Transmission Assets also comply with policies on **Marine ecology and biodiversity, renewable energy and fisheries of the UK Marine Policy Statement and NW-FISH-3, NW-MPA-A, NW-BIO-2, NW-INNS-1, NW-DIST-1, NW-UWN-2, NW-CE-1 and NW-CBC-1** of the North West Inshore and North West Offshore Marine Plan.
- 5.4.1.10 The Transmission Assets benefit from the presumption in favour of consent applying to CNP infrastructure. This presumption is unaffected by the predicted effects on fish and shellfish ecology. A full list of compliance is included in the NPS tracker (document reference J26) and marine policies tracker (document reference J28.2).

5.5 Marine mammals

- 5.5.1.1 Volume 2, Chapter 4 of the ES (document reference F2.4), sets out the assessment of effects in relation to marine mammals.
- 5.5.1.2 Information on marine mammals within the study area was collected through desktop review, site surveys and consultation.
- 5.5.1.3 Two site-specific aerial digital survey campaigns that fall within the Offshore Order Limits have informed the baseline characterisation. These were undertaken for the Generation Assets.
- 5.5.1.4 In addition, an extensive review of existing studies and datasets, including other plans and projects within the study area, was undertaken to characterise the baseline environment for marine mammals. Data from research surveys have also been considered.
- 5.5.1.5 Mitigation measures proposed by the Applicants include the following.
- Outline Offshore Cable Specification and Installation Plan (document reference J15), including details of cable burial depths, cable protection, cable monitoring and a cable layout plan.
 - The implementation of a Marine Mammal Mitigation Protocol and measures such as soft start, ramp up for piling and the use of low-order techniques for unexploded ordnance detonation to reduce the risk of injury for all species.

- Development of, and adherence to, an Offshore Environmental Management Plan, including a Marine Pollution Contingency Plan which will include planning for accidental spills, address all potential contaminant releases and include key emergency details.
- Construction Method Statement(s) will be produced prior to construction and details of cable installation and foundation installation.
- Vessel Traffic Management Plan(s) will be developed pre-construction in line with legislation, guidance and industry best practice which will:
 - determine vessel routing to and from construction areas and ports;
 - include vessel standards and a code of conduct for vessel operators; and
 - minimise, as far as reasonably practicable, encounters with marine mammals.

5.5.1.6 An Offshore Decommissioning Programme(s) will be developed prior to decommissioning.

5.5.1.7 One significant cumulative effect has been identified, relating to potential injury from unexploded ordnance clearance for harbour porpoise, where a potentially significant cumulative effect has been identified if high order detonation is required and therefore the Applicants have prepared an Outline Marine Mammal Mitigation Protocol (document reference J18), which will be secured through the deemed marine licences. The protocol will be implemented during construction to reduce the risk of injury to marine mammals' key receptors.

5.5.1.8 Accordingly, it has been demonstrated that Transmission Assets, subject to the mitigation proposed, accords with the requirements of **NPS EN-1 paragraphs 5.4.17- 5.4.22 and 5.3.35** as well as **NPS EN-3 paragraphs 2.8.52 - 2.8.53; 2.8.90 – 2.8.92; 2.8.98; 2.8.102 – 2.8.106; 2.8.131 – 2.8.135 and 3.8.312 – 3.8.314** and with the **UK Marine Policy Statement and NW-MPA-1, NM-BIO-2, NW-UWN-2 and NW-CE-1** of the North West Inshore and North West Offshore Marine Plan.

5.5.1.9 The Transmission Assets benefit from the presumption in favour of consent applying to CNP infrastructure. This presumption is unaffected by the predicted effects on marine mammals. A full list of compliance is included in the NPS tracker (document reference J26) and marine policies tracker (document reference J28.2).

5.6 Offshore ornithology

5.6.1.1 Volume 2, Chapter 5 of the ES (document reference F2.5) sets out the assessment of effects in relation to offshore ornithology. Offshore ornithology refers to the communities of birds that utilise or fly over the area seaward of mean low water springs.

5.6.1.2 The identification of existing conditions was informed by desk-based studies and supporting survey data from surveys of the Generation Assets.

5.6.1.3 Mitigation measures proposed by the Applicants include the following.

- Outline Offshore Cable Specification and Installation Plan (document reference J15), including details of cable burial depths, cable protection, cable monitoring and a cable layout plan.
- An Offshore Decommissioning Programme(s) will be developed prior to decommissioning.
- An Offshore Environmental Management Plan(s), including details of:
 - a marine pollution contingency plan; and
 - measures to minimise disturbance to rafting birds from vessels.
- Construction activities associated with the offshore cable pull in would be restricted to one cable pull in per wintering season (i.e., during the months of November – February), unless otherwise agreed with the Marine Management Organisation, in consultation with Natural England.
- The total number of vessels actively working within the Liverpool Bay/Bae Lerpwl Special Protection Area during construction or during operation and maintenance phase will be limited to a maximum of five vessels at any one time in the wintering period, i.e., between November and February (inclusive). This will be included within the Offshore Environmental Management Plan(s).

5.6.1.4 The Applicants' approach to biodiversity enhancement is presented in the Marine Enhancement Statement (document reference J12). The Applicants have identified a number of opportunities within the Irish Sea which could deliver additional intertidal and offshore biodiversity benefits, including increases to the productivity of breeding seabirds, biodiversity enhancing cable protection, artificial reef blocks and restoration of fish and shellfish habitats outside of protected sites. The Applicants will continue to explore these opportunities as the design of the Transmission Assets develops, in collaboration with stakeholders post-consent.

5.6.1.5 Overall, the assessment has not identified any significant effects arising from the Transmission Assets during the construction, operation and maintenance or decommissioning phases or significant cumulative impacts.

5.6.1.6 Accordingly, it has been demonstrated that the Transmission Assets accord with the requirements of **NPS EN-1 paragraphs 4.3.1, 4.3.3, 4.3.5, 4.3.10, 4.3.11, 4.3.12, 5.4.4, 5.4.5, 5.4.7, 5.4.16, 5.4.17, 5.4.19, 5.4.35, 5.4.48, and 5.4.55** as well as **EN-3 paragraphs 2.8.143, 2.8.104, 2.8.136 and 2.8.302** and **NPS EN-5 paragraphs 2.7.2, 2.7.3, 2.9.5 and 2.9.6**. In addition, Transmission Assets also comply with the requirements of **NW-SCP-1, NW-DIST-1, NW-UWN-2, NW-CBC-1, NW-MPA-1, NW-BIO-1, NW-BIO-2 and NW-CE-1** of the North West Inshore and North West Offshore Marine Plan.

5.6.1.7 The Transmission Assets benefit from the presumption in favour of consent applying to CNP infrastructure. This presumption is unaffected by the predicted effects on offshore ornithology. A full list of compliance is included in the NPS tracker (document reference J26) and marine policies tracker (document reference J28.2).

5.7 Commercial fisheries

- 5.7.1.1 Volume 2, Chapter 6 of the ES (document reference F2.6) sets out the assessment of effects in relation to commercial fisheries. Commercial fisheries are defined as any form of fishing activity where the catch is sold for taxable profit. The existing commercial fisheries conditions were characterised through a review of publicly available data, site-specific surveys and consultation with fisheries stakeholders.
- 5.7.1.2 Impacts that have been assessed within include loss or restricted access to fishing grounds, displacement of fishing activity, loss of damage to fishing gear due to snagging, potential impacts on commercially important fish and shellfish resources stocks and supply chain opportunities for local fishing vessels.
- 5.7.1.3 Mitigation measures proposed by the Applicants include the following.
- Outline Offshore Cable Specification and Installation Plan (document reference J15), including details of cable burial depths, cable protection, cable monitoring and a cable layout plan.
 - Outline Fisheries Liaison and Coexistence Plan(s), setting out the commitments relating to coexistence with the fishing industry and to ensure navigational safety. This includes the appointment and responsibilities of a company fisheries liaison officer. The Outline Fisheries Liaison and Coexistence Plan(s) also includes details for providing advance warning and information on accurate locations for construction and maintenance activities, associated Safety Zones and advisory passing distances to be given via Notifications to Mariners to ensure navigation safety.
- 5.7.1.4 The assessment has not identified any significant effects arising from the Transmission Assets during the construction, operation and maintenance, or decommissioning phases in relation to commercial fisheries. It is also concluded that there will be no significant cumulative effects on commercial fisheries from the Transmission Assets alongside other projects/plans following the implementation of embedded and further mitigation measures.
- 5.7.1.5 Accordingly, it has been demonstrated that the Transmission Assets accord with the requirements of **NPS EN-3; paragraphs 2.8.147; 2.8.153 – 2.8.164; 2.8.318 - 2.8.324 and 2.8.250 - 2.8.251; paragraphs 3.8.1 – 3.8.2** of UK Marine Policy Statement as well as **policies NW-FISH-2, NW-FISH-3, NW-CE-1 and NW-CO-1** of the North West Inshore and North West Offshore Marine Plan.
- 5.7.1.6 The Transmission Assets benefit from the presumption in favour of consent applying to CNP infrastructure. This presumption is unaffected by the predicted effects on commercial fisheries. A full list of compliance is included in the NPS tracker (document reference J26) and marine policies tracker (document reference J28.2).

5.8 Shipping and navigation

- 5.8.1.1 Volume 2, Chapter 7 of the ES (document reference F2.7) sets out the assessment of effects in relation to shipping and navigation. This is supported by the Navigation Risk Assessment (document reference F2.7.1). This considers impacts upon maritime safety and the activities of commercial shipping, ferries, ports/harbours, commercial fisheries, recreational cruising and other maritime operations.
- 5.8.1.2 The existing shipping and navigation conditions were identified through a review of relevant publications, collection and analysis of historic vessel traffic and incident data and consultation with key stakeholders.
- 5.8.1.3 Mitigation measures proposed by the Applicants include the following.
- Cable Burial Risk Assessment will be included as part of the Outline Offshore Cable Specification and Installation Plan (document reference J15) .
 - Layout Principles to be agreed with the Marine Management Organisation, in consultation with the Maritime Coastguard Agency and Trinity House prior to construction.
 - Development of Fisheries Liaison and Co-existence Plan, Offshore Emergency Response and Safety Plan and an Outline Offshore Construction Environmental Management Plan (to include a marine pollution contingency plan). This will include details for providing advance warning and information on accurate locations for construction and maintenance activities, associated Safety Zones, and advisory passing distances to be given via Notifications to Mariners to ensure navigation safety.
 - Safety Zone Statements will be produced and include safety zones of up to 500 m and the use of guard vessels.
- 5.8.1.4 The Applicants will ensure compliance with legislation for vessel traffic monitoring and continuous watch, where appropriate, in consultation with the Maritime Coastguard Agency and would be secured through relevant conditions as part of the marine licence(s) and suitable lighting and marking of offshore structures.
- 5.8.1.5 Overall, the assessment has not identified any significant effects arising from the Transmission Assets during the construction, operation and maintenance, or decommissioning phases in relation to shipping and navigation.
- 5.8.1.6 The impact on vessel to vessel collision risk, snagging risk and oil and gas navigation, operations and safety were assessed as having a moderate (but as low as reasonably possible) adverse effect.
- 5.8.1.7 Commitments are set out by the Applicants to mitigate the risk and minimise the contribution of the Transmission Assets to the cumulative effects. Commitments are also set out separately by the Generation Assets and the Mona Offshore Wind Project will also mitigate against the effects on commercial operators.

- 5.8.1.8 In summary, it is considered that the Transmission Assets, subject to the mitigation proposed, accords with the requirements of NPS EN-3 which recognises at paragraph 2.8.178 that it is inevitable that offshore wind farms will have an impact on navigation in and around the area of their sites.
- 5.8.1.9 With regard to shipping and navigation, the Transmission Assets have been assessed as required by the relevant **NPS EN-3 paragraphs 2.8.178 – 2.8.190 and 2.8.195; UK Marine Plan 2011 and policies PS-1 to PS-4** of the North West Inshore and North West Offshore Marine Plan.
- 5.8.1.10 The Transmission Assets benefit from the presumption in favour of consent applying to CNP infrastructure. This presumption is unaffected by the predicted effects on shipping and navigation. A full list of compliance is included in the NPS tracker (document reference J26) and marine policies tracker (document reference J28.2).

5.9 Marine archaeology

- 5.9.1.1 Volume 2, Chapter 8 of the ES (document reference F2.8) sets out the assessment of effects in relation to marine archaeology.
- 5.9.1.2 Marine archaeology refers to the physical remains of the human past that survive within the marine environment. This includes maritime archaeology, such as shipwrecks and submerged prehistory.
- 5.9.1.3 The existing marine archaeology conditions have been characterised through a review of existing data and studies alongside an assessment of site-specific geophysical surveys.
- 5.9.1.4 Mitigation measures proposed by the Applicants include the following.
- An offshore written scheme of investigations for archaeology, including:
 - the requirement for Archaeological Exclusion Zones and Temporary Archaeological Exclusion Zones, as presented in the Offshore Historic Environment Plan;
 - implementation of a Protocol for Archaeological Discoveries in accordance with ‘Protocol for Archaeological Discoveries: Offshore Renewables Projects’;
 - the incorporation of marine archaeology specification and analysis in further pre-construction surveys;
 - operational awareness and avoidance, where possible, of low potential anomalies;
 - where avoidance of low potential anomalies is not possible, mitigation measures for potential direct impacts to marine archaeology; and
 - details of reporting and archival requirements.
- 5.9.1.5 Overall, the assessment has not identified any significant effects arising from the Transmission Assets during the construction, operation and maintenance or decommissioning phases. Cumulative effects with other developments

have been assessed. The assessment has not identified any significant cumulative effects.

5.9.1.6 The provisions of an Outline Offshore Written Scheme of Investigation for Archaeology (document reference J17) will result in a beneficial effect in relation to marine archaeology as these will ensure that any future geophysical and geotechnical surveys undertaken that result in the production of new archaeological data and, therefore, the understanding of the historic marine environment of the area will be made public.

5.9.1.7 Given the limited adverse effects and the beneficial effect of the Transmission Assets in relation to marine archaeology, it is considered that the Transmission Assets accord with the requirements of **NPS EN-1 paragraphs 5.9.10 - 5.9.13** and **NPS EN-3 paragraphs 2.8.76 - 2.8.78; 2.8.104; 2.8.176 and 2.8.252 - 2.8.253** as well as the **UK Marine Policy Statement and policies NW-AGG-1; NW-CO-1; NW-CAB-1; NW-CAB-3 and NW-OG-1** of the North West Inshore and North West Offshore Marine Plan.

5.9.1.8 The Transmission Assets benefit from the presumption in favour of consent applying to CNP infrastructure. This presumption is unaffected by the predicted effects marine archaeology. A full list of compliance is included in the NPS tracker (document reference J26) and marine policies tracker (document reference J28.2).

5.10 Other sea users

5.10.1.1 Volume 2, Chapter 9 of the ES (document reference F2.9) sets out the assessment of effects in relation to other sea users. This includes consideration of the following.

- aggregate extraction and disposal sites.
- recreational diving and bathing sites.
- recreational activities such as sailing, motor cruising, recreational fishing and inshore water sports.
- offshore infrastructure such as:
 - offshore wind farms;
 - oil and gas activities;
 - Carbon Capture Storage (CCS) activities;
 - Offshore hydrocarbon platforms;
 - cables; and
 - pipelines.

5.10.1.2 Data has been collated based on existing data sources at both a regional and local level. No site-specific surveys have been undertaken to inform the EIA process for other sea users. This is because a sufficient amount of information relating to other sea users is already available.

5.10.1.3 Mitigation measures proposed by the Applicants include the following.

- Outline Offshore Cable Specification and Installation Plan (document reference J15), including details of cable burial depths, cable protection, cable monitoring and a cable layout plan.
- A Fisheries Liaison and Coexistence Plan(s), including details for providing advance warning and information on accurate locations for construction and maintenance activities, associated Safety Zones, and advisory passing distances to be given via Notifications to Mariners to ensure navigation safety.
- Crossing and proximity agreements with known existing pipeline and cables operators.
- Ongoing liaison with the fishing industry through the appointment of a Company Fisheries Liaison Officer(s) and adherence to good practice guidance with regards to fisheries liaison.
- The United Kingdom Hydrographic Office will be notified of both the commencement, progress and completion of offshore construction works to allow marking of all installed infrastructure on nautical charts.
- Safety zones of up to 500 m will be applied during construction, maintenance and decommissioning activities. Where defined by risk assessment, guard vessels will also be used to ensure adherence with Safety Zones or advisory passing distances to mitigate impacts which pose a risk to surface navigation.

5.10.1.4 Overall, it is concluded that there will be no significant effects arising from the Transmission Assets on other sea users during the construction, operation and maintenance, or decommissioning phases. It is also concluded that there will be no significant cumulative effects from the Transmission Assets on other sea users alongside other projects/plans.

5.10.1.5 Given there are no significant adverse effects, it is considered that the Transmission Assets accord with the requirements of **NPS EN-1 paragraphs 3.3.71 and 5.5.35 and NPS EN-3 paragraphs 2.8.44; 2.8.196-201; 2.8.261 – 2.8.262; 2.8.342 – 2.8.345 and 2.8.348 and Policies NW-AGG-1, NW-CO-1, NW-CAB-1, NW-CAB-3 and NW-OG-1** of the North West Inshore and North West Offshore Marine Plan.

5.10.1.6 The Transmission Assets benefit from the presumption in favour of consent applying to CNP infrastructure. This presumption is unaffected by the predicted effects on other sea users. A full list of compliance is included in the NPS tracker (document reference J26) and marine policies tracker (document reference J28.2).

5.11 Geology, hydrogeology and ground conditions

5.11.1.1 Volume 3, Chapter 1 of the ES (document reference F3.1) sets out the assessment of effects in relation to geology, hydrogeology and ground conditions. This includes consideration of effects in relation to geological and land conditions (including land contamination), as well as effects on groundwater.

- 5.11.1.2 The assessments undertaken have been based on a desktop review of publicly available information, online data sources and publishing and information contained in a Groundsure Enviro-Geo Insights report. A Phase 1 Geo-Environmental Preliminary Risk Assessment has been produced to support the assessment (document reference F3.1.1).
- 5.11.1.3 Mitigation measures proposed by the Applicants include the following.
- Impacts on the designated dunes at Lytham St. Annes will be avoided through the use of direct pipe trenchless construction techniques to pass beneath the dunes.
 - Construction will be undertaken in accordance with a Code of Construction Practice (CoCP), including measures to maintain and address pollution prevention and geology and ground conditions.
 - A Pollution Prevention Plan (to form part of the CoCP), including good practice pollution control measures.
 - A Land and Groundwater Contamination Discovery Strategy to identify any suspected areas of contamination and any remedial measures which may be required.
 - Where areas of contamination (e.g. landfills) cannot be avoided within the Transmission Assets Order Limits, a ground investigation will be implemented. Appropriate Personal Protective Equipment will be used and relevant good working practices applied to avoid potential risk to human health including from any potential ground contamination, in line with relevant available guidance.
 - Where suspected contamination is present and piling is proposed, a detailed piling risk assessment will be developed prior to the commencement of construction. Consultation with the Environment Agency will be sought.
 - Where the onshore export cable corridor or 400 kV grid connection cable corridor crosses sites of particular sensitivity, a hydrogeological risk assessment will be undertaken to inform a site-specific crossing method statement which will also be agreed with the relevant authorities prior to construction.
- 5.11.1.4 Subject to those measures, the assessments conclude that none of the effects of the Transmission Assets in relation to geology, hydrogeology and ground condition are considered to be significant.
- 5.11.1.5 Given the limited adverse effects of the Transmission Assets in relation to geology, hydrogeology and ground conditions, it is considered that the Transmission Assets accord with the requirements of **NPS EN-1 paragraphs 5.4.17 - 5.4.19; 5.4.35 - 5.4.38; 5.4.41; 5.4.42; 5.4.46; 5.4.48; 5.4.50; 5.4.52; 5.11.8; 5.11.17; 5.11.18; 5.11.19; 5.11.28; 5.16.3; 5.16.6 - 5.16.16 and NPS EN-5 Paragraph 2.9.25.**
- 5.11.1.6 The Transmission Assets also comply with the NPPF paragraphs 180, 189, 190 and 218; Blackpool Local Plan Part 1: Core Strategy 2012-2027 Policy CS6; Fylde Local Plan to 2032 (incorporating Partial Review) Policies GD9; ENV2; CL1 and DLF1; Preston Local Plan 2012-26 Policies EN10 and EN7;

South Ribble Local Plan 2012-2026 Policies G8; G14 and G16; Central Lancashire Adopted Core Strategy Policy 22 and Joint Lancashire Minerals and Waste Local Plan: Site Allocation and Development Management Policies DM11 and M2.

- 5.11.1.7 The Transmission Assets benefit from the presumption in favour of consent applying to CNP infrastructure. This presumption is unaffected by any effects on geology, hydrogeology and ground conditions. A full list of compliance is included in the NPS tracker (document reference J26), the NPPF tracker (document reference J28.1) and the local policies tracker (document reference J28.3).

5.12 Hydrology and flood risk

- 5.12.1.1 Volume 3, Chapter 2 of the ES (document reference F3.2) sets out the assessment of effects in relation to hydrology and flood risk. This includes effects on onshore surface waterbodies, including rivers and streams.
- 5.12.1.2 Information on hydrology and flood risk has been collected through a detailed desktop review of existing studies, consultation with relevant stakeholders and datasets and walkover survey. A Flood Risk Assessment (document reference F3.2.3) and a Water Framework Directive assessment (document reference F3.2.1) have been undertaken.
- 5.12.1.3 The measures proposed by the Applicants include the following.
- The following features will be crossed by trenchless techniques:
 - The following Environment Agency main rivers, Moss Sluice, east of Midgeland Road; along Pegs Lane; Wrea Brook southeast of Cartmell Lane; Dow Brook east of Lower Lane between the A584 and the A583; Middle Pool north of Lund Way.
 - Where trenchless techniques are proposed for Environment Agency Main Rivers and ordinary watercourses, specific distances away from banks or flood defences will be used to ensure the export cables remain buried for the operational lifetime of the project.
 - Where trenchless techniques are proposed for crossing ordinary watercourses, geomorphological surveys will be undertaken to inform detailed designs prior to construction.
 - Construction will be undertaken in accordance with a CoCP, including flood control and measures to maintain and address measures to control runoff and flood risk during construction.
 - The implementation of an Outline Pollution Prevention Plan (document reference J1.4) and an Outline Bentonite Breakout Plan (document reference J1.14), as part of the Outline CoCP (document reference J1) will control potential impacts. The Outline CoCP also contains information about drainage during construction to intercept runoff and ensure that discharges are controlled in quality and volume and cause no degradation in water quality classification.

- An Outline Operational Drainage Management Plan for the substation site(s) (document reference J10), including measures to limit discharge rates and attenuate flows to maintain greenfield runoff rates and measures to control surface water runoff.
- The Flood Risk Assessment undertaken demonstrates that the onshore elements of the Transmission Assets meet the requirements of relevant local and national planning policy. Construction measures will be adopted to maintain the existing level of flood protection during this phase. If applicable, these measures could include scheduling work windows against tide times and briefing site personnel regarding weather conditions, tide times and heights.
- Embedded mitigation measures include a commitment to cross beneath all ordinary watercourses and main rivers using trenchless technology.

- 5.12.1.4 Details of the proposed drainage strategies are provided in the Outline Operational Drainage Management Plan (document reference J10).
- 5.12.1.5 Taking into account the measures proposed, the assessment has not identified any significant effects arising from the Transmission Assets during the construction, operation and maintenance or decommissioning phases. In addition, it is concluded that there will be no significant cumulative effects from the Transmission Assets.
- 5.12.1.6 With the proposed mitigation in place, it is considered that the Transmission Assets accord with the requirements of **NPS EN-1 paragraphs 5.8.13 – 5.8.42; 5.16.3, 5.16.5 – 5.16.16; NPS EN-3 paragraph 2.4.8 and NPS EN-5 paragraphs 2.3.2 and 2.9.25.**
- 5.12.1.7 The Transmission Assets also comply with the NPPF paragraph 158; Blackpool Local Plan Part 1: Core Strategy 2012-2027 Policy CS9; Blackpool Local Plan Part 2: Site Allocations and Development Management Policies Adopted February 2023 Policies D M31; D M33 and D M36; Fylde Local Plan to 2032 (incorporating Partial Review) Policies CL1 and CL2; South Ribble Local Plan 2012-2026 Chapter J and Central Lancashire Adopted Core Strategy – Local Development Framework Policy 29.
- 5.12.1.8 The Transmission Assets benefit from the presumption in favour of consent applying to CNP infrastructure. This presumption is unaffected by any effects arising from hydrology and flood risk. A full list of compliance is included in the NPS tracker (document reference J26), the NPPF tracker (document reference J28.1) and the local policies tracker (document reference J28.3).

5.13 Onshore ecology and nature conservation

- 5.13.1.1 Volume 3, Chapter 3 of the ES (document reference F3.3) sets out the assessment of effects in relation to onshore ecology and nature conservation. Ecology refers to the communities of animals and plants which live in the environment and the relationships that they have with each other and with the physical environment.

- 5.13.1.2 Information on onshore ecology and nature conservation was collected through a desk study and detailed analysis of data gathered during site-specific surveys and consultation with relevant stakeholders.
- 5.13.1.3 The Ribble and Alt Estuaries Special Protection Area and Ramsar site are partly within the Intertidal Infrastructure Area. In addition, the Lytham St Annes Dunes SSSI and the Ribble Estuary SSSI are located partly within the Onshore Order Limits. A number of other nationally and locally designated sites have been identified and considered within the assessment.
- 5.13.1.4 The baseline surveys have identified a range of habitat types of varying quality, including habitats of importance such as coastal and floodplain grazing marsh, coastal saltmarsh, coastal sand dunes, lowland mixed deciduous woodland, good quality semi-improved grassland, mudflats, lowland fens, lowland meadows and traditional orchard.
- 5.13.1.5 The identified habitats have the potential to support a range of protected species including bats, great crested newts, sand lizards, otters, fish, aquatic and terrestrial invertebrates and plant species.
- 5.13.1.6 Mitigation measures adopted by the Applicants include the following.
- Avoidance of designated sites (including SSSIs, Local Nature Reserves, Local Wildlife Sites, Lancashire Wildlife Trust Reserves and Ancient Woodland) and ponds during the site selection process, where practicable. Where possible, unprotected areas of woodland, mature and protected trees (i.e., veteran trees) have been avoided.
 - Direct impacts on the designated dunes at Lytham St. Annes will be avoided through the use of direct pipe trenchless construction techniques to pass beneath the dunes.
 - Direct impacts on the River Ribble will be avoided through the use of trenchless construction techniques to pass beneath the river.
 - Where the cable corridors cross sites of particular ecological sensitivity, hydrogeological risk assessment(s) will be undertaken to inform a site-specific crossing method statement(s) where required.
 - Construction will be undertaken in accordance with a CoCP, including measures to maintain and address ecology and nature conservation (including protected species and invasive species).
 - A Pollution Prevention Plan (to form part of the CoCP), including good practice pollution control measures and emergency spill procedures.
 - An Ecological Management Plan, including measures relating to management and enhancement of habitats and protected or notable species, where relevant.
 - Where hedgerows and/or trees require removal, this will be undertaken prior to topsoil removal. Sections of hedgerows and trees which are removed will be replaced using like for like hedgerow species.
 - All vegetation requiring removal will be undertaken outside of the bird breeding season, where practicable.

- Construction site lighting will only operate when required and will be positioned and directed to avoid unnecessary illumination to sensitive ecological receptors.
- Provision will be made for badger access in relevant construction areas, when work is not taking place in order to ensure normal movements as far as reasonably possible.
- A mitigation area in the home range of otter populations will be provided east of Savick Brook.

- 5.13.1.7 There is potential for significant effects from temporary or permanent habitat loss in relation to locally designated Biological Heritage Sites, bats, great crested newts, otters and aquatic invertebrates. In addition, potentially significant effects from habitat fragmentation and isolation have been identified for two Biological Heritage Sites, bats (in relation to a maternity roost), great crested newts, otters and terrestrial invertebrates.
- 5.13.1.8 In addition, potentially significant effects have been identified associated with potential hydrogeological changes on the Lytham St Annes Dunes SSSI and Lytham St Annes Local Nature Reserve and the sand lizards in this location.
- 5.13.1.9 Mitigation measures are proposed to address the potential significant effects. With these measures in place, the only significant effect that remains is the partial loss of Mill Brook Valley Biological Heritage Site (and associated habitat).
- 5.13.1.10 A number of areas have been identified as having potential for biodiversity benefit, including provision of new habitat and opportunities for enhancement of habitats including waterbodies, hedgerows, and grassland. This will result in some long term beneficial effects. The approach to biodiversity benefit is set out in the Onshore Biodiversity Benefit Statement (document reference J11). Other measures to provide biodiversity benefit are also included within the submitted Commitments Register (document reference F1.5.3), which would be delivered if the necessary land rights are secured.
- 5.13.1.11 In terms of onshore ecology and nature conservation, the Transmission Assets have been assessed and comply with the requirements of **NPS EN-1 paragraphs 4.6.6 - 4.6.8, 4.6.10 to 4.6.18; 4.6.1 - 4.6.3; 5.4.17 - 5.4.22; 5.4.25 - 5.4.36; 5.4.41 - 5.4.50 and 5.4.52 - 5.4.55 as well as NPS EN-3 paragraphs 2.5.2 and 2.8.95 - 2.8.98 and NPS EN-5 paragraphs 2.5.1 and 2.9.25.**
- 5.13.1.12 The Transmission Assets also comply with the aims and requirements of Chapter 15 of the NPPF; Blackpool Local Plan Part 1: Core Strategy 2012-2027 Policy CS6; Blackpool Local Plan Part 2: Site Allocations and Development Management Policies Adopted February 2023 Policy D M35; Fylde Local Plan to 2032 (incorporating Partial Review) Policy ENV2; Preston Local Plan 2012-26 Policies EN10 and EN11; South Ribble Local Plan 2012-2026 Policies G7, G8, G13 and G16 and Central Lancashire Adopted Core Strategy – Local Development Framework Policy 18.
- 5.13.1.13 The Transmission Assets benefit from the presumption in favour of consent applying to CNP infrastructure. This presumption is unaffected by the predicted effects on onshore ecology and nature conservation. A full list of

compliance is included in the NPS tracker (document reference J26), the NPPF tracker (document reference J28.1) and the local policies tracker (document reference J28.3).

5.14 Onshore and intertidal ornithology

- 5.14.1.1 Volume 3, Chapter 4 of the ES (document reference F3.4) sets out the assessment of effects in relation to onshore and intertidal ornithology. This includes consideration of the bird population from mean low water springs and landward to Penwortham.
- 5.14.1.2 The assessment of effects has been informed by information on breeding, wintering and migratory birds from a desk based review of existing studies and datasets and also through site-specific surveys, including two years-worth of breeding, wintering and migratory bird surveys as well as consultation with relevant stakeholders.
- 5.14.1.3 Mitigation measures proposed by the Applicants include the following.
- Avoidance of designated sites (including SSSIs, Local Nature Reserves, Local Wildlife Sites, Lancashire Wildlife Trust Reserves, Ancient Woodland and Royal Society for the Protection of Birds (RSPB) Reserves) during the site selection process, where practicable. Where possible, unprotected areas of woodland, mature and protected trees (i.e., veteran trees) have been avoided.
 - Direct impacts on the designated dunes at Lytham St. Annes will be avoided through the use of direct pipe trenchless construction techniques to pass beneath the dunes.
 - Direct impacts on the River Ribble will be avoided through the use of trenchless construction techniques to pass beneath the river.
 - Construction will be undertaken in accordance with a CoCP, including measures to maintain and address ecology and nature conservation (including protected species and invasive species).
 - An Ecological Management Plan, including details of mitigation areas for supplementary feeding of pink-footed goose and whooper swan during the core wintering bird period (November to March, inclusive). In addition, three key areas have been identified where further mitigation can be applied to reduce and offset any adverse effects on the intertidal and terrestrial wader, goose and swan features.
 - A Breeding Bird Protection Plan will set out mitigation measures such as vegetation clearance in winter (e.g., hedgerows), pre-construction breeding bird survey, appropriate protection zones upon confirmation of nest building/breeding taking place of key protected or sensitive species.
 - All vegetation requiring removal will be undertaken outside of the bird breeding season. If this is not reasonably practicable, the vegetation requiring removal will be subject to a nesting bird check by a suitably qualified ecological clerk of works.

- Construction activities associated with the offshore cable pull in will be undertaken in accordance with the Outline Offshore Cable Specification and Installation Plan (document reference J15). This will restrict the Applicants to completing one cable pull in (a maximum of five weeks) per wintering season (i.e. during the months of November – February, inclusive), unless otherwise agreed with the MMO, in consultation with Natural England.

- 5.14.1.4 It is noted that several areas have been identified as having potential for biodiversity benefit, including provision of opportunities for enhancement for birds. This will result in a long-term beneficial effect, which may be significant. An Onshore Biodiversity Benefit Statement has been developed and submitted as part of the application to identify areas where biodiversity benefit and/or opportunities for any enhancement are proposed (document reference J11). Other measures to provide biodiversity benefit are also included within the submitted Commitments Register (document reference F1.5.3), which would be delivered if the necessary land rights are secured.
- 5.14.1.5 Taking into account the measures proposed, the assessment has not identified any significant effects arising from the Transmission Assets during the construction, operation and maintenance or decommissioning phases. Cumulative effects with other developments have been assessed. Overall, the assessment has not identified any significant cumulative effects.
- 5.14.1.6 In terms of onshore and intertidal ornithology, the Transmission Assets have been assessed and comply as required with **NPS EN-1 paragraphs 5.4.17 - 5.4.22; 5.4.25 - 5.4.36; 5.4.39; 5.4.41 - 5.4.50; 5.4.52 - 5.4.55; NPS EN- 5 paragraphs 2.5.1 and 2.9.6** as well as Chapter 15 of the NPPF; Blackpool Local Plan Part 1: Core Strategy 2012-2027 Policy CS6; Blackpool Local Plan Part 2: Site Allocations and Development Management Policies Policy D M35; Fylde Local Plan to 2032 (incorporating Partial Review) (Adopted December 2021) Policy ENV2; Preston Local Plan 2012-26 Policies EN3; EN10 and EN11; South Ribble Local Plan 2012-2026 Policies G7, G8 and G16 and Central Lancashire Adopted Core Strategy – Local Development Framework Policies 18 and 22.
- 5.14.1.7 The Transmission Assets benefit from the presumption in favour of consent applying to CNP infrastructure. This presumption is unaffected by the predicted effects on onshore and intertidal ornithology. A full list of compliance is included in the NPS tracker (document reference J26), the NPPF tracker (document reference J28.1) and the local policies tracker (document reference J28.3).

5.15 Historic environment

- 5.15.1.1 Volume 3, Chapter 5 of the ES (document reference F3.5) sets out the assessment of effects in relation to the historic environment. Historic environment encompasses all aspects of the past including buried archaeological remains, deposits of geoarchaeological or palaeoenvironmental interest (i.e., deposits containing information about past environments and human interaction with these past environments), built heritage and the character of the historic landscape.

- 5.15.1.2 The assessment of effects on the historic environment has been informed by a combination of desk-based research, site visits and site-specific fieldwork including geophysical survey and trial trenching. Consultation was undertaken with relevant stakeholders to ensure that the data sources examined thus far were the appropriate ones and that the archaeological fieldwork is being undertaken in accordance with best practice.
- 5.15.1.3 Mitigation measures proposed by the Applicants include the following.
- A range of sensitive historical areas have been avoided where possible during the site selection process, including listed buildings, scheduled monuments, registered parks and gardens conservation areas and non-designated built heritage assets.
 - An Onshore and Intertidal Written Scheme(s) of Investigation will provide details on the surveys and archaeological mitigation in advance for each stage of work, any ground breaking works and during construction.
 - Construction will be undertaken in accordance with a CoCP, including measures to maintain and address the historic environment.
- 5.15.1.4 All of the impacts on designated heritage assets identified with regard to the Transmission Assets represent less than substantial harm to the significance of those assets. None of the identified impacts would represent substantial harm as this is a particularly high test as explained in the Planning Practice Guidance (Department for Levelling Up, Housing and Communities and Ministry of Housing, Communities and Local Government, 2023).
- 5.15.1.5 Overall, it is concluded that there will be no significant effects arising from the Transmission Assets during the construction, operation and maintenance or decommissioning phases. There would be no cumulative effects from the Transmission Assets alongside other projects/plans and no potential transboundary impacts have been identified with regard to effects of the Transmission Assets.
- 5.15.1.6 In terms of historic environment, the Transmission Assets have been assessed as required by the NPS EN-1 paragraphs 5.9.9 - 5.9.36 as well as the NPPF paragraphs 200 - 203; 205 -209 and 212; Blackpool Local Plan Part 1: Core Strategy 2012-2027 Policy CS8; Blackpool Local Plan Part 2: Site Allocations and Development Management Policies, Policies D M28 and D M30; Fylde Local Plan to 2032 (incorporating Partial Review) (Adopted December 2021) Policy ENV5; Preston Local Plan 2012-26 Policies EN8 and South Ribble Local Plan 2012-2026 Policy G17.
- 5.15.1.7 The assessment carried out has confirmed that no significant effects in relation to historic environment have been identified, with effects resulting in less than substantial harm to the significance of designated or non-designated heritage assets. None of the identified impacts would represent substantial harm.
- 5.15.1.8 The Transmission Assets benefit from the presumption in favour of consent applying to CNP infrastructure. This presumption is unaffected by any predicted effects on historic environment. A full list of compliance is included in the NPS tracker (document reference J26), the NPPF tracker (document reference J28.1) and the local policies tracker (document reference J28.3).

5.16 Land use and recreation

- 5.16.1.1 Volume 3, Chapter 6 of the ES (document reference F3.6) sets out the assessment of effects in relation to the existing land uses, including agriculture and recreation, which may be directly or indirectly affected during the construction, operation and maintenance and decommissioning phase of the Transmission Assets. The assessment considered the potential impacts on agricultural land quality, land holdings and recreational resources (e.g., coastal areas, public open spaces, golf courses, caravan parks, stables), including public rights of way (e.g., footpaths, bridleways) and other promoted routes, such as National Cycle Routes and Long Distance Paths.
- 5.16.1.2 Existing land uses were identified through a combination of desk-based analysis and site-specific surveys. Desk based analysis of existing studies and datasets were used to identify the quality of agricultural land, the types and patterns of soils, farm holdings and recreational resources, including public rights of way. In addition, soil surveys were also undertaken in 2024 to confirm the quality and characteristics of agricultural land within the Onshore Order Limits.
- 5.16.1.3 Mitigation measures proposed by the Applicants include the following and are contained with the Commitments register (document reference F1.5.3):
- Construction will be undertaken in accordance with a CoCP, including measures to maintain and address soil management and recreation. It also includes that farm access routes between fields within a farm holding will be maintained (where reasonably practicable), or alternative routes agreed with the land holder to enable the continued operation of agricultural land holdings during the construction phase, where this may be possible.
 - Installation of cables at Blackpool Road Playing Fields would be by trenchless techniques, avoiding the need to trench through this area.
 - Construction will be undertaken in accordance with the Public Rights of Way Management Plan to minimise the disturbance to rights of way, where practicable.
 - Construction will be undertaken in accordance with the Soil Management Plan to characterise and manage soil materials during construction. Soil types would be determined via site-specific survey work.
 - An Outline Open Space Management Plan has been appended to the Outline Public Right of Way Management Plan (document reference J1.5), which includes measures to minimise potential impacts to the users of Lytham St Annes beach and Blackpool Road Recreation Ground.
- 5.16.1.4 Temporary adverse effects on public rights of way, including footpaths and bridleways arising from disruption and reduced access during construction of the Transmission Assets as well as permanent adverse effects as a result of the permanent loss of Best and Most Versatile agricultural land would occur during construction of the Transmission Assets.

- 5.16.1.5 In terms of land use and recreation, the Transmission Assets have been assessed as required by **NPS EN-1 paragraphs 5.11.1; 5.11.4; 5.11.6; 5.11.8 - 5.11.15; 5.11.23 - 5.11.26; 5.11.29 - 5.11.35 and 5.11.38** as well as **NPS EN-5 paragraphs 2.2.11; 2.9.19 and 2.9.25**.
- 5.16.1.6 The Transmission Assets also comply with paragraphs 97; 103-104 and 180 of the NPPF; Blackpool Local Plan Part 1: Core Strategy 2012-2027 Policies CS5 and CS6; Blackpool Local Plan Part 2: Site Allocations and Development Management Policies Adopted February 2023 Policies D M35 and D M41; Fylde Local Plan to 2032 (incorporating Partial Review) (Adopted December 2021) Policies GD4; EC6; HW2; HW3; T4 and ENV3; Preston Local Plan 2012-26 Policies EN2; EN3 and EN5; South Ribble Local Plan 2012-2026 Policies G4; G7; G8; G12 and H1 and Central Lancashire Adopted Core Strategy – Local Development Framework Policies 3; 18; 19; 24 and 31.
- 5.16.1.7 The Transmission Assets benefit from the presumption in favour of consent applying to CNP infrastructure. This presumption is unaffected by the predicted effects on land use and recreation. A full list of compliance is included in the NPS tracker (document reference J26), the NPPF tracker (document reference J28.1) and the local policies tracker (document reference J28.3).

5.17 Traffic and transport

- 5.17.1.1 Volume 3, Chapter 7 of the ES (document reference F3.7) sets out the assessment of effects in relation to traffic and transport. Traffic and transport relate to the movement demand generated by the Transmission Assets and its effects upon other road users and surroundings.
- 5.17.1.2 Mitigation measures proposed by the Applicants include the following.
- A Construction Traffic Management Plan to set standards and procedures for:
 - managing the numbers and routing of Heavy Goods Vehicles during the construction phase;
 - managing the movement of employee traffic during the construction phase;
 - measures to manage the safe passage of Heavy Goods Vehicle traffic via the local highway network; and
 - details of localised road improvements if and where these may be necessary to facilitate safe use of the existing road network.
 - Temporary access points from the highway will be installed to facilitate vehicular access from the road during construction. The access points will be constructed in line with Lancashire County Council's requirements, relevant appropriate standards and in accordance with the principles established in the Outline Construction Traffic Management Plan.

- Haul road(s) will be installed within the temporary working area the onshore export cable corridor and 400 kV grid connection corridor to minimise impacts during construction.

- 5.17.1.3 Overall, it is concluded that there will be no significant effects or cumulative significant effects arising from the Transmission Assets during the construction, operations and maintenance or decommissioning phases.
- 5.17.1.4 In terms of traffic and transport, the Transmission Assets have been assessed as required by **NPS EN-1 paragraphs 5.14.1 - 5.4.21**; Paragraphs 108; 114 - 117 of the NPPF as well as Blackpool Local Plan Part 2: Site Allocations and Development Management Policies Adopted February 2023 Policy D M32; Fylde Local Plan to 2032 (incorporating Partial Review) (Adopted December 2021) Policies INF1; T1; T4; Preston Local Plan 2012-26 Policy ST2; South Ribble Local Plan 2012-2026 Policy G17 and Central Lancashire Adopted Core Strategy – Local Development Framework Policy 28.
- 5.17.1.5 The Transmission Assets benefit from the presumption in favour of consent applying to CNP infrastructure. This presumption is unaffected by the negligible effects arising from traffic and transport. A full list of compliance is included in the NPS tracker (document reference J26), the NPPF tracker (document reference J28.1) and the local policies tracker (document reference J28.3).

5.18 Noise and vibration

- 5.18.1.1 Volume 3, Chapter 8 of the ES (document reference F3.8) sets out the assessment of effects in relation to noise and vibration. Unwanted noise and vibration can lead to adverse impacts on existing residential amenity and public health. As such, it is important that the impacts of noise and vibration predicted from the construction and operation of new developments be assessed and mitigated as far as reasonably practicable.
- 5.18.1.2 The existing sound environment has been characterised via a desk-based review of existing studies and datasets and site-specific surveys where long term noise monitoring provided data for the determination of impact assessment criteria, including consultation with the relevant local authorities.
- 5.18.1.3 Mitigation measures proposed by the Applicants include the following.
- Core working hours for the construction of the landfall and onshore elements of the Transmission Assets will be as follows:
 - Monday to Saturday: 07:00 - 19:00 hours; and
 - up to one hour before and after core working hours for mobilisation ('mobilisation period'), i.e., 06:00 to 20:00.

Activities carried out during the mobilisation period will not generate significant noise levels (such as piling, or other such noisy activities).

In circumstances outside of core working practices, specific works may have to be undertaken outside the core working hours. This will include, but is not limited to, works being undertaken within and/or adjacent to Blackpool Airport and cable installation at landfall and at

the River Ribble. Advance notice of such works will be given to the relevant planning authority.

- All trenchless crossings will be undertaken by non-impact methods such as Horizontal Directional Drilling (or other trenchless techniques including micro tunnelling and direct pipe), excluding preparatory works, in order to minimise construction noise and vibration beyond the immediate location of works.
- Based on noise modelling results, where noise has the potential to cause significant adverse effects, mufflers and acoustic barriers will be used, where practicable.
- Construction will be undertaken in accordance with a CoCP, including a Construction Noise and Vibration Management Plan with measures to mitigate noise from construction activities associated with the Transmission Assets.
- Construction to be undertaken in accordance with the Construction Traffic Management Plan.
- Operational Noise Management Plan(s) for the onshore substations will identify the noise limits for the operation of the onshore substations and the measures for how these limits would be monitored.
- Best Practicable Means (as defined in section 72 of the Control of Pollution Act 1974 and section 79 of the Environmental Protection Act 1990) will be implemented during the construction, operation, maintenance aspects of the Transmission Assets, where appropriate, to ensure that noise levels are minimised within all reasonably foreseeable circumstances.

- 5.18.1.4 Overall, it is concluded that there will likely be no significant effects arising from the Transmission Assets during the construction, operation and maintenance or decommissioning phases once mitigation is applied. There will be no significant cumulative effects from the Transmission Assets alongside other projects/plans and no potential transboundary impacts have been identified in regard to effects of the Transmission Assets.
- 5.18.1.5 There are considered to be no significant noise and vibration effects and therefore the Transmission Assets accord with **NPS EN-1 paragraphs 4.15.5 - 4.15.7 and 5.12.6 - 5.12.18** as well as **NPS EN-5 paragraphs 2.9.37 - 2.9.41; 2.9.43 and 2.11.7**.
- 5.18.1.6 The Transmission Assets also accord with Paragraphs 180 and 191 of the NPPF; Blackpool Local Plan Part 1: Core Strategy 2012-2027 Policies CS7 and CS10; Blackpool Local Plan Part 2: Site Allocations and Development Management Policies Adopted February 2023 Policy D M36; Fylde Local Plan to 2032 (incorporating Partial Review) (Adopted December 2021) Policy CL3; Preston Local Plan 2012-26 Policy AD1; South Ribble Local Plan 2012-2026 Policy B1 and Central Lancashire Adopted Core Strategy – Local Development Framework Policy 18.
- 5.18.1.7 The Transmission Assets benefit from the presumption in favour of consent applying to CNP infrastructure. This presumption is unaffected by the

predicted effects on noise and vibration. A full list of compliance is included in the NPS tracker (document reference J26), the NPPF tracker (document reference J28.1) and the local policies tracker (document reference J28.3).

5.19 Air quality

- 5.19.1.1 Volume 3, Chapter 9 of the ES (document reference F3.9) sets out the assessment of effects in relation to air quality. The term air quality is a measure used to describe the level of pollutants present within the air.
- 5.19.1.2 Existing air quality data has been obtained from available sources, including local monitoring studies and national or government data sources, including the Department for Environment, Food & Rural Affairs (Defra) UK AIR, Air Information Source national pollution maps.
- 5.19.1.3 Mitigation measures proposed by the Applicants include the following.
- Construction will be undertaken in accordance with a CoCP, including best practice measures for air quality and dust management.
 - Construction to be undertaken in accordance with the Construction Traffic Management Plan.
- 5.19.1.4 Overall, it is concluded that there will be no significant effects arising from the Transmission Assets during the construction, operation and maintenance or decommissioning phases in relation to dust and construction traffic related emissions. There would also be no significant cumulative effects from dust and construction traffic related emissions arising from the Transmission Assets alongside other projects/plans and no potential transboundary impacts.
- 5.19.1.5 Given the limited predicted effects, it is considered that the Transmission Assets accord with **NPS EN-1 paragraphs 4.15.5 – 4.15.7 and 5.12.7 - 5.12.18; NPS EN-3 paragraphs 2.5.2; 2.7.40; 2.7.98; 2.7.100; 2.9.37 - 2.9.41; 2.11.7** as well as **NPS EN-5 paragraphs 2.9.37 - 2.9.38**.
- 5.19.1.6 The Transmission Assets also comply with Paragraphs 8; 109; 180 and 192 of the NPPF; Blackpool Local Plan Part 1: Core Strategy 2012-2027 Policies CS7 and CS10; Blackpool Local Plan Part 2: Site Allocations and Development Management Policies Adopted February 2023 Policies D M36; Fylde Local Plan to 2032 (incorporating Partial Review) (Adopted December 2021) Policy CL3; Preston Local Plan 2012-26 Policies AD1(a); South Ribble Local Plan 2012-2026 Policy B1 and Central Lancashire Adopted Core Strategy – Local Development Framework Policy 28.
- 5.19.1.7 The Transmission Assets benefit from the presumption in favour of consent applying to CNP infrastructure. This presumption is unaffected by any effects on air quality. A full list of compliance is included in the NPS tracker (document reference J26), the NPPF tracker (document reference J28.1) and the local policies tracker (document reference J28.3).

5.20 Landscape and visual resources

- 5.20.1.1 Volume 3, Chapter 10 of the ES (document reference F3.10) sets out the assessment of effects in relation to landscape and visual impacts. Landscape

and visual resources refer to the existing character and physical elements of the landscape, areas designated for their scenic or landscape related qualities, and views from publicly accessible locations such as settlements, transport routes, and public rights of way.

5.20.1.2 Representative viewpoints have been selected to represent a broad range of locations and sensitive visual receptors across the study area. Fieldwork was undertaken to verify the visual receptors and representative viewpoint locations and photography captured. As there are no above sea-level structures as part of the application for development consent for the Transmission Assets, seascape character and marine based visual receptors have not been considered.

5.20.1.3 Mitigation measures proposed by the Applicants include the following.

- The onshore export cables and the 400 kV grid connection cables will be completely buried underground for the entire length. No overhead pylons will be installed as part of the Transmission Assets.
- Where hedgerows and/or trees require removal, this will be undertaken prior to topsoil removal. Sections of hedgerows and trees which are removed will be appropriately mitigated for and reinstated where practicable.
- Joint bays will be completely buried, with the land above reinstated. An inspection cover will be provided on the surface for link boxes for access during operation and maintenance phase.
- Construction will be undertaken in accordance with a CoCP, including measures to maintain and address impacts on landscape and visual resources.
- An Outline Landscape Management Plan sets out details of mitigation planting at the onshore substation sites, including the location, species and details of planting and its management and maintenance. Where practicable, landscape mitigation planting will be established as early as reasonably practicable in the construction phase.
- An Outline Design Principles document includes key design details for the substation buildings.
- Construction will be undertaken in accordance with the Public Rights of Way Management Plan to minimise the disturbance to rights of way, where practicable.

5.20.1.4 A number of potential daytime and night time impacts upon landscape and visual resources associated with the construction, operation and maintenance and decommissioning phases of the Transmission Assets have been identified.

5.20.1.5 There will some temporary effects on local landscape character during the construction phase of the landfall, and onshore export cables:

- Local Character Area 19a: Coastal Dunes – Fylde Coastal Dunes.
- Local Character Area Suburban Urban – Blackpool Recreation Ground.

- 5.20.1.6 There will also be temporary effects on visual receptors during the construction to:
- people using beach.
 - people using Blackpool Recreation Ground.
 - people using a number of local rights of way.
 - people using National Cycle Route 62 at Hillock Lane.
 - occupiers of residential properties at Bridge Farm, Bridge Hall Farm, Moss Side Farm, The Old Dairy, Hillock Cross Farm, Savick Brook Farm and Marsh Farm.
- 5.20.1.7 Temporary effects on landscape character will arise during the construction phase of the onshore substations on the following character areas.
- Local Character Area 15d: Coastal Plain – Fylde.
- 5.20.1.8 Temporary effects on visual receptors during the construction phase of the onshore substations.
- Viewpoints 1, 3 and 6 (views from public rights of way).
 - Sequential effects on people using public rights of way adjacent to onshore substation sites.
- 5.20.1.9 Short term effects on landscape character at the onshore substation sites at operation in year 1, before establishment of landscape mitigation planting:
- Local Character Area 15d: Coastal Plain – Fylde.
- 5.20.1.10 Long term effects on visual receptors at the onshore substation sites at operation year 15, following establishment of landscape mitigation planting:
- Sequential effects on people using public rights of way immediately adjacent to the onshore substation sites.
- 5.20.1.11 There will be no significant long term operational effects on landscape character as a result of the Transmission Assets. The only long term significant effects on visual amenity would be effects on users of the linked public rights of way immediately adjacent and near to the Morgan and Morecambe onshore substation sites.
- 5.20.1.12 The majority of landscape and visual effects as a result of the onshore elements of Transmission Assets are considered not to be significant and those which have been identified as significant are generally related to temporary impacts during construction and early operation (year 1). Once the landscape proposals, as set out in the Outline Landscape Management Plan (document reference J2) and Outline Design Principles document (document reference J3) have become established effects would be very limited. Some long term visual effects on walkers and equestrians using public rights of way immediately adjacent to the onshore substations would occur at year 15.
- 5.20.1.13 Given the generally temporary nature of the effects identified above, it is considered that the Transmission Assets, with the mitigation in place, accords with the requirements of **NPS EN-1 paragraphs 4.6.13; 4.7.2; 4.7.6; 5.10.1; 5.10.4 - 5.10.6; 5.10.13 – 5.10.17; 5.10.19 - 5.10.22; 5.10.24 –**

5.10.28; 5.11.1; 5.11.30 – 5.11.31 as well as NPS EN-3 paragraphs 2.3.6; 2.5.2; 2.8.207; 2.8.210 - 2.8.212; 2.8.352 and NPS EN-5 paragraphs 2.2.8 – 2.2.10; 2.9.9; 2.9.18; 2.9.22; 2.9.25; 2.10.8; 2.11.2; 2.11.4 -2.11.6 and 2.14.2.

- 5.20.1.14 The Transmission Assets also comply with Paragraphs 8; 20; 135; 137; 142; 156; 160 and 180 -183 of the NPPF; UK Marine Policy Statement paragraphs 2.6.5.1 - 2.6.5.4; North West Inshore and North West Offshore Marine Plan Policies NW-CE-1; NW-CO-1; NW-SCP-1; Blackpool Local Plan Part 1: Core Strategy 2012-2027 Policy CS10; Blackpool Local Plan Part 2: Site Allocations and Development Management Policies Adopted February 2023 Policies D M21 and D M32; Fylde Local Plan to 2032 (incorporating Partial Review) (Adopted December 2021) Policy CL3, ENV1; ENV5; GD2; GD3 and GD7; Preston Local Plan 2012-26 Policy EN3; South Ribble Local Plan 2012-2026 Policy G1; G13 and G17 and Central Lancashire Adopted Core Strategy – Local Development Framework Policies 16; 21 and 28.
- 5.20.1.15 The Transmission Assets benefit from the presumption in favour of consent applying to CNP infrastructure. This presumption is unaffected by the predicted effects on landscape and visual resources. A full list of compliance is included in the NPS tracker (document reference J26), the NPPF tracker (document reference J28.1) and the local policies tracker (document reference J28.3).

5.21 Aviation and radar

- 5.21.1.1 Volume 3, Chapter 11 of the ES (document reference F3.11) sets out the assessment of effects in relation to aviation and radar. Aviation and radar refers to the stakeholders/receptors that operate in the UK and international airspace, interacting with each other, the air traffic management provided and the relationship/effects of the physical environment.
- 5.21.1.2 The aviation receptors around the Transmission Assets have been characterised via a desk study utilising UK and international aviation guidance material and site-specific study of regional aviation and stakeholder engagement.
- 5.21.1.3 The information on aviation and radar was collected through detailed review of existing guidance and datasets. This included defining Military Practice and Exercise Areas, aerodromes, flight procedures, other aviation communications, navigation and surveillance infrastructure, helicopter main route indicators and other low flying operations such as Ministry of Defence and helicopter search and rescue activities.
- 5.21.1.4 Several discrete operators utilise the airspace around the Transmission Assets. The Transmission Assets Onshore Order Limits encompass Blackpool Airport and are located within 15 km of the boundary of Warton Aerodrome.
- 5.21.1.5 Mitigation measures proposed by the Applicants includes the following.
- No construction works within the operational (i.e. airside) boundary of Blackpool Airport will commence until the Civil Aviation Authority has approved and inspected the works.

- 5.21.1.6 With the mitigation measure in place there will be no significant effects arising from the Transmission Assets during the construction, operation and maintenance or decommissioning phases. It is concluded that there will be no significant cumulative effects from the Transmission Assets alongside other projects/plans.
- 5.21.1.7 Once mitigation is accounted for, effects are not considered to be significant therefore the Transmission Assets accord with the requirements of **NPS EN-1 paragraphs 5.5.1; 5.5.5; 5.5.10; 5.5.11; 5.5.34; 5.5.37; 5.5.39 - 5.5.40; 5.5.44; 5.5.49 and 5.5.53 as well as NPS EN-3 paragraphs 2.8.50 and 2.8.40 and NPS EN-5 paragraph 2.10.14.**
- 5.21.1.8 The Transmission Assets also comply with Paragraph 217 of the NPPF and Fylde Local Plan to 2032 (incorporating Partial Review) (Adopted December 2021) Policies T2; T3 and CL3.
- 5.21.1.9 The Transmission Assets benefit from the presumption in favour of consent applying to CNP infrastructure. This presumption is unaffected by the potential effects on aviation and radar. A full list of compliance is included in the NPS tracker (document reference J26), the NPPF tracker (document reference J28.1) and the local policies tracker (document reference J28.3).

5.22 Climate change

- 5.22.1.1 Volume 4, Chapter 1 of the ES (document reference F4.1) sets out the assessment of effects in relation to climate change. Climate change in this context refers to the long-term shifts in temperatures and weather patterns that are fundamentally driven by human activities.
- 5.22.1.2 The assessment considers the impacts and effects of the Transmission Assets on climate change during the construction, operation and maintenance and decommissioning phases.
- 5.22.1.3 The greenhouse gas emissions arising from the Transmission Assets have been characterised by a series of desk-based assessments and articles using published data to determine both the impact of the Transmission Assets on climate change and the impact of climate change on the Transmission Assets. The potential risks to the Transmission Assets from a changing climate have also been assessed.
- 5.22.1.4 Mitigation measures proposed by the Applicants include the following.
- The Greenhouse Gas Reduction Strategy outlines options to reduce construction-related emissions.
- 5.22.1.5 The purpose of the Transmission Assets is to connect the Morgan Offshore Wind Project and Morecambe Offshore Windfarm to the National Grid. This will contribute to:
- the UK Government's ambition to deliver 50 GW of offshore wind by 2030;
 - delivering much needed investment and securing construction and operations jobs in the UK;
 - securing our energy supply; and

- the UK's response to the climate change crisis.

- 5.22.1.6 The projects, therefore, have an important part to play in securing the timely delivery of the Government's renewable energy strategy and achieving legally binding emissions reduction targets.
- 5.22.1.7 Further details of the need for the Morgan Offshore Wind Project, the Morecambe Offshore Windfarm and the Transmission Assets are provided in **section 4**.
- 5.22.1.8 The Transmission Assets would enable the use of the renewable electricity generated by the Generation Assets through providing the connection to the National Grid for these two nationally significant offshore wind farms. This allows the displacement of fossil fuels which would lead to a significant beneficial effect.
- 5.22.1.9 Overall, it is concluded that there will be a significant beneficial cumulative effect from the Transmission Assets, when considered together with the Generation Assets. This arises from the generation of renewable energy by the two offshore wind farms, leading to avoidance of emissions due to the displacement of higher emitting electricity generation sources.
- 5.22.1.10 The Transmission Assets and the Generation Assets would therefore contribute to meeting the national renewable energy and climate change policy and international obligations set out in **sections 3 and 4** of this Planning Statement. Overall, the Transmission Assets comply with **NPS EN-1 paragraphs 3.5.1; 4.10.5 - 4.10.19; 5.3.4 - 5.3.12; NPS EN-3 section 1.6 and paragraph 2.4.8 and NPS EN-5 paragraphs 2.3.2 and 2.3.3**.
- 5.22.1.11 The Transmission Assets also comply with the aims and requirements of Paragraphs 157 and 159 of the NPPF; the North West Inshore and North West Offshore Marine Plan Policies NW-CC-2 and NW-AIR-1; Blackpool Local Plan Part 1: Core Strategy 2012-2027 Goal 1; Fylde Local Plan to 2032 (incorporating Partial Review) (Adopted December 2021) Goal 1 and 2; Preston Local Plan 2012-26 Policy 28; South Ribble Local Plan 2012-2026 Core Strategy objectives and Central Lancashire Adopted Core Strategy – Local Development Framework Policy 28.
- 5.22.1.12 The Transmission Assets benefit from the presumption in favour of consent applying to CNP infrastructure. This presumption is supported by the cumulative beneficial effects on climate change. A full list of compliance is included in the NPS tracker (document reference J26), the NPPF tracker (document reference J28.1) and the local policies tracker (document reference J28.3).

5.23 Socio-economics

- 5.23.1.1 Volume 4, Chapter 2 of the ES sets out the assessment of effects in relation to socio-economics. It addresses effects on the economy (including employment), housing and tourism. The assessment of the potential impact of the Transmission Assets on socio-economics considered the following categories.

- Economic: assessing the potential employment and Gross Value Added (GVA) impacts associated with Transmission Assets and the associated impacts on local employment opportunities. Also considered were the potential economic impact of changes to aviation activities (at Blackpool Airport and Blackpool Airport Enterprise Zone)>
- Social: assessing the potential impacts of the workforce associated with the Transmission Assets on housing, accommodation and population (including local services).
- Tourism: assessing the potential indirect impacts associated with visual amenity, overnight accommodation and recreation on tourism.

- 5.23.1.2 The socio-economics impact assessment considers the local economies and populations which are located at a number of spatial levels that might be affected by the Transmission Assets. This includes the areas closest to offshore and onshore activities as well as other important locations that may be used to support the construction, operation and maintenance and decommissioning activities related to the Transmission Assets (e.g., laying cables offshore, installing onshore substation etc.). These areas are primarily related to the regions where potential support facilities (i.e., ports) within the relevant spatial levels are located and the onshore substation which will be located at Penwortham.
- 5.23.1.3 Information on socio-economics within the study area was collected through desktop review.
- 5.23.1.4 Mitigation measures proposed by the Applicants includes the following.
- Employment and Skills Plan(s) will detail how the Applicants will engage with local workers and training providers for anticipated employment opportunities associated with the Transmission Assets.
- 5.23.1.5 The assessment has taken into consideration the measures within the Outline Skills and Employment Plan (document reference J10) included in the application. The actions presented within the Outline Plan will form the basis of a post-consent Skills and Employment Plan, which will be adopted by the Applicants to help develop and support the economic benefits associated with the Transmission Assets in relation to skills and employment within the offshore wind sector.
- 5.23.1.6 There will be no significant effects arising from the Transmission Assets during the construction, operation and maintenance or decommissioning phases and no potential transboundary impacts have been identified in regard to effects of the Transmission Assets.
- 5.23.1.7 The effects identified are considered to be beneficial. There will be significant beneficial cumulative effects during construction, operation and maintenance on economic receptors including employment and Gross Value Added.
- 5.23.1.8 The Transmission Assets and Generation Assets would therefore contribute to improve socio-economic factors which complies with **NPS EN-1 paragraphs 4.1.5; 4.3.4; 4.3.5; 4.3.12; 5.5.5; 5.5.52; 5.13.2 - 5.13.12 and NPS EN-5 paragraph 2.3.12.**

- 5.23.1.9 The Transmission Assets also comply with Paragraphs 8; 11c; 85;87;157 and 160b of the NPPF; North West Inshore and North West Offshore Marine Plan Policies NW-REN-1; NW-EMP-1; NW-TR-1; NW-CE-1 and NW-INF-1; Fylde Local Plan to 2032 (incorporating Partial Review) (Adopted December 2021) Policies NP1; EC2; CL3; EC4(a); T3 and Central Lancashire Adopted Core Strategy – Local Development Framework Policies 15 and 28.
- 5.23.1.10 The Transmission Assets benefit from the presumption in favour of consent applying to CNP infrastructure. This presumption is supported by the potential beneficial effects resulting from socio-economic elements. A full list of compliance is included in the NPS tracker (document reference J26), the NPPF tracker (document reference J28.1) and the local policies tracker (document reference J28.3).

5.24 Green Belt and development in the countryside

- 5.24.1.1 Elements of the Transmission Assets run through areas of Green Belt and the two onshore substations are proposed to be located within Green Belt land as defined in relevant local policies, shown on **Figure 5.1**. It is noted that although close to the 'Areas of Separation' designation contained within Fylde Local Plan to 2032, no element of the Transmission Assets would cross or affect this designation. It is further noted that the Preliminary Environmental Information Report boundary was within the Kirkham and Newton Area of Separation. Changes to the scheme design have removed the Transmission Assets Order Limits outside of this Area. As such, no additional assessment of this policy is included within this section.
- 5.24.1.2 When referring to the Green Belt, paragraph 152 of the NPPF confirms that inappropriate development is by definition harmful to the Green Belt and should only be approved in very special circumstances.
- 5.24.1.3 Paragraph 153 of the NPPF requires substantial weight to be given to any harm to the Green Belt in the determination of planning applications, and that '*very special circumstances*' will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, '*is clearly outweighed by other considerations*'.
- 5.24.1.4 Paragraph 154 of the NPPF confirms that local planning authorities should regard the construction of new buildings as inappropriate development in the Green Belt, subject to seven specific exceptions. The proposal includes the construction of two onshore substations within the Green Belt.
- 5.24.1.5 Paragraph 155 of the NPPF goes on to confirm six forms of development that are not inappropriate in the Green Belt, provided they preserve its openness and do not conflict with the purposes of the inclusion of the land within it.
- 5.24.1.6 Of those six forms of development, underground cabling, which would partly traverse sections of the Green Belt within Fylde Council can be considered to constitute '*b) engineering operations*'. However, as cable installation works would be temporary and the cables are in connection with two offshore wind farms and two onshore substations, the latter of which will be located within the Green Belt, an overall case for very special circumstances is provided with this application for development consent.

- 5.24.1.7 Paragraph 5.11.22 of NPS EN-1 confirms that applicants 'may be able to demonstrate that energy infrastructure, such as an underground pipeline, may be considered as an engineering operation and regarded as not inappropriate in the Green Belt'.
- 5.24.1.8 In addition, NPS EN-1 paragraph 5.11.37 confirms that the Secretary of State should ensure that 'substantial weight is given to any harm to the Green Belt when considering any application for such development, while taking account, in relation to renewable and linear infrastructure, of the extent to which its physical characteristics are such that it has limited or no impact on the fundamental purposes of Green Belt designation'.
- 5.24.1.9 Regardless of the fact that engineering operations are not inappropriate in the Green Belt, it is acknowledged that the proposed construction of two onshore substations in the Green Belt does not fall under the exceptions of Paragraph 155 of the NPPF.
- 5.24.1.10 The Transmission Assets are considered to benefit from the presumptions given to CNP infrastructure as evidenced in **section 3.4.4**, in particular as they are of the type to be considered to be CNP infrastructure in paragraphs 4.2.4 and 4.2.5 of NPS EN-1.

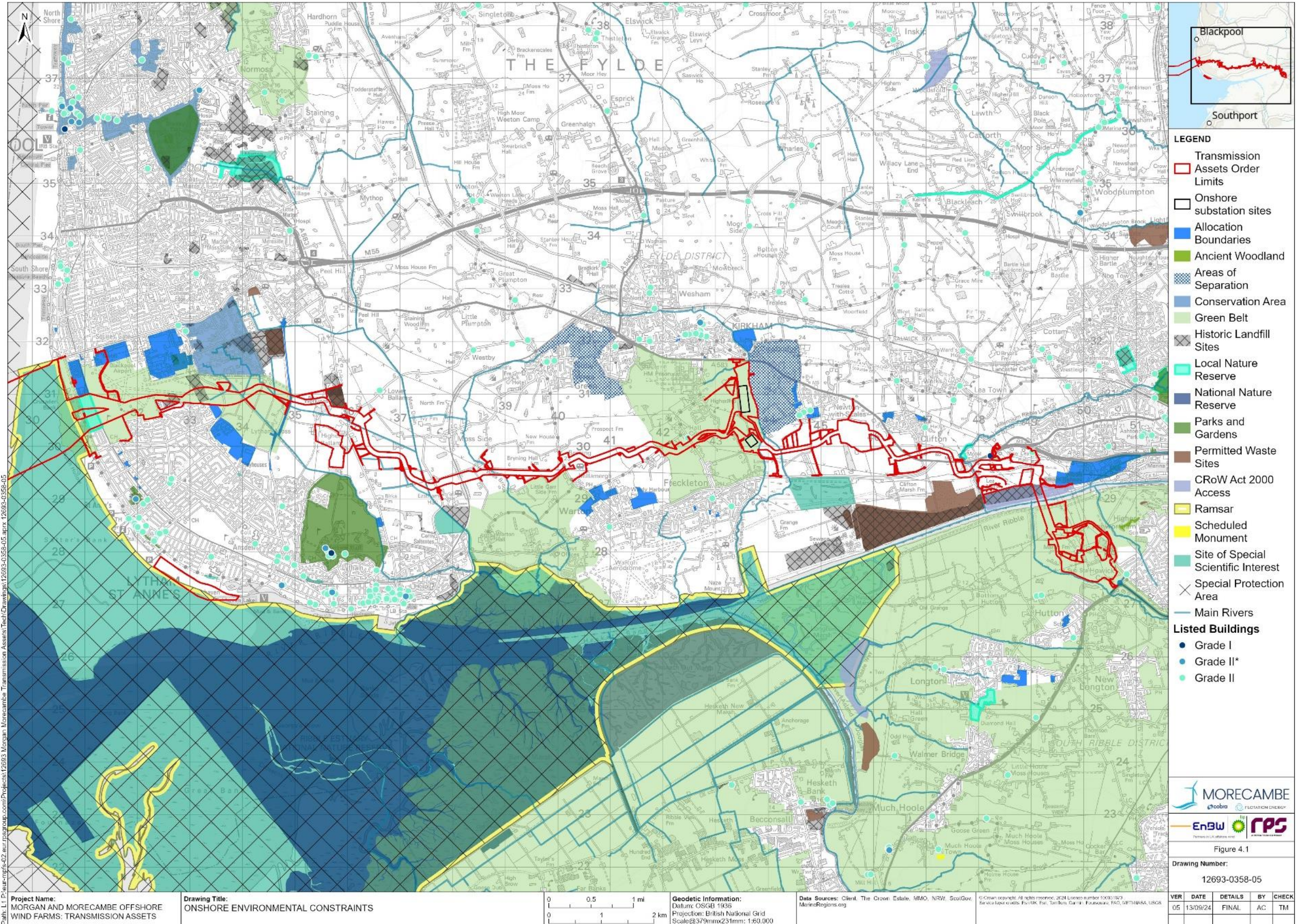


Figure 5.1: Onshore environmental constraints
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- 5.24.1.11 As such, and as assessed and demonstrated in **section 6.2** below, the starting point for decision-making by the Secretary of State is that CNP infrastructure is to be treated as if it has met any tests which are set out within the NPPs, or any other planning policy, which requires a clear outweighing of harm, exceptionality, or very special circumstances.
- 5.24.1.12 As they benefit from the presumptions which apply to CNP infrastructure, therefore, the Transmission Assets meet the requirements for very special circumstances to allow development in the Green Belt. This means that matters of openness or justification regarding the impact on the purposes of including land into the Green Belt are not required, as the need for CNP infrastructure outweighs the harm to the Green Belt by reason of inappropriateness and any other harm.
- 5.24.1.13 Paragraph 3.3.63 of NPS EN-1 also defines that CNP infrastructure should be progressed as soon as possible, as there is an ‘*urgent need*’ (paragraphs 3.2.6 and 3.2.7 of NPS EN-1) for this type of development, which also applies to developments directed to the development consent process as a result of a section 35 direction (paragraphs 3.3.65 to 3.3.83 of NPS EN-1) meaning substantial weight must be attributed to CNP proposals for low carbon infrastructure.
- 5.24.1.14 In addition, it is further noted that paragraph 156 of the NPPF also acknowledges that, ‘When located in the Green Belt, elements of many renewable energy projects will comprise inappropriate development. In such cases developers will need to demonstrate very special circumstances if projects are to proceed. Such very special circumstances may include the wider environmental benefits associated with increased production of energy from renewable sources.’
- 5.24.1.15 The assessment and balance presented in **section 6** presents the benefits resulting from the Transmission Assets which include the significant beneficial impacts as a result of energy transmission from renewable sources and therefore it is put forward that, even if the proposal is not considered to be CNP, very special circumstances do indeed exist to outweigh the harm to Green Belt by reason of inappropriateness and any other harm.

5.25 Holistic network review and site selection

- 5.25.1.1 As set out in **section 2**, both the Morgan Offshore Wind Project and the Morecambe Offshore Windfarm were scoped into the ‘Pathways to 2030’ workstream under the OTNR. The OTNR aims to consider, simplify, and wherever possible facilitate a collaborative approach to offshore wind projects connecting to the UK electricity transmission network.
- 5.25.1.2 A number of potential grid connection locations and options were considered by NGESO, based on an understanding of the grid infrastructure capacity in relation to the Generation Assets. Whilst the decision regarding the point of interconnection ultimately sits with NGESO, Morgan OWL and Morecambe OWL (the Applicants) engaged with NGESO throughout the process to understand the proposed solutions for connection of the Generation Assets to the grid and to provide input on environmental and consenting constraints for the point of interconnection under consideration.

- 5.25.1.3 In July 2022, the UK Government published the ‘Pathway to 2030 Holistic Network Design’ documents, which set out the approach to connecting 50 GW of offshore wind to the National Grid (NGESO, 2022). A key output of the HNDR process was the recommendation that the Morgan Offshore Wind Project and the Morecambe Offshore Windfarm should work collaboratively in connecting the offshore two wind farms to the electricity transmission network at Penwortham in Lancashire. This point of interconnection was identified by NGESO as representing the optimal location considering a range of criteria (i.e., technical, cost, environmental and deliverability factors).
- 5.25.1.4 Morgan OWL and Morecambe OWL (the Applicants), being in agreement with the output from the HNDR, are jointly seeking a single consent for their electrically separate transmission assets comprising aligned offshore export cable corridors to landfall and aligned onshore export cable corridors to separate onshore substations (and associated infrastructure), and onward connection to the National Grid at Penwortham, Lancashire.
- 5.25.1.5 The HNDR process has therefore been integral to the application, taking into account the following.
- Section 2.13 of NPS EN-5 outlines that in preparing applications for offshore-onshore transmission there should be consideration of strategic network design (including the outcomes of the HNDR). These outcomes have been fully adopted by the Applicants in terms of the design of the Transmission Assets to accommodate the point of interconnection at p Penwortham.
 - Section 2.13 of NPS requires that a coordinated approach to design should be adopted. Radial offshore transmission options to single windfarms should only be proposed where options assessment work identifies that a co-ordinated solution is not feasible. Section 2.13 of the NPS confirms policy support for a coordinated approach. This approach has been adopted by Morgan OWL and Morecambe OWL for the Transmission Assets, culminating in a single application for development consent for the transmission infrastructure for both offshore wind farms.
- 5.25.1.6 The Applicants have undertaken a site selection process based on the output of the HNDR process to identify the location and refine the design of the key elements of the Transmission Assets, including through early engagement with a range of stakeholders. The aim was to identify locations and routes (for the offshore export cable corridor, landfall location, onshore cable corridors and onshore substations) that were environmentally acceptable, deliverable and consentable, whilst also enabling the benefits in the long term of the lowest energy cost to be passed to the consumer. Details of this are presented in Volume 1, Chapter 4: Site selection and alternatives of the ES (document reference F1.4).

5.26 HRA and MCZ assessments

5.26.1 Overview

- 5.26.1.1 NPS EN-1 (paragraph 4.2.18) sets out that any HRA or MCZ impacts associated with CNP infrastructure will continue to be considered under the

framework set out in the Habitats Regulations and the Marine and Coastal Access Act 2009 respectively.

5.26.2 HRA

- 5.26.2.1 A HRA Stage 1 Screening Report (document reference E3) and an ISAA report (document references E2.1, 2.2, 2.3) has been produced, setting out the findings of the HRA process undertaken for the Transmission Assets to ensure compliance with the Habitats Regulations.
- 5.26.2.2 Parts 2 (document reference: E2.2) and 3 (document reference: E2.3) of the ISAA consider whether the Transmission Assets could have adverse effects, either alone or in-combination with other plans or projects, on the integrity of 25 designated European sites and three Ramsar sites for which the potential for likely significant effects could not be excluded in the HRA Stage 1 Screening Report (document reference: E3).
- 5.26.2.3 The ISAA assesses the environmental effects resulting from the Transmission Assets. An assessment of adverse effects of the Transmission Assets alone and in-combination has been carried out against the conservation objectives for each relevant European site screened into the assessment. This assessment has taken account of the best available baseline information and has been undertaken in view of the measures adopted as part of the Transmission Assets to mitigate the potential for adverse effects.
- 5.26.2.4 The consideration of the potential for adverse effects on the integrity of European sites has been made with reference to the overall ecological functions and the lasting preservation of the constitutive characteristics of the sites.
- 5.26.2.5 The assessment set out in Parts 2 and 3 of the ISAA concludes that there would be no adverse effect on the integrity of any of the designated sites assessed, either from the Transmission Assets alone, or in combination with other plans and projects.
- 5.26.2.6 Therefore, although NPS EN-1 acknowledges that CNP infrastructure can be capable of amounting to imperative reasons of overriding public interest for HRA, this test is not required to be met for the Transmission Assets, which meet the requirements of the Habitats Regulations and **NPS EN-1, paragraphs 4.2.18 to 4.2.22** in terms of HRA.

5.26.3 MCZ

- 5.26.3.1 With respect to MCZ assessment, the MCZ screening and stage 1 assessment report (document reference E4) has identified a single MCZ, the Fylde MCZ, with the potential to be significantly impacted by the construction, operation and maintenance, and decommissioning phases of the Transmission Assets. The Fylde MCZ was therefore carried through to a MCZ Stage 1 assessment for a full assessment against the relevant conservation objectives in relation to the potential direct and indirect impacts arising from the construction, operation and maintenance, and decommissioning phases of the Transmission Assets.

- 5.26.3.2 This MCZ Stage 1 assessment considered the effects of the Transmission Assets the construction, operation and maintenance, and decommissioning phases on the subtidal sand and subtidal mud protected features of the Fylde MCZ (subtidal sand and subtidal mud). This included consideration of effects on attributes and targets of the relevant protected features, and subsequently on the conservation objectives.
- 5.26.3.3 Based on the information presented in section 1.8 of the MCZ screening and stage 1 assessment report, which includes assessments on the relevant broadscale habitats of the Fylde MCZ (i.e., subtidal sand and subtidal mud), it is concluded that the conservation objective of maintaining the subtidal sand and subtidal mud protected features of the Fylde MCZ in a favourable condition will not be hindered by the construction, operation and maintenance, and decommissioning phases of the Transmission Assets in isolation, or cumulatively with any other plan, project or activity.
- 5.26.3.4 As no significant risks to the achievement of the Fylde MCZ conservation objectives have been identified in the MCZ Stage 1 assessment, a Stage 2 assessment is not required.
- 5.26.3.5 Therefore, although NPS EN-1 acknowledges that for CNP infrastructure the benefit to the public is capable of outweighing the risk of environmental damage, this test is not required to be met for the Transmission Assets, which meet the requirements of **NPS EN-1, paragraphs 4.2.18 to 4.2.22** in terms of MCZ assessment.

5.27 Other planning considerations

- 5.27.1.1 The site selection process reported in Volume 1, Chapter 4: Site selection and consideration of alternatives of the ES (document reference F1.4) has taken into account the site allocations within Blackpool Local Plan Part 1: Core Strategy 2012-2027; Blackpool Local Plan Part 2: Site Allocations and Development Management Policies Adopted February 2023; Fylde Local Plan to 2032 (incorporating Partial Review); Preston Local Plan 2012-26; South Ribble Local Plan 2012-2026 and Central Lancashire Adopted Core Strategy – Local Development Framework and sought to avoid any allocations within the selected landfall, cable route and substation locations.
- 5.27.1.2 In particular, the allocations designated in the Fylde Local Plan 2032 (incorporating Partial Review) were reviewed and accounted for. None of these, including the allocations for transport infrastructure (such as the M55 to Heyhouses (St Annes) Link Road under Policy T1) would be sterilised by the Transmission Assets.
- 5.27.1.3 Impacts upon Blackpool Airport Enterprise Zone Masterplan were not only taken into account as part of the site selection process but are also identified within Volume 4, Chapter 2: Socio-economics of the ES (document reference F4.2) in particular regarding Blackpool Airport and the Enterprise Zone. This assessment concluded that the impacts on Blackpool Airport's operations are anticipated to be entirely reversible and not significant.

6 Balance of considerations and overall conclusions

6.1 Overview

6.1.1.1 Following a request from the Applicants, on 4 October 2022 the Secretary of State issued a direction under section 35 of the Planning Act 2008 (document reference J24) that the Transmission Assets should be treated as 'development for which development consent is required'. Applications for development consent under the Planning Act 2008 are submitted to and examined by the Planning Inspectorate and determined by the relevant Secretary of State.

6.1.1.2 Section 104(3) of the Planning Act 2008 states that the Secretary of State should decide such applications in accordance with relevant NPSs, with the fundamental test to be applied in the decision-making process being whether, on balance, the project is in accordance with the relevant NPSs.

~~6.1.1.3 For completeness, as set in paragraphs 3.4.1.10 and 3.4.1.12, the Applicants are of the view that even if the application was to be assessed under s105(2)(b) 'any matters prescribed in relation to development of the description to which the application relate' would direct the Secretary of State to determine the application based on NPS EN1, EN3 and EN5 as these are considered to be highly relevant and important policy related to the matters prescribed in this DCO application.~~

~~6.1.1.4 Therefore, the Applicants are of the position that, regardless of the application being determined under section 104 or section 105 of the Planning Act 2008, NPS EN 1, EN 3 and EN 5 are the primary policy documents for decision-making.~~

~~6.1.1.5~~ 6.1.1.3 This Planning Statement has set out the background to and the context for the Transmission Assets, as well as the legal and policy framework it should be assessed against. It includes a description of the need for the Transmission Assets and the outcomes of the EIA, HRA and MCZ assessment processes, including both beneficial and adverse effects.

~~6.1.1.6~~ 6.1.1.4 This section summarises the need for the Transmission Assets, together with its wider benefits, and weighs those against any adverse effects identified through the environmental assessment work that has been undertaken.

~~6.1.1.7~~ 6.1.1.5 This balancing exercise considers the context of national, UK and international policies and obligations that seek to tackle climate change, deliver security of the UK's energy supply and promote the necessary shift to renewable energy as well as accordance with national and local planning policy.

6.2 Project need and benefits

6.2.1.1 As established in **section 4** of this Planning Statement, the Transmission Assets are considered to benefit from the presumptions given to CNP for low carbon infrastructure, as set out in paragraph 4.24 of NPS EN-1. Paragraph 4.2.5 of NPS EN-1 confirms that energy transmission projects directed to be

considered under the Planning Act 2008 under a section 35 direction (as is the case for the Transmission Assets) constitute CNP infrastructure.

- 6.2.1.2 By definition, CNP infrastructure would make a significant contribution to meeting a national need, in accordance with policy set out in Part 3 of NPS EN-1 and sections 1.6 and 2.7 of NPS EN-5. In addition, and as stated in the section 35 direction (document reference J24), the Transmission Assets would also allow for the deployment of the Generation Assets, connecting two nationally significant offshore wind farms to the UK electricity transmission network, which would result in significant beneficial effects in terms of the UK's commitments to achieve net zero by 2050.
- 6.2.1.3 From a national policy context, the need for the Transmission Assets as a proposal benefiting from the presumptions which apply to CNP infrastructure is confirmed by NPS EN-1, with additional support confirmed in NPS EN-3 and NPS EN-5, as the Transmission Assets would provide a coordinated approach to the delivery of energy transmission infrastructure to improve the resilience of the existing network and unlocks the transmission of offshore energy into the National Grid.
- 6.2.1.4 Part 3 of NPS EN-1 outlines the urgent need for all types of energy infrastructure in order to achieve energy security and dramatically reduce GHG emissions (paragraphs 3.1.1 and 3.3.63).
- 6.2.1.5 When determining applications for energy transmission infrastructure, this should be done on the basis that the Government has demonstrated that there is a need for this type of infrastructure and, subsequently, substantial weight should be given to the contribution these projects would make towards satisfying this need.
- 6.2.1.6 In particular, paragraph 3.3.62 of NPS EN-1 states that the Government '*... has concluded that there is a critical national priority (CNP) for the provision of nationally significant low carbon infrastructure*' including offshore wind and associated transmission infrastructure which can strengthen the overall electricity network to support the delivery of generating assets.
- 6.2.1.7 Part 3 also explains that without significant amounts of new large-scale energy infrastructure, the Government's energy and climate change objectives cannot be fulfilled and this will not be possible without some significant residual adverse effects (paragraph 3.1.2).
- 6.2.1.8 Paragraphs 3.3.62 and 4.2.4 of NPS EN-1 confirm that the Government '*... has concluded that there is a critical national priority (CNP) for the provision of nationally significant low carbon infrastructure.*'
- 6.2.1.9 Importantly, in relation to CNP infrastructure, paragraph 3.3.63 of NPS EN-1 reaffirms the Government's approach to addressing the urgent need for such projects, like Transmission Assets, and goes further by stating that:

'Subject to any legal requirements, the urgent need for CNP Infrastructure to achieving our energy objectives, together with the national security, economic, commercial, and net zero benefits, will in general outweigh any other residual impacts not capable of being addressed by application of the mitigation hierarchy. Government strongly supports the delivery of CNP

Infrastructure and it should be progressed as quickly as possible. (our emphasis underlined).

- 6.2.1.10 The strengthened presumption in favour of CNP infrastructure also confirms that *'where non-HRA or non-MCZ impacts remain after the mitigation hierarchy has been applied, these residual impacts are unlikely to outweigh the urgent need for this type of infrastructure'* and *'... in all but the most exceptional circumstances, it is unlikely that consent will be refused on the basis of these residual impacts'*(paragraph 4.2.15).
- 6.2.1.11 In this regard the starting point for decision-making is that CNP infrastructure is to be treated as if it has met any tests which are set out within the NPSs, or any other planning policy, which requires a clear outweighing of harm, exceptionality, or very special circumstances. This includes development affecting SSSIs, development in the Green Belt, development in nationally designated landscapes and where there is substantial harm to or loss of significance to heritage assets (paragraphs 4.2.16 and 4.2.17).
- 6.2.1.12 This need is further confirmed in wider international and national governmental obligations and objectives relating to low carbon electricity generation, climate change and the economy including the UK Climate Change Act 2008 and the UK's Energy Security Strategy (BEIS and Prime Minister's Office, 2022).
- 6.2.1.13 Further, it has more recently been re-enforced by agreements made at COP28 in November 2023 whereby the Global Renewables and Energy Efficiency Pledge, with endorsement from 130 national governments, now stipulates that signatories commit to work together to triple the world's installed renewable energy generation capacity to at least 11,000 GW by 2030 (United Nations, 2024).
- 6.2.1.14 In addition, the Transmission Assets:
- would make a contribution towards the UK's part in meeting the recently agreed COP28 Global Renewables and Energy Efficiency Pledge to triple the world's installed renewable energy generation capacity by 2030;
 - would contribute towards the British Energy Security Strategy's target of 50 GW of offshore wind by 2030, as set out in the UK Government's 2022 Energy Security Statement;
 - would assist in meeting the UK Government's target in the Climate Change Act of 'net zero' greenhouse gas emissions for the year 2050 (i.e., to be 100% lower than the 1990 levels) in order to meet its obligations under international climate change agreements;
 - would assist in meeting future increases in electricity demand as significant sectors of energy demand switch from being powered by fossil fuels to using electricity;
 - would result in significant beneficial effects in terms of the cumulative assessment on climate change; and
 - would result in beneficial effects from increase on GVA.

- 6.2.1.15 Specifically in relation to need, NPS EN-1 confirms that the Transmission Assets should be considered on the basis that the Government has demonstrated that there is a need for renewable energy infrastructure, that the scale of the need is significantly in excess of what is currently being promoted and that the need for renewable energy is urgent (paragraphs 3.1.1, 3.2.6 and 3.5.58 of EN-1).
- 6.2.1.16 Furthermore, as recently emphasised in the designated NPSs, this urgent need for low carbon energy infrastructure means that this is CNP infrastructure (paragraph 3.3.62 of NPS EN-1).
- 6.2.1.17 Accordingly, substantial weight should be given to the beneficial contribution that the Transmission Assets would make towards satisfying this need (paragraph 3.2.7 of EN-1).
- 6.2.1.18 Importantly, in relation to CNP infrastructure, paragraph 3.3.63 of NPS EN-1 not only stresses the urgent need for such projects by confirming that the need *‘will in general outweigh any other residual impacts not capable of being addressed by application of the mitigation hierarchy’* but also reiterates that the Government strongly supports the delivery of CNP infrastructure and it should be progressed as quickly as possible.

6.3 Project impacts

- 6.3.1.1 The submitted ES (document reference F1 to F4) sets out the baseline environmental information and environmental impacts predicted to arise from the Transmission Assets. A range of mitigation is proposed as part of the application for development consent, and details are presented in the Commitments Register (document reference F1.5.3). Of relevance, the following effects were identified.
- The majority of ecological effects have been avoided or mitigated. Some residual effects in terms of ecology and nature conservation would remain as a result of the partial loss of Mill Brook Valley BHS. However, in accordance with the Onshore Biodiversity Benefit Statement (document reference J11), there would also be some potential for long term benefits associated with onshore biodiversity, specifically, the onshore substations, associated access tracks and biodiversity benefit area at Lea Marsh Fields.
 - There would be temporary impacts during construction on a range of receptors, including visual receptors and users of public rights of way.
 - There would be a permanent loss of best and most versatile agricultural land.
 - There would be long term effects on visual amenity for equestrians and walkers using the linked public rights of way immediately adjacent and near to the Morgan and Morecambe onshore substation sites.

6.4 Consideration of the planning balance and conclusion

- 6.4.1.1 NPS EN-1 paragraph 3.3.62 defines that there is a critical national need for nationally significant low carbon energy infrastructure projects, which

includes energy transmission projects like the Transmission Assets directed to be considered under the Planning Act 2008 under a section 35 direction. The Transmission Assets, as an energy transmission CNP infrastructure project, will make a beneficial contribution to global efforts to reduce the effects of climate change and would represent a meaningful contribution achieving security of UK energy supplies by unlocking the potential for offshore wind generation from the Morgan Offshore Wind Project and the Morecambe Offshore Windfarm. As such, the Transmission Assets will make a material contribution to reducing the UK's current shortfall in meeting the policy ambition 50 GW of offshore wind electricity generation by 2030.

- 6.4.1.2 Furthermore, the Transmission Assets would have a direct economic benefit, including employment and gross value added.
- 6.4.1.3 **Section 5.24** of this Planning Statement has also demonstrated that, although the Transmission Assets would result in some degree of harm to the Green Belt, in particular within Fylde Council administrative boundary, the starting point for decision making by the Secretary of State is that they should benefit from the presumptions applying to CNP infrastructure and be treated as if it has met any tests which are set out within the NPSs, or any other planning policy, which requires a clear outweighing of harm, exceptionality or very special circumstances. This includes development within Green Belt, development affecting SSSIs, development in nationally designated landscapes and where there is substantial harm to or loss of significance to heritage assets (paragraph 4.2.17). This paragraph confirms that CNP infrastructure projects are considered to have demonstrated that any exceptionality tests, in this case 'very special circumstances' to approve development in the Green Belt, have been met.
- 6.4.1.4 However, it is noted that, for CNP infrastructure, NPS EN-1 paragraphs 4.2.10 to 4.2.12 confirm that applicants must continue to show how their application meets the requirements of the NPSs in terms of applying the mitigation hierarchy, as well as any other legal and regulatory requirements. In addition, they should seek the advice of the appropriate SNCBs or other relevant statutory bodies and demonstrate that all residual effects are those that cannot be avoided, reduced or mitigated, setting out how any mitigation or compensatory measures will be monitored and reporting agreed to ensure success.
- 6.4.1.5 The Applicants have applied the mitigation hierarchy as part of the ES (document reference F1 – F4) and have complied with all other regulatory requirements such as HRA and MCZ. A Commitments Register (document reference F1.5.3) is submitted with the application to secure mitigation or compensatory measures. In addition, the Applicants have also sought advice from appropriate SNCBs and adequate consultation and engagement has been carried out, as demonstrated by the Consultation Report (document reference E1).
- 6.4.1.6 The exceptions to the presumption of consent are set out in NPS EN-1 paragraph 4.1.7. Whilst this paragraph reiterates that the need case will outweigh the residual effects in all but the most exceptional cases, it also states that those exceptions include residual impacts onshore and offshore which present an unacceptable risk to, or unacceptable interference with,

human health and public safety, defence, irreplaceable habitats or unacceptable risk to the achievement of net zero and to unacceptable interference offshore to navigation, or onshore to flood and coastal erosion risk. None of the above exceptions apply to the Transmission Assets which means that as qualifying CNP infrastructure, the Transmission Assets benefit from the presumption that the need outweighs any residual impacts.

6.4.1.7 For all the above reasons therefore, the Examining Authority and the Secretary of State can conclude under section 104 ~~or section 105 of~~ the Planning Act 2008 that the Transmission Assets would be in accordance with relevant NPSs, as established in the NPS tracker (document reference J26). Furthermore, the Transmission Assets:

- would not lead to the UK being in breach of any of its international obligations (section 104(4);
- would not lead to the Secretary of State being in breach of any duty imposed by or under any enactment (section 104(5)); and
- would not be unlawful by virtue of any enactment (section 104(6)).

6.4.1.8 The Secretary of State can be satisfied that the above benefits of the proposed development outweigh any adverse impacts (section 104(7) and that there is no condition prescribed for deciding the application otherwise than in accordance with the relevant NPSs (section 104(8).

~~6.4.1.9 Further, it has been demonstrated that even under section 105 of the Planning Act 2008; NPS EN1, EN3 and EN5 are the relevant policy documents for the matters prescribed in this DCO application.~~

~~6.4.1.10~~ 6.4.1.9 On this basis, under the terms of section 104 ~~or section 105~~ of the Planning Act 2008, the Transmission Assets should be consented.

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