

# MORGAN AND MORECAMBE OFFSHORE WIND FARMS: TRANSMISSION ASSETS

**Annex 5.10 to the Applicants response to Hearing Action Points: ISH1  
52**



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## Glossary

Term	Meaning
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).
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.
Morecambe OWL	Morecambe Offshore Windfarm Ltd is a joint venture between Zero-E Offshore Wind S.L.U. (Spain) (a Cobra group company) (Cobra) and Flotation Energy Ltd.
Morgan and Morecambe Offshore Wind Farms: Transmission Assets	<p>The offshore export cables, landfall, and onshore infrastructure for the Morgan Offshore Wind Project and the Morecambe Offshore Windfarm. 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.</p> <p>Also referred to in this report as the Transmission Assets, for ease of reading.</p>
Morgan OWL	Morgan Offshore Wind Limited is a joint venture between bp Alternative Energy Investments Ltd. and Energie Baden-Württemberg AG (EnBW).
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.

## Acronyms

Acronym	Meaning
DCO	Development Consent Order

## Units

Unit	Description
km	Kilometres
km <sup>2</sup>	Kilometres squared
m	Metres
m <sup>2</sup>	Metres squared
m <sup>3</sup>	Metres cubed

# 1 Effects on local business and tourism

## 1.1 Introduction

1.1.1.1 This Appendix provides the Applicants' response to Hearing Action Point 52 under Agenda Item 6(i) of the Issue Specific Hearing 1 (ISH):

*Provide a note explaining why a more localised report limited to the Fylde area is not necessary. Additionally, how the applicants' assessment of the potential impact on tourism on the extended area of the northwest of England as set out within Volume 4, Chapter 2: Socioeconomics of the Environmental Statement (APP-141) is applicable and whether this accords with The Infrastructure Planning (EIA) Regulations 2017. Reconsider the assessment that the impact on tourism during construction and operation is "negligible" when the area covered is so wide rather than being focused on the local area.*

1.1.1.2 The response considers:

- Regulatory requirements with respect to assessing potential socio-economic (including tourism) effects (**section 1.2**).
- The scope of the assessment set out within ES Volume 4, Chapter 2: Socio-economics (APP-141) in terms of study area identification (guidance, previous examples, data availability, and stakeholder responses) (**section 1.3**)
- Evidence of interactions between offshore wind projects and tourism (**section 1.4**).
- Identification of potential impacts on tourism, including consideration of visual amenity and recreation (**section 1.5**).
- Summary of the assessment of potential significant effects on the visitor economy (**section 1.6**).

## 1.2 Regulation requirements

1.2.1.1 Regulation 5(2) of the Infrastructure Planning (EIA) Regulations 2017 sets out the matters that are required to be included within an Environmental Impact Assessment (EIA). This does not include a requirement to assess potential significant effects on tourism, specifically.

1.2.1.2 The requirement for an assessment to consider potential effects on tourism is established by paragraph 5.13.4 of NPS EN-1. This requires that an assessment should consider all relevant socio-economic impacts, which may include (emphasis added):

- the creation of jobs and training opportunities
- the contribution to the development of low-carbon industries
- the provision of additional local services and improvements to local infrastructure, including the provision of educational and visitor facilities

- any indirect beneficial impacts for the region hosting the infrastructure
- **effects (positive and negative) on tourism and other users of the area impacted**
- the impact of a changing influx of workers during the different construction, operation and decommissioning phases
- cumulative effects

1.2.1.3 The requirement to consider potential effects on tourism has been met through the assessment of potential effects on tourism (or the ‘visitor economy’) as set out within ES Volume 4, Chapter 2: Socio-economics (APP-141).

1.2.1.4 The Infrastructure Planning (EIA) Regulations 2017, Schedule 3, Paragraph 3(a) sets out a requirement to take account of ‘the magnitude and spatial extent of an impact (for example geographical area and size of the population likely to be affected)’.

1.2.1.5 This requirement has been met through the assessment of potential effects on the ‘visitor economy’ as set out within ES Volume 4, Chapter 2: Socio-economics (APP-141).

1.2.1.6 The approach taken to assessing potential effects on tourism, including the spatial scale considered, is consistent with the EIA undertaken for other recent offshore wind energy applications consented in English and Welsh waters, including:

- Rampion 2 (development consent granted April 2025).
- Sheringham and Dudgeon Extension Projects (development consent granted April 2024).
- Awel Y Môr Offshore Wind Farm (development consent granted September 2023).
- East Anglia Two and East Anglia One North (development consent granted March 2022).
- Norfolk Vanguard Offshore Wind Farm (development consent granted February 2022).

## 1.3 Scope of assessment

### 1.3.1 Study area (receiving environment)

1.3.1.1 The term ‘visitor economy’ is used to define the receiving environment of relevance for the assessment. This environment includes activities servicing tourists, as well as other user groups (e.g. local residents), and reflects the reality that ‘tourism’ is not the sole economic input to the visitor economy.

1.3.1.2 For example, Blackpool Beach is frequented by visitors from outside North West England, but also many visitors from within North West England, who might not easily meet the definition of a ‘tourist’.



- 1.3.1.3 Similarly, Royal Lytham & St Annes golf club has a membership consisting of many local players (i.e. not tourists) but also welcomes fee paying players from across the world.
- 1.3.1.4 As such, the term ‘visitor economy’ is preferred within ES Volume 4, Chapter 2: Socio-economics (APP-141) as more representative of the receiving environment than the term ‘tourism’.
- 1.3.1.5 The study area identified in ES Volume 4, Chapter 2: Socio-economics (APP-141) for the assessment of potential effects on the wider visitor economy aligns with the Infrastructure Planning (EIA) Regulations 2017, Schedule 3, Paragraph 3(a). This sets out a requirement to take account of ‘the magnitude and spatial extent of the impact (for example geographical area and size of the population likely to be affected)’.
- 1.3.1.6 The identified study area takes an appropriate account of the spatial extent of the impact on the basis of: alignment with the approach taken in comparable consented projects; data availability; and stakeholder responses. Each of these points is set out in more detail below.

### Guidance

- 1.3.1.7 There is no statutory guidance available to direct the identification of appropriate socio-economic study areas, including for the assessment of potential impacts on the visitor economy.

### Previous examples

- 1.3.1.8 Previously consented offshore wind farm DCO Applications (or applications under the equivalent consenting regime in Scotland) have identified comparable study areas for assessing impacts on the wider visitor economy:
- Rampion 2 Offshore Wind Farm: identifies a study area consisting of multiple local authorities across Sussex (~3,800 km<sup>2</sup>).
  - Sheringham and Dudgeon Extension Projects: identifies a tourism study area consisting of multiple local authorities (~5,400 km<sup>2</sup>).
  - Awel Y Môr: identifies a ‘local study area’ covering multiple local authorities across North Wales (~5,700 km<sup>2</sup>).
  - East Anglia Two and East Anglia One North: identifies a ‘local study area’ consisting of multiple local authorities within East Anglia (~1,500 km<sup>2</sup>).
  - Norfolk Vanguard Offshore Wind Farm: identifies a tourism study area consisting of multiple local authorities across Norfolk (~5,400 km<sup>2</sup>).
  - Beatrice: identifies a tourism study area consisting of multiple local authorities across northern Scotland (~35,000 km<sup>2</sup>).
  - Seagreen Project: identifies a tourism study area consisting of multiple local authorities (~2,200 km<sup>2</sup>).



- 1.3.1.9 In each case, the study area, upon which baseline conditions and effects on the wider visitor economy are assessed, covers a geography much larger than Fylde which, by comparison, covers an area of approximately 166 km<sup>2</sup>.
- 1.3.1.10 It is important to consider whether the projects cited above, and the areas within which onshore infrastructure assets are located, are comparable to the Transmission Assets. The local authority areas within which the onshore infrastructure assets are located can be described as broadly similar to Fylde – predominantly rural, coastal locations.
- 1.3.1.11 The Department for Environment, Food & Rural Affairs' (DEFRA, 2025) provides data on the employment numbers for tourism related businesses in England. This can assist in developing an understanding of the role the visitor economy typically plays within rural economies.
- 1.3.1.12 The latest available DEFRA data indicates the average share of employment in tourism activities, as a proportion of total employment in England, is 12%. For rural areas, the equivalent share is 15%. This indicates that the visitor economy typically makes a larger contribution to employment in rural areas than elsewhere.
- 1.3.1.13 The National Coastal Tourism Academy (n.d.) provides research on the nature of coastal tourism to support the development of the visitor economy in coastal communities. They estimate that tourism accounts for an average of approximately 15–20% of total employment in coastal communities.
- 1.3.1.14 Relevant Representations provided by Fylde (RR-705.12) set out that '*Leisure, culture and tourism, and specifically coastal tourism and recreation, make up an important industry in Fylde, accounting for 1 in 10 jobs*' (i.e., ~10%). This evidence suggests that other rural and coastal areas in England have a higher share of visitor economy employment than the share of employment reported by Fylde Council.
- 1.3.1.15 The sensitivity of Fylde's visitor economy can therefore be considered lower than many rural and coastal locations in England.
- 1.3.1.16 As such, it is reasonable to conclude that an approach to assessing effects on the wider visitor economy – which aligns with assessments undertaken for similar projects in comparable locations – is also appropriate in the case of the Transmission Assets.

### Data availability

- 1.3.1.17 The visitor economy operates across a range of geographies, as demonstrated by the manner in which representative bodies typically cover local authorities (e.g. Discover Fylde, Visit Blackpool), sub-regions (e.g. Visit Fylde Coast), regions (e.g. Visit North West), and nations (e.g. Visit England, Visit Britain).
- 1.3.1.18 There is variance in the recency, reliability and quality of the data available to profile baseline conditions at each geographic level.
- 1.3.1.19 The most recent and reliable data on the visitor economy is provided by Visit Britain. Visit Britain is Britain's national tourism agency, which has

a statutory duty to advise the UK Government on tourism policy. To inform this advice, Visit Britain has its own research team and collaborates with civil servants, MPs and industry to gather evidence on the competitiveness of the industry and to remove barriers to the growth of the visitor economy.

- 1.3.1.20 Quarterly statistics on inbound visits and spend are reported by Visit Britain at national and regional levels. The most up-to-date (2022–2024) statistics on the volume and value of domestic tourism are provided at a regional and county level i.e. not at district level.
- 1.3.1.21 Regularly published statistics on the visitor economy are not provided by representative bodies below the national level i.e. regional (Visit North West), sub-regional (Visit Fylde Coast), and local (Discover Fylde, Visit Blackpool).
- 1.3.1.22 Based on data availability, the identified study area can therefore be justified as a cohesive receiving environment upon which to statistically profile baseline conditions within the visitor economy.
- 1.3.1.23 Key visitor economy assets within Fylde Council and Blackpool Council areas have been included within the baseline visitor economy profile in ES Volume 4, Chapter 2: Socio-economics (APP-141), including:
- Blackpool Beach;
  - St Anne's Pier;
  - South Pier (Blackpool);
  - Royal Lytham and St Annes; and
  - Blackpool Opera House (Winter Gardens).

### Stakeholder responses

- 1.3.1.24 An approach to identifying local study areas (including for the assessment of potential effects on the visitor economy) was identified at scoping stage (October, 2022). No comments were received in response to this proposal.
- 1.3.1.25 The extent of the assessed study area was identified in PEIR Volume 4, Chapter 4: Socio-economics (October, 2023). The baseline conditions set out within PEIR Volume 4, Chapter 4: Socio-economics included reference to visitor economy assets both within Fylde and Blackpool local authority areas, and visitor economy assets elsewhere in North West England.
- 1.3.1.26 No section 42 responses were received from statutory stakeholders on the matter of study area identification or the baseline profile of the visitor economy receiving environment as identified.

## 1.4 Evidence of interactions between offshore wind projects and the visitor economy

- 1.4.1.1 Biggar Economics (2020) provides empirical evidence on the relationship between offshore wind farm construction and the local visitor economy in England.
- 1.4.1.2 The study analysed indicators of the visitor economy in 11 cases (including three in North West England) to identify any relationship between offshore wind farms (and associated onshore infrastructure) and changes in visitor behaviour or spending during construction periods.
- 1.4.1.3 This included consideration of whether the construction of associated infrastructure, such as onshore cabling and substations, had an impact on the performance of the visitor economy where this activity took place.
- 1.4.1.4 The purpose of the research was to identify evidence of the construction of offshore wind farms having an impact on the local visitor economy. No evidence was found to support this; instead, it was found that areas, including those with landscape sensitivities, were not impacted by the construction activities of offshore wind farms, including installation of cabling and onshore substations.
- 1.4.1.5 Glasson et al (2021) provides comprehensive research on the impacts of offshore wind farms on local visitor economy and recreation activities in adjacent coastal communities.
- 1.4.1.6 The research presents a literature review setting out key findings from recent academic articles and professional and industry reports on the impacts of offshore wind projects on local visitor economies and recreation. The research includes a review of secondary sources on the predicted impacts of actual projects, drawing on a content analysis of Environmental Statements of offshore wind projects. Finally, the research provides a number of UK case studies of specific projects in coastal locations that provide primary data, by direct survey, of impacts.
- 1.4.1.7 Glasson et al (2021) concludes that:
- Whilst impacts vary from stakeholder to stakeholder, findings from the literature indicate the overall impact of offshore wind projects on the visitor economy are 'benign', and in some cases positive.
  - This is supported by findings from research on *onshore* wind farms, which indicates little or no evidence to demonstrate that any windfarm development has resulted in any adverse impact on the visitor economy.
  - Environmental Statements prepared for UK offshore wind projects largely predict no impact or minor/negligible impact concerning both the visitor economy and recreation, although there are a few examples of predicted positive impacts. Where there is coverage of the visitor economy and recreation in the EU States' Environmental Statements included in the research, findings are similar to those in the UK; that is on balance largely benign and of low significance.

- Results from agency and local business and residents' survey responses indicate there is little evidence of negative impacts of offshore wind projects on local visitor economy and recreation activities. Results demonstrate there are considerably more comments on positive impacts, all set in the wider context of the importance of offshore wind developments in the transition towards renewable energy.

## 1.5 Identification of potential impacts on the visitor economy

1.5.1.1 In assessing any potential onshore effects upon the visitor economy, the following impact pathways have been considered.

- **Visual amenity:** the potential indirect visual impacts on the visitor economy – based on ES Volume 3, Chapter 10: Landscape and visual resources (APP-123).
- **Recreation:** the direct or indirect impact on recreation – based on ES Volume 3, Chapter 6: Land use and recreation (APP-104).

1.5.1.2 The consideration of these impact pathways ensures that localised impacts within close proximity to the order limits have been relied upon to inform the assessment of potential effects on the visitor economy.

### 1.5.2 Visual amenity

1.5.2.1 ES Volume 3, Chapter 10: Landscape and visual resources (APP-123) identifies a study area based on appropriate buffers and the findings of an analysis of the Zone of Theoretical Visibility (ZTV), which includes:

- A 5 km buffer around the outer edge of the onshore substations.
- A 1 km buffer around the area of land to be temporarily occupied during construction within the landfall, onshore export cable corridor and 400 kV grid connection cable corridor.

1.5.2.2 This area is set out at Figure 1.1 in ES Volume 3, Annex 10.4: Landscape and visual impact assessment methodology (APP-127).

### 1.5.3 Recreation

1.5.3.1 ES Volume 3, Chapter 6: Land use and recreation (APP-104) identifies a study area which comprises all land within the Onshore Order Limits, landward of MHWS.

1.5.3.2 This includes consideration of:

- Recreational resources including livery yards and stables, coastal areas, airports, golf courses and sports facilities, public rights of way and other promoted routes (e.g., National Cycle Routes, Long Distance Footpaths).
- Users of recreational resources, including pedestrians, cyclists, equestrians and other forms of recreational activities.

- Land used by the local communities, including public open space (e.g., registered parks and gardens, playing fields, allotments, playgrounds and public beaches) and common land and village greens

1.5.3.3 This area is set out at Figure 6.1 of ES Volume 3, Figures – Part 4 of 7 (APP-134).

## 1.5.4 Assessment of potential significant effects

1.5.4.1 ES Volume 3, Chapter 10: Landscape and visual resources (APP-123) assesses the potential impacts on landscape character, and visual resources. Visual receptors are concerned with the individuals and/or defined groups of people who have the potential to be affected by the Transmission Assets. As such, effects on visual resources have been considered for interactions with the visitor economy.

1.5.4.2 Paragraph 2.12.6.6 of ES Volume 4, Chapter 2: Socio-economics (APP-141) sets out potential effects on visual amenity as a result of substation and onshore cable/landfall construction. There will be no significant long term visual effects on landscape character within the context of the visitor economy as a result of the Transmission Assets.

1.5.4.3 Assessment has indicated that there may be some significant impacts limited to specific representative viewpoints (3 of 18 assessed), and a limited number of users, isolated to the construction phase. Potential significant effects on visual amenity and recreation are very limited in scale, duration, and spatial extent (hyper-local).

1.5.4.4 ES Volume 3, Chapter 6: Land use and recreation (APP-104) assesses the significance of the following potential impacts during the construction phase.

- The temporary impact on the recreational use of coastal areas.
- Other Public Rights of Way.
- The temporary impact on the recreational use of recreational resources.

1.5.4.5 The assessment concludes that during the construction phase, potential effects will be of no more than minor adverse significance.

1.5.4.6 The impact pathways which underpin the assessment of potential significant effects on the visitor economy provide appropriate consideration of visitor economy impacts in the immediate vicinity of the onshore transmission assets.

1.5.4.7 On this basis, the assessment of potential effects on the visitor economy concludes that, within the context of the North West England visitor economy, the significance of effects is assessed as negligible.

1.5.4.8 This finding is consistent with other Environmental Statements prepared for UK offshore wind projects, as summarised within Glasson et al (2021).

1.5.4.9 This finding is also consistent with Marine Scotland (2022) advice, which states that where visitor economy impacts are assessed as part



of a socio-economic impact assessment, it is '*necessary to look at the end result, rather than intermediary factors*'. Further, the advice states that where evidence suggests that perceived changes in visual amenity and recreation conditions do not have an impact on the visitor economy, these impacts are not considered negative as part of the socio-economic impact assessment.

- 1.5.4.10 Given the limited scale, duration, and spatial extent of potential effects on visual amenity and recreation associated with the Transmission Assets (as assessed within ES Volume 3, Chapter 10: Landscape and visual resources (APP-123) and ES Volume 3, Chapter 6: Land use and recreation (APP-104)), reconsidering the assessment by utilising a study area limited to Fylde and/or Blackpool local authority areas (as suggested by the Examining Authority) would not alter the assessment conclusion. Effects would remain 'not significant in EIA terms'.

## 1.6 Conclusion

- 1.6.1.1 The study area identified in ES Volume 4, Chapter 2: Socio-economics (APP-141) for the assessment of potential effects on the wider visitor economy aligns with the Infrastructure Planning (EIA) Regulations 2017, Schedule 3, Paragraph 3(a). As set out within **section 1.3**, the identified study area takes an appropriate account of the spatial extent of the impact on the basis of: alignment with the approach taken in comparable consented projects; data availability for the geography and circumstances in question; and stakeholder responses.
- 1.6.1.2 As set out within **section 1.4**, research on interactions between offshore wind projects and the visitor economy concludes coastal areas are not significantly impacted by the construction and operation of offshore wind projects. This includes the installation of cabling and onshore substations. Where impacts on the visitor economy are observed, these are characterised as either 'benign', or in some cases positive.
- 1.6.1.3 As set out within **section 1.5**, given the limited scale, duration, and spatial extent of potential effects on visual amenity and recreation associated with the Transmission Assets (as assessed within ES Volume 3, Chapter 10: Landscape and visual resources (APP-123) and ES Volume 3, Chapter 6: Land use and recreation (APP-104)), reconsidering the assessment by utilising a study area limited to Fylde and/or Blackpool local authority areas (as suggested by the Examining Authority) would not alter the assessment conclusion – effects would remain 'not significant in EIA terms'.
- 1.6.1.4 This finding is consistent with other Environmental Statements prepared for UK offshore wind projects, as summarised within Glasson et al (2021), and with Marine Scotland (2022) advice.
- 1.6.1.5 The assessment of potential visitor economy effects as presented in ES Volume 4, Chapter 2: Socio-economics (APP-141) is therefore appropriate and does not require reconsideration.

## 1.7 References

Biggar Economics (2020) Offshore Wind Farm Construction and Tourism.

Department for Environment, Food & Rural Affairs' (2025) Statistical Digest of Rural England: 7 - Rural Economic Bulletin Supplementary Data Tables.

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