MORGAN AND MORECAMBE OFFSHORE WIND FARMS: TRANSMISSION ASSETS

Annex 3.5 to Applicants' Response to WRs: The Wildlife Trust for Lancashire, Manchester and North Merseyside

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Term	Meaning
Applicants	Morgan Offshore Wind Limited (Morgan OWL) and Morecambe Offshore Windfarm Ltd (Morecambe OWL).
Candidate Special Areas of Conservation	Areas that were submitted to the European Commission as candidates for designation as a Special Area of Conservation before the end of the Transition Period following the UK's exit from the EU, but not yet formally designated. See also Special Areas of Conservation.
Development Consent Order	An order made under the Planning Act 2008, as amended, granting development consent.
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.
European Protected Species	Species (such as bats, great crested newts, otters and dormice) which receive full protection under The Conservation of Species and Habitats Regulations 2017 and Conservation of Offshore Marine Habitats and Species Regulations 2017.
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).
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 bay inclusive of all construction works, including the offshore and onshore cable routes, intertidal working area and landfall compound(s).
Local Planning Authority	The local government body (e.g., Borough Council, District Council, etc.) responsible for determining planning applications within a specific area.

Term	Meaning
Marine licence	The Marine and Coastal Access Act 2009 requires a marine licence to be obtained for licensable marine activities. Section 149A of the Planning Act 2008 allows an applicant for to apply for 'deemed marine licences' in English waters as part of the development consent process.
Morecambe OWL	Morecambe Offshore Windfarm Ltd is a joint venture between Cobra Instalaciones y Servicios, S.A. (Cobra) and Flotation Energy Ltd.
Morgan and Morecambe Offshore Wind Farms: Transmission Assets	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. Also referred to in this report as the Transmission Assets, for ease of reading.
Morgan OWL	Morgan Offshore Wind Limited is a joint venture between bp Alternative Energy investments Ltd. and Energie Baden-Württemberg AG (EnBW).
National Policy Statement(s)	The current national policy statements published by the Department for Energy Security and Net Zero in 2023.
Planning Inspectorate	The agency responsible for operating the planning process for applications for development consent under the Planning Act 2008.
Protected species	A species of animal or plant which it is forbidden by law to harm or destroy.
Ramsar sites	Wetlands of international importance that have been designated under the criteria of the Ramsar Convention. In combination with Special Protection Areas and Special Areas of Conservation, these sites contribute to the national site network.
Renewable energy	Energy from a source that is not depleted when used, such as wind or solar power.
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.
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.
Transmission Assets	See Morgan and Morecambe Offshore Wind Farms: Transmission Assets (above).

1 Applicants' response to Written Representations

1.1 Introduction

1.1.1.1 Following Deadline 1, Morgan Offshore Wind Limited and Morecambe Offshore Windfarm Limited (hereafter, 'the Applicants') have reviewed each of the Written Representations (WRs) and post hearing submissions received from stakeholders who registered as Interested Parties in the Examination.

1.1.1.2 Details of the Applicants' response to the WR of the Wildlife Trust for Lancashire, Manchester and North Merseyside are set out in the subsequent sections of this annex.

2 Responses to Written Representations

2.1 The Wildlife Trust for Lancashire, Manchester and North Merseyside

Table 2.1: REP1-210 – The Wildlife Trust for Lancashire, Manchester and North Merseyside

Reference	Written Representation Comment	Applicants' response
REP1-210 210.1	**INTRODUCTION** This is a Further Submission regarding the Morgan and Morecambe Offshore Windfarms Transmission Assets Project, promoted by Morgan Offshore Wind Limited and Morecambe Offshore Windfarm Limited: it is made by the Wildlife Trust for Lancashire, Manchester & North Merseyside (Lancashire Wildlife Trust). The Wildlife Trust for Lancashire, Manchester & North Merseyside was founded locally in 1962. Since then, we have grown to be the largest nature conservation membership charity in our area, with 32,000 members and over 1,200 volunteers. We are uniquely positioned to lead change across our region, working at a grassroots, local level whilst also being part of a strong cohesive movement – The Wildlife Trusts. The Wildlife Trusts federation is a movement of 46 independent Wildlife Trusts covering the UK, the Isle of Man, and Alderney, together comprising the largest UK voluntary organisation dedicated to conserving all the UK's habitats and species, whether in the countryside, towns or at sea. We improve places for wildlife and strengthen the relationship between people and the natural environment. Our aim is to protect and create resilient ecosystems on land and in the sea.	The Applicants note this comment.

Reference	Written Representation Comment	Applicants' response
REP1-210 210.2	**SUMMARY** **1. Data deficiencies and uncertainties precluding effective analysis** **2. Fylde Marine Conservation Zone – need for MEEB to discourage cumulative "negligible" impacts** **3. Significant uncertainties about hydrological impact on key dune habitat & species** **4. Sand Lizard disturbance uncertainties and omissions** **5. Potential impact on Long-stalked Orache and / or Meadow Barley – special features of Lea Marsh Biological Heritage Site** **6. Potential degradation of the principal habitat feature of Millbrook Valley Biological Heritage Site, MG5 species-rich grassland** **7. Significant potential for loss of opportunity for a strategic approach to habitat creation, enhancement and expansion.**	The Applicants note the matters set out in this summary and have responded to each item below.
REP1-210 210.3	**OUTSTANDING CONCERNS** Our primary concerns and disagreement remain deficiencies in the content and clarity of the applicant's submission, compounded by errors and omissions that have undermined confidence in its credibility. The assessment lacks the critical detail and data necessary to conduct a thorough and reliable evaluation of the proposed development's potential impacts, particularly in relation to hydrological impacts on Lytham St. Anne's Dunes SSSI & associated dune habitat & species. With reference to the Applicants 'responses to our Relevant Representation RR2180 (some of which also relate to Fylde Council's Relevant Representation concerning geographic areas of mutual interest e.g. Fylde Dunes and Foreshore),	The Applicants are confident that the assessment of ecological receptors is robust, precautionary and has identified sufficient and appropriate mitigation measures. In relation to hydrological impacts on Lytham St. Anne's Dunes SSSI & associated dune habitat & species, further information is being produced to supplement the Applicants' previous responses on this matter and address concerns raised by stakeholders. This information will include a Preliminary Hydrogeological Risk Assessment informed by existing hydrogeological information from desk study information, Ground Investigation data, and National Vegetation Classification and Phase 1 habitat survey data presented in the Volume 3 Annex 3.3: Phase 1 Habitat, National Vegetation Classification and

Reference	Written Representation Comment	Applicants' response
	we would suggest that some matters might be resolved by meeting to clarify areas of common ground and updating each other on relevant data sets.	Hedgerow of the ES (F 3.3.3/F02). The Applicants intend to submit the Preliminary Hydrogeological Risk Assessment at Deadline 3. However, the Applicants will look to pro-actively engage with the Wildlife Trust for Lancashire, Manchester & North Merseyside to discuss the points raised.
REP1-210 210.4	**OFFSHORE ELEMENTS** The Wildlife Trust for Lancashire, Manchester, & North Merseyside supports the North West (of England) Wildlife Trusts' joint response on the marine elements of the DCO. Please see the relevant representation from the North West Wildlife Trusts (Cumbia, Lancashire, and Cheshire) for full detail, but our principal concerns are outlined below: **'Fylde' Marine Conservation Zone** We are concerned that there is spatial overlap between the transmission asset and Fylde Marine Conservation Zone (MCZ), which has been designated for its subtidal sand and mud habitats. We would expect to see an in-principle Measures of Equivalent Environmental Benefit (MEEB) produced by the applicant. The applicant states that there will be 30,400 m2 of potential habitat loss in the MCZ. We believe this to be a significant amount. We note that, at PEIR stage, Natural England advised that the applicants should explore options for a Stage 2 MCZ assessment, including an in-principle MEEB Plan. That has not been done. Placement of hard infrastructure on a soft sediment feature will lead to permanent change in, loss to, or damage to the feature for the lifetime of the project. Every effort should be taken to limit and reduce cable protection in soft sediments, particularly designated areas and MCZs. We welcome the reduction of cable-protection infrastructure since PEIR; and the reduction in sand-wave clearance from 60% to 5% for the Morgan offshore export	The Applicants' position regarding impacts to the Fylde Marine Conservation Zone (MCZ) and the requirement for Measures of Equivalent Environmental Benefit (MEEB) is outlined in full in the Applicants' response to RR-1601.45 of Natural England's Relevant Representation (PDA-014). In summary, the Applicants' MCZ Screening and Stage 1 Assessment Report (APP-019) concluded that cable protection for the Transmission Assets would not hinder the conservation objectives of the Fylde MCZ. The Applicants therefore maintain that a Stage 2 MCZ Assessment and MEEB are not required for the Transmissions Assets. However, in response to the request from the Examining Authority (ExA) in the Rule 9 Letter (PD-005) to provide a Without Prejudice In-Principle Stage 2 MCZ Assessment (REP1-059), the Applicants submitted a Stage 2 MCZ Assessment, including a without prejudice, in-principle MEEB plan, at Deadline 1 (REP1-059). The Applicants welcome the Wildlife Trust for Lancashire, Manchester & North Merseyside's comments regarding the reductions in cable protection and sandwave clearance within the Fylde MCZ. The Applicants would highlight that, in accordance with the Overarching National Policy Statement for Energy (EN-1), the maximum design scenario (MDS) for cable protection within the Fylde MCZ has been designed in line with the mitigation hierarchy, as outlined in Table 1.13 of the MCZ Screening and Stage 1 Assessment Report (APP-019). Under the mitigation hierarchy developers must seek to avoid, reduce and mitigate environmental impacts before considering compensation. A detailed summary of all the MDS reductions made to minimise environmental impacts to features of the Fylde MCZ are outlined in full in the Applicants' response to RR-1601.45 of Natural England's Relevant Representation (PDA-014).

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	cables, and 30% to 5% for the Morecambe offshore export cables. Accordingly, we welcome the applicants' "without prejudice" agreement to produce a MEEB. However, we maintain that one should be required in principle as, given terrestrial experience, incremental small losses can lead to substantive cumulative impact and development of offshore transmission assets is predicted to increase exponentially in UK waters.	
REP1-210 210.5	**Subsea Construction Noise** We are also concerned about the impact of subsea construction noise on marine life, particularly cetaceans. We welcome the recent changes in policy to underwater noise mitigation legislation. On 21st January, Defra (2025) published the Marine Noise Policy Paper – Reducing Marine Noise which states that "From January 2025…all offshore wind pile driving activity across all English waters will be required to demonstrate that they have utilised best endeavours to deliver noise reductions through the use of primary and/or secondary noise reduction methods in the first instance." We consequently also welcome the applicants' strengthening of their commitment to employ mitigation to reflect this change in policy.	The Applicants have provided a detailed response on this subject previously, within RR-1655 1655.4 (PDA-007). Additionally, the draft Development Consent Order was updated at Deadline 1 (REP1-008) to remove the ability to clear unexploded ordnance (UXO) using high-order methods in response to concerns raised from the MMO and NE. Condition 20 in Schedule 14 and Schedule 15 of the draft DCO/DMLs (REP1-008) therefore, only allows for clearance of UXO using low-order methods at Deadline 1. Accordingly, the Outline Marine Mammal Mitigation Protocol has been updated at Deadline 2 (J18/F02) to reflect this commitment and changes made to the draft DCO. CoT64 of Volume 1, Annex 5.3: Commitments Register of the ES (F 1.5.3/F03) was updated at Deadline 2 to reflect this.
REP1-210 210.6	**ONSHORE ELEMENTS** **<u>Fylde Council District, Lancashire</u>** **INTERTIDAL AND ONSHORE INFRASTRUCTURE AREAS** Whilst the 100m minimum offset distance from the SSSI boundary is noted (Commitment Reference (CoT) 44) & the disturbance risk to sand lizard already mentioned below, we do have concerns about possible physical or temporal (66 months duration) overlap between the landfall and beach	The Applicants have made a commitment (CoT44 of Volume 1, Annex 5.3: Commitments Register of the ES (F 1.5.3/F03)) to locating the exit pits associated with the direct pipe installation at least 100 m seaward of the western boundary of the SSSI to avoid impacting the designated habitat. This is secured by Requirement 8 within Schedules 2A & 2B of the draft Development Consent Order (C1/F04). In addition, the Applicants would like to highlight that Compound 2 will also be situated in Works No. 5A5B or 4A4B as shown on the Works Plans – Onshore and Intertidal Part 1 of 2 (AS-016) noting that the boundaries of Work Nos. 5A5B or 4A4B are 100m seaward of the western boundary of the SSSI. The Applicants

Reference	Written Representation Comment	Applicants' response
	working/vehicular access routes with the Fylde Sand Dunes Project's work to accrete the dunes seawards in this area. Unimpeded dune accretion is critical in the delivery of the Shoreline Management Plan 22/11B, specifically continuing dune maintenance to allow these to function as a soft sea defence along approximate current alignment. Most dune accretion work focuses on accreting the dune toe seawards, by installing parallel lines of posts and chestnut paling each year, which are supplemented by the planting of donated/recycled Christmas trees and planting of Marram and Lyme Grass plugs or transplants. Together, these work to trap windblown sand and advance the dune toe seawards, creating new dune habitat. Annual accretion of 10 metres has been achieved in places. In 2025, volunteers at the annual Christmas tree planting event delivered 1km of new, linear sea defence in 3 days. We note (s3.11.13.8), that the beach compound 2 (exact location to be confirmed – 2,500m2 in extent within 4A4B) will be kept a minimum 15m distance from the front of the dune system, which is very much closer than the 100m standoff required for the exit pits (CoT44). We highlight this point in the context of dune accretion rates and the need for access for machinery & large numbers of staff/volunteers to support dune accretion works, particularly during our annual large-scale Christmas tree 'planting' event (Jan/Feb – tide dependent). A minimum 15m distance also brings compound works very much closer to sand lizard habitat in the foredunes. We also note that post-construction, further beach compounds may be required in the event of cable repair/reburial during the operational life of the development (35 years, possibly longer if re-powered to take advantage of the 60-year seabed lease).	would also refer the Wildlife Trust for Lancashire, Manchester & North Merseyside to Annex 5.3 to the Applicants response to Hearing Action Points: ISH1 13, 14, 16, 17 (REP1-040) which provides further details in regards to the proposed cofferdams. As previously stated in RR 2180.9, the Applicants recognise the sensitive nature of the sand dune habitats and will continue to work with the Wildlife Trust for Lancashire, Manchester & North Merseyside to ensure that there is no conflict between the construction activities and the important work of the Fylde Sand Dunes Project to protect and maintain the dunes. This would also be the case for works on the beach that may be required during the operational phases of the projects.

Reference	Written Representation Comment	Applicants' response
	We welcome the Applicant's response to RR 2180.9 in that they will engage with the Dunes Project to ensure that the construction phase does not compromise the delivery of dune accretion in this area. If planned delivery is impacted, this compromises the delivery of the Shoreline Management Plan and the works to achieve SSSI Favourable Condition Status.	
REP1-210 210.7	CoT110 is noted as is CoT32.	The Applicants note this comment.
REP1-210 210.8	**Disturbance to SPA birds**: We concur with Natural England's representations and will not repeat those here.	The Applicants acknowledge the comment and have provided response to Natural England's representations (PDA-023).
REP1-210 210.9	**Fairhaven Saltmarsh Permanent Mitigation:** Based on long experience of working on this coast, we are very dubious that the proposed mitigation measures (CoT113 and outlined in the Outline Ecological Management Plan) will be effective in mitigating for disturbance and temporary habitat loss on waders impacted by the Transmission Assets construction/operation and decommissioning. We doubt that the proposed soft fencing and signage would be an effective deterrent to bird disturbance from people and especially dogs, as this is a heavily used stretch of coast. More information is also required on fencing specification and installation to ascertain any impacts on saltmarsh and local coastal processes. Wardening may be beneficial, but we would advise the Applicants to engage with Fylde Council Coast and Countryside Service to better understand recreational patterns and bird issues in this specific area. We also note that Natural England has major reservations (comments H60/61 in Appendix H of its RR) regarding the data used, proposed mitigation efficacy and justification.	The Applicants acknowledge the comment regarding the effectiveness of the proposed soft fencing and signage as deterrents to human and dog disturbance. Given the high recreational use of this coastal stretch, the Applicants understand the challenges associated with reducing the impact of recreational activities at Fairhaven Saltmarsh, however are confident on the effectiveness of the mitigation. The Applicants are engaging in discussions with Natural England regarding the proposed mitigation measures at Fairhaven Saltmarsh and have provided additional information within Appendix B of the Outline Ecological Management Plan (oEMP) (J6/F02).' Fylde Council are the body that will be responsible for approving the final environmental management plan through Requirements 12A and 12B of the draft DCO and will therefore be able to ensure that the relevant parties within the Council are involved in the details of the EMP.

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REP1-210 210.10	**Compound 1 (Welfare) in North Beach car park:** You need to be aware that access to North Beach car park is integral to delivery of the Dunes Project. Parking for events/volunteers and staff is required and storage space for thousands of donated Christmas trees each year is non-negotiable. The precise siting of the welfare compound area will be critical given the duration of its presence. We welcome the applicants' commitment to deliver on same, though the devil will be in the detail.	The Applicants note the comment raised by The Wildlife Trust for Lancashire, Manchester and North Merseyside and will continue to engage on this matter with them. However, the Applicants refer the Wildlife Trust for Lancashire, Manchester & North Merseyside to Annex 5.3 to the Applicants response to Hearing Action Points: ISH1 13, 14, 16, 17 (REP1-040) which confirms that of the total 126 standard parking bays located at the North Beach Car Park, 104 standard bays will remain open and available to the public for the duration of the works and access to the car park will be maintained during construction works.
REP1-210 210.11	**FYLDE SAND DUNES (Lytham St. Anne's SSSI, Local Nature Reserve, Biological Heritage Site, Geological Heritage Site)** The Fylde Sand Dunes Project manages the sand dunes as a partnership project between Lancashire Wildlife Trust and Fylde and Blackpool Councils, with Environment Agency funding. For clarity, comments here are made on behalf of Lancashire Wildlife Trust **ONLY, & NOT** the other Project Partners. We have serious concerns regarding the impact of the Project proposal on the Fylde Sand Dunes and their wildlife as outlined below: Our key concerns remain disturbance to sand lizards and the lack of clarity regarding impacts on the water table that may adversely affect sand dune habitat/species and humid dune slacks (both being groundwater dependent features and ecologically/hydrologically vulnerable).	The Applicants reiterate that there would be no direct impacts to the sand dune habitats or sand lizard population at Lytham St Anne's SSSI, LNR, BHS and GHS as a result of the construction of the project, because the dunes will be crossed using trenchless technology. The entry and exit pits associated with the trenchless crossing will be of a sufficient distance away from Lytham St Anne's SSSI to ensure there are no direct impacts. The depth of the trenchless crossing of the dunes will be confirmed at the detailed design stage following ground investigation works, but it should be noted that this is a standard construction approach that is adopted to avoid impacts on sensitive habitat features. The Applicants note that several stakeholders have raised concerns about potential indirect effects to the dune habitats as a result of the trenchless crossing, and therefore are preparing further information to be submitted at D3 The impacts of the Transmission Assets on Lytham St Annes Dunes SSSI, including dune slack communities because of potential hydrological changes during the installation of offshore export cables below Lytham St Annes Dunes SSSI are considered in section 3.11.4 of Volume 3, Chapter 3: Onshore ecology and nature conservation (APP-075). As stated in paragraph 3.11.4.13 of Volume 3, Chapter 3: Onshore ecology and nature conservation (APP-075), the 2016 NVC survey indicates that plant communities within the dune slacks are likely to have the capacity to adapt (be resilient) to temporary variation in water availability.
REP1-210 210.12	**Adverse hydrological impacts:** The Environmental Statement (ES) recognises that much of the Dunes' notified biological interest relates to hydrologically dependent surface water features which are already affected by aquifer abstraction and improved land drainage in the adjoining golf course. The ES also recognises that the proposal may result	

Reference	Written Representation Comment	Applicants' response
	in groundwater levels being reduced as the entry pits are dewatered for excavation. Secondly, longer term, the presence of export cables beneath Lytham St Anne's SSSI may disrupt the aquifer that sustains the dune slacks on a temporary, long term or permanent basis. This is a huge 'known unknown'risk, the impact of which will not be clarified until after DCO consent is granted and at detailed design stage, when a hydrogeological risk assessment will be undertaken to inform the detailed site-specific crossing design (CoT128). We note that the Commitments Register references CoT41, 43, 44, 94, 104 and 119 amongst others. All are particularly relevant to this issue. We concur with the comments of both Natural England and the Environment Agency, in advising that further information is needed on the position of the water table of Lytham St. Anne's Dunes SSSI and related dune habitats. Natural England advise the installation of an appropriate number & distribution of dip-wells to provide a baseline detailed picture of the position of the water table and fluctuations (pre and post construction). In addition, modelling is required to determine the position of the water table and any fluctuations that may arise as part of the proposed development (dewatering of Transition Joint Bays and Direct Pipe Trenchless Technique cable installation beneath the dunes). The Monitoring Plan also needs to make provision for measuring hydrological change and any impacts on humid dune slacks (species and habitat) & thus whether proposed mitigation measures have been effective (or not).	As stated in paragraph 3.11.4.16, of Volume 3, Chapter 3: Onshore ecology and nature conservation (APP-075), a preliminary assessment of the impact of dewatering was undertaken using available borehole data which determined that no changes in groundwater because of dewatering during construction are anticipated within Lytham St Annes Dunes SSSI. On this basis, the assessment concluded that there would be no adverse effect on Lytham St Annes Dunes SSSI because of dewatering during the construction phase of the Transmission Assets. Notwithstanding the above, as shown in CoT128, Volume 1, Annex 5.3: Commitments register (F1.5.3/F03), the Applicants have committed to undertaking further hydrogeological risk assessment(s) at the detailed design stage, which will be informed by site specific information which could include ground investigations. An outline hydrological risk assessment in regards to Lytham St Annes Dunes will be submitted at Deadline 3. This is secured by an update to Requirement 8 in Schedules 2A & 2B of the draft DCO (C1/F04). These will inform the detailed site specific crossing design for the installation of the offshore export cables beneath Lytham St Annes SSSI. Taking the above information into account, including the commitment to undertake further hydrogeological assessment prior to the commencement of construction, it is considered the impacts of the Transmission Assets on Lytham St Annes Dunes SSSI, including dune slack communities as a consequence of dewatering have been sufficiently assessed and mitigated for, within Volume 3, Chapter 3: Onshore ecology and nature conservation (APP-075).
REP1-210 210.13	**Disturbance to sand lizards:** A population of sand lizards (Lacerta agilis) - one of the UK's rarest reptiles - is located on the dunes following a successful reintroduction programme (2017- 2021) and these are monitored annually (sightings of adults/juveniles/hatchlings) by the Dunes	The Applicants welcome the offer of data sharing of recent records of sand lizards, which if consent is forthcoming can be incorporated into the detailed Ecological Management Plan(s). The sensitivity of the sand lizard population at Lytham St Anne's dunes is acknowledged by the Applicants, and that this has been raised by other

Reference	Written Representation Comment	Applicants' response
	Project and local experts from Amphibian & Reptile Conservation . We will share our most recent records (2024) on a redacted basis (heat maps), but these records mean that we are extremely concerned that the use of the old sand-winning access and compound (repurposed as Compound 3 for this proposal) as the principal vehicular beach access from Clifton Drive North will cause disturbance, possibly direct conflict. 2025 sand lizard surveys are underway, with 50+ sightings to date and the earliest sightings on record (March). We do have point data that we can share but only on a redacted basis, with guarantees required that it will not be released into the public domain. The ES recognises the disturbance issue (through vibration), but seemingly only in relation to piling for cofferdams on the beach & not the use of the access track/compound 3. Sand is an unstable substrate and may be vulnerable to slumping, possibly causing the collapse of sand lizard burrows onto hibernating/breeding sand lizards. Track-widening and use of matting might also be an issue as surveys show that sand lizards are known to preferentially bask on the northern edge of the track and are also concentrated around Compound 3. Timing, season, vehicle frequency and type will also be relevant considerations as will be plans for compound fencing, lighting and use of matting within compounds. It has been extremely difficult to determine from the ES exactly when the access track will be in use and thus whether sand lizards are likely to be active or in hibernation. We note from Natural England's Relevant Representation (comment G32) that on the Formby foredunes, where Sand Lizards are also present, works likely to cause disturbance have been restricted to April/May. CoT79 will be especially relevant.	stakeholders including Natural England and the Local Planning Authority. It is not anticipated that the use of the track would cause any damage or disturbance to sand lizard habitat or result in direct mortality to sand lizards as a result of vehicle movements. The track is already the principal access point onto the beach for vehicles and machinery associated with beach and dune maintenance. Sand lizards are secretive and would be reasonably expected to move away from any sources of disturbance; which also includes extensive pedestrian and dog walking activity throughout the dunes at this location. Any use of temporary track matting etc. that may be appropriate to further reduce the risk of disturbance to sand lizards would be incorporated into the detailed Ecological Management Plan(s) secured by Requirements 12A and 12 B of the draft DCO and would be agreed with relevant stakeholders.

Reference	Written Representation Comment	Applicants' response
REP1-210 210.14	**Inadequate data and errors in habitat mapping:** Dunes Project staff have identified that several areas of habitat on the Local Nature Reserve (LNR) have been wrongly mapped, e.g. dune slack areas mapped as scrub. This accuracy matters as it means that the site and ecological impacts may have been incorrectly assessed with scrub being less susceptible to hydrological influence than dune slacks. Key species have also been missed or vastly under recorded, e.g. Smooth Newt and hundreds of Common Toad. There is a significant under recording of all species that have been presented on the maps, data could have been made available from the Dunes Project but was not requested. There is no specific species data for both insects and plants. Considering the ecological importance of the area and the rare and endemic species present (e.g. the sole surviving specimen of the nationally rare Hybrid Willow (Salix x friesiana), these should have been identified within the environmental assessment. We note that Natural England also have similar concerns (G17) regarding data gaps and the consequent difficulty in accurately assessing ecological impacts arising from the proposed development, most especially in relation to water table change impacting humid dune slacks.	The Applicants note that data on amphibians and reptiles within the sand dunes was helpfully provided by the Fylde Sand Dunes project to inform the ecological baseline, as referenced in Table 3.6 of Volume 3, Chapter 3, Onshore Ecology and Nature Conservation (APP-075), particularly in relation to the sand lizard population, which is well monitored at this location since the introduction took place. The habitat mapping of the sand dunes that informed the impact assessment was primarily informed by the 2016 NVC survey undertaken by botanical specialist Graeme Skelcher, with a ground truthing botanical NVC survey undertaken by the Project in summer 2024. Given that the project will not directly impact the dune habitats (due to the use of trenchless crossing techniques), and that impacts on the hydrology were not considered to be significant due to the depth of the trenching and the offsetting from dewatering activities associated with the exit pits and transition joint bays, it was not considered necessary or proportionate to undertake a detailed suite of amphibian, reptile or terrestrial invertebrate surveys. The scope of ecology surveys was agreed at an early stage of the project with key stakeholders and discussed at Expert Working Group (EWG) meetings, as detailed in Appendix G of Technical Engagement Plan Appendices Part 2 of 3 (APP-191) . However, regardless of this, the ecological value and sensitivity of the dune habitats and the animal and plant species they support are well documented and further surveys undertaken by the Applicants would not have changed the evaluation of their importance to nature conservation, or the conclusions of the impact assessment. To address concerns about potential indirect effects to the dune habitats as a result of the trenchless crossing the Applicants are preparing further information (to be submitted at Deadline 3). Further details are provided above in REP1-210 210.12.
REP1-210 210.15	**Point of information - forthcoming ecological surveys (Summer 2025):** • In Summer 2025, an ecological consultant (Graeme Skelcher) will be repeating his previous NVC and	The Applicants welcome the offer of data sharing from forthcoming specialist surveys of the sand dunes, which if consent is forthcoming can be incorporated into the detailed Ecological Management Plan(s). However, as stated above, additional baseline information would not change the evaluation of the

Reference	Written Representation Comment	Applicants' response
	Notable Plant surveys (last conducted in 2009/10/16/17) as well as saltmarsh surveys. Our Future Coast is funding these surveys so its permission will be required to share the data. • Invertebrate surveys of the SSSI will also be undertaken in Summer 2025 by the Tanyptera Trust. Again, its consent would be required for data sharing.	importance of the dune habitats to nature conservation, nor the outcome of the impact assessment.
REP1-210 210.16	**Impacts on Biological Heritage Sites (BHS) and other Important Ecological Features (IEFs) along the onshore cable route:** Whilst direct impacts are avoided on several BHS through the use of trenchless technology, other BHS & IEF's are directly affected, e.g. Lytham Moss BHS functionally-linked land and the two BHS ponds (Freshfield Farm Ponds – North, and - South) which would be destroyed by sub-station construction (CoT122), as would 2 other ponds. We note CoT101, which commits to the avoidance of high concentrations of peat along the cable route. Regarding peat deposits, the interactive England Peat Map was published by DEFRA on 12/5/25 providing a further source of updated information. A quick check of the map seems to reveal peat deposits below the Lytham St. Anne's LNR, which may have hydrological implications. Also, the avoidance of the Queensway Farmland Conservation Area. See also representation below on specific BHS in Preston City District and in South Ribble Borough.	**Biological Heritage Sites** Mitigation in the form of replacement ponds will be provided for the loss of Freshfield Farm Ponds North and South BHSs and will be delivered in land west of Morgan Onshore Substation which is identified as Works No. 49A on Works Plans - Onshore and Intertidal - Part 1 of 2 (AS-016). Further information can be found in the Outline Ecological Management Plan (J6/F02) **Peat Management** As shown in Volume 3, Annex 6.2: Agricultural land classification survey results (APP-106), the soil auger boring surveys have identified limited areas of peat within the Onshore Infrastructure Area. In addition, the soil survey work also found that peat resources identified in the Soil Survey of England and Wales mapping (see Table 6.5 of Volume 3, Annex 6.2: Agricultural land classification survey results (APP-106)) have been subject to significant wastage over the 60 year period since the original mapping was undertaken in the late 1960s due to the continuation of intensive agricultural management of these soils.. In addition to the ALC and soil surveys reported in Volume 3, Annex 6.2: Agricultural land classification survey results (APP-106), peat resources were also considered in Volume 3, Chapter 1: Geology, hydrogeology and ground conditions (APP-068), Volume 3, Chapter 3: Onshore ecology and nature conservation (APP-075) and Volume 3, Chapter 5: Historic environment (APP-096). Taking the above information into account, it is considered that sufficient information has been provided with respect to peat resources within the study area to determine the likely significant effects of the Transmission Assets and

Reference	Written Representation Comment	Applicants' response
		inform mitigation requirements reported in Volume 3, Chapter 6: Land use and recreation (APP-104) and the J1.7 Outline Soil Management Plan (APP-200). Section 1.7.6 of the Outline Soil Management Plan (APP-200) includes several measures to manage potential impacts of the Transmission Assets on peat within the Onshore Order Limits, where these cannot remain in situ during the construction phase. These would include, where required: • additional peat probing surveys to determine the extent and depth of peat to be affected; • additional measures to ensure the effective handling, storage and reinstatement of peat during the construction phase; • the preparation of appropriate Peat Management Plans PMP(s) as part of the detailed SMP(s) which will be submitted for approval by the relevant local authorities prior to the commencement of construction, as secured under Requirement 8 of Schedules 2A & 2B of the draft DCO (C1/F04). These measures will ensure that any peat that cannot be avoided will be appropriately managed during the construction works.
REP1-210 210.17	**Mitigation Measures/Outline Ecological Management Plan/Outline Landscape Management Plan:** Many of the proposals are indicative at this stage and, in the case of the Outline Ecological Management Plan, all measures are subject to landowner agreement (3.18.1.1) and so delivery is not guaranteed, nor the duration of the measures. Time constraints and the putative nature of these documents have limited further comment.	The Applicants note that measures would be confirmed in the detailed Ecological Management Plan (EMPs) which will be secured by Requirement 12 within Schedules 2A & 2B of the draft Development Consent Order (C1/F04), however are not subject to landowner agreement as the DCO secures the necessary consent and land rights needed to deliver he works. The detailed EMPs will be implemented by the Applicants as approved by the relevant planning authority in consultation with Natural England, as appropriate.
REP1-210 210.18	**Onshore Biodiversity Benefits Statement:** We note the use of voluntary Biodiversity Net Gain (BNG) in advance of the requirement for statutory BNG on NSIPs (from November 2025) and the aspiration to deliver 10% voluntary BNG. Also, the intention to look for additional enhancement opportunities (1.10.1.1 – 1.10.1.2). Again, time constraints limit further comment.	The Applicants note the comment made.

Reference	Written Representation Comment	Applicants' response
REP1-210 210.19	**Great Crested Newts and District Level Licencing Scheme:** We note the intention to use this scheme within the dense Fylde pond-scape – a predominantly amber risk zone (CoT92).	Noted. The geographical location of the project within a predominantly amber risk zone would be factored into the calculation of the Conservation Payment by Natural England for entry into the District Level Licensing Scheme.
REP1-210 210.20	Lea Marsh Biological Heritage Site (BHS) Our Relevant Representation stated: "This saltmarsh BHS lies along the estuary of the Savick Brook where it flows into the northern side of the upper Ribble Estuary. This brook forms the boundary of Preston City District and Fylde Borough, the more extensive eastern section of the BHS being within the city, though that section was omitted from the relevant map in B14." The applicants' response states that, *"There is an omission on the Onshore Statutory and Non-Statutory Nature Conservation Sites Plan (APP-161) (B14) in the lack of BHS shading for Lea Marsh (APP-161). This will be updated for Deadline 1. The full and correct boundary of the site is provided in Volume 3, Annex 3.1: Onshore Ecology desk study technical report (APP-075) and this was used as the basis for assessing impacts on the BHS."* We welcome the applicants' intention to update the 'Onshore Statutory & Non-statutory Nature Conservation Sites Plan' (APP-161) (B14) to shade all of Lea Marsh BHS, so including the sector east of the Savick Brook channel, which sector lies within Preston City District.	The Applicants note the comment made.
REP1-210 210.21	The applicants' response further states that, "The temporary mitigation measures to be delivered within Lea Marsh BHS for otter set out in paragraph 1.5.3.63 of the Outline Ecological Management Plan (APP-212) are relatively limited in nature, and include the provision of	**Lea Marsh BHS Temporary Otter Mitigation** There is no pathway by which the construction of artificial holts could adversely affect the interest features of the BHS. The proposed reedbed management (identified in Appendix B of the oEMP (J6/F02) would not result in any damage to this habitat type and would aim to

Reference	Written Representation Comment	Applicants' response
	artificial holts, improvement of reedbeds and invasive non-native plant species control, none of which would reasonably adversely affect any of the interest features of the Lea Marsh BHS." Proposed temporary mitigation proposals for impact of construction on European Otter (Lutra lutra) to be delivered on this BHS – see J6, 1.6.4.22 &c – still do not explicitly assess the potential impact of those proposals on the species and habitat features for which Lea Marsh is identified as a BHS. The outline description of the proposed adjacent mitigation for displaced European Otter (Lutra lutra), whilst welcomed in principle, lacks detail to reassure on its potential impact on some of the identified selection features for Lea Marsh BHS. Of note in that regard is the occurrence of Long-stalked Orache (Atriplex longipes), a nationally scarce species of brackish upper saltmarsh habitat, and Meadow Barley (Hordeum secalinum), a perennial species of old grassland included in the Provisional Lancashire Red Data List of Vascular Plants. Direct disturbance, changes in salinity, and grassland management consequent on the proposed mitigation management for potentially displaced otters may or may not impact on either or both species populations - positively or negatively - depending on where the mitigation measures were to occur and how it would be managed. The 'Biodiversity Benefit Area' proposals on farmland immediately to the west of Lea Marsh BHS – see J11, pp 25-26 (fig 1.3); pp 31-32 (fig 1.6) - are presented as not yet at the "detailed design stage", so are too generic to comment on effectively. That said, no consideration is given to potential benefits or disbenefits to the qualifying features of Lea Marsh BHS, or to that of Masons Wood BHS (an	improve the habitat quality for otters; there is no reasonable likelihood that this management would adversely affect the BHS. The proposed alterations to grassland management by reducing the intensity of grazing would only serve to enhance the biodiversity of the sward by allowing species to flower and set seed; this would not adversely affect any of the perennial grassland species or damage the integrity of the BHS. As part of the detailed EMP(s), it is proposed to undertake a detailed baseline botanical survey of the entire Lea Marsh BHS prior to the commencement of enhancement works. This will aim to identify the specific location of any key species that are of particular interest within the BHS (e.g. long-stalked orache) and avoid them. Full details (including management and monitoring objectives) would be included within the detailed EMP(s), which would be secured by Requirement 12 within Schedule 2A & 2B of the draft DCO (C1/F04). The detailed EMPs will be implemented by the Applicants as approved by the relevant planning authority in consultation with Natural England, as appropriate **Biodiversity Benefit Area at Lea Marsh Fields** The intention of habitat creation would be to complement the existing Lea Marsh BHS and Masons Wood BHS, and to provide a habitat bridge between the two BHSs to encourage natural colonisation by animals and plants (noting that this area of land is at present low ecological value cropland).

Reference	Written Representation Comment	Applicants' response
	ancient woodland) partially adjacent to the eastern boundary of said proposed Biodiversity Benefit Area.	
REP1-210 210.22	The applicants' response goes on to state that, *"With reference to the proposed biodiversity benefit set out in the Onshore Biodiversity Benefit Statement (AS-054), the size of the proposed biodiversity benefit site and its current habitats have been selected based on the quantified impacts of the permanent above ground elements of the scheme, to ensure that there is scope to provide biodiversity benefit."* The applicants' response is welcome as far as it goes but, if said biodiversity benefit were to be developed in isolation from the adjacent ecological landscape, it would risk missing the opportunity to (re)create an ecotone from the ancient woodland edge habitat of Masons Wood BHS to the brackish upper saltmarsh habitat of Lea Marsh on the Savick Brook estuary in line with the Lawton Principles, as enacted in the Environment Act 2021.	The intention of habitat creation would be to complement the existing Lea Marsh BHS and Masons Wood BHS, and to provide a habitat bridge between the two BHSs to encourage natural colonisation by animals and plants (noting that this area of land is at present low ecological value cropland).
REP1-210 210.23	**South Ribble Borough, Lancashire** Howick Hall Ponds Biological Heritage Site (BHS) 52NW11 (note "Ponds" plural) Our Relevant Representation stated: "This pond-based BHS consists of two disjunct parts. The smaller, western part contains two ponds and lies extremely near the extant National Grid substation west of Penwortham. Mitigation is proposed, but details are too general at this stage to assess their likely effectiveness. The applicants' response is as follows: "Potential impacts to this pond [sic] have been assessed as negligible (see section 3.11.6 of Volume 3, Chapter 3: Onshore ecology and nature conservation (APP-075).	Transmission Assets will not directly impact Howick Hall Ponds BHS as it lies outside the Order Limits. There is therefore no potential for direct impacts to any of the qualifying features of the BHS. The impact assessment presented in Volume 3 Chapter 3: Onshore Ecology and Nature Conservation (APP-075) considers potential indirect effects to Howick Hall Ponds BHS due to changes in hydrology (paragraph 3.11.16.18) and disturbance/ fragmentation (paragraph 3.11.6.19) and concludes that the impacts would be no change and negligible respectively. As stated in the previous response, potential impacts to GCN are addressed through precautionary measures in the oEMP (J6/F02). As no significant effects on the BHS were identified, no avoidance or mitigation measures were considered necessary.

Reference	Written Representation Comment	Applicants' response
	Mitigation measures have been outlined in the Outline Ecological Management Plan (OEMP) APP-212. The Applicants have made a commitment (CoT76 of Volume 1, Annex 5.3: Commitments Register of the ES (AS-030)) to develop detailed Ecological Management Plan(s) in accordance with the OEMP (APP-212) and will include pre-construction, construction and post-construction mitigation measures relating to habitats. This is secured by Requirement 12 within Schedules 2A & 2B of the draft Development Consent Order (AS-004). Detailed Ecological Management Plan(s) will be implemented by the Applicants as approved by Requirement 12 in consultation with relevant stakeholders, as appropriate. The OEMP provides for the mitigation measures to be implemented to protect great crested newt (GCN) which include but are not limited to: The installation of exclusion fencing prior to construction, where appropriate; Cessation of works if GCN are found including contacting a Natural England GCN licenced ecologist to handle and, where necessary relocate GCN to outside the exclusion fence line and to provide further advice where necessary." The generic provision for Great Crested Newt is welcomed, but that is but one of the multiple features for which Howick Hall Ponds BHS is so identified. By way of background and picking out the key qualifying features from the relevant BHS description text, the site comprises **a cluster of field ponds and associated terrestrial habitat** on the western outskirts of Penwortham. It is made up of two separate parcels of land lying east and west of Howick Cross Lane, **the latter being most directly impacted by the proposed development**. The ponds vary	

Reference	Written Representation Comment	Applicants' response
	considerably in character and in the range of plants and animals that each support. **Collectively** the ponds support a substantive breeding amphibian population - **Common Frog, Common Toad, Smooth Newt,** and **Great Crested Newt**. The adjoining Blashaw Wood, Blashaw Dam Wood, ponds and grassland to the east provide additional valuable amphibian habitat. The pond cluster also supports **a good range of invertebrates including three nationally scarce species of water-beetle**. These are ***Ilybius guttiger*** (a predaceous diving-beetle), ***Cercyon ustulatus*** (a water scavenger-beetle) and ***Helochares lividus*** (also a water scavenger-beetle). The ponds are well vegetated and support a rich diversity of aquatic and marginal plant species of which **Lesser Marshwort (*Apium inundatum*)** and **Horned Pondweed (*Zannichellia palustris*)** are included in the **Provisional Lancashire Red Data List of Vascular Plants**. Four other species from the Provisional Lancashire Red Data List are present, namely White Waterlily, Greater Spearwort, Water-soldier and Galingale. However, the presence of these latter species may be the result of deliberate introductions. There does not appear to be any reference to potential impacts specifically on these qualifying features of Howick Hall Ponds BHS in section 3.11.6 of Volume 3, Chapter 3: *Onshore ecology and nature conservation* (APP-075). There does not appear to be any reference to proposed specific avoidance or mitigation measures for potential impacts on these qualifying features of Howick Hall Ponds BHS in the Outline Ecological Management Plan (OEMP) APP-212.	

Reference	Written Representation Comment	Applicants' response
	Accordingly, we must continue to reserve our position in the absence of the putative Detailed Ecological Management Plan.	
REP1-210 210.24	Mill Brook Valley Biological Heritage Site (BHS) 52NW01 The applicants' response to our initial submission is as follows: ""The reference to paragraph 3.11.5 of Volume 3, Chapter 3: Onshore ecology and nature conservation (APP-075) refers to the potential impacts on the BHS rather than mitigation, in the context of ecological networks. Potential impacts on BHS sites specifically are discussed in paragraph 3.11.6 of Volume 3, Chapter 3: Onshore ecology and nature conservation (APP-075). Mitigation for potential effects on Mill Brook Valley BHS are discussed in paragraph 3.11.6.52 and CoT126 of Volume 1, Annex 5.3: Commitments Register of the ES (AS-030). The Applicants have made a commitment (CoT126 of Volume 1, Annex 5.3: Commitments Register of the ES (AS-030)) to mitigate for potential temporary habitat loss associated with Mill Brook Valley Biological Heritage Site. Temporary construction compounds will be micro-sited to avoid the site wherever reasonably practicable. This is secured by Requirement 8 within Schedules 2A & 2B of the draft Development Consent Order (AS-004). "The Applicants have made a commitment (CoT76 of Volume 1, Annex 5.3: Commitments Register of the ES (AS-030)) to develop detailed Ecological Management Plan(s) in accordance with the OEMP (APP-212) which will include measures for habitat restoration including grassland at Mill Brook Valley BHS. This is secured by Requirement 12 within Schedules 2A & 2B of the draft Development Consent Order (AS-004). Detailed Ecological Management Plan(s) will be implemented by the Applicants as approved by Requirement	It is acknowledged that a large volume of documentation is required for a DCO application. To summarise the previous response from the Applicants: - The project will have a direct impact on part of Mill Brook Valley BHS; based on the Order Limits, this would potentially result in the temporary loss of 2.27 ha of the BHS of which approximately 1.18 ha is grassland habitat for which the BHS is designated. - The Applicants have made a commitment (CoT126 of Volume 1, 5.3: Commitments Register of the ES (F.1.5.3/F03)) that to mitigate for potential temporary habitat loss associated with Mill Brook Valley Biological Heritage Site, temporary construction compounds will be micro-sited to avoid the site wherever reasonably practicable. This is secured by Requirement 12 within Schedules 2A & 2B of the draft Development Consent Order (C1/F04). - Specific mitigation measures for the reinstatement of the impacted habitat within Mill Brook Valley BHS post-construction will be incorporated in a detailed EMP. The Applicants have made a commitment (CoT76 of Volume 1, 5.3: Commitments Register of the ES (F.1.5.3/F03)) that EMPs will be developed in accordance with the oEMP. This will include the management of ecological mitigation areas. The Detailed EMPs will be developed in consultation with the relevant statutory advisors and regulators. This is secured by Requirement 12 within Schedules 2A & 2B of the draft Development Consent Order (C1/F04). The detailed EMPs will be implemented by the Applicants as approved by the relevant planning authority in consultation with Natural England, as appropriate -

Reference	Written Representation Comment	Applicants' response
	12 in consultation with relevant stakeholders, as appropriate. In addition, the Applicants have made a commitment (CoT27 of Volume 1, Annex 5.3: Commitments Register of the ES (AS-030)) to reinstate all temporary construction compounds once construction has been completed including the micro-sited compounds at Mill Brook Valley BHS. This is secured by Requirement 8 within Schedules 2A & 2B and Requirement 16 of Schedules 2A & 2B of the draft Development Consent Order (AS-004)." We welcome the applicants' clarification of what has been a bewildering array of online documents to identify, locate and assess in the very limited core charitable time available to us.	
REP1-210 210.25	The applicants indicate, in paragraph 3.11.6 of Volume 3, Chapter 3: Onshore ecology and nature conservation that, *"Habitat would be reinstated but the impact will be long term and there is a risk that habitat of comparable quality cannot be provided or maintained. Therefore, the magnitude of impact would be up to* ***high****."* The proposed mitigation, as outlined, would seem to have a reasonable chance of partial success and we cautiously welcome it on that basis. However, we cannot be more confident than that in our assessment at this stage and, given the magnitude of impact would be up to "high" and would be on an area of irreplaceable species-rich grassland habitat, now very scarce at national and county levels, we must continue to reserve our position in the absence of the putative Detailed Ecological Management Plan. Semi-natural grassland is one of the most threatened habitats in the UK, with a reported 97% loss of semi-natural enclosed grasslands in England with Wales between 1930 and 1984. Most of the lowland semi-natural grassland in	The Applicants refer The Wildlife Trust for Lancashire, Manchester & North Merseyside to REP1-210.24

Reference	Written Representation Comment	Applicants' response
	England has been degraded in terms of its species-diversity as a side-effect of successive Government policy driven measures taken in the latter half of the 20th century to unsustainably intensify agricultural production, and the grasslands in lowland Lancashire are no exception. Ancient species-rich semi-natural grasslands are an important part of Lancashire's critical environmental capital that is difficult or impossible to replace once destroyed. Now uncommon, these are thought to be being lost faster than any other type of terrestrial wildlife habitat. They are extremely vulnerable to agricultural improvement since many species are lost when soil fertility is increased; and to neglect, as a few common plant species tolerant of eutrophication become dominant in ungrazed and uncut swards. The more natural and species-rich sites that remain are now often small and isolated but may still support communities of specialised plant and animal species, albeit at increased risk of local extinction.	
REP1-210 210.26	**LOCAL NATURE RECOVERY STRATEGY (LANCASHIRE COUNTY):** Our Relevant Representation stated: "The opportunity and risk afforded by linear infrastructure to contribute to and/or impede delivery of England's Nature Recovery Network as identified in the statutory Local (Lancashire) Nature Recovery Strategy (Environment Act 2021) appears unaddressed." The applicants' response to our representation is as follows: "The Local Nature Recovery Strategy for Lancashire was considered in the writing of Volume 3, Chapter 3: Onshore ecology and nature conservation (APP-075) (see section 3.6.1.19 (APP075)). The issue of landscape connectivity is addressed through the consideration Ecological Networks	The Applicants welcome the comment that the Wildlife Trust for Lancashire, Manchester & North Merseyside accepts the Applicants' commitment to develop detailed EMP(s). The Applicants would refer the Wildlife Trust for Lancashire, Manchester & North Merseyside to the Site Selection of the Environmental Mitigation and Biodiversity Benefit Areas note (S_D2_13) submitted at Deadline 2 submitted at Deadline 2 that outlines that the proximity of existing designated sites and similar habitats was a key consideration of the site selection process for the environmental mitigation and biodiversity benefit areas.

Reference	Written Representation Comment	Applicants' response
	(APP-075, Section 3.11.7). This included Lancashire Grassland and Woodland Networks identified by LERN as the foundation for the emerging LNRS for Lancashire. Indirectly, landscape connectivity has also been addressed through consideration of statutory and non-statutory designated nature conservation sites, priority habitats and ancient woodland, as well as connectivity for protected species where they occur within the Order Limits. The Applicants have made a commitment (CoT76 of Volume 1, Annex 5.3: Commitments Register of the ES (AS-030)) to develop detailed Ecological Management Plan(s) in accordance with the OEMP (APP-212) which will include measures for habitat restoration following construction with appropriate management and monitoring. This is secured by Requirement 12 within Schedules 2A & 2B of the draft Development Consent Order (AS-004). Detailed Ecological Management Plan(s) will be implemented by the Applicants as approved by Requirement 12 in consultation with relevant stakeholders, as appropriate. The Applicants consider the commitments to robust mitigation for impacts on ecological networks, habitats, designated sites and protected species will mean delivery of the emerging LNRS and therefore delivery of Natural England's Nature Recovery Network will not be impeded." The response is noted and is accepted in terms of minimisation of impact on the county's nature recovery network. However, investigation of potential opportunities for significant creation, enhancement and extension of ecologically appropriate linear wildlife habitat connectivity along the route of the terrestrial transmission infrastructure would appear to have been missed, at least at this stage. Extensive road, rail and energy network developments are planned across the north of England. This affords an opportunity to ensure biodiversity and environmental net	

Reference	Written Representation Comment	Applicants' response
	gain work across these networks whilst also improving their resilience to climate change; and to identify and create new green infrastructure to provide a range of benefits including mitigation of the adverse effects of said networks, improvements to ecological connectivity, and provision of ecosystem services. The consultation draft of the Lancashire Local Nature Recovery Strategy and related network was launched on 16th May 2025, so that draft will now be available for consideration.	
REP1-210 210.27	**TO CONCLUDE ...** The UK is facing several crises, all interlinked – climate, nature, energy, and cost-of-living. It is critical that global greenhouse gas emissions are reduced rapidly to keep climatic temperature rise below an average of 2˚C globally, and that wildlife-rich natural systems are protected and restored. We face an ecological emergency with 41% of wild species in decline in the UK. Consequent to our core charitable remit, our principal objective in responding to this, or any, national infrastructure proposal is to minimise further loss to the UK's and to our region's biodiversity and to maximise opportunities to deliver and secure its recovery. The Wildlife Trusts collectively, and The Wildlife Trust for Lancashire, Manchester, & North Merseyside locally, wish to engage constructively in this process to advocate for and ensure that outcome. In transitioning to renewable energy, the UK will become primarily reliant on renewably generated electricity as a source of energy. This will require the construction and maintenance of extensive infrastructure, both onshore and offshore, to distribute electrical energy to where it is needed. That will involve the equivalent of the creation of an offshore	The Applicants note the comments and considers its co-ordinated application meets the objectives of ensuring the UK's transition to renewable energy in a holistic and coordinated way to ensure that impacts on nature's recovery are kept to a minimum, and that all new infrastructure results in a direct improvement to the natural environment to meet the UK Government's international treaty obligations and national statutory targets for nature's recovery. .

Reference	Written Representation Comment	Applicants' response
	grid network, in the Irish Sea and other UK waters, and significant onshore grid upgrades across the UK, including within and across our subregion. This must be planned and delivered in a holistic and coordinated way to ensure that impacts on nature's recovery are kept to a minimum, and that all new grid infrastructure results in a direct improvement to the natural environment to meet the UK Government's international treaty obligations and national statutory targets for nature's recovery	