

LOCAL IMPACT REPORT

SOUTH RIBBLE BOROUGH COUNCIL

APPLICATION BY: **Morgan Offshore Wind Limited and Morecambe Offshore Windfarm Limited for an Order Granting Development Consent for the Morgan and Morecambe Offshore Wind Farms Transmission Assets**

PLANNING INSPECTORATE REF: EN020028

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1.0 Introduction

- 1.1 Following the preliminary meeting held on 29 April 2025, the examining Authority wrote to South Ribble Borough Council setting out the procedural decisions made in respect of the forthcoming Examination into the application.
- 1.2 This document is the Local Impact Report (LIR) for SRBC, in accordance with the advice and requirements set out in the Planning Act 2008 (as amended) as, 'a report in writing giving details of the likely impact of the proposed development on the authority's area (or any part of that area)'.
- 1.3 In preparing this LIR the local authority has had regard to the DCLG's Guidance for the examination of applications for development consent (2015), the Planning Inspectorate's Advice Note One, Local Impact Reports (2012) and Government Guidance 'Nationally Significant Infrastructure Projects: Advice for Local Authorities' (2024). The LIR relates only to the onshore elements and identifies the most relevant policies and the main issues the Council has concerns over.

2.0 Site Description

- 2.1 The Morgan substation site is located between Kirkham and Freckleton, south of the A583 Kirkham Bypass and east of Hall Cross. It is north of the Morecambe substation site and surrounded by Lower Lane, Greenbank Farm, and Freshfield Farm to the west, HM Prison Kirkham to the northwest, and Newton-with-Scales to the east. The site slopes gently eastward from approximately 16 meters above ordnance datum (AOD) to around 6.5 meters AOD at Dow Brook. It is irregularly shaped, delineated by field boundaries and Dow Brook, and currently used for cattle grazing. A public bridleway (BW0505016) runs west of the site from Hall Cross to Freckleton.
- 2.2 The Morecambe substation site is situated south of the Morgan substation site, east of Lower Lane, and north of Freckleton. A public bridleway and Dow Brook run to the east of this relatively flat site, which ranges from 9 to 12 meters AOD.
- 2.3 The offshore elements of the Transmission Assets are located in the east Irish Sea within English offshore and inshore waters, while the onshore elements are within the local authority areas of Fylde Council, Blackpool Council, South Ribble Borough Council, Preston City Council, and Lancashire County Council.
- 2.4 The proposed onshore substations and sections of the onshore export cable corridor would be located within the Warton to Kirkham Green Belt, and the 400 kV grid connection cable corridor would be within the South Ribble Green Belt.
- 2.5 The Transmission Assets are set within a diverse landscape that includes urban areas with historic industrial buildings juxtaposed with agricultural areas. This landscape features marginal upland pastures, extensive

grasslands, wooded river corridors of the Ribble Valley, arable fields of the Fylde, and drained horticultural landscapes of the mosslands. Lancashire's landscape is characterized by long views and inter-visibility between various landscape types, contrasting with the intimate and undulating countryside around the substation. Settlement patterns include clusters of 18th and 19th-century red brick farm buildings and rural villages, influenced by 20th-century development. Enclosed coastal marshes and intertidal flats, particularly around the Ribble, Lune, and Wyre estuaries, are valued for their beauty and prolific birdlife.

3.0 Details of the proposal

3.1 The application for development consent for the Transmission Assets includes the following:

- Morgan Offshore Wind Project: Transmission Assets – the offshore export cables, landfall and onshore infrastructure required to connect the Morgan Offshore Wind Project to the National Grid; and
- Morecambe Offshore Windfarm: Transmission Assets - the offshore export cables, landfall and onshore infrastructure required to connect the Morecambe Offshore Windfarm to the National Grid

3.2 The Project will comprise both permanent and temporary infrastructure including, but not limited to:

- Offshore infrastructure including offshore export cables, offshore substation platform(s), interconnector cables and a Morgan offshore booster station.
- Landfall works (where the offshore cables reach the shore) between Mean Low Water Springs and the transition joint bays including the offshore and onshore cables, intertidal working area and landfall construction compound(s), and temporary and permanent access.
- Onshore infrastructure from the transition joint bays to the electricity transmission network connection. This includes onshore export cables to the two new substations, temporary construction compounds, temporary and permanent access, and onward connections to the existing National Grid substation at Penwortham, Lancashire.
- Areas for biodiversity net gain, enhancement and / or mitigation, including permanent access for operation and maintenance of those areas.

3.3 The two offshore wind farms are expected to make a key contribution to the UK's target of generating 50GW of power from offshore wind by 2030. Combined they have the potential to generate almost 2GW of electricity – enough to power the equivalent of around two million homes.

4.0 Policy Context

4.1 Relevant planning policy and legislation considered in the determination of the application is that summarised below:

International Climate Change Commitments	
United Nations Framework Convention on Climate Change (UNFCCC)	An intergovernmental treaty effective since 1994, aiming to stabilize greenhouse gas concentrations to prevent dangerous interference with the climate system.
Kyoto Protocol	Signed in 1997, it commits industrialized countries to limit and reduce greenhouse gas emissions. The UK's commitments under this protocol were transposed into UK law by the Climate Change Act 2008.
Paris Agreement (COP21)	Adopted in 2015, it aims to limit global temperature increases to well below 2°C, with efforts to limit it to 1.5°C. The UK ratified this agreement in 2016 and committed to reducing greenhouse gas emissions by at least 68% by 2030.
Glasgow Climate Pact (COP26, COP27, COP28)	Adopted in 2021, it includes commitments to phase down coal use and accelerate actions to transition to renewable energy by 2030. The COP28 summit highlighted the need for more ambitious climate actions and established a new climate finance goal.
UK Climate Change and Renewable Energy Commitments	
Climate Change Act 2008 (as amended)	Initially committed the UK to an 80% reduction in greenhouse gas emissions by 2050, revised to a net zero target by 2050 in 2019.
Energy Act 2013	Provides a legislative framework for secure, affordable, and low carbon energy, including provisions for Electricity Market Reform (EMR) to incentivize low carbon electricity generation.
Clean Growth Strategy 2017	Emphasises the need to grow national income while cutting greenhouse gas

	emissions, aiming for clean growth and affordable energy supply.
National Infrastructure Assessments (2018, 2023)	Highlight the need for low-cost, low-carbon electricity and propose a highly renewable generation mix. The 2023 assessment identifies key challenges in decarbonizing energy, supporting economic growth, and improving climate resilience.
UK Offshore Wind Sector Deal 2019	Sets commitments to support offshore wind energy development, including funding for research and development, job creation, and infrastructure upgrades.
National Infrastructure Strategy 2020	Plans significant investment in offshore wind and modern ports to expand renewable energy generation and support jobs and growth.
Ten Point Plan for a Green Industrial Revolution 2020	Aims to create jobs through clean energy, with a focus on advancing offshore wind and quadrupling capacity by 2030.
Energy White Paper 2020	Sets a net zero target by 2050, outlines plan to quadruple offshore wind capacity by 2030 and highlights the potential for significant private sector investment and job creation.
Net Zero Strategy - Build Back Greener 2021	Sets out the long-term plan to end the UK's contribution to man-made climate change by 2050, with key policies including powering the UK entirely by clean electricity by 2035.
British Energy Security Strategy 2022	Aims to accelerate offshore wind delivery and strengthen renewable National Policy Statements to reflect energy security and net zero importance.
Powering Up Britain - The Net Zero Growth Plan 2023	Restates existing policies and confirms the UK's commitment to a decarbonized power system by 2035.
Great British Energy 2024	Confirms the government's commitment to renewable energy, including offshore wind, aiming to make Britain a clean energy superpower by 2030.

UK Transmission Infrastructure Strategy and Policy	
Holistic Network Design 2022	Aims to facilitate a collaborative approach to offshore wind projects connecting to the National Grid. The Morgan and Morecambe projects are part of this initiative, seeking a single consent for their Transmission Assets.
Consenting Regime	
Planning Act 2008	<p>The Planning Act 2008 is a comprehensive piece of legislation that provides a streamlined process for approving major infrastructure projects, ensuring they align with national policy objectives and contribute to sustainable development goals.</p> <p>Recent reforms under the Levelling-up and Regeneration Act 2023 have introduced changes to enforcement action time limits and the introduction of Enforcement Warning Notices (EWNs) for local planning authorities.</p> <p>The Act provides for the creation of NPSs (detailed above), which set out the need for and policies to be applied to NSIPs. The Morgan and Morecambe Offshore Wind Projects exceed the threshold for an offshore generating station with a capacity of more than 100 MW, thus qualifying as NSIPs. The applicants have opted for a joint consent for the Transmission Assets to ensure alignment and consistency with the Generation Assets.</p>
Marine and Coastal Access Act 2009	This act introduced a marine planning and licensing system, requiring a marine licence for certain activities at sea. Applicants can apply for 'deemed marine licences' as part of the consenting process. The Marine Management Organisation (MMO) oversees these licences.
Environmental Impact Assessment Regulations	EIA involves identifying and assessing the significant effects likely to arise from a project. The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 set out the requirements for EIA under the Planning Act 2008.

Habitats Regulations	The Conservation of Habitats and Species Regulations 2017 and the Conservation of Offshore Marine Habitats and Species Regulations 2017 require the assessment of significant effects on internationally important nature conservation sites. The Secretary of State for Energy Security and Net Zero is the competent authority for this assessment.
Environment Act 2021	This act sets out targets, plans, and policies for environmental protection in England. It includes provisions for biodiversity net gain, requiring a 10% biodiversity net gain for NSIPs from November 2025. Projects accepted into the Examination stage before this date are not required to meet this target but may choose to do so voluntarily.
Water Environment (Water Framework Directive) (England and Wales) Regulations 2017	These regulations set objectives for surface and groundwater bodies, aiming to improve the water environment. The effects of the Transmission Assets on these objectives are considered in the Environmental Statement.
Environmental Permitting (England and Wales) Regulations 2016	These regulations ensure that authorised activities and their discharges do not endanger the environment or human health.
International Conventions	
The Ramsar Convention 1976	The Ramsar Convention on Wetlands of International Importance is an international treaty established in 1976 for the conservation and sustainable use of designated wetland areas, known as Ramsar sites. These sites are designated based on criteria such as supporting 20,000 water birds or 1% of the individuals in a population of one species or subspecies of water bird. In the UK, Ramsar sites are protected under the National Site Network, similar to Special Protection Areas (SPAs) and Special Areas of Conservation (SACs)
The OSPAR Convention 1992	The OSPAR Convention, signed in 1992, aims to protect the marine environment of the North-East Atlantic. It includes a series of Annexes detailing measures for pollution prevention, marine environment quality

	assessment, and the protection and conservation of marine ecosystems and biodiversity. The UK has identified several Marine Protected Area (MPA) designation types under this convention, including Marine Conservation Zones (MCZs), SACs with marine components, SPAs with marine components, Nature Conservation MPAs, and national MPAs in Scotland.
The Espoo Convention 1997	The Espoo Convention, effective since 1997, sets out the obligations of Parties to notify and consult each other on major projects likely to have significant adverse transboundary effects. This convention has been transposed into UK legislation through the Environmental Impact Assessment (EIA) Regulations.
The Convention on Biological Diversity 1993	Objectives include the conservation of biological diversity, sustainable use of the components of biological diversity and the fair and equitable sharing of the benefits arising from the utilization of genetic resources. The overall aim is to encourage actions leading to a sustainable future.
Marine Policy	
UK Marine Policy Statement 2011	The UK-wide Marine Policy Statement (MPS), published in March 2011 under the Marine and Coastal Access Act 2009, provides a framework for marine spatial planning. It guides the preparation of Marine Plans and decision-making affecting the marine environment. The Marine Management Organisation (MMO) has adopted a regional approach to developing marine plans in English waters.
Northwest Inshore and Northwest Offshore Marine Plan 2021	The Transmission Assets are located within the areas covered by the Northwest Inshore and Northwest Offshore Marine Plan. This plan introduces a strategic approach to marine planning, informing decision-making by marine users and regulators on activities within the marine plan area.
National Planning Policy	
National Policy Statements (NPS)	National Policy Statements (NPS) are essential tools for guiding the development

	<p>and assessment of nationally significant infrastructure projects, ensuring that they align with government policy and contribute to sustainable development goals.</p> <p>Relevant NPSs include:</p> <ul style="list-style-type: none"> - NPS EN-1: Overarching Energy Policy - outlines the need for new energy infrastructure to ensure the UK has secure, affordable, and low-carbon energy supplies, providing guidance on how applications for energy infrastructure will be assessed and the principles that will guide decision-making. <p>The revisions to NPS EN-1 (2025) emphasises the need for a diverse mix of energy sources, including the mass deployment of offshore wind, onshore wind, solar power, nuclear energy, and low-carbon hydrogen. The updates include enhanced guidelines for environmental protection, biodiversity, and climate change mitigation with a strong focus on public engagement and consultation. Clearer guidance on how to address cumulative impacts is included and reinforces the need for strategic environmental assessments.</p> <p>The revised NPS EN-1 reflects recent legislative changes and policy developments, including the UK's commitment to a decarbonized power system by 2035.</p> <p>It reinforces the urgency of developing new energy infrastructure to meet the UK's energy needs and climate change goals.</p> <ul style="list-style-type: none"> - NPS EN-3: Renewable Energy Infrastructure - outlines various types of renewable energy infrastructure, including offshore wind farms, onshore wind farms, solar power, biomass, and energy from waste.
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	<p>The policy emphasizes the importance of renewable energy in reducing greenhouse gas emissions and transitioning to a low-carbon energy system. It outlines the government's ambition to deploy up to 50 GW of offshore wind capacity by 2030 and highlights the need for substantially more installed capacity to achieve net zero carbon emissions by 2050.</p> <p>The 2025 revisions aim to clarify the applicability of section 2.8, which pertains to other offshore infrastructure, including wake effects and their impact on renewable energy projects.</p> <ul style="list-style-type: none"> - NPS EN-5: Electricity Networks Infrastructure – outlines infrastructure for electricity networks, including transmission systems, distribution systems, and associated infrastructure such as substations and converter stations. <p>2025 revisions provided updated assessment principles for judging the impacts of electricity network projects, balancing the benefits against potential adverse impacts. The updates emphasise the need for a coordinated approach to transmission infrastructure, even when separate from generating assets.</p> <p>The proposed updates reflect the government's commitment to achieving Clean Power by 2030 and net zero emissions by 2050.</p>
National Planning Policy Framework	<p>The NPPF sets out the UK Government's planning policies for England and provides a framework for how these policies should be applied. It aims to achieve sustainable development through a balanced approach to economic, social, and environmental objectives.</p>

	<p>The National Planning Policy Framework (NPPF) was updated in December 2024 to reflect the UK Government's evolving planning policies and priorities.</p> <p>The most relevant changes in the recent NPPF update are as follows:</p> <p><u>Climate Change and Transition to Net Zero:</u></p> <ul style="list-style-type: none"> - Paragraph 161 now explicitly refers to the transition to net zero by 2050, requiring the planning system to support this transition and consider all climate impacts, including overheating, water scarcity, and storm risk - Paragraph 162 adds drought to the list of matters to be considered and links health and climate change by requiring policies to support measures ensuring community health and resilience to climate change - Paragraph 163 mandates that climate change mitigation and adaptation be considered in preparing and assessing planning applications, requiring whole-life carbon assessments, energy efficiency measures, and Scope 3 emissions to be included. <p><u>Renewable and Low Carbon Energy Development:</u></p> <ul style="list-style-type: none"> - The final update omits the general support for renewable and low carbon energy and removes the requirement to approve applications if impacts are acceptable. Instead, Paragraph 168(a) requires significant weight to be given to the benefits of renewable and low carbon energy generation. - Former footnote 57, which imposed a de facto moratorium on onshore wind, has been removed <p><u>Energy efficiency and Carbon Emissions:</u></p> <ul style="list-style-type: none"> - The updated NPPF does not specifically refer to operational and
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	<p>embodied carbon but implies their consideration through the requirement to mitigate the full range of potential climate impacts in Paragraph 163</p> <ul style="list-style-type: none"> - Paragraph 164(b) requires new development to be planned in ways that help reduce greenhouse gas emissions through design <p><u>Climate Resilience:</u></p> <ul style="list-style-type: none"> - Paragraph 24 adds climate resilience as a key spatial issue for strategic planning across local planning authority boundaries - Paragraph 164 retains the requirement for new development to avoid increased vulnerability to climate change impacts - Paragraph 136 emphasises the importance of trees in urban environments for climate mitigation and adaptation <p>The amendments are noted to reflect a stronger emphasis on climate change considerations in planning but also highlight areas where further alignment with climate goals may be needed.</p>
Local Policy	
The South Ribble Local Plan (South Ribble Borough Council, 2015)	<p>The South Ribble Local Plan (South Ribble Borough Council, 2015) was adopted in July 2015 and is instrumental in guiding the future development of the South Ribble area in Lancashire. This plan outlines and allocates the necessary land over a 15-year period to meet various objectives. Its primary aim is to foster vibrant communities by strategically designating land for housing, employment, the natural environment, and local services. The most relevant policies are summarised below:</p> <ul style="list-style-type: none"> - Policy A1: Developers Contributions - Policy F1: Parking Standards - Policy G1: Green Belt - Policy G4: Protected Open Land

	<ul style="list-style-type: none"> - Policy G7: Green Infrastructure - Existing Provision - Policy G8: Green Infrastructure – Future Provisions - Policy G13: Trees, Woodlands and Development - Policy G14: Unstable or Contaminated Land - Policy G16: Biodiversity and Nature Conservation - Policy G17: Design Criteria for New Development
Central Lancashire Adopted Core Strategy	<p>The Central Lancashire Core Strategy (Preston City Council et al., 2012) was collaboratively prepared by Preston City Council, Chorley Council, and South Ribble Council, and was officially adopted in July 2012.</p> <p>The Core Strategy outlines the overall strategic direction for planning in the Central Lancashire area from 2010 to 2026, ensuring alignment with national policies. The main objectives are to coordinate development, stimulate investment, and improve employment opportunities. The strategy focuses on sustainable managed growth while preserving and enhancing green spaces and ensuring access to open countryside.</p>

5.0 Impacts of the proposal

- 5.1 South Ribble Borough Council recognizes the importance of renewable energy to provide a sustainable future, offering environmental, economic and social benefits which contribute to a healthier planet and more resilient energy system. It is also recognised that legislation and updated policy (detailed in section 4) seeks to significantly expand in offshore wind farms, aiming to provide high-capacity energy solutions whilst minimising land use. The council acknowledges the national benefits of the project in contributing to renewable energy targets and fostering sustainable economic growth. However, weight must also be placed on achieving these goals without causing significant harm to the local built and natural environment, local communities or tourist economy. The council notes that engagement from the applicants has been limited following the draft stage and a fixed approach was concluded without consultation however, the council remains committed to working closely with the applicants and their consultees to resolve concerns highlighted below and any other that may arise from further work.

Principle of Development, Site Selection and Alternatives

- 5.2 The council raises concerns that the site selection and consideration of alternatives relies heavily upon the high-level justification provided by the Environmental Statement, specifically F1.4 Volume 1, Chapter 4 [the SSES]. This sets out the rationale for connecting the Morgan Offshore Wind Project to the National Grid, yet details of the generation assets suggested for connection at Penwortham are not considered to be fully justified.
- 5.3 The iterative site selection process undertaken by the applicant is acknowledged in order to consider local alternative locations for infrastructure and routing, however this is noted to be isolated to the local area with an offshore search extent of Formby to Blackpool with the only requirement being a connection to the national grid transmission at Penwortham. This did not afford a wider extent to be fully explored to ensure the solution that is to be delivered is the most appropriate having regard to impacts on communities, business, tourism and farmland, and damage to ecology/landscape/archaeology as well as cost. It is recognised that some alternative sites were assessed part of NESO, such as connection to the Stanah substation which was not supported due to the need for a new substation and impact on residential/recreational surroundings and associated time and cost. However, it is still considered that other opportunities, for example, connection into existing overhead infrastructure to the north which directly link to Penwortham have not been fully assessed or justified as to why these options are unsuitable.
- 5.4 Whilst the rationale behind the approach to seek connection to the National Grid at Penwortham is acknowledged, the principle of development for the generation assets has not been established and there will be cross-cutting impacts between the generation and transmission elements which must be considered. The cumulative assessment set out within Section 5.4.9 within Volume 1, Chapter 5: Environmental assessment methodology (APP-034) considered the generation assets in isolation with the transmission assets as argued that assets cannot be consented in isolation from generation assets. However, the Council remains concerned that the overlapping impacts have not been fully assessed.
- 5.5 The Holistic Network Design Review produced in accordance with National Energy System Operator (NESO)) recommended Morgan and Morecambe wind farms have radial connections with a shared cable corridor. It was considered that the shared onshore and offshore cable corridor and landfall would minimise the impact of the cables on the environment and local community. It is acknowledged that this approach is in line with the applicant's proposal however concerns remain as to the weight afforded to NESO advice and whether it should be assumed to outweigh alternatives, where those alternatives would be more suitably sited when assessed against the Development Plan and any development which may thereafter be affected by proposed generation assets. As such, as presented, it is considered that there remain deficiencies with that proposed as other alternative options have not

been fully considered or reviewed, and the principle of development cannot be satisfactorily balanced.

Potential Offshore Environmental Effects

- 5.6 The Council considers that matters relating to offshore environmental effects will largely be addressed by other bodies, notably Natural England and the Marine Management Organisation.

Potential Onshore Environmental Effects

- Onshore ecology, nature conservation and intertidal ornithology
- 5.7 As the final design details of the Transmission Assets are not yet determined, it is not possible for the applicant to identify problems arising from the development when there is no conclusion as to what the final scheme will be. Until sufficient details of the 400kv corridor route and onshore infrastructure is made available, the council remains concerned that the proposed development would provide appropriate ecological improvement or satisfy that alternative sites could not provide better ecological improvement.
- 5.8 Further information is required in relation to the management and restoration of peat during the construction process. In addition to acting as a significant carbon store, peat can support important habitats, and, in some cases, restorable peat could be considered to be an irreplaceable habitat because of its integral role in supporting important rare habitats. At present, the level of information provided does not provide sufficient reassurances that impacts on peat can be adequately avoided, mitigated or compensated. A more comprehensive Peat Management Plan should be required to be developed.
- 5.9 The council are also concerned that some ecological receptors which are either not considered to be fully assessed or have insufficient mitigation/compensation measures identified within the Environmental Statement and secured within the draft Development Consent Order (DCO). These include the impact on bats, hedgerows, wood and trees (including their removal) both prior to and during construction as well as little acknowledgement of local ecological designations and features of interest. The council also notes that limited information has been provided on the likely impact on farmland which surrounds the proposal site.
- 5.9 The site is located within the Ribble and Alt Estuaries SPA/Ramsar, and it is considered that further proposals are required to ensure that impacts on notable bird species associated with the designated sites where landfall occurs within and close to the intertidal zone can be avoided and/or successfully mitigated. This would include (not limited to) restrictions on times of working and the extent of the working areas.
- 5.10 The submission of an Ecological Management Plan and Biodiversity Benefit Statement are acknowledged but noted to require further details if the scheme is permitted. The Biodiversity Benefit Statement refers to habitat creation and

enhancement as 'indicative' rather than confirmed. The council argue that these issues should be submitted during the examination, to provide the necessary level of reassurance that ecological impacts will be able to be mitigated and/or compensated, and ecological enhancement achieved, before any permission is granted to the proposals. Details should include land ownership and management information, and bodies responsible for future management and monitoring of ecological mitigation and enhancement areas.

5.11 With regards to delivery of enhancements and net gains for biodiversity, it is really important that within the impact assessment process (and beyond) that different measures are clearly identified as mitigation or compensation, and that any ecological enhancements/net gains can be justified as additional measures. Demonstration of the Good Practice Principles for net gain should be demonstrated through this project, which include application of mitigation hierarchy (Principle 1) and additionally (Principle 7). Whilst it is acknowledged that the statutory requirement to provide at least a 10% gain in biodiversity may not apply to the project, nevertheless the scheme should aim to deliver a meaningful improvement to biodiversity. To this end there should be further consideration of the need for habitat creation and enhancement efforts to contribute to the creation of coherent nature recovery networks in South Ribble.

5.12 The impacts on this sensitive area will be long lasting and as such, significant weight must be afforded to the impact on ecology, nature conservation and intertidal ornithology. The council argues that the information provided does not fully demonstrate that the cumulative impacts of the proposals in relation to recent and planned development pressures along the route of the transmission assets have been comprehensively assessed. Consequently, it is concluded that insufficient information has been provided at this stage regarding the location and design of the Transmission Assets to inform the assessment of likely significant effects on onshore ecology and nature conservation receptors, including the identification of and commitment to providing appropriate mitigation and monitoring requirements.

- Historic environment

5.13 The Council notes that the results of the program of geoarchaeological deposit modelling (APP-096 table 5.4) is yet to be provided and requests that this is provided in sufficient time to allow proper review. APP-096 section 5.16 and table 5.17 set out that with regards to potential loss or harm affecting buried archaeological remains, that no further mitigation beyond existing commitments and no monitoring are proposed. With reference to APP-101 (and for example section 1.3.4.5), it is not clear to the Council what the referenced existing commitments are and how the baseline evidence supports the conclusions.

5.14 Given the wider Penwortham area, it is possible that there is archaeological potential in areas to be affected by the development, but as details of onshore connection infrastructure is as yet unknown, the Council remains unsure as to

how these impacts have been assessed, and considers the information provided to falls short of the level of detail required by the Council's Archaeologists.

- 5.15 Whilst APP-096 section 5.11.3.1 refers to the possibility that onshore works 'could' harm the heritage significance of designated heritage assets – in South Ribble's case primarily Hesketh Farm (Grade II), although other more remote assets are listed (Annex 5.1) a full assessment of any impact on heritage assets setting cannot be made until such time as details of National Grid connection assets proposed for Penwortham are confirmed. The assessment argues that Hesketh Farm (Grade II) has limited heritage significance however this is not agreed by the Council. The final scheme will be required to justify the 'harm' caused to the heritage significance of the listed building and it is not considered that this has not been adequately provided at this stage.
- 5.16 Additional information was received which confirmed the River Ribble Crossing has identified (see Figure 3.8 and Inset 4 – Figure 3.19, Volume 1: Figures) an approximately 150 m temporary working width, and 50 m permanent width. The proposals for installing a conventional underground cable tunnel trenchless installation technique, with tunnel headhouses, has been removed from proposals. The application now includes direct pipe, micro-tunnel trenchless installation techniques within the design envelope. The works are proposed to be bank to bank (i.e. no works will take place in the water) (CoT90 within the Commitments Register in Volume 1, Annex 5.3). As this information was received on the 14th of May 2025, limited time was available for the changes to be assessed by the Council's archaeologist however given the overlapping of temporary works required to the south of the River Ribble to accommodate this method including temporary access, working areas and construction compounds, the proposal leads to uncertainties as to how this would affect the grounds surrounding and therefore additional information relating to archaeology and heritage are required. Given the change in transmission, the presented archaeological or heritage impact assessment is likely to be flawed, and the Council would require updated information on how conclusions relating to this area of the development have been arrived at.

- Flood Risk

- 5.17 The proposal includes the installation of a 400kv grid connection cable corridor beneath the River Ribble, undertaken by direct pipe or micro tunnel trenchless installation techniques. The information within the application is not considered sufficient to determine how the proposed development would intercept with the existing land during and after construction and its consequential impacts on properties, highways and farmland in terms of flood risk and areas affected by surface water flooding. The information provided relating to the two new substations, temporary construction compounds, temporary and permanent access, and onward connections to the existing National Grid substation at Penwortham are also considered to be limited. The council is therefore unable to fully consider and review the proposal in

terms of flood risk and additional information is required in order to ensure appropriate measures are agreed and put in place to prevent increased flood risk for the area.

- Land Use and Recreation

- 5.17 The River Ribble Crossing has been identified (see Figure 3.8 and Inset 4 – Figure 3.19, Volume 1: Figures) to have a temporary working width of approx. 150m and 50m permanent width. APP-104 section 6.13 considers that the impact of development on agricultural holdings would be ‘low’ or negligible’ with a ‘minor adverse’ cumulative effect, however given the updated width it is considered that this conclusion may not be accurate. The impact on the land use would be significantly higher during construction than that during its permanent use given the significance disparity in widths which should be reflected in an up-to-date assessment.
- 5.18 APP-104 section 6.16 states that there would be permanent major adverse effect arising from the loss of Best and Most Versatile agricultural land during construction. The applicant states that this has been concluded on an appropriate worst case construction scenario however as previously requested, the Council would seek to review the significance of the effect across different construction scenarios, including direct pipe or micro tunnel trenchless installation as proposed, cable and substation construction and during non-concurrent development.
- 5.19 The Council acknowledge that the application is working on the basis of ‘short term’ impact as a period of months up to one year (Table 6.21 of Volume 3, Chapter 6: Land use and recreation (APP-104) with the applicant stating that no ‘long term temporary impacts’ are identified (Volume 3, Chapter 6: Land use and recreation (APP-104)). However, given the magnitude of the development and long-term impacts likely associated with the proposal in this location, the council does not consider that the proposal would fall within a ‘short term’ impact definition. The information presented at this stage is not considered to adequately justify the applicants conclusion.
- 5.20 The nature of intervention through agricultural land is unknown and the information provided on the post development restoration of the corridor areas is limited. There has been no obvious consideration of how long the land will take to come back to its natural state, whether that state will be suitable for its original purpose or of lesser character, and how long land would effectively be sterilised for. Table 6.17 of Volume 3, Chapter 6: Land use and recreation (APP-104), details that the Applicants have made a commitment (CoT08 of Volume 1, Annex 5.3: Commitments Register of the ES (AS-030)) to reinstate land temporarily affected as soon as possible following construction of the Transmission Assets however this is not specific to the 400kv Grid Connection Cable Corridor beneath the River Ribble through direct pipe or micro tunnel trenchless installation and therefore the Council cannot conclude the proposed restoration works would be ‘best practice’ as referred to by the applicant.

5.21 The Council is of the opinion that this analysis should consider all potential development scenarios, including non-concurrent development and notes that it may be the case that the impact should properly be categorised as greater than 'minor adverse' and that the proposals may therefore need to be amended accordingly. The Council also considers it appropriate that in its ongoing engagement with affected stakeholders, that the applicant properly quantifies the potential period of impact.

- Traffic and Transport

5.22 The submitted information lacks sufficient evidence to support the suitability or feasibility of some of the routeing proposals for highways, including structures within the highway, for this project. This includes whether the routes can support the project's vehicles, abnormal loads, or the impact on other users. There is also a concern about necessary rectification works post-delivery of abnormal loads, post-development delivery, or further impacts on the highway network during any development decommissioning. The document states that an assessment has been undertaken on the effects on transport including impact on driver delay, non-motorised delay, fear and intimidation, severance (caused by construction works/traffic), road safety etc however this is not specified to day/times and therefore the Council query how the applicant has concluded on this impact.

5.23 The applicant clarifies that core working hours for Transmission Assets are 07:00 to 19:00 (Monday to Saturday) which the Council considered to be excessive; particularly as traffic to and from the South Ribble developable area is down a very quiet, semi-rural road where residents should expect a level of residential amenity which this would not provide for. Regardless of the caveat restricting noisy activities, commercial and heavy vehicles passing residential property in this very quiet locality, and at such close proximity for 12hrs over a six-day period is inappropriate. The Council asks that these timescales are urgently addressed. Having regard to these hours of proposed construction, the Council is also concerned that pedestrian safety would be compromised. Howick Cross Lane is a narrow lane with few pavements, where heavy vehicles would not be expected during early and later hours of the day.

5.24 The information presented is not considered to adequately address routing and no engagement has been made with South Ribble Borough Council's Local Highway Authority and therefore the impact is inconclusive at this stage. Without said information, the council is unable to understand the likely significant damage to the highway (including structures) and as a consequence, the risk of road closures. In addition, the applicant also remains unclear how the development related damage to the highway will be overcome. Details of routing and associated impacts details above would be required in order for the Council to conclude and agree appropriate mitigation measures.

- 5.25 The application highlights the need to clear vegetation and other obstacles to facilitate access, which could lead to damage, compaction, reduced effectiveness of verges as drains, edge of carriageway deterioration, and safety issues for pedestrians. However, there is no commitment proposed to mitigate or fund damage to the public highway caused by the project. Where loss of trees, hedgerow or ecological habitat to provide for suitable, safe sightlines or other unexpected highway works are proposed, the Council requests that associated ecology and tree surveys are revisited.
- 5.26 The Council raises concerns of inconsistencies within the Outline Highway Access Management Plan. Some routes are too narrow for two HGVs to pass particularly within this remote location. The documentation assumes that two HGVs can pass within a 5.5m highway. This is flawed as it does not account for the width of HGVs with wing mirrors and the necessary gap between moving vehicles. There are additional requirements for the swept path of an HGV on non-straight carriageways. Some proposed highways are below 5.5m in width, presenting a safety issue. The council request clarity on the suggested road dimensions in order to avoid safety issues when the routes are used. Due to the remote and limited access within this area of South Ribble, the removal or temporary removal of footways would not be supported.
- 5.27 The submitted documentation has not considered the impacts on other developments that are currently being built, committed, or are the subject of planning applications. Additionally, it has not accounted for works required by utility companies that legally operate within the highway. The assertion that existing HGV Traffic Regulation Orders (TROs) determine the suitability of a route for HGVs is incorrect. HGV TROs are typically used in locations where minor roads have historically been part of a longer route, not necessarily aligned with the highway hierarchy. As such, it is concluded that there remains significant outstanding issues in relation to traffic, transport and highway safety which need to be addressed to ensure the safety and feasibility of the proposed routes.
- Noise and Vibration
- 5.28 With regards to potential impacts arising from noise and vibration, the Council notes that in APP-117 the applicant responds to a PINS query relating to the degree to which construction activities will occur concurrently. The applicant asserts that maximum impact will arise from concurrent development and that the assessment is therefore presented on this basis. However, duration of impact is fundamental to understanding the nature of noise and vibration impacts. Indeed, APP-035 section 1.12.8 acknowledges that some night-time working will be required, and it seems self-evident that a longer period of development would give rise to greater impacts in this regard. Therefore, the Council considers that other development scenarios should be considered, including those where development is not concurrent. It is also considered appropriate that noise is considered against revised construction hours as requested above.

- 5.29 APP-117 Table 8.3 states that *‘The core working hours for the construction of the landfall and onshore elements will be: • Monday to Saturday: 07:00 - 19:00 hours; • up to one hour before and after core working hours for mobilisation (“mobilisation period”) i.e. 06:00 to 20:00. Activities carried out during the mobilisation period will not generate significant noise levels (such as piling, or other such noisy activities)’*. App-117 section 1.12.8 however acknowledges that *‘some specific activities such as trenchless techniques and cable pull require periods of night-time working; however, the majority of works would occur during normal daytime construction working hours*. The applicant confirmed that prior agreement will be sought for undertaking activities outside of these core hours from the relevant planning authority (save for emergency works or trenchless installation where continuous 24-hour working is required) as per Requirement 14(3) of Schedule 2A and Schedule 2B of the draft DCO (AS-004). Notwithstanding this, the Council would seek this information to be presented at examination stage to allow understanding of the likely timeframes of this type of work required which will contribute to the overall planning balance.
- 5.30 Of the eight indicators relied upon in the assessment of human health impacts arising from noise exposure at ward level, set out in APP-035 section 1.7.6, only one has data available. The Council considers that for development with the potential for such significant impact, that either data should be found, or another methodology should be used.
- 5.31 In conclusion, it is not apparent that noise and vibration has been suitably considered, with full regard to increases as a consequence of construction and traffic movement, with suitable mitigation being provided to ensure that noise and vibration levels do not cause a concern to those impacted. A Requirement is recommended to continuously review noise and vibration levels and proactively manage construction traffic and construction to minimise impacts. This also includes the nighttime works required for cable pulling.
- Air Quality
- 5.32 The Council notes that the applicant sets out that the onshore infrastructure, once operational, will give rise to no direct emissions. This includes the substations, which it states in APP-121 table 9.5 *“Once operational, the substations will not have any emissions to air (such plant/stack emissions). Impacts arising from emissions from plant and stacks have been scoped out of the air quality assessment as agreed with the Planning Inspectorate.”* The Council questions how claims such as this can be made when on shore assets proposed for Penwortham have not been confirmed, assessed or granted permission.
- 5.33 The same assessment notes that the greatest potential for impact on air quality will arise during construction, by way of dust, with table 9.16 assessing the area and volume of that impact. However, the Council is concerned that the possibility of multiple repeat construction phases has not been properly considered. The assessment should consider the impacts arising from the

different likely development scenarios, which could include the development effectively being carried out three times, at least in part. Section 9.13.2.1 contradicts the assertion however by stating that '*cumulative effects arising during construction for transmission assets would be **not significant**.*'

- 5.34 Therefore, it is concluded that air quality has not been adequately addressed, particularly concerning the increases due to construction and traffic movements. Suitable mitigation measures have not been proposed to ensure that air quality remains unaffected. It is recommended to implement a requirement for continuous review of air quality monitoring data and proactive management of construction traffic to minimise the risk of exceedances.

- Public Rights of Way (PROW)

- 5.35 The application has not adequately addressed the impact of the developments on the amenity and quality of the user experience of the Public Rights of Way (PROW) network. This aspect needs to consider the effects on both the tourism industry and local communities. As it stands, the documentation makes no commitments and does not consider the needs of the community, focusing only on the process regarding changes and closures.

- 5.36 It is noted on plan BP-GBR-MORG-REG-0180: sheet 17 that the Ribble way (MC13B) and public right of way (MG13/A), and on sheet 18 that public rights of way MCMC11A/B and 14A/B would be temporarily restricted or closed. A more detailed idea of what 'temporary' in this case would be welcomed, so as to enable the Council to manage resident expectations. There is a lack of clarity regarding which rights of way will be open, diverted, or closed, and whether continuous alternative routes will be available. The strategy for situations where a PROW crosses a haul road, for example, is unclear. It is essential to agree on the principles at this stage to provide certainty to users. This process should follow legal requirements, with the developer providing mitigation measures to ensure safety is not compromised and the maximum potential usage of PROW is maintained.

Potential Offshore and Onshore Environmental Effects

- Seascape, landscape and visual resources

- 5.37 The applicant has confirmed that the four elements referred to in the submitted Landscape and Visual Resources' assessment (APP-123 – APP-127 are landfall, 400 kV grid connection cables, 400 kV grid connection cable corridor and onshore substations. The four elements are limited to onshore elements of the generation development. The Council considers that the in-combination effects of both the generation and transmission infrastructure must be considered to properly assess the impact on seascape, landscape and visual resources.

- 5.38 Whilst seascape assessment would impact primarily on Fylde Borough Councils area, landscape visual impact to and from South Ribble, and across

the River Ribble is relevant and must be considered in the planning balance. Policy 28 of the Central Lancashire Adopted Core Strategy relates to renewable and low carbon energy generation and require cumulative and cross-boundary impacts be considered. The loss of established parts of the natural environment must also be taken into account, and surveys adjusted where relevant. Howick and Priory ward has only 12.3% tree canopy cover – relatively low when compared to other wards in the area, and unnecessary loss of trees cannot be supported.

- Green Belt development

- 5.39 The assessment of overall climate impacts considers the cumulative impact of both transmission and generation assets, as summarised in APP-138 section 1.16. Most other parts of the application exclude consideration of in-combination effects of both generation and transmission assets. However, the Council supports the approach of properly considering the cumulative in-combination effects of both generation and transmission.
- 5.40 With regards to the proposed generation assets at Penwortham, it must be noted that this site is within land allocated as Green Belt. The National Planning Policy Framework 2024 at Para 160 and National Policy Statements EN-1 and EN-3 are clear that when located in the Green Belt, elements of many renewable energy projects will comprise inappropriate development, and approval would be dependent on demonstration of very special circumstances.
- 5.41 It is felt that the submission hereby considered is based on an assumption that permission for proposed onshore assets would automatically be approved through the planning process. The risk that this may not be the case does not appear to have been given sufficient weight in deliberations. Separately, the alternatives to the proposed connection site do not appear to have been fully provided. The Council would therefore expect to see evidence of a sequential test for land which is not Greenbelt, or a reduction in use of land which is Green Belt or otherwise protected such as for Areas of Separation.
- 5.42 It is noted that alternative locations for some infrastructure and routeing have been considered but these are limited to the Formby and Blackpool areas, and have regard primarily to environmental protection, when other areas of impact are also possible (residential amenity, loss of Green Belt land, economic disadvantage etc). It is noted that the only requirement from the National Energy System Operator was to connect to the national grid transmission network at Penwortham, yet this does not preclude a wider search to ensure that the agreed solution is the most appropriate having regard to impacts on communities, business, tourism and farmland, and damage to ecology/landscape/archaeology as well as cost. As detailed in paragraphs 5.2-5.5 above, it is considered that the information presented has not fully demonstrated the possibility of an alternative site than this sensitive location.

Socioeconomics

- 5.43 The Council acknowledges that there would be some limited economic impact in South Ribble during construction as farmland is sterilised, and out of action, although this is likely to be limited. Loss of residential amenity to those residents who currently work from home is likely to be more intense as traffic, noise, dust and general disruption occur. Clarity is required as to the impacts upon local residents, and the implications during periods when services and local infrastructure are unavailable for use during construction. Furthermore, limited information has been provided in terms of the benefits of the proposal for local residents. This could include for example, reduced energy costs for those in the immediate area or incentives to the residents who would be most affected by the development.

6.0 The Councils summary position

- 6.1 The Council welcomes the principle of the proposed development, recognising its potential to deliver national benefits through the reduction of carbon emissions from energy generation. This aligns with the Government's Clean Power Mission and broader policy objectives to double onshore wind capacity and meet clean energy targets in response to the climate crisis. The Council also acknowledges the likely creation of employment opportunities associated with the proposal, which, albeit temporary, would provide a degree of support to the local economy.
- 6.2 However, the Council notes that the National Planning Policy Guidance for Nationally Significant Infrastructure Projects advocates a front-loaded approach, whereby developers are expected to undertake meaningful consultation prior to submitting an application to the Planning Inspectorate. In this case, the Council considers that there are areas where this process has not been fully adhered to. Several assumptions appear to have been made based on incomplete or insufficiently justified documentation, and there remains a lack of clarity and certainty regarding the proposed mitigation measures.
- 6.3 The Council maintains that the information submitted to date does not adequately address all relevant matters, and as such, it is not in a position to reach a definitive conclusion on the issues outlined above. The Council has significant concerns regarding the proposed development of both the generation and transmission assets. It is the Council's view that the in-combination effects of these components must be assessed comprehensively across all relevant impact areas.
- 6.4 The Council is particularly concerned that the separation of the generation and transmission elements—alongside the assumption of a single phase of concurrent development for the transmission infrastructure—risks undermining a full and proper understanding of the project's cumulative impacts. While the applicant has referenced in-combination effects in the context of climate change assessments, the Council considers it inappropriate

to apply this selectively. Should the generation and transmission elements continue to be assessed independently, the Council asserts that the principle of development for the transmission infrastructure cannot be predicated on the existence of a generation application that has not yet been approved.

- 6.5 Furthermore, the Council is concerned about the potential for multiple, repeat phases of construction and the associated implications for noise and vibration, air quality, ecology, traffic and transport, agricultural land, and human health. The current assessment appears to rely solely on maximum impact scenarios, which may overlook specific risks arising from alternative or prolonged construction scenarios—such as extended night-time works—that could result in significantly greater harm, particularly to human health and ecological receptors. In the context of an agricultural setting, the Council considers that non-concurrent development could exacerbate these impacts. No clear short-, medium-, or long-term strategy has been presented to manage or mitigate these risks effectively.
- 6.6 The current information regarding the proposed corridor crossing of the River Ribble remains insufficiently defined. No updated archaeological or heritage assessments have been provided to enable a robust evaluation of the potential impacts associated with the proposed construction methodology. The Council reiterates its concern that the proposed measures lack sufficient clarity, raising further doubts about whether the associated actions, mitigation strategies, and compensation mechanisms can be appropriately secured, effectively implemented, and robustly monitored.
- 6.7 In conclusion, the Council maintains that the current information fails to adequately address several significant issues and, based on the information presently available, is unable to confirm its position on the application. The Council remains committed to working collaboratively with the applicant to resolve all outstanding matters in a proportionate manner and to ensure that sufficient detail is provided to satisfy both statutory consultees and affected communities. Until such time as appropriate evidence is submitted, and all impacts are demonstrably mitigated—both during construction and post-development—the Council will continue to raise its concerns with the Examining Authority. Accordingly, the Council reserves its final position at this stage.