



THE PLANNING ACT 2008

THE INFRASTRUCTURE PLANNING (EXAMINATION PROCEDURE) RULES
2010

Morgan and Morecambe Offshore Wind Farm: Transmission Assets

Appendix G3 to Natural England's Deadline 3 Submission
Natural England's further advice on Onshore Ecology and Nature Conservation

For:

The construction and operation of the Morgan and Morecambe Transmission Assets located approximately 0 - 37 km from the Northwest English Coast in the Irish Sea.

Planning Inspectorate Reference EN020028

07 July 2025

Appendix G3 Onshore Ecology and Nature Conservation

1. Summary of Detailed Comments

The information provided in this Appendix is to offer further explanation and/or clarification on some of the complex risk and issues raised at Relevant Representations [RR-1601] and in Natural England's Risk and Issues Log (Appendix K3) and to aid issue resolution. Unless new information is submitted into Examination or we are specifically asked about a risk/issue by the Examiner this will remain Natural England's final position.

The information provided below relating to soils is included in addition to Natural England's response to the Examining Authority's Written Questions 1 (ExQ1) [PD-008], Question 12.1.2. The points below each have the corresponding Risk and Issues Log (Appendix K3) reference number in brackets to identify the ongoing issue.

1.1. Impacts to Lytham St Annes Dunes SSSI (RI_G1)

Natural England attended a meeting under DAS with the Applicant on 12/06/25 to discuss their approach for producing the outline Hydrogeological Risk Assessment. Natural England understands the Hydrogeological Risk Assessment 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 ES. A hydrological model will also be presented.

However, we reiterated the need for further survey effort in order to help our understanding of likely impacts to the SSSI sand dune features, in particular the dune slacks and adjacent BHS supporting S41 Priority Sand Dune habitat. Dune slacks are ground water and rainwater dependant features. Therefore, we advise that the further data includes NVC surveys of the sand dunes, and installation of dipwells and dataloggers to monitor the position of the water table and to record potential fluctuations that may arise as part of the proposals over the lifetime of the project. We understand data from the abstraction borehole ref: GWA_01 may also be available and that the borehole itself may be able to help understand the position of the sites water table.

To date, the Applicant has presented a historical NVC survey of the SSSI (undertaken in 2016 by Skelcher for the Fylde Sand Dune Project Steering Group). However, this survey data is 9 years old and the survey does not cover the adjacent St Annes Old Links Golf Club which is the BHS.

Natural England also advised that the Applicant should consider in-combination effects of water abstraction at the golf course and the dewatering effects of cable installation including potential seasonal fluctuations i.e. during drier summer conditions.

1.2. ALC Survey Effort (RI_G6)

In the absence of a detailed, site-specific soil and Agricultural Land Classification (ALC) survey and assuming that all mapped ALC Grade 3 land are Best and Most Versatile (BMV) soils (i.e. Subgrade 3a), it is not possible to provide an accurate baseline and demonstrate the likely potential impacts. So, whilst any mitigation may be regarded as precautionary, it means that the Applicant is unable to show how it avoids impacts to BMV soils nor the design of potential mitigation to safeguard the soil resources.

The Environmental Statement (ES) should quantify the areas of land according to Grades 1 to 5 of the ALC, including differentiating between Grades 3a and 3b. While Natural England recognises the Applicant's acknowledgement of the deficiencies within the provisional dataset and that provisional mapping provides an indication of the ALC grade, and thus the potential impact on BMV agricultural land; it does not provide the soil details required to inform soil management which would feed into the Soil Management Plan. There is a risk of soil damage, ALC degradation and long term or permanent loss of BMV soils from cable installation. Soil will need to be handled according to best practice and reinstated to a high standard to reduce the impacts. The results from a detailed ALC survey would provide soils data to inform a soil management plan for the whole site regardless of whether the use is permanent or temporary in nature and provide the Secretary of State with the necessary comfort in the mitigation measures.

Once the ALC dataset is complete, it should be clearly presented within the ES, including a detailed breakdown of land take, and the proportion of BMV land, for each component of the onshore infrastructure associated with the development. This includes substations, cable corridors, construction compounds, access tracks, and any mitigation or enhancement areas. Such transparency is essential to inform the Secretary of States determination of the proposal's overall impact on agricultural land quality and soil health. Given that each

infrastructure element may exert different pressures on soil structure, function, and long-term productivity, these distinctions should be explicitly addressed within the outline Soil Management Plan (SMP) to ensure appropriate mitigation and restoration strategies can be put in place. The SMP should then be finalised once the final design parameters are known and signed off by the Local Planning Authority in consultation with the relevant SNCB.

1.3. Assessment of Deep Peat (RI_G7)

Natural England reiterates that there is insufficient information on the impacts on peat; where the Applicant has considered impacts on deep peaty soils this has been combined with other elements such as loss of BMV land, ground gas generation on human health and other receptors and in the context of deposits of geoarchaeological and paleoenvironmental interest. Further evidence and surveys specifically on peat are therefore required.

Natural England acknowledges that additional measures are included in the outline Soils Management Plan [APP-200], but we advise there is insufficient assessment to understand if these measures will be effective. We advise to resolve this issue the Applicant needs to consider the mitigation hierarchy, and if the peat is restorable. We advise in the first instance that impacts should be avoided where possible through the design of an appropriate scheme, if there is sufficient evidence for why this cannot be done mitigation or compensation may be required.

The surveys should be completed pre-determination of the DCO, as identification of restorable peat may require changes to the design of the project in order to avoid the peat.

1.4. ALC data presented in the Environmental Statement (RI_G11)

Natural England acknowledges the Applicant's effort to provide a conservative, worst-case assessment of agricultural land quality by applying the highest ALC grade within mixed soil types. However, in line with Paragraph 5.11.34 of the Overarching National Policy Statement for Energy (EN-1), it is essential that development proposals demonstrate how the use of Best and Most Versatile (BMV) land, Grades 1, 2, and 3a, has been avoided where possible, and that any unavoidable impacts are clearly justified and appropriately mitigated.

While the Applicant has presented ALC data and committed to further surveys prior to construction, Natural England remains concerned that the current assessment may not fully demonstrate how impacts to BMV land has been minimised across all elements of the

Transmission Assets. The reliance on a worst-case assumption, while precautionary, does not substitute for a spatially explicit breakdown of BMV land take by infrastructure component, nor does it confirm whether alternative routing or siting options were considered to reduce BMV land losses.

To align with national policy, Natural England recommends that the Applicant:

- Clearly demonstrate how the layout has sought to avoid BMV land;
- Provide a transparent breakdown of BMV land affected by each infrastructure element; and
- Ensures that the forthcoming detailed Soil Management Plan includes enforceable measures to protect and restore BMV soils during and after construction.

This approach will help ensure that the proposal meets the policy expectation to avoid or mitigate impacts on valuable soil resources wherever feasible.

1.5. Soil Handling (RI_G12)

It is Natural England's advice that all soils should only be handled in a dry and friable condition, and it is expected that construction programmes would restrict soil handling to the drier summer period to minimise risk of soil damage (April through September) as far as reasonably practicable. This would minimise the possibility for on-site delays due to rainfall in the winter period, as well as the need to recondition soils, which requires additional space and time. Where this is not possible, clear additional management measures should be outlined, in line with DEFRA guidance. This is particularly important for land to be restored to agricultural use.

Natural England advises that when soils are destined for long-term storage, it is essential that they are handled only when in a dry and friable condition to preserve their structure, biological integrity, and long-term fertility. To further protect the stored soil from erosion, nutrient loss, and degradation, sufficient time should be allowed for the establishment of a green cover, such as a fast-growing grass or cover crop, which stabilises the surface, enhances microbial activity, and helps maintain soil health during the storage period. This approach aligns with best practice in sustainable land management and ensures that soils remain viable for future restoration or reuse.