

**APPLICATION BY MORGAN OFFSHORE WIND LIMITED AND  
MORECAMBE OFFSHORE WINDFARM LIMITED FOR A  
DEVELOPMENT CONSENT ORDER FOR THE MORGAN AND  
MORECAMBE OFFSHORE WIND FARMS TRANSMISSION ASSETS  
DEADLINE 4 ADDITIONAL SUBMISSION BY LANCASHIRE COUNTY  
COUNCIL**

**14<sup>th</sup> AUGUST 2025**

## **1. Introduction**

- 1.1. The following sets out Lancashire County Council's Deadline 4 additional submission in relation to landscape matters for the Development Consent Order for the Morecambe Offshore Windfarm Transmission Assets Generation Assets ('the Scheme'). The submission has been made following the Issue Specific Hearings (ISH) of 29<sup>th</sup> and 30<sup>th</sup> (ISH2) and 31<sup>st</sup> July 2025 (ISH3).
- 1.2. The County Council submitted its main Deadline 4 submission on the 8<sup>th</sup> August 2025. The additional submission which is included as Appendix A to this report, comprises a Landscape and Technical Note.
- 1.3. The County Council understands that the applicants have submitted a revised Greenbelt Technical Note since ISH2 and ISH3. The County Council consequently envisages the submission of a further additional submission in response to the applicant's submission of the revised Green Belt Technical Note, once it has had the opportunity to consider this.

## **Appendix A - LCC Deadline 4 Additional Submission on Landscape (ISH Item 2)**

**Ref: Planning Inspectorate No: EN020032**

**PROPOSAL: MORGAN AND MORECAMBE OFFSHORE WIND FARMS  
TRANSMISSION ASSETS NATIONALLY SIGNIFICANT  
INFRASTRUCTURE PROJECT**

**DEADLINE 3/4 - RESPONSE TO LANDSCAPE MATTERS;**

**relating to the Inspector's request for Comments on Landscape  
Technical Note (07 July 2025) at Item Specific Hearing 2 (ISH2)  
Planning Hearing 29<sup>th</sup> July 2025, by LCC Landscape Architect**

**LANDSCAPE COMMENTS**

**1.0 Introduction**

1.1 This document makes reference to the above document. It should be read in conjunction with comments from FBC Landscape Architect.

**2.0 Comments**

2.1 Ref 1.2.3.3 of the document references tree replacements being like for like. N.B. where trees to be removed may be Ash (with dieback) these to be replaced with *Quercus robur* (Oak).

2.2 Ref 1.2.3.5 Any approved scheme to include full Landscape Drawings (in accordance with JCLI (Landscape Institute) stages of work), as well as a written documentation for approval.

2.3 Ref 1.2.3.8, 1.2.4.5, 1.2.5.5, 1.2.6.10, 1.2.8.8 and 1.2.9.7. The Applicant makes repetitive claims (as quoted) within the document, that LCC Landscape had a meeting to discuss '*landscape matters*' and '*the design process*'. Whilst this may have been the intention, at this meeting the Applicant focussed discussions on Greenbelt issues for the majority of the meeting. Only circa 10 minutes of an approximate hour long meeting contained landscape issues. Landscape matters have therefore not been discussed in any detail to date.

2.3.1 It is misleading to repeatedly document in this manner and misinform the process.

2.4 Ref 1.2.5.2 notes that only at Detail Design are matters regarding levels / profiles agreed. Albeit the finite detail may be agreed at Detail Design, fundamentals need to be agreed. It is otherwise not acceptable to state this, given the size and scale of the built forms proposed. There is a reliance here on the flexibility afforded to Infrastructure projects, rather than best practice of what would be provided for any other large scale project. This manner of information would otherwise be provided upfront, to help satisfy Planning Authorities that Proposals confer with 'Good Design'. It is impossible to enable Planning Authorities to guide this process, to propose sustainable solutions to what is a totally inappropriate development in the greenbelt, in such a sensitive location. It is essential to agree these principles at this stage, as opportunities would not be forthcoming at a later stage in the process.

- 2.5 Ref 1.2.5.3 The only manner to check this would be to commission specific landscape consultants to check this process is correct, as has been noted previously. The timescale of this process does not allow this. If a GL (Ground Level) isn't known how can a photomontage be created? If it is known just state it-be honest.
- 2.6 Ref 1.2.5.4 See 2.15-18 below
- 2.7 Ref.1.2.6.2-5 Note that the purpose and importance of the recommended off site planting is not just for residents, but for users of the various PRow's and for the benefit of businesses, which rely and depend on attractive views for their commercial asset (Norcross Caravan Park).
- 2.7.1 Equally it is considered that the site area alone is of insufficient size to enable adequate mitigation, hence the recommendation for off-site planting. The Applicant states (1.2.6.5), that the siting of the substations and mitigation is located to minimise landscape and visual effects. This seems unlikely, otherwise why would a Greenbelt location be selected, it has obvious benefits and attributes over an area of open countryside without this designation and the Greenbelt here works alongside an adjacent Area of Separation. It is questioned whether adequate mitigation could ever be sufficient in terms of Landscape Character. The Proposed Development would irretrievably change the open green appearance and long views and small scale intimate landscape which currently exist.
- 2.8 Ref 1.2.6.8 The Applicant accepts that fully mitigating the proposed Substations is unfeasible, but it is disagreed, that mitigation as is stated, '*reflects the receiving landscape context*'. In plain English... the Applicant has not demonstrated how the proposed Substation and mitigation has and can '*reflect*' the '*receiving*' (existing) '*landscape context*' (Landscape Character). Please clarify how openness and green open agricultural fields are retained, how mitigation in terms of tree planting reflects the small woodland blocks. How small scale intimate agricultural landscape is retained? Reflect in this context means 'think deeply about' or echoes? It might 'think' about the landscape character but this scale of this urban development does not echo it.
- 2.9 Ref 1.2.6.9 See FBC Landscape Architect comments regarding trenchless techniques under existing trees.
- 2.10 Ref 1.2.6.11 At this stage in the process the exact detailing of species is not of major concern, rather the principles of the development.
- 2.11 Ref 1.2.7.1-2 See 2.15-18 below.
- 2.12 Ref 1.2.8.3 With Reference to Table 1 : It is not considered that commitments have been sufficiently refined or fixed and are indeed some way from this.
- 2.13 Ref 1.2.8.6 Reads as an oxymoron. Landscape led but only when Detail and Content is fixed?
- 2.14 The Applicants state that they want to engage proactively. It is suggested that the conversation should be a two-way process, not simply a presentation of facts of the Applicant viewpoint and an investigation of how to best present their case. The Applicant needs to avoid constantly cross referencing Commitments and other documents (the limits and extents of which are generally already understood) and really aim to think

laterally and innovatively with regards to environmental matters and push the boundaries of the Proposed Development for the benefit of the landscape and the people and wildlife that live within it.

## 2.15 Layout Examples:

### 2.15.1 Hornsea Two Offshore Wond Converter Station:

On the image as provided it is difficult to assess within the landscape setting and context. With assessment on Google Maps however, it is clear to see that the context is very different from the Greenbelt site of the Proposed Morgan and Morecambe Substations.

Firstly the area appears overwhelmingly flat (characteristic of Norfolk), therefore the horizontal view would be limited. Secondly the 'receiving' landscape is much larger scale landscape than the Proposed Morgan and Morecambe Substation sites. This is clearly evident by the field size, likely supporting intensive farming and where the lost smaller scale field pattern (visible), has clearly been removed. Thirdly the Hornsea Converter Station is very near existing built infrastructure projects, including an existing Oil Refinery, Killingholme Power Station and an array of urban land uses, therefore effectively forms part of this context. Very different to this Greenbelt setting.

### 2.15.2 Rayleigh main Substation

The image indicates a large scale landscape. When assessing on Google Maps, the Substation appears to be set into an area where the landscape has for the main part lost its predominant characteristics and piecemeal development is happening throughout. There will only be a number of years before the whole area is urbanised with pockets of green space within. It might take a couple of decades but it will happen. This understanding originates from studying the historic layering of OS Maps over time when carrying out Landscape Character Assessments. The same impacts would occur adjacent to the Proposed Morgan Substation Site in particular.

### 2.15.3 The Imatra Substation

It is difficult to locate exactly on Google Maps, but the landscape type is again different, characterised with a very densely coniferous wooded landscape, affording year round screening and enabling different land uses to be integrated much more easily, than a Greenbelt site, characterised by its openness, long views and agricultural and potentially long standing or ancient land use.

### 2.15.4 It is stated therefore that the Substations indicated as examples relate in terms of being large scale urban entities, however have completely different landscape context and setting to the Greenbelt locations of the Proposed Morgan and Morecambe Substations.

## 2.16 Topographic Context:

### 2.16.1 It can be clearly seen that Morecambe Substation is proposed to be located on the top of the higher area of the plateau, thus accentuating its location in the landscape and be clearly and easily visible and dominant feature to the users of the various PRoW south and Bridleway to the north (as has been previously noted in comments on Views).

### 2.16.2 For the Morgan Substation two levels are quoted and it is not feasible to check which is relevant without cross-sections confirming levels. This information is not provided. Again

it is clear to see that the Substation is proposed on the higher part of the ridgeline and that abruptly falling levels to the east would significantly limit the ability to screen with vegetation.

- 2.16.3 More contour levels would have been useful, but suffice to note that levels towards Newton-with-Scales and north of the A583 rise to 20m+ AOD.
- 2.16.4 Limiting factors to screening mitigation include cable runs in/ out of Substation areas and it has been queried how deep cables could be (in regards to sinking of built features into the landscape), to enable significant depths of soil medium above cables to allow mitigation planting?
- 2.16.5 Equally Off-site planting creating new hedgerows with trees or reinforcing existing hedgerows and trees, possibly the creation of small woodland blocks, all building in to the landscape pattern would enable better screening and mitigation, than currently proposed.
- 2.16.6 The Contours and topographic pattern clearly illustrate the small-medium scale nature of the landscape, the small scale field pattern, the intricacies of this landscape and therefore the inappropriateness of such large scale impositions and built form within the landscape type.

## 2.17 Cross-Sections

- 2.17.1 Once again minimal information is presented, providing limited information- this does not demonstrate that the Applicant wants to '*engage proactively*'.
- 2.17.2 There are means of drawing Cross-Sections to aid legibility, unfortunately this isn't demonstrated here. Firstly the Applicants emphasize horizontal scale at the expense of vertical scale. Making the cross-section smaller in extent (the whole valley isn't necessary) would enable a larger vertical scale to aid legibility. Equally no scale is even depicted, which is very poor, as is not illustrating the context of the Substation alongside the cross-section to enable a proper assessment of effects. This is such bad practice and makes the cross-section somewhat purposeless.

If it is known that vertical scale will be ridiculously small (as here), the vertical scale can be doubled, for clarity. As long as the scale is annotated adjacent the cross-section (as is good practice) the cross section can be read correctly. Representing in this manner is not proactively engaging.

- 2.17.3 There are other anomalies, such as vegetation as far as the extent of the Dow Brook, I had understood there to be meadow/ grass within the immediate extended area? (even on the cross section indicated). Secondly the hedgerows adjacent the Bridleway appear at least 2m + height, whereas the landscape pattern is 1.5m from September onwards and only at back end summer is a higher height expected. Note also trees cannot be planted in hedgerows where cable runs exist.
- 2.17.4 In terms of detail...no additional fence is desirable for aesthetic purposes directly adjacent to the Dow Brook, rather 'hide' this within planting.
- 2.17.5 The cross sections and the lack of scale information and emphasis on protracted horizontal do not allow assessment, as to whether reduced levels would significantly reduce visual effects (it would of course completely adversely affect landscape

character). It would have been expected to propose gentle mounding alongside reduced levels to aid screening, this isn't indicated. Again it is emphasized that insufficient space exists within the site boundary (without off-site planting) to effectively screen/ mitigate the proposed height and appearance of structures.

## 2.18 Indicative Substation Layouts

2.18.1 It would be useful to understand which larger of the structures are positioned where (orientation), in relation to the landscape, as without this, the effects cannot be accurately assessed.

2.18.2 It is presumed re: Morecambe that reference to 15m height and not 13m is due to the indicative status.

## 2.19 Meetings

2.19.1 It is considered that face to face meetings, as opposed to Teams Meetings would be more constructive. The latter are too formal, with too many people involved, which do not allow discussions in an open context over a plan by the specific landscape architects.

## 2.20 Proactive Engagement

2.20.1 There needs to be a greater extent of lateral and innovative consideration, incorporation and detail of the issues noted throughout what appears the constant repetition of comments.

Louise Eccles  
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