



The Planning Inspectorate

**Our ref:**

XA/2025/100445/01

By email

**Your ref:**

EN020032

[morganandmorecambeowfta@planninginspectorate.gov.uk](mailto:morganandmorecambeowfta@planninginspectorate.gov.uk)

**Date:**

22 September 2025

Dear Sir

**MORGAN AND MORECAMBE OFFSHORE WINDFARMS TRANSMISSION ASSETS:**

**DEADLINE 5 – COMMENTS ON SUBMISSIONS RECEIVED BY DEADLINE 4.**

We have reviewed relevant submissions received by Deadline 4 and would like to make the following comments:

- [REP4-008] Draft Development Consent Order (Tracked) - Rev F05 – comments as per the Environment Agency position below.
- [REP4-021, REP4-023, REP4-25] Environmental Statement Volume 3 Annex 2.3: Flood risk assessment – Parts 1 to 3 (Tracked) - Rev F04. Comments as per Annex A.
- [REP4-027] Outline Code of Construction Practice (Tracked) - Rev F03 - comments as per the Environment Agency position below.
- [REP4-081] S\_D1\_6.6 Environment Agency SoCG - Rev F03 – Agreed
- [REP4-096] Applicants' Response to Deadline 3 submissions from Statutory Consultees and other organisation: Environment Agency (REP3-079, REP3-080, REP3-081)  
Comments regarding Table 2.1 (Environment Agency REP3-079 – Environment Agency's Response to ExQ1):-
  - Q2.3.3 – As per our response at Deadline 4, the EA have reconsidered our position regarding the wording of Requirement 12 and we are now satisfied with the current wording of Reg.12 (1) (b) '...where works have the potential to impact wetland habitats'.
  - For all other questions the Environment Agency agrees with the Applicant's response presented in Table 2.1.

## Environment Agency position

Our position at Deadline 5 regarding the points raised in our Relevant Representation [RR-0677] and Written Representation [REP1-076], and responding to the Applicant's response provided at Deadline 3 [REP3-052], is set out below.

Ref RR-0677	Topic	Position at Deadline 2	REP1-076	Position at Deadline 3	REP2-056	Position at Deadline 4	Position at Deadline 5
0677.3	<b>Flood Risk</b> EA requests early involvement in detailed project design	This matter is on-going. To ensure there is adequate consultation through the use of Protective Provisions and the disapplication of FRAPS.	076.6	<i>This matter is on-going.</i> We share the Applicant's view that protective provisions will be agreed before the end of Examination. To ensure there is adequate consultation through the use of Protective Provisions and the disapplication of FRAPS.	056.6	<b><i>This matter is on-going.</i></b> Discussions are on-going. The EA have responded to the Applicant's updates to the EA's standard Protective Provisions. We fully expect that protective provisions will be agreed before the end of Examination.  The EA have provided comment on the revised Flood Risk Assessment, and look forward to reviewing a final version for D5.	<b><i>This matter can be closed.</i></b>  We have reviewed an amended FRA, V04. We are satisfied we have no further flood risk critical comments to make.  There are some minor clerical errors that should be corrected for accuracy. These are not material to the assessment of flood risk. We do not need to review the documents again once these errors have been corrected.
0677.4	<b>Geology</b> Hydrogeological Risk	This matter is on-going. Hydrogeological risk assessment (HyRA) for all HDD or any other	076.7	<i>This matter is on-going.</i> [REP2-005] draft DCO - We are satisfied that Hydrogeological risk	056.7	<b><i>This matter is on-going.</i></b>	<b><i>This part of the matter can be closed:</i></b> We note the amendments to

	Assessment required.	trenchless utility installation methods is proposed to be secured through Requirement 8. We are satisfied with this approach, but for clarity, a hydrogeological risk assessment must be listed under sub-paragraph (2) of Requirement 8 of the dDCO [APP-005]. An outline Hydrogeological risk assessment should be provided in support of the Outline CoCP [APP-193]		assessment (HyRA) is now listed under Requirement 8 para (2) (o), The amendment currently specifies Lytham St Annes SSSI, <b>but we request that it also specify the River Ribble crossing for consideration in the outline HyRA.</b>  We await the submission of the outline HyRA for review at Deadline 3.		We maintain our position that Requirement 8 para (20) (o) should also include specific mention of the River Ribble crossing.  We have provided comments on the draft HyRA submitted at D3 and look forward to reviewing an amended version for D5.	Requirement 8 para (20) (o) and in [REP4-027] oCoCP para 1.8.2.22.  <b><i>This part of the matter is on-going:</i></b> We have agreed a strategy to ensure the Outline HyRA covers our concerns. We look forward to reviewing the final version of the Outline HyRA to be submitted at D5.
	Foundation Works Risk Assessment required.	A Foundation Works Risk Assessment is proposed to be secured through Requirement 8. We are satisfied with this approach, but for clarity, a Foundation Works risk assessment must be listed under sub-paragraph (2) of Requirement 8 of the dDCO [APP-005].		We are satisfied that the need for a Foundation Works Risk Assessment, where suspected contamination is present and deep foundation works are proposed, is covered under Requirement 8, and we withdraw our request that it be listed under sub-para.(2).	056.7	<b><i>This matter is on-going.</i></b>  Regarding the wording in [REP3-019] Outline Code of Construction Practice (Tracked) - Rev F02, the EA is seeking amended wording to ensure that references to deep piling will also	<b><i>This matter can be closed.</i></b>  We note the inclusion of the wording ‘ <i>or deep foundation works.</i> ’ in CoT103 and [REP4-027] oCoCP para 1.8.2.17.

				<p><b>However, to provide assurance that this Requirement will cover all potential foundation works that may create a risk of pollution, we request the following amended wording to [APP-193] outline CoCP, Geology and ground conditions para 1.7.2.17:</b></p> <p>“...Where suspected contamination is present and piling <i>or deep foundation works</i> are proposed, detailed <i>foundation works</i> risk assessment(s) will be developed...”</p>	<p>include other deep foundation works.</p> <p>At Deadline 3 we proposed amended wording regarding ‘<i>deep foundation works</i>’ for inclusion at para 1.7.2.17 -18. We since acknowledge the Applicant’s position that this suggested amended wording may be difficult to define.</p> <p>We would propose an alternative wording of:</p> <p>“Where suspected contamination is present and piling <u><i>or other deep foundation works where there is a likelihood of interaction with groundwater</i></u> is proposed, detailed piling risk assessments will be developed....”</p>	
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0677.7	Protective Provisions	This matter is on-going. We are in on-going discussion regarding the final form of the protective provisions.	076.11	<i>This matter is on-going.</i> We are in on-going discussion regarding the final form of the protective provisions.	056.9	<b><i>This matter is on-going.</i></b> The EA have now provided comment on the Applicant's proposed edits to the EA standard PP wording. We are in on-going discussion and fully expect to agree protective provisions before the end of examination.	<b><i>This matter is on-going.</i></b> There are two comments that remain to be resolved. The outstanding points relate to cessation of works where this may cause damage; and the Applicants' ability to review plans of any Agency works which may cause damage to the cables. We are in on-going discussion and expect to close out these points in advance of Deadline 6.
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Yours faithfully

[Redacted]

Planning Specialist – National Infrastructure Team

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**Annex A:** Our ref. XA/2025/100400/02-L01 **Comments regarding: FLOOD RISK ASSESSMENT REV.04 [REP4-021] [REP4-023], [REP4-025]**

## Annex A



The Planning Inspectorate

**Our ref:** XA/2025/100400/02-L01

By email

**Your ref:** FRA

[morganandmorecambeowfta@planninginspectorate.gov.uk](mailto:morganandmorecambeowfta@planninginspectorate.gov.uk)

**Date:** 16 September 2025

Dear Sir

### **Comments regarding: FLOOD RISK ASSESSMENT REV.04 [REP4-021] [REP4-023], [REP4-025]**

We have reviewed the following documents:

- The Applicants response to the Environment Agency's comments received 04 June 2025 on the Volume 3, Annex 2.3: Flood risk assessment - part 1 of 3 Version F03 May 2025 (REP1-025)
- Environmental Statement Volume 3, Annex 2.3: Flood risk assessment - F04 (Parts 1-3) [REP4-021] [REP4-023], [REP4-025]

We are satisfied that our previous comments (our ref. XA/2025/100400/01-L01 dated 04 July 2025) have been incorporated in the revised documents. We have no further flood risk critical comments to make.

However, we have identified some minor clerical errors that should be addressed for accuracy. None of these are material to the assessment of understanding of flood risk. We do not need to review the documents again once these clerical errors have been addressed.

<b>Volume 3, Annex 2.3: Flood risk assessment - part 1</b>			
	<b>Issue</b>	<b>Impact</b>	<b>Solution</b>
Page 87-93  Figures	There don't appear to be any figure reference titles to the Figures on these pages only drawing titles.	It is unclear if this is intentional but could lead to problems referencing.	Add figure reference numbers.

<b>Volume 3, Annex 2.3: Flood risk assessment - part 2</b>			
	<b>Issue</b>	<b>Impact</b>	<b>Solution</b>

Flood defences 1.6.2.4 Page 131	The Environment has been changed to 'Environmental' Agency Spatial Flood Defences.	No impact, but no reason why it should have been changed.	Change 'Environmental' back to Environment Agency.
Page 162	The drawing does not have a figure title.	Seem like an oversight to not have a figure title.	Include drawing title.
Pages 163-166	Changing in titles and figure numbers appears to have resulted in a discrepancy between the new figure label in the report and the figure reference in the original title box of the drawing.	This makes references somewhat problematic and confusing.	Clerical error requiring correction

**Volume 3, Annex 2.3: Flood risk assessment part 3**

	<p>Like previous comments.</p> <p>Changing in titles and figure numbers appears to have resulted in a discrepancy between the new figure label in the report and the figure reference in the original title box of the drawing.</p> <p>e.g. Figure 1.23: Undefined 1% AEP fluvial event plus 20% climate change uplift on Page 199 is figure 1.17 in the drawing title box.</p>	This makes referencing somewhat problematic and confusing.	Clerical error requiring correction
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Yours faithfully



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