THE PLANNING ACT 2008

THE INFRASTRUCTURE PLANNING (EXAMINATION PROCEDURE) RULES 2010

Morgan and Morecambe Offshore Wind Farm: Transmission Assets

Appendix G5.1 to Natural England's Deadline 5 Submission
Natural England's further advice on Onshore Ecology - Soils

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

22 September 2025

Appendix G5.1 Natural England's further advice on soils

In formulating this advice, the following documents have been considered:

- [REP1-043] Annex 5.7 to the Applicants response to Hearing Action Points: ISH1 45 Agricultural Land Classification Surveys;
- [REP3-017] Environmental Statement - Volume 3, Annex 5.6: Interim trial trenching report; and
- [REP4-041] Outline Soil Management Plan.

1.1 Summary

Following the provision of our advice below, Natural England will not be engaging further on soil related matters unless there is a change in the Applicant's position. We believe that the advice provided in our Relevant Representations [RR-1601] and throughout examination is unlikely to change.

Natural England continues to advise that an Agricultural Land Classification (ALC) survey is conducted across the site.

Our rationale for advising that ALC surveys are undertaken to inform consent, is because ALC surveys provide essential insights into the site's agricultural land quality and soil properties, which inform the Environmental Impact Assessment (EIA); site micro-siting, soil handling and restoration, and suitability for various uses, allowing for informed and effective decision-making.

This is particularly important where significant impacts to BMV Agricultural Land and irreplaceable peat are likely. Without the necessary evidence, Natural England is unable to further advise and/or provide guidance with any certainty on the scale and significance of risk and effectiveness of mitigation measures.

Natural England hopes that the results of ALC surveys could be made available during Examination or at the latest in the pre-determination phase in order to provide the necessary soils advice and resolve this issue.

1.2 Response to the Applicant's response to Hearing Action Points: ISHI 45 Agricultural Land Classification Surveys [REP1-043]

Natural England notes that the Applicant submitted a response to the Hearing Action Points ISHI 45 ALC Surveys at Deadline 1 [REP1-043]. We provided a response to this in Q12.1.2 of the ExA's written questions within Natural England's response at Deadline 3 [REP3-093]. However, we have included the following advice by way of clarification:

The Applicant's document [REP1-043] highlighted examples of ALC survey work undertaken for other Offshore Wind Farm (OWF) DCO's, together with responses from Natural England in relation to each project. The OWF examples given in this document were; Hornsea Project Three, Hornsea Project Four, North Falls, Five Estuaries and Mona OWFs. We highlight to the Applicant that Natural England's advice is provided on best available evidence, guidance and/or understanding at moment in time, on a case-by-case basis and can vary depending on the location and land type, which is potentially impacted. We highlight that several of the Project's noted above were either not situated within areas of BMV Agricultural Land or impacts were addressed from the outset through project design and/or mitigation commitments. In reference to offshore wind farm developments in Welsh waters (i.e. Mona), Natural England's approach differs from that of Welsh Government. This is summarised in Natural England's Position Statement: Use of ALC Data in Land Use Planning.

We also highlight to the Applicant and the ExA that the advice Natural England has provided in relation to ALC Surveys for Morgan and Morecambe Transmission Assets is appropriate for the level of potential risk posed by the project currently under examination. However, we do highlight that it is consistent with the advice provided for Outer Dowsing OWF (Relevant Representations [Project Ref: RR-045]) and Dogger Bank D (PEIR response). These projects are situated in a more comparable study area with regards to the presence of BMV Agricultural Land within the Order Limits of the proposals.

Therefore, Natural England will not be engaging further on REP1-043 or any other rebuttal-style documents which compares our advice to different Projects located in other areas of the UK and/or were examined outside of the current tranche of Round 4 and Extension projects.

1.3 Natural England's position on the Applicant's ALC survey effort (NE Ref: RI_G6)

The following advice was submitted into Examination at Deadline 3 in Natural England's '*Appendix G3 further advice on Onshore Ecology and Nature Conservation*' [REP3-093]. We reiterate the advice below as Natural England's final position on the matter and how this can be resolved during Examination:

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.

1.4 Natural England's position on ALC data presented in the Environmental Statement (NE Ref: RI_G11)

The following advice was submitted into Examination at Deadline 3 in Natural England's '*Appendix G3 further advice on Onshore Ecology and Nature Conservation* ' [REP3-093]. We

reiterate the advice below as Natural England's final position on the matter and how this can be resolved during Examination:

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 Natural England's position on Soil Handling (NE Ref: RI_G12)

The following advice was submitted into Examination at Deadline 3 in Natural England's '*Appendix G3 further advice on Onshore Ecology and Nature Conservation*' [REP3-093]. We reiterate the advice below as Natural England's final position on the matter and how this can be resolved during Examination:

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.

1.6 Further advice on the Applicant's Assessment of Deep Peat (NE Ref: RI_G7) and [REP3-017]

In addition to the advice provided in Section 1.3 of [REP3-093] regarding peat, we have provided further advice below following the Applicant's submission of the updated interim trial trenching report at Deadline 3 [REP3-017]:

Natural England highlighted the potential presence of peat in its previous Relevant Representation response [RR-1601], which is now confirmed by the findings presented in '*Volume 3, Annex 5.6: Interim Trial Trenching Report'* [REP3-017]. In light of these confirmed peat occurrences, we advise that a detailed peat survey should be carried out to establish peat depth, condition, and extent, ensuring that appropriate management and mitigation measures can be developed and adopted.

We advise that a soil resource survey can utilise the soil data collected as part of a detailed ALC survey so it is sensible to plan both surveys in tandem at an early stage to save time and resource. A soil resource survey may require some limited extra data collection, for example for soil pH and nutrient analysis, to inform the most suitable habitat the soils can support in habitat creation areas.

The soil resource survey will also enable the accurate identification of the extent and boundary of peat and peaty soils for the baseline. Where peat soils are identified, a peat survey should be undertaken to determine the depth and condition of the peat. We therefore refer the Applicant (and ExA) to The Scottish Government, Scottish Natural Heritage, SEPA (2017) *Peatland Survey: Guidance on Developments on Peatland, is referred to in both Chapter 13 and Appendix 13A*. This guidance states that at scoping, a low-resolution peat survey should be undertaken to determine the depth of the peat at a density of 100m x 100m on a regular grid pattern across the whole area proposed for development, which is consistent with the survey frequency of the detailed ALC survey. Where deep peat soils supporting peat habitat are identified, a higher resolution survey may be necessary.