THE PLANNING ACT 2008

THE INFRASTRUCTURE PLANNING (EXAMINATION PROCEDURE) RULES 2010

Morgan and Morecambe Offshore Wind Farm: Transmission Assets

Appendix G5.3 to Natural England's Deadline 5 Submission
Natural England's comments on Outline Landfall Construction Method Statement [AS-081]

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 G5.3 Natural England's advice on Outline Landfall Construction Method Statement [AS-081]

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

- [AS-081] S_D4_22 Outline Landfall Construction Method Statement

1. Summary

Natural England welcomes the submission of this outline statement into Examination. However, it does not fully address the concerns we have raised. Detailed comments are provided below and in Appendix B5 where relevant to physical processes and benthic ecology. Where applicable updates are also reflected in Natural England's Risk & Issues Log (Appendix K5).

2. Detailed comments

Table 1. Natural England's advice on Outline Landfall Construction Method Statement

Document reviewed: [AS-081] Outline Landfall Construction Method Statement			
NE Ref	**Section**	**Key Concern and/or Update**	**Natural England's Advice to Resolve Issue**
1	Table 1, CoT18	With regard to the core working hours, further clarification is needed on how these relate to tide times when working in the intertidal zone, i.e. do the core working hours provide a sufficient low tide working window between 7am and 7pm.	We advise that the wording of the commitment should be updated to note the consideration of tides.
2	Table 1, CoT39	The SMP Explorer provides information on the sand dunes at this location (SMP 11B2.1 https://environment.data.gov.uk/shoreline-planning/unit/SMP22/11B2.1) It highlights that the sand dunes are considered as a Flood Defence Asset - and the SMP management for this section notes *Continue dune maintenance to allow them to function as a defence along approximate current alignment.* It goes on to say "*Where the intention is to maintain the flood or erosion risk management performance of a natural feature such as dune system, spit, or shingle barrier. This does not always mean fixing its position. The approach might involve active management of the feature or its surroundings to increase its width, length, height, or resilience. It does not involve building structures on or behind the natural feature."*	We advise that for any works during construction and operational phases of the project which are within 8m of the outer edge of the dunes, consideration is required as to their flood defence value (and a Flood Risk Activity Permit is needed). In addition, we highlight that the sand dunes here are accreting, and as can be seen from aerial photographs, extend beyond the boundary of Lytham St. Annes Dunes SSSI (into the Ribble Estuary SSSI) boundary. While the Ribble Estuary SSSI is not notified for sand dunes, they are mentioned as supporting an interest feature "Assemblages of breeding birds - **Sand-dunes** and saltmarshes".
3	Table 1, CoT44	Natural England notes the commitment includes the following sentence "*… The exit pits associated with the direct pipe installation will be at least 100 m seaward of the western boundary of the SSSI."*	We advise that the commitment should clarify the SSSI, i.e. "*The exit pits associated with the direct pipe installation will be at least 100 m seaward of the western boundary of the Lytham St Annes SSSI".*

		We advise that this area also sits within the Ribble Estuary SSSI, therefore the commitment needs to be specific when naming a SSSI. As noted in point 2, the sand dunes here have accreted beyond the SSSI boundary (from a measurement of aerial photos - this is approximately 50m from the Lytham St Annes SSSI boundary) - which means works will only be 50m from the edge of the strandline/ embryo/ mobile dunes. Over time this distance is likely to decrease further. CoT44 is also referenced in Paragraph 1.7.1.2 and Paragraph 1.13.3.2 - Stage 3 (point 2).	We advise that CoT44 should include detail that the exit pits and associated works will avoid direct and indirect impacts to accreting strandline/ embryo/ mobile dunes. We look forward to sight of the NVC survey report which should have identified the seaward position of the dunes and include further details as to their composition, structure and function. We advise CoT44 could also be added to Paragraph 1.13.3.3 where it discusses the siting of Construction Compound 2 on the beach.
4	Table 1, CoT85	Natural England notes the commitment which includes the temporary haul roads will be installed using meable gravel aggregate. The track (42A42B) shown in Figure 1 and Figure 2 of the document runs along the outer edge of the accreting dunes - starting at the construction compound 1 and ending at construction compound 2. Paragraph 1.12.1.4 goes onto say that it will be a maximum of 6m wide but will not encroach onto the SSSI (which again should refer to *Lytham St Annes SSSI* as it does encroach onto the Ribble Estuary SSSI). The document here does note "*that removable track matting or similar membrane may also be required to transition from the track to the beach*".	From our experience on other projects where aggregate has spread across the designated site, we advise that further information/ detail on where the gravel aggregate will be used and an impact assessment is provided prior to consent to ensure that suitable mitigation measures can be adopted. If the gravel is intended to be used in the locations shown in the figures we advise that the use of gravel here is not appropriate as it could get intermixed with the sand and be difficult to remove at the end of works (i.e. as set out in CoT08) and an alternative trackway should be considered. This point is now included in the R&I Log (RI_G48).
5	1.8.1.1	Natural England welcomes the reference to potential hydrological monitoring with a borehole and	We advise that the NVC survey results should inform our understanding of ground water hydrology. However, we

		piezometer for ongoing data on ground water hydrology.	advise that the hydrological monitoring should also be secured in a commitment.
6	Table 2	We welcome the information included in table 2. Some further detail on the relevant Work Areas would be useful to add clarity.	We advise that the information in Table 2 should refer to the Work Area Codes used in Figure 1 – 3.
7	1.8.11	Section 1.2.2 states the purpose of the document is to set out key elements of the construction methodology and environmental considerations including future site-specific surveys which will be required, especially for trenchless techniques below sensitive receptors. Whilst we acknowledge some of these site-specific surveys are set out in Table 1 and the existing commitments, Section 1.8.1 does not set out what future site specific surveys will be required to inform the design of the cable installation. The wording in this section is non-committal and does not give certainty over which surveys will be undertaken, and states that surveys 'may' be undertaken and 'could include'.	We advise as this document forms the Outline Landfall Construction Method Statement, it should clearly set out what future surveys will need to be undertaken to inform the detailed design of the proposal, to ensure at this stage the scope of the surveys will be sufficient to avoid impacts to ecological receptors. We advise the wording in the document should be strengthened to secure the commitment to undertaking these surveys post-decision and that where there are residual concerns in relation to recovery, monitoring will be undertaken with a requirement to undertake remediation, should impacts be greater than predicted.
8	1.13.4.2 – Stage 4	Natural England advises that further clarification is required on the drill punch-out on the beach, which notes "*The dry upper beach section will be excavated to bury the cable using the open-cut method*".	We advise the Applicant to clarify where this will be as it is unclear if it will be seaward of the TJB, or within the upper part of the beach where the dunes are accreting.