



# MORGAN AND MORECAMBE OFFSHORE WIND FARMS: TRANSMISSION ASSETS

## Public Sector Equality Duty Statement



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## Glossary

Term	Meaning
<del>400 kV grid connection cables</del>	<del>Cables that will connect the proposed onshore substations to the existing National Grid Penwortham substation.</del>
<del>400 kV grid connection cable corridor</del>	<del>The corridor within which the 400 kV grid connection cables will be located.</del>
Applicants	Morgan Offshore Wind Limited (Morgan OWL) and Morecambe Offshore Windfarm Ltd (Morecambe OWL).
Biodiversity benefit	<p>An approach to development that leaves biodiversity in a better state than before. Where a development has an impact on biodiversity, developers are encouraged to provide an increase in appropriate natural habitat and ecological features over and above that being affected.</p> <p><del>For the Transmission Assets, biodiversity benefit will be delivered within identified biodiversity benefit areas within the Onshore Order Limits. Further qualitative benefits to biodiversity are proposed via potential collaboration with stakeholders and local groups, contributing to existing plans and programmes, both within and outside the Order Limits.</del></p>
Code of Construction Practice	A document detailing the overarching principles of construction, contractor protocols, construction-related environmental management measures, pollution prevention measures, the selection of appropriate construction techniques and monitoring processes.
Commitment	This term is used interchangeably with mitigation and enhancement measures. The purpose of commitments is to avoid, prevent, reduce or, if possible, offset significant adverse environmental effects. Primary and tertiary commitments are taken into account and embedded within the assessment set out in the ES.
<del>Construction Traffic Management Plan</del>	<del>A document detailing the construction traffic routes for heavy goods vehicles and personnel travel, protocols for delivery of Abnormal Indivisible Loads to site, measures for road cleaning and sustainable site travel measures.</del>
Design envelope	<del>A description of the range of possible elements and parameters that make up the Transmission Assets options under consideration, as set out in detail in Volume 1, Chapter 3: Project Description. This envelope is used to define the Transmission Assets for EIA purposes when the exact engineering parameters are not yet known. This is also referred to as the Maximum Design Scenario or Rochdale Envelope approach.</del>
Development Consent Order	An order made under the Planning Act 2008, as amended, granting development consent.
Direct pipe	<del>A cable installation technique which involves the use of a mini (or micro) tunnel boring machine and a hydraulic (or other) thruster rig to directly install a steel pipe between two points.</del>
Environmental Impact Assessment	The process of identifying and assessing the significant effects likely to arise from a project. This requires consideration of the likely changes to the environment, where these arise as a consequence of a project, through comparison with the existing and projected future baseline conditions.
Environmental Statement	The document presenting the results of the Environmental Impact Assessment process.

Term	Meaning
<del>Evidence Plan Process</del>	<del>A voluntary consultation process with specialist stakeholders to agree the approach to, and information to support, the EIA and Habitats Regulations Assessment processes for certain topics.</del>
<del>Generation Assets</del>	<del>The generation assets associated with the Morgan Offshore Wind Project and the Morecambe Offshore Windfarm include the offshore wind turbines, inter-array cables, offshore substation platforms and platform link (interconnector) cables to connect offshore substations.</del>
<del>Intertidal area</del>	<del>The area between Mean High Water Springs and Mean Low Water Springs.</del>
<del>Intertidal Infrastructure Area</del>	<del>The temporary and permanent areas between MLWS and MHWS.</del>
<del>Landfall</del>	<del>The area in which the offshore export cables make landfall (come on shore) and the transitional area between the offshore cabling and the onshore cabling. This term applies to the entire landfall area at Lytham St. Annes between Mean Low Water Springs and the transition joint bay inclusive of all construction works, including the offshore and onshore cable routes, intertidal working area and landfall compound(s).</del>
Local Authority	A body empowered by law to exercise various statutory functions for a particular area of the United Kingdom. This includes County Councils, District Councils and County Borough Councils.
<del>Local Highway Authority</del>	<del>A body responsible for the public highways in a particular area of England and Wales, as defined in the Highways Act 1980.</del>
<del>Main rivers</del>	<del>The term used to describe a watercourse designated as a Main River under the Water Resources Act 1991 and shown on the Main River Map. These are usually larger rivers or streams and are managed by the Environment Agency.</del>
<del>Marine licence</del>	<del>The Marine and Coastal Access Act 2009 requires a marine licence to be obtained for licensable marine activities. Section 149A of the Planning Act 2008 allows an applicant for to apply for 'deemed marine licences' in English waters as part of the development consent process</del>
<del>Maximum design scenario</del>	<del>The realistic worst case scenario, selected on a topic specific and impact specific basis, from a range of potential parameters for the Transmission Assets.</del>
<del>Mean High Water Springs</del>	<del>The height of mean high water during spring tides in a year.</del>
<del>Mean Low Water Springs</del>	<del>The height of mean low water during spring tides in a year.</del>
<del>Micro-tunnel / micro-tunnelling</del>	<del>A tunnelling technique involving the use of a hydraulic (or other) jacking rig and a mini (or micro) tunnel boring machine to install a concrete tunnel between two points.</del>
Mitigation measures	This term is used interchangeably with Commitments. The purpose of such measures is to avoid, prevent, reduce or, if possible, offset significant adverse environmental effects.
<del>Morecambe Offshore Windfarm: Generation Assets</del>	<del>The offshore generation assets and associated activities for the Morecambe Offshore Windfarm.</del>
<del>Morecambe Offshore Windfarm: Transmission Assets</del>	<del>The offshore export cables, landfall, and onshore infrastructure required to connect the Morecambe Offshore Windfarm to the National Grid.</del>

Term	Meaning
Morecambe OWL	Morecambe Offshore Windfarm Ltd is owned by Copenhagen Infrastructure Partners' (CIP) fifth flagship fund, Copenhagen Infrastructure V (CI V).
Morgan and Morecambe Offshore Wind Farms: Transmission Assets	The offshore export cables, landfall, and onshore infrastructure for the Morgan Offshore Wind Project and the Morecambe Offshore Windfarm. This includes the offshore export cables, landfall site, onshore export cables, onshore substations, 400 kV grid connection cables and associated grid connection infrastructure such as circuit breaker compounds.  Also referred to in this report as the Transmission Assets, for ease of reading.
<del>Morgan Offshore Wind Project: Generation Assets</del>	<del>The offshore generation assets and associated activities for the Morgan Offshore Wind Project.</del>
<del>Morgan Offshore Wind Project: Transmission Assets</del>	<del>The offshore export cables, landfall and onshore infrastructure required to connect the Morgan Offshore Wind Project to the National Grid.</del>
Morgan OWL	Morgan Offshore Wind Limited is a joint venture between JERA Nex bp (JNbp and Energie Baden-Württemberg AG (EnBW).
<del>National Grid Penwortham substation</del>	<del>The existing National Grid substation at Penwortham, Lancashire.</del>
<del>National Policy Statement(s)</del>	<del>The current national policy statements published by the Department for Energy and Net Zero in 2023 and adopted in 2024.</del>
<del>Offshore booster station</del>	<del>A fixed structure located along the offshore export cable route, containing electrical equipment to ensure bulk wind farm capacity can be fully transmitted to the onshore substations.</del>
<del>Offshore substation platform(s)</del>	<del>A fixed structure located within the wind farm sites, containing electrical equipment to aggregate the power from the wind turbine generators and convert it into a more suitable form for export to shore.</del>
<del>Offshore export cables</del>	<del>The cables which would bring electricity from the Generation Assets to the landfall.</del>
<del>Offshore export cable corridor</del>	<del>The corridor within which the offshore export cables will be located.</del>
<del>Offshore Permanent Infrastructure Area</del>	<del>The area within the Transmission Assets Offshore Order Limits (up to MLWS) where the permanent offshore electrical infrastructure (i.e. offshore export cables) will be located.</del>
<del>Offshore Order Limits</del>	<del>See Transmission Assets Order Limits: Offshore (below).</del>
<del>Offshore substation platform(s)</del>	<del>A fixed structure located within the wind farm sites, containing electrical equipment to aggregate the power from the wind turbine generators and convert it into a more suitable form for export to shore.</del>
<del>Onshore export cables</del>	<del>The cables which would bring electricity from the landfall to the onshore substations.</del>
<del>Onshore export cable corridor</del>	<del>The corridor within which the onshore export cables will be located.</del>
<del>Onshore Infrastructure Area</del>	<del>The area within the Transmission Assets Order Limits landward of MHWS. Comprising the offshore export cable corridor from MHWS to the transition joint bay, onshore export cable corridor, onshore substations and 400 kV grid connection cable corridor, and associated temporary and permanent infrastructure including temporary and permanent compound areas and accesses. Those parts of the</del>



Term	Meaning
	<del>Transmission Assets Order Limits proposed only for ecological mitigation and/or biodiversity benefit are excluded from this area.</del>
<del>Onshore Order Limits</del>	<del>See Transmission Assets Order Limits: Onshore (below).</del>
<del>Onshore substations</del>	<del>The onshore substations will include a substation for the Morgan Offshore Wind Project: Transmission Assets and a substation for the Morecambe Offshore Windfarm: Transmission Assets. These will each comprise a compound containing the electrical components for transforming the power supplied from the generation assets to 400 kV and to adjust the power quality and power factor, as required to meet the UK Grid Code for supply to the National Grid.</del>
Preliminary Environmental Information Report	A report that provides preliminary environmental information in accordance with the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017. This is information that enables consultees to understand the likely significant environmental effects of a project, and which helps to inform consultation responses.
<del>Renewable energy</del>	<del>Energy from a source that is not depleted when used, such as wind or solar power.</del>
<del>Scour protection</del>	<del>Protective materials to avoid sediment being eroded away from the base of the foundations due to the flow of water.</del>
<del>Substation</del>	<del>Part of an electrical transmission and distribution system. Substations transform voltage from high to low, or the reverse by means of electrical transformers.</del>
<del>The Secretary of State for Energy Security and Net Zero</del>	<del>The decision maker with regards to the application for development consent for the Transmission Assets.</del>
<del>Transmission Assets</del>	<del>See Morgan and Morecambe Offshore Wind Farms: Transmission Assets (above).</del>
Transmission Assets Order Limits	The area within which all components of the Transmission Assets will be located, including areas required on a temporary basis during construction and/or decommissioning (such as construction compounds).
<del>Transmission Assets Order Limits: Offshore</del>	<del>The area within which all components of the Transmission Assets seaward of Mean Low Water Springs will be located, including areas required on a temporary basis during construction and/or decommissioning.</del> <del>Also referred to in this report as the Offshore Order Limits, for ease of reading.</del>
<del>Transmission Assets Order Limits: Onshore</del>	<del>The area within which all components of the Transmission Assets landward of Mean High Water Springs will be located, including areas required on a temporary basis during construction and/or decommissioning (such as construction compounds).</del> <del>Also referred to in this report as the Onshore Order Limits, for ease of reading.</del>

## Acronyms

Acronym	Meaning
AIS	<del>Air Insulated Switchgear</del>
AOD	<del>Above Ordnance Datum</del>
BCA	<del>Bilateral Grid Connection Agreement</del>
CoCP	Code of Construction Practice
CoT	<del>Project Commitment</del>
CBRA	<del>Cable Burial Risk Assessment</del>
CfD	<del>Contracts for Difference</del>
CMS	<del>Construction Method Statement</del>
CSIP	<del>Cable Specification and Installation Plan</del>
CTMP	<del>Construction Traffic Management Plan</del>
DCO	Development Consent Order
DECC	<del>Department of Energy and Climate Change</del>
Defra	<del>Department for Environment, Food and Rural Affairs</del>
DESNZ	<del>Department for Energy Security &amp; Net Zero</del>
dML	<del>Deemed Marine Licence</del>
EnBW	<del>Energie Baden-Württemberg AG</del>
EIA	Environmental Impact Assessment
EMP	<del>Environmental Management Plan</del>
EPP	<del>Evidence Plan Process</del>
ES	Environmental Statement
<a href="#">EWGNTS</a>	<del>Expert Working Group</del> <a href="#">Non-Technical Summary</a>
GIS	<del>Gas Insulated Switchgear</del>
HDD	<del>Horizontal Directional Drilling</del>
HGV	<del>Heavy goods vehicle</del>
HNDR	<del>Holistic Network Design Review</del>
HVAC	<del>High Voltage Alternating Current</del>
IALA	<del>International Association of Marine Aids to Navigation and Lighthouse Authorities</del>
IAQM	<del>Institute of Air Quality Management</del>
LAT	<del>Lowest Astronomical Tide</del>
MCA	<del>Maritime and Coastguard Agency</del>
MCZ	<del>Marine Conservation Zone</del>
MDS	<del>Maximum Design Scenario</del>



Acronym	Meaning
MHWS	Mean High Water Springs
MLWS	Mean Low Water Springs
MMO	Marine Management Organisation
MPS	Marine Policy Statement
MTBM	Mini (or micro) tunnel boring machine
NGESO	National Grid Electricity System Operator
NPS	National Policy Statement
NSIP	Nationally Significant Infrastructure Project
O&M	Operation and Maintenance
OSP	Offshore Substation Platform
OTNR	Offshore Transmission Network Review
PDE	Project Design Envelope
PEIR	Preliminary Environmental Information Report
PPP	Pollution Prevention Plan
PRoWPSSED	Public rights of waySector Equality Duty
SACSoS	Special AreasSecretary of ConservationState
SAR	Search and Rescue
SPA	Special Protection Area
SNCBs	Statutory Nature Conservation Bodies
SSSI	Sit of Special Scientific Interest
SWMP	Site Waste Management Plan
TEP	Technical Engagement Plan
TJB	Transition Joint Bay
UK	United Kingdom
UXO	Unexploded Ordnance
WSI	Written scheme of investigation

## Units

Unit	Description
%	Percentage
dB	Decibels
Kg	Kilogram
kHz	Kilohertz

Unit	Description
<del>KJ</del>	<del>Kilojoules</del>
<del>km</del>	<del>Kilometres</del>
<del>km<sup>2</sup></del>	<del>Kilometres squared</del>
<del>kV</del>	<del>Kilovolt</del>
m	Metres
<del>m<sup>2</sup></del>	<del>Metres squared</del>
<del>m<sup>3</sup></del>	<del>Metres cubed</del>
<del>nm</del>	<del>Nautical mile</del>
<del>μPa</del>	<del>micropascal</del>

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# 1 Public Sector Equality Duty Statement

## 1.1 Introduction and Summary

- 1.1.1.1 All public sector acquiring authorities are bound by the Public Sector Equality Duty (PSED) as set out in Section 149 of the Equality Act 2010 (the 2010 Act). The Applicants are not public sector entities; however, the Secretary of State (SoS) must have regard to these obligations in exercising its function in determining the Morgan and Morecambe Offshore Wind Farms: Transmission Assets application (the Application).
- 1.1.1.2 The Applicants have provided a comprehensive assessment of the potential impacts of the project on receptor groups within Volume 1, Annex 5.1: Human Health (the Human Health Annex) (APP-035).
- 1.1.1.3 Section 1.11.5.1 of the Human Health Annex (APP-035) identifies vulnerable groups which are considered within the assessment and how the sensitivity of those groups has been taken into account. Vulnerable groups include children and young people, older people, low income groups, people with existing poor health including disability, those who share protected characteristics under the Equality Act 2010, and people living in deprivation.
- 1.1.1.4 As detailed at section 1.3.3, the assessment within the Human Health Annex (APP-035) considers the potential impacts of the Transmission Assets on vulnerable groups in various contexts, individually and cumulatively.
- 1.1.1.5 The Applicants have committed to extensive mitigation and control measures secured through the Outline Code of Construction Practice (CoCP) (APP-193) and associated management plans.
- 1.1.1.6 Therefore, this statement does not repeat the assessment as set out in APP-035; this statement provides a summary of the general duty of public sector acquiring authorities under the PSED, the extent to which it applies to the Applicants, how the Applicants have been mindful of the duty, and how the duty should be applied through Examination procedure.
- 1.1.1.7 This statement ~~has been~~[was](#) updated at Deadline 5 at the request of the Examining Authority. As further engagement is ongoing in relation to the measures secured in the Outline Noise and Vibration Management Plan (J1.3/F03) and the Outline Communications Plan (J1.1/F04) in relation to Wrea Green Equitation Centre the Applicants expect to update this statement further at an appropriate deadline prior to the close the examination.
- [1.1.1.8 This statement was further updated at Deadline 6 to reflect and capture discussions with Wrea Green Equitation Centre and further updates to the Outline Communications Plan \(J1.1/F05\) and Outline Construction Noise and Vibration Management Plan \(J1.3/F04\).](#)

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## 1.2 The Public Sector Equality Duty (PSED)

- 1.2.1.1 The general duty under section 149 of the 2010 Act is threefold, prescribing that public authorities must in the exercise of their functions have due regard to the need to:
- a) exclude unlawful behaviour, including victimisation, harassment and discrimination, against those who have a protected characteristic;
  - b) advance equality of opportunity between persons who have a protected characteristic and those who do not; and
  - c) foster good relations between persons who share a relevant protected characteristic and those who do not.
- 1.2.1.2 Importantly, this “due regard” duty does not require a particular outcome. It is a procedural requirement for the decision maker to be conscious of the duty placed on them when reaching their decision. Any decision maker must be cognisant of how the decision could impact groups with protected characteristics.
- 1.2.1.3 The PSED will apply to the ~~Secretary of State (SoS)~~ in its determination of the Application. The duty will extend to the Planning Inspectorate and the Examining Authority (ExA), and to relevant local authorities in discharging any DCO requirements.
- 1.2.1.4 Private companies such as Morgan OWL and Morecambe OWL are not public authorities for the purposes of the public sector equality duty.
- 1.2.1.5 Whilst the Applicants acknowledge that s149(2) of the 2010 Act states that ‘*a person who is not a public authority but who exercises public functions must, in the exercise of those functions, have due regard to the matters mentioned in subsection (1)*’, preparation and submission of the DCO application and participation in the examination are not functions of a public nature.
- 1.2.1.6 The only point at which the PSED may apply to the Applicants would be at the point of exercise of compulsory acquisition or temporary possession powers on the basis that could fall under s149(2) i.e. a non-public authority exercising a public function.

## 1.3 How the Applicants have taken into account relevant provisions in the 2010 Act

- 1.3.1.1 In preparing the Application, the Applicants have been mindful of the PSED which the SoS, the Planning Inspectorate and the ExA must have regard to as decision-making public authorities.
- 1.3.1.2 Although [with the identified mitigations in place](#) no aspect of the Morgan and Morecambe Offshore Wind Farms: Transmission Assets (the project) would affect the protected characteristics of anyone in the community, at the request of the Examining Authority in its Rule 6 letter, the Applicants have drawn together in this Statement the information included within the Application to assist the Planning Inspectorate, ExA and the SoS in carrying out their duties.-

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## 1.3.2 Pre-application Consultation

- 1.3.2.1 As set out in the Consultation Report (APP-170) and its accompanying annexes (APP-171 to APP-188), the Applicants undertook statutory and non-statutory consultation and engagement prior to submission of the Application. This included having regard to equal opportunities and diversity throughout the consultation process (see section 2.3.1.4 of APP-170). For example:
- Consultation brochures for both non-statutory and statutory stages of consultation clearly set out that readers could request the information in alternative (more accessible) formats.
  - All consultation events were organised in accessible venues.
- 1.3.2.2 To provide access to the consultation to the digitally disadvantaged, a suite of hard-copy consultation materials including the brochure, feedback form, PEIR Non-Technical Summary (PEIR NTS) and Statement of Community Consultation (SoCC) was also made available at seven deposit locations across the Project area (see Table 4.2 of the Consultation Report (APP-170) for a list of the deposit locations used during the Applicants' statutory consultation). During the statutory consultation, the Applicants were contacted by a member of the public requesting that a British Sign Language interpreter attend an event. A special session was organised prior to the advertised consultation event on 10 November 2023 at Fylde Rugby Club to facilitate this (see Section 4.1.11.6 of the Consultation Report) (APP-170). The same member of the public contacted the Applicants requesting a further session. This took place on 15 March 2024 at the Boulevard Hotel with a British Sign Language interpreter in attendance. Subsequently, the member of the public submitted a response to the statutory consultation, with assistance provided by the British Sign Language interpreter. Whilst the feedback was submitted after the close of the statutory consultation period, the Applicants accepted and considered the feedback.

## 1.3.3 Consideration in the Environmental Statement: vulnerable groups

- 1.3.3.1 The Applicants have provided a comprehensive assessment of the potential impacts of the project on "vulnerable groups" within the Human Health Annex (APP-035). Vulnerable groups are defined in section 1.11.5 of APP-035 to include children and young people, older people, low income groups, people with existing poor health including disability, those who share protected characteristics under the Equality Act 2010, and people living in deprivation (including those experiencing income and/or access and geographic vulnerability).
- 1.3.3.2 The assessment within the Human Health Annex (APP-035) considers the potential impacts of the Transmission Assets on vulnerable groups in the context of the following:
- a) transport modes, access and connections (section 1.12.2 of APP-035),

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- b) open space leisure and play (section 1.12.3 of APP-035),
  - c) socio-economic factors (section 1.12.4 of APP-035),
  - d) air quality (section 1.12.5 of APP-035),
  - e) water quality (section 1.12.6 of APP-035),
  - f) land quality (section 1.12.7 of APP-035),
  - g) noise and vibration (section 1.12.8 of APP-035), and
  - h) risk (including EMF) (section 1.12.9 of APP-035)

- 1.3.3.3 The Human Health Annex (APP-035) concludes that there would be minor adverse, non-significant effects in EIA terms on vulnerable groups as a result of the construction of the development in relation to the impacts listed at 1.3.3.2 (a), (b), (d), (e), (g) and (h) above. It also concludes minor beneficial (not significant in EIA terms) effects on vulnerable groups in relation to socio-economic impacts (1.3.3.2 (c) above). These conclusions take account of mitigation measures to be applied in respect of the relevant impacts as set out in each Environmental Statement topic chapter. The assessment considers potential impacts both individually and cumulatively (see section 1.13 of APP-035 for consideration of cumulative effects).
- 1.3.3.4 The Applicants have committed to extensive mitigation and control measures secured through the Outline Code of Construction Practice (APP-193) and associated management plans (secured by Requirement 8 in Schedules 2A and 2B of the draft Development Consent Order (DCO) (AS-004)). This includes the management of noise, dust and pollution during construction.
- 1.3.3.5 The Applicants are conscious that a number of relevant representations raised concerns about the proximity of the Project to schools, a care home and the Wrea Green Equitation Centre. The Applicants have responded to those concerns in their Procedural deadline A Submission - 3.1 The Applicants' Response to Relevant Representations Part 1 - Introduction and thematic responses (PDA-005). This demonstrates how the Applicants have undertaken a rigorous and robust route planning and site selection process in relation to the onshore infrastructure for the Transmission Assets. This included the siting of infrastructure at a distance from sensitive receptors such as schools and care homes.
- 1.3.3.6 A full reasoning and justification for the site selection of the onshore infrastructure, including the range of criteria used and developed throughout the iterative process is provided in Section 4.9 of Volume 1, Chapter 4: Site Selection and Consideration of Alternatives (AS-026). This is also supported by Volume 1, Annex 4.3: Selection and Refinement of the Onshore Infrastructure (APP-033) .

## **1.3.4 Schools and care homes**

- 1.3.4.1 The nearest school (Carr Hill High School) is approximately 330 m from the Transmission Assets Order Limits (i.e. the closest point to the school building at which construction activities for the access bellmouth to the Morgan onshore substation could take place). Strike Lane Primary

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School is approximately 400 m from the Transmission Assets Order Limits (i.e. the ~~closest~~[closest](#) point to the school at which the onshore export cables construction activities could take place (Work No.34A34B)).

- 1.3.4.2 The nearest care home (Century Healthcare Care Home) is approximately 35m from the Transmission Assets Order Limits (i.e. the closest point to the care home at which the offshore export cables could be installed). At this location the cables will be installed using trenchless techniques as part of a continuous drill from the Transition Joint Bays in Blackpool Airport to the exit at Lytham St Annes Beach. This is captured in the works descriptions in Schedule 1 of the draft DCO (AS-004) and CoT44 of Volume 1, Annex 5.3: Commitments Register of the ES (AS-030) which confirms that the installation of the offshore export cables under Lytham St. Annes Dunes SSSI and the St. Anne's Old Links Golf Course will be undertaken by trenchless installation technique. This is also secured by Requirement 8 within Schedules 2A and 2B of the draft Development Consent Order (AS-004).
- 1.3.4.3 Section 8.11.2, of Volume 3, Chapter 8: Noise and Vibration (APP-117) has assessed the potential impacts of construction of the Transmission Assets on the care home and concluded that with appropriate mitigation which is secured through the draft DCO (AS-004), the potential effects would be minor adverse, which is not significant in Environmental Impact Assessment (EIA) terms. The appropriate mitigation is secured through Requirement 8 of the dDCO (AS-004) requires the CoCP be developed in accordance with the Outline CoCP (APP-193) to include a construction noise and vibration management plan (developed in accordance with its associated outline plan (APP-196)).
- 1.3.4.4 The Outline Noise and Vibration Management Plan has been updated during examination (J1.3/F03) to give specific consideration regarding to the control of noise and vibration at receptors as having increased sensitivity or requiring receptor specific mitigation such as schools, equestrian facilities and care homes. This is reflected in the update to CoT79 of the Commitments Register (F1.5.3/F05) submitted at Deadline 5. The Applicants will engage with these receptors during the detailed design stage to further understand their use and identify any receptor specific and vibration limits and mitigation measures will be required to minimise construction noise and vibration impacts. These specific limits and mitigation measures will be included in the detailed Construction Noise and Vibration Management Plan for approval by the relevant planning authority in accordance with Requirement 8 of the draft DCO. This will ensure that, if needed, specific mitigation measures that consider any protected characteristics of these receptors are in place.
- 1.3.4.5 In addition, the Applicants have proposed a construction noise limit at Century Care Home within Table 1.4 of the Outline Noise and Vibration Management Plan to acknowledge the increased sensitivity of the care home. The actual Significant Observed Adverse Effect Level to be applied at this receptor will be confirmed in the Detailed Construction Noise and Vibration Management Plan.



1.3.4.6 In addition, the outline Construction Artificial Light Management Emissions Plan (J1.11/F03) has been updated during examination to give specific consideration regarding the control of artificial lighting at receptors as having increased sensitivity or requiring receptor specific mitigation such as care homes. As will be done in relation to noise and vibration the Applicants will engage with these receptors during the detailed design stage to further understand their use and identify any receptor specific and mitigation measures that will be required to minimise artificial lighting impacts. These specific mitigation measures will be included in the detailed Construction Artificial Light Management Emissions Plan for approval by the relevant planning authority in accordance with Requirement 8 of the draft DCO. This will ensure that, if needed, specific mitigation measures that consider any protected characteristics of these receptors are in place.

## 1.3.5 Wrea Green Equitation Centre

1.3.5.1 Section 6.11.4 of Volume 3, Chapter 6: Land Use and Recreation (APP-104) has assessed the construction effects that have the potential impact onto affect users of recreational resources (including and in particular Wrea Green Equitation Centre (a horse riding school which caters for disabled users and young people) and Midgeland Riding School) and where specific concerns have been raised given the protected characteristics of the users).

1.3.5.2 The assessment has focussed on the potential impacts on the operation of the businesses, resulting from:

- the potential impacts of noise, vibration, visual disturbance and odour from construction works on the horses at the facilities; and
- in the context of Wrea Green, the effect this would have on disabled users and young people.

~~1.3.5.1~~ 1.3.5.3 The assessment concluded that with appropriate mitigation secured through the draft DCO (AS-004) the potential effects would be minor adverse, which is not significant in Environmental Impact Assessment (EIA) terms. The appropriate mitigation is secured through requirement 8 of the draft DCO (AS-004) which requires the CoCP developed in accordance with the Outline CoCP (APP-193) for a relevant stage to include a construction noise and vibration management plan (developed in accordance with the associated outline plan (APP-196)). These measures would also be applied as appropriate to other facilities, such as Midgeland Riding School and any other equestrian recreational resource providers.

~~1.3.5.2~~ 1.3.5.4 In addition to engagement in the pre-application stage, the Applicants have had a number of meetings with Wrea Green since June 2024 and ~~prior to submission of~~ during the ~~DCO application~~ examination. These meetings have focussed on the Applicants providing further detail to Wrea Green regarding the Transmission Assets construction process and seeking to understand their concerns in order that opportunities for specific mitigation can be explored further.

~~1.3.5.3~~ 1.3.5.5 The Applicants understand that Wrea Green's principal concerns (as set out in ~~REP-03~~ REP3-134) relate to the impacts of the Transmission Assets on horses and rider safety as a result of construction activities and construction effects, such as noise and vibration, visual disturbance and odour, in close proximity to the equitation centre.

~~1.3.5.4~~ ~~The Applicants are confident that with the application of the mitigation set out within Section 1.2 of the outline Noise and Vibration Management Plan (APP-196), the potential construction impacts to the equitation school can be appropriately managed via the suite of noise attenuation techniques available (APP-196, which form part of the Outline CoCP (see CoT35, of Volume 1, Annex 5.3: Commitments Register) (AS-030).~~

~~1.3.5.5~~ 1.3.5.6 Noise control measures will be consistent with the recommendations of the current version of BS 5228 - Part 1: Noise and Part 2: Vibration. Statutory requirements and legislation will be fully complied with during the construction works. Measures noted that are relevant to the potential impacts on the Wrea Green Equitation Centre include:

- The use of plant fitted with measures which will reduce potential noise emissions, for example those with effective silencers, noise insulation, acoustic enclosures, or reduced sound models
- Activities will be designed to be undertaken with any directional noise emissions pointing away from noise-sensitive receptors, where practicable
- Use of local noise screening or site hoardings will be used to reduce noise, where necessary and practicable
- The appointment of a site contact to whom complaints/queries about construction activity can be directed - any complaints will be investigated, and action taken where appropriate;
- Where noise complaints are received, construction noise and vibration monitoring may be undertaken at the relevant receptors to ensure the threshold values are not exceeded and notify the principal contractor if exceedances occur;
- Site personnel will be informed about the need to minimise noise as well as about the health hazards of exposure to excessive noise. Their training will include advice relating to the proper use and maintenance of tools and equipment, the positioning of machinery on site to reduce noise emissions to neighbouring residents, as well as ensuring, that unnecessary noise is avoided when carrying out manual operations and operating plant and equipment;
- No audible music or radios will be played on the construction sites; and
- Information on communication will be provided in the Communications Plan, an outline of which is provided in the Outline Communications Plan (APP-194). This includes a commitment that all necessary parties (including local residents and businesses, such

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as Wrea Green Equitation Centre) will be informed when construction works will take place. Information provided will include information on the general location of the activities and the expected duration- in a clear and understandable way (including in alternative formats).

1.3.5.7 The Applicants ~~are undertaking~~have undertaken a specific equestrian noise study ~~that will be which has been~~ submitted into examination at Deadline 6 ~~and will provide~~(S D6 9). This study provides further information regarding the sensitivity of horses and users of the facilities to the activities proposed and ~~suitable mitigation measures.~~identifies appropriate measures that will be adopted to mitigate the effects on both the businesses and their users with protected characteristics.

1.3.5.8 The Applicants ~~will arrange to meet~~met with Wrea Green ~~and Fylde Borough Council~~Equitation Centre on Friday 17<sup>th</sup> October to discuss the findings of this report and ~~whether further updates are required to the~~principles of a bespoke communications protocol for the Centre, given the protected characteristics of some of its users. The findings of the report underpin the appropriateness of the measures included in the Outline Noise and Vibration Management Plan at Deadline 6 to reduce the effects of construction activities at source, or for the receptor, such as placing soil store and / or site cabins on the north-western boundary of the construction compound to act as a bund providing visual and noise screening.

1.3.5.9 In addition, as part of the strategy in the Outline Communications Plan updated at Deadline 6 (J1.1/F05), the Projects have committed to direct engagement with Wrea Green Equitation Centre via a bespoke Communications Plan which will be prepared in consultation with the Centre. The Wrea Green Communications Plan (together with the detailed Construction Noise and Vibration Management Plan, Construction Traffic Management Plan and Construction Method Statement) will include specific measures to mitigate potential impacts on the Wrea Green Equitation Centre and its users. These measures will include, but will not be limited to:

#### Information provision / gathering

- Provision by the Applicants of a list of potential activities, including schedules of deliveries and activities (via the detailed Construction Traffic Management Plan) to discuss the context of Wrea Green Equitation Centre's current operation and mitigations that can be applied (i.e. timing and location of classes and works).

#### Engagement.

- Regular check-in calls prior to and during any works in the vicinity (in addition to any general project updates);
- Prior information and details about the works taking place in the vicinity of Wrea Green Equitation Centre (including agreement on what constitutes in the vicinity);
- Proposed start dates and durations of works;
- The agricultural liaison officer's contact details; and

- The contractor's details and landowner liaison contact.

### Mitigations

- Bespoke mitigations to be employed, relating to the key areas of concern for Wrea Green Equitation Centre including, but not limited to:
  - Layout of the temporary construction compound to minimise potential odour and visual impacts;
  - Appropriate fencing and screening; and
  - Measures to minimise noise and vibration impacts associated with the setup, use and decommissioning of the temporary construction compound.
- Regular review (during check-in calls) of the efficacy of mitigation measures, including the protocols contained within the Wrea Green Communications Plan, to ensure measures can be amended as appropriate.

~~4.3.5.6~~ 1.3.5.10 In addition, the Project has committed to provision of an equine veterinarian or other suitable specialist to support Wrea Green Equitation Centre by advising on potential additional mitigation measures during the construction phase. This will take into account the activities carried out during the pre-construction period and ensure expert input is available to understand the horses' behaviour and advice on measures that, alongside the Applicants' mitigation, can be taken to help them to acclimatise to any changes in their environment.

~~4.3.5.7~~ 1.3.5.11 The final CoCP(s) are secured by Requirement 8 of Schedules 2A and 2B of the draft DCO (AS-004). As part of this detailed Construction Noise and Vibration Management Plan(s) will be implemented as approved by the relevant local planning authorities in consultation with the relevant stakeholders, as appropriate.

~~4.3.5.8~~ 1.3.5.12 The mitigation measures will be actively reviewed throughout the construction phase, where necessary, to ensure that they are effective.

The Applicants are confident that with the application of the mitigation set out within Section 1.2 of the Outline Noise and Vibration Management Plan (J1.3/F04), and commitments made within the Outline Communications Plan (J1.1/F05) in relation to the details to be included within the detailed Onshore Construction Method Statement post-consent, that the potential construction effects to those with protected characteristics at care homes, schools and the riding schools (and in particular Wrea Green Equitation Centre and its users with protected characteristics) will be appropriately managed via the suite of mitigation techniques available, which form part of the Outline CoCP (see CoT35, of Volume 1, Annex 5.3: Commitments Register) (J1/F05) and the Outline Construction Traffic Management Plan (J5/F06).

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## 1.3.6 Application of PSED through Examination procedure

- 1.3.6.1 Throughout Examination, the Planning Inspectorate and ExA will be required to take steps to facilitate engagement by those with protected characteristics, for example confirming if any reasonable adjustments are required in hearings. The Examination must be conducted in a manner that facilitates engagement.

## 1.4 Conclusion

- 1.4.1.1 The Environmental Statement and outline management plans have considered the impact that the project would have on vulnerable groups and whether the mitigation measures proposed are sufficient to prevent any significant effects from arising. Through having regard to the information within the Application documents and the further information provided during Examination [in relation to those with protected characteristics](#) and summarised within this Statement, the ExA and SoS can be satisfied that they have complied with their PSED duties and met the necessary procedural requirements. The ExA and SoS can also conclude that no further mitigation measures would be necessary.