MORGAN AND MORECAMBE OFFSHORE WIND FARMS: TRANSMISSION ASSETS

Planning Statement

National Planning Policy Framework Tracker

Deadline 7

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1 National Planning Policy Framework tracker (updated for Deadline 7 to reflect the NPPF 2024)

Table 1.1: National Planning Policy Framework tracker

Section/topic	Policy	Policy requirement	Accordance with the policy
Introduction to the National Planning Policy Framework (NPPF)	Paragraph (Para) 5	The Framework does not contain specific policies for nationally significant infrastructure projects. These are determined in accordance with the decision-making framework in the Planning Act 2008 (as amended) and relevant national policy statements for major infrastructure, as well as any other matters that are relevant (which may include the National Planning Policy Framework). National policy statements form part of the overall framework of national planning policy, and may be a material consideration in preparing plans and making decisions on planning applications.	In accordance with this, the relevant primary policy for a development for which development consent is sort, are the National Policy Statements. Transmission Assets has received a direction under s35 of the PA2008 therefore this application has been prepared on the basis that NPS EN-1, and NPS EN-3 and EN-5 as other relevant NPS,are the primary policy for Secretary of State decision making, as established by paragraphs 1.1.2 and 1.3.10 of EN-1. The NPPF falls within the category of other matters that the SoS considers to be relevant under s104(2)(d) of the Planning Act 2008. Paragraph 5 has however been considered and addressed in the Planning Statement Section 3 (document reference J28). Each ES topic chapter also assesses the proposal against relevant NPPF paragraphs.
Achieving Sustainable Development	Para 8	Achieving sustainable development means that the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives): a) an economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;	The Transmission Assets meets the economic objective at both the national and local levels. The Morgan and Morecambe Generation Assets will provide almost 2GW of new offshore wind capacity, thereby making a meaningful contribution to the ambition of the British Energy Security Strategy. The Transmission Assets will contribute the transfer of this 2GW renewable energy, helping to build the strong, responsive and competitive economy.

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		b) a social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and c) an environmental objective – to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.	At the local level, the Applicants have committed to providing an Employment and Skills Plan through the inclusion of requirement 19 in Schedules 2A and 2B of the draft DCO [REP 5a-018]. The outline Employment and Skills Plan (document reference J31 F02) provides the Applicants' approach to supporting employment and skills development in the offshore wind sector. The detailed Employment and Skills Plans will be developed through consultation with relevant stakeholders who will support local communities to gain access to skills training and employment opportunities (either directly through the Transmission Assets or in the wider supply chain, where relevant). Criterion b is not directly applicable to the Transmission Assets as it primarily relates to provision of homes, however in providing low carbon energy infrastructure it aids in supporting communities. The Applicants have prepared the outline Design Principles (oDP) (document J3) to demonstrate compliance with best practice and policy guidance on good design. The principles of the oDP seek to guide the design process towards design outcomes that ensure that the substation sites would fit sensitively into the local context; mitigate (as far as possible) adverse environmental effects and respects local communities. The Statement of Reasons (document reference D2) and the Planning Statement (document reference J28) set out why there is a compelling case in the public interest to deliver the Transmission Assets, which are identified in National Policy Statement EN-1 as 'critical national priority' infrastructure." With regards to criterion c), as set out in Volume 1, Chapter 5: Environmental assessment methodology (document reference F1.5), mitigation measures are measures developed to avoid, prevent, reduce or, if possible, offset significant adverse environmental effects.

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			In some cases, measures are proposed that would create or enhance beneficial environmental or social effects; these are referred to as enhancement measures. In addition to the topic chapters and annexes, a full list of all measures proposed to avoid, prevent, reduce or, if possible, offset the identified significant adverse effects is provided in Volume 1, Annex 5.3: Commitments Register (document reference F1.5.3).
Pre-application engagement and front-loading	Para 40	Early engagement has significant potential to improve the efficiency and effectiveness of the planning application system for all parties. Good quality pre- application discussion enables better coordination between public and private resources and improved outcomes for the community.	Early engagement has taken place before and at the statutory pre-application stage with all relevant (statutory and non-statutory) stakeholders and members of the public who have an interest in the project. Full details of all statutory and non-statutory consultation undertaken for the Transmission Assets are outlined in the Consultation Report (document reference E3). Where necessary that engagement has continued during the Transmission Assets' examination to ensure that the position of the relevant statutory consultees is presented to the ExA and the SoS at the close of examination.
	Para 44	The right information is crucial to good decision-making, particularly where formal assessments are required (such as Environmental Impact Assessment, Habitats Regulations assessment and flood risk assessment). To avoid delay, applicants should discuss what information is needed with the local planning authority and expert bodies as early as possible.	The Transmission Assets have been subject to an Environmental Impact Assessment (EIA), the initial outcomes of which were presented in the Preliminary Environmental Information Report (PEIR) as part of the statutory consultation and the final outcomes of which have been reported in the ES that also accompanies the application (document references F1, F2, F3 and F4). In addition, the Transmission Assets have been subject to Habitats Regulations Assessment (HRA) in order to determine the potential effects on Natural 2000 or European designated sites and species, the outcomes of which have been reported in the Information to Support Appropriate Assessment (ISAA) report, HRA Screening

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			report and accompanying annexes (document references E2 and E3). Consultation and engagement with relevant local planning authorities and expert bodies has been undertaken to identify the level of detail and main issues in order to minimise delays. Evidence of this process is contained with the Consultation Report (document reference E1). Where necessary that engagement has continued during the Transmission Assets' examination to ensure that the position of the relevant statutory consultees is presented to the ExA and the SoS at the close of examination.
Determining applications	Para 48	Planning law requires that applications for planning permission be determined in accordance with the development plan, unless material considerations indicate otherwise.	The NPPF does not contain specific policies for nationally significant infrastructure projects as these are determined under the Planning Act 2008 (as amended) and relevant national policy statements for major infrastructure (paragraph 5). The relevant primary policy for a development for which development consent is sought, are the National Policy Statements. Transmission Assets has received a direction under S35 of the PA2008 therefore this application has been prepared on the basis that NPS EN-1, and NPS EN-3 and EN-5 as other relevant policies, are the primary policy for Secretary of State decision making, as established by paragraphs 1.1.2 and 1.3.10 of EN-1. The NPPF falls within the category of other matters that the SoS considers to be relevant under s104(2)(d) of the Planning Act 2008. A local policies tracker (document reference J28.3) has also been provided to demonstrate compliance with relevant development plans.
Building a strong, competitive economy	Para 85	Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support	Volume 4, Chapter 2 Socio-economics of the ES and Volume 4, Annex 2.1: Socio-economics technical report (document reference F4.2 and F4.2.1) provide detail and

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		economic growth and productivity, taking into account both local business needs and wider opportunities for development. The approach taken should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future. This is particularly important where Britain can be a global leader in driving innovation, and in areas with high levels of productivity, which should be able to capitalise on their performance and potential.	assessment on the impact of Transmission Assets in socio-economic terms. In relation to job creation, Transmission Assts is assessed as having a moderate beneficial effect for the onshore study area, including in regard to employment, during construction, operation and maintenance. The Applicants have committed to providing an Employment and Skills Plan through the inclusion of requirement 19 in Schedules 2A and 2B of the draft DCO [REP 5a-018. The outline Employment and Skills Plan (document reference J31 F02) provides the Applicants' approach to supporting employment and skills development in the offshore wind sector. The detailed Employment and Skills Plans will be developed through consultation with relevant stakeholders who will support local communities to gain access to skills training and employment opportunities (either directly through the Transmission Assets or in the wider supply chain, where relevant). The Employment and Skills Plans will cover both onshore and offshore elements of the associated Generation projects.
Promoting healthy and safe communities	Para 98	To provide the social, recreational and cultural facilities and services the community needs, planning policies and decisions should: a) plan positively for the provision and use of shared spaces, community facilities (such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship) and other local services to enhance the sustainability of communities and residential environments; b) take into account and support the delivery of local strategies to improve health, social and cultural well-being for all sections of the community;	Paragraphs 97, 103 and 104 have been considered in the Planning Statement Section 5.16 (document reference J28) as well as within Volume 3, Chapter 6: Land use and recreation of the ES (document reference F3.6) under Section 6.6 and 6.11 Table 6.14 of Volume 3, Chapter 6: Land use and recreation (APP-104) outlines that the Blackpool Road Recreation Ground is an area of designated open space associated with Blackpool Road Playing Field and Recreation Ground. Volume, Chapter 3: Project description (document reference AS-024), Section 3.15.4 provides detail of the proposed works at Blackpool Road Recreation Ground.

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		c) guard against the unnecessary loss of valued facilities and services, particularly where this would reduce the community's ability to meet its day-to-day needs; d) ensure that established shops, facilities and services are able to develop and modernise, and are retained for the benefit of the community; and e) ensure an integrated approach to considering the location of housing, economic uses and community facilities and services.	To minimise the potential impact to the users of Blackpool Road Recreation Ground the width of the onshore export cable corridor has been reduced. Additionally, the Transmission Assets have also committed to the trenchless technique installation of the onshore export cables through Blackpool Road Recreation Ground, ensuring that the surface of the grounds will largely remain undisturbed during construction. The total active construction duration will last for a maximum of 5 months within the overall construction duration for the onshore export cable corridor. The time, duration and the extent of the construction period and how this effects the Blackpool Road Recreation Ground have been fully considered within the Environmental Statement chapters particularly, • Volume 1, Annex 5.1: Human health (APP-035), section 1.7.3: health and wellbeing effect from changes in open space and recreation; • Volume 3, Chapter 6: Land use and recreation (APP-014), section 6.11.4: the temporary impact to the use of recreational resources; and • Volume 3, Chapter 10: Landscape and visual resources (APP-123), section 10.12.6 visual impacts – landfall and onshore export cables, specifically, users of open space (paragraphs 10.12.6.27 – 10.12.6.30, Concluding that there will be no long term effect on the public use of the Recreation Ground. An Outline Open Space Management Plan has been appended to the Outline PRoW Management Plan (REP6-087), which includes measures to minimise potential impacts to the users of the Blackpool Road Recreation Ground.
Open space and recreation	Paragraph 104	Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless: a) an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or b) the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or c) the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use.	
Open space and recreation	Para 105	Planning policies and decisions should protect and enhance public rights of way and access, including taking opportunities to provide better facilities for users, for example by adding links to existing rights of way networks including National Trails.	

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			Further information can be found in the Blackpool Road Recreation Ground – Summary of impacts (document reference S_D1_5.5) PRoW, National Trails, coastal access and other rights of access to land within or near the Onshore Order Limits are identified in section 6.6 and assessed in section 6.11 of Volume 3, Chapter 6: Land Use and Recreation of the ES (document reference F3.6). Measures adopted as part of the Transmission Assets to mitigate impacts on land use and recreation are provided in section 6.8 of the chapter. This includes the preparation of a PRoW Management Plan in general accordance with the Outline Public Rights of Way Management Plan (document reference J1.5), which has been submitted with the application for development consent and is secured by a requirement of the DCO. The measures to be implemented as part of the PRoW Management Plan seek to minimise impacts on public footpaths, bridleways and other promoted routes (e.g., NCRs, Long Distance Footpaths) during construction of the Transmission Assets. The aim of the Outline PRoW Management Plan is to seek to maintain access within the existing PRoW for the public during construction and operation of the Transmission Assets. However, where this has not been possible, proposed indicative temporary diversions or permanent gated crossings (i.e. for the Morecambe onshore substation) have been identified as part of the Outline PRoW Management Plan.
Promoting sustainable transport	Para 109	Transport issues should be considered from the earliest stages of plan-making and development proposals, using a vision-led approach to identify transport solutions that deliver well-designed, sustainable and popular places. This should involve:	Section 7.11 of Volume 3 Chapter 7: Traffic and transport of the ES (document reference F3.7) assesses the impact of construction vehicle movements arising from the onshore elements of the Transmission Assets on the

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		a) making transport considerations an important part of early engagement with local communities; b) ensuring patterns of movement, streets, parking and other transport consideration are integral to the design of schemes, and contribute to making high quality places; c) understanding and addressing the potential impacts of development on transport networks; d) realising opportunities from existing or proposed transport infrastructure, and changing transport technology and usage – for example in relation to the scale, location or density of development that can be accommodated; e) identifying and pursing opportunities to promote walking, cycling and public transport use; and f) identifying, assessment and taking into account the environmental impacts of traffic and transport infrastructure– including appropriate opportunities for avoiding and mitigating any adverse effects, and for net environmental gains.	local road network (LRN) and strategic road network (SRN). Section 7.13 of Volume 3, Chapter 7: Traffic and transport of the ES (document reference F3.7), assesses the cumulative impact of traffic and transport on the LRN and SRN. Existing sustainable transport infrastructure is considered within section 7.6 of Volume 3 Chapter 7: Traffic and transport of the ES (document reference F3.7) and at Volume 3, Figures 7.2 to 7.3 of the ES and includes an analysis of public transport services and pedestrian and cycle infrastructure. High-level details regarding site accesses and highways were provided at Statutory Consultation in the Traffic and Transport PEIR chapter, with a question included on the feedback form highlighting whether there were any particular concerns, ensuring transport considerations were part of early community engagement. See the Consultation Report (document reference E1). The Applicants have consulted with and had due regard to matters raised by LCC (as LHA) as part of the pre-application process. Since submission of the DCO application the Applicants have met with LCC on approximately 10 occasions to ensure that the requirements of the NPPF were met. Full details of agreements can be found in the LCC statement of Common Ground (document reference S_D1_61). With the application of mitigation measures outline within the outline Construction Traffic Management Plan (J5/F06) and outline Highways Access Management Plan (J8/F05), no significant adverse effects on traffic and transport are predicted to arise from the development of the Transmission Assets alone or cumulatively with other projects.

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Considering development proposals	Para 115	In assessing sites that may be allocated for development in plans, or specific applications for development, it should be ensured that: d) any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree through a vision-led approach.	Existing sustainable transport infrastructure is considered within section 7.6 of Volume 3, Chapter 7: Traffic and transport of the ES and at Volume 3, Figures 7.2 to 7.3 of the ES (document reference F3.7) and includes an analysis of public transport services and pedestrian and cycle infrastructure. Travel plan measures, details on staff parking and other relevant transport elements are included within the Outline Construction Traffic Management Plan (OCTMP) (document reference J5) to be secured as part of the CoCP requirement within the draft DCO. Section 7.11 of Volume 3, Chapter 7 of the ES (document reference F3.7) assesses access routes and the impact of construction vehicle movements arising from the onshore elements of the Transmission Assets on the LRN and SRN. Proposed permanent access points are set out within the Outline Highways Access Management Plan (document reference J8).
	Para 116	Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network, following mitigation, would be severe taking into account all reasonable future scenarios.	Section 7.11 of Volume 3, Chapter 7: Traffic and transport of the ES (document reference F3.7) assesses the impact of construction vehicle movements arising from the onshore elements of the Transmission Assets on the LRN and SRN. Section 7.13 of the ES chapter assesses the cumulative impact of traffic and transport on the LRN and SRN. The conclusion of the assessment of likely significant effects, with the application of mitigation measures outline within OCTMP (J5/) and outline Highways Access Management Plan (J8) is that no significant adverse effects on traffic and transport are predicted to arise from the development of the Transmission Assets alone or cumulatively with other projects.

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	Para 117	Within this context, applications for development should: a) give priority first to pedestrian and cycle movements, both within the scheme and with neighbouring areas; and second – so far as possible – to facilitating access to high quality public transport, with layouts that maximise the catchment area for bus or other public transport services, and appropriate facilities that encourage public transport use; b) address the needs of people with disabilities and reduced mobility in relation to all modes of transport; c) create places that are safe, secure and attractive – which minimise the scope for conflicts between pedestrians, cyclists and vehicles, avoid unnecessary street clutter, and respond to local character and design standards; d) allow for the efficient delivery of goods, and access by service and emergency vehicles; and e) be designed to enable charging of plug-in and other ultra-low emission vehicles in safe, accessible and convenient locations.	Volume 3, Chapter 7: Traffic and transport (document reference F3.7) addresses this point and it concludes that traffic management measures for construction vehicles are set out in the OCTMP (document reference J5) to be secured as part of the CoCP requirement within the draft DCO. Proposed accesses with relevant traffic management measures to allow for efficient deliveries and access are set out within the OHAMP (document reference J8). Both the OCTMP and OHAMP are to be secured as part of the CoCP requirement within the draft DCO and therefore the Transmission Assets provides with measures to minimise conflict between pedestrians, cyclists and vehicles and respond to local design standards which complies with this paragraph of the NPPF.
	Para 118	All developments that will generate significant amounts of movement should be required to provide a travel plan, and the application should be supported by a vision-led transport statement or transport assessment so that the likely impacts of the proposal can be assessed and monitored.	Volume 3 Chapter 7: Traffic and transport of the ES (document reference F3.7) contains an integrated TA throughout to consider the potential impacts and effects on the operation of the highway network arising from the onshore elements of the Transmission Assets. Travel plan measures are included within a OCTMP (document reference J5) to be secured as part of the CoCP requirement in the DCO. With the application of mitigation measures outlined within the OCTMP and outline Highways Access Management Plan (document reference J8) no significant adverse effects on traffic and transport are predicted to arise from the development of the Transmission Assets alone or cumulatively with other projects.

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Achieving well-designed and beautiful places	Para 135	Planning policies and decisions should ensure that developments: a) will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development; b) are visually attractive as a result of good architecture, layout and appropriate and effective landscaping; c)are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities); d) establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit; e) optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and f) create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.	EN-1 requires good design to be embedded within a project, whilst acknowledging that the nature of energy infrastructure development will often limit the extent to which it can contribute to the enhancement of the quality of the area (paragraph 4.7.2). The Applicants have prepared the outline Design Principles (oDP) (document reference J3) to demonstrate compliance with best practice and policy guidance on good design. The oDP forms part of the certified suite of documents supporting the DCO application and provides a central, clear, and enforceable framework for post-consent detailed design with the discharging planning authority. The principles of the oDP seek to guide the design process towards design outcomes that ensure that the substation sites would fit sensitively into the local context; mitigate (as far as possible) adverse environmental effects and respects local communities. The Applicants' design approach has been informed by the National Infrastructure Commission's Design Principles for National Infrastructure (2020), updated during Examination to reflect the Project-Level Design Principles (May 2024), alongside lessons learned from recently consented DCO precedent projects. This structured approach ensures that the Transmission Assets respond directly to the key elements of good design set out in NPS EN-1.
	Para 136	Trees make an important contribution to the character and quality of urban environments, and can also help mitigate and adapt to climate change. Planning policies and decisions should ensure that new streets are tree-lined, that opportunities are taken to incorporate trees elsewhere in developments (such as parks and community orchards), that appropriate measures are in place to secure the long-term maintenance of newly-planted trees, and that existing trees are retained wherever	The Transmission Assets incorporates landscaping proposals which include the provision of new trees where necessary and site selection and discussions with relevant stakeholders seek to protect the most valuable trees within the Order Limits. An Outline Arboriculture Method Statement (AMS) has been prepared (document reference S_D5_10) setting

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		possible. Applicants and local planning authorities should work with highways officers and tree officers to ensure that the right trees are planted in the right places, and solutions are found that are compatible with highways standards and the needs of different users	sets out the key management measures that will be implemented in relation to trees during the construction phase of the Transmission Assets. The detailed AMS(s) will be in accordance with the principles established in the Outline AMS and will be agreed with the relevant authority prior to Morgan and Morecambe Offshore Wind Farms: Transmission Assets Document Reference: S_D5_10 Page 3 commencing construction of the relevant stage of the onshore and intertidal works. All retained trees and Root Protection Areas (RPAs) will be satisfactorily protected during construction. This will be secured via the CoCP (document reference J1)
	Para 137	Design quality should be considered throughout the evolution and assessment of individual proposals. Early discussion between applicants, the local planning authority and local community about the design and style of emerging schemes is important for clarifying expectations and reconciling local and commercial interests. Applicants should, where applicable, provide sufficient information to demonstrate how their proposals will meet the design expectations set out in local and national policy, and should work closely with those affected by their proposals to evolve designs that take account of the views of the community. Applications that can demonstrate early, proactive and effective engagement with the community should be looked on more favourably than those that cannot.	The Applicants have prepared the outline Design Principles (oDP) (document J3) to demonstrate compliance with best practice and policy guidance on good design. The oDP forms part of the certified suite of documents supporting the DCO application and provides a central, clear, and enforceable framework for post-consent detailed design with the discharging planning authority. The principles of the oDP seek to guide the design process towards design outcomes that ensure that the substation sites would fit sensitively into the local context; mitigate (as far as possible) adverse environmental effects and respects local communities. Consultation between the Applicants and relevant local planning authorities and local communities regarding the design of the Transmission Assets has taken place at several stages prior to submission of the DCO application. Where necessary that engagement has continued during the Transmission Assets' examination. Consultation undertaken to date relevant to the assessment of landscape and visual resources is presented in section 10.3 of Volume 3 Chapter 10:
	Para 139	Development that is not well designed should be refused, especially where it fails to reflect local design policies and government guidance on design, taking into account any local design guidance and supplementary planning documents such as design guides and codes. Conversely, significant weight should be given to: a) development which reflects local design policies and government guidance on design, taking into account any local design guidance and supplementary planning documents such as design guides and codes; and/or b)	

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		outstanding or innovative designs which promote high levels of sustainability, or help raise the standard of design more generally in an area, so long as they fit in with the overall form and layout of their surroundings.	Landscape and visual resources of the ES (document reference F3.10).
Protecting Green Belt land/ Proposals affecting the Green Belt	Para 142	The Government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.	Consideration of the Transmission Assets regarding Green Belt is presented in Section 5.25 of the Planning Statement (document reference J28) and a case for very special circumstances is put forward which concludes that these very special circumstances exist and that the benefits of the Transmission Assets outweigh the harm to the Green Belt and any other harm. The Green Belt Technical Note (document reference D_D3_12) addresses which elements of the Transmission Assets comprise 'engineering operations' for the purposes of paragraph 154 of the NPPF 2025 (and 5.11.2 of EN-1) and the extent to which the Transmission Assets will impact the Green Belt in Section 1.6.4. Further consideration to the Green Belt in relation to Transmission Assets has also been provided within the technical note against the NPPF 2024 which concludes that: • There are no reasonable means by which the Green Belt could have been avoided particularly having regard to the siting of the two proposed substations and all reasonably practicable effort has been made to avoid, minimise and mitigate impacts in accordance with mitigation hierarchy. • The resulting harm on fundamental aim and relevant purposes of Green Belt will be limited and general performance of Green Belt would remain effective, by
	Para 143	Green Belt serves five purposes: a. to check the unrestricted sprawl of large built-up areas; b. to prevent neighbouring towns merging into one another; c. to assist in safeguarding the countryside from encroachment; d. to preserve the setting and special character of historic towns; and e. to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.	
	Para 153	When considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt including harm to its openness. Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances. 'Very special circumstances' will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations.	
	Para 154	Development in the Green Belt is inappropriate unless one of the following exception applies:	

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		a) buildings for agriculture and forestry; b) the provision of appropriate facilities (in connection with the existing use of land or a change of use), including buildings, for outdoor sport, outdoor recreation, cemeteries and burial grounds and allotments; as long as the facilities preserve the openness of the Green Belt and do not conflict with the purposes of including land within it; c) the extension or alteration of a building provided that it does not result in disproportionate additions over and above the size of the original building; d) the replacement of a building, provided the new building is in the same use and not materially larger than the one it replaces; e) limited infilling in villages; f) limited affordable housing for local community needs under policies set out in the development plan (including policies for rural exception sites); and g) limited infilling or the partial or complete redevelopment of previously developed land (including a material change of use to residential or mixed use including residential), whether redundant or in continuing use (excluding temporary buildings), which would not cause substantial harm to the openness of the Green Belt. h) Other forms of development provided they preserve its openness and do not conflict with the purposes of including land within it. These are: - mineral extraction - engineering operations - local transport infrastructure which can demonstrate a requirement for a Green Belt location; - the re-use of buildings provided that the buildings are of permanent and substantial construction;	virtue of the Green Belt being sufficiently robust; that 'any other harm' is limited based on judgements relating to visual impact (including reference to visual openness) and landscape character change. Harm caused during construction would be temporary and will result in no permanent harm to the Green Belt. It is not considered that harms caused by temporary works should carry much, if any, weight, given Green Belt policy is directed towards consideration of development that is permanent. • The Applicants consider that there are robust very special circumstances (VSC) which clearly outweigh the identified limited short and longer terms harms arising from the proposals by reason of inappropriate development. • Regardless of the VSC case, the Transmission Assets are correctly considered to comprise a Critical National Infrastructure Project – and having demonstrated that that tests for Green Belt are met and mitigation hierarchy has been applied, on this basis, Green Belt should not be considered a constraint to the proper consideration of the merits of the proposals. • The objectives of relevant Local Plan policies are met, where reasonably practicable. The Transmission Assets are considered to constitute CNP infrastructure. As such, the starting point for decision making is that CNP infrastructure is to be treated as if it has met any tests which are set out within the NPSs, or any other planning policy, which requires a clear outweighing of harm, exceptionality, or very special circumstances where the mitigation hierarchy has been applied. Sections 1.3, 1.4 and 1.5 of the Green Belt

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		-material changes in the use of land (such as changes of use for outdoor sport or recreation, or for cemeteries and burial grounds); and - development, including buildings, brought forward under a Community Right to Build Order or Neighbourhood Development Order	Technical Note (REP4-092), demonstrate how the Applicants have applied the mitigation hierarchy to avoid, minimise and mitigate impacts and harm to the Green Belt as far as practicable. Consequently, the starting point for determination should be that the test for very special circumstances is presumed to have been met, meeting the requirements of paragraph 160. The Applicants consider that there is a compelling case that the harm to the Green Belt would be clearly outweighed by the very special circumstances (VSC) required to justify the proposed development and as Critical National Priority infrastructure further weight is added. Therefore, regardless of the CNP status of the Transmission Assets, and the appropriate application of the Mitigation Hierarchy, robust very special circumstances have been demonstrated delivering the new renewable energy generation from two offshore wind NSIPs and which clearly outweigh any harms to be caused to the Green Belt.
	Para 155	The development of homes, commercial and other development in the Green Belt should also not be regarded as inappropriate where all the following apply; a) The development would utilise grey belt land and would not fundamentally undermine the purposes (taken together) of the remaining Green Belt across the area of the plan; b) There is a demonstrable unmet need for the type of development proposed; c) The development would be in a sustainable location, with particular reference to paragraphs 110 and 115 of this Framework; and d) Where applicable the development proposed meets the 'Golden Rules' requirements set out in paragraphs 156-157 below.	
	Para 160	When located in the Green Belt, elements of many renewable energy projects will comprise inappropriate development. In such cases developers will need to demonstrate very special circumstances if projects are to proceed. Such very special circumstances may include the wider environmental benefits associated with increased production of energy from renewable sources.	
Meeting the challenge of climate change,	Para 161	The planning system should support the transition to net zero by 2050 and take full account of all climate impacts including overheating, water scarcity, storm and flood risks and coastal change. It should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise	The Transmission Assets are required to connect the Generation Assets (the Morgan Offshore Wind Project and the Morecambe Offshore Windfarm) to the UK electricity transmission network, contributing promptly to:

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flooding and coastal change		vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure.	• the UK Government's ambition to deliver 50 GW of offshore wind by 2030; • delivering much needed investment and securing construction and operations jobs in the UK; • securing our energy supply; and • the UK's response to the climate change crisis. The Generation Assets, together with the Transmission Assets, therefore have an important part to play in securing the timely delivery of the Government's renewable energy strategy and achieving legally binding greenhouse gas emissions reduction targets. The national and international policy commitments described in section 3 of the Planning Statement (document reference J28) demonstrate the need for renewable energy and, specifically, for offshore wind and electricity network improvements, in order to meet climate commitments and contribute to addressing the climate crisis. The impacts on coastal processes (including policies set out in NPS EN-1 in relation to coastal change) are considered in section 5.2 (physical processes) of the Planning Statement. Impacts relating to climate change are considered in section 5.22 (climate change) of the Planning Statement (document reference J28) and more thoroughly within Volume 4, Chapter 1: Climate Change of the ES (document reference F4.1). A GHG assessment and reduction strategy is also provided with the application (document reference F4.1.1.) Impacts on onshore hydrology and flood risk are assessed in Volume 3, Chapter 2: Hydrology and flood risk of the ES (document reference F3.2).

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Planning for climate change	Para 164	New development should be planned for in ways that: a) avoid increased vulnerability to the range of impacts arising from climate change. When new development is brought forward in areas which are vulnerable, care should be taken to ensure that risks can be managed through suitable adaptation measures, including through incorporating green infrastructure and sustainable drainage systems; and b) help to reduce greenhouse gas emissions, such as through its location, orientation and design. Any local requirements for the sustainability of buildings should reflect the Government's policy for national technical standards.	Volume 4, Chapter 1: Climate change of the ES (document reference F4.1) considers the GHG emissions arising from the construction, operation and maintenance and decommission stages of the Transmission Assets at section 1.11.2, as well as the overall net whole life emissions, included in section 1.11.5 of Volume 4, Chapter 1: Climate change of the ES (document reference F4.1). A GHG reduction strategy has also been produced for Transmission Assets (document reference J4). The design of the Transmission Assets has incorporated nature-based solutions, where practicable, such as in the development of biodiversity enhancement measures and in the outline design of the onshore substations, which has taken into account hydrology, flood risk, landscape and biodiversity considerations. The purpose of the Transmission Assets is to provide a connection to the UK Grid for two offshore wind farms which will provide almost 2GW of new renewable energy generation capacity. The cumulative climate change effects of the Transmission Assets with the Generation Assets are set out in section 1.13 of Volume 4, Chapter 1: Climate change of the ES (document reference F4.1). This demonstrates that some construction phase emissions are unavoidable. However, the overall effect of the Transmission Assets and Generation Assets together would be beneficial and significant in EIA terms, as a result of a net reduction in GHG emissions arising from the offshore wind farms, resulting from the displacement of higher emitting electricity generation sources.
	Para 165	To help increase the use and supply of renewable and low carbon energy and heat, plans should:	The relevant primary policy for a development for which development consent is sought, are the National Policy Statements, which provide the positive strategy for

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Planning and flood risk		a) provide a positive strategy for energy from these sources, that maximises the potential for suitable development, and their future re-powering and life extension, while ensuring that adverse impacts are addressed appropriately (including cumulative landscape and visual impacts); b) consider identifying suitable areas for renewable and low carbon energy sources, and supporting infrastructure, where this would help secure their development; and c) identify opportunities for development to draw its energy supply from decentralised, renewable or low carbon energy supply systems and for co- locating potential heat customers and suppliers.	energy and the context for considering the impacts of the scheme. The Transmission Assets are needed to deliver new clean renewable energy generation from the Morgan and Morecambe offshore wind farms. In accordance with paragraphs 3.2.6 – 3.2.8 of EN-1 the urgent need for the project is something to which the Secretary of State should give substantial weight in his decision. As set out in Volume 1, Chapter 5: Environmental assessment methodology (document reference F1.5), mitigation measures are measures developed to avoid, prevent, reduce or, if possible, offset significant adverse environmental effects. In some cases, measures are proposed that would create or enhance beneficial environmental or social effects; these are referred to as enhancement measures. In addition to the topic chapters and annexes, a full list of all measures proposed to avoid, prevent, reduce or, if possible, offset the identified significant adverse effects is provided in Volume 1, Annex 5.3: Commitments Register (document reference F1.5.3).
	Para 166	In determining planning applications, local planning authorities should expect new development to: (a) comply with any development plan policies on local requirements for decentralised energy supply unless it can be demonstrated by the applicant, having regard to the type of development involved and its design, that this is not feasible or viable; and (b) take account of landform, layout, building orientation, massing and landscaping to minimise energy consumption.	Criterion a is not directly applicable to the Transmission Assets as the NPS provide the primary policy framework under which the development is considered. Compliance is however demonstrated in the following ES chapters: • Volume 1, Chapter 3: Project description (document reference F1.3); • Volume 1, Chapter 4: Site selection and consideration of alternatives (document reference F1.4); and • Volume 3, Chapter 10: Landscape and visual impacts (document reference F3.10) The Applicants have prepared the outline Design Principles (oDP) (document J3) to demonstrate compliance with best practice and policy guidance on

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			good design. This provides a central, clear, and enforceable framework for post-consent detailed design with the discharging planning authority. The principles of the oDP seek to guide the design process towards design outcomes that ensure that the substation sites would fit sensitively into the local context; mitigate (as far as possible) adverse environmental effects and respect local communities. The Applicant has also been engaging with the local planning authorities in relation to good design and the oDP.
	Para 168	When determining planning applications for all forms of renewable and low carbon energy developments and their associated infrastructure, local planning authorities should: a) not require applicants to demonstrate the overall need for renewable or low carbon energy, and give significant weight to the benefits associated with renewable and low carbon energy generation and the proposal's contribution to a net zero future; b) recognise that small-scale and community-led projects provide a valuable contribution to cutting greenhouse gas emissions; c) in the case of applications for the repowering and life-extension of existing renewable sites, give significant weight to the benefits of utilising an established site.	As established in section 4 of the Planning Statement (document reference J28), the Transmission Assets are considered to fall within the definition of CNP low carbon infrastructure, as set out in paragraph 4.2.4 of NPS EN-1. Paragraph 4.2.5 of NPS EN-1 confirms that energy transmission projects directed to be considered under the Planning Act 2008 under a section 35 direction (as is the case for the Transmission Assets) constitute CNP infrastructure. By definition, CNP infrastructure would make a significant contribution to meeting a national need, in accordance with policy set out in Part 3 of NPS EN-1 and sections 1.6 and 2.7 of NPS EN-5. In addition, and as stated in the section 35 direction (document reference J24), the Transmission Assets would also allow for the deployment of the Generation Assets, connecting two nationally significant offshore wind farms to the UK electricity transmission network, which would result in significant beneficial effects in terms of the UK's commitments to achieve net zero by 2050. Part 3 of NPS EN-1 outlines the urgent need for all types of energy infrastructure in order to achieve energy security and dramatically reduce GHG emissions (paragraphs 3.1.1 and 3.3.63).

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			When determining applications for energy transmission infrastructure, this should be done on the basis that the Government has demonstrated that there is a need for this type of infrastructure and, subsequently, substantial weight should be given to the contribution these projects would make towards satisfying this need. In alignment with paragraph 168 of the NNPF, paragraph 3.3.63 of NPS EN-1 reaffirms the Government's approach to addressing the urgent need for such projects, like Transmission Assets, and goes further by stating that: 'Subject to any legal requirements, the urgent need for CNP Infrastructure to achieving our energy objectives, together with the national security, economic, commercial, and net zero benefits, will in general outweigh any other residual impacts not capable of being addressed by application of the mitigation hierarchy. Government strongly supports the delivery of CNP Infrastructure and it should be progressed as quickly as possible.'
	Para 170	Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future). Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere.	An assessment of climate change is incorporated within Volume 3, Annex 2.3: Flood Risk Assessment of the ES (document reference F3.2.3). This has been undertaken in line with NPPF and PPG guidelines (refer to the Outline Operational Drainage Management Plan: document reference J10). The site selection process is detailed within Volume 1, Chapter 4: Site selection and consideration of alternatives of the ES. Development has been steered towards areas of lowest flood risk, including Flood Zone 1, with onshore substation development platforms assessed to have a low risk of flooding. The
	Para 181	When determining any planning applications, local planning authorities should ensure that flood risk is not increased elsewhere. Where appropriate, applications should be supported by a site-specific flood-risk assessment. Development should only be allowed in areas at risk of flooding where, in the light of this assessment (and the sequential and exception tests, as applicable) it can be demonstrated that:	

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		a) within the site, the most vulnerable development is located in areas of lowest flood risk, unless there are overriding reasons to prefer a different location; b) the development is appropriately flood resistant and resilient such that, in the event of a flood, it could be quickly brought back into use without significant refurbishment; c) it incorporates sustainable drainage systems, unless there is clear evidence that this would be inappropriate; d) any residual risk can be safely managed; and e) safe access and escape routes are included where appropriate, as part of an agreed emergency plan.	Transmission Assets are partially located within Flood Zone 3 and have been subjected to and deemed to have passed the sequential test as presented within section 1.9.2 of Volume 3, Annex 2.3: Flood risk assessment of the ES A conceptual drainage strategy for each onshore substation has been undertaken in line with local policy and includes SuDS. In addition, the onshore Water Framework Directive surface water and groundwater assessment provided in Volume 3, Annex 2.1 of the ES (document reference F3.2.1) has considered the Transmission Assets in the context of the environmental objectives of Water Framework Directive surface water bodies. This has considered the potential impact on onshore receptors and the proposed mitigation measures have taken into account the requirements of the river basin management plan to ensure all potential impacts on the water environment are mitigated to within acceptable levels. The Hydrology and Flood Risk Expert Working Group (EWG) met in May and August 2023 and January and May 2024 prior to the submission of the application. In attendance were representatives from stakeholders including the EA, Lancashire County Council, the Lead Local Flood Authority, and LPAs. The purpose of the EWG was to discuss hydrology and flood risk matters, as well as concerns from stakeholders, and to reach a solution. A summary of the key comments raised during consultation activities undertaken to date, specific to the FRA of the Transmission Assets is provided in Table 1.5 within Volume 3, Annex 2.3: Flood Risk Assessment of the ES (document reference F3.2.3). A technical meeting was also held with the EA in August 2024 to discuss
	Para 182	Applications which could affect drainage on or around the site should incorporate sustainable drainage systems to control flow rates and reduce volumes of runoff, and which are proportionate to the nature and scale of the proposal. These should provide multifunctional benefits wherever possible, through facilitating improvements in water quality and biodiversity, as well as benefits for amenity. Sustainable drainage systems provided as part of proposals for major developments should: a) take account of advice from the lead local flood authority; b) have appropriate proposed minimum operational standards; and c) have maintenance arrangements in place to ensure an acceptable standard of operation for the lifetime of the development.	

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			queries and proposed approach in relation to the items raised to inform the preparation of the hydrology and flood risk chapter of the Environmental Statement (ES) prior to submission of the application. Since Examination, the EA and Lead local Flood Authority maintained their representations with respect to flood risk considerations which were all resolved as evidenced in the Statement of Common Grounds with the EA and Lancashire County Council Lead Local Flood Authority (document ref: S_D1_6.6 and S_D1_6.1 respectively).
Coastal change	Para 183	In coastal areas, planning policies and decisions should take account of the UK Marine Policy Statement and marine plans. Integrated Coastal Zone Management should be pursued across local authority and land/sea boundaries, to ensure effective alignment of the terrestrial and marine planning regimes.	Elements of the Transmission Assets fall within the coastal area and an assessment regarding compliance with the UK Marine Policy Statement and the Northwest Inshore and Offshore Marine Plan has been carried out in each of the relevant topic chapters. A Marine Policies Tracker showing compliance is also provided as Appendix 2 to the Planning Statement (document reference J28.2). The impact on coastal processes and consideration of future baseline conditions are assessed in section 1.10 and section 1.5.5 of Volume 2, Chapter 1: Physical processes of the ES (document reference F2.1) respectively. Climate change and the impact of the proposed development are discussed in section 1.5.5 of Volume 2, Chapter 1: Physical processes of the ES (document reference F2.1).
	Para 184	Plans should reduce risk from coastal change by avoiding inappropriate development in vulnerable areas and not exacerbating the impacts of physical changes to the coast. They should identify as a Coastal Change Management Area any area likely to be affected by physical changes to the coast, and: (a) be clear as to what development will be appropriate in such areas and in what circumstances; and (b) make provision for development and infrastructure that needs to be relocated away from Coastal Change Management Areas.	
	Para 185	Development in a Coastal Change Management Area will be appropriate only where it is demonstrated that: a) it will be safe over its planned lifetime and not have an unacceptable impact on coastal change;	

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		b) the character of the coast including designations is not compromised; c) the development provides wider sustainability benefits; and d) the development does not hinder the creation and maintenance of a continuous signed and managed route around the coast	
Conserving and enhancing the natural environment	Para 187	Planning policies and decisions should contribute to and enhance the natural and local environment by: a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan);	The potential effects on internationally, nationally and locally designated sites for ecological or geological features of conservation importance have been assessed for the Transmission Assets. The details of nationally and regionally important sites are set out in section 1.6.2 of Volume 3, Chapter 1: Geology, hydrogeology and ground conditions of the ES (document reference F3.1). The potential impacts to these sites of geological interest are set out in section 1.11.2 of Volume 3, Chapter 1: Geology, hydrogeology and ground conditions of the ES (document reference F3.1). The design of the Transmission Assets seeks to avoid harm to designated sites of geological interest and the approach to site selection and consideration of alternatives is set out in Volume 1, Chapter 4 Site selection and consideration of alternatives of the ES (document reference F1.4). Volume 3, Chapter 10: Landscape and visual resources of the ES (document reference F3.10) concludes the majority of landscape and visual effects of the Transmission Assets are considered not to be significant and those which have been identified as significant are related to temporary impacts during construction and early operation (year 1) with no significant permanent visual effects predicted by Year 15, once the landscape proposals, as set out in the Outline Landscape Management Plan (document reference J2) and Outline Design Principles document (oDP) (document reference J3) have become established.

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			Where practicable, the Applicants have looked to provide a coordinated approach to the design and development of mitigation and enhancement measures. The Applicants have prepared the oDP (document J3) to demonstrate compliance with best practice and policy guidance on good design. The principles of the oDP seek to guide the design process towards design outcomes that ensure that the substation sites would fit sensitively into the local context; mitigate (as far as possible) adverse environmental effects and respect local communities.
		b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;	Justification for the location of the Transmission Assets, including a description of the design and/or environmental constraints considered as part of the iterative design process, is set out in Volume 1, Chapter 4: Site selection and consideration of alternatives of the ES. A range of sites were considered during site selection using provisional and detailed source mapping. The Applicants acknowledge that all potential sites were likely to contain some BMV land, particularly sub-grade 3A, and that this was considered alongside other factors in the selection process. In relation to the permanent loss of the best and most versatile land, Table 4.7 of F1.4.3 contains the BRAG assessment of the Onshore Substations zones. All zones were identified to have intermediate potential to constrain development meaning that the impact to Best and Most Versatile Land could not be avoided. The potential impacts of the Transmission Assets with respect to agricultural land, including best and most versatile soils are identified in section 6.6 of Volume 3, Chapter 6: Land Use and Recreation of the ES (document reference F3.6).

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			The installation of the onshore cable corridor would only result in the temporary loss of agricultural land including best and most versatile land. This is because the cables will be buried for their entire length and the land reinstated post-construction. The only areas where there are permanent losses of agricultural land are at the onshore substation sites and link boxes along the onshore cable corridor. However the highest quality Grade 1 within the definition of best and most versatile land was avoided and the detailed survey work undertaken at the onshore substation sites has identified them to comprise only areas of Subgrade 3a land which comprise the lowest quality land within the definition of best and most versatile land.
		c) maintaining the character of the undeveloped coast, while improving public access to it where appropriate;	PRoW, National Trails, coastal access and other rights of access to land within or near the Onshore Order Limits are identified in section 6.6 and assessed in section 6.11 of Volume 3, Chapter 6: Land Use and Recreation of the ES (document reference F3.6). As described in Volume 1, Chapter 3 ('Project Description'), Section 3.14 ('Landfall including intertidal area'), there are works broadly anticipated to be undertaken on the beach, between the Lytham St Annes Dunes SSSI and MLWS. As set out in the Outline Open Space Management Plan that has been appended to the Outline PRoW Management Plan (document reference J1.5) during these works, for the safety of the public, the discrete areas of the beach where these works are taking place will be closed. For works happening in a relatively small, discrete area, such as work at compounds Morgan and Morecambe Offshore Wind Farms: Transmission Assets Outline Public Rights of Way Management Plan Page 33 and cofferdams, only the immediate vicinity will

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			be closed and demarcated with fencing or other appropriate barriers. Detailed management measures for how such closures at the Beach would be accomplished and will be agreed with the relevant Local Authorities as part of the detailed PRoW Management Plan(s). All designated features of the Lytham St. Annes dunes SSSI are located above MHWS and are therefore assessed in Volume 3, Chapter 3: Onshore ecology and nature conservation of the ES (document reference F3.3). Additionally CoT44 (Volume 1, Annex 5.3 of the ES (document reference F1.5.3)) sets out that the installation of the onshore export cable corridor at Lytham St Annes SSSI and the St Anne's Old Link Golf Course will be undertaken by direct pipe trenchless installation technique. The exit pits associated with the direct pipe installation will be at least 100 m seaward of the western boundary of the SSSI to avoid direct impacts.
		d) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures and incorporating features which support priority or threatened species such as swifts, bats and hedgehogs;	Volume 1, Chapter 4: Site selection and consideration of alternatives of the ES (document reference F1.4) sets out the measures taken to avoid ecological features, where practicable. Details of the mitigation measures proposed are set out in section 4.8 of Volume 3, Chapter 4: Onshore and intertidal ornithology of the ES (document reference F3.4) and Volume 3, Chapter 3: Ecology and nature conservation of the ES (document reference F3.3). Commitments made as part of the Transmission Assets include measures to conserve biodiversity in terms of ecological interests. Habitat creation and enhancement measures necessary to compensate for the adverse effects of the project are described in the Outline Ecological Management Plan (oEMP) (document reference J9). The outline management plan was

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			developed to fulfil the requirement of managing risks to sensitive ecological receptors during construction and operation of the Transmission Assets. The oEMP includes measures such as 'toolbox talks' to raise awareness among contractors during construction and the use of Ecological Clerk of Works during construction. This will provide biodiversity awareness training to employees and contractors to avoid unnecessary adverse impacts on biodiversity. Detailed Ecological Management Plans will be submitted to satisfy DCO Requirement 12 of Schedules 2A and B (C1 F07) once the detailed design of the scheme has been completed, and following the results obtained from preconstruction ecology surveys. This will include details on long-term management and monitoring, as summarised in section 1.7 of the oEMP. Although the Transmission Assets are not subject to mandatory net gain requirement under the Environment Act 2021, the Applicants have worked with statutory consultees to discuss the approach and to develop the design to allow the maximum benefit to biodiversity within the parameters of the Project. The mechanisms through which overall net benefit to biodiversity would be delivered as part of the Transmission Assets are described in the Outline Biodiversity Benefit Management Plan (document reference J11/F06) which has been provided as part of the application for development consent and provides information on the habitat connectivity provided by the project. A Biodiversity Benefit Supporting Statement (S_D5_11) also provides details on the biodiversity approach being taken.

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		e) preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans; and	Detailed assessments are provided within all topic chapters within Volumes 2 to 4 of the ES (document reference F2 to F4). As set out in every ES chapter, mitigation measures have been developed to primarily avoid, then prevent, reduce or offset significant adverse environmental effects. Whilst the Transmission Assets have the potential to cause statutory nuisance, it is not expected to arise and the above chapters have concluded there will be no significant effects arising from the Transmission Assets in relation to noise, vibration, or dust emissions during the construction, operation and maintenance, or decommissioning phases. The draft DCO (C1/F08) contains a provision at Article 8 (Defence to proceedings in respect of statutory nuisance) that would provide a defence to proceedings for statutory nuisance under the terms of the DCO. Pollution prevention and reduction is discussed further in the Outline CoCP (document reference J1), which is appended with a number of outline management plans all to ensure appropriate measures are included to prevent and control effects during construction and decommissioning, this includes: • J1.1 Outline Communications Plan • J1.2 Outline Dust Management Plan • J1.3 Outline Construction Noise and Vibration Management Plan • J1.4 Outline Pollution Prevention Plan • J1.5 Outline Public Rights of Way (PRoW) Management Plan • J1.6 Outline site waste management plan

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			• J1.7 Outline soil management plan • J1.8 Outline Spillage and Emergency Response Plan • J1.9 Surface and groundwater management plan • J1.10 Outline Construction Fencing Plan • J1.11 Outline Construction Artificial Light Management Emissions Plan • J1.12 Outline Biosecurity protocol • J1.13 Outline Bentonite Breakout Plan September • J1.14 Outline contaminated land and groundwater discovery strategy
		f) remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate.	The risks posed by land contamination are considered in a qualitative assessment summarised in section 1.6.6 and section 1.11 of Volume 3 Chapter 1: Geology, hydrology and ground conditions of the ES (document reference F3.1), with further details of baseline conditions provided in Volume 3, Annex 1.1: Phase 1 Geo-Environmental Preliminary Risk Assessment of the ES (document reference F3.1.1). Overall, it is concluded that there will be no significant effects arising from the Transmission Assets during the construction, operation and maintenance or decommissioning phases, with all mitigation in place.
	Para 188	Plans should: distinguish between the hierarchy of international, national and locally designated sites; allocate land with the least environmental or amenity value, where consistent with other policies in this Framework; take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure; and plan for the enhancement of natural capital at a catchment or landscape scale across local authority boundaries.	The level of importance of ecological features is discussed in Section 3.6 and summarised in Table 3.15 of Volume 3, Chapter 3: Ecology and nature conservation of the ES (document reference F3.3). Likely significant effects on designated sites have been taken into account in the site selection process and are considered in Volume 3 Chapter 1: Geology, hydrogeology and ground conditions of the ES (document reference F3.1), Volume 3, Chapter 3:

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			Ecology and nature conservation of the ES (document reference F3.3) and Volume 3, Chapter 4: Onshore and intertidal ornithology of the ES (document reference F3.4).
	Para 189	Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty which have the highest status of protection in relation to these issues. The conservation and enhancement of wildlife and cultural heritage are also important considerations in these areas, and should be given great weight in National Parks and the Broads. The scale and extent of development within all these designated areas should be limited, while development within their setting should be sensitively located and designed to avoid or minimise adverse impacts on the designated areas.	There are no such designated areas within the Transmission Assets Order Limits.
	Para 190	When considering applications for development within National Parks, the Broads and Areas of Outstanding Natural Beauty, permission should be refused for major development other than in exceptional circumstances, and where it can be demonstrated that the development is in the public interest. Consideration of such applications should include an assessment of: a) the need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy; b) the cost of, and scope for, developing outside the designated area, or meeting the need for it in some other way; and c) any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated.	There are no such designated areas within the Transmission Assets Order Limits.
Habitats and biodiversity	Para 192	To protect and enhance biodiversity and geodiversity, plans should:	A full list of all measures proposed to protect and enhance biodiversity and geodiversity is set out in

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		a) Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity; wildlife corridors and stepping stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation; and b) promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity.	Volume 1, Annex 5.3: Commitments Register (document reference F1.5.3). This includes measures to conserve biodiversity in terms of ecological interests. Potential impacts on ancient woodland and ancient and veteran trees are set out in section Volume 3, Chapter 3: Ecology and nature conservation of the ES (document reference F3.3), which demonstrates that there will be no adverse effects on them. The locations of veteran trees are set out in Volume 3, Annex 10.5: Tree survey and arboricultural impact assessment of the ES (document reference F3.10.5). The outline Arboriculture Method Statement (S_D5_10) sets out measures that will be implemented for the protection and removal of trees during the construction of the onshore and intertidal elements of the Transmission Assets, to reduce impacts to trees, as far as possible. In relation to ancient woodlands/veteran trees, measures include buffer zones and tree protection fencing and no works will be carried out within the ancient woodlands/veteran tree buffer zones unless otherwise specified within the detailed Aboriculture Method Statement, which will be developed post-consent, prior to the commencement of construction of the Transmission Assets and will be in accordance with the outline Aboriculture Method Statement (S_D5_10 F01). The other irreplaceable habitat present within the study and survey area is the coastal sand dunes at Lytham St Anne's Dunes SSSI, the potential impacts on which are set out in section 3.6 of Volume 3, Chapter 3: Ecology and nature conservation of the ES (document reference F3.3). This demonstrates that the integrity of the sand dunes would not be adversely affected and impacts on them would be avoided through the use of trenchless techniques to install the onshore cables.

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			The levels of importance of ecological features are discussed in Section 3.6 and summarised in Table 3.15 of Volume 3, Chapter 3: Ecology and nature conservation of the ES (document reference F3.3). Although there is not currently a mandatory requirement for 10% net gain, or any guidance on the approach to undertaking a BNG assessment for projects seeking a DCO, the Applicants have undertaken a voluntary BNG assessment for permanent habitat losses arising from the new substations using the statutory DEFRA metric calculator tool (document reference: J11/F06 Outline Biodiversity Benefit Management Plan). The BNG assessment has demonstrated that the projects can deliver measurable biodiversity net gain and sets out how and where the Applicants would do this. The mechanisms through which overall net benefit to biodiversity would be delivered as part of the Transmission Assets are described in the Outline Biodiversity Benefit Management Plan (document reference J11/F06) which has been provided as part of the application for development consent and provides information on the habitat connectivity provided by the project. A Biodiversity Benefit Supporting Statement (S_D5_11) also provides details on the biodiversity approach being taken.
	Para 193	When determining planning applications, local planning authorities should apply the following principles: a) if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused; b) development on land within or outside a Site of Special Scientific Interest, and which is likely to have an adverse effect	The Secretary of State is the decision maker for the Transmission Assets. Notwithstanding this, the Applicants consider the Transmission Assets to be compliant with this paragraph of the NPPF. Potential impacts on ancient woodland and ancient and veteran trees are set out in section 3.11 of Volume 3, Chapter 3: Ecology and nature conservation of the ES (document reference F3.3), which demonstrates that there will be no adverse effects on them.

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		on it (either individually or in combination with other developments), should not normally be permitted. The only exception is where the benefits of the development in the location proposed clearly outweigh both its likely impact on the features of the site that make it of special scientific interest, and any broader impacts on the national network of Sites of Special Scientific Interest; c) development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists; and d) development whose primary objective is to conserve or enhance biodiversity should be supported; while opportunities to improve biodiversity in and around developments should be integrated as part of their design, especially where this can secure measurable net gains for biodiversity or enhance public access to nature where this is appropriate.	The other irreplaceable habitat present within the study and survey area is the coastal sand dunes at Lytham St Anne's Dunes SSSI, the potential impacts on which are set out in section 3.6 of Volume 3, Chapter 3: Ecology and nature conservation of the ES (document reference F3.3). This demonstrates that the integrity of the sand dunes would not be adversely affected and impacts on them would be avoided through the use of trenchless techniques to install the onshore cables. Further, although there is not currently a mandatory requirement for 10% net gain, or any guidance on the approach to undertaking a BNG assessment for projects seeking a DCO, the Applicants have undertaken a voluntary BNG assessment for permanent habitat losses arising from the new substations using the statutory DEFRA metric calculator tool (document reference: J11 Onshore Biodiversity Benefit Statement). The BNG assessment has demonstrated that the projects can deliver measurable biodiversity net gain and sets out how and where the Applicants would do this.
	Para 194	The following should be given the same protection as habitats sites: a) potential Special Protection Areas and possible Special Areas of Conservation; b) listed or proposed Ramsar sites; and c) sites identified, or required, as compensatory measures for adverse effects on habitats sites, potential Special Protection Areas, possible Special Areas of Conservation, and listed or proposed Ramsar sites.	The Information to Support Appropriate Assessment (ISAA) does not predict any adverse effects on integrity of any SAC, SPA or Ramsar and as such, no compensatory measures are considered necessary for the purposes of the HRA process. Within the HRA, three mitigation areas were proposed to reduce the effects, and throughout the examination process the issue of compensation versus mitigation has been tested by the ExA. In response to ExA Q2:9.1.9 Natural England state:

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			"Lytham Moss and Newton-with-Scales were proposed by the Applicant to avoid or reduce impacts to FLL impacted by the temporary activities along the terrestrial cable route, they were not proposed to compensate for unavoidable residual impacts within the SPA. Therefore, our view is that it is acceptable to consider Lytham Moss and Newton-with-Scales as mitigation rather than compensation areas." In addition, Natural England have been able to rule out AEoI for impacts at the landfall, therefore the remaining mitigation area at Fairhaven Saltmarsh is now considered as an alleviation measure with no need for compensatory measures.
	Para 195	The presumption in favour of sustainable development does not apply where the plan or project is likely to have a significant effect on a habitats site (either alone or in combination with other plans or projects), unless an appropriate assessment has concluded that the plan or project will not adversely affect the integrity of the habitats site.	As set out above, there will be no loss or adverse effects on the integrity of irreplaceable habitats as a result of the Transmission Assets. The presumption in favour of sustainable development therefore applies to the Transmission Assets.
Ground Conditions and Pollution	Para 196	Planning policies and decisions should ensure that: a) a site is suitable for its proposed use taking account of ground conditions and any risks arising from land instability and contamination. This includes risks arising from natural hazards or former activities such as mining, and any proposals for mitigation including land remediation (as well as potential impacts on the natural environment arising from that remediation); b) after remediation, as a minimum, land should not be capable of being determined as contaminated land under Part IIA of the Environmental Protection Act 1990; and c) adequate site investigation information, prepared by a competent person, is available to inform these assessments.	Historical quarrying and mining activities and ground conditions have been identified in Volume 3, Chapter 1: Geology, hydrogeology and ground conditions of the ES (document reference F3.1). Effects on groundwater are considered in section 1.11 of Volume 3, Chapter 1: Geology, hydrogeology and ground conditions of the ES (document reference F3.1) and details from the contaminated land register have been sought through consultation with the local authorities. A Preliminary Risk Assessment is provided in Volume 3, Annex 1.1: Phase 1 Geo-Environmental Preliminary Risk Assessment of the ES (document reference F3.1.1). A ground investigation will be completed with an assessment of the potential

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	Para 197	Where a site is affected by contamination or land stability issues, responsibility for securing a safe development rests with the developer and/or landowner.	risks arising from any contamination identified and a remediation strategy prepared as necessary. Mitigation measures proposed by the Transmission Assets include: • Construction to be undertaken in accordance with a Code of Construction practice (CoCP), including measures to maintain and address pollution prevention and geology and ground conditions. • A Pollution Prevention Plan (to form part of the CoCP), including good practice pollution control measures. • A Land and Groundwater Contamination Discovery Strategy to identify any suspected areas of contamination and any remedial measures which may be required. • Appropriate Personal Protective Equipment will be used and relevant good working practices applied to avoid potential risk to human health, including from any potential ground contamination, in line with relevant available guidance. • Where suspected contamination is present and piling is proposed, a detailed piling risk assessment will be developed prior to the commencement of construction. Consultation with the Environment Agency will be sought.
	Para 198	Planning policies and decisions should also ensure that new development is appropriate for its location taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site or the wider area to impacts that could arise from the development. In doing so they should:	The design and siting of Transmission Assets has sought to reduce environmental impacts and to orientate the proposed converter stations to respond to its context as presented in Volume 1, Chapter 4: Site selection (document reference F1.4). A cumulative assessment is provided within each ES topic chapter and concludes that

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		a) mitigate and reduce to a minimum potential adverse impacts resulting from noise from new development – and avoid noise giving rise to significant adverse impacts on health and the quality of life; b) identify and protect tranquil areas which have remained relatively undisturbed by noise and are prized for their recreational and amenity value for this reason; and c) limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation.	the Transmission Assets will not result in significant cumulative impacts. Impacts during construction, operation and maintenance and decommissioning of the Transmission Assets on landscape and visual resources are considered in section 10.11 of Volume 3, Chapter 10: Landscape and visual resources of the ES (document reference F3.10). With regard to noise sensitive receptors the glossary of F3.8.2 and F3.8.3 includes examples of noise sensitive areas: 'Receptors which are potentially sensitive to noise. Examples include residential properties, education facilities, community facilities, quiet areas, international and national or statutorily designated sites, public rights of way and cultural heritage assets'. The effects of noise pollution on human and ecological receptors are considered in Volume 3, Chapter 8: Noise and vibration (document reference F3.8) and Chapter 3: Ecology and nature conservation of the ES (document reference F3.3) respectively. Construction noise and vibration control measures will be outlined in the Outline Construction Noise and Vibration Management Plan (document reference J1.3). This sets out the key management and monitoring procedures that will be adopted during the onshore site preparation works and construction of the Transmission Assets. The main objective is to minimise noise and vibration impacts on nearby residents and other sensitive receptors to acceptable levels in accordance with British Standard (BS) 5228:2009+A1:2014 or other relevant guidance agreed in consultation with the relevant planning authority. Examples of noise control management measures, provided at Table 1.1 of the oNVMP include, inter alia, localised acoustic screening including earth bunds, use of rotary drills and boring plant inside acoustic sheds with

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			adequate ventilation and the reduction of simultaneous plant use. For the operational and maintenance phase, measures to manage and monitor noise will be detailed within the Operational Noise Management Plan(s) to be approved by the relevant planning authorities, as secured by Requirement 18 of Schedules 2A and 2B of the DCO. Fylde Borough Council agrees that this Requirement represents reasonable control of operational noise from the Onshore Substations (FBC.NV.16 of Fylde SoCG (S_D1_6.3 F03)) and therefore no further measures to control operational noise are required. Regarding light emissions, the Applicant has prepared an Outline Construction Artificial Light Management Emissions Plan which forms an appendix to the Outline Code of Construction Practice (CoCP) (document reference J1. The Applicants have committed to implementation of detailed Construction Artificial Light Emissions Management Plan(s) via CoT28 (see Volume 1, Annex 5.3: Commitments Register, document reference F1.5.3, which will require approval by the relevant planning authority following consultation with relevant stakeholders. The measures within the outline management plan are in accordance with best practice and are appropriate to manage the impacts associated with onshore site preparation works. The Applicants will give specific consideration regarding the control of construction artificial light emissions at receptors identified as having increased sensitivity or requiring receptor specific mitigation, including Century Care Home. The Applicants' Statutory Nuisance Statement (J29) considers potential sources of nuisance under s79(1) of the Environmental Protection Act 1990. It confirms that:

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			"Following adherence to the measures set out in the plans described no significant residual impacts are predicted in relation noise, air quality and light emissions therefore, they are not expected to engage Section 79(1)."
	Para 199	Planning policies and decisions should sustain and contribute towards compliance with relevant limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas and Clean Air Zones, and the cumulative impacts from individual sites in local areas. Opportunities to improve air quality or management, and green infrastructure provision and enhancement. So far as possible these opportunities should be considered at the plan-making stage, to ensure a strategic approach and limit the need for issues to be recognised when determining individual applications. Planning decisions should ensure that any new development in Air Quality Management Areas and Clean Air Zones is consistent with the local air quality action plan.	The air quality impacts during the construction and decommissioning phases of the Transmission Assets have been described and considered within section 9.11.2 (dust) and section 9.11.3 (emissions from traffic) with mitigation proposed at Table 9.15 of Volume 3, Chapter 9: Air Quality of the ES (document reference F3.9). Overall, it is concluded that there will be no significant effects arising from the Transmission Assets during the construction, operation and maintenance or decommissioning phases in relation to dust and construction traffic related emissions.
Proposals affecting heritage assets	Para 207	In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance. As a minimum the relevant historic environment record should have been consulted and the heritage assets assessed using appropriate expertise where necessary. Where a site on which development is proposed includes, or has the potential to include, heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation.	Relevant heritage assets are identified within Volume 3, Chapter 5: Historic environment of the ES (document reference F3.5). The baseline historic environment has been established through a review of available information acquired from appropriate sources including the National Heritage List for England (NHLE), the Lancashire Historic Environment Record (HER) and the Lancashire Archives. A description of the baseline heritage assets is provided in section 5.6.2 of Volume 3, Chapter 5: Historic environment of the ES (document reference F3.5) and in Volume 3, Annex 5.1: Historic environment desk-based assessment of the ES (document reference F3.5.1).

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	Para 208	Local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this into account when considering the impact of a proposal on a heritage asset, to avoid or minimise any conflict between the heritage asset's conservation and any aspect of the proposal.	A description of the significance of the assets affected is also provided within this chapter and the impact of the Transmission Assets on the significance of heritage assets is clearly assessed within section 5.11 of Volume 3, Chapter 5: Historic environment (document reference F3.5). This assessment has not identified any impact that would result in substantial harm or loss of a designated heritage asset. The assessment carried out has confirmed that no significant effects in relation to the historic environment have been identified, with effects resulting in less than substantial harm to the significance of designated or non-designated heritage assets. None of the identified impacts would represent substantial harm as this is a particularly high test.
	Para 209	Where there is evidence of deliberate neglect of, or damage to, a heritage asset, the deteriorated state of the heritage asset should not be taken into account in any decision.	
Considering potential impacts	Para 212	When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.	
	Para 213	Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification. Substantial harm to or loss of: a) grade II listed buildings, or grade II registered parks or gardens, should be exceptional; b) assets of the highest significance, notably scheduled monuments, protected wreck sites, registered battlefields, grade I and II* listed buildings, grade I and II* registered parks and gardens, and World Heritage Sites, should be wholly exceptional.	
	Para 214	Where a proposed development will lead to substantial harm to (or total loss of significance of) a designated heritage asset, local planning authorities should refuse consent, unless it can	

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		be demonstrated that the substantial harm or total loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply: a) the nature of the heritage asset prevents all reasonable uses of the site; and b) no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation; and c) conservation by grant-funding or some form of not for profit, charitable or public ownership is demonstrably not possible; and d) the harm or loss is outweighed by the benefit of bringing the site back into use.	
	Para 215	Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.	
	Para 216	The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.	
	Para 219	Local planning authorities should look for opportunities for new development within Conservation Areas and World Heritage Sites, and within the setting of heritage assets, to enhance or better reveal their significance. Proposals that preserve those elements of the setting that make a positive contribution to the asset (or which better reveal its significance) should be treated favourably.	