MORGAN AND MORECAMBE OFFSHORE WIND FARMS: TRANSMISSION ASSETS

Planning Statement

Deadline: Deadline 7

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Prepared for:

Morgan Offshore Wind Limited, Morecambe Offshore Windfarm Ltd

Executive summary

E.1 This Planning Statement has been prepared for the Morgan and Morecambe Offshore Wind Farms: Transmission Assets (referred to hereafter as the 'Transmission Assets') on behalf of the Applicants, Morgan Offshore Wind Limited (Morgan OWL) and Morecambe Offshore Windfarm Ltd (Morecambe OWL) and accompanies an application for development consent under section 37 of the Planning Act 2008.

E.2 The Transmission Assets are required to connect the Generation Assets (Morgan Offshore Wind Project and the Morecambe Offshore Windfarm) to the National Grid, which will consist of the following.

- Offshore: offshore export cables.
- Landfall site.
- Onshore: onshore export cables, onshore substations, 400 kV grid connection cables, environmental mitigation areas and biodiversity benefit areas.

E.3 The offshore elements of the Transmission Assets are located in the east Irish Sea wholly within English offshore and inshore waters, whilst the onshore elements are located within the local authority areas of Fylde Council, Blackpool Council, South Ribble Borough Council, Preston City Council and Lancashire County Council.

E.4 Delivery of the Transmission Assets would contribute promptly to:

- 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 UKs response to the climate change crisis.

E.5 The Morgan and Morecambe offshore wind farms, 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 emissions reduction targets.

E.6 The national and international policy commitments described in this Planning Statement demonstrate the need for renewable energy and, specifically, for offshore wind, in order to meet climate commitments and contribute to addressing the climate crisis. This need is confirmed within the National Policy Statements (NPSs).

E.7 NPS EN-1 presents a compelling case for the need for new electricity generating capacity in order to meet the UK's net zero target by 2050 and the urgent need for new electricity generating capacity to meet this objective. This need covers both offshore wind farms and the transmission infrastructure required to connect them to the UK electricity transmission network. Delivering that change is a major challenge, particularly within a

market-based system and with severe constraints on public expenditure in the short term. NPS EN-1 (paragraph 1.3.10) confirms that the NPSs are the principal policy in the determination of electricity infrastructure projects subject to a section 35 direction.

E.8 Paragraphs 3.3.62 and 4.2.4 of NPS EN-1 confirm that the Government:

'… has concluded that there is a critical national priority (CNP) for the provision of nationally significant low carbon infrastructure.'

E.9 The Transmission Assets are of the type considered to be CNP infrastructure in NPS EN-1 (being the transmission works for an essential part of low carbon energy projects and directed into the regime under section 35 of the Planning Act 2008). The Applicants therefore consider that the Transmission Assets benefit from the policy support provided to CNP infrastructure.

E.10 The strengthened presumptions in favour of CNP infrastructure set out that '…in all but the most exceptional circumstances, it is unlikely that consent will be refused on the basis of these residual impacts.'

E.11 NPS EN-1 therefore confirms that the 'Government strongly supports the delivery of CNP Infrastructure, and it should be progressed as quickly as possible' (paragraph 3.3.63).

E.12 NPS EN-3 states that the government expects offshore wind to play a significant role in decarbonising the energy system. It confirms that the government has set an ambitious target to have 50 GW of offshore wind capacity by 2030, with an expectation that there will be a need for substantially more installed offshore capacity beyond this to achieve net zero by 2050.

E.13 NPS EN-5 sets out important considerations for electricity networks infrastructure, including consenting, siting and design considerations. Section 2.7 of EN-5 sets out the general assessment principles for transmission infrastructure in circumstances in which generating stations and their related infrastructure will be contained in separate applications (the example is given of a connection for multiple generation projects, as is the case for the Transmission Assets). This refers back to NPS EN-1. Paragraph 2.7.3 of NPS EN-5 recognises that there may be circumstances in which a single application contains works relating to multiple generation projects and that this will be acceptable where those works meet the need set out in EN-1. Section 2.13 confirms policy support for a coordinated approach. As identified through this Planning Statement, the Transmission Assets are recognised as transmission and energy infrastructure within the scope of NPS EN-5 and considered as nationally significant in their own right, but also as a key element required in connection with offshore wind generation and are therefore of the type considered to be CNP infrastructure in EN-1.

E.14 This Planning Statement sets out the compliance of the Transmission Assets with national and local policy. It is shown that the application is consistent with the relevant NPSs, in accordance with section 104 of the Planning Act 2008. There is a presumption in favour of applications which accord with any relevant NPSs, in particular those projects for which a CNP has been established.

E.15 Considering this, NPS EN-1 confirms 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, providing the mitigation hierarchy requirements of NPS EN-1 have been met. The Applicants have explained their approach to mitigation through design and applied measures in each chapter of the ES, and provided a summary in REP5-132 in response to the ExA's second questions. In addition, Sections 1.3, 1.4 and 1.5 of the Green Belt 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. As such, the starting point for determination should be that the test for very special circumstances has been met. Notwithstanding this approach, robust very special circumstances do exist, which justify and outweigh the harms to be caused to the Green Belt, by reason of inappropriateness and any other harms (Section 1.7 of REP4-092).

E.16 This Planning Statement assesses the Transmission Assets against relevant NPSs, the National Planning Policy Framework (NPPF), marine policy and local planning authority policy considerations. The NPSs, primarily EN-1, EN-3 (as appropriate) and EN-5, are the primary policy for the Transmission Assets; the NPPF, marine policy and local planning policy are potentially material considerations under s104(2)(d) of the Planning Act 2008. This assessment demonstrates that the Transmission Assets accord with these policies.

E.17 The construction, operation and maintenance and decommissioning of the Transmission Assets would be carried out in accordance with the relevant NPSs and other identified material planning policy matters. Where there are predicted impacts from the Transmission Assets, appropriate and proportionate mitigation measures are proposed and secured through the requirements of the draft Development Consent Order and outline management plans.

E.18 The need for the Transmission Assets and offshore wind is clearly supported by the NPSs, in addition to wider governmental obligations and objectives relating to low carbon electricity generation, climate change and the economy.

E.19 In consideration of the matters set out in this Planning Statement, the Secretary of State can conclude that the application for the Transmission Assets:

- accords with the requirements of the Planning Act 2008;
- contributes to meeting renewable energy targets and providing energy security;
- assists in reducing carbon emissions;
- is CNP Infrastructure and should benefit from the NPS policy support provided to CNP infrastructure having demonstrably followed the mitigation hierarchy, bringing significant benefits from the delivery of two separate NSIPs that would outweigh any adverse impacts; and

- complies with the Environmental Impact Assessment and Habitats Regulations Assessment Regulations, national and local planning and marine policy.

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Glossary

Term	Meaning
400 kV grid connection cables	Cables that will connect the proposed onshore substations to the existing National Grid Penwortham substation.
400 kV grid connection cable corridor	The corridor within which the 400 kV grid connection cables will be located.
Applicants	Morgan Offshore Wind Limited (Morgan OWL) and Morecambe Offshore Windfarm Ltd (Morecambe OWL).
Baseline	The status of the environment without the Transmission Assets in place.
Biodiversity benefit	An approach to development that leaves biodiversity in a better state than before. Where a development has an impact on biodiversity, developers are encouraged to provide an increase in appropriate natural habitat and ecological features over and above that being affected. For the Transmission Assets, biodiversity benefit will be delivered within identified biodiversity benefit areas within the Onshore Order Limits. Further qualitative benefits to biodiversity are proposed via potential collaboration with stakeholders and local groups, contributing to existing plans and programmes, both within and outside the Order Limits.
Climate change	A change in global or regional climate patterns, in particular a change apparent from the mid to late 20th century onwards and attributed largely to the increased levels of atmospheric carbon dioxide produced by the use of fossil fuels.
Code of Construction Practice	A document detailing the overarching principles of construction, contractor protocols, construction-related environmental management measures, pollution prevention measures, the selection of appropriate construction techniques and monitoring processes.
Commitment	This term is used interchangeably with mitigation and enhancement measures. The purpose of commitments is to avoid, prevent, reduce or, if possible, offset significant adverse environmental effects. Primary and tertiary commitments are taken into account and embedded within the assessment set out in the ES.
Construction Traffic Management Plan	A document detailing the construction traffic routes for heavy goods vehicles and personnel travel, protocols for delivery of Abnormal Indivisible Loads to site, measures for road cleaning and sustainable site travel measures.
Contracts for Difference	Private contracts between a low carbon electricity generator and the UK Government owned Low Carbon Contracts Company.
Cumulative Effects	The combined effect of the Transmission Assets in combination with the effects from other proposed developments, on the same receptor or resource.
Design envelope	A description of the range of possible elements and parameters that make up the Transmission Assets options under consideration, as set out in detail in Volume 1, Chapter 3: Project Description. This envelope is used to define the Transmission Assets for EIA purposes when the exact engineering parameters are not yet known. This is also referred to as the Maximum Design Scenario or Rochdale Envelope approach.
Development Consent Order	An order made under the Planning Act 2008, as amended, granting development consent.

Term	Meaning
Environmental Impact Assessment	The process of identifying and assessing the significant effects likely to arise from a project. This requires consideration of the likely changes to the environment, where these arise as a consequence of a project, through comparison with the existing and projected future baseline conditions.
Environmental Statement	The document presenting the results of the Environmental Impact Assessment process.
Evidence Plan Process	A voluntary consultation process with specialist stakeholders to agree the approach to, and information to support, the EIA and Habitats Regulations Assessment processes for certain topics.
Generation Assets	The generation assets associated with the Morgan Offshore Wind Project and the Morecambe Offshore Windfarm include the offshore wind turbines, inter-array cables, offshore substation platforms and platform link (interconnector) cables to connect offshore substations.
Greenhouse gas	A gas that absorbs and emits radiant energy within the thermal infrared range, causing the greenhouse effect. Examples include carbon dioxide and methane.
Habitats Regulations	The Conservation of Habitats and Species Regulations 2017 (as amended) and the Conservation of Offshore Marine Habitats and Species Regulations 2017 (as amended).
Horizontal directional drilling	A trenchless technique for installing cables and cable ducts involving drilling in an arc between two points.
Inter-related Effects	Inter-related effects arise where an impact acts on a receptor repeatedly over time to produce a potential additive effect or where a number of separate impacts, such as noise and habitat loss, affect a single receptor.
Intertidal Infrastructure Area	The temporary and permanent areas between MLWS and MHWS.
Kyoto Protocol	The Kyoto Protocol is an international agreement linked to the United Nations Framework Convention on Climate Change, which commits its parties to reducing greenhouse gas emissions by setting internationally binding emission reduction targets, implemented primarily through national measures but also via wider market-based mechanism
Landfall	The area in which the offshore export cables make landfall (come on shore) and the transitional area between the offshore cabling and the onshore cabling. This term applies to the entire landfall area at Lytham St. Annes between Mean Low Water Springs and the transition joint bays inclusive of all construction works, including the offshore and onshore cable routes, intertidal working area and landfall compound(s).
Local Authority	A body empowered by law to exercise various statutory functions for a particular area of the United Kingdom. This includes County Councils, District Councils and County Borough Councils.
Local Planning Authority	The local government body (e.g., Borough Council, District Council, etc.) responsible for determining planning applications within a specific area.
Main rivers	The term used to describe a watercourse designated as a Main River under the Water Resources Act 1991 and shown on the Main River Map. These are usually larger rivers or streams and are managed by the Environment Agency.

Term	Meaning
Maximum design scenario	The realistic worst case scenario, selected on a topic-specific and impact specific basis, from a range of potential parameters for the Transmission Assets.
Mean High Water Springs	The height of mean high water during spring tides in a year.
Mean Low Water Springs	The height of mean low water during spring tides in a year.
Method Statements	A document that describes how a particular task or action should be undertaken correctly.
Mitigation measures	This term is used interchangeably with Commitments. The purpose of such measures is to avoid, prevent, reduce or, if possible, offset significant adverse environmental effects.
Morecambe Offshore Windfarm: Generation Assets	The offshore generation assets and associated activities for the Morecambe Offshore Windfarm.
Morecambe Offshore Windfarm: Transmission Assets	The offshore export cables, landfall, and onshore infrastructure required to connect the Morecambe Offshore Windfarm to the National Grid.
Morecambe OWL	Morecambe Offshore Windfarm Limited is owned by Copenhagen Infrastructure Partners' (CIP) fifth flagship fund, Copenhagen Infrastructure V (CI V).
Morgan and Morecambe Offshore Wind Farms: Transmission Assets	The offshore export cables, landfall, and onshore infrastructure for the Morgan Offshore Wind Project and the Morecambe Offshore Windfarm. This includes the offshore export cables, landfall site, onshore export cables, onshore substations, 400 kV grid connection cables and associated grid connection infrastructure such as circuit breaker compounds. Also referred to in this report as the Transmission Assets, for ease of reading.
Morgan Offshore Wind Project: Generation Assets	The offshore generation assets and associated activities for the Morgan Offshore Wind Project.
Morgan Offshore Wind Project: Transmission Assets	The offshore generation assets and associated activities for the Morgan Offshore Wind Project to the National Grid.
Morgan OWL	Morgan Offshore Wind Limited is a joint venture between JERA Nex bp (JNbp) and Energie Baden-Württemberg AG (EnBW).
National Grid Penwortham substation	The existing National Grid substation at Penwortham, Lancashire.
National Policy Statement(s)	The current national policy statements published by the Department for Energy Security and Net Zero in 2023 and adopted in 2024.
Non-statutory consultee	Organisations that an applicant may choose to consult in relation to a project who are not designated in law but are likely to have an interest in the project.
Offshore export cables	The cables which would bring electricity from the Generation Assets to the landfall.
Offshore export cable corridor	The corridor within which the offshore export cables will be located.
Offshore Order Limits	See Transmission Assets Order Limits: Offshore (below).
Onshore export cables	The cables which would bring electricity from the landfall to the onshore substations.

Term	Meaning
Onshore export cable corridor	The corridor within which the onshore export cables will be located.
Onshore Infrastructure Area	The area within the Transmission Assets Order Limits landward of Mean High Water Springs. Comprising the offshore export cables from Mean High Water Springs to the transition joint bays, onshore export cables, onshore substations and 400 kV grid connection cables, and associated temporary and permanent infrastructure including temporary and permanent compound areas and accesses. Those parts of the Transmission Assets Order Limits proposed only for ecological mitigation/biodiversity benefit are excluded from this area.
Onshore Order Limits	See Transmission Assets Order Limits: Onshore (below).
Onshore substations	The onshore substations will include a substation for the Morgan Offshore Wind Project: Transmission Assets and a substation for the Morecambe Offshore Windfarm: Transmission Assets. These will each comprise a compound containing the electrical components for transforming the power supplied from the generation assets to 400 kV and to adjust the power quality and power factor, as required to meet the UK Grid Code for supply to the National Grid.
Planning Inspectorate	The agency responsible for operating the planning process for applications for development consent under the Planning Act 2008.
Policy	A set of decisions by governments and other political actors to influence, change, or frame a problem or issue that has been recognised as in the political realm by policy makers and/or the wider public.
Preliminary Environmental Information Report	A report that provides preliminary environmental information in accordance with the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017. This is information that enables consultees to understand the likely significant environmental effects of a project, and which helps to inform consultation responses.
Renewable energy	Energy from a source that is not depleted when used, such as wind or solar power.
Safety zones	An area around a structure or vessel which should be avoided.
Scoping Opinion	Sets out the Planning Inspectorate's response (on behalf of the Secretary of State) to the Scoping Report prepared by the Applicants. The Scoping Opinion contains the range of issues that the Planning Inspectorate, in consultation with statutory stakeholders, has identified should be considered within the Environmental Impact Assessment process.
Scour protection	Protective materials to avoid sediment being eroded away from the base of the foundations due to the flow of water.
Special Areas of Conservation	A site designation specified in the Conservation of Habitats and Species Regulations 2017. Each site is designated for one or more of the habitats and species listed in the Regulations. The legislation requires a management plan to be prepared and implemented for each SAC to ensure the favourable conservation status of the habitats or species for which it was designated. In combination with Special Protection Areas and Ramsar sites, these sites contribute to the national site network.
Special Protection Areas	A site designation specified in the Conservation of Habitats and Species Regulations 2017, classified for rare and vulnerable birds, and for regularly occurring migratory species. Special Protection Areas contribute to the national site network.

Term	Meaning
Statutory consultee	Organisations that are required to be consulted by an applicant pursuant to section 42 of the Planning Act 2008 in relation to an application for development consent. Not all consultees will be statutory consultees (see non-statutory consultee definition).
Substation	Part of an electrical transmission and distribution system. Substations transform voltage from high to low, or the reverse by means of electrical transformers.
The Secretary of State for Energy Security and Net Zero	The decision maker with regards to the application for development consent for the Transmission Assets.
Transboundary effects	Effects from a project within one state that affect the environment of another state(s).
Transmission Assets	See Morgan and Morecambe Offshore Wind Farms: Transmission Assets (above).
Transmission Assets Order Limits	The area within which all components of the Transmission Assets will be located, including areas required on a temporary basis during construction and/or decommissioning (such as construction compounds).
Transmission Assets Order Limits: Offshore	The area within which all components of the Transmission Assets seaward of Mean Low Water Springs will be located, including areas required on a temporary basis during construction and/or decommissioning. Also referred to in this report as the Offshore Order Limits, for ease of reading.
Transmission Assets Order Limits: Onshore	The area within which all components of the Transmission Assets landward of Mean High Water Springs will be located, including areas required on a temporary basis during construction and/or decommissioning (such as construction compounds). Also referred to in this report as the Onshore Order Limits, for ease of reading.
Voltage	Voltage is the pressure from an electrical circuit's power source that pushes charged electrons (current) through a conducting loop.

Acronyms

Acronym	Meaning
AEZ	Archaeological Exclusion Zone
APFP	Applications: Prescribed Forms and Procedure Regulations 2009
BEIS	The former Department for Business, Energy and Industrial Strategy
BHS	Biological Heritage Site
BNG	Biodiversity Net Gain
CEA	Cumulative Effects Assessment
CfDs	Contracts for Difference
CNP	Critical National Priority
CoCP	Code of Construction Practice

Acronym	Meaning
COP	Conference of the Parties
CSIP	Cable Specification and Installation Plan
DCO	Development Consent Order
DPD	Development Plan Documents
EA	Environment Agency
EIA	Environmental Impact Assessment
EMF	Electromagnetic Fields
EMP	Environmental Management Plan
EMR	Electricity Market Reform
EnBW	Energie Baden-Württemberg AG
EPP	Evidence Plan Process
ES	Environmental Statement
FRA	Flood Risk Assessment
GCN	Great-crested newt
GHG	Greenhouse Gas
GVA	Gross Value Added
HDD	Horizonal Directional Drilling
HNDR	Holistic Network Design Review
HRA	Habitats Regulation Assessment
IEMA	Institute for Environmental Management and Assessment
INNS	Invasive Non-native Species
ISAA	Information to Support Appropriate Assessment
LLFA	Lead Local Flood Authority
LRN	Local Road Network
MCZ	Marine Conservation Zone
MDS	Maximum Design Scenario
MMMP	Marine Mammals Mitigation Protocol
MMO	Marine Management Organisation
Morecambe OWL	Morecambe Offshore Windfarm Ltd
Morgan OWL	Morgan Offshore Wind Limited
MPA	Marine Protected Areas
MPS	Marine Policy Statement
NDC	Nationally Determined Contribution

Acronym	Meaning
NGESO	National Grid Electricity System Operator
NIC	National Infrastructure Commission
NPPF	National Planning Policy Framework
NPS	National Policy Statement
NRW	Natural Resources Wales
NSIP	Nationally Significant Infrastructure Project
OCTMP	Outline Construction Traffic Management Plan
OTNR	Offshore Transmission Network Review
OWES	Offshore Wind Environmental Standards
PEIR	Preliminary Environmental Information Report
SAC	Special Area of Conservation
SNCB	Statutory Nature Conservation Bodies
SPA	Special Protection Area
SRN	Strategic Road Network
SSC	Suspended Sediment Concentration
SSSI	Site of Special Scientific Interest
SuDS	Sustainable drainage systems
UK	United Kingdom
UNFCC	United Nations Framework Convention on Climate Change
UXO	Unexploded Ordnance

Units

Unit	Description
%	Percentage
GW	Gigawatts
kg	Kilogram
km	Kilometres
m	Metres
MW	Megawatt
nm	Nautical mile

1 Planning Statement

1.1 Introduction

1.1.1.1 This Planning Statement has been prepared by RPS for the Morgan and Morecambe Offshore Wind Farms: Transmission Assets (referred to hereafter as the 'Transmission Assets'). The Applicants are Morgan Offshore Wind Limited (Morgan OWL), a joint venture between JERA Nex bp (JNbp) and Energie Baden-Württemberg AG (EnBW) and Morecambe Offshore Windfarm Ltd (Morecambe OWL), owned by Copenhagen Infrastructure Partners' (CIP) fifth flagship fund, Copenhagen Infrastructure V (CI V). This Planning Statement was submitted as part of the application for development consent for the Transmission Assets and has been updated to reflect the positions of the Applicants and other parties at the close of examination.

1.1.1.2 This Planning Statement was updated for Deadline 1 in response to the following Examining Authority Hearing Action Points arising out of Issue Specific Hearing 1:

- ISH1 Action Point 1 - Update planning statement clarifying applicants' position as to the application of section 104 Planning Act 2008.

1.1.1.3 This Planning Statement has been updated for Deadline 7 in response to the Examining Authority's (ExA) Rule 8 letter (PD-007) to include any necessary updates that have arisen out the Examination process, the submitted Local Impact Reports and to take into account any policy updates which may have occurred since the Transmission Assets was accepted for Examination.

1.1.1.4 The updates provided in the Planning Supporting Statement Addendum (S_D2_9) at Deadline 2 have also been incorporated into this updated Planning Supporting Statement for Deadline 7.

1.1.1.5 In addition, the NPS Policy Tracker (document reference J26 F02), NPPF Policy Tracker (document reference J28.1 F02) and Local Planning Policy Tracker (document reference J28.3 F02) have been updated for Deadline 7 as requested by the Rule 8 letter (PD-007).

1.1.1.6 The purpose of the Transmission Assets is to connect the Morgan Offshore Wind Project: Generation Assets and Morecambe Offshore Windfarm: Generation Assets (referred to collectively as the 'Generation Assets') to the National Grid at Penwortham in Lancashire, which will collectively provide a total of up to 2GW of renewable energy to the National Grid. A description of the Transmission Assets can be found in Volume 1, Chapter 3: Project description of the Environmental Statement (ES) (document reference F1.3) and a summary is provided in **section 2** of this Planning Statement.

1.1.1.7 This Planning Statement is one of a series of documents that accompanies the application to the Secretary of State (the Application) submitted in accordance with section 37 of the Planning Act 2008 and Regulations 5 and 6 of the Infrastructure Planning (Application: Prescribed Forms and Procedures) Regulations 2009 (the 'APFP Regulations'). The APFP Regulations do not require a planning statement to support applications for development consent; however, in order to assist the Secretary of State in

determining the application, it is considered helpful to bring all the principal matters together into one statement in order to consider them in the context of relevant policy.

1.1.1.8 The Transmission Assets have been subject to Environmental Impact Assessment (EIA), the 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 impacts on Natura 2000 or European sites, the outcomes of which have been reported in the Information to Support Appropriate Assessment (ISAA) report, HRA Stage 1 Screening Report and accompanying annexes (document references E2.1, 2.2, 2.3 and E3).

1.1.1.9 Aspects concerning the need for the Transmission Assets, the site selection process and alternative designs and technologies considered by the Applicants during the design development process are explained fully in Volume 1, Chapter 4: Site selection and consideration of alternatives of the ES (document reference F1.4) and presented, where relevant, within **section 5** of this Planning Statement. The legislative and policy context relating to renewable energy and the associated environmental assessments undertaken in relation to the Transmission Assets is set out in Volume 1, Chapter 2: Policy and legislative context of the ES (document reference F1.2). Other, more specific legislation and policy is set out as necessary in the various topic chapters of the ES. A detailed policy tracker for the National Policy Statements (NPSs), is provided as document reference J26. Trackers that cover the detail of compliance with the National Planning Policy Framework (NPPF), the relevant marine policy, and local policies are provided as annexes to this Planning Statement (document references J28.1, J28.2 and J28.3 respectively).

1.1.1.10 The outcomes of the EIA (in the form of the ES) and the HRA (in the form of the ISAA) processes have informed the content of this Planning Statement, specifically in relation to assisting the determination of accordance of the Transmission Assets with relevant the NPSs as the primary policy (EN-1, EN-3 (as appropriate) and EN-5) with the NPPF, relevant marine policy and local planning policy also potential material considerations in accordance with section 104(2)(d) of the Planning Act 2008. .

1.1.1.11 This Planning Statement considers the likely impacts and effects of the Transmission Assets in the context of relevant policy, whilst bringing together the principal matters relevant to each chapter of the ES during the construction, operation and maintenance, and decommissioning phases. It covers both the onshore and offshore elements of the Transmission Assets. It is structured as follows.

- **Section 1**: Introduction.
- **Section 2**: Location and project description.
- **Section 3**: Legislation, policy and guidance.
- **Section 4**: Need for the Transmission Assets.
- **Section 5**: Accordance with NPSs and other national and local policy.

- **Section 6**: Balance of considerations and overall conclusions.

1.2 About the Applicants

1.2.1.1 As stated in **section 1.1,** the Applicants are Morgan OWL and Morecambe OWL. Morgan OWL is a joint venture between JERA Nex bp (JNbp) and Energie Baden-Württemberg AG (EnBW) and Morecambe OWL is owned by Copenhagen Infrastructure Partners' (CIP) fifth flagship fund, Copenhagen Infrastructure V (CI V).

1.2.1.2 JERA Nex bp Limited combines JERA Nex Limited and bp's offshore wind portfolio and project management expertise to create a new standalone equally owned joint venture with a strategic commitment to grow and become a top tier global offshore wind developer and operator. JERA Nex bp Limited is a strategic platform for growth, combining high-quality operating assets with a total potential net generating capacity of 13GW. The formation of JERA Nex bp Limited was intended to accelerate development from the combined pipeline and bolster access to competitive financing. The business will also draw on and benefit from the global trading capabilities of both partners to manage and market power from its assets into various offtake channels.

1.2.1.3 JERA Nex Limited in 100% owned by JERA Co Inc (JERA). JERA is Japan's largest power company and one of the world's largest electricity producers. JERA owns and operates wind farms in Belgium, Germany, Japan and Taiwan and has developed portfolio that includes projects in Japan, Ireland and Australia. bp has been building a portfolio in offshore wind since 2019 and now has a development pipeline with total potential generating capacity of 9.7GW net (5.7GW development projects and a further 4GW secured leases). Development projects are the Morgan and Mona projects in the UK Irish Sea, and Oceanboat East and Oceanboat West in Germany's North Sea, with secured leases off Scotland and the east coast of the US.

1.2.1.4 CIP was founded in 2012 and is the world's largest fund manager focused on renewable energy investments. It manages over 32 billion euros in assets over 13 different funds.

1.2.1.5 CIP has a 50GW global offshore wind portfolio and across over 30 different markets has over 160GW of renewable energy projects in development. Within the UK, CIP has a 25GW pipeline, including a 30% share in the Ossian Offshore Wind Farm in Scotland. At up to 3.6GW capacity, this will be one of the world's largest floating offshore wind farms. CIP is also the majority shareholder in the Pentland Floating Offshore Wind Demonstrator, a 100MW floating project in development off the north coast of Scotland.

2 Location and project description

2.1 Project location

2.1.1.1 The Transmission Assets are located within the Transmission Assets Order Limits shown on **Figure 2.1** and described in **section 2.2**.

2.1.1.2 The offshore elements of the Transmission Assets are located in the east Irish Sea wholly within English offshore waters (beyond 12 nautical miles (nm) from the English coast) and inshore waters (within 12 nm from the English coast). The onshore elements of the Transmission Assets are located within the local authority areas of Fylde Council, Blackpool Council, South Ribble Borough Council, Preston City Council and Lancashire County Council.

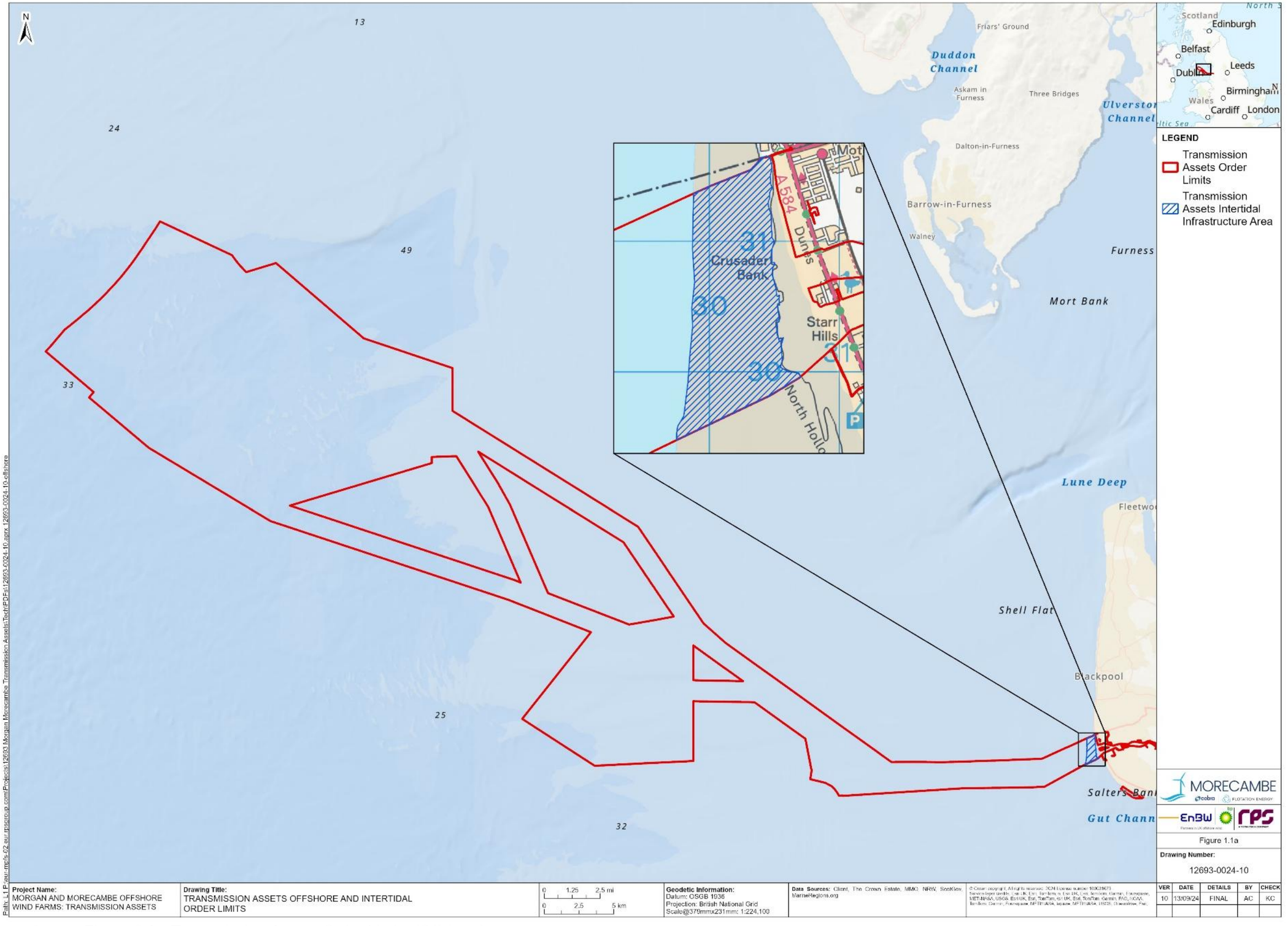
2.1.1.3 Both the Morgan Offshore Wind Project and the Morecambe Offshore Windfarm were scoped into the 'Pathways to 2030' workstream under the Offshore Transmission Network Review (OTNR). The OTNR aims to consider, simplify, and wherever possible facilitate a collaborative approach to offshore wind projects connecting to the National Grid.

2.1.1.4 Under the OTNR, the National Grid Electricity System Operator (NGESO) (which since October 2024 is the publicly owned National Electricity System Operator, or NESO) was responsible for assessing options to improve the coordination of offshore wind generation connections and transmission networks and has undertaken a Holistic Network Design Review (HNDR). In July 2022, the UK Government published the 'Pathway to 2030 Holistic Network Design' documents, which set out the approach to connecting 50 GW of offshore wind to the National Grid (NGESO, 2022). A key output of the HNDR process was the recommendation that the Morgan Offshore Wind Project and the Morecambe Offshore Windfarm should work collaboratively in connecting the two offshore wind farms to the National Grid electricity transmission network at Penwortham in Lancashire.

2.2 Project description

2.2.1.1 This Planning Statement provides a high-level summary of the Transmission Assets. A more detailed description, including an explanation of all onshore and offshore elements of the Transmission Assets, is provided in Volume 1, Chapter 3: Project description of the ES (document reference F1.3).

2.2.1.2 The purpose of the Transmission Assets is to connect the Generation Assets to the National Grid electricity transmission network at Penwortham in Lancashire. The Generation Assets are each subject to separate applications for development consent. Further details are provided in Volume 1, Chapter 2: Policy and legislation context (document reference F1.2). Consent for the Morgan Generation Assets was granted by the Secretary of State on 29 August 2025 and the Morgan Offshore Wind Generation Assets Order 2025 is now in force. The examination phase for the Morecambe Generation Assets has now closed and a decision is expected by the end of 2025.



2.2.1.3 Figure 2.1a: Transmission Assets Order Limits (Offshore)

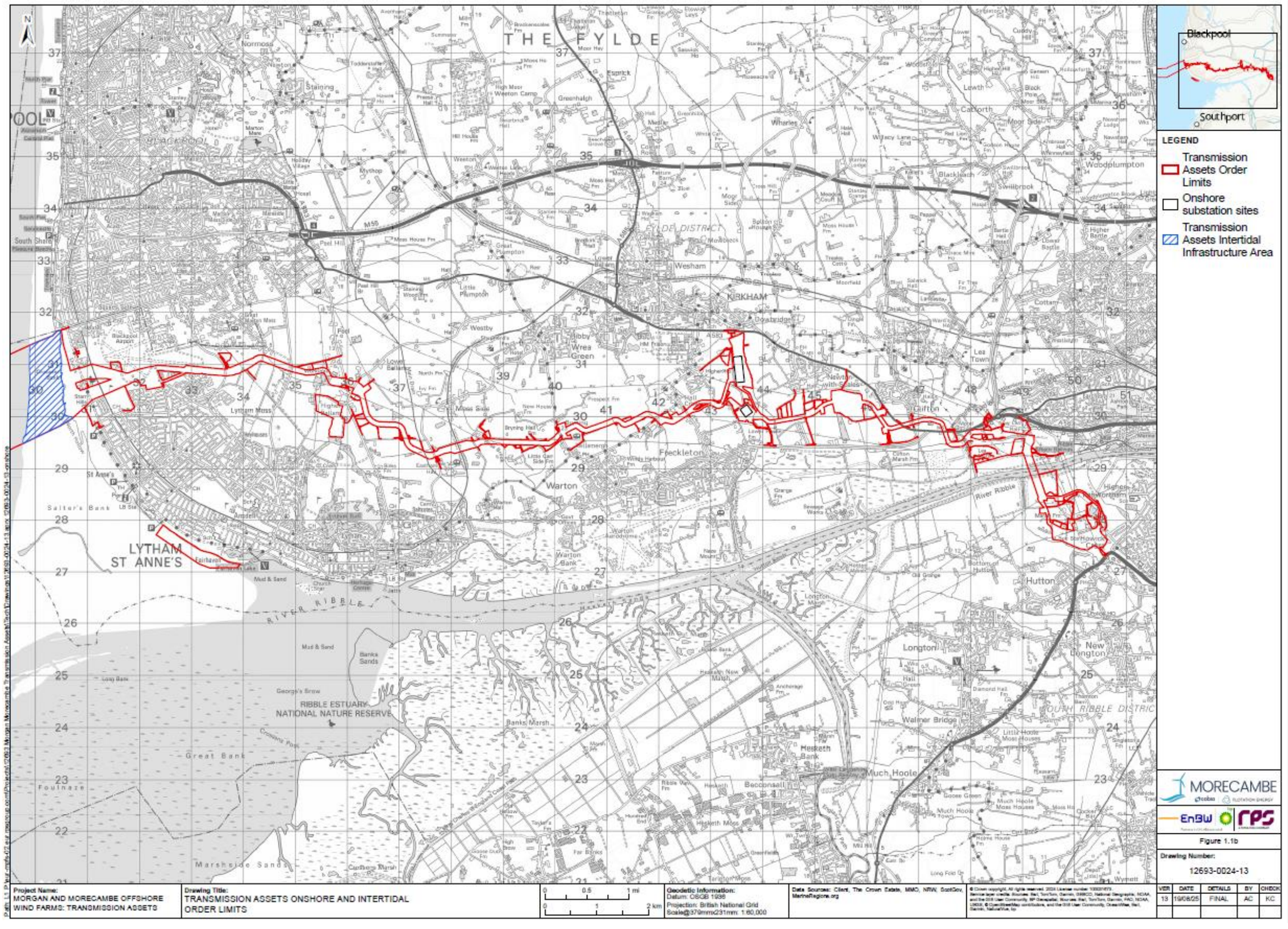


Figure 2.1b: Transmission Assets Order Limits (Onshore)

2.2.1.4 The application for development consent for the Transmission Assets includes the following:

- Morgan Offshore Wind Project: Transmission Assets – the offshore export cables, landfall and onshore infrastructure required to connect the Morgan Offshore Wind Project to the National Grid; and
- Morecambe Offshore Windfarm: Transmission Assets - the offshore export cables, landfall and onshore infrastructure required to connect the Morecambe Offshore Windfarm to the National Grid.

2.2.1.5 The design philosophy is for the transmission infrastructure for each wind farm to remain electrically and commercially independent (i.e., each wind farm to have its own sets of cabling and substation infrastructure). However, the location of the infrastructure will be aligned within offshore and onshore cable corridors to minimise impacts to the environment and the community.

2.2.1.6 The key components of the Transmission Assets include:

- Offshore elements:
  - offshore export cables: these export cables will bring the electricity generated by the Generation Assets to the landfall for onward transmission.
- Landfall:
  - landfall site: this is where the offshore export cables are jointed to the onshore export cables via the transition joint bays. This term applies to the entire area between Mean Low Water Springs and the transition joint bays.
- Onshore elements:
  - onshore export cables: these export cables will be jointed to the offshore export cables via the transition joint bays at the landfall site, and will bring the electricity generated by the Generation Assets to the onshore substations;
  - onshore substations: the two electrically separate onshore substations will contain the components for transforming the power supplied via the onshore export cables up to 400 kV;
  - 400 kV grid connection cables: these export cables will bring the electricity generated by the Generation Assets from the two electrically separate onshore substations to the existing National Grid substation at Penwortham;
  - environmental mitigation areas: temporary and/or permanent areas, including accesses identified to provide environmental mitigation only; and
  - biodiversity benefit areas: temporary and/or permanent areas, including accesses identified to provide biodiversity benefit only.

2.2.1.7 The onshore export cables and the 400 kV grid connection cables will be completely buried underground, and the land reinstated post-construction, for

their entire length. No overhead pylons will be installed as part of the Transmission Assets.

2.2.1.8 In addition to the permanent components outlined in **paragraph 2.2.1.6**, temporary onshore infrastructure would be required for the construction phase, including construction compounds and accesses. Again, any land used temporarily for the construction phase would be reinstated once the relevant works were complete.

2.2.1.9 All of the above elements will be located within the Transmission Assets Order Limits shown on **Figure 2.1.**

3 Legislation, policy and guidance

3.1 Introduction

3.1.1.1 The Secretary of State for the Department for Business, Energy and Industrial Strategy (BEIS) (the department which preceded the Department for Energy Security and Net Zero) has directed that the Transmission Assets are to be treated as development for which development consent is required under the Planning Act 2008, as amended (referred to in this document as 'the Planning Act 2008'), as set out in Volume 1, Chapter 1: Introduction to the ES (document reference F1.1). The direction is provided in document reference J24: Direction by the Secretary of State under section 35 of the Planning Act 2008.

3.1.1.2 This section outlines the legislative and policy framework that is relevant to the Transmission Assets and, in particular, that which should be considered by the Secretary of State when determining this application for development consent under the Planning Act 2008.

3.1.1.3 Policy and legislation specific to individual environmental topics and EIA are set out within each topic chapter of the ES (see Volumes 2, 3 and 4 of the ES: document references F2, F3 and F4).

3.2 International climate change commitments

3.2.1 Overview

3.2.1.1 Climate change and renewable energy policy in the UK is underpinned by international commitments, which are summarised below.

3.2.2 United Nations Framework Convention on Climate Change

3.2.2.1 The United Nations Framework Convention on Climate Change (UNFCCC) is an intergovernmental treaty that came into force on 21 March 1994. Its objective was to achieve:

'Stabilization of greenhouse gas concentrations in the atmosphere at a level that would prevent dangerous anthropogenic interference with the climate system' (Article 2 of the UNFCCC) (United Nations, 1992).

3.2.2.2 To date, the UNFCCC has been ratified by 197 signatories, including the UK. The first agreement was the Kyoto Protocol, which was signed in 1997. A

number of meetings of the UNFCCC have taken place since 1997, resulting in several important and binding agreements, summarised in the following sections.

3.2.3 Kyoto Protocol

3.2.3.1 The UK is a signatory to the Kyoto Protocol, an international agreement for the implementation of the UNFCCC. The Kyoto Protocol commits industrialised countries and economies to limit and reduce greenhouse gas emissions in accordance with agreed individual targets. The UNFCCC asks those countries to adopt policies and measures on mitigation and to report periodically. The protocol came into effect in 2005 and its commitments were transposed into UK law by the Climate Change Act 2008, as amended.

3.2.3.2 The protocol initially placed a duty on the UK to ensure that the net UK carbon account for the year 2050 was 80% lower than the 1990 baseline. Due to increasing awareness of the need for more urgent action, this was revised to a 'net zero target' by the Climate Change Act 2008 (2050 Target Amendment) Order 2019. This revised target was for greenhouse gas emissions to be 100% lower than 1990 levels by the year 2050.

3.2.4 The United Nations Adoption of the Paris Agreement COP21

3.2.4.1 In December 2015, 195 signatories, including the UK, adopted the first universal, legally binding global climate deal at the Paris climate conference, Conference of Parties (COP) 2021 (COP21). The Paris Agreement (United Nations, 2015) seeks to reduce global greenhouse gas emissions and to limit the global temperature increase in this century to 'well below' 2°C, while pursuing the means to limit this further to 1.5°C. This was ratified by the UK Government in November 2016 and is a binding international treaty.

3.2.4.2 The Paris Agreement requires countries to submit a Nationally Determined Contribution (NDC) to the UNFCCC. The UK's NDC (HM Government, 2022) commits the UK to reducing economy-wide greenhouse gas emissions by at least 68% by 2030, compared to 1990 levels.

3.2.5 The Glasgow Pact COP26, COP27, COP28 and COP29

3.2.5.1 At the COP26 summit in November 2021, nearly 200 parties voted to adopt the Glasgow Climate Pact (UNFCCC, 2021). This includes commitments to phase down the use of coal and supports a common timeframe and methodology for national commitments on emissions reductions. Countries were tasked to return in 2022 with more ambitious 2030 emissions reductions targets. The COP27 summit in November 2022 made little further progress on the emissions reduction ambitions discussed at COP26.

3.2.5.2 The COP28 summit, held in November/December 2023, resulted in a decision to accelerate action across all areas by 2030, including a call on governments to transition away from fossil fuels to renewables such as wind and solar power in their next round of climate commitments. The COP29 summit took place in November 2024 and, *inter alia,* launched a new global target for climate finance, which intends for development countries to 'take

the lead' in raising $300bn a year for developing countries by 2035. This replaces an earlier goal of $100bn per year. In addition, facilitation and recording on the international trading of carbon credits were agreed.

3.2.5.3 The COP28 summit also included the first 'global stocktake', which assessed global progress towards the goals of the Paris Agreement. The stocktake concluded that implementation of the Paris Agreement is lacking throughout the world, with a clear gap between individual countries' stated ambitions (through NDCs) and mitigation actions and policies to achieve those goals. The 'stocktakes' are due to occur every five years. COP29 did acknowledge the lack of momentum on the transition from fossil fuels and encouraged countries to set ambitious and investible nationally determined contributions.

3.3 UK climate change and renewable energy commitments

3.3.1 Overview

3.3.1.1 The UK has a range of legislation and policies relating to climate change and renewable energy, a summary of which is provided below.

3.3.2 The Climate Change Act 2008 (as amended)

3.3.2.1 As set out in **section 3.2.3**, the Climate Change Act 2008 originally committed the UK to a net reduction in greenhouse gas emissions of 80% by 2050 against the 1990 baseline in line with the commitments of the Kyoto Protocol.

3.3.2.2 In June 2019, secondary legislation (the Climate Change Act 2008 (2050 Target Amendment) Order 2019) was passed that extended that target to at least 100% against the 1990 baseline.

3.3.2.3 The Climate Change Act 2008 also established the Committee on Climate Change (now the Climate Change Committee), which advises the UK and devolved governments on emissions targets and reports to Parliament on progress made. In May 2011, the Climate Change Committee published the Renewable Energy Review (Climate Change Committee, 2011), which explores the potential for renewable energy development and its role in achieving emissions reduction targets. The Renewable Energy Review states that renewable energy developments will provide a significant contribution to the decarbonisation of the national grid by 2030.

3.3.2.4 The Climate Change Committee has since produced six carbon budgets, covering 2008 to 2037. These carbon budgets represent a limitation on the total quantity of greenhouse gas emissions to be emitted over each five-year period. The sixth carbon budget is the most recent carbon budget to be published, covering 2033 to 2037 (Climate Change Committee, 2020). The budget states that electricity demand is predicted to rise by 50% by 2035 and at least double by 2050, mostly through reduced reliance on high carbon energy sources such as fossil fuels. Therefore, decarbonisation of electricity production is essential. Suggested changes to electricity generation include:

- expansion of low carbon energy supplies, with 100% of electricity production coming from low carbon sources by 2035, mostly from renewables; and
- increasing renewables to 60% of total energy generation by 2030, 70% by 2035 and 80% by 2050, with offshore wind being 'the backbone of the system' (Climate Change Committee, 2020, chapter 3 section 4: Electricity generation).

3.3.2.5 The 7th carbon budget (CB7), released in February 2025, sets a legally binding limit on greenhouse gas emissions for the period 2038-2042; by 2040, UK emissions must be only a quarter to today's levels (an 87% reduction in greenhouse gas emission by 2040 compared to 1990 levels) which aligns with the UK's commitment to reach net-zero by 2050. For the first time, CB7 also included emissions from international aviation and shipping within its targets and projections. Additionally, CB7 projects that electrification (across a number of sectors including transport, heating and industry) and low-carbon electricity supply will account for the largest share of emissions reductions, contributing 60% by 2040.

3.3.3 The Energy Act 2013

3.3.3.1 The Energy Act introduced a legislative framework for delivering secure, affordable and low carbon energy. It included provisions to incentivise investment in low carbon electricity generation, ensure security of supply, and help the UK meet its emission reduction and renewables targets. In particular, the Energy Act 2013 contained provisions for Electricity Market Reform (EMR).

3.3.3.2 EMR was designed to enable the UK to develop a clean, diverse and competitive mix of electricity generation that will ensure we meet targets on decarbonisation and security of supply, while keeping bills as low as possible for consumers now and in the future (BEIS, 2022).

3.3.3.3 EMR comprised two main policy areas to deliver the above:

- capacity market: to ensure security of electricity supply at least cost to the customer; and
- Contracts for Difference (CfDs): to provide long-term revenue stabilisation for new low carbon electricity generation in Great Britain.

3.3.4 The Clean Growth Strategy 2017

3.3.4.1 The Clean Growth Strategy (HM Government, 2017) emphasised the need to grow national income, while cutting greenhouse gas emissions. Its aim to achieve clean growth, while ensuring an affordable energy supply for businesses and consumers, is at the heart of the UK's Industrial Strategy.

3.3.5 National Infrastructure Assessment 2018 and 2023

3.3.5.1 The National Infrastructure Commission (NIC) provides advice on the UK's national infrastructure and an assessment of our infrastructure needs to 2050 and beyond.

3.3.5.2 The first National Infrastructure Assessment was published in 2018 (NIC, 2018), which highlighted the need for the UK to have low cost and low carbon electricity. It proposed a highly renewable generation mix as a low-cost option for the energy system, with at least 50% renewable generation by 2030. It proposed the continued use of mechanisms such as CfDs to achieve this and set out that offshore wind should be recognised as cost competitive.

3.3.5.3 The case for at least 50% renewable generation by 2030 was reaffirmed by the NIC's Net Zero: Opportunities for the power sector paper (NIC, 2020). This paper confirmed that renewables costs have fallen faster than forecast. It states that:

'The government's ambition to deploy 40 GW of offshore wind will go a long way to delivering at least 50 per cent renewable generation by 2030. This positive progress needs to continue. Delivering the Commission's recommendations would allow government to take the needed concrete action in the near term, whilst not closing down options for the future' (NIC, 2020, Recommendations from the National Infrastructure Assessment).

3.3.5.4 As part of the work towards the second National Infrastructure Assessment, a baseline report was published in 2021 (NIC, 2021). This identified the following area for improvement: *'greenhouse gas emissions from economic infrastructure must reduce further, fast'*. It also identified two strategic themes for the second National Infrastructure Assessment relevant to climate change and renewable energy.

- Reaching net zero: all sectors have more to do to reach net zero, including energy, where government has committed to decarbonise electricity generation by 2035.
- Climate resilience and the environment: while economic infrastructure has generally proved resilient to shocks and stresses over recent years, climate change will only increase pressures across all sectors, and infrastructure sectors have significant effects – both positive and negative – on the environment.

3.3.5.5 The second National Infrastructure Assessment was published in October 2023 (NIC, 2023) and provides an assessment of the UK's infrastructure needs to 2055 and beyond. This report recognises that the UK has already made significant progress in boosting renewable electricity generation, but highlights that there is still progress to be made to address three key challenges:

- decarbonising energy and achieving net zero emissions;
- supporting economic growth across all regions; and
- improving climate resilience and the environment.

3.3.5.6 With regards to energy security, the report states that: 'By 2035, the UK needs a reliable electricity system running mostly on renewable power. Government should accelerate the deployment of offshore wind, onshore wind and solar power.'

3.3.6 The UK Offshore Wind Sector Deal 2019

3.3.6.1 The UK Government published the Offshore Wind Sector Deal in 2019, which sets the key commitments and actions from the UK Government to support offshore wind energy development (HM Government, 2020a). Whilst it was of relevance when the Transmission Assets application was in preparation, and it had previously helped to inform direction of travel and decisions relating to the Transmission Assets, this has since been withdrawn on 26 June 2025 as the government published its Modern Industrial Strategy, discussed below.

3.3.7 National Infrastructure Strategy 2020

3.3.7.1 The National Infrastructure Strategy was published in November 2020 and sets out the plan for the UK's infrastructure revolution, alongside the plans for levelling up. It responds to the recommendations made in the National Infrastructure Assessment (HM Treasury, 2020). Commitments include:

- significant investment in offshore wind and into modern ports and manufacturing infrastructure to expand the share of energy generation from renewables; and
- supporting jobs and growth across the UK, particularly in post-industrial and coastal towns.

3.3.7.2 The government's decarbonisation agenda will build the UK's capability in new green industries. Infrastructure investment in offshore wind capacity (40 GW by 2030) and port infrastructure will create jobs in coastal communities.

3.3.8 The Ten Point Plan for a Green Industrial Revolution 2020

3.3.8.1 The UK's Ten Point Plan (HM Government, 2020c) intends to set the foundations for a 'Green Industrial Revolution … creating jobs through harnessing British science and technology to create and use clean energy'. Point one of the Ten Point Plan is 'Advancing Offshore Wind'.

3.3.8.2 The Ten Point Plan notes that offshore wind is a critical source of renewable energy for our growing economy and that by 2030 the Government plans to quadruple our offshore wind capacity, backing new innovations to make the most of this proven technology and investing to bring new jobs and growth to our ports and coastal regions. It confirms the NIC's aim of 40 GW of offshore wind by 2030 and sets out a proposed £160 million investment programme for modern ports and manufacturing infrastructure.

3.3.9 The Energy White Paper: Powering our Net Zero Future 2020

3.3.9.1 Following the Prime Minister's Ten Point Plan (HM Government, 2020c), and National Infrastructure Strategy (HM Treasury, 2020), the Energy White Paper (HM Government, 2020d) marked a significant milestone in the UK's net zero transition, setting a net zero target by 2050 and outlining how this may be achieved. It relates to the generation, supply and use of energy with the drive towards net zero by 2050 at its core, along with energy efficient buildings and lower household bills. It signalled a decisive move away from

fossil fuel generation and highlights how planned Government investment has the potential to leverage billions of pounds in private sector funding and support for over 250,000 jobs in the green economy by 2030.

3.3.9.2 In particular, the introduction of the White Paper set out an aim to quadruple offshore wind capacity by 2030, 'backing new innovations to make the most of this proven technology and investing to bring new jobs and growth to our ports and coastal regions'. It included a target for 40 GW of offshore wind by 2030 (in line with the National Infrastructure Strategy).

3.3.10 Net Zero Strategy: Build Back Greener 2021

3.3.10.1 Building on the Ten Point Plan, the Energy White Paper, and the requirements of the Climate Change Act 2008 (2050 Target Amendment) Order 2019, the Government published its Net Zero Strategy in 2021 (HM Government, 2021a). This sets out the long-term plan to end the UK's contribution to man-made climate change by 2050. The key policies in the net zero strategy include that:

- by 2035 the UK will be powered entirely by clean electricity, subject to security of supply; and
- 40 GW of offshore wind will be delivered by 2030.

3.3.10.2 The strategy proposed that the UK should lead the way in meeting the commitments made at COP26 in Glasgow.

3.3.11 British Energy Security Strategy 2022

3.3.11.1 On 7 April 2022, the UK Government published its British Energy Security Strategy (BEIS and Prime Minister's Office, 2022). The strategy builds on the UK net zero target, placing a heavy reliance on a renewable and low carbon energy supply with a view to *'bring clean, affordable, secure power to the people for generations to come'*.

3.3.11.2 The strategy plans to accelerate delivery of offshore wind by strengthening the renewable NPSs (see **section 3.4.5.3**) to reflect the importance of energy security and net zero. It proposes work with an Offshore Wind Acceleration Task Force to work on reducing the consenting and delivery times for offshore wind projects and fast-tracking priority projects, including the development of an Offshore Wind Environmental Improvement Package. Specifically, the strategy states an ambition to deliver up to 50 GW of offshore wind by 2030, an increase on previous targets of 40 GW.

3.3.12 Great British Energy

3.3.12.1 The Government has confirmed its commitment to renewable energy, including offshore wind. This includes a commitment to future offshore wind projects, including making Britain a clean energy superpower by 2030, as set out in the Great British Energy founding statement (DESNZ, 2024a). UK's Modern Industrial Strategy

3.3.12.2 The Modern Industrial Strategy, published in June 2025 is a 10-year plan to transform business investment, grow the industries of the future in the UK

and delivery economic growth across the UK. It includes plans for 8 high-growth sectors including the Clean Energy Industries Sector Plan which includes an ambition for the UK to be a global leader by 2035 in clean energy, doubling investment levels across clean energy industries to over £30 billion per year and creating jobs across the country. (Department for Business and Trade and DESNZ, 2025).

3.4 Planning legislation and policy

3.4.1 The Planning Act 2008

3.4.1.1 The Planning Act 2008 is the primary legislation that establishes the legal framework for applying for, examining and determining applications for Nationally Significant Infrastructure Projects (NSIPs). The key stages of the consenting process under the Planning Act 2008 as well as other environmental regulations are summarised in Volume 1, Chapter 2: Policy and Legislation context of the ES (document reference F1.2).

3.4.1.2 As set out in Volume 1, Chapter 1: Introduction of the ES (document reference F1.1), the Generation Assets fall within the definition of an NSIP, as each of Morgan and Morecambe's Generation Assets exceed the threshold for an offshore generating station with a capacity of more than 100 MW, set under the Planning Act 2008. These are the subject of separate applications for development consent. These applications were made in April and May 2024 for Morgan Offshore Wind Project: Generation Assets and Morecambe Offshore Windfarm: Generation Assets respectively. Consent for the Morgan Generation Assets was granted by the Secretary of State on 29 August 2025 and the Morgan Offshore Wind Generation Assets Order 2025 is now in force. The examination phase for the Morecambe Generation Assets has now closed and a decision is expected by the end of 2025.

3.4.1.3 As set out in **section 2.1**, a key output of the HNDR process was that Morgan OWL and Morecambe OWL should work collaboratively in connecting the Generation Assets to the National Grid electricity transmission network at Penwortham in Lancashire.

3.4.1.4 The Applicants have worked closely to identify how best to develop (and consent) a co-ordinated but electrically and commercially separate grid connection. This has necessitated an appropriate balance between minimising impacts to local communities through broader co-ordination and co-location of infrastructure, whilst ensuring that the projects can be independently delivered. The output of this process has been to pursue a co-ordinated grid connection whereby both wind farms:

- consent their respective Generation Assets separately (so that they remain commercially and geographically distinct and subject to their individual agreements for lease with The Crown Estate); and
- pursue a joint consent for the Transmission Assets (covering both projects' offshore export cables and onshore transmission infrastructure).

3.4.1.5 Key reasons for selecting this consenting approach are to:

- allow for better consideration and assessment of potential impacts (including beneficial and cumulative impacts);
- facilitate more efficient use of stakeholder resources to minimise stakeholder fatigue or confusion;
- provide a formal structure for the projects to collaborate and align on routing and siting, transmission design, assessment and mitigation approach;
- align with the NPSs for delivering major energy infrastructure (for example paragraphs 4.2.4 and 4.2.5 of NPS EN-1 (DESNZ, 2023a) and sections 2.7 and 2.13 of NPS EN-5 (DESNZ, 2023c); and
- avoid separate complex consenting processes locally and nationally, enabling alignment and timetabling certainty, reducing the potential for delays from the consenting of the necessary Transmission Assets to delay the delivery of two NSIP Generation Assets projects.

3.4.1.6 The application for development consent for the Transmission Assets covers the following key components.

- Offshore:
  - offshore export cables: these export cables will bring the electricity generated by the Generation Assets to the landfall for onward transmission.
- Landfall:
  - landfall site: this is where the offshore export cables are jointed to the onshore export cables via the transition joint bays. This term applies to the entire area between Mean Low Water Springs and the transition joint bays.
- Onshore elements:
  - onshore export cables: these export cables will be jointed to the offshore export cables via the transition joint bays at the landfall site, and will bring the electricity generated by the Generation Assets to the onshore substations;
  - onshore substations: the two electrically separate onshore substations will contain the components for transforming the power supplied via the onshore export cables up to 400 kV; and
  - 400 kV grid connection cables: these export cables will bring the electricity generated by the Generation Assets from the two electrically separate onshore substations to the existing National Grid substation at Penwortham.
  - environmental mitigation areas: temporary and/or permanent areas, including accesses identified to provide environmental mitigation only.
  - biodiversity benefit areas: temporary and/or permanent areas, including accesses identified to provide biodiversity benefit only.

3.4.1.7 Applications for development consent are examined by the Planning Inspectorate and determined by the Secretary of State. Consent takes the form of a Development Consent Order (DCO).

3.4.1.8 In accordance with section 104(2) of the Planning Act 2008, in determining applications for consent, the Secretary of State may have regard to:

- any national policy statement (NPS) which has effect in relation to development of the description to which the application relates;
- the appropriate marine policy documents;
- any local impact report;
- any matters prescribed in relation to development of the description to which the application relates; and
- any other matters which the Secretary of State thinks are both important and relevant to its decision.

3.4.1.9 Section 104(3) highlights the importance of NPSs in relation to decision making, requiring applications to be decided in accordance with any relevant NPS, except where any of the following apply:

- the decision would lead to breaching of international obligations (section 104(4) or statutory duty (section 104(5));
- the decision would be unlawful by virtue of any enactment (section 104(6);
- the adverse impact of the development is considered to outweigh its benefits; or
- a condition prescribed for deciding an application otherwise than in accordance with a national policy statement would be met.

3.4.1.10 Section 104 of the Planning Act 2008 applies in relation to an application for an order granting development consent if a national policy statement has effect in relation to development of the description to which the application relates (section 104(1)). In this case NPS EN-1 prescribes that '*EN-1, in conjunction with any relevant technology specific NPS, will be the primary policy for Secretary of State decision making on projects in the field of energy for which a direction has been given under section 35.*' The Transmission Assets are a project in the field of energy for which a direction has been given under section 35 and, given that EN-1 prescribes that it (in conjunction with the relevant technology specific NPSs, in this case EN-3 (as appropriate) and EN-5) is the primary policy for such projects, there is a national policy statement which has effect in relation to the Transmission Assets.

3.4.1.11 It is noted that the section 35 direction issued for the Transmission Assets does not explicitly state that the DCO should be determined under section 104 or section 105 of the Planning Act 2008. The Applicants do not consider that s105 would apply, given the clear wording of NPS EN-1.

3.4.1.12 Therefore, the Applicants are of the position that, the application should be determined under section 104 of the Planning Act 2008, and consequently

NPS EN-1, EN-3 (as appropriate) and EN-5 are the primary policy documents for decision-making.

3.4.1.13 The NSIP consenting process was updated in 2024 and included a number of key changes which aimed at improving the efficiency and effectiveness of the process. This included cost recovery for local authorities, a new three-tier application service and the requirement to submit additional documents including, *inter alia*, a Programme Document, an Advice Log and Adequacy of Consultation Milestone.

3.4.1.14 Also in April 2024, a new National Infrastructure Planning Guidance Portal was introduced providing access to and updates on the status of existing and newly published National Infrastructure Planning Guidance. This included an overarching introduction to National Infrastructure Planning Guidance (April 2024) and an updated guidance document setting out the requirements and expectations in the preparation of an application for development consent during the pre-application stage; The Planning Act 2008: Pre-application stage for Nationally Significant Infrastructure Projects (2024). This 2024 guidance was published on the 30 April 2024 and resulted in the withdrawal of the DCLG 2015 guidance.

3.4.1.15 The Transmission Assets was well advanced in its pre-application stage at the time these changes came into force and had already completed its statutory consultation. As detailed at Paragraph 006 (Reference ID 01-006-20240417) of the Introduction to National Infrastructure Planning Guidance, *"There may be occasions when guidance is revised when applicants have already commenced their statutory pre-application consultation or after an NSIP application has been submitted for acceptance or is in pre-examination or examination. It is not the intention for revisions to guidance to compromise the preparation or progress of applications which are already well under way."* Since the statutory consultation for the Transmission Assets had already been undertaken prior to the publication of the 2024 Guidance, the Applicants proceed with the application for the Transmission Assets DCO on the basis of the DCLG 2015 guidance.

3.4.2 Planning and Infrastructure Bill 2025

3.4.2.1 On 11 March 2025, the Planning and Infrastructure Bill was introduced to Parliament seeking to, *inter alia*, bolster energy security with cheaper, clean homegrown power and with an aim for key infrastructure to be built faster with a target of 150 major infrastructure projects to be determined by the end of the current Parliament. The Bill has been subject to a number of updates since its publication. At the time of writing (October 2025) the Bill is currently at the Report Stage in the House of Lords. Whilst the Bill will principally amend the Planning Act 2008, due to the timing of the Bill and the stage of Transmission Assets in Examination, it is not considered that the Bill will have a material impact upon Transmission Assets.

3.4.2.2 Furthermore, there is no current statutory requirement for NSIPs, or those direction into the NSIP regime via a section 35 direction, to deliver Biodiversity Net Gain (BNG). However, a consultation on the implementation of BNG for NSIPs was held between May and July 2025. It is currently

anticipated that BNG for NSIPs will be introduced from May 2026. Consequently, there is no current mandatory requirement to deliver BNG however the Transmission Assets have taken a voluntary approach to biodiversity benefit, which reflects emerging best practice and should therefore be given weight in the Secretary of State's decision making.

3.4.3 Powering Up Britain: The Net Zero Growth Plan 2023

3.4.3.1 Due to a successful legal challenge on the 2021 Net Zero Strategy (HM Government, 2021a), the UK Government published an updated strategy in March 2023, titled 'the Net Zero Growth Plan' (HM Government, 2023a). This plan largely restated existing policy contained within previous policy papers above. The plan confirmed the UK's commitment to having a decarbonised power system by 2035, with the majority of power generated from renewable sources such as wind and solar. It targets an increase to 50 GW of offshore wind capacity by 2030.

3.4.4 The Marine and Coastal Access Act 2009

3.4.4.1 Parts 3 and 4 of the Marine and Coastal Access Act 2009 contain a requirement to obtain a marine licence for certain activities and works at sea.

3.4.4.2 Section 149A of the Planning Act 2008 allows applicants for development consent to apply for 'deemed marine licences' as part of the consenting process. The Marine Management Organisation (MMO) are the responsible authority for deemed marine licences in English waters and work with the Planning Inspectorate to ensure that deemed marine licences are transposed into the DCO. The MMO remain the regulatory compliance monitoring and enforcement body in respect of the conditions contained within the deemed marine licences.

3.4.4.3 Part 5 of the Marine and Coastal Access Act 2009 enables the designation of Marine Conservation Zones (MCZs) in England and Wales as well as UK offshore areas. Consideration of MCZs is required for any marine licence application or application for development consent within an MCZ which includes a deemed marine licence. A Marine Conservation Zone Assessment (document reference E4) accompanies the DCO application.

3.4.5 Clean Power 2030 Action Plan

3.4.5.1 The Clean Power 2030 Action Plan was published by DESNZ in December 2024 and sets out a pathway to a clean power system by 2030 (DESNZ, 2024c).

3.4.5.2 Its primary aim is for the UK to achieve clean power by 2030 and to increase energy security and improve affordability, whilst reducing greenhouse gas emissions. Within it, the Government has committed to a wide range of measures, including reformed electricity networks and connections, updated planning and consents, commitment to renewable and nuclear project delivery, reforms to the electricity market, measures to support and encourage short and long duration energy storage flexibility and measures to

support key supply chains and workforce. Other measures included in the Action Plan are discussed in section 3.4.5.3 below.

3.4.5.3 Overall, the Action Plan provides greater support for large-scale renewable projects and their associated infrastructure.

3.4.6 Planning for new energy infrastructure:

National Policy Statements

3.4.6.1 There are currently six energy NPSs, three of which contain policy relevant to offshore wind development and the Transmission Assets, specifically:

- Overarching NPS for Energy (NPS EN-1) which sets out the UK Government's policy for the delivery of major energy infrastructure (DESNZ, 2023a);
- NPS for Renewable Energy Infrastructure (NPS EN-3) (DESNZ, 2023b); and
- NPS for Electricity Networks Infrastructure (NPS EN-5) (DESNZ, 2023c).

3.4.6.2 The NPSs describe the national need case and establish the need for certain types of infrastructure development including energy, as well as identifying key issues that should be considered by the Examining Authority and the Secretary of State when examining and determining an application for development consent under the Planning Act 2008.

3.4.6.3 The key requirement from section 104 of the Planning Act 2008 is to assess, on balance, whether the application is in accordance with the relevant NPSs and whether any specified exceptions apply. This may include considering whether the policies set out in the NPSs for delivery of renewable energy are outweighed by any adverse impacts that have been identified, noting the presumption is in favour of applications which accord with any relevant NPSs, in particular those projects for which a Critical National Priority (CNP) has been established.

3.4.6.4 As explained in paragraphs **3.4.1.10** and **3.4.1.12**, the Applicants are of the view that the application should be determined under section 104 of the Planning Act 2008; NPS EN-1, EN-3 (as appropriate) and EN-5 are therefore the primary policy documents for decision-making, and the assessment presented in this Planning Statement is made on this basis.

3.4.6.5 An NPS tracker (document reference J26) is submitted with this application and provides a detailed analysis of how the Transmission Assets application accords with the relevant NPSs. This has been updated at Deadline 7 to reflect the position at the close of Examination.

Overarching National Policy Statement for Energy (EN-1)

3.4.6.6 This is the overarching energy NPS, setting out the broad basis for considering applications for development consent. It sets out the Government's policy for the delivery of major energy infrastructure.

3.4.6.7 Of relevance to the Transmission Assets, paragraph 3.2.6 of NPS EN-1 states that *'The Secretary of State should assess all applications for development consent for the types of infrastructure covered by this NPS on the basis that the government has demonstrated that there is a need for those types of infrastructure which is urgent, as described for each of them in this Part'*, with substantial weight given to this need when considering applications for development consent under the Planning Act 2008.

3.4.6.8 In addition, the Secretary of State is not required to consider separately the specific contribution of any individual project to satisfying the need established in this NPS (paragraph 3.2.8).

3.4.6.9 For proposals requiring development consent under section 35 of the Planning Act 2008, as is the case for the Transmission Assets, paragraph 3.2.12 establishes that:

'In these circumstances any application for development consent would need to be considered in accordance with this NPS.

In particular:

…

• *where the application is for electricity network infrastructure not covered by sections 15-21 of the Planning Act, including underground or offshore infrastructure, the Secretary of State should give substantial weight to the need established at paragraphs 3.4.1 to 3.4.9 of this NPS…'*

3.4.6.10 Paragraph 3.3.3 stresses the importance of ensuring that there is sufficient electricity to meet demand and that new electricity infrastructure will have to be built to replace output from retiring plants and to ensure we can meet increased demand. Paragraph 3.2.8 confirms that, when determining applications for national infrastructure, the Secretary of State is '*not required to consider separately the specific contribution of any individual project to satisfying the need established in this NPS*.'

3.4.6.11 Whilst there is a general presumption in favour of consenting renewable energy projects based on the Government's assessment of the need for electricity generating capacity as set out in paragraphs 3.3.57 to 3.3.63, the NPS includes a strengthened presumption specifically in favour of CNP infrastructure.

3.4.6.12 Paragraphs 3.3.62 and 4.2.4 of NPS EN-1 confirm that the '*Government has concluded that there is a critical national priority (CNP) for the provision of nationally significant low carbon infrastructure*.'

3.4.6.13 Section 4.2 of NPS EN-1 sets out which energy generating technologies are identified as low carbon and are therefore CNP infrastructure. Paragraph 4.2.5 of NPS EN-1 states that for electricity generation CNP infrastructure includes '… *all onshore and offshore generation that does not involve fossil fuel combustion*….' and for electricity grid infrastructure it includes '*all power lines in scope of EN-5 including network reinforcement and upgrade works, and associated infrastructure such as substations'.* The same paragraph clarifies that the definition as CNP infrastructure also applies to '… *energy infrastructure which is directed into the NSIP regime under section 35 of the Planning Act 2008, and fit within the normal definition of "low carbon", such*

as interconnectors, Multi-Purpose Interconnectors, or 'bootstraps' to support the onshore network which are routed offshore.' The Transmission Assets are of the type considered to be CNP infrastructure in EN-1 as they have been directed into the NSIP regime by a section 35 direction (which expressly confirms that '*the Secretary of State is of the view that the proposed project (is nationally significant'*) and an essential part of a 'low carbon' infrastructure project. As these are the type of works that are covered by NPS EN-1 paragraph 4.2.5, the Applicants consider that the Transmission Assets benefit from the policy support provided to CNP infrastructure.

3.4.6.14 The strengthened presumptions in favour of CNP infrastructure include that even '*where residual non-HRA or non-MCZ impacts remain after the mitigation hierarchy has been applied, these residual impacts are unlikely to outweigh the urgent need for this type of infrastructure'* (paragraph 4.2.15, NPS EN-1). The paragraph then goes on to confirm '…*in all but the most exceptional circumstances, it is unlikely that consent will be refused on the basis of these residual impacts*.'

3.4.6.15 Paragraph 4.2.16 of NPS EN-1 then confirms that the starting point for decision making by the Secretary of State 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. This includes development within Green Belt, development affecting Sites of Special Scientific Interest (SSSIs), development in nationally designated landscapes and where there is substantial harm to or loss of significance to heritage assets (paragraph 4.2.17) if the applicant demonstrates that the mitigation hierarchy, requirements of EN-1 and the relevant technology specific NPS have been applied, as well as any other legal and regulatory requirements.

3.4.6.16 Similarly, in terms of any HRA or MCZ residual impacts, paragraphs 4.2.18 to 4.2.22 of NPS EN-1 confirm that the starting point is that energy security and decarbonising the power sector to combat climate change are capable of amounting to imperative reasons of overriding public interest with the benefit to the public being capable of outweighing the risk of environmental damage. These paragraphs also confirm that the fact there are other potential projects deliverable in different locations to meet the need for CNP infrastructure is unlikely to be treated as an alternative solution. If there are no alternative solutions, then compensatory measures must be secured.

3.4.6.17 NPS EN-1 imposes no limit on the number of CNP infrastructure projects that can be consented (paragraph 4.2.21).

3.4.6.18 In terms of the requirements for infrastructure of a type to be considered CNP, paragraphs 4.2.10 to 4.2.12 confirm that applicants must continue to show how their application meets the requirements of the NPSs applying the mitigation hierarchy, as well as any other legal and regulatory requirements, that they should also seek the advice of the appropriate statutory nature conservation bodies (SNCB) or other relevant statutory body and demonstrate that all residual impacts are those that cannot be avoided, reduced or mitigated, setting out how any mitigation or compensatory measures will be monitored and reporting agreed to ensure success.

3.4.6.19 The exceptions to this presumption of consent are set out in NPS EN-1 paragraph 4.1.7. Whilst this paragraph reiterates that the need case will outweigh the residual effects in all but the most exceptional cases, it also states that those exceptions include residual impacts onshore and offshore which present an unacceptable risk to, or unacceptable interference with, human health and public safety, defence, irreplaceable habitats or unacceptable risk to the achievement of net zero and to unacceptable interference offshore to navigation, or onshore to flood and coastal erosion risk.

3.4.6.20 None of the above exceptions apply to the Transmission Assets which means that, as infrastructure of a type to be considered CNP, the Transmission Assets benefit from the presumption that the need outweighs any residual impacts.

3.4.6.21 In conclusion, therefore, NPS EN-1 confirms that '*Government strongly supports the delivery of CNP Infrastructure…'* and that '…*it should be progressed as quickly as possible*' (paragraph 3.3.63).

3.4.6.22 There is therefore a strong presumption in favour of consenting the Transmission Assets in accordance with NPS EN-1 as CNP Infrastructure (even in the absence of the application of the strengthened presumption).

3.4.6.23 Of note, an NPS tracker (document reference J26) is submitted with this application and provides a detailed analysis of how the Transmission Assets application accords with the relevant NPSs.

National Policy Statement for Renewable Energy Infrastructure (EN-3)

3.4.6.24 NPS EN-3 is the NPS for renewable energy infrastructure and sets out assessment principles in relation to the consideration of renewable projects.

3.4.6.25 The Transmission Assets, as mentioned in **section 2** and further explained in **section 5.25** would allow the connection to the National Grid of two offshore wind farms which are renewable energy projects. In this context, the Applicants consider that the Transmission Assets, on their own but also in connection with these two offshore wind farms, constitute a renewable energy infrastructure project for which NPS EN-3 applies.

3.4.6.26 Section 2 of NPS EN-3 contains the matters that need to be considered by applicants and the Secretary of State in the general assessment of energy infrastructure, as well as technology specific information. Of relevance to the Transmission Assets are:

- the relationship with English renewables policies;
- the factors influencing site selection and design;
- climate change adaptation;
- consideration of good design for energy infrastructure;
- flexibility in the project details; and
- offshore wind.

3.4.6.27 NPS EN-3 outlines that offshore wind development and the supporting onshore and offshore transmission infrastructure are viewed by the Government as being CNP infrastructure and should be progressed as quickly as possible.

3.4.6.28 Paragraph 2.1.8 states that '*Applicants must show how any likely significant negative effects would be avoided, reduced, mitigated and compensated for, following the mitigation hierarchy*.'

3.4.6.29 Paragraph 2.8.37 states that '*Co-ordinated transmission proposals have principally been developed through, and as a consequence of, a process of ongoing reform including through strategic network planning, such as the Holistic Network Design for onshore-offshore transmission, as outlined in EN-5*.'

3.4.6.30 The impacts arising from the development of energy infrastructure are identified in Part 5 of NPS EN-1, and paragraphs 2.8.95 to 2.8.212 of NPS EN-3 and are not intended to be exhaustive.

3.4.6.31 When considering the impacts of energy infrastructure, paragraph 2.11.46 states that '*Applicants must always employ the mitigation hierarchy, in particular to avoid as far as is possible the need to find compensatory measures for coastal, inshore and offshore developments affecting designated sites'*.

3.4.6.32 Mitigation referred to in paragraph 2.8.214 of NPS EN-3 requires that '*At the earliest possible stage, alternative ways of working and use of technology should be employed to avoid environmental impacts. For example, construction vessels may be rerouted to avoid disturbing seabirds. Where impacts cannot be avoided, measures to reduce and mitigate impacts should be employed, for example using trenching techniques or noise abatement technology'*.

3.4.6.33 Further, paragraph 2.8.55 of NPS EN-3 states that '*Only once all feasible alternatives and mitigation measures have been employed, should applicants explore possible compensatory measures to make good any remaining significant adverse effects to site integrity*'.

3.4.6.34 Detailed assessment of compliance with relevant NPS paragraphs is presented in the submitted NPS tracker (document reference J26).

National Policy Statement for Electricity Networks Infrastructure (EN-5)

3.4.6.35 NPS EN-5 is the NPS that provides details of policy for electricity networks (including grid connections for wind farms) and sets out assessment principles in relation to the consideration of applications relating to electricity networks. In terms of offshore wind, this relates to substations, converter stations and other kinds of electricity infrastructure such as underground and subsea cables.

3.4.6.36 Section 2 of the NPS contains the matters that need to be considered by applicants and the Secretary of State in the general assessment of energy infrastructure, as well as technology specific information. These include:

- the factors influencing site selection and design:

- climate change adaptation and resilience;
- consideration of good design for energy infrastructure;
- environmental and biodiversity net gain;
- land rights and land interests;
- holistic planning; and
- strategic network planning.

3.4.6.37 Section 2.12 of NPS EN-5 relates entirely to the special assessment principles for offshore-onshore transmission. Paragraph 2.12.2 states that '*the scale of offshore transmission infrastructure required to support the government's 50GW offshore wind development ambition has significant implications for the onshore network'*. Paragraph 2.12.4 states that '*it is important that the network planning for offshore transmission is much more closely co-ordinated with the planning and development of the onshore transmission network than previously. This includes all types of offshore transmission including interconnectors, multi-purpose interconnectors (MPI) and subsea 'onshore' transmission or 'bootstraps' reinforcing the onshore transmission network*.'

3.4.6.38 Paragraph 2.12.7 of NPS EN-5 relates to CNP infrastructure and reiterates the explanation in NPS EN-1 that electricity grid infrastructure comprises CNP infrastructure. This includes grid connections for nationally significant low carbon infrastructure but the paragraph also notes that any new grid project will contribute towards '*greater efficiency in constructing, operating and connecting low carbon infrastructure to the National Electricity Transmission System. This includes infrastructure identified in the Holistic Network Design and subsequent strategic network design exercises*…'.

3.4.6.39 In preparing applications for offshore-onshore transmission, section 2.13 of NPS EN-5 outlines that there should be consideration of strategic network design (including the outcomes of the HNDR) and that a coordinated approach to design should be adopted. Radial offshore transmission options to single windfarms should only be proposed where options assessment work identifies that a co-ordinated solution is not feasible. As set out in **section 1.2**, Morgan OWL and Morecambe OWL are working collaboratively to deliver the consent required for the Transmission Assets, which will provide a coordinated connection of two offshore wind farms to the National Grid, therefore this section of NPS EN-5 is relevant to the Transmission Assets and more detail and justification is provided on **section 4** and **section 6** of this Planning Statement.

3.4.6.40 In terms of the point of interconnection, NPS EN-5 (paragraph 2.2.1) highlights that the Secretary of State should '*bear in mind that the initiating and terminating points – or development zone - of new electricity networks infrastructure is not substantially within the control of the applicant'* and paragraph 2.2.2 recognises that siting is determined by both the '*location of new generating stations or other infrastructure requiring connection to the network*' and '*system capacity and resilience requirements determined by the Electricity System Operator*.'

3.4.6.41 An assessment of compliance with the relevant paragraph of this NPS is included in the submitted NPS tracker (document reference J26).

3.4.6.42 As detailed in the Planning Statement Addendum submitted for Deadline 2 (document reference S_D2_9), between 24 April and 29 May 2025, the Department for Energy Security and Net Zero (DESNZ) published a consultation on revisions to NPS EN-1, NPS EN-3 and NPS EN-5 which aimed to strengthen the Government's commitment to deliver more renewable energy infrastructure across England and Wales.

3.4.6.43 The draft NPSs are not yet in force, and will be subject to Transitional Arrangements; Section 1.6 of the draft NPS EN-1 states:

3.4.6.44 "While the review is undertaken, the current suite of energy NPS remain relevant government policy and EN-1 to EN-5 have effect for the purposes of the Planning Act 2008. The Secretary of State has decided that for any application accepted for examination before amending the energy NPSs, the current suite of energy NPS, published in 2024, should have effect. … However, any emerging draft energy NPSs (or those amended but not having effect) are potentially capable of being important and relevant considerations in the decision-making process. The extent to which they are relevant is a matter for the relevant Secretary of State to consider within the framework of the Planning Act 2008 and with regard to the specific circumstances of each development consent order application."

3.4.6.45 It is clear, therefore, that the January 2024 NPSs remain the relevant government policy in regard to the determination of the Transmission Assets. It is noted, however, that the draft NPSs may be a material consideration and are therefore an important suite of documents for the ExA to be aware of.

3.4.6.46 In broad terms, and in specific relation to Transmission Assets, the proposed amendments to NPS EN-1 introduce the Clean Power 2030 Action Plan (DESNZ, 2024c) into policy. The Clean Power 2030 Action Plan proposes for at least 95% of the UK's energy generation to come from clean energy sources by 2030. It establishes 'Clean Power Capacity Ranges' which DESNZ has set at 43-50 GW for offshore wind, against a backdrop of 30.7 GW either installed, committed or under construction.

3.4.6.47 Draft NPS EN-1 (DESNZ, 2025a) also considers a range of paths in order to meet the ambitions of the Clean Power 2030 Action Plan, including the mass deployment of offshore wind and its associated transmission infrastructure, at an accelerated pace.

3.4.6.48 In regard to draft NPS EN-3 (DESNZ, 2025b), a number of amendments have been proposed in relation to offshore wind arrays and wake effects, however these are not of relevance to the Transmission Assets.

3.4.6.49 Draft NPS EN-5 (DESNZ, 2025c) introduces the Electricity Transmission Design Principles which will be developed by NESO and will be applicable to onshore and offshore electricity transmission infrastructure, with the purpose of providing greater clarity in the type of asset to be used within different environments, how the impact of transmission infrastructure can be mitigated and proposes to set out how the level of flexibility of route and technology design. Once published, applicants will be required to have regard to the

Electricity Transmission Design Principles, alongside National Grid's Holford and Horlock Rules – the Applicants would note that they have had regard to these in any event, in relation to the Transmission Assets.

3.4.6.50 Furthermore, the proposed amendments to NPS EN-5 also endorses the Centralised Strategic Network Plan. Delivered by NESO, the Centralised Strategic Network Plan builds upon the Pathway to 2030 Holistic Network Design for offshore wind and Beyond 2030 reports, will provide an independent, long-term approach to 2050 on how the transmission network should develop, to meet energy security and decarbonisation goals. It is intended to help reduce the overall impact of infrastructure by taking a coordinated view of the onshore and offshore network, with the first plan is due to be delivered in 2027. The Transmission Assets did form part of the Holistic Network Design Review, a key output of which was the recommendation that the Morgan Offshore Wind Project and the Morecambe Offshore Windfarm should work collaboratively.

3.4.6.51 The amendments to the draft NPSs, as detailed above, provide greater policy support for the Transmission Assets, in light of the Clean Power 2030 Action Plan and the ambitious policy of achieving the majority of the UK's energy generation to come from clean energy sources by 2030. Whilst the amendments in draft NPS EN-5 in relation to the Electricity Transmission Design Principles and Centralised Strategic Network Plan are welcomed, these would not be applicable to Transmission Assets due to the timing of their publications and the stage of Transmission Assets. At the time of writing (August 2025), there have been no further updates on the draft NPSs since the close of consultation in May 2025.

3.4.6.52 A separate policy tracker for the draft NPSs has not been created or submitted for the Examination of Transmission Assets.

3.4.7 Marine policy

UK Marine Policy Statement

3.4.7.1 Section 59 of the Marine and Coastal Access Act 2009 establishes the appropriate marine policy documents for the assessment of development proposals. For the Transmission Assets, the UK-wide Marine Policy Statement (MPS) (Defra, 2011) is the framework for preparing marine plans and taking decisions affecting the marine environment for the purposes of section 104 of the Planning Act 2008. The Marine and Coastal Access Act 2009 requires that all public authorities taking decisions regarding the marine area should do so in accordance with the MPS, unless relevant considerations indicate otherwise.

3.4.7.2 The MPS provides that the following issues should be taken into account by decision makers when examining and determining applications for energy infrastructure:

- '*The national level of need for energy infrastructure, as set out in NPS EN-1…*

- *The positive wider environmental, societal and economic benefits of low carbon electricity generation and carbon capture and storage as key technologies for reducing carbon dioxide emissions.*
- *The potential impact of inward investment in offshore wind, wave, tidal stream and tidal range energy related manufacturing and deployment activity; as well as the impact of associated employment opportunities on the regeneration of local and national economies. All of these activities support the objective of developing the UK's low carbon manufacturing capability'* (MPS, paragraph 3.3.4).

3.4.7.3 The MPS does acknowledge that renewable energy developments can potentially have adverse impacts on fish, mammals and birds and that further research is required to better understand potential impacts, however it goes on to state that:

'The UK has some of the best wind resources in the world and offshore wind will play an important and growing part in meeting our renewable energy and carbon emission targets and improving energy security by 2020, and afterwards towards 2050' (MPS, paragraph 3.3.19).

3.4.7.4 In addition, the MPS states that offshore wind:

'… has the potential to have the biggest impact in the medium-term on security of energy supply and carbon emission reductions through its commercial scale output' (MPS, paragraph 3.3.19).

3.4.7.5 Relevant policies of the UK Marine Policy Statement 2011 for the Transmission Assets are included and addressed in each of the relevant topic chapters of Volume 2 of the submitted ES (document reference F2) and an assessment of compliance with these is presented within Appendix 2 of this Planning Statement (document reference J28.2).

North West Inshore and North West Offshore Marine Plans 2021

3.4.7.6 The Transmission Assets are located within English offshore and inshore waters, covered by the North West Inshore and North West Offshore Marine Plan (HM Government, 2021b). This introduces a strategic approach to marine planning within the marine plan area. It is intended to inform decision-making by marine users and regulators on where, when or how activities may take place within the marine plan area.

3.4.7.7 The North West Inshore and North West Offshore Marine Plan sets out the following four objectives in relation to achieving a sustainable marine economy.

- Infrastructure is in place to support and promote safe, profitable and efficient marine businesses.
- The marine environment and its resources are used to maximise sustainable activity, prosperity and opportunities for all, now and in the future.
- Marine businesses are taking long-term strategic decisions and managing risks effectively. They are competitive and operating efficiently.

- Marine businesses are acting in a way which respects environmental limits and is socially responsible. This is rewarded in the market place. (North West Inshore and North West Offshore Marine Plan, paragraph 31, Table 1).

3.4.7.8 Relevant policies for the Transmission Assets are included and addressed in each of the relevant topic chapters in Volume 2 of the submitted ES (document reference F2) and an assessment of compliance with these is presented within **section 5** of this Planning Statement, alongside Appendix 2 of this Planning Statement (document reference J28.2).

3.4.7.9 The Applicants confirm that there have been no updates to the relevant marine planning policies since the submission of the Transmission Assets; subsequently the Marine Policy Tracker has not been updated for Deadline 7 (document reference J28.2).

3.4.8 National Planning Policy Framework

3.4.8.1 The National Planning Policy Framework (NPPF) (Ministry of Housing, Communities and Local Government, 2023) sets out the Government's planning policies for England and how these are to be applied. It was initially published in 2012 and has been updated several times, most recently in December 2024 after the submission and acceptance of the Transmission Assets for Examination. These revisions became effective immediately.

3.4.8.2 The Applicants have previously acknowledged in the Issue Specific Hearings that the NPPF updates are not material, especially given the NPSs are the primary policy for the determination of the Transmission Assets (see paragraph (4) of REP1-034).

3.4.8.3 Nevertheless, a broad update was provided in the Planning Statement Addendum (S_D2_9) which has been included here. Furthermore, the NPPF Policy Tracker (document reference J28.1 F02) has been updated to now reflect the latest NPPF.

3.4.8.4 Paragraph 5 states that 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. However, consideration is also required for any other matters that are relevant, as set out in section 104(2) of the Planning Act 2008 (see **paragraph 3.4.1.8**) which may include the NPPF.

3.4.8.5 In this regard, Paragraph 8 sets the objective for developments to contribute to the achievement of sustainable development with Paragraph 11 setting a presumption in favour of sustainable development.

3.4.8.6 Of relevance to the Transmission Assets, Chapter 13 of the NPPF relates to the Green Belt. The proposed onshore substations and sections of the onshore export cable corridor would be located within the Warton to Kirkham Green Belt, and the 400 kV grid connection cable corridor would be located within the South Ribble Green Belt. Paragraph 153 of the NPPF establishes that *'inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances'*. Paragraph 160 identifies that when located in the Green Belt *'elements of*

many renewable energy projects will comprise inappropriate development' which would require a demonstration of very special circumstances which *'may include the wider environmental benefits associated with increased production of energy from renewable sources'* (Paragraph 160 of the NPPF). As such, an assessment to demonstrate very special circumstances is contained in **section 5.24** of this Planning Statement.

3.4.8.7 Other relevant matters such as transport, flooding, climate change, natural and historic built environment are also covered by the NPPF, and a detailed assessment of these relevant paragraphs is contained within the relevant ES topic chapters, **section 5** of this Planning Statement and Appendix 1 of this Planning Statement (document reference J28.1).

Main NPPF updates post submission

3.4.8.8 In relation to the Transmission Assets, the main updates to the NPPF appertain to Section 13, Protecting Green Belt land. The revisions saw the introduction of the Golden Rules and the Grey Belt. The PPG on Green Belt was also subsequently updated in February 2025 to reflect these revisions. The Green Belt Technical Note (S_D3_12 F02) provides a thorough assessment, the conclusions of which are provided in section 5.24 of this report.

3.4.8.9 In addition, the NPPF also introduced Paragraph 163, which confirms that *"the need to mitigate and adapt to climate change should be considered in preparing and assessing planning applications, taking into account the full range of potential climate change impacts."* The NPPF was also updated to incorporate support within the planning system for the transition to net zero (former Paragraph 155 (NPPF, 2023), now Paragraph 161 (NPPF, 2024). Paragraph 168 (NPPF, 2024) now requires that when determining renewable and low carbon energy developments, *"significant weight to the benefits associated with renewable and low carbon energy generation, and the proposals contribution to a net zero future"* (Paragraph 168, NPPF, 2024). The NPPF has provided further, reinforcing support for development that supports the transition to net zero and the drive to mitigate and adapt to the effect of climate change.

3.4.8.10 Other updates to the NPPF in 2024 include:

- Sustainable Transport – Former Paragraph 108 (NPPF, 2023) now Paragraph 109 (NPPF, 2024) seeks for transport consideration to form part of early engagement with local communities. In regard to Transmission Assets, details regarding potential highways impacts were produced as part of non-statutory and statutory consultation. The Consultation Report (APP-170) provides further details.
- Climate Change and Community Health – Former Paragraph 153 (NPPF, 2023) now Paragraph 162 (NPPF, 2024) has included the requirement for policies to support appropriate measures to ensure the future health of communities, in relation to infrastructure to climate changes impacts. The impact of Human Health in relation to the Transmission Assets has been considered at Volume 1, Annex 5.1: Human Health (APP-035).

- Flood Risk – Former Paragraph 175 (NPPF, 2023), now Paragraph 182 (NPPF, 2024) has introduced additional wording regarding improvements to water quality and biodiversity, and seeks for all development which could affect drainage on or around a site, to incorporate proportionate sustainable drainage systems, relative to the nature and scale of the proposal. The draft DCO has already been submitted with an Outline Operational Drainage Management Plan (APP-215) and the NPPF amendments do not alter this position.

3.4.8.11 Overall, the NPPF is a material consideration to the Transmission Assets and it provides overall and ongoing support and the associated NPPF Policy Tracker (document reference J28.1 F02) has been updated to reflect the latest changes to the NPPF. However, the NPSs (January 2024) remain the primary policy against which Transmission Assets should be considered.

Local planning policy

3.4.8.12 As set out in **section 2.1** and shown in **Figure 3.1** the onshore elements of the Transmission Assets are located within the administrative areas of Blackpool Council, Fylde Council, Preston City Council, South Ribble Borough Council and Lancashire County Council.

3.4.8.13 A summary of the relevant policies for the Transmission Assets from the development plans of the above Councils is presented below. The relevant policies are included and addressed in each of the relevant topic chapters of the submitted ES. An assessment of compliance with these is presented within **section 5** of this Planning Statement and in Appendix 3 (document reference J28.3).

3.4.8.14 During the course of the Examination, Local Impact Reports (LIRs) have been submitted by Blackpool Borough Council (REP1-068), Fylde Borough Council (REP1-078), Lancashire County Council (REP1-085) and South Ribble Borough Council (REP3-059). These include reference to local planning policies deemed to be relevant to the Transmission Assets. Where necessary, Tables 3.1 to 3.12 below have been updated and addressed in the Local Plan Policy Tracker (document reference J28.3 F02).

3.4.8.15 There are instances where the Applicants do not consider policies included in the LIRs to be relevant to the Transmission Assets. For full transparency these have been included within the trackers however have been greyed out.

3.4.8.16 Paragraph 1.3.10 of NPS EN-1 and the Rule 6 Letter (PD-006) confirms that local planning policies are important and relevant, however do not displace the primacy of the NPSs. This remains the case in draft NPS EN-1.

Blackpool Local Plan Part 1: Core Strategy

3.4.8.17 Blackpool Local Plan (Blackpool Council, 2016) sets out where new development (including housing, employment, retail and leisure) should be located to meet Blackpool's future needs to 2027. It was adopted by the Council on the 20 January 2016. It also identifies areas which will be regenerated, protected or enhanced and sets out the key development principles such as design and affordable housing.

3.4.8.18 The most relevant policies, in relation to the Transmission Assets, of the Blackpool Local Plan Part 1: Core Strategy, are summarised within the Local Planning Policy Tracker (document reference J28.3 F02). It should be noted that the Order Limits have very limited interaction with the Blackpool Council administrative area and the Transmission Assets works are not considered to impact any of the requirements in the core strategy.

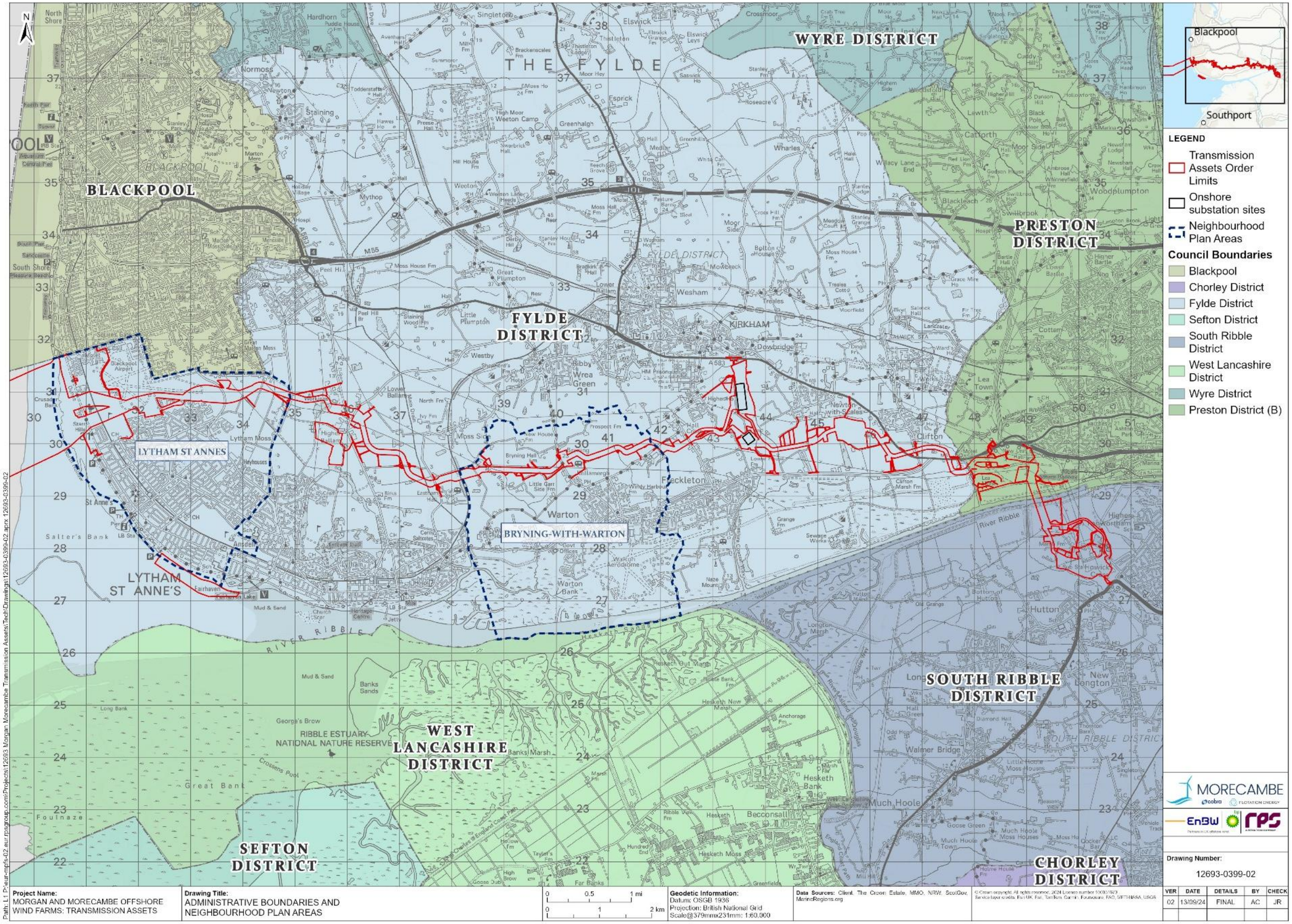


Figure 3.1: Administrative boundaries and neighbourhood plan areas

Blackpool Local Plan Part 2: Site Allocations and Development Management Policies

3.4.8.19 Blackpool Local Plan Part 2 (Blackpool, Council, 2023) allocates sites for development, safeguarding or protecting and sets out a suite of development management policies to guide appropriate development. It was adopted by the Council on 22 February 2023 and, along with the Core Strategy (Part 1), replaces all the policies in the previous Blackpool Local Plan 2001-2016.

3.4.8.20 The most relevant policies for the Transmission Assets, along with as assessment of their compliance, are within the Local Planning Policy Tracker (document reference J28.3 F02). It should be noted that the Order Limits have very limited interaction with the Blackpool Council administrative area and the Transmission Assets works are not considered to impact any of the requirements in the core strategy.

Emerging Blackpool Borough Council New Local Plan to 2045

3.4.8.21 The Applicants are aware of a new local plan for Blackpool is being developed, that will cover the period up until 2045 and will replace the Blackpool Local Plan Part 1: Core Strategy and Part 2: Site Allocations and Development Management Policies. Whilst information is currently limited, the latest Local Development Scheme (February 2025) suggests adoption is likely to be between September 2030 and February 2031. As detailed in the Blackpool Borough Council Local Impact Report (REP1-068), due to its early stage, this emerging plan will not be a material consideration in relation to the Transmission Assets.

Fylde Local Plan to 2032 (incorporating Partial Review)

3.4.8.22 The Fylde Local Plan to 2032 (Fylde Council, 2021) covers the entire borough and outlines planning policies for the period from 2011 to 2032. The plan serves as a guide for decision-making on planning applications, infrastructure development, and environmental protection. Since its adoption, there has been a Partial Review incorporated into the plan. The most recent version, which includes the Partial Review, was adopted in December 2021.

The most relevant policies for the Transmission Assets, along with as assessment of their compliance, are within the Local Planning Policy Tracker (document reference J28.3 F02). Fylde Local Plan to 2042

3.4.8.23 Fylde Borough Council has set out a timetable for the production and adoption of a new Local Plan, which will replace the current Local Plan. The new Local Plan is in the early stages of preparation, with the most recent Local Development Scheme (January 2025), and this was confirmed in their Local Impact Report (REP1-078). A Regulation 18 consultation (Options, Issues, Vision and Scope) is currently taking place between 18th September and 30th October 2025. Adoption is anticipated for October 2027; as such, the new Local Plan will not be a material consideration in the Examination of Transmission Assets.

Saint Anne's on the Sea Neighbourhood Development Plan 2016 – 2031

3.4.8.24 Saint Anne's Neighbourhood Development Plan (St. Anne's Town Council, 2016) sets out a positive vision for the future of St. Anne's, ensuring that it reflects the aspirations of its residents, who will be involved in making the plan, monitoring its progress and delivering development. The plan was adopted in May 2017 and contains a number of policies relevant to the Transmission Assets, as summarised in the Local Planning Policy Tracker (document reference J28.3 F02).

Bryning with Warton Neighbourhood Development Plan 2011 – 2032

3.4.8.25 The Neighbourhood Plan (Bryning with Warton Neighbourhood Plan Steering Group, 2017) provides a vision for the future of the community and sets out clear planning policies to realise this vision. The plan was adopted in May 2017 and contains a number of policies relevant to the Transmission Assets, as summarised in the Local Planning Policy Tracker (document reference J28.3 F02).

Preston Local Plan 2012-2026

3.4.8.26 The Preston Local Plan (Preston City Council, 2015) was adopted in July 2015 and covers the period from 2012 to 2026. It identifies the scale of development and allocates sites to meet the development needs of Preston, in line with the vision for growth outlined in the Central Lancashire Core Strategy. It also addresses key local issues and provides a set of policies to manage change. Together with the Central Lancashire Core Strategy (Preston City Council, *et al.,* 2012), the Preston Local Plan forms the development plan for all parts of the city except the City Centre (which is covered by the City Centre Area Action Plan).

3.4.8.27 The most relevant policies for the Transmission Assets, along with as assessment of their compliance, are within the Local Planning Policy Tracker (document reference J28.3 F02).

South Ribble Local Plan 2015

3.4.8.28 South Ribble Local Plan (South Ribble Borough Council, 2015) was adopted in July 2015 and plays a crucial role in shaping the future development of the South Ribble area in Lancashire. It identifies and allocates land required over a 15-year period to achieve various goals. It aims to create vibrant communities by strategically allocating land for housing, employment, natural environment and local services.

The most relevant policies for the Transmission Assets, along with as assessment of their compliance, are within the Local Planning Policy Tracker (document reference J28.3 F02). Penwortham Town Neighbourhood Development Plan 2016 -2026

3.4.8.29 The Penwortham Town Neighbourhood Development Plan 2016 - 2026 (Penwortham Town Steering Committee, 2017) sets the local strategy for development of Penwortham until 2026 and although its emphasis is mostly

on residential development and the protection of heritage assets, there are also policies regarding wider infrastructure projects, which are relevant to the Transmission Assets.

3.4.8.30 The most relevant policies for the Transmission Assets, along with as assessment of their compliance, are within the Local Planning Policy Tracker (document reference J28.3 F02). .

Central Lancashire Adopted Core Strategy

3.4.8.31 The Central Lancashire Core Strategy (Preston City Council *et al.,* 2012) is a key document within the Central Lancashire Local Development Framework. It was prepared jointly by Preston City Council, Chorley Council and South Ribble Council, and was adopted in July 2012.

3.4.8.32 The Core Strategy sets the overall strategic direction for planning in the Central Lancashire area over the period 2010 to 2026, aligning with national policies. Its primary goals are to co-ordinate development, boost investment, and enhance employment opportunities.

3.4.8.33 The strategy emphasises sustainable managed growth while preserving and enhancing green spaces and access to open countryside.

The most relevant policies for the Transmission Assets, along with as assessment of their compliance, are within the Local Planning Policy Tracker (document reference J28.3 F02). Joint Lancashire Minerals and Waste Development Framework Core Strategy

3.4.8.34 The Joint Lancashire Minerals and Waste Development Framework Core Strategy (DPD) (Blackpool Council *et al.,* 2009) was adopted in February 2009 and it is a strategic document that guides minerals and waste development in Blackpool, Blackburn with Darwen and Lancashire.

3.4.8.35 The DPD aims to reduce the impact of mineral development by promoting sustainable practices. It encourages prudent use of resources, including alternatives to primary aggregates and emphasizes sustainable transport of minerals.

The most relevant policies for the Transmission Assets, along with as assessment of their compliance, are within the Local Planning Policy Tracker (document reference J28.3 F02). Lancashire County Council Local Flood Risk Management Strategy for Lancashire 2021-2027

3.4.8.36 The Lancashire County Council Local Flood Risk Management Strategy (Blackpool Council, Blackburn with Darwen Council and Lancashire County Council, 2021) provides the principles for flood risk management for Lancashire. It includes the way flood risk will be managed and mitigated at a regional level and how these measures will be monitored.

The most relevant policies for the Transmission Assets, along with as assessment of their compliance, are within the Local Planning Policy Tracker (document reference J28.3 F02). Joint Lancashire Minerals and Waste Local Plan: Site Allocation and Development Management Policies

3.4.8.37 The Joint Lancashire Minerals and Waste site allocations document (Blackpool Council *et al.,* 2013) was adopted in September 2013 and provides site-specific policies, allocations, and detailed development management policies for minerals and waste planning for Lancashire, Blackpool and Blackburn with Darwen. It addresses both site allocations and development control policies.

The most relevant policies for the Transmission Assets, along with as assessment of their compliance, are within the Local Planning Policy Tracker (document reference J28.3 F02).

Central Lancashire Local Plan

3.4.8.38 A Local Plan for the local authorities of Preston, South Ribble and Chorley is being jointly prepared, and will cover the period to 2041. It is intended to include both strategic policy for the whole area, and detailed non-strategic policy for each local authority area. Following a Regulation 19 consultation in early 2025, the Central Lancashire Local Plan (Central Lancashire Authorities, 2025) was submitted for examination on 30 June 2025 with two Inspectors appointed to independently examine the plan. Hearing Sessions are due to take place in December 2025 and January 2026 with the latest Local Development Scheme anticipating adoption of the Local Plan between September and December 2026.

3.4.8.39 At the time of writing the Planning Statement Addendum (document reference S_D2_9), the draft Central Lancashire Local Plan had not yet been submitted for examination and was still subject to change. In accordance with Paragraph 49 of the NPPF 2024, it was considered that very little weight could be afforded to the Central Lancashire Local Plan at that time. However, since the Central Lancashire Local Plan has subsequently been submitted for examination (although has not yet been examined and is still subject to change), the Applicants acknowledge that this weight has increased.

3.4.8.40 A summary of the relevant, key policies of the draft Central Lancashire Local Plan have been provided in Appendix J28.3 F02 which includes an assessment of compliance.

4 Need for the Transmission Assets

4.1 Overview

4.1.1.1 As set out in **section 2.2**, the Transmission Assets are required to connect two nationally significant infrastructure projects - the Generation Assets for the Morgan Offshore Wind Project and the Morecambe Offshore Windfarm to the UK electricity transmission network, contributing to:

- 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.

4.1.1.2 The Generation Assets, together with the Transmission Assets, will provide up to almost 2GW of renewable energy generation capacity to the National Grid, and will therefore play an important part in securing the timely delivery of the Government's renewable energy strategy and achieving legally binding greenhouse gas emissions reduction targets.

4.1.1.3 The national and international policy commitments described in **section 3** 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.

4.1.1.4 The Transmission Assets are development of national significance for which development consent is required by virtue of the section 35 direction. On this basis, NPS EN-1 paragraph 1.3.10 applies to the Transmission Assets. This paragraph defines that *'EN-1, in conjunction with any relevant technology specific NPS, will be the primary policy for Secretary of State decision making on projects in the field of energy for which a direction has been given under section 35'.*

4.1.1.5 The NPSs establish the policy need for new renewable energy generation and transmission infrastructure. The key drivers underpinning the need for renewable energy and transmission infrastructure within the UK, and the reasons for the urgent need for new low carbon generation and transmission projects are discussed throughout this section, with the NPSs in particular considered further in **section 5**.

4.2 The need for new nationally significant energy infrastructure projects

4.2.1.1 NPS EN-1 provides the overarching policy for energy infrastructure as presented in **section 3**. This includes offshore wind and transmission infrastructure. Paragraphs 1.3.8 to 1.3.12 of NPS EN-1 relate to projects subject to a section 35 direction from the Secretary of State. Paragraph 1.3.10 states that NPS EN-1, in conjunction with other relevant technology-specific NPSs, will be the primary policy for Secretary of State decision-making on projects in the field of energy for which a direction has been given under section 35 (as is the case for the Transmission Assets).

4.2.1.2 Part 3 of NPS EN-1 outlines the urgent need for energy and transmission infrastructure in order to achieve energy security and dramatically reduce greenhouse gas (GHG) emissions (paragraphs 3.3..13.3.62 and 3.3.63).

4.2.1.3 Paragraph 3.2.6 of NPS EN-1 states that:

'The Secretary of State should assess all applications for development consent for the types of infrastructure covered by this NPS on the basis that the government has demonstrated that there is a need for those types of infrastructure which is urgent…' (paragraph 3.2.6, NPS EN-1).

4.2.1.4 Paragraph 3.2.7 states that substantial weight should be given to the contribution such projects would make towards satisfying this need. The weight given also needs to take account of the fact that in addition to being CNP Infrastructure in their own right, the Transmission Assets deliver the new clean offshore wind capacity from two nationally significant infrastructure projects. Further, paragraph 3.2.8 confirms that, when determining applications for national infrastructure, the Secretary of State is not required to consider separately the specific contribution of any individual project to satisfying the need established in the NPS.

4.2.1.5 As set out in **section 3.4.5.3**, the NPS also includes a strengthened presumption specifically in relation to CNP infrastructure. Paragraphs 3.3.62 and 4.2.4 of NPS EN-1 confirm that the Government *'… has concluded that*

there is a critical national priority for the provision of nationally significant low carbon infrastructure.'

4.2.1.6 The Transmission Assets are themselves considered to benefit from the presumptions given to CNP for low carbon infrastructure, as set out in paragraph 4.24 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 and which fit within the normal definition of 'low carbon' (as is the case for the Transmission Assets) are of a type to be considered CNP infrastructure.

4.2.1.7 In terms of determining applications for CNP infrastructure, paragraphs 4.2.15 to 4.2.17 of NPS EN-1 relate to residual impacts of CNP infrastructure. Paragraph 4.2.16 confirms that 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, providing the mitigation hierarchy requirements of NPS EN-1 have been met. The Applicants have explained their approach to mitigation through design and applied measures in each chapter of the ES and provided a summary in REP5-132 in response to the ExA's 2nd round of questions. In addition, Section 1.3, 1.4 and 1.5 of the Green Belt Technical Note (REP4-092) demonstrates how the Applicants have applied the mitigation hierarchy to avoid, minimise and mitigate impacts and harm to the Green Belt as far as practicable. As such, the starting point for determination should be that the test for very special circumstances has been met. Notwithstanding this approach, robust very special circumstances do exist, which justify and outweigh the harms to be caused to the Green Belt, by reason of inappropriateness and any other harms (Section 1.7 of REP4-092).

4.2.1.8 The strengthened presumptions in favour of CNP infrastructure include that even '*where residual non-HRA or non-MCZ impacts remain after the mitigation hierarchy has been applied, these residual impacts are unlikely to outweigh the urgent need for this type of infrastructure'* (paragraph 4.2.15). The paragraph then goes on to confirm that '… *in all but the most exceptional circumstances, it is unlikely that consent will be refused on the basis of these residual impacts*.'

4.2.1.9 Similarly, in terms of any HRA or MCZ residual impacts, paragraphs 4.2.18 to 4.2.22 confirm that the starting point is that energy security and decarbonising the power sector to combat climate change are capable of amounting to imperative reasons of overriding public interest with the benefit to the public being capable of outweighing the risk of environmental damage and NPS EN-1 imposes no limit on the number of CNP infrastructure projects that can be consented (paragraph 4.2.21).

4.2.1.10 In terms of the requirements for applicants for CNP infrastructure, paragraphs 4.2.10 to 4.2.12 of NPS EN-1 confirm that they must continue to show how their application meets the requirements of the NPSs applying the mitigation hierarchy, as well as any other legal and regulatory requirements. In addition, it confirms that they should also seek the advice of the appropriate SNCB or other relevant statutory body and demonstrate that all residual impacts are those that cannot be avoided, reduced or mitigated,

setting out how any mitigation or compensatory measures will be monitored, and reporting agreed to ensure success.

4.2.1.11 The exceptions to this presumption are set out in NPS EN-1 paragraph 4.1.7. Whilst the paragraph reiterates that the need case will outweigh the residual effects in all but the most exceptional cases, it also states that those exceptions include residual impacts onshore and offshore which present an unacceptable risk to, or unacceptable interference with, human health and public safety, defence, irreplaceable habitats or unacceptable risk to the achievement of net zero and to unacceptable interference offshore to navigation, or onshore to flood and coastal erosion risk.

4.2.1.12 The Applicants note that the CNP provision is intended to support projects that have followed appropriate planning and environmental processes and does not override those processes. The Applicants do not consider that the CNP test replaces the planning balance but rather provides additional weight to the need for the Transmission Assets where appropriate in carrying out the planning balance and considering any residual impacts (see paragraph 4.2.8 of EN-1). The Secretary of State should consider the application as a whole and the Applicants do not consider the CNP provision as introducing a new separate or elevated test.

4.2.1.13 The Applicants consider that none of the above exceptions apply to the Transmission Assets. The Transmission Assets have evolved to ensure that the mitigation hierarchy has been met in relation to impacts and effects identified, including in relation to the management of increased birdstrike risk at Warton Aerodrome and therefore there should be a strong presumption in favour of granting consent. The Mitigation Hierarchy (S_D5_5.2) sets out full detail in relation to how the Applicants have considered the mitigation hierarchy and provides greater detail around how this has been applied where there are significant residual construction impacts.

4.2.1.14 NPS EN-3 states that the government expects offshore wind to play a significant role in decarbonising the energy system. It confirms that the government has set an ambitious target to have 50 GW of offshore wind capacity by 2030, with an expectation that there will be a need for substantially more installed offshore capacity beyond this to achieve net zero by 2050.

4.2.1.15 NPS EN-5 relates specifically to transmission infrastructure. In paragraph 1.6.4, NPS EN-5 confirms that it is applicable to offshore transmission and underground cables at any voltage, including development required for an offshore wind generating station and including development that requires development consent following a section 35 direction from the Secretary of State.

4.2.1.16 NPS EN-5 reiterates at paragraph 1.1.5 that all electricity grid infrastructure within the scope of the NPS comprises CNP infrastructure:

4.2.1.17 ‘As identified in EN-1, government has concluded that there is a critical national priority (CNP) for the provision of nationally significant low carbon infrastructure. This includes: for electricity grid infrastructure, all power lines in scope of EN-5 including network reinforcement and upgrade works, and associated infrastructure such as substations. This is not limited to those

associated specifically with a particular generation technology, as all new grid projects will contribute towards greater efficiency in constructing, operating and connecting low carbon infrastructure to the National Electricity Transmission System. These are viewed by the government as being CNP infrastructure and should be progressed as quickly as possible.' *(paragraph 1.1.5, NPS EN-5).*

4.2.1.18 In preparing applications for offshore-onshore transmission, section 2.13 of NPS EN-5 outlines that there should be consideration of strategic network design (including the outcomes of the HNDR) and that a coordinated approach to design should be adopted. Radial offshore transmission options to single windfarms should only be proposed where options assessment work identifies that a co-ordinated solution is not feasible. Section 2.13 of the NPS confirms policy support for a coordinated approach, as is proposed between Morgan OWL and Morecambe OWL for the Transmission Assets.

4.3 The need to reduce greenhouse gas emissions

4.3.1.1 As set out in **section 3.2.3**, the UK is a signatory to the Kyoto protocol, which commits industrialised countries and economies to limit and reduce GHG emissions in accordance with agreed individual targets. In December 2015, 195 signatories, including the UK, adopted the first universal, legally binding global climate deal at the Paris climate conference (COP21).

4.3.1.2 The protocol came into effect in 2005 and its commitments were transposed into UK law by the Climate Change Act 2008, as amended. A revision to the targets was made through the Climate Change Act 2008 (2050 Target Amendment) Order 2019, resulting in a target for greenhouse gas emissions to be 100% lower than the 1990 levels by the year 2050.

4.3.1.3 The COP28 summit in 2023 resulted in a decision to accelerate action across all areas by 2030, including a call on governments to transition away from fossil fuels to renewables such as wind and solar power in their next round of climate commitments. At COP29, held in November 2024, governments established a new climate finance goal reflecting the scale and urgency of the climate challenge.

4.3.1.4 The COP28 summit also included the first 'global stocktake', which assessed global progress towards the goals of the Paris Agreement. The stocktake concluded that implementation of the Paris Agreement is lacking throughout the world, with a clear gap between individual countries' stated ambitions and actions and policies to achieve those goals. COP29 acknowledged the lack of momentum on the transition from fossil fuels and encouraging countries to set ambitious and investible nationally determined contributions.

4.3.1.5 The UK's ambition is to lead the world in combatting climate change, reducing reliance on fossil fuels and embracing a future where renewable energy powers homes and businesses. At the centre of this drive is a commitment to reducing UK greenhouse gas emissions and reaching net zero by 2050. The UK government has an ambition to generate 50 GW of clean, renewable energy from offshore wind by 2030. Figures released by the Department for Energy Security and Net Zero (DESNZ) show that the UK currently has approximately 15 GW of installed offshore wind capacity in the

UK up to the end of 2023 (DESNZ, 2024b). As such, there is still some way to go to meet the 2030 target. The Transmission Assets would contribute towards meeting these obligations.

4.4 Future increases in electricity demand

4.4.1.1 NPS EN-1 (paragraph 2.2.1) explains the need for the UK to meet its 2050 emissions reductions goals.

4.4.1.2 Even with major improvements in overall energy efficiency, the Government expects that demand for electricity is likely to increase, as significant sectors of energy demand switch from being powered by fossil fuels to using electricity. As a result of this electrification of demand, total electricity consumption (measured in terawatt hours over a year) could double by 2050 (HM Government, 2021).

4.4.1.3 In 2020, the Climate Change Committee identified that as demand grows, more capacity will be needed and their balanced scenario would necessitate deploying 3 GW a year of wind, to reach 430 TWh by 2050, and reach the target 40 GW of de-rated electricity capacity by 2030, and 65 to 125 GW by 2050 (Climate Change Committee, 2020).

4.4.1.4 NPS EN-1 concludes that in order to secure energy supplies that enable Government obligations for 2050 to be met, there is an urgent need for new (and particularly low carbon) energy projects to be brought forward as soon as possible. The Transmission Assets would contribute significantly towards meeting these obligations as a project for which development consent is required to connect two low carbon energy generating NSIPs which are considered CNP infrastructure.

4.5 Role of offshore wind and the national policy support

4.5.1.1 As set out in **section 3.3**, the role of offshore wind is key in achieving the UK Government's renewable energy targets for 2030 and 2050. These targets are set out in a range of recent commitments, including:

- The Energy Act 2015;
- The Clean Growth Strategy 2017;
- The National Infrastructure Assessments 2018 and 2023 and the National Infrastructure Strategy 2020;
- The Ten Point Plan for Green Industrial Revolution 2020;
- The Energy White Paper: Powering Our Net Zero Future 2020;
- Net Zero Strategy: Build Back Greener 2012;
- British Energy Security Strategy 2022;
- Powering Up Britain: The Net Zero Growth Plan 2023; and
- Great British Energy founding statement (DESNZ, 2024a).

4.5.1.2 The offshore wind industry presents an opportunity to utilise and further develop the UK's maritime engineering skills as other industries decline (such

as shipbuilding and North Sea oil) in order to secure supply chain and other employment opportunities in the UK. The importance of maximising opportunities to grow the offshore wind supply chain to accelerate and de-risk delivery, as well as grow market share and technology leadership for the UK is the main aim of the Offshore Wind Industrial Growth Plan (Offshore Wind Industry Council *et al*., 2024).

4.5.1.3 As set out in **section 3.3**, the above legislation and policy documents set out ambitious targets for the contribution of offshore wind to renewable targets and ensuring a secure energy supply. The updated strategy 'Powering our Net Zero Future' (HM Government, 2023a) confirmed the UK's commitment to having a decarbonised power system by 2035, with the majority of power generated from renewable sources such as wind and solar. It targets an increase to 50 GW of offshore wind capacity by 2030. This is a 3.5-fold increase on today's installed capacity. In addition, the UK Government would generate more power than all our homes use today, back new innovations to make the most of this proven technology and invest to bring new jobs and growth to our ports and coastal regions.

4.6 Local climate change declarations, targets and actions

4.6.1.1 Blackpool Council, Preston City Council, South Ribble Borough Council and Lancashire County Council have all declared climate emergencies which recognise the important role renewable energy has in minimising the impact of climate change and have set a target to reach net zero by 2030, mitigating climate change through green energy production, increasing energy efficiency, and reducing emissions caused by the larger emitters.

4.6.1.2 Although Fylde Council has not declared a climate emergency, the Council is currently working to achieve their net-zero target and reduce greenhouse gas emissions from Council operations.

4.6.1.3 The Transmission Assets will connect two large offshore wind farms, both NSIPs in their own right to the UK electricity transmission network, contributing to meeting both national and local climate change goals.

5 Accordance with National Policy Statements and other national and local policy

5.1 Overview

5.1.1.1 This section presents a high level overview of the Transmission Assets' accordance with each relevant NPS, as well as with other relevant policy, including marine policy, the NPPF and relevant local planning policy, as set out in **section 3**.

5.1.1.2 To reiterate, the Transmission Assets are development for which development consent is required by virtue of the section 35 direction. On this basis NPS EN-1 paragraph 1.3.10 applies to the Transmission Assets which defines that '*EN-1, in conjunction with any relevant technology specific NPS, will be the primary policy for Secretary of State decision making on projects in the field of energy for which a direction has been given under section 35*'.

5.1.1.3 Further details of compliance with the NPSs are provided in the NPS tracker (document reference J26).

5.1.1.4 With regards to the NPSs, the latest versions were published in November 2023 and formally designated on 17 January 2024. Therefore, the application for development consent and this Planning Statement has regard to these designated NPSs.

5.1.1.5 Each topic section of this Planning Statement is considered using the following structure:

- topic name and document reference;
- summary of assessment and identification of main elements;
- proposed mitigation measures (if required); and
- any significant effects.

5.1.1.6 In terms of general environmental effects/considerations, section 4.3 of NPS EN-1 sets out the approach that applicants should take. The Applicants have complied with the requirements of this section of NPS EN-1 as set out below.

5.1.1.7 As the Transmission Assets are subject to the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations), the application is accompanied by an ES.

5.1.1.8 In accordance with **NPS EN-1 paragraph 4.3.10**, the ES provides information proportionate to the scale of the Transmission Assets that is sufficient to meet the requirements of the EIA Regulations.

5.1.1.9 **NPS EN-1 paragraphs 4.3.11 and 4.3.12** recognise that where consent is applied for and obtained before construction commences, there may be design elements that are unknown to an applicant at the time of application. The Transmission Assets has adopted a project design envelope approach. This approach defines a design envelope and parameters within which the final design will sit. This allows flexibility for elements that are likely to require more detailed design subsequent to submission of an ES, such as siting of infrastructure and construction methods. It also allows the findings of the

consultation process and feedback from statutory and non-statutory stakeholders to be considered during the design process, where appropriate.

5.1.1.10 The adoption of this approach allows meaningful EIA to take place by defining a 'maximum design scenario' on which to base the identification of likely environmental effects. The maximum design scenario is the scenario that would give rise to the greatest impact (and subsequent effect). For example, where several substation design options are under consideration, the assessment is based on the option predicted to have the largest magnitude of impact. This may be the option with the largest footprint, the greatest height or the largest area of disturbance during construction, which could vary depending on the topic under consideration. By identifying the maximum design scenario for any given impact, it can be concluded that the impact (and therefore the resulting effect) would be no greater for any other design scenario. Further details can be found in Volume 1, Chapter 5: Environmental assessment methodology of the ES (document reference F1.5).

5.1.1.11 In order to avoid repetition in the topic sections below, it is also confirmed that all topics have assessed all phases of the Transmission Assets (construction, operation and maintenance, and decommissioning) and the cumulative effects of the Transmission Assets in conjunction with other projects, as well as potential transboundary effects.

5.1.1.12 Additionally, it is noted that a number of NPS EN-1 topic-specific sections refer to the 25 Year Environment Plan (HM Government, 2018). The UK government set out its vision for a quarter of-a-century action to help the natural world regain and retain good health, and a commitment to review the plan every five years was set into law in the Environment Act 2021. The Environmental Improvement Plan was published in 2023 (HM Government, 2023b), which reinforces the intent of the 25 Year Environment Plan and sets out a plan to deliver on its framework and vision. The government's policy for biodiversity is set out in the Environmental Improvement Plan 2023, the aim of which is to halt overall biodiversity loss by 2030 and then reverse loss by 2042 in the context of the challenge presented by climate change.

5.1.1.13 The Environment Act 2021 sets out a number of targets and those that are relevant to the Transmission Assets are considered in the NPS tracker (document reference J26).

5.2 Physical processes

5.2.1.1 Volume 2, Chapter 1 of the ES (document reference F2.1) sets out the assessment of effects in relation to physical processes. The term physical processes refer to coastal and marine processes and their relationship with the physical environment. This includes tidal currents, the wave climate and the sediment transport regime.

5.2.1.2 The assessment of physical processes for the Transmission Assets has been informed by modelling undertaken for the Morgan Offshore Wind Project and site-specific survey data. This has been considered together with a detailed review of existing studies and datasets, including those relating to the Generation Assets.

5.2.1.3 The assessments were undertaken having full regard to NPS EN-1 paragraphs 5.6.10 – 5.6.17 and 5.6.23 and NPS EN-3 paragraphs 2.8.111 – 2.8.114; 2.8.119; 2.8.123 – 2.8.125; ; 2.8.126; 2.8.197- 2.8.200; 2.8.224 and 2.8.225.

5.2.1.4 Mitigation measures proposed by the Applicants include the following, as detailed in the Commitments Register (document reference F1.5.3) and secured through the relevant DCO requirements and marine licence conditions. These documents have been updated throughout the Examination to address points and concerns raised by relevant stakeholders:

- Outline Offshore Cable Specification and Installation Plan (document reference J15), including details of cable burial depths, cable protection, cable monitoring and a cable layout plan.
- Construction Method Statement(s) will be produced and include details of foundation installation of methodology covering scour protection and the deposition of material arising from drilling, dredging, and/or soundwave clearance.

5.2.1.5 The Transmission Assets have been assessed as required by the relevant NPSs and the North West Inshore and North West Offshore Marine Plan.

5.2.1.6 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. There would be no significant cumulative or transboundary effects.

5.2.1.7 Accordingly, it has been demonstrated that the Transmission Assets accord with the requirements of NPS EN-1 and EN-3 and with Policies NW-CAB-1, NW-MPA-1, NW-MPA-4, NW-BIO-1 and NW-CE-1 of the North West Inshore and North West Offshore Marine Plan. A full list of compliance is included in the NPS tracker (document reference J26) and marine policies tracker (document reference J28.2).

5.3 Benthic subtidal and intertidal ecology

5.3.1.1 Volume 2, Chapter 2 of the ES (document reference F2.2) sets out the assessment of effects in relation to benthic ecology. Benthic ecology refers to the communities of animals and plants that live on or in the seabed and the relationships that they have with each other and with their physical environment. Subtidal ecology relates to the ecology present beneath mean low water springs, while intertidal area relates to the area between mean low water springs and mean high water springs. Effects on the protected features associated with the Fylde Marine Conservation Zone are also set out within the MCZ Assessment (document reference E4).

5.3.1.2 The assessment for benthic ecology has been informed by a series of site-specific surveys using grab sampling and underwater video. An intertidal survey was also undertaken.

5.3.1.3 Mitigation measures proposed by the Applicants include the following, as detailed in the Commitments Register (document reference F1.5.3 and secured through the relevant DCO requirements and marine licence

conditions. These documents have been updated throughout the Examination to address points and concerns raised by relevant stakeholders:

- Trenchless crossings to be undertaken by non-impact methods such as Horizontal Directional Drilling (or other trenchless techniques including micro tunnelling and direct pipe) in order to minimise construction noise and vibration beyond the immediate location of works.
- An Outline Offshore Cable Specification and Installation Plan (document reference J15), including details of cable burial depths, cable protection, cable monitoring and a cable layout plan. This includes measures to limit the extent of cable protection and sandwave clearance within the Fylde MCZ and for any cable protection used within the Fylde MCZ to be designed to be removable on decommissioning.
- An Offshore Environmental Management Plan will be developed, to include a Marine Pollution Contingency Plan. This will include details of measures to prevent accidental spills, address all potential contaminant releases and include key emergency details, as well as action proposed to minimise invasive species.
- All permanent infrastructure located between mean low water springs and mean high water springs will be buried to a target depth of 3 metres, subject to further pre-construction surveys to be reported within a Cable Burial Risk Assessment.
- Construction Method Statement(s) will be produced prior to construction and details of cable installation and foundation installation.
- A Marine Enhancement Statement (document reference J12) provides further information on the approach of the Transmission Assets to biodiversity benefit and ecological enhancement.

5.3.1.4 With regard to benthic subtidal and intertidal ecology, the Transmission Assets have been assessed as required by the relevant NPSs and the North West Inshore and North West Offshore Marine Plan.

5.3.1.5 The assessment has not identified any significant effects arising from the Transmission Assets during the construction, operation and maintenance, or decommissioning phases. Cumulative effects with other developments have been assessed. One significant cumulative effect has been identified with the Morgan Offshore Wind Project, in relation to temporary habitat disturbance/loss. The significance of this cumulative effect is predicted to decrease in the long term as the sediments and associated benthic communities will recover over time. In the longer term, no significant cumulative effects are predicted. Natural England have not raised any concerns over the residual cumulative effect in relation to temporary habitat disturbance/loss reducing from moderate to minor adverse over time. The MMO confirmed agreement with the residual effects of the cumulative assessment in their SoCG (REP6-130).

5.3.1.6 Accordingly, it has been demonstrated that the Transmission Assets accord with the requirements of NPS EN-1 paragraphs 4.3.10 to 4.3.29; 5.4.9; 5.4.16 – 5.4.17; 5.4.19 - 5.4.21; 5.4.35 - 5.4.36; 5.4.42 - 5.4.43; 5.4.48; 5.6.10 - 5.6.11 - 5.6.13 and NPS EN-3 paragraphs 2.8.52 – 2.8.53; 2.8.90; 2.8.92;

2.8.106;2.8.112; 2.8.113; 2.8.119; 2.8.126; 2.8.231 - 2.8.235; 2.8.317 and and with Policies NW-MPA-1, NW-BIO-1, NW-BIO-2, NW-BIO3, NW-INNS-1, NW-CE-1 of the North West Inshore and North West Offshore Marine Plan. A full list of compliance is included in the NPS tracker (document reference J26) and marine policies tracker (document reference J28.2).

5.4 Fish and shellfish ecology

5.4.1.1 Volume 2, Chapter 3 of the ES sets out the assessment of effects in relation to fish and shellfish ecology (document reference F2.3).

5.4.1.2 Fish and shellfish ecology refers to communities of animals (various commercially and ecologically important fish, crustacean and mollusc species). This includes those that live in the water column or on and in the seabed, including diadromous fish (those that move between freshwater to saltwater) which move into freshwater environments for spawning activity and the relationships these organisms have with each other and the physical environment.

5.4.1.3 The fish and shellfish ecology assessment has been informed primarily by a literature review of the large amount of data available on the species found in the Irish Sea, stakeholder consultation, and incorporation of some site-specific data collected where possible. The assessments were undertaken having full regard to the relevant sections of NPSs EN-1 and EN-3. Relevant data from seabed characterisation surveys were also considered to better understand the habitats present.

5.4.1.4 Mitigation measures proposed by the Applicants include the following, as detailed in the Commitments Register (document reference F1.5.3 and secured through the relevant DCO requirements and marine licence conditions. These documents have been updated throughout the Examination to address points and concerns raised by relevant stakeholders:.

- Outline Offshore Cable Specification and Installation Plan (document reference J15), including details of cable burial depths, cable protection, cable monitoring and a cable layout plan.
- An Outline Marine Mammal Mitigation Protocol (document reference J18), including measures to be adopted during construction to reduce the risk of injury to marine mammals and fish species.
- An Offshore Environmental Management Plan, including actions to minimise invasive species and a Marine Pollution Contingency Plan which will include planning for accidental spills, address all potential contaminant releases and include key emergency details.
- Construction Method Statement(s) will be produced prior to construction and details of cable installation and foundation installation.

5.4.1.5 There is potential for herring to be subject to effects from underwater sound, should unexploded ordnance clearance occur during the known spawning period for this species, however given the very short duration, highly

intermittent nature of potential clearance activities and implementation of the mitigation hierarchy, this is an unlikely scenario.

5.4.1.6 Cod is also considered sensitive to underwater sound. However, based upon the short term and intermittent nature of potential clearance events, and the application of the mitigation hierarchy, no significant effect for cod, along with herring and other fish and shellfish species is predicted.

5.4.1.7 In terms of temporary and long term habitat loss or disturbance, the proportion of habitat lost, including spawning and nursery grounds, associated with the Transmission Assets is predicted to be small in the context of available habitats in the wider area and natural behaviours are expected to return following short term habitat disturbance.

5.4.1.8 A Marine Enhancement Statement (document reference J12) is provided as part of the application.

5.4.1.9 Based on the above, the assessment has not identified any significant effects arising from the Transmission Assets during the construction, operation and maintenance or decommissioning phases and has not identified any significant cumulative effects, which demonstrates that the Transmission Assets accord with the requirements of **NPS EN-1 paragraphs 4.1.11 - 4.1.15; 4.3.3 – 4.3.6; 4.3.10 - 4.3.12; 4.5.8 – 4.5.9; 4.10.6-12; 4.12.5 - 4.12.7; 5.4.17 - 5.4.22; 5.4.35 - 5.4.36; 5.4.42; 5.4.48; 5.6.10; 5.12.6 and 5.12.11 - 5.11.12; NPS EN-3 paragraphs 2.8.72; 2.8.83 – 2.8.85; 2.8.101 - 2.8.106; 2.8.148 - 2.8.151; 2.8.221; 2.8.239 - 2.8.239; 2.8.245 – 2.8.249 and 2.8.302 – 2.8.303**. The Transmission Assets also comply with policies on **Marine ecology and biodiversity, renewable energy and fisheries of the UK Marine Policy Statement and NW-FISH-3, NW-MPA-A, NW-BIO-2, NW-INNS-1, NW-DIST-1, NW-UWN-2, NW-CE-1** and **NW-CBC-1** of the North West Inshore and North West Offshore Marine Plan. A full list of compliance is included in the NPS tracker (document reference J26) and marine policies tracker (document reference J28.2).

5.5 Marine mammals

5.5.1.1 Volume 2, Chapter 4 of the ES (document reference F2.4), sets out the assessment of effects in relation to marine mammals.

5.5.1.2 Information on marine mammals within the study area was collected through desktop review, site surveys and consultation.

5.5.1.3 Two site-specific aerial digital survey campaigns that fall within the Offshore Order Limits have informed the baseline characterisation. These were undertaken for the Generation Assets.

5.5.1.4 In addition, an extensive review of existing studies and datasets, including other plans and projects within the study area, was undertaken to characterise the baseline environment for marine mammals. Data from research surveys have also been considered.

5.5.1.5 Mitigation measures proposed by the Applicants include the following, as detailed in the Commitments Register (document reference F1.5.3) and secured through the relevant DCO requirements and marine licence conditions. These documents have been updated throughout the

Examination to address points and concerns raised by relevant stakeholders:.

- Outline Offshore Cable Specification and Installation Plan (document reference J15), including details of cable burial depths, cable protection, cable monitoring and a cable layout plan.
- The implementation of a Marine Mammal Mitigation Protocol and measures such as soft start, ramp up for piling and the use of low-order techniques for unexploded ordnance detonation to reduce the risk of injury for all species.
- Development of, and adherence to, an Offshore Environmental Management Plan, including a Marine Pollution Contingency Plan which will include planning for accidental spills, address all potential contaminant releases and include key emergency details.
- Construction Method Statement(s) will be produced prior to construction and details of cable installation and foundation installation.
- Vessel Traffic Management Plan(s) will be developed pre-construction in line with legislation, guidance and industry best practice which will:
  - determine vessel routing to and from construction areas and ports;
  - include vessel standards and a code of conduct for vessel operators; and
  - minimise, as far as reasonably practicable, encounters with marine mammals.

5.5.1.6 An Offshore Decommissioning Programme(s) will be developed prior to decommissioning.

5.5.1.7 One significant cumulative effect was identified, relating to potential injury from unexploded ordnance clearance for harbour porpoise if high order detonation had been required.

5.5.1.8 However, the Applicants confirm that an updated version of Volume 2, Chapter 4: Marine Mammals (F2.4/F02) has been submitted at Deadline 5, to reflect that high order UXO has been removed from the draft DCO and to align with the changes related to the impact of Injury and disturbance from elevated underwater sound during UXO clearance made at Deadline 6 for the Morgan Offshore Wind Farm: Generation Assets (Morgan Generation Assets examination Library REP6-031), as requested by Natural England at Deadline 2 for the Transmission Assets (REP-062). Schedule 14 and 15, Part 2, Condition 20 was updated at Deadline 1 to reflect amendments to the draft DCO and DML that remove the ability to undertake high order unexploded ordnance clearance from the deemed marine licence, in response to the
MMO's relevant representation (RR-1414.2 in PDA-013).

5.5.1.9 Accordingly, it has been demonstrated that Transmission Assets, subject to the mitigation proposed, accords with the requirements of **NPS EN-1 paragraphs 5.4.17- 5.4.22 and 5.3.35** as well as **NPS EN-3 paragraphs 2.8.52 - 2.8.53; 2.8.90 – 2.8.92; 2.8.98; 2.8.102 – 2.8.106; 2.8.131 – 2.8.135**

and 2.8.237 – 2.8.239 and with the **UK Marine Policy Statement and NW-MPA-1, NM-BIO-2, NW-UWN-2 and NW-CE-1** of the North West Inshore and North West Offshore Marine Plan.

5.5.1.10 A full list of compliance is included in the NPS tracker (document reference J26) and marine policies tracker (document reference J28.2).

5.6 Offshore ornithology

5.6.1.1 Volume 2, Chapter 5 of the ES (document reference F2.5) sets out the assessment of effects in relation to offshore ornithology. Offshore ornithology refers to the communities of birds that utilise or fly over the area seaward of mean low water springs.

5.6.1.2 The identification of existing conditions was informed by desk-based studies and supporting survey data from surveys of the Generation Assets.

5.6.1.3 Mitigation measures proposed by the Applicants include the following, as detailed in the Commitments Register (document reference F1.5.3) and secured through the relevant DCO requirements and marine licence conditions. These documents have been updated throughout the Examination to address points and concerns raised by relevant stakeholders:.

- Outline Offshore Cable Specification and Installation Plan (document reference J15), including details of cable burial depths, cable protection, cable monitoring and a cable layout plan.
- An Offshore Decommissioning Programme(s) will be developed prior to decommissioning.
- An Offshore Environmental Management Plan(s), including details of:
  - a marine pollution contingency plan; and
  - measures to minimise disturbance to rafting birds from vessels.
- Construction activities associated with the offshore cable pull in for the Morgan Offshore Wind Project and Morecambe Offshore Windfarm Limited will be undertaken in accordance with the Outline Offshore Cable Specification and Installation Plan (CSIP). This will include a timing restriction on all cable pull activities at landfall on Lytham St Annes beach between November and March (inclusive), unless otherwise agreed with the MMO, in consultation with Natural England. Detailed CSIP(s) will be developed in accordance with the Outline CSIP
- Furthermore, the Applicants have committed to a full seasonal restriction on all construction activity and low order UXO clearance from November to March (inclusive) within the original Liverpool Bay SPA boundary plus a 2 km buffer [REP2-05]. Additionally, the Applicants have made a further commitment at Deadline 4 that the Applicants will not plan routine O&M activities in the original Liverpool Bay SPA (as designated in 2010), including a 2km buffer between November and March (inclusive) unless in urgent circumstances (see CoT135 in F1.3.5 /F05)

5.6.1.4 The Applicants' approach to biodiversity enhancement is presented in the Marine Enhancement Statement (document reference J12). The Applicants have identified a number of opportunities within the Irish Sea which could deliver additional intertidal and offshore biodiversity benefits, including increases to the productivity of breeding seabirds, biodiversity enhancing cable protection, artificial reef blocks and restoration of fish and shellfish habitats outside of protected sites. The Applicants will continue to explore these opportunities as the design of the Transmission Assets develops, in collaboration with stakeholders post-consent.

5.6.1.5 Overall, the assessment has not identified any significant effects arising from the Transmission Assets during the construction, operation and maintenance or decommissioning phases or significant cumulative impacts.

5.6.1.6 Accordingly, it has been demonstrated that the Transmission Assets accord with the requirements of NPS EN-1 paragraphs 4.3.1, 4.3.3, 4.3.5, 4.3.10, 4.3.11,4.3.12, 5.4.4, 5.4.5, 5.4.7, 5.4.16, 5.4.17, 5.4.19, 5.4.35, 5.4.48, and 5.4.55 as well as EN-3 paragraphs 2.8.143, 2.8.104, 2.8.136 and 2.8.302 and NPS EN-5 paragraphs 2.7.2, 2.7.3, 2.9.5 and 2.9.6. In addition, Transmission Assets also comply with the requirements of NW-SCP-1, NW-DIST-1, NW-UWN-2, NW-CBC-1, NW-MPA-1, NW-BIO-1, NW-BIO-2 and NW-CE-1 of the North West Inshore and North West Offshore Marine Plan. A full list of compliance is included in the NPS tracker (document reference J26) and marine policies tracker (document reference J28.2).

5.7 Commercial fisheries

5.7.1.1 Volume 2, Chapter 6 of the ES (document reference F2.6) sets out the assessment of effects in relation to commercial fisheries. Commercial fisheries are defined as any form of fishing activity where the catch is sold for taxable profit. The existing commercial fisheries conditions were characterised through a review of publicly available data, site-specific surveys and consultation with fisheries stakeholders.

5.7.1.2 Impacts that have been assessed within include loss or restricted access to fishing grounds, displacement of fishing activity, loss of damage to fishing gear due to snagging, potential impacts on commercially important fish and shellfish resources stocks and supply chain opportunities for local fishing vessels.

5.7.1.3 Mitigation measures proposed by the Applicants include the following, as detailed in the Commitments Register (document reference F1.5.3) and secured through the relevant DCO requirements and marine licence conditions. These documents have been updated throughout the Examination to address points and concerns raised by relevant stakeholders:.

- Outline Offshore Cable Specification and Installation Plan (document reference J15), including details of cable burial depths, cable protection, cable monitoring and a cable layout plan.
- Outline Fisheries Liaison and Coexistence Plan(s), setting out the commitments relating to coexistence with the fishing industry and to

ensure navigational safety. This includes the appointment and responsibilities of a company fisheries liaison officer. The Outline Fisheries Liaison and Coexistence Plan(s) also includes details for providing advance warning and information on accurate locations for construction and maintenance activities, associated Safety Zones and advisory passing distances to be given via Notifications to Mariners to ensure navigation safety.

5.7.1.4 The assessment has not identified any significant effects arising from the Transmission Assets during the construction, operation and maintenance, or decommissioning phases in relation to commercial fisheries. It is also concluded that there will be no significant cumulative effects on commercial fisheries from the Transmission Assets alongside other projects/plans following the implementation of embedded and further mitigation measures.

5.7.1.5 Accordingly, it has been demonstrated that the Transmission Assets accord with the requirements of **NPS EN-3; paragraphs 2.8.147 – 2.8.151; 2.8.152 – 2.8.164 and 2.8.318 - 2.8.324; paragraphs 3.8.1 – 3.8.2** of UK Marine Policy Statement as well as **policies NW-FISH-2, NW-FISH-3, NW-CE-1 and NW-CO-1** of the North West Inshore and North West Offshore Marine Plan. A full list of compliance is included in the NPS tracker (document reference J26) and marine policies tracker (document reference J28.2).

5.8 Shipping and navigation

5.8.1.1 Volume 2, Chapter 7 of the ES (document reference F2.7) sets out the assessment of effects in relation to shipping and navigation. This is supported by the Navigation Risk Assessment (document reference F2.7.1). This considers impacts upon maritime safety and the activities of commercial shipping, ferries, ports/harbours, commercial fisheries, recreational cruising and other maritime operations.

5.8.1.2 The existing shipping and navigation conditions were identified through a review of relevant publications, collection and analysis of historic vessel traffic and incident data and consultation with key stakeholders.

5.8.1.3 Mitigation measures proposed by the Applicants include the following, as detailed in the Commitments Register (document reference F1.5.3) and secured through the relevant DCO requirements and marine licence conditions. These documents have been updated throughout the Examination to address points and concerns raised by relevant stakeholders:.

- Cable Burial Risk Assessment will be included as part of the Outline Offshore Cable Specification and Installation Plan (document reference J15)
- Layout Principles to be agreed with the Marine Management Organisation, in consultation with the Maritime Coastguard Agency and Trinity House prior to construction.
- Development of Fisheries Liaison and Co-existence Plan, Offshore Emergency Response and Safety Plan and an Outline Offshore Construction Environmental Management Plan (to include a marine

pollution contingency plan). This will include details for providing advance warning and information on accurate locations for construction and maintenance activities, associated Safety Zones, and advisory passing distances to be given via Notifications to Mariners to ensure navigation safety.

- Safety Zone Statements will be produced and include safety zones of up to 500 m and the use of guard vessels.

5.8.1.4 The Applicants will ensure compliance with legislation for vessel traffic monitoring and continuous watch, where appropriate, in consultation with the Maritime Coastguard Agency and would be secured through relevant conditions as part of the marine licence(s) and suitable lighting and marking of offshore structures.

5.8.1.5 Overall, the assessment has not identified any significant effects arising from the Transmission Assets during the construction, operation and maintenance, or decommissioning phases in relation to shipping and navigation.

5.8.1.6 The impact on vessel to vessel collision risk, snagging risk and oil and gas navigation, operations and safety were assessed as having a moderate (but as low as reasonably possible) adverse effect.

5.8.1.7 Commitments are set out by the Applicants to mitigate the risk and minimise the contribution of the Transmission Assets to any cumulative effects. Commitments are also set out separately by the Generation Assets and the Mona Offshore Wind Project will also mitigate against the effects on commercial operators.

5.8.1.8 In summary, it is considered that the Transmission Assets, subject to the mitigation proposed, accords with the requirements of NPS EN-3 which recognises at paragraph 2.8.178 that it is inevitable that offshore wind farms will have an impact on navigation in and around the area of their sites.

5.8.1.9 With regard to shipping and navigation, the Transmission Assets have been assessed as required by the relevant **NPS EN-3 paragraphs 2.8.178 – 2.8.190 and 2.8.195; UK Marine Plan 2011 and policies PS-1 to PS-4** of the North West Inshore and North West Offshore Marine Plan. A full list of compliance is included in the NPS tracker (document reference J26) and marine policies tracker (document reference J28.2).

5.9 Marine archaeology

5.9.1.1 Volume 2, Chapter 8 of the ES (document reference F2.8) sets out the assessment of effects in relation to marine archaeology.

5.9.1.2 Marine archaeology refers to the physical remains of the human past that survive within the marine environment. This includes maritime archaeology, such as shipwrecks and submerged prehistory.

5.9.1.3 The existing marine archaeology conditions have been characterised through a review of existing data and studies alongside an assessment of site-specific geophysical surveys.

5.9.1.4 Mitigation measures proposed by the Applicants include the following, as detailed in the Commitments Register (document reference F1.5.3) and

secured through the relevant DCO requirements and marine licence conditions. These documents have been updated throughout the Examination to address points and concerns raised by relevant stakeholders:.

- An offshore written scheme of investigations for archaeology, including:
  - the requirement for Archaeological Exclusion Zones and Temporary Archaeological Exclusion Zones, as presented in the Offshore Historic Environment Plan;
  - implementation of a Protocol for Archaeological Discoveries in accordance with 'Protocol for Archaeological Discoveries: Offshore Renewables Projects';
  - the incorporation of marine archaeology specification and analysis in further pre-construction surveys;
  - operational awareness and avoidance, where possible, of low potential anomalies;
  - where avoidance of low potential anomalies is not possible, mitigation measures for potential direct impacts to marine archaeology; and
  - details of reporting and archival requirements.

5.9.1.5 Overall, the assessment has not identified any significant effects arising from the Transmission Assets during the construction, operation and maintenance or decommissioning phases. Cumulative effects with other developments have been assessed. The assessment has not identified any significant cumulative effects.

5.9.1.6 The provisions of an Outline Offshore Written Scheme of Investigation for Archaeology (document reference J17) will result in a beneficial effect in relation to marine archaeology as these will ensure that any future geophysical and geotechnical surveys undertaken that result in the production of new archaeological data and, therefore, the understanding of the historic marine environment of the area will be made public.

5.9.1.7 Given the limited adverse effects and the beneficial effect of the Transmission Assets in relation to marine archaeology, it is considered that the Transmission Assets accord with the requirements of **NPS EN-1 paragraphs 5.9.10 - 5.9.13** and N**PS EN-3 paragraphs 2.8.76 - 2.8.78; 2.8.104; 2.8.176 and 2.8.252 - 2.8.253** as well as the **UK Marine Policy Statement and policies NW-AGG-1; NW-CO-1; NW-CAB-1; NW-CAB-3 and NW-OG-1** of the North West Inshore and North West Offshore Marine Plan. A full list of compliance is included in the NPS tracker (document reference J26) and marine policies tracker (document reference J28.2).

5.10 Other sea users

5.10.1.1 Volume 2, Chapter 9 of the ES (document reference F2.9) sets out the assessment of effects in relation to other sea users. This includes consideration of the following.

- aggregate extraction and disposal sites.
- recreational diving and bathing sites.
- recreational activities such as sailing, motor cruising, recreational fishing and inshore water sports.
- offshore infrastructure such as:
  - offshore wind farms;
  - oil and gas activities;
  - Carbon Capture Storage (CCS) activities;
  - Offshore hydrocarbon platforms;
  - cables; and
  - pipelines.

5.10.1.2 Data has been collated based on existing data sources at both a regional and local level. No site-specific surveys have been undertaken to inform the EIA process for other sea users. This is because a sufficient amount of information relating to other sea users is already available.

5.10.1.3 Mitigation measures proposed by the Applicants include the following, as detailed in the Commitments Register (document reference F1.5.3) and secured through the relevant DCO requirements and marine licence conditions. These documents have been updated throughout the Examination to address points and concerns raised by relevant stakeholders:.

- Outline Offshore Cable Specification and Installation Plan (document reference J15), including details of cable burial depths, cable protection, cable monitoring and a cable layout plan.
- A Fisheries Liaison and Coexistence Plan(s), including details for providing advance warning and information on accurate locations for construction and maintenance activities, associated Safety Zones, and advisory passing distances to be given via Notifications to Mariners to ensure navigation safety.
- Crossing and proximity agreements with known existing pipeline and cables operators.
- Ongoing liaison with the fishing industry through the appointment of a Company Fisheries Liaison Officer(s) and adherence to good practice guidance with regards to fisheries liaison.
- The United Kingdom Hydrographic Office will be notified of both the commencement, progress and completion of offshore construction works to allow marking of all installed infrastructure on nautical charts.
- Safety zones of up to 500 m will be applied during construction, maintenance and decommissioning activities. Where defined by risk assessment, guard vessels will also be used to ensure adherence with Safety Zones or advisory passing distances to mitigate impacts which pose a risk to surface navigation.

5.10.1.4 To address cooperation, co-existence and simultaneous operations, the Applicants updated the Commitments register (REP5-027) at Deadline 5 to consult, during all phases, with other offshore energy operators to promote and maximise cooperation between parties and minimise both spatial and temporal interactions between potentially conflicting activities (CoT137).

5.10.1.5 Overall, it is concluded that there will be no significant effects arising from the Transmission Assets on other sea users during the construction, operation and maintenance, or decommissioning phases. It is also concluded that there will be no significant cumulative effects from the Transmission Assets on other sea users alongside other projects/plans.

5.10.1.6 Given there are no significant adverse effects, it is considered that the Transmission Assets accord with the requirements of **NPS EN-1 paragraphs 3.3.71** and **5.5.35** and **NPS EN-3 paragraphs 2.8.44; 2.8.196-201; 2.8.261 – 2.8.262; 2.8.342 – 2.8.345 and 2.8.348** and **Policies NW-AGG-1, NW-CO-1, NW-CAB-1, NW-CAB-3 and NW-OG-1** of the North West Inshore and North West Offshore Marine Plan.

5.10.1.7 A full list of compliance is included in the NPS tracker (document reference J26) and marine policies tracker (document reference J28.2).

5.11 Geology, hydrogeology and ground conditions

5.11.1.1 Volume 3, Chapter 1 of the ES (document reference F3.1) sets out the assessment of effects in relation to geology, hydrogeology and ground conditions. This includes consideration of effects in relation to geological and land conditions (including land contamination), as well as effects on groundwater.

5.11.1.2 The assessments undertaken have been based on a desktop review of publicly available information, online data sources and publishing and information contained in a Groundsure Enviro-Geo Insights report. A Phase 1 Geo-Environmental Preliminary Risk Assessment has been produced to support the assessment (document reference F3.1.1).

5.11.1.3 Mitigation measures proposed by the Applicants include the following, as detailed in the Commitments Register (document reference F1.5.3) and secured through the relevant DCO requirements. These documents have been updated throughout the Examination to address points and concerns raised by relevant stakeholders:.

- Impacts on the designated dunes at Lytham St. Annes Dunes SSSI, Lytham St Annes Local Nature Reserve (LNR) and St Annes Old Links Golf Course & Blackpool South Rail Line Biological Heritage Site (BHS) will be avoided through the use of direct pipe trenchless construction techniques to pass beneath the dunes. In addition, the Applicants have submitted an outline hydrogeological risk assessment for Lytham St Annes Dunes SSSI (REP6-140) secured through Requirement 8 of Schedules 2A and 2B to the draft DCO submitted at deadline 6 (REP6-013).

- Construction will 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.
- Where areas of contamination (e.g. landfills) cannot be avoided within the Transmission Assets Order Limits, a ground investigation will be implemented. 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 foundation risk assessment will be developed prior to the commencement of construction. The Environment Agency will be consulted on the detail of this plan.
- Where the onshore export cable corridor or 400 kV grid connection cable corridor crosses sites of particular sensitivity, a hydrogeological risk assessment will be undertaken to inform a site-specific crossing method statement which will also be agreed with the relevant authorities prior to construction.

5.11.1.4 Subject to those measures, the assessments conclude that none of the effects of the Transmission Assets in relation to geology, hydrogeology and ground condition are considered to be significant.

5.11.1.5 Given the limited adverse effects of the Transmission Assets in relation to geology, hydrogeology and ground conditions, it is considered that the Transmission Assets accord with the requirements of **NPS EN-1 paragraphs 5.4.17 - 5.4.19; 5.4.35 - 5.4.38; 5.4.41; 5.4.42; 5.4.46; 5.4.48; 5.4.50; 5.4.52; 5.11.8; 5.11.17; 5.11.18; 5.11.19; 5.11.28; 5.16.3; 5.16.6 - 5.16.16** and **NPS EN-5 Paragraph 2.9.25**.

5.11.1.6 The Transmission Assets also comply with the NPPF paragraphs 187, 196 and 197; Blackpool Local Plan Part 1: Core Strategy 2012-2027 Policy CS6; Fylde Local Plan to 2032 (incorporating Partial Review) Policies GD9; ENV2; CL1 and DLF1; Preston Local Plan 2012-26 Policies EN10 and EN7; South Ribble Local Plan 2012-2026 Policies G8; G14 and G16; Central Lancashire Adopted Core Strategy Policy 22 and Joint Lancashire Minerals and Waste Local Plan: Site Allocation and Development Management Policies DM11 and M2.

5.11.1.7 A full list of compliance is included in the NPS tracker (document reference J26), the NPPF tracker (document reference J28.1) and the local policies tracker (document reference J28.3).

5.12 Hydrology and flood risk

5.12.1.1 Volume 3, Chapter 2 of the ES (document reference F3.2) sets out the assessment of effects in relation to hydrology and flood risk. This includes effects on onshore surface waterbodies, including rivers and streams.

5.12.1.2 Information on hydrology and flood risk has been collected through a detailed desktop review of existing studies, consultation with relevant stakeholders and datasets and walkover survey. A Flood Risk Assessment (document reference F3.2.3) and a Water Framework Directive assessment (document reference F3.2.1) have been undertaken.

5.12.1.3 The measures proposed by the Applicants include the following, as detailed in the Commitments Register (document reference F1.5.3) and secured through the relevant DCO requirements. These documents have been updated throughout the Examination to address points and concerns raised by relevant stakeholders:.

- The following features will be crossed by trenchless techniques:
  - The following Environment Agency main rivers, Moss Sluice, east of Midgeland Road; along Pegs Lane; Wrea Brook southeast of Cartmell Lane; Dow Brook east of Lower Lane between the A584 and the A583; Middle Pool north of Lund Way.
- Where trenchless techniques are proposed for Environment Agency Main Rivers and ordinary watercourses, specific distances away from banks or flood defences will be used to ensure the export cables remain buried for the operational lifetime of the project.
- Where trenchless techniques are proposed for crossing ordinary watercourses, geomorphological surveys will be undertaken to inform detailed designs prior to construction.
- Construction will be undertaken in accordance with a CoCP, including flood control and measures to maintain and address measures to control runoff and flood risk during construction.
- The implementation of an Outline Pollution Prevention Plan (document reference J1.4) and an Outline Bentonite Breakout Plan (document reference J1.14), as part of the Outline CoCP (document reference J1) will control potential impacts. The Outline CoCP also contains information about drainage during construction to intercept runoff and ensure that discharges are controlled in quality and volume and cause no degradation in water quality classification.
- An Outline Operational Drainage Management Plan for the substation site(s) (document reference J10), including measures to limit discharge rates and attenuate flows to maintain greenfield runoff rates and measures to control surface water runoff.
- The Flood Risk Assessment undertaken demonstrates that the onshore elements of the Transmission Assets meet the requirements of relevant local and national planning policy. Construction measures will be adopted to maintain the existing level of flood protection during this phase. If

applicable, these measures could include scheduling work windows against tide times and briefing site personnel regarding weather conditions, tide times and heights.

- Embedded mitigation measures include a commitment to cross beneath all ordinary watercourses and main rivers using trenchless technology.

5.12.1.4 Details of the proposed drainage strategies are provided in the Outline Operational Drainage Management Plan (document reference J10).

5.12.1.5 Taking into account the measures proposed, the assessment has not identified any significant effects arising from the Transmission Assets during the construction, operation and maintenance or decommissioning phases. In addition, it is concluded that there will be no significant cumulative effects from the Transmission Assets.

5.12.1.6 With the proposed mitigation in place, it is considered that the Transmission Assets accord with the requirements of **NPS EN-1 paragraphs 5.8.13 – 5.8.42; 5.16.3, 5.16.5 – 5.16.16; NPS EN-3 paragraph 2.4.8** and **NPS EN-5 paragraphs 2.3.2** and **2.9.25**.

5.12.1.7 The Transmission Assets also comply with the NPPF paragraph 161 and 182; Blackpool Local Plan Part 1: Core Strategy 2012-2027 Policy CS9; Blackpool Local Plan Part 2: Site Allocations and Development Management Policies Adopted February 2023 Policies D M31; D M33 and D M36; Fylde Local Plan to 2032 (incorporating Partial Review) Policies CL1 and CL2; South Ribble Local Plan 2012-2026 and Central Lancashire Adopted Core Strategy – Local Development Framework Policy 29.

5.12.1.8 A full list of compliance is included in the NPS tracker (document reference J26), the NPPF tracker (document reference J28.1) and the local policies tracker (document reference J28.3).

5.13 Onshore ecology and nature conservation

5.13.1.1 Volume 3, Chapter 3 of the ES (document reference F3.3) sets out the assessment of effects in relation to onshore ecology and nature conservation. Ecology refers to the communities of animals and plants which live in the environment and the relationships that they have with each other and with the physical environment.

5.13.1.2 Information on onshore ecology and nature conservation was collected through a desk study and detailed analysis of data gathered during site-specific surveys and consultation with relevant stakeholders.

5.13.1.3 The Ribble and Alt Estuaries Special Protection Area and Ramsar site are partly within the Intertidal Infrastructure Area. In addition, the Lytham St Annes Dunes SSSI and the Ribble Estuary SSSI are located partly within the Onshore Order Limits. A number of other nationally and locally designated sites have been identified and considered within the assessment.

5.13.1.4 The baseline surveys have identified a range of habitat types of varying quality, including habitats of importance such as coastal and floodplain grazing marsh, coastal saltmarsh, coastal sand dunes, lowland mixed

deciduous woodland, good quality semi-improved grassland, mudflats, lowland fens, lowland meadows and traditional orchard.

5.13.1.5 The identified habitats have the potential to support a range of protected species including bats, great crested newts, sand lizards, otters, fish, aquatic and terrestrial invertebrates and plant species.

5.13.1.6 Mitigation measures adopted by the Applicants include the following, as detailed in the Commitments Register (document reference F1.5.3) and secured through the relevant DCO requirements. These documents have been updated throughout the Examination to address points and concerns raised by relevant stakeholders:.

- Avoidance of designated sites (including SSSIs, Local Nature Reserves, Local Wildlife Sites, Lancashire Wildlife Trust Reserves and Ancient Woodland) and ponds during the site selection process, where practicable. Where possible, unprotected areas of woodland, mature and protected trees (i.e., veteran trees) have been avoided.
- Direct impacts on the designated dunes at Lytham St. Annes will be avoided through the use of direct pipe trenchless construction techniques to pass beneath the dunes.
- Direct impacts on the River Ribble will be avoided through the use of trenchless construction techniques to pass beneath the river.
- Where the cable corridors cross sites of particular ecological sensitivity, hydrogeological risk assessment(s) will be undertaken to inform a site-specific crossing method statement(s) where required.
- Construction will be undertaken in accordance with a CoCP, including measures to maintain and address ecology and nature conservation (including protected species and invasive species).
- A Pollution Prevention Plan (to form part of the CoCP), including good practice pollution control measures and emergency spill procedures.
- An Ecological Management Plan, including measures relating to management and enhancement of habitats and protected or notable species, where relevant.
- The Outline Sand Lizard Mitigation Plan sets out appropriate avoidance and mitigation measures by the Applicants to manage potential impacts to sand lizards during construction. The Applicants confirm that an EPS licence would be obtained (from NE) for works at the landfall site prior to the commencement of construction, and that any incidental handling of sand lizards would be undertaken by the licensed ecologist under the EPS licence (although the potential need for sand lizard handling and relocation is considered very unlikely in reality). Where hedgerows and/or trees require removal, this will be undertaken prior to topsoil removal. Sections of hedgerows and trees which are removed will be replaced using like for like hedgerow species.
- All vegetation requiring removal will be undertaken outside of the bird breeding season, where practicable.

- Construction site lighting will only operate when required and will be positioned and directed to avoid unnecessary illumination to sensitive ecological receptors.
- Provision will be made for badger access in relevant construction areas, when work is not taking place in order to ensure normal movements as far as reasonably possible.
- A mitigation area in the home range of otter populations will be provided east of Savick Brook.

5.13.1.7 There is potential for significant effects from temporary or permanent habitat loss in relation to locally designated Biological Heritage Sites, bats, great crested newts, otters and aquatic invertebrates. In addition, potentially significant effects from habitat fragmentation and isolation have been identified for two Biological Heritage Sites, bats (in relation to a maternity roost), great crested newts, otters and terrestrial invertebrates.

5.13.1.8 In addition, potentially significant effects have been identified associated with potential hydrogeological changes on the Lytham St Annes Dunes SSSI and Lytham St Annes Local Nature Reserve and the sand lizards in this location.

5.13.1.9 Mitigation measures are proposed to address the potential significant effects. With these measures in place, the only significant effect that remains is the partial loss of Mill Brook Valley Biological Heritage Site (and associated habitat). As noted in the Natural England SoCG submitted by the Applicants at Deadline 6 (REP6-179), cable burial depth and impacts on Ground Water Dependant Terrestrial Ecosystem's (GWDTE), i.e. dune slack vegetation at Lytham St Annes Dunes, are still outstanding issues and are not agreed.

5.13.1.10 A number of areas have been identified as having potential for biodiversity benefit, including provision of new habitat and opportunities for enhancement of habitats including waterbodies, hedgerows, and grassland. This will result in some long term beneficial effects. The approach to biodiversity benefit is set out in the outline Biodiversity Benefit Management Plan (document reference J11/F07), which is secured by Requirement 26 of Schedules 2A and 2B to the draft DCO (document reference REP6-013). Other measures to provide biodiversity benefit are also included within the submitted Commitments Register (document reference REP6-042), which would be delivered if the necessary land rights are secured.

5.13.1.11 In terms of onshore ecology and nature conservation, the Transmission Assets have been assessed and comply with the requirements of **NPS EN-1 paragraphs 4.6.6 - 4.6.8, 4.6.10 to 4.6.18; 4.6.1 - 4.6.3; 5.4.17 - 5.4.22; 5.4.25 - 5.4.36; 5.4.41 - 5.4.50** and **5.4.52 - 5.4.55** as well as **NPS EN-3 paragraphs 2.5.2 and 2.8.95 - 2.8.98 and NPS EN-5 paragraphs 2.5.1** and **2.9.25.**

5.13.1.12 The Transmission Assets also comply with the aims and requirements of Chapter 15 of the NPPF (para 187-201); Blackpool Local Plan Part 1: Core Strategy 2012-2027 Policy CS6; Blackpool Local Plan Part 2: Site Allocations and Development Management Policies Adopted February 2023 Policy D M35; Fylde Local Plan to 2032 (incorporating Partial Review) Policy ENV2; Preston Local Plan 2012-26 Policies EN10 and EN11; South Ribble Local

Plan 2012-2026 Policies G7, G8, G13 and G16 and Central Lancashire Adopted Core Strategy – Local Development Framework Policy 18.

5.13.1.13 A full list of compliance is included in the NPS tracker (document reference J26), the NPPF tracker (document reference J28.1) and the local policies tracker (document reference J28.3).

5.14 Onshore and intertidal ornithology

5.14.1.1 Volume 3, Chapter 4 of the ES (document reference F3.4) sets out the assessment of effects in relation to onshore and intertidal ornithology. This includes consideration of the bird population from mean low water springs and landward to Penwortham.

5.14.1.2 The assessment of effects has been informed by information on breeding, wintering and migratory birds from a desk based review of existing studies and datasets and also through site-specific surveys, including two years-worth of breeding, wintering and migratory bird surveys as well as consultation with relevant stakeholders.

5.14.1.3 Mitigation measures proposed by the Applicants include the following, as detailed in the Commitments Register (document reference F1.5.3) and secured through the relevant DCO requirements. These documents have been updated throughout the Examination to address points and concerns raised by relevant stakeholders:.

- Avoidance of designated sites (including SSSIs, Local Nature Reserves, Local Wildlife Sites, Lancashire Wildlife Trust Reserves, Ancient Woodland and Royal Society for the Protection of Birds (RSPB) Reserves) during the site selection process, where practicable. Where possible, unprotected areas of woodland, mature and protected trees (i.e., veteran trees) have been avoided.
- Direct impacts on the designated dunes at Lytham St. Annes will be avoided through the use of direct pipe trenchless construction techniques to pass beneath the dunes.
- Direct impacts on the River Ribble will be avoided through the use of trenchless construction techniques to pass beneath the river.
- Construction will be undertaken in accordance with a CoCP, including measures to maintain and address ecology and nature conservation (including protected species and invasive species).
- An Ecological Management Plan, including details of mitigation areas for supplementary feeding of pink-footed goose and whooper swan during the core wintering bird period (November to March, inclusive). In addition, three key areas have been identified where further mitigation can be applied to reduce and offset any adverse effects on the intertidal and terrestrial wader, goose and swan features.
- A Wildlife Hazard Management Plan, including identifying potential hazards related to changes in bird abundance, distribution, and behaviour, as well as proposed wildlife hazard mitigation measures. Additionally, the draft Wildlife Habitat Attractants Risk Assessment, an

appendix to Volume 3, Chapter 11: Aviation and Radar, sets out the bird species with potential to increase bird strike within Blackpool Airport and Warton Aerodrome's 13km wildlife hazard management zones, and management measures to control bird attraction.

- A Breeding Bird Protection Plan will set out mitigation measures such as vegetation clearance in winter (e.g., hedgerows), pre-construction breeding bird survey, appropriate protection zones upon confirmation of nest building/breeding taking place of key protected or sensitive species.
- All vegetation requiring removal will be undertaken outside of the bird breeding season. If this is not reasonably practicable, the vegetation requiring removal will be subject to a nesting bird check by a suitably qualified ecological clerk of works.
- Construction activities associated with the offshore cable pull in will be undertaken in accordance with the Outline Offshore Cable Specification and Installation Plan (document reference J15). This will restrict the Applicants to completing one cable pull in (a maximum of five weeks) per wintering season (i.e. during the months of November – February, inclusive), unless otherwise agreed with the MMO, in consultation with Natural England.

5.14.1.4 It is noted that several areas have been identified as having potential for biodiversity benefit, including provision of opportunities for enhancement for birds. This will result in a long-term beneficial effect, which may be significant. An outline Biodiversity Benefit Management Plan has been developed setting out the Applicants' approach and where opportunities for any enhancement are proposed (document reference J11). Other measures to provide biodiversity benefit are also included within the submitted Commitments Register (document reference F1.5.3), which would be delivered if the necessary land rights cannot be secured.

5.14.1.5 Taking into account the measures proposed, the assessment has not identified any significant effects arising from the Transmission Assets during the construction, operation and maintenance or decommissioning phases. Cumulative effects with other developments have been assessed. Overall, the assessment has not identified any significant cumulative effects.

5.14.1.6 In terms of onshore and intertidal ornithology, the Transmission Assets have been assessed and comply as required with **NPS EN-1 paragraphs 5.4.17 - 5.4.22; 5.4.25 - 5.4.36; 5.4.39; 5.4.41 - 5.4.50; 5.4.52 -5.4.55; NPS EN- 5 paragraphs 2.5.1** and **2.9.6** as well as Chapter 15 of the NPPF (para 187-201); Blackpool Local Plan Part 1: Core Strategy 2012-2027 Policy CS6; Blackpool Local Plan Part 2: Site Allocations and Development Management Policies Policy D M35; Fylde Local Plan to 2032 (incorporating Partial Review) (Adopted December 2021) Policy ENV2; Preston Local Plan 2012-26 Policies EN3; EN10 and EN11; South Ribble Local Plan 2012-2026 Policies G7, G8 and G16 and Central Lancashire Adopted Core Strategy – Local Development Framework Policies 18 and 22.

5.14.1.7 A full list of compliance is included in the NPS tracker (document reference J26), the NPPF tracker (document reference J28.1) and the local policies tracker (document reference J28.3).

5.15 Historic environment

5.15.1.1 Volume 3, Chapter 5 of the ES (document reference F3.5) sets out the assessment of effects in relation to the historic environment. Historic environment encompasses all aspects of the past including buried archaeological remains, deposits of geoarchaeological or palaeoenvironmental interest (i.e., deposits containing information about past environments and human interaction with these past environments), built heritage and the character of the historic landscape.

5.15.1.2 The assessment of effects on the historic environment has been informed by a combination of desk-based research, site visits and site-specific fieldwork including geophysical survey and trial trenching. Consultation was undertaken with relevant stakeholders to ensure that the data sources examined thus far were the appropriate ones and that the archaeological fieldwork is being undertaken in accordance with best practice.

5.15.1.3 Mitigation measures proposed by the Applicants include the following, as detailed in the Commitments Register (document reference F1.5.3 and secured through the relevant DCO requirements. These documents have been updated throughout the Examination to address points and concerns raised by relevant stakeholders:.

- A range of sensitive historical areas have been avoided where possible during the site selection process, including listed buildings, scheduled monuments, registered parks and gardens conservation areas and non-designated built heritage assets.
- An Onshore and Intertidal Written Scheme(s) of Investigation will provide details on the surveys and archaeological mitigation in advance for each stage of work, any ground breaking works and during construction.
- Construction will be undertaken in accordance with a CoCP, including measures to maintain and address the historic environment.

5.15.1.4 All of the impacts on designated heritage assets identified with regard to the Transmission Assets represent less than substantial harm to the significance of those assets. None of the identified impacts would represent substantial harm as this is a particularly high test as explained in the Planning Practice Guidance (Department for Levelling Up, Housing and Communities and Ministry of Housing, Communities and Local Government, 2023).

5.15.1.5 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. There would be no cumulative effects from the Transmission Assets alongside other projects/plans and no potential transboundary impacts have been identified with regard to effects of the Transmission Assets.

5.15.1.6 In terms of historic environment, the Transmission Assets have been assessed as required by the NPS EN-1 paragraphs 5.9.10 - 5.9.36 as well as the NPPF paragraphs 207 - 209; 212 -216; Blackpool Local Plan Part 2: Site Allocations and Development Management Policies, Policies D M28 and D M30; Fylde Local Plan to 2032 (incorporating Partial Review) (Adopted

December 2021) Policy ENV5; Preston Local Plan 2012-26 Policies EN8 and South Ribble Local Plan 2012-2026 Policy G17.

5.15.1.7 A full list of compliance is included in the NPS tracker (document reference J26), the NPPF tracker (document reference J28.1) and the local policies tracker (document reference J28.3).

5.16 Land use and recreation

5.16.1.1 Volume 3, Chapter 6 of the ES (document reference F3.6) sets out the assessment of effects in relation to the existing land uses, including agriculture and recreation, which may be directly or indirectly affected during the construction, operation and maintenance and decommissioning phase of the Transmission Assets. The assessment considered the potential impacts on agricultural land quality, land holdings and recreational resources (e.g., coastal areas, public open spaces, golf courses, caravan parks, stables), including public rights of way (e.g., footpaths, bridleways) and other promoted routes, such as National Cycle Routes and Long Distance Paths.

5.16.1.2 Existing land uses were identified through a combination of desk-based analysis and site-specific surveys. Desk based analysis of existing studies and datasets were used to identify the quality of agricultural land, the types and patterns of soils, farm holdings and recreational resources, including public rights of way. In addition, soil surveys were also undertaken in 2024 to confirm the quality and characteristics of agricultural land within the Onshore Order Limits.

5.16.1.3 Mitigation measures proposed by the Applicants include the following, as detailed in the Commitments Register (document reference F1.5.3) and secured through the relevant DCO requirements. These documents have been updated throughout the Examination to address points and concerns raised by relevant stakeholders:

- Construction will be undertaken in accordance with a CoCP, including measures to maintain and address soil management and recreation. It also includes that farm access routes between fields within a farm holding will be maintained (where reasonably practicable), or alternative routes agreed with the land holder to enable the continued operation of agricultural land holdings during the construction phase, where possible.
- Installation of cables at Blackpool Road Playing Fields would be by trenchless techniques, avoiding the need for open trenching through this area and alternative pitch facilities will be secured via a section 106 agreement with Fylde Borough Council (S_D4_16).
- Construction will be undertaken in accordance with the Public Rights of Way Management Plan to minimise the disturbance to rights of way, where practicable.
- Construction will be undertaken in accordance with the Soil Management Plan to characterise and manage soil materials during construction. Soil types would be determined via site-specific survey work with specific measures included to identify and mitigate peat deposits.

- An Outline Open Space Management Plan has been appended to the Outline Public Right of Way Management Plan (document reference J1.5), which includes measures to minimise potential impacts to the users of Lytham St Annes beach and Blackpool Road Recreation Ground.
- The Outline PRoW Management Plan sets out the approach to managing impacts on PRoW during construction of the Transmission Assets.

5.16.1.4 Temporary adverse effects on public rights of way, including footpaths and bridleways arising from disruption and reduced access during construction of the Transmission Assets as well as permanent adverse effects as a result of the permanent loss of Best and Most Versatile agricultural land would occur during construction of the Transmission Assets. However the Applicants' site selection approach demonstrated that it was not possible to avoid BMV and that only the lowest quality (Grade 3b) is permanently impacted, from construction of the substations.

5.16.1.5 In terms of land use and recreation, the Transmission Assets have been assessed as required by NPS EN-1 paragraphs 5.11.1; 5.11.4; 5.11.6; 5.11.8 - 5.11.15; 5.11.23 - 5.11.26; 5.11.29 - 5.11.35 and 5.11.38 as well as NPS EN-5 paragraphs 2.2.11; 2.9.19 and 2.9.25.

5.16.1.6 The Transmission Assets also comply with paragraphs 98; 104, and 105 of the NPPF; Blackpool Local Plan Part 1: Core Strategy 2012-2027 Policies CS6; Blackpool Local Plan Part 2: Site Allocations and Development Management Policies Adopted February 2023 Policies D M35 and D M41; Fylde Local Plan to 2032 (incorporating Partial Review) (Adopted December 2021) Policies GD4; EC6; DLF1; HW2; HW3; T4 and ENV3; Preston Local Plan 2012-26 Policies EN2 and EN3; South Ribble Local Plan 2012-2026 Policies G4; G7; G8 and G12 and Central Lancashire Adopted Core Strategy – Local Development Framework Policies 18; 24 and 31.

5.16.1.7 A full list of compliance is included in the NPS tracker (document reference J26), the NPPF tracker (document reference J28.1) and the local policies tracker (document reference J28.3).

5.17 Traffic and transport

5.17.1.1 Volume 3, Chapter 7 of the ES (document reference F3.7) sets out the assessment of effects in relation to traffic and transport. Traffic and transport relate to the movement demand generated by the Transmission Assets and its effects upon other road users and surroundings.

5.17.1.2 Mitigation measures proposed by the Applicants include the following, as detailed in the Commitments Register (document reference F1.5.3) and secured through the relevant DCO requirements. These documents have been updated throughout the Examination to address points and concerns raised by relevant stakeholders:.

- A Construction Traffic Management Plan to set standards and procedures for:

  - managing the numbers and routing of Heavy Goods Vehicles during the construction phase;
  - managing the movement of employee traffic during the construction phase;
  - measures to manage the safe passage of Heavy Goods Vehicle traffic via the local highway network; and
  - details of localised road improvements if and where these may be necessary to facilitate safe use of the existing road network.
- Temporary access points from the highway will be installed to facilitate vehicular access from the road during construction. The access points will be constructed in line with Lancashire County Council's requirements, relevant appropriate standards and in accordance with the principles established in the Outline Construction Traffic Management Plan.
- Haul road(s) will be installed within the temporary working area the onshore export cable corridor and 400 kV grid connection corridor to minimise impacts during construction.

5.17.1.3 Overall, it is concluded that there will be no significant effects or cumulative significant effects arising from the Transmission Assets during the construction, operations and maintenance or decommissioning phases.

5.17.1.4 In terms of traffic and transport, the Transmission Assets have been assessed as required by **NPS EN-1 paragraphs 5.14.1 - 5.4.21**; Paragraphs 109, 115 - 118 of the NPPF as well as Blackpool Local Plan Part 2: Site Allocations and Development Management Policies Adopted February 2023 Fylde Local Plan to 2032 (incorporating Partial Review) (Adopted December 2021) Policies INF1; T1; T4; Preston Local Plan 2012-26 Policy ST2; South Ribble Local Plan 2012-2026 Policy G17 and Central Lancashire Adopted Core Strategy – Local Development Framework Policy 28.

5.17.1.5 A full list of compliance is included in the NPS tracker (document reference J26), the NPPF tracker (document reference J28.1) and the local policies tracker (document reference J28.3).

5.18 Noise and vibration

5.18.1.1 Volume 3, Chapter 8 of the ES (document reference F3.8) sets out the assessment of effects in relation to noise and vibration. Unwanted noise and vibration can lead to adverse impacts on existing residential amenity and public health. As such, it is important that the impacts of noise and vibration predicted from the construction and operation of new developments be assessed and mitigated as far as reasonably practicable.

5.18.1.2 The existing sound environment has been characterised via a desk-based review of existing studies and datasets and site-specific surveys where long term noise monitoring provided data for the determination of impact assessment criteria, including consultation with the relevant local authorities.

5.18.1.3 Mitigation measures proposed by the Applicants include the following, as detailed in the Commitments Register (document reference F1.5.3 and

secured through the relevant DCO requirements. These documents have been updated throughout the Examination to address points and concerns raised by relevant stakeholders:.

- Core working hours for the construction of the landfall and onshore elements of the Transmission Assets will be as follows:
  - Monday to Friday: 07:00 - 19:00 hours, Monday to Saturday 07:00-13:00; and
  - up to one hour before and after core working hours for mobilisation ('mobilisation period').

    Activities carried out during the mobilisation period will not generate significant noise levels (such as piling, or other such noisy activities).

    In circumstances outside of core working practices, specific works may have to be undertaken outside the core working hours.
- All trenchless crossings will be undertaken by non-impact methods such as Horizontal Directional Drilling (or other trenchless techniques including micro tunnelling and direct pipe), excluding preparatory works, in order to minimise construction noise and vibration beyond the immediate location of works.
- Based on noise modelling results, where noise has the potential to cause significant adverse effects, mufflers and acoustic barriers will be used, where practicable.
- Construction will be undertaken in accordance with a CoCP, including a Construction Noise and Vibration Management Plan with measures to mitigate noise from construction activities associated with the Transmission Assets.
- Construction to be undertaken in accordance with the Construction Traffic Management Plan.
- Operational noise from the onshore substations to be controlled through identified noise limits and a scheme implemented to manage and monitor noise during their operation. This is secured through Requirement 18 of Schedules 2A and 2B of the draft DCO.
- Best Practicable Means (as defined in section 72 of the Control of Pollution Act 1974 and section 79 of the Environmental Protection Act 1990) will be implemented during the construction, operation, maintenance aspects of the Transmission Assets, where appropriate, to ensure that noise levels are minimised within all reasonably foreseeable circumstances.

5.18.1.4 Overall, it is concluded that there will likely be no significant effects arising from the Transmission Assets during the construction, operation and maintenance or decommissioning phases once mitigation is applied. There will be no significant cumulative effects from the Transmission Assets alongside other projects/plans and no potential transboundary impacts have been identified in regard to effects of the Transmission Assets.

5.18.1.5 There are considered to be no significant noise and vibration effects and therefore the Transmission Assets accord with **NPS EN-1 paragraphs 4.15.5 - 4.15.7 and 5.12.6 - 5.12.18** as well as **NPS EN-5 paragraphs 2.9.37 - 2.9.39; and2.9.43**.

5.18.1.6 The Transmission Assets also accord with Paragraphs 187 and 198 of the NPPF; Blackpool Local Plan Part 1: Core Strategy 2012-2027 Policies CS7 and CS10; Blackpool Local Plan Part 2: Site Allocations and Development Management Policies Adopted February 2023 Policy D M36; Fylde Local Plan to 2032 (incorporating Partial Review) (Adopted December 2021) Policy CL3; Preston Local Plan 2012-26 Policy AD1; South Ribble Local Plan 2012-2026 Policy B1 and Central Lancashire Adopted Core Strategy – Local Development Framework Policy 18.

5.18.1.7 A full list of compliance is included in the NPS tracker (document reference J26), the NPPF tracker (document reference J28.1) and the local policies tracker (document reference J28.3).

5.19 Air quality

5.19.1.1 Volume 3, Chapter 9 of the ES (document reference F3.9) sets out the assessment of effects in relation to air quality. The term air quality is a measure used to describe the level of pollutants present within the air.

5.19.1.2 Existing air quality data has been obtained from available sources, including local monitoring studies and national or government data sources, including the Department for Environment, Food & Rural Affairs (Defra) UK AIR, Air Information Source national pollution maps.

5.19.1.3 Mitigation measures proposed by the Applicants include the following, as detailed in the Commitments Register (document reference F1.5.3 and secured through the relevant DCO requirements. These documents have been updated throughout the Examination to address points and concerns raised by relevant stakeholders:.

- Construction will be undertaken in accordance with a CoCP, including best practice measures for air quality and dust management.
- Construction to be undertaken in accordance with the Construction Traffic Management Plan.

5.19.1.4 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, including in relation to designated sites. There would also be no significant cumulative effects from dust and construction traffic related emissions arising from the Transmission Assets alongside other projects/plans and no potential transboundary impacts.

5.19.1.5 Given the limited predicted effects, it is considered that the Transmission Assets accord with NPS EN-1 paragraphs 4.15.5 – 4.15.7 and 5.12.7 - 5.12.18; NPS EN-3 paragraphs 2.5.2; as well as NPS EN-5 paragraphs 2.9.37 - 2.9.38.

5.19.1.6 The Transmission Assets also comply with Paragraphs 8; 198 and 199, of the NPPF; Blackpool Local Plan Part 1: Core Strategy 2012-2027 Policies CS7 and CS10; Blackpool Local Plan Part 2: Site Allocations and Development Management Policies Adopted February 2023 Polic D M36; Fylde Local Plan to 2032 (incorporating Partial Review) (Adopted December 2021) Policy CL3; Preston Local Plan 2012-26 Policies AD1(a); South Ribble Local Plan 2012-2026 Policy B1and Central Lancashire Adopted Core Strategy – Local Development Framework Policy 28. A full list of compliance is included in the NPS tracker (document reference J26), the NPPF tracker (document reference J28.1) and the local policies tracker (document reference J28.3).

5.20 Landscape and visual resources

5.20.1.1 Volume 3, Chapter 10 of the ES (document reference F3.10) sets out the assessment of effects in relation to landscape and visual impacts. Landscape and visual resources refer to the existing character and physical elements of the landscape, areas designated for their scenic or landscape related qualities, and / or views from publicly accessible locations such as settlements, transport routes, and public rights of way.

5.20.1.2 Representative viewpoints have been selected to represent a broad range of locations and sensitive visual receptors across the onshore substations' 5 km radius study area the study area and a single location at the landfall. Fieldwork was undertaken to verify the visual receptors and representative viewpoint locations and photography captured. Offshore, there will be no above sea-level structures as part of the application for development consent for the Transmission Assets, therefore, seascape character and marine based visual receptors were scoped out.

5.20.1.3 Mitigation measures proposed by the Applicants include the following, as detailed in the Commitments Register (document reference F1.5.3) and secured through the relevant DCO requirements. These documents have been updated throughout the Examination to address points and concerns raised by relevant stakeholders:

- The cables will completely buried underground for the entire length. No overhead line or pylons will be installed as part of the Transmission Assets
- The route of the onshore export cables and the 400 kV grid connection cables have been designed to avoid crossing woodlands and areas of groups of trees, wherever possible.
- Where hedgerows and/or trees require removal, this will be undertaken prior to topsoil removal. Sections of hedgerows and trees which are removed will be appropriately mitigated for and reinstated in the first planting season following the completion of construction. No trees would be re-planted within or near the permanent cable easements.
- Joint bays will be completely buried, with the land above reinstated. An inspection cover for link boxes will be provided on the surface, level with

the ground to minimise impacts on existing land use and enable access during operation and maintenance phase.

- Construction will be undertaken in accordance with a CoCP, including measures to maintain and address impacts on landscape and visual resources.
- Construction will be undertaken in accordance with the Public Rights of Way Management Plan to minimise the disturbance to rights of way, where practicable.
- An Outline Landscape Management Plan (oLMP) sets out the framework for landscape design, planting, and management for all components of the Transmission Assets. It provides outline measures to guide the preparation of detailed landscape management plans, ensuring successful establishment of planting and landscape mitigation following construction as well as ongoing maintenance to ensure the effectiveness of the mitigation.

5.20.1.4 The accompanying Outline Design Principles (oDP) document (REP6-109) provides a central, clear, and enforceable framework to guide the evolution of detailed design post-consent, in support of the DCO and its requirements. The oDP documents the suite of Project Level Design Principles and Design Codes that will guide the detailed design post-consent, ensuring consistency with the parameters, embedded mitigation and commitments assessed in the ES.

5.20.1.5 A range of potential daytime and night time impacts upon landscape and visual resources associated with the construction, operation and maintenance and decommissioning phases of the Transmission Assets have been identified, ranging from major to negligible. Overall, it is concluded that the only significant effects that would arise from the Transmission Assets during either the construction, operation and maintenance or decommissioning phases in the following instances:

- Temporary effects on landscape character as a result of construction elements of the Transmission Assets at the landfall:
  - LCA 19a: Coastal Dunes – Fylde Coastal Dunes.
- Effects on landscape character as a result of substations.
  - LCA 15d: Coastal Plain – Fylde – temporary construction and short term operation year 1 before landscape mitigation planting has established.
- Effects on visual amenity as a result of substations.
  - Representative Viewpoint 1: bridleway BW0505016 south of Morgan onshore substation site – temporary construction and short term operation year 1 before landscape mitigation planting has established.
  - Representative Viewpoint 3: bridleway BW0505016 west of Morgan onshore substation – temporary construction and short term

operation year 1 before landscape mitigation planting has established.

  - Representative Viewpoint 6: footpath FP050503 south of Morecambe onshore substation site – temporary construction and short term operation year 1 before landscape mitigation planting has established.
  - Sequential effects on people using PRoW BW0505016, FP050503 and FP050504 – temporary construction, operation year 1 and long term year 15 when landscape mitigation planting has matured.

- Temporary effects on visual amenity as a result of onshore cable/landfall activities:
  - People using beach – temporary construction.
  - People using Blackpool Road Recreation Ground – temporary construction.
  - People using PRoW BW0502012, BW0502013, BW0502016, BW0503012, FP050302, FP05010011, FP050304, FP050305, FP050502, BW0509012, FP00905, FP070907 and FP0709010 – temporary construction.
  - People using National Cycle Route 62 at Hillock Lane – temporary construction.
  - Occupiers of residential properties at Bridge Farm, Bridge Hall Farm, Moss Side Farm, The Old Dairy, Hillock Cross Farm, Savick Brook Farm and Marsh Farm – temporary construction.

5.20.1.6 The only long- term significant effects as a result of the Transmission Assets on visual amenity would for users of the linked public rights of way immediately adjacent and near to the Morgan and Morecambe onshore substation sites.

5.20.1.7 No other significant long term operational effects on landscape character or visual receptors have been identified due to the screening effects of the indicative landscape strategy which would progressively reduce effects over time.

5.20.1.8 It is important to note, in conclusion, the approach of the LVIA to the significance context, within the context of the wider ES, remains robust and consistent with both the EIA Regulations and accepted industry guidance, namely the Guidelines for Landscape and Visual Impact Assessment (GLVIA3)The threshold of moderate adverse and below is a typical point at which landscape and visual effects are not considered significant. Paragraph 10.11.4.4 of the LVIA clarifies that effects assessed as being of ‘moderate’ significance are not automatically treated as EIA significant, but this does not mean they are disregarded and such effects are given appropriate weight in the assessment process.

5.20.1.9 In light of the nature of the effects identified above and the approach of the LVIA to the significance context, it is considered that the Transmission Assets, with the mitigation in place, accords with the requirements of **NPS EN-1 paragraphs 4.6.13; 4.7.2; 4.7.6; ; 5.10.4 - 5.10.6; 5.10.12 – 5.10.17;**

5.10.19 - 5.10.22; 5.10.24 – 5.10.28; ; 5.11.30 – 5.11.31 as well as **NPS EN-3 paragraphs 2.3.6; 2.5.2;; 2.8.352 and NPS EN-5 paragraphs 2.2.8 – 2.2.10; 2.9.9; 2.9.18; 2.9.22; 2.9.25;** and **2.14.2**.

5.20.1.10 The Transmission Assets also comply with Paragraphs 8; 98, 104, 105, 135; 137; 139, 142; 153-160 and 187 – 189 of the NPPF; UK Marine Policy Statement paragraphs 2.6.5.1 - 2.6.5.4; North West Inshore and North West Offshore Marine Plan Policies NW-CE-1; NW-CO-1; NW-SCP-1; Blackpool Local Plan Part 1: Core Strategy 2012-2027 Policy CS10; Blackpool Local Plan Part 2: Site Allocations and Development Management Policies Adopted February 2023 Policies D M21 Fylde Local Plan to 2032 (incorporating Partial Review) (Adopted December 2021) Policy CL3, ENV1; ENV5; GD2; GD3 and GD7; Preston Local Plan 2012-26 Policy EN3; South Ribble Local Plan 2012-2026 Policy G1; G13 and G17 and Central Lancashire Adopted Core Strategy – Local Development Framework Policies 16; 21 and 28. A full list of compliance is included in the NPS tracker (document reference J26), the NPPF tracker (document reference J28.1) and the local policies tracker (document reference J28.3).

5.21 Aviation and radar

5.21.1.1 Volume 3, Chapter 11 of the ES (document reference F3.11) sets out the assessment of effects in relation to aviation and radar. Aviation and radar refers to the stakeholders/receptors that operate in the UK and international airspace, interacting with each other, the air traffic management provided and the relationship/effects of the physical environment. This assessment was undertaken in compliance with paragraph 5.5.37 and 5.5.40 of NPS EN-1.

5.21.1.2 The aviation receptors around the Transmission Assets have been characterised via a desk study utilising UK and international aviation guidance material and site-specific study of regional aviation and stakeholder engagement. The Applicants have sought to develop the Transmission Assets proposals collaboratively alongside aviation stakeholders, having consulted with stakeholders from the pre-application stage to develop the scope of the environmental impact assessment, agreeing mitigation measures where required and in proposing and agreeing suitable DCO requirements to secure such measures.

5.21.1.3 The information on aviation and radar was collected through detailed review of existing guidance and datasets. This included defining Military Practice and Exercise Areas, aerodromes, flight procedures, other aviation communications, navigation and surveillance infrastructure, helicopter main route indicators and other low flying operations such as Ministry of Defence and helicopter search and rescue activities.

5.21.1.4 Several discrete operators utilise the airspace in the vicinity the Transmission Assets. The Transmission Assets Onshore Order Limits encompass Blackpool Airport and are located within 15 km of the boundary of Warton Aerodrome.

5.21.1.5 The Applicants have given detailed consideration to aviation, and specifically the potential risk of bird strike, and have designed the Transmission Assets in order to minimise adverse impacts on the safety of aerodromes in

accordance with paragraph 5.5.50 of EN-1. In order to ensure any potential impacts are reduced, no construction works within the operational (i.e. airside) boundary of Blackpool Airport will commence until the Civil Aviation Authority has approved and inspected the works. In addition, the draft DCO contains a standalone requirement which secures delivery of a detailed Wildlife Hazard Management Plan which will require approval by the Ministry of Defence, BAE Systems and Blackpool Airport.

5.21.1.6 With the mitigation measures in place there will be no significant effects arising from the Transmission Assets during the construction, operation and maintenance or decommissioning phases. It is concluded that there will be no significant cumulative effects from the Transmission Assets alongside other projects/plans.

5.21.1.7 Taking account of the mitigation measures secured by requirements 4, 5 and 27, effects are not considered to be significant therefore the Transmission Assets accord with the requirements of **NPS EN-1 paragraph 5.5.5; 5.5.10; 5.5.11; 5.5.34; 5.5.37; 5.5.39 - 5.5.40; 5.5.44; 5.5.49, and 5.5.60 as well as NPS EN-3 paragraphs 2.8.50.**

5.21.1.8 The Applicants would note that throughout the examination, concerns were raised by the Examining Authority with regard to the Applicants' compliance with aviation and bird strike policy. A technical note was therefore submitted at Deadline 5 setting out the specific compliance with NPS policy in relation to bird strike – see REP5-133. In addition, a joint statement was prepared between the Applicants and Blackpool Airport, which addresses the parties agreed position in relation to compliance with various points of NPS aviation policy and was submitted at Deadline 6 (REP6-181).

5.21.1.9 The Transmission Assets also comply with the Fylde Local Plan to 2032 (incorporating Partial Review) (Adopted December 2021) Policies T2; T3 and CL3. A full list of compliance is included in the NPS tracker (document reference J26), the NPPF tracker (document reference J28.1) and the local policies tracker (document reference J28.3).

5.22 Climate change

5.22.1.1 Volume 4, Chapter 1 of the ES (document reference F4.1) sets out the assessment of effects in relation to climate change. Climate change in this context refers to the long-term shifts in temperatures and weather patterns that are fundamentally driven by human activities.

5.22.1.2 The assessment considers the impacts and effects of the Transmission Assets on climate change during the construction, operation and maintenance and decommissioning phases.

5.22.1.3 The greenhouse gas emissions arising from the Transmission Assets have been characterised by a series of desk-based assessments and articles using published data to determine both the impact of the Transmission Assets on climate change and the impact of climate change on the Transmission Assets. The potential risks to the Transmission Assets from a changing climate have also been assessed.

5.22.1.4 Mitigation measures proposed by the Applicants include the following, as detailed in the Commitments Register (document reference F1.5.3 and secured through the relevant DCO requirements. These documents have been updated throughout the Examination to address points and concerns raised by relevant stakeholders:.

- The Greenhouse Gas Reduction Strategy outlines options to reduce construction-related emissions.

5.22.1.5 The purpose of the Transmission Assets is to connect the Morgan Offshore Wind Project and Morecambe Offshore Windfarm to the National Grid. This will contribute to:

- 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.

5.22.1.6 The projects, therefore, have an important part to play in securing the timely delivery of the Government's renewable energy strategy and achieving legally binding emissions reduction targets.

5.22.1.7 Further details of the need for the Morgan Offshore Wind Project, the Morecambe Offshore Windfarm and the Transmission Assets are provided in **section 4**.

5.22.1.8 The Transmission Assets would enable the use of the renewable electricity generated by the Generation Assets through providing the connection to the National Grid for these two nationally significant offshore wind farms. This allows the displacement of fossil fuels which would lead to a significant beneficial effect.

5.22.1.9 Overall, it is concluded that there will be a significant beneficial cumulative effect from the Transmission Assets, when considered together with the Generation Assets. This arises from the generation of renewable energy by the two offshore wind farms, leading to avoidance of emissions due to the displacement of higher emitting electricity generation sources.

5.22.1.10 The Transmission Assets and the Generation Assets would therefore contribute to meeting the national renewable energy and climate change policy and international obligations set out in **sections 3 and 4** of this Planning Statement. Overall, the Transmission Assets comply with **NPS EN-1 paragraphs 3.5.1; 4.10.6 - 4.10.19; 5.3.5 - 5.3.12; NPS EN-3 section 1.6 and paragraph 2.4.8 and NPS EN-5 paragraphs 2.3.2** and **2.3.3**.

5.22.1.11 The Transmission Assets also comply with the aims and requirements of Paragraph 159 of the NPPF; the North West Inshore and North West Offshore Marine Plan Policies NW-CC-2 and NW-AIR-1; Blackpool Local Plan Part 1: Core Strategy 2012-2027 Fylde Local Plan to 2032 (incorporating Partial Review) (Adopted December 2021) South Ribble Local

Plan 2012-2026 Core Strategy objectives and Central Lancashire Adopted Core Strategy – Local Development Framework Policy 28.

5.22.1.12 A full list of compliance is included in the NPS tracker (document reference J26), the NPPF tracker (document reference J28.1) and the local policies tracker (document reference J28.3).

5.23 Socio-economics

5.23.1.1 Volume 4, Chapter 2 of the ES sets out the assessment of effects in relation to socio-economics. The assessment within the ES of the potential impact of the Transmission Assets on socio-economics considered the following categories.

- Economic: assessing the potential employment and Gross Value Added (GVA) impacts associated with Transmission Assets and the associated impacts on local employment opportunities. Also considered were the potential economic impact of changes to aviation activities (at Blackpool Airport and Blackpool Airport Enterprise Zone).
- Social: assessing the potential impacts of the workforce associated with the Transmission Assets on housing, accommodation and population (including local services).
- Tourism: assessing the potential indirect impacts associated with visual amenity, overnight accommodation and recreation on tourism.

5.23.1.2 The socio-economics impact assessment considers the local economies and populations which are located at a number of spatial levels that might be affected by the Transmission Assets. This includes the areas closest to offshore and onshore activities as well as other important locations that may be used to support the construction, operation and maintenance and decommissioning activities related to the Transmission Assets (e.g., laying cables offshore, installing onshore substation etc.). These areas are primarily related to the regions where potential support facilities (i.e., ports) within the relevant spatial levels are located and the onshore substation which will be located at Penwortham.

5.23.1.3 Mitigation measures proposed by the Applicants includes the following, as detailed in the Commitments Register (document reference F1.5.3 and secured through the relevant DCO requirements. These documents have been updated throughout the Examination to address points and concerns raised by relevant stakeholders:

- Employment and Skills Plan(s) will detail how the Applicants will engage with local workers and training providers for anticipated employment opportunities associated with the Transmission Assets.

5.23.1.4 The assessment has taken into consideration the measures within the Outline Skills and Employment Plan (document reference J10) included in the application. The actions presented within the Outline Plan will form the basis of a post-consent Skills and Employment Plan, which will be adopted by the Applicants to help develop and support the economic benefits

associated with the Transmission Assets in relation to skills and employment within the offshore wind sector.

5.23.1.5 There will be no significant effects arising from the Transmission Assets during the construction, operation and maintenance or decommissioning phases, and no potential transboundary impacts have been identified in regard to effects of the Transmission Assets.

5.23.1.6 The effects identified are considered to be beneficial. There will be significant beneficial cumulative effects during construction, operation and maintenance on economic receptors including employment and Gross Value Added. The Transmission Assets will be delivered alongside the two associated generation projects for Morgan and Morecambe, each of which are nationally significant infrastructure projects in their own right, and cannot be delivered without the respective elements of the Transmission Assets. The potential exists for the development of these projects to have a transformative effect on the offshore wind sector in North West England and across the UK in providing a combined 2GW of renewable energy generation capacity.

5.23.2 Local tourism

5.23.2.1 Paragraph 5.13.2 of NPS EN-1 requires that "Where the project is likely to have socio-economic impacts at local or regional levels, the applicant should undertake and include in their application an assessment of these impacts as part of the ES (see Section 4.2)" (emphasis added). Paragraphs 5.13.3 - 5.13.6 detail the advised scope of any such assessment.

5.23.2.2 In accordance with paragraph 5.13.2 of NPS EN-1 the Applicants undertook an assessment of potential socio-economic effects (including tourism) at a regional level within section 2.11 and 2.12 of ES Volume 4, Chapter 2: Socio-economics (document reference F4.2).

5.23.2.3 Prior to this, the Applicants had published a Preliminary Environmental Information Report (PEIR) as part of the statutory consultation, which included an assessment of potential socio-economic effects (including tourism) at the regional level.

5.23.2.4 As part of this statutory consultation for the Transmission Assets, no responses were received from local authorities or other stakeholders on the matter of the spatial scale at which potential tourism effects had been assessed, or any other comments to suggest that there was concern regarding the Transmission Assets' potential to have a likely significant effect on tourism at a local level.

5.23.2.5 Subsequently, the full Environmental Statement submitted as part of the DCO application was accepted for examination by the Planning Inspectorate.

5.23.2.6 However, as part of the DCO examination for the Transmission Assets, some local planning authorities have made comments in relation to the spatial scale at which potential effects on tourism have been assessed within ES Volume 4, Chapter 2: Socio-economics (document reference F4.2), pursuant to paragraph 5.13.2 of NPS EN-1.

5.23.2.7 The Applicants maintain that Paragraph 5.13.2 (and therefore 5.13.3 - 5.13.6) of NPS EN-1 was complied with, on the basis that an assessment would only

be required as part of the application where it was considered prior to the application stage that the project would be likely to have significant socio-economic effects (including tourism) at a local level – there was no evidence (either from the Applicants' own assessments, or as part of any submission from the local planning authorities in response to the statutory consultation or other pre-application engagement) at or prior to the application stage that such an impact would be likely, therefore no assessment was required or undertaken at application stage.

5.23.2.8 Notwithstanding and without prejudice to the above, further to concerns being raised during the examination process, the Applicants have undertaken a Local Tourism Assessment which can be found at document reference (S_D5_8). Potential effects on tourism at a local level are assessed as not significant. This supports the findings of ES Volume 4, Chapter 2: Socio-economics (document reference F4.2), which assessed no significant effects on tourism at a regional level.

5.23.3 Summary

5.23.3.1 Overall, by way of the identified significant beneficial cumulative effects on economic conditions in North West England during the construction and operation and maintenance phases, the Transmission Assets and Generation Assets would contribute to improve socio-economic factors, which complies with **NPS EN-1 paragraphs 4.1.5; 4.1.6; 4.3.4; 4.3.5; 4.3.12; 5.5.5; 5.5.52; and 5.13.2 - 5.13.12**.

5.23.3.2 The Transmission Assets also comply with Paragraphs 85 of the NPPF; North West Inshore and North West Offshore Marine Plan Policies NW-REN-1; NW-EMP-1; NW-TR-1; NW-CE-1 and NW–INF-1; Fylde Local Plan to 2032 (incorporating Partial Review) (Adopted December 2021) Policies ; EC1, EC2; CL3; EC4(a); T3 and Central Lancashire Adopted Core Strategy – Local Development Framework Policies 15 and 28.

5.23.3.3 A full list of compliance is included in the NPS tracker (document reference J26), the NPPF tracker (document reference J28.1) and the local policies tracker (document reference J28.3).

5.24 Green Belt and development in the countryside

5.24.1.1 Elements of the Transmission Assets extend through areas of Green Belt and the two onshore substations are proposed to be located within the Green Belt as defined in relevant local policies, shown on **Figure 5.1**. It is noted that although close to the 'Areas of Separation' designation contained within Fylde Local Plan to 2032, no element of the Transmission Assets would cross or affect this designation.

5.24.1.2 Paragraph 143 of the NPPF sets out the five purposes served by Green Belts, which are:

5.24.1.3 To check the unrestricted sprawl of large built-up areas;

5.24.1.4 To prevent neighbouring towns merging into one another;

5.24.1.5 To assist in safeguarding the countryside from encroachment;

5.24.1.6 To preserve the setting and special character of historic towns; and

5.24.1.7 To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

5.24.1.8 When referring to the Green Belt, paragraph 153 of the NPPF confirms that inappropriate development is by definition, harmful to the Green Belt and should only be approved in very special circumstances.

5.24.1.9 Paragraph 153 also requires substantial weight to be given to any harm to the Green Belt in the determination of planning applications, and that '*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'*.

5.24.1.10 Paragraph 154 of the NPPF confirms that local planning authorities should regard the construction of new buildings as inappropriate development in the Green Belt, subject to seven specific exceptions. The proposal includes the construction of two onshore substations within the Green Belt.

5.24.1.11 Paragraph 154 confirms six forms of development that are not inappropriate in the Green Belt, provided they preserve its openness and do not conflict with the purposes of the inclusion of the land within it.

5.24.1.12 Of those six forms of development, underground cabling, which would partly traverse sections of the Green Belt within Fylde Council can be considered to constitute '*b) engineering operations'.*

5.24.1.13 Paragraph 155 provides a further four specific exceptions where the development of homes, commercial and other development in the Green Belt should also not be regarded as inappropriate. It is not considered these exceptions are applicable to onshore substations required for the Transmission Assets.

5.24.1.14 Paragraph 5.11.22 of NPS EN-1 confirms that applicants 'may be able to demonstrate that energy infrastructure, such as an underground pipeline, may be considered as an engineering operation and regarded as not inappropriate in the Green Belt'.

5.24.1.15 In addition, NPS EN-1 paragraph 5.11.37 confirms that the Secretary of State should ensure that 'substantial weight is given to any harm to the Green Belt when considering any application for such development, while taking account, in relation to renewable and linear infrastructure, of the extent to which its physical characteristics are such that it has limited or no impact on the fundamental purposes of Green Belt designation'.

5.24.1.16 The Transmission Assets are considered to benefit from the presumptions given to CNP infrastructure as evidenced in **section 3.4.5.3**, in particular as they are of the type to be considered to be CNP infrastructure in paragraphs 4.2.4 and 4.2.5 of NPS EN-1.

5.24.1.17 The starting point for determination of CNP infrastructure, is that the Applicants demonstrate how the mitigation hierarchy (NPS EN-1, Paragraph 4.2.10) has been applied to avoid, minimise and then mitigate harm and then meet the test of very special circumstances required to justify development by the recognised need for new low carbon infrastructure.

5.24.1.18 Nevertheless, whilst this approach (as confirmed at paragraph 4.2.17 of NPS EN-1) is correct for the Transmission Assets, robust very special circumstances do exist to justify any harm which may occur to the Green Belt by reason of inappropriate development, regardless of the Transmission Assets being classed as CNP infrastructure. Following the submission of Transmission Assets, the NPPF was updated in December 2024, as previously discussed at section 3.4.8. This included the introduction of the Golden Rules and Grey Belt in relation to development in the Green Belt.

5.24.1.19 A Green Belt Technical Note (document reference S_D3_12 F02) was submitted into Examination. This has considered in further detail the purposes of the Green Belt (which interacts with the Transmission Assets Order Limits) and any potential harm on the Green Belt, as a result of the Transmission Assets. This has broadly separated the Green Belt found across the Transmission Assets into three areas: Blackpool and St Anne's, Kirkham and Freckleton and River/South Ribble.

5.24.1.20 The Technical Note considers that only purposes a) and c) (from Paragraph 143 of the NPPF) are relevant to Transmission Assets. **Table 5.1** below is a summary of the existing contributions to the Green Belt purposes of the three aforementioned areas:

Table 5.1: Summary of Blackpool and St Anne's, Kirkham and Freckleton, River/South Ribble contribution to Green Belt purposes

Area	Green Belt Purpose	Existing Contribution Judgement
Blackpool and St Anne's	Purpose A: To check unrestricted sprawl of large built-up areas	Moderate in the west Strong in the east
	Purpose C: To assist in safeguarding the countryside from encroachment	None in the west Strong in the east
Kirkham and Freckleton	Purpose A: To check unrestricted sprawl of large built-up areas	Moderate in the north Strong in the south
	Purpose C: To assist in safeguarding the countryside from encroachment	Moderate/weak in the north Strong in the south
River/South Ribble	Purpose A: To check unrestricted sprawl of large built-up areas	Moderate/Strong
	Purpose C: To assist in safeguarding the countryside from encroachment	Moderate/Strong

5.24.1.21 The Technical Note provides an assessment of the impacts and potential harms to the Green Belt. See section 1.6 of the Green Belt Technical Note (document reference S_D3_12 F02) for the full assessment and Appendix B of the technical note for the full methodology. A summary of the outcomes is provided in Table 5.2 below:

Table 5.2: Summary of impacts and potential harms to Green Belt purposes in Blackpool and St Anne's, Kirkham and Freckleton and River/South Ribble

Area	Green Belt Purpose	Harm Assessment
Blackpool and St Anne's	Purpose A: To check unrestricted sprawl of large built-up areas	None
	Purpose C: To assist in safeguarding the countryside from encroachment	None
Kirkham and Freckleton	Purpose A: To check unrestricted sprawl of large built-up areas	During Construction: Compounds – Major reducing to Negligible During Operation: Substations - Moderate
	Purpose C: To assist in safeguarding the countryside from encroachment	During Construction: Compounds – Major reducing to Negligible During Operation: Substations – Moderate
River/South Ribble	Purpose A: To check unrestricted sprawl of large built-up areas	During Construction: Compounds – Major reducing to Negligible During Operation: Grid connection infrastructure – Negligible
	Purpose C: To assist in safeguarding the countryside from encroachment	During Construction: Compounds – Major reducing to Negligible During Operation: Grid connection infrastructure – Negligible

5.24.1.22 In regard to 'other potential harms' in each of the three aforementioned areas, these have been broken down into the following four categories, considered to be of principal relevance;

- Landscape and Visual Impacts
- Amenity
- Biodiversity
- Highways

5.24.1.23 These other harms and the mitigation hierarchy in relation to each area is also considered. **Table 5.3** provides an overall summary:

Table 5.3: Summary of other potential harms in Green Belt Areas and mitigation hierarchy

Area	Other potential harm	Summary of Harm Assessment	Mitigation hierarchy
Blackpool and St Anne's (section 1.6.4.35 – 1.6.4.59 of the Green Belt Technical Note (document reference S_D3_12 F02)).	Landscape and Visual Impacts	Volume 3, Chapter 10: Landscape and Visual (document reference F3.10) assesses effects on landscape character and visual amenity during construction and operation as part of the LVIA. It is acknowledged that there would be significant and adverse impacts (directly and indirectly) on the prevailing landscape character (19a Fylde Coast Dunes) and on those using the beach, Blackpool Road Recreation Ground and the PRoW network in the vicinity. However, these impacts would be temporary and only occur during construction, with cables buried underground and only inspection covers visible at the joint bays and link boxes in the longer term. Existing habitats and features affected by construction will be reinstated following completion with no significant landscape effects post-construction. Additional, temporary built development to aide construction will also be apparent for those using the beach, Blackpool Road Recreation Ground and bridleways in the vicinity. These effects will be felt locally, reducing beyond the Order Limits.	There are no reasonable alternative routes for landfall and onshore export cable corridor would enable this section of cabling to avoid passing through this Green Belt area (see Volume 1, Chapter 4 and Volume 1, Annex 4.3 of the Environmental Statement (document references F1.4 and F1.4.3) for further details. No permanent above ground infrastructure in proposed in this Green Belt area. The identified harms to the Green Belt are temporary for the duration of construction. All land used for temporary construction activities will be reinstated to its original condition and land use, ensuring the fundamental aim and function of the Green Belt in this area is maintained.
	Amenity	This Green Belt area includes Blackpool Airport and the beach in the west, and agricultural land in the east. The area also includes St Annes Old Links Golf Course and areas of open space, various PRoWs and two bridleways. Amenity impacts are assessed in Volume 3, Chapter 7: Traffic and Transport (document reference F3.7), Volume 3, Chapter 8: Noise and Vibration (document reference F3.8), Volume 3, Chapter 9: Air Quality (document reference F3.9) and Volume 1, Annex 5.1: Human Health (document reference F1.5.1) and conclude that with mitigation measures, the effects on noise, dust	

Area	Other potential harm	Summary of Harm Assessment	Mitigation hierarchy
		and traffic receptors are not significant; therefore harm to the amenity in this Green Belt area is limited and temporary (during construction).	
	Biodiversity	A number of nationally and locally designated ecological and ornithological sites are located within this Green Belt area. As assessed and concluded in Volume 3, Chapter 3: Onshore ecology and nature conservation (document reference F3.3) and Volume 3, Chapter 4: Onshore and intertidal ornithology (document reference F3.4), with the implementation of mitigation measures, there will be no significant residual effects to onshore ecology and ornithology receptors during construction; therefore the harm to biodiversity in this Green Belt area is limited and temporary.	See above
	Highways	Three roads within this Green Belt area are proposed to be utilised by construction traffic. Volume 3, Chapter 7: Traffic and Transport (document reference F3.7) considered the potential impacts of the Transmission Assets and concluded that the roads in this Green Belt area, have bene designed/developed to accommodate significant volumes of traffic, and forecast peak changes in traffic would be indiscernible from day-to-day fluctuations.	
Kirkham and Freckleton (section 1.6.4.60 – 1.6.4.127 of the Green Belt Technical Note (document reference S_D3_12 F02)).	Landscape and Visual Impacts	Volume 3, Chapter 10: Landscape and Visual (document reference F3.10) assesses effects on landscape character and visual amenity during construction and operation as part of the LVIA. It concludes that significant and adverse impacts during construction and operation (prior to landscape mitigation planting has established) would be occur on the landscape character 15d: Coastal Plain – Fylde as well as on those using the	The site selection process for the two substations was robust and took into consideration existing topography, ground conditions and substantial existing hedgerows and woodblocks. They have been co-located with consideration given to landscape and existing

Area	Other potential harm	Summary of Harm Assessment	Mitigation hierarchy
		PRoW network, specifically bridleway BW0505016 and footpath FP050503. The effects would be felt locally, reducing with distance from the Order Limits and as mitigation planting matures. The LVIA concludes there will be no significant long term operational effects on landscape character and the only long-term significant effects on visual amenity would be sequential effects on equestrians and walkers using the linked PRoW immediately adjacent and near to the substation sites (PRoWs BW0505016, FP050503 and FP050504). The area is visually open however is compromised to a degree by the presence of existing residential development and HMP Kirkham. The visual extent and appreciation of additional built development of the substations would be apparent from nearby visual receptors but will be reduced by proposed mitigation planting around each substation site. Impacts on landscape character and nearby visual receptors will be felt locally but dissipate with distance. Elements that remain visually apparent will be subject to design governance and post-consent controls such that the resultant harm is limited to the local contexts of each onshore substation site.	vegetation as far as practicable to minimise impacts to the Green Belt. The outline Landscape Management Plan (document reference J2 F03) provides an Illustrative Landscape Strategy which identifies areas of landscape mitigation planting which will help further mitigate the effects of the substations and encroachment on the Green Belt. Detailed Landscape Management Plans prepared post consent and agreed with the relevant authorities will include details such as the number, location and species of plants, alongside details on management and maintenance. The proposals include a mix of species, which will provide early screening and the establishment of a woodland over the longer term. The proposed planting will help to limit encroachment by providing a natural edge to the substation sites, enabling them to be integrated into the landscape and screened from views from PRoWs and the surrounding settlements.
	Amenity	This Green Belt Area includes HMP Kirkham, agricultural land, private stables and a number of farm buildings. Amenity impacts are assessed in Volume 3, Chapter 7: Traffic and Transport (document reference F3.7), Volume 3, Chapter 8: Noise and Vibration (document reference 3.8), Volume 3, Chapter 9: Air Quality (document reference F3.9) and Volume 1, Annex 5.1: Human Health (document reference F1.5.1) and conclude that	

Area	Other potential harm	Summary of Harm Assessment	Mitigation hierarchy
		with mitigation measures, the effects on noise, dust and traffic receptors are not significant; therefore harm to the amenity in this Green Belt area is limited and temporary (during construction). Potential harm to amenity may arise from the operation of the substations in terms of noise impacts however Volume 3, Chapter 8: Noise and vibration (document reference F3.8) concludes that noise effects would not be significant when mitigation measures are in place to control operational noise as its source. An operational noise limit has also been set, which will be in accordance with relevant noise standards.	
	Biodiversity	Freshfield Farm Pond North and Freshfield Farm Pond South provide important habitats for aquatic invertebrates. The habitats in this area primarily comprise of improved grassland and arable land with an extensive network of ponds. With the implementation of mitigation measures, there will be no significant residual effects to onshore ecology and ornithology receptors during construction; therefore harm to biodiversity in this Green Belt area is limited.	See above
	Highways	The A584 (Link 57a/b), A583 (Link 61a/b) and Kirkham Road (Link 53) carry between 7.5k and 14k vehicles per day. A peak increase in traffic upon the three roads would be between 2-3% at peak. These roads within the Green Belt between Kirkham and Freckleton proposed to be utilised have evolved to accommodate significant levels of traffic. Forecast peak changes in traffic would be indiscernible from day-to-day fluctuations. Current IEMA guidance details that day-to-day variation of road traffic is frequently at least + or – 10%, and	

Area	Other potential harm	Summary of Harm Assessment	Mitigation hierarchy
		changes in traffic flows of less than 10% creates no discernible environmental impact.	
River/South Ribble (section 1.6.4.128 – 1.6.4.192 of the Green Belt Technical Note (document reference S_D3_12 F02)).	Landscape and Visual Impacts	Potential harm would arise from the construction of the 400kV grid connection cables in combination with associated construction compounds. The LVIA (document reference F3.10) concludes that impacts would range between moderate adverse and negligible adverse where the 400kV grid connection cables and construction compounds directly and indirectly affect the following landscape character areas: 15d Coastal Plain – The Fylde 17a Enclosed Coastal Marsh: Clifton and Hutton 18a Open Coastal Marsh: Ribble Marshes 15b Coastal Plain: Longton – Bretherton No impacts were assessed to be significant. The LVIA concludes that visual impacts would range between major and negligible adverse significant, and affecting people using local footpaths and bridleways within 1km of the corridor route and occupiers of residential properties in close proximity to the construction site/activities during the construction phase. With the cables buried and existing habitats and features reinstated, no significant landscape effects are likely to persist post-construction. Whilst the area covered by the Order Limits is visually open, the character to the immediate west of Higher Penwortham is compromised to some extent by the presence of the National Grid Substation and its associated infrastructure, which influences the area's character within the vicinity of the Order Limits.	In this Green Belt area, once cables are installed and connection works complete, all temporary works areas will be removed and the ground reinstated to its original condition. Where practicable, consideration will be given to early restoration of sections of the cable route.

Area	Other potential harm	Summary of Harm Assessment	Mitigation hierarchy
		For cable construction, various low level temporary buildings and storage facilities will be required, which whilst reversible, would be discordant with the largely rural context. Construction activities close to and within the National Grid Substation would be less intrusive.	
	Amenity	This area of the Green Belt includes the National Grid Penwortham substation, several settlements, and agricultural land. The area also includes private stables, the Ribble Way Long Distance Footpath, the National Cycle Network and a number of footpaths. The impact of assessments in Volume 3, Chapter 7: Traffic and Transport (document reference F3.7), Volume 3, Chapter 8: Noise and Vibration (document reference F3.8), Volume 3, Chapter 9: Air Quality (document reference F3.9) and Volume 1, Annex 5.1: Human Health (document reference F1.5.1) conclude that with mitigation measures, the effects on noise, dust and traffic receptors are not significant. Therefore, harm to the amenity is limited and of temporary duration.	
	Biodiversity	This Green Belt Area includes a number of local ecological designations: – Booth's Plantation BHS (oak woodland with characteristics of ancient woodland) – Mill Brook Valley BHS (species-rich neutral grassland) – Four Acre Wood (Designated for ancient semi-naturals woodland on the southern terrace of the River Ribble floodplain) – Blashaw and Blashaw Dam Woods (Two areas of semi-natural broadleaved woodland	See above.

Area	Other potential harm	Summary of Harm Assessment	Mitigation hierarchy
		with ponds providing habitat for great crested newt) and – Howick Hall Ponds (Cluster of small ponds and surrounding terrestrial habitat supporting GCN and other amphibian species. As assessed and concluded in Volume 3, Chapter 3: Onshore ecology and nature conservation (document reference F3.3) and Volume 3, Chapter 4: Onshore and intertidal ornithology (document reference F3.4), with the implementation of mitigation measures, there will be no significant effects on onshore ecology and ornithology receptors during construction; therefore harm to the biodiversity in this Green Belt Area is limited and temporary in its duration.	
	Highways	The A59 (Link 98/99) and Howick Cross Lane (Link 101) are proposed to be utilised by construction traffic. The A59 (a standard dual carriageway) carries between 17.5k and 23k vehicles per day. The peak increase in traffic on Links 98 and 99 is anticipated to be 2% (Table 7.21, Volume 3: Chapter 7, Traffic and Transport (document reference F3.7). Current IEMA guidance details that day-to-day variation of road traffic is frequently at least + or – 10%, and changes in traffic flows of less than 10% creates no discernible environmental impact. Howick Cross Lane (a two-way road with a footway and street lighting which then narrows to a shared single use carriageway with passing places) would seek a peak increase in traffic upon Link 101 of up to 18%. Volume 3: Chapter 7, Traffic and Transport (document reference F3.7) details that the forecast levels of peak traffic would not result in significant effects upon severance and fear and	See above.

Area	Other potential harm	Summary of Harm Assessment	Mitigation hierarchy
		intimidation/amenity. The requirement for mitigation measures to manage delays and safety has been identified in relation to the change in HGV traffic and measures are proposed in the outline Construction Traffic Management Plan (document reference J5 F03) including the use of traffic management solutions or formalising/improvement of existing passing places. All highway mitigation measures would be reinstated following completion of the relevant stage of the construction phase.	

5.24.1.24 Overall, the technical note concludes:

- There is 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, including implementation of a structured design process including site selection and consideration of the Horlock Rules embedded in NPS EN-5 and application of guidance published by PINS: Achieving good design in Nationally Significant Infrastructure Projects and Linear Infrastructure: Best Practice in NSIP Applications guidance note; and Project Level Design Principles published by National Infrastructure Commission.
- The resulting harm on the fundamental aim and relevant purposes of the Green Belt, will be limited and general performance of the Green Belt would remain effective in both the construction and operational phases. by 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. Any harm caused during the construction phase as a result of the construction compounds would occur over a relatively short period 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.
- In accordance with the test set out in Paragraph 153 of NPPF, the Applicants consider that there are robust Very Special Circumstances which clearly outweigh the identified limited short and longer terms harms arising from the proposals by reason of inappropriate development.
- Regardless of the Very Special Circumstances case, the Transmission Assets are correctly considered to comprise as Critical National Priority infrastructure – 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.
- In addition, the objectives of the relevant Local Plan policies are also met, where reasonably practicable.

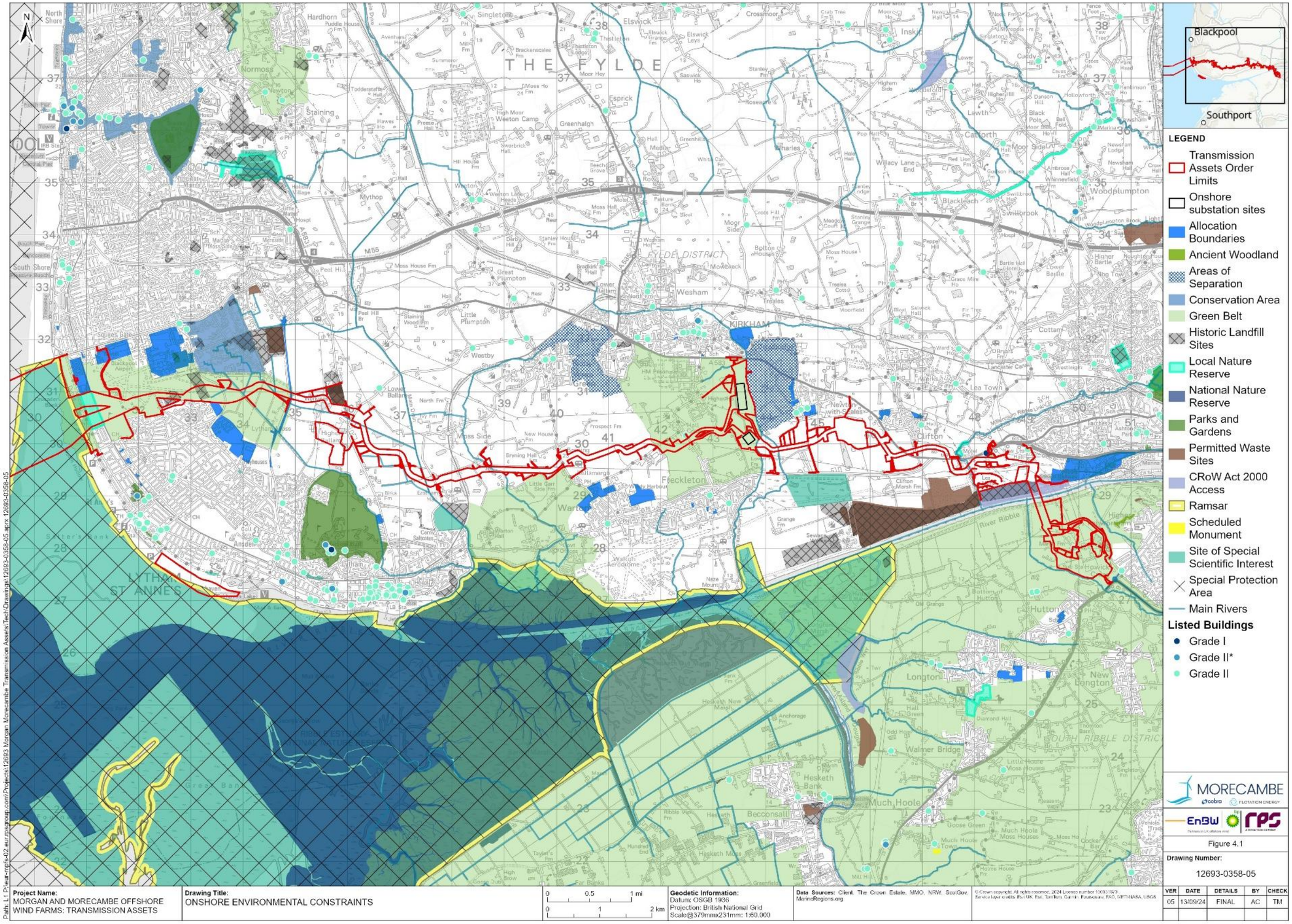


Figure 5.1: Onshore environmental constraints

5.24.1.25 As such, and as assessed and demonstrated in **section 6.2** below, the starting point for decision-making by the Secretary of State 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.

5.24.1.26 As they benefit from the presumptions which apply to CNP infrastructure, therefore, the Transmission Assets meet the requirements for very special circumstances to allow development in the Green Belt. This means that matters of openness or justification regarding the impact on the purposes of including land into the Green Belt are not required, as the need for CNP infrastructure outweighs the harm to the Green Belt by reason of inappropriateness and any other harm.

5.24.1.27 Paragraph 3.3.63 of NPS EN-1 also defines that CNP infrastructure should be progressed as soon as possible, as there is an '*urgent need'* (paragraphs 3.2.6 and 3.2.7 of NPS EN-1) for this type of development, which also applies to developments directed to the development consent process as a result of a section 35 direction (paragraphs 3.3.65 to 3.3.83 of NPS EN-1) meaning substantial weight must be attributed to CNP proposals for low carbon infrastructure.

5.24.1.28 In addition, it is further noted that paragraph 160 of the NPPF also acknowledges that, '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.'

5.24.1.29 The assessment and balance presented in **section 6** presents the benefits resulting from the Transmission Assets which include the significant beneficial impacts as a result of energy transmission from renewable sources (here the outputs of two separate nationally significant infrastructure projects) and therefore it is considered that very special circumstances exist to outweigh the harm to Green Belt by reason of inappropriateness and any other harm.

5.25 Holistic network review and site selection

5.25.1.1 As set out in **section 2**, both the Morgan Offshore Wind Project and the Morecambe Offshore Windfarm were scoped into the 'Pathways to 2030' workstream under the OTNR. The OTNR aims to consider, simplify, and wherever possible facilitate a collaborative approach to offshore wind projects connecting to the UK electricity transmission network.

5.25.1.2 A number of potential grid connection locations and options were considered by NGESO, based on an understanding of the grid infrastructure capacity in relation to the Generation Assets. Whilst the decision regarding the point of interconnection ultimately sits with NGESO, Morgan OWL and Morecambe OWL (the Applicants) engaged with NGESO throughout the process to understand the proposed solutions for connection of the Generation Assets

to the grid and to provide input on environmental and consenting constraints for the point of interconnection under consideration.

5.25.1.3 In July 2022, the UK Government published the 'Pathway to 2030 Holistic Network Design' documents, which set out the approach to connecting 50 GW of offshore wind to the National Grid (NGESO, 2022). A key output of the HNDR process was the recommendation that the Morgan Offshore Wind Project and the Morecambe Offshore Windfarm should work collaboratively in connecting the offshore two wind farms to the electricity transmission network at Penwortham in Lancashire. This point of interconnection was identified by NGESO as representing the optimal location considering a range of criteria (i.e., technical, cost, environmental and deliverability factors).

5.25.1.4 Morgan OWL and Morecambe OWL (the Applicants), being in agreement with the output from the HNDR, are jointly seeking a single consent for their electrically separate transmission assets comprising aligned offshore export cable corridors to landfall and aligned onshore export cable corridors to separate onshore substations (and associated infrastructure), and onward connection to the National Grid at Penwortham, Lancashire.

5.25.1.5 The HNDR process has therefore been integral to the application, taking into account the following.

- Section 2.13 of NPS EN-5 outlines that in preparing applications for offshore-onshore transmission there should be consideration of strategic network design (including the outcomes of the HNDR). These outcomes have been fully adopted by the Applicants in terms of the design of the Transmission Assets to accommodate the point of interconnection at p Penwortham.
- Section 2.13 of NPS requires that a coordinated approach to design should be adopted. Radial offshore transmission options to single windfarms should only be proposed where options assessment work identifies that a co-ordinated solution is not feasible. Section 2.13 of the NPS confirms policy support for a coordinated approach. This approach has been adopted by Morgan OWL and Morecambe OWL for the Transmission Assets, culminating in a single application for development consent for the transmission infrastructure for both offshore wind farms.

5.25.1.6 The Transmission Assets has a coordinated and aligned site selection process. If each project had proposed a separate and independent radial connection, this would result in two separate dissociated site selection processes with limited awareness of decisions made by the other promoter leading to disparity in constraints considered, different BRAG scoring, and differing definition of land parcels.

5.25.1.7 In summary:

- The Transmission Assets have aligned their guiding principles for site selection to coordinate the location of infrastructure. If each project proposed its own radial connection for their onshore export cables to independently located onshore substations, the cable routes would be spread across the landscape to their respective onshore substation locations with the onward 400kV cables both needing to go to

Penwortham National Grid substation. There would have been no alignment of guiding principles for siting infrastructure and limited awareness of decisions made by the other project resulting in dis-jointed impacts across a wider area, with more extensive effects on communities. Each project's infrastructure would be as far as possible from the other to avoid interactions and potential cumulative effects, thereby proliferating infrastructure across a larger area and across multiple communities.

- The Applicants have aligned their land strategy for the projects. If each project was being developed separately with the same PoI at Penwortham and due to the competitive nature of land process, each developer would likely be seeking to secure larger areas to protect their development from the other, resulting in greater impacts and land take.
- There is one DCO application for the Transmission Assets. If not coordinated, each project would have prepared and submitted their own DCO application for its separate radial connection with its own documentation and EIA. This would have resulted in twice the volume of documentation, differing EIA assessment and differing approached to mitigation which is likely to overwhelm already constrained local authority / stakeholder resource.
- The Applicants, along with the respective Generation Asset, have undertaken a coordinated engagement approach. If uncoordinated, then each project would have separate project engagement with landowners, communities and stakeholders resulting in consultation fatigue and confusion in the local community over different developer messages around different projects being promoted at the same time.

5.25.1.8 The Applicants' approach of not seeking independent and separate radial connections and coordinating site selection and location of the onshore substations, has resulted in minimising environmental and community impacts for all the reasons outlined above, and avoiding infrastructure proliferation in line with NPS EN-5.

5.25.1.9 As detailed in REP1-039, an alternative route, involving an alternative PoI at or near Stanah has been suggested by some IPs, including the suggestion that the onshore substations should be located at Hillhouse Technology Local Enterprise Zone (LEZ), adjacent to the NGET Stanah substation (which is part of NETS, the transmission network owned by NGET including existing overhead lines). Any form of proposed alternative PoI into the NETS would be a change in the PoI for the Projects, as identified by NESO in the HND and secured in connection agreements with NESO. NGET were engaged in the preparation of the HNDR by NESO and the upgrade works between Stanah and Penwortham are reinforcement works to the NETS (for which NGET have responsibility for); subsequently there was a full understanding of a potential connection at or near Stanah when the HNDR was prepared. Therefore, the Applicants' position is that the PoI for the Transmission Assets (i.e. at or around Stanah compared to Penwortham (is primarily a matter for NESO (in consultation with NGET) as part of the HND and subsequent connection offer process.

5.25.1.10 Furthermore, the only 'alternative route' that does not involve a change in PoI and would allow the onshore substations to be located at Hillhouse Technology LEZ would be to construct the onshore substations near the current Stanah substation and bypass the current NGET Stanah substation. These new substations would not be owned by NGET, and would involve the construction of underground cables or new overhead line from the new onshore substations to the Penwortham substation (the PoI); this would involve significant additional construction including a significant length of additional 400kV underground cabling or overhead lines, which do not accord with the adopted site selection principles. Therefore, the only technically possible option (i.e. substations to be located at Hillhouse Technology LEZ) would be far more complex, costly and disruptive than the cable route proposed.

5.25.1.11 The Applicants have undertaken a site selection process based on the output of the HNDR process to identify the location and refine the design of the key elements of the Transmission Assets, including through early engagement with a range of stakeholders. The aim was to identify locations and routes (for the offshore export cable corridor, landfall location, onshore cable corridors and onshore substations) that were environmentally acceptable, deliverable and consentable, whilst also enabling the benefits in the long term of the lowest energy cost to be passed to the consumer. Details of this are presented in Volume 1, Chapter 4: Site selection and alternatives of the ES (document reference F1.4).

5.26 HRA and MCZ assessments

5.26.1 Overview

5.26.1.1 NPS EN-1 (paragraph 4.2.18) sets out that any HRA or MCZ impacts associated with CNP infrastructure will continue to be considered under the framework set out in the Habitats Regulations and the Marine and Coastal Access Act 2009 respectively.

5.26.2 HRA

5.26.2.1 A HRA Stage 1 Screening Report (document reference E3) and an ISAA report (document references E2.1, 2.2, 2.3) has been produced, setting out the findings of the HRA process undertaken for the Transmission Assets to ensure compliance with the Habitats Regulations.

5.26.2.2 Parts 2 (document reference: E2.2) and 3 (document reference: E2.3) of the ISAA consider whether the Transmission Assets could have adverse effects, either alone or in-combination with other plans or projects, on the integrity of 25 designated European sites and three Ramsar sites for which the potential for likely significant effects could not be excluded in the HRA Stage 1 Screening Report (document reference: E3).

5.26.2.3 The ISAA assesses the environmental effects resulting from the Transmission Assets. An assessment of adverse effects of the Transmission Assets alone and in-combination has been carried out against the conservation objectives for each relevant European site screened into the

assessment. This assessment has taken account of the best available baseline information and has been undertaken in view of the measures adopted as part of the Transmission Assets to mitigate the potential for adverse effects.

5.26.2.4 The consideration of the potential for adverse effects on the integrity of European sites has been made with reference to the overall ecological functions and the lasting preservation of the constitutive characteristics of the sites.

5.26.2.5 The assessment set out in Parts 2 and 3 of the ISAA concludes that there would be no adverse effect on the integrity of any of the designated sites assessed, either from the Transmission Assets alone, or in combination with other plans and projects.

5.26.2.6 Within the HRA three mitigation area were proposed to reduce the effects, and throughout the examination process the issue of compensation vs mitigation has been tested by the ExA In response to ExA Q2:9.1.9 Natural England state:

5.26.2.7 “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.”

5.26.2.8 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.

5.26.2.9 Therefore, although NPS EN-1 acknowledges that CNP infrastructure can be capable of amounting to imperative reasons of overriding public interest for HRA, this test is not required to be met for the Transmission Assets, which meet the requirements of the Habitats Regulations and **NPS EN-1, paragraphs 4.2.18 to 4.2.22** in terms of HRA.

5.26.3 MCZ

5.26.3.1 With respect to MCZ assessment, the MCZ screening and stage 1 assessment report (document reference E4) has identified a single MCZ, the Fylde MCZ, with the potential to be significantly impacted by the construction, operation and maintenance, and decommissioning phases of the Transmission Assets. The Fylde MCZ was therefore carried through to a MCZ Stage 1 assessment for a full assessment against the relevant conservation objectives in relation to the potential direct and indirect impacts arising from the construction, operation and maintenance, and decommissioning phases of the Transmission Assets.

5.26.3.2 This MCZ Stage 1 assessment considered the effects of the Transmission Assets the construction, operation and maintenance, and decommissioning phases on the subtidal sand and subtidal mud protected features of the Fylde MCZ (subtidal sand and subtidal mud). This included consideration of effects

on attributes and targets of the relevant protected features, and subsequently on the conservation objectives.

5.26.3.3 Based on the information presented in section 1.8 of the MCZ screening and stage 1 assessment report, which includes assessments on the relevant broadscale habitats of the Fylde MCZ (i.e., subtidal sand and subtidal mud), it is concluded that the conservation objective of maintaining the subtidal sand and subtidal mud protected features of the Fylde MCZ in a favourable condition will not be hindered by the construction, operation and maintenance, and decommissioning phases of the Transmission Assets in isolation, or cumulatively with any other plan, project or activity.

5.26.3.4 As no significant risks to the achievement of the Fylde MCZ conservation objectives have been identified in the MCZ Stage 1 assessment, a Stage 2 assessment was determined not to be required at Application stage.

5.26.3.5 During the examination, and in consultation with Natural England,the Applicants have undertaken a Stage 2 MCZ Assessment and prepared a without prejudice DCO Schedule for Measures of Equivalent Environmental Benefit and submitted these into Examination at Deadline 1. These were updated throughout the Examination in response to feedback from Natural England (REP6-134 and REP5-108 respectively).

5.26.3.6 Therefore, although NPS EN-1 acknowledges that for CNP infrastructure the benefit to the public is capable of outweighing the risk of environmental damage, this test is not required to be met for the Transmission Assets, which meet the requirements of **NPS EN-1, paragraphs 4.2.18 to 4.2.22** in terms of MCZ assessment.

5.27 Other planning considerations

5.27.1.1 The site selection process reported in Volume 1, Chapter 4: Site selection and consideration of alternatives of the ES (document reference F1.4) has taken into account the site allocations within Blackpool Local Plan Part 1: Core Strategy 2012-2027; Blackpool Local Plan Part 2: Site Allocations and Development Management Policies Adopted February 2023; Fylde Local Plan to 2032 (incorporating Partial Review); Preston Local Plan 2012-26; South Ribble Local Plan 2012-2026 and Central Lancashire Adopted Core Strategy – Local Development Framework and sought to avoid any allocations within the selected landfall, cable route and substation locations.

5.27.1.2 In particular, the allocations designated in the Fylde Local Plan 2032 (incorporating Partial Review) were reviewed and accounted for. None of these, including the allocations for transport infrastructure (such as the M55 to Heyhouses (St Annes) Link Road under Policy T1) would be sterilised by the Transmission Assets.

5.27.1.3 Impacts upon Blackpool Airport Enterprise Zone Masterplan were not only taken into account as part of the site selection process but are also identified within Volume 4, Chapter 2: Socio-economics of the ES (document reference F4.2) in particular regarding Blackpool Airport and the Enterprise Zone. This

assessment concluded that the impacts on Blackpool Airport's operations are anticipated to be entirely reversible and not significant.

5.27.1.4 REP1-078 13.3.3 of the Fylde Local Impact report highlighted how the northern access route through Blackpool Airport (identified as Work No. 34A34B on the Works Plans – Onshore and Intertidal Part 1 of 2 (AS-016)) and the corresponding operational access, runs through designated site ES5 by Fylde Local Plan Policy EC1 for employment use. Site ES5 has also been identified in the Blackpool Airport and Enterprise Zone Masterplan as the "Knowledge Quarter" under Policy EC4. See section 5.27.1.5 below for an update on the position of this operational access and access route.

5.27.1.5 Change Request (AS-081)On 23 July 2025, the Applicants submitted a Change Request (AS-081) to make changes to the Transmission Assets DCO Application, which can be summarised as follows:

1. Relocation of Access TAT_MGMC_9 for Morgan OWL and Morecambe OWL and Relocation of access OAR_MGMC_10 for Morgan OWL; and the provision of an additional construction access TAT_MGMC_9B for both Morgan OWL and Morecambe OWL;
2. Identification of Blackpool Airport operational access alignment through Work Nos. 10A10B, 12A12B and 14A14B;
3. Removal of operational access OAR_MGMC_3 from Squires Gate Lane into Blackpool Airport; and
4. Reduction to Order Limits within Blackpool Airport (Work No. 13A13B), Blackpool Road Recreation Ground (Work Nos. 15A15B, 53A53B and 54A54B) and to the east of the Queensway (Work Nos. 16A16B).

5.27.1.6 Change 3 amends and reduces the proposed Order Limits to remove an operational access (OAR_MGMC_3 identified on Sheet 1 of the Access to Works Plan (APP-157)) and its associated access route across Blackpool Airport operational land (Work Nos. 34A34B identified on Sheets 1, 3 and 4 of the Works Plans – Onshore and Intertidal – Part 1 of 2 (REP3-007)). Due to commitments made by the Applicants via the negotiations with Blackpool Airport, operational access to the Transmission Assets and onshore export cables will be taken via Access OAR_MGMC_5 from Leach Lane, as identified within Change 2. Therefore, access via OAR_MGMC_3 from Squires Gate Lane is no longer required.

5.27.1.7 In relation to REP1-078 13.3.3 in the Fylde Local Impact Report (discussed at Paragraph 5.27.1.4 above), the Change Request removes the access route and operational access from designated site ES5, and relocates this to Leach Lane. Due to this change request, there is no impact on designated site ES5 either during construction or operation.

6 Balance of considerations and overall conclusions

6.1 Overview

6.1.1.1 Following a request from the Applicants, on 4 October 2022 the Secretary of State issued a direction under section 35 of the Planning Act 2008 (document reference J24) that the Transmission Assets should be treated as 'development for which development consent is required'. Applications for development consent under the Planning Act 2008 are submitted to and examined by the Planning Inspectorate and determined by the relevant Secretary of State.

6.1.1.2 Section 104(3) of the Planning Act 2008 states that the Secretary of State should decide such applications in accordance with relevant NPSs, with the fundamental test to be applied in the decision-making process being whether, on balance, the project is in accordance with the relevant NPSs.

6.1.1.3 This Planning Statement has set out the background to and the context for the Transmission Assets, as well as the legal and policy framework it should be assessed against. It includes a description of the need for the Transmission Assets and the outcomes of the EIA, HRA and MCZ assessment processes, including both beneficial and adverse effects.

6.1.1.4 This section summarises the need for the Transmission Assets, together with its wider benefits, and weighs those against any adverse effects identified through the environmental assessment work that has been undertaken.

6.1.1.5 This balancing exercise considers the context of national, UK and international policies and obligations that seek to tackle climate change, deliver security of the UK's energy supply and promote the necessary shift to renewable energy as well as accordance with national and local planning policy.

6.2 Project need and benefits

6.2.1.1 As established in **section 4** of this Planning Statement, the Transmission Assets are considered to benefit from the presumptions given to CNP for low carbon infrastructure, as set out in paragraph 4.24 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.

6.2.1.2 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, providing almost 2GW of new offshore wind capacity, which would result in significant beneficial effects in terms of the UK's commitments to achieve net zero by 2050.

6.2.1.3 From a national policy context, the need for the Transmission Assets as a proposal benefiting from the presumptions which apply to CNP infrastructure is confirmed by NPS EN-1, with additional support confirmed in NPS EN-3 and NPS EN-5, as the Transmission Assets would provide a coordinated approach to the delivery of energy transmission infrastructure to improve the resilience of the existing network and unlocks the transmission of offshore energy into the National Grid. There is therefore a clear compelling case in the public interest for the Transmission Assets.

6.2.1.4 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).

6.2.1.5 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. This includes electricity networks infrastructure directed into the Planning Act regime through section 35 (paragraphs 3.2.11 and 3.2.12).

6.2.1.6 In particular, paragraph 3.3.62 of NPS EN-1 states that the Government '… has concluded that there is a critical national priority (CNP) for the provision of nationally significant low carbon infrastructure' including offshore wind and associated transmission infrastructure which can strengthen the overall electricity network to support the delivery of generating assets.

6.2.1.7 Part 3 also explains that without significant amounts of new large-scale energy infrastructure, the Government's energy and climate change objectives cannot be fulfilled and this will not be possible without some significant residual adverse effects (paragraph 3.1.2).

6.2.1.8 Paragraphs 3.3.62 and 4.2.4 of NPS EN-1 confirm that the Government '… has concluded that there is a critical national priority (CNP) for the provision of nationally significant low carbon infrastructure.'

6.2.1.9 Importantly, in relation to CNP infrastructure, 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.' (our emphasis underlined).

6.2.1.10 The strengthened presumption in favour of CNP infrastructure also confirms that 'where non-HRA or non-MCZ impacts remain after the mitigation hierarchy has been applied, these residual impacts are unlikely to outweigh the urgent need for this type of infrastructure' and '… in all but the most exceptional circumstances, it is unlikely that consent will be refused on the basis of these residual impacts'(paragraph 4.2.15).

6.2.1.11 In this regard 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. This includes development development in the Green Belt (paragraphs 4.2.16 and 4.2.17).

6.2.1.12 This need is further confirmed in wider international and national governmental obligations and objectives relating to low carbon electricity generation, climate change and the economy including the UK Climate Change Act 2008 the UK's Energy Security Strategy (BEIS and Prime Minister's Office, 2022) and the Clean Power 2030 Action Plan (DESNZ, 2024c)

6.2.1.13 Further, it has more recently been re-enforced by agreements made at COP28 in November 2023 whereby the Global Renewables and Energy Efficiency Pledge, with endorsement from 130 national governments, now stipulates that signatories commit to work together to triple the world's installed renewable energy generation capacity to at least 11,000 GW by 2030 (United Nations, 2024).

6.2.1.14 However, the Applicants note that the CNP provision is intended to support projects that have followed appropriate planning and environmental processes and does not override those processes. The Applicants do not consider that the CNP test replaces the planning balance but rather provides additional weight to the need for the Transmission Assets where appropriate in carrying out the planning balance (see paragraph 4.2.8 of EN-1). The Secretary of State (SoS) is entitled to consider the application as a whole and the Applicants do not consider the CNP provision as introducing a new separate or elevated test.

6.2.1.15 In relation to other, tangible benefits of the Transmission Assets, these include:

- Contracts for Difference Process (CfD); Should either the Morgan Offshore Wind Project or the Morecambe Offshore Wind Farm participate in a future allocation round under the UK Government's Contracts for Difference (CfD) scheme, the projects will be required to submit a Clean Industry Bonus (CIB) application as part of the CfD process. The CIB is intended to incentivise developers to support economic growth and regeneration in disadvantaged or deprived areas of the UK. To be eligible for the CIB, applicants must demonstrate credible and tangible commitments to investment that deliver measurable local benefits. These could be through the location of manufacturing, assembly, installation, or port-related activities within qualifying areas.
- Climate Change and GHG emissions; The Transmission Assets will make a significant contribution towards the reduction of the UK's GHG emissions and will contribute to meeting global, European and national targets on carbon dioxide reduction. In providing low carbon energy infrastructure, the Transmission Assets will be providing CNP infrastructure, which government policy strongly supports and has identified as urgently needed.

- Biodiversity; The Transmission Assets, alongside the Generation Assets, will contribute to halting overall biodiversity loss globally as a result of its contribution to addressing climate change and through integrated biodiversity net gain measures. In relation to local benefits, the majority of ecological effects have been avoided or mitigated. Whilst some residual effects remain, as a result of the partial loss of Mill Brook Valley BHS, in accordance with the outline Biodiversity Benefit Management Plan (document reference J11), there would also be some potential for long term benefits associated with onshore biodiversity, specifically the additional planting at the onshore substations and associated access tracks. Additionally, despite not being a mandatory requirement, the Applicants have voluntarily committed to provide a designated level of BNG via a standalone area of biodiversity benefit at Lea Marsh Fields. Measures include grassland habitat enhancement, hedgerow enhancement for a retained native species-rich hedgerow at the proposed Morgan substation site, habitat enhancement along a section of Dow Brook and scrub planting in certain areas (and alternative options should the land rights for this area not be forthcoming). This voluntary approach, which reflects emerging best practice, is supported by a robust 30-year management and monitoring framework and ensures that biodiversity benefit will not only offset permanent land take but also contribute to wider ecological resilience and the delivery of strategic environmental outcomes in Lancashire.
- Socio-economic; The Transmission Assets will clearly make a significant contribution towards the UK's much-needed transition to a low carbon economy and expenditure on major energy infrastructure projects can simulate growth by creating jobs and increasing output. This includes the potential for up to 255 employment opportunities (Full Time Equivalent years) for residents in the study area during development and construction, and up to 50 such opportunities during the operation and maintenance phase. This will have a direct economic benefit; more detailed information is provided in Volume 4, Chapter 2: Socio-economics of the ES (document reference F4.2, specifically tables 2.69 and 2.73).
- An outline Employment and Skills Plan (APP-239) has been submitted with the DCO application and sets out various initiatives which will aim to support employment and skills development in the local area, in alignment with various outline principles which have been identified to support employment and skills needs in North West England. The Employment and Skills Plan is secured via Requirement 19 of Schedules 2A and 2B of the draft DCO (AS-004), which requires no works may commence within a relevant planning authority's area until after consultation with Lancashire County Council (and must be substantially in accordance with the outline Employment and Skills Plan).
- Benefits of coordination; The coordination of the Transmission Assets provides a number of benefits, including reducing environmental and community impacts, which the Applicants have sought to do in accordance with paragraph 2.13.14 of EN-5. These benefits include;

- The rationalisation of landfall locations, minimising geographic spread at a regional level which in turn minimises the overall number of communities and environmental receptors which are affected;
- Aligned cable corridors allow for detailed alignment of infrastructure which ultimately avoids the proliferation of infrastructure within the host community compared to separately developed radial connections. Overall, the Applicants have sought to contain impacts to an overall smaller area and a smaller number of landowners;
- Consenting of the Transmission Assets via one DCO application, which is unprecedented for two projects of this nature. This has included benefits such as only one consultation phase and examination process for the local community and a single suite of application and environmental assessment documents. This has allowed for a far more detailed assessment of the combined impacts from all elements of the Transmission Assets. This has ensured mitigation measures can also be coordinated, to ensure the more effective reduction of environmental impacts and the development of a single set out outline management plans to align the approach across both projects; and
- All post-consent management plans will be based on a single suite of outline plans, which were submitted as part of the application. This will ensure consistency in approach from both projects, in respect of mitigation measures, delivery principles and overall construction controls.
- A common approach to design based on agreed Project Level Design Principles and Design Code.

- Community funds for Transmission Infrastructure; Whilst not a material consideration, the Applicants are committed to delivering a community benefit fund in line with the Community Funds for Transmission Infrastructure guidance, published in April 2025 by DESNZ. The guidance sets out the government's recommendation for the level of funding that developers should consider for community benefit, which it outlined to be £530,000 for each onshore substation.

6.2.1.16 The Applicants emphasise that provision of biodiversity net gain (BNG) is not a statutory requirement in relation to the Transmission Assets, and the biodiversity benefit measures which are proposed by the Applicants is entirely voluntary in order to provide additional benefit to the local area. Paragraph 4.6.6 of NPS EN-1 specifically notes that energy NSIP proposals "*should seek opportunities to contribute to and enhance the natural environment by providing net gains for biodiversity, and the wider environment where possible*". NPS EN-1 also notes that Applicants should utilise the latest biodiversity metric which is provided for statutory BNG and present this as part of the application, which the Applicants have complied with and evidenced as part of the outline Biodiversity Benefit Management Plan (J11/F06). Habitat creation and enhancement measures proposed to achieve measurable biodiversity benefit for the Transmission Assets and the

results of the calculation of biodiversity benefit are set out in within the outline Biodiversity Benefit Management Plan (J11/F06).

6.2.1.17 Further to these benefits, the Transmission Assets:

- would make a contribution towards the UK's part in meeting the recently agreed COP28 Global Renewables and Energy Efficiency Pledge to triple the world's installed renewable energy generation capacity by 2030;
- would contribute towards the British Energy Security Strategy's target of 50GW of offshore wind by 2030, as set out in the UK Government's 2022 Energy Security Statement;
- would assist in meeting the UK Government's target in the Climate Change Act of 'net zero' greenhouse gas emissions for the year 2050 (i.e., to be 100% lower than the 1990 levels) in order to meet its obligations under international climate change agreements;
- would assist in meeting future increases in electricity demand as significant sectors of energy demand switch from being powered by fossil fuels to using electricity;
- would result in significant beneficial effects in terms of the cumulative assessment on climate change; and
- would result in beneficial effects from increase on GVA.

6.2.1.18 Specifically in relation to need, NPS EN-1 confirms that the Transmission Assets should be considered on the basis that the Government has demonstrated that there is a need for renewable energy infrastructure, that the scale of the need is significantly in excess of what is currently being promoted and that the need for renewable energy is urgent (paragraphs 3.1.1, 3.2.6 and 3.5.58 of EN-1).

6.2.1.19 Furthermore, as recently emphasised in the designated NPSs, this urgent need for low carbon energy infrastructure means that this is CNP infrastructure (paragraph 3.3.62 of NPS EN-1).

6.2.1.20 Accordingly, substantial weight should be given to the beneficial contribution that the Transmission Assets would make towards satisfying this need (paragraph 3.2.7 of EN-1).

6.2.1.21 Importantly, in relation to CNP infrastructure, paragraph 3.3.63 of NPS EN-1 not only stresses the urgent need for such projects by confirming that the need '*will in general outweigh any other residual impacts not capable of being addressed by application of the mitigation hierarchy*' but also reiterates that the Government strongly supports the delivery of CNP infrastructure and it should be progressed as quickly as possible.

6.3 Project impacts

6.3.1.1 The submitted ES (document reference F1 to F4) sets out the baseline environmental information and environmental impacts predicted to arise from the Transmission Assets. A range of mitigation is proposed as part of the

application for development consent, and details are presented in the Commitments Register (document reference F1.5.3). In addition, The Applicants' Response to ExQ2:1.1.6 – Mitigation Hierarchy (S_D5_5.2) also provides a general summary of the mitigation hierarchy and measures taken, and the ten residual significant adverse effects which have been identified within the EIA, across all topics (all of which relate to the construction stage only).

- The majority of ecological effects have been avoided or mitigated. Some precautionary residual effects in terms of ecology and nature conservation would remain as a result of the partial, temporary loss (c.1.78ha) of Mill Brook Valley BHS and temporary habitat loss of 2.24ha of Priority Habitat within Mill Brook Valley BHS. However, in accordance with the outline Biodiversity Benefit Management Plan (document reference J11), there would also be some potential for long term benefits associated with onshore biodiversity, specifically, the onshore substations, associated access tracks and biodiversity benefit area at Lea Marsh Fields.
- Loss of, or harm to, buried archaeological remains and deposits of geoarchaeological and palaeoenvironmental interest; however this is on a precautionary basis as it is not possible at this stage of the Transmission Assets' evolution to know where all buried and unknown archaeological features are located. The Historic Environment will be protected in accordance with the measures set out in the outline Onshore and Intertidal WSI (CoT40) and the Code of Construction Practice (CoT35) to avoid and minimise effects.
- There would be temporary impacts on landscape character during construction, including on Landscape Character Areas 19a: Fylde Coastal Dunes (in association with the landfall/onshore export cable corridor) and 15d: Coastal Plain (in relation to the onshore substations). Residual visual impacts have also been anticipated in relation to the landfall/onshore export cable corridor, 400kV grid connection cable (including impacts on those using the beach, Blackpool Road Recreation Ground and on nearby PRoWs, National Cycle Routes and the occupiers of residential properties in close proximity to this work area) and the onshore substations (in relation to those usings the nearby Bridleways and PRoWs). Despite the iterative design approach, which includes landscape mitigation measures to reduce the effects on the Transmission Assets, significant landscape and visual effects remain as these are an unavoidable consequence of the construction of the permanent onshore substations.
- There would be a permanent loss of best and most versatile agricultural land, which is an unavoidable consequence of the construction of the permanent onshore infrastructure on agricultural land and the temporary disruption caused to farm holdings during construction. Opportunities have and will continue to be explored to reduce temporary disruption ad far as is reasonably practicable, however some temporary disruption is unavoidable.

6.3.1.2 In addition, the moderate effects arising from the Transmission Assets in relation to landscape character, visual effects and Green Belt have also been taken into consideration. As detailed in The Applicants' Hearing Summary of the Issue Specific Hearing 2: Day 1 (REP1-034), whilst moderate effects are not considered significant for the purposes of the EIA, Table 10.29 of Chapter 3, Volume 10 Landscape and Visual Resources (document reference F3.10) provides a summary of environmental matters, mitigation and monitoring on landscape character and visual impacts and Table 10.30 provides a summary of cumulative environmental effects, mitigation and monitoring. Both tables take into account all impacts, ranging from negligible to major adverse.

6.3.1.3 Irrespective of the significance or range of the impact, all impacts arising from the Transmission Assets have been taken into account within the planning balance.

6.4 Consideration of the planning balance and conclusion

6.4.1.1 NPS EN-1 paragraphs 3.2.11 and 3.2.12 confirm that the Secretary of State should give substantial weight to the need established in the NPS for electricity network infrastructure not covered by sections 15 – 21 of the Planning Act 2008 but which are directed into the regime by a direction pursuant to Section 35 of the Planning Act 2008.

6.4.1.2 NPS EN-1 paragraph 3.3.62 also confirms that here is a critical national need for nationally significant low carbon energy infrastructure projects, which includes energy transmission projects like the Transmission Assets directed to be considered under the Planning Act 2008 under a section 35 direction and comprise Critical National Priority Infrastructure (CNPI). The Transmission Assets, as an energy transmission CNP infrastructure project, will make a beneficial contribution to global efforts to reduce the effects of climate change and would represent a meaningful contribution achieving security of UK energy supplies by unlocking the potential for offshore wind generation from the Morgan Offshore Wind Project and the Morecambe Offshore Windfarm. As such, the Transmission Assets will make a material contribution to reducing the UK's current shortfall in meeting the policy ambition 50GW of offshore wind electricity generation by 2030 by facilitating almost 2GW of new offshore wind capacity.

6.4.1.3 Furthermore, the Transmission Assets would have a direct economic benefit, including employment and gross value added.

6.4.1.4 **Section 5.24** of this Planning Statement has also demonstrated that, although the Transmission Assets would result in some degree of harm to the Green Belt, in particular within Fylde Council administrative boundary, the starting point for decision making by the Secretary of State is that they should benefit from the presumptions applying to CNP infrastructure and 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, providing the mitigation hierarchy requirements of NPS EN-1 have been met. This includes development within Green Belts. (paragraph 4.2.17). This paragraph confirms that CNP infrastructure projects

are considered to have demonstrated that any exceptionality tests, in this case 'very special circumstances' to approve development in the Green Belt, have been met. Section 1.3, 1.4 and 1.5 of the Green Belt 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. As such, the starting point for determination should be that the test for very special circumstances has been met. Notwithstanding this approach, robust very special circumstances do exist, which justify and outweigh the harms to be caused to the Green Belt, by reason of inappropriateness and any other harms (Section 1.7 of REP4-092). The Applicants submitted a note on the request of the ExA to outline the inter-relationship of Green Belt and CNP infrastructure which expands on the matters above. The note (see REP6-176) was submitted at D6 to address HAP 45.

6.4.1.5 However, it is noted that for CNP infrastructure, NPS EN-1 paragraphs 4.2.10 to 4.2.12 confirm that Applicants must continue to show how their application meets the requirements of the NPSs in terms of applying the mitigation hierarchy, as well as any other legal and regulatory requirements. In addition, they should seek the advice of the appropriate SNCBs or other relevant statutory bodies and demonstrate that all residual effects are those that cannot be avoided, reduced or mitigated, setting out how any mitigation or compensatory measures will be monitored and reporting agreed to ensure success.

6.4.1.6 The Applicants have applied the mitigation hierarchy as part of the ES (document reference F1 – F4) and have complied with all other regulatory requirements such as HRA and MCZ. A Commitments Register (document reference F1.5.3) is submitted with the application to secure mitigation or compensatory measures. In addition, the Applicants have also sought advice from appropriate SNCBs and adequate consultation and engagement has been carried out, as demonstrated by the Consultation Report (document reference E1).

6.4.1.7 The Applicants' Response to ExQ2:1.1.6 – Mitigation Hierarchy (S_D5_5.2) provides further detail on the 10 residual significant effects following the application of the Mitigation Hierarchy. The majority of these are temporary and limited to the construction phase. These residual significant effects, including some which are considered precautionary, relate to temporary ecological impacts, archaeological remains, loss of BMV and impact to farm holdings, landscape character and visual impacts on nearby PRoWS and bridleways and some residential receptors, largely in proximity to the substations.

6.4.1.8 The exceptions to the presumption of consent for CNP infrastructure are set out in NPS EN-1 paragraph 4.1.7. Whilst this paragraph reiterates that the need case will outweigh the residual effects in all but the most exceptional cases, it also states that those exceptions include residual impacts onshore and offshore which present an unacceptable risk to, or unacceptable interference with, human health and public safety, defence, irreplaceable habitats or unacceptable risk to the achievement of net zero and to unacceptable interference offshore to navigation, or onshore to flood and

coastal erosion risk. None of the above exceptions apply to the Transmission Assets which means that as qualifying CNP infrastructure, if needed in the planning balance the Transmission Assets benefit from the presumption that the need outweighs any residual impacts.

6.4.1.9 For all the above reasons therefore, the Examining Authority and the Secretary of State can conclude under section 104 of the Planning Act 2008 that the Transmission Assets would be in accordance with relevant NPSs, as established in the NPS tracker (document reference J26). Furthermore, the Transmission Assets:

- would not lead to the UK being in breach of any of its international obligations (section 104(4);
- would not lead to the Secretary of State being in breach of any duty imposed by or under any enactment (section 104(5)); and
- would not be unlawful by virtue of any enactment (section 104(6)).

6.4.1.10 The Secretary of State can be satisfied that the above benefits of the proposed development outweigh any adverse impacts (section 104(7)) and that there is no condition prescribed for deciding the application otherwise than in accordance with the relevant NPSs (section 104(8).

6.4.1.11 On this basis, under the terms of section 104 of the Planning Act 2008, the Transmission Assets should be consented.

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