



# **MORGAN AND MORECAMBE OFFSHORE WIND FARMS: TRANSMISSION ASSETS**

**Without Prejudice Removal of Lytham Moss - Environmental Statement Addendum**



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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).                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| Biodiversity benefit                  | <p>An approach to development that leaves biodiversity in a better state than before. Where a development has an impact on biodiversity, developers are encouraged to provide an increase in appropriate natural habitat and ecological features over and above that being affected.</p> <p>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.</p> |
| Code of Construction Practice         | A document detailing the overarching principles of construction, contractor protocols, construction-related environmental management measures, pollution prevention measures, the selection of appropriate construction techniques and monitoring processes.                                                                                                                                                                                                                                                                                                                                                                                                         |
| Commitment                            | This term is used interchangeably with mitigation and enhancement measures. The purpose of commitments is to avoid, prevent, reduce or, if possible, offset significant adverse environmental effects. Primary and tertiary commitments are taken into account and embedded within the assessment set out in the ES.                                                                                                                                                                                                                                                                                                                                                 |
| 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.                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| 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.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| 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.                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |

| Term                                                          | Meaning                                                                                                                                                                                                                                                                                                                                                                                                                          |
|---------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 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.                                                                                                                                                      |
| Intertidal area                                               | The area between Mean High Water Springs and Mean Low Water Springs.                                                                                                                                                                                                                                                                                                                                                             |
| Intertidal Infrastructure Area                                | The temporary and permanent areas between MLWS and MHWS.                                                                                                                                                                                                                                                                                                                                                                         |
| 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 bay 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 Highway Authority                                       | A body responsible for the public highways in a particular area of England and Wales, as defined in the Highways Act 1980.                                                                                                                                                                                                                                                                                                       |
| 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.                                                                                                                                                                                                     |
| Marine licence                                                | The Marine and Coastal Access Act 2009 requires a marine licence to be obtained for licensable marine activities. Section 149A of the Planning Act 2008 allows an applicant for to apply for 'deemed marine licences' in English waters as part of the development consent process                                                                                                                                               |
| 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.                                                                                                                                                                                                                                                                                                                                                                      |
| 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                                                                                                                                                           |

| Term                                              | Meaning                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
|---------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                   | <p>cables and associated grid connection infrastructure such as circuit breaker compounds.</p> <p>Also referred to in this report as the Transmission Assets, for ease of reading.</p>                                                                                                                                                                                                                                                                                                                                              |
| 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 export cables, landfall and onshore infrastructure required to connect the Morgan Offshore Wind Project to the National Grid.                                                                                                                                                                                                                                                                                                                                                                                          |
| 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 and Net Zero in 2023 and adopted in 2024.                                                                                                                                                                                                                                                                                                                                                                                                             |
| Offshore booster station                          | A fixed structure located along the offshore export cable route, containing electrical equipment to ensure bulk wind farm capacity can be fully transmitted to the onshore substations.                                                                                                                                                                                                                                                                                                                                             |
| Offshore substation platform(s)                   | A fixed structure located within the wind farm sites, containing electrical equipment to aggregate the power from the wind turbine generators and convert it into a more suitable form for export to shore.                                                                                                                                                                                                                                                                                                                         |
| 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 Permanent Infrastructure Area            | The area within the Transmission Assets Offshore Order Limits (up to MLWS) where the permanent offshore electrical infrastructure (i.e. offshore export cables) will be located.                                                                                                                                                                                                                                                                                                                                                    |
| Offshore Order Limits                             | See Transmission Assets Order Limits: Offshore (below).                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| Offshore substation platform(s)                   | A fixed structure located within the wind farm sites, containing electrical equipment to aggregate the power from the wind turbine generators and convert it into a more suitable form for export to shore.                                                                                                                                                                                                                                                                                                                         |
| Onshore export cables                             | The cables which would bring electricity from the landfall to the onshore substations.                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| 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 MHWS. Comprising the offshore export cable corridor from MHWS to the transition joint bay, onshore export cable corridor, onshore substations and 400 kV grid connection cable corridor, and associated temporary and permanent infrastructure including temporary and permanent compound areas and accesses. Those parts of the Transmission Assets Order Limits proposed only for ecological mitigation and/or 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                                                                                                                                                                                            |

| Term                                                    | Meaning                                                                                                                                                                                                                                                                                                                                         |
|---------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                         | and to adjust the power quality and power factor, as required to meet the UK Grid Code for supply to the National Grid.                                                                                                                                                                                                                         |
| 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.                                                                                                                                                                                                                                                               |
| Scour protection                                        | Protective materials to avoid sediment being eroded away from the base of the foundations due to the flow of water.                                                                                                                                                                                                                             |
| 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.                                                                                                                                                                                                                                         |
| 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              | <p>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.</p> <p>Also referred to in this report as the Offshore Order Limits, for ease of reading.</p>                                   |
| Transmission Assets Order Limits: Onshore               | <p>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).</p> <p>Also referred to in this report as the Onshore Order Limits, for ease of reading.</p> |

## Acronyms

| Acronym | Meaning                                            |
|---------|----------------------------------------------------|
| AEoI    | Adverse Effect on Integrity                        |
| AMM     | Active Management Measure                          |
| BAE     | BAE Systems                                        |
| CAA     | Civil Aviation Authority                           |
| CA      | Compulsory Acquisition                             |
| CAP     | Civil Aviation Publication                         |
| CIP     | Copenhagen Infrastructure Partners                 |
| CNP     | Critical National Priority                         |
| CoCP    | Code of Construction Practice                      |
| CoT     | Project Commitment                                 |
| CBRA    | Cable Burial Risk Assessment                       |
| CfD     | Contracts for Difference                           |
| CMS     | Construction Method Statement                      |
| CSIP    | Cable Specification and Installation Plan          |
| CTMP    | Construction Traffic Management Plan               |
| DCO     | Development Consent Order                          |
| DECC    | Department of Energy and Climate Change            |
| Defra   | Department for Environment, Food and Rural Affairs |
| DESNZ   | Department for Energy Security & Net Zero          |
| dML     | Deemed Marine Licence                              |
| EnBW    | Energie Baden-Württemberg AG                       |
| EIA     | Environmental Impact Assessment                    |
| EMP     | Environmental Management Plan                      |
| ES      | Environmental Statement                            |
| EWG     | Expert Working Group                               |
| FLL     | Functionally Linked Land                           |
| HDD     | Horizontal Directional Drilling                    |
| HGV     | Heavy goods vehicle                                |
| HNDR    | Holistic Network Design Review                     |
| HVAC    | High Voltage Alternating Current                   |
| LAT     | Lowest Astronomical Tide                           |
| MCA     | Maritime and Coastguard Agency                     |

| Acronym | Meaning                                       |
|---------|-----------------------------------------------|
| MCZ     | Marine Conservation Zone                      |
| MDS     | Maximum Design Scenario                       |
| MHWS    | Mean High Water Springs                       |
| MLWS    | Mean Low Water Springs                        |
| MMO     | Marine Management Organisation                |
| MPS     | Marine Policy Statement                       |
| NGESO   | National Grid Electricity System Operator     |
| NPS     | National Policy Statement                     |
| NSIP    | Nationally Significant Infrastructure Project |
| O&M     | Operation and Maintenance                     |
| OSP     | Offshore Substation Platform                  |
| OTNR    | Offshore Transmission Network Review          |
| PDE     | Project Design Envelope                       |
| PRoW    | Public rights of way                          |
| SAC     | Special Areas of Conservation                 |
| SAR     | Search and Rescue                             |
| SPA     | Special Protection Area                       |
| SNCBs   | Statutory Nature Conservation Bodies          |
| SSSI    | Site of Special Scientific Interest           |
| TEP     | Technical Engagement Plan                     |
| TJB     | Transition Joint Bay                          |
| UK      | United Kingdom                                |
| UXO     | Unexploded Ordnance                           |

## Units

| Unit            | Description        |
|-----------------|--------------------|
| %               | Percentage         |
| km              | Kilometres         |
| km <sup>2</sup> | Kilometres squared |
| kV              | Kilovolt           |
| m               | Metres             |
| m <sup>3</sup>  | Metres cubed       |

# 1 Introduction

- 1.1.1.1 On 08 July 2026, the Secretary of State published a letter (the SoS's letter) (C3-001) requesting, without prejudice, the removal of Lytham Moss and land south of Newton-with-Scales as mitigation areas to address temporary disturbance and temporary habitat loss impacts to onshore ornithology species. Furthermore, the Secretary of State requested, on a without prejudice basis, the removal of all powers related to the temporary mitigation area at Lytham Moss. Consequentially, this requires the removal of Lytham Moss from the Development Consent Order (DCO) Limits ('the Order Limits') by the Applicants (Morgan Offshore Wind Limited ('Morgan OWL') and Morecambe Offshore Windfarm Limited ('Morecambe OWL')).
- 1.1.1.2 In accordance with the requirements of The Infrastructure Planning (EIA) Regulations 2017 (as amended) (the 'EIA Regulations'), the Applicants have undertaken a review of the EIA and the conclusions set out within the Environmental Statement (ES) in relation to the without prejudice removal of Lytham Moss mitigation area from the Order Limits. The Applicants have considered whether this update and the implementation of seasonal working patterns and screening as alternative mitigation to address temporary impacts on onshore ornithology species would result in any new or materially different likely significant environmental effects relative to those stated in the ES.
- 1.1.1.3 The Applicants confirm that these measures fall within the parameters of the maximum design scenario that forms the basis of the assessments within the ES. The maximum design parameters for the Transmission Assets considered within this ES Addendum therefore remain in line with those of the original Maximum Design Scenario described in the ES (refer to Volume 1, Chapter 3: Project description (REP6-038)).
- 1.1.1.4 As demonstrated in **Section 2**, the without prejudice removal of the Lytham Moss mitigation area and the focus on alternative mitigation measures (seasonal working patterns and screening) will not lead to any materially new or different environmental effects to those previously assessed and reported within the ES.
- 1.1.1.5 Each sub-section below considers the onshore and combined onshore/offshore ES topics contained within the ES submitted in support of the DCO Application. The Applicants note that the removal of the Lytham Moss mitigation area means that no new land is being introduced and, consequently, is covered by the existing datasets and previously surveyed areas used to inform the conclusions of the ES.
- 1.1.1.6 The assessments, conclusions and methodology contained within the ES have been used as the basis of the assessments within this without prejudice ES Addendum. Mitigation measures are set out in the DCO Application and secured through the requirements of the draft Development Consent Order (REP6-013). These mitigation measures are also secured in the Without Prejudice Removal of Lytham Moss and Morgan Land Powers - draft Development Consent Order (S\_SoSQ\_34).

- 1.1.1.7 If the without prejudice Order Limits are approved, it should be considered that any ES figures which are impacted as a result of the Order Limit change are still valid regardless of the inclusion of Lytham Moss. All onshore plans have been updated to remove Lytham Moss and provided as without prejudice versions. The Application Guide (A4/F15) sets out the documents that have been updated in relation to the SoS's letter (C3-001).

## **2 ES Addendum**

### **2.1 Geology, hydrology and ground conditions**

#### **2.1.1 Baseline**

2.1.1.1 The relevant land at Lytham Moss comprises agricultural land and is characterised by Secondary B (undifferentiated) bedrock aquifer. There are no groundwater Source Protection Zones within the relevant land subject to without prejudice removal from the Order Limits.

2.1.1.2 Overall, the geology, hydrogeology and ground conditions baseline features remain unchanged from those previously identified and assessed within the ES submitted in support of the DCO Application.

#### **2.1.2 Environmental Appraisal**

2.1.2.1 The without prejudice removal of the Lytham Moss environmental mitigation area will not affect any additional receptors or change the magnitude of impacts (or lead to any different impacts) to receptors already assessed in the ES.

2.1.2.2 The proposed mitigation measures in relation to geology, hydrogeology and ground conditions do not rely on the environmental mitigation area at Lytham Moss.

2.1.2.3 The without prejudice removal of the environmental mitigation area at Lytham Moss, therefore, does not change the conclusions of the EIA in respect of geology, hydrogeology or ground conditions as reported in Chapter 1: Geology, Hydrogeology and Ground Conditions (REP6-050).

### **2.2 Hydrology and flood risk**

#### **2.2.1 Baseline**

2.2.1.1 The environmental mitigation area at Lytham Moss is partially located within the hydrology and flood risk study area, and it falls between the Water Framework Directive catchments of the Main Drain (Ribble) and Liggard Brook (as shown on Figure 2.2 Volume 3 Figures, Part 1 of 7 (REP5a-026)). More broadly, it is located within the Ribble Management Catchment. It does not intersect any Ordinary Watercourses; however, there are drains along its boundaries. The closest Main River is the Branch Drain.

2.2.1.2 The Lytham Moss mitigation area is partially located within flood zone 3 (refer to Volume 3, Annex 2.3: Flood risk assessment - Parts 1 to 3 (REP6-032, AS-042 and AS-044)).

2.2.1.3 Overall, the hydrology and flood risk baseline features remain unchanged from those previously identified and assessed within the ES (Chapter 2: Hydrology and Flood Risk (REP6-059)).

## **2.2.2 Environmental Appraisal**

- 2.2.2.1 The without prejudice removal of Lytham Moss from the Order Limits will not affect the sensitivity of any receptors or change the magnitude of impacts on the receptors as previously assessed.
- 2.2.2.2 Therefore, the conclusions of the EIA will not change as a result of the without prejudice removal of the Lytham Moss mitigation area in respect of hydrology and flood risk as reported in Chapter 2: Hydrology and Flood Risk (REP6-059).

## **2.3 Onshore ecology and nature conservation**

### **2.3.1 Baseline**

- 2.3.1.1 A suite of ecological surveys were undertaken between 2022 and 2024 to inform the Preliminary Environmental Information Report (PEIR) and ES. These surveys included an Extended Phase 1 Habitat Survey which covered the mitigation area at Lytham Moss. The Lytham Moss mitigation area is characterised by poor semi-improved and improved grassland as set out in Volume 3, Annex 3.3: Phase 1 habitat, national vegetation classification and hedgerow survey technical report (REP5-039).
- 2.3.1.2 Overall, baseline features remain unchanged from those identified and assessed with the ES submitted in support of the DCO Application.

### **2.3.2 Environmental Appraisal**

- 2.3.2.1 The assessment of onshore ecological and nature conservation impacts does not rely on the Lytham Moss area to mitigate impacts on relevant ecological receptor
- 2.3.2.2 The without prejudice removal of the Lytham Moss mitigation area will not affect any additional receptors, change the magnitude of impacts or cause any different impacts to receptors already assessed in the ES.
- 2.3.2.3 Therefore, the conclusions of the EIA will not change as a result of the without prejudice removal of the Lytham Moss mitigation area in respect of onshore ecology and nature conservation as reported in Chapter 3: Onshore Ecology and Nature Conservation (APP-076).

## **2.4 Onshore and intertidal ornithology**

### **2.4.1 Baseline**

- 2.4.1.1 The Lytham Moss mitigation area was surveyed as part of the wintering and migratory bird survey and breeding bird survey programme undertaken across the 2022/23 and 2023/24 seasons, as documented in Volume 3, Annex 4.2: Wintering and migratory birds technical report (APP-092) and Volume 3, Annex 4.1: Breeding birds technical report (APP-091), respectively. The surveys identified that the Lytham Moss mitigation area is an important area for birds and contains large concentrations of wildfowl and waders. The area is within land mapped

as Functionally Linked Land for geese and swans, and it falls within a Biological Heritage Site. As described previously, the land use at the Lytham Moss mitigation area comprises primarily arable areas.

- 2.4.1.2 Overall, baseline features remain unchanged from those identified and assessed within the ES submitted in support of the DCO Application.

## **2.4.2 Environmental Appraisal**

- 2.4.2.1 The Lytham Moss mitigation area sought to mitigate temporary impacts of habitat loss and disturbance on non-breeding wader and waterfowl species (in particular pink-footed geese and whooper swan) by providing alternative habitat for relevant species during the construction period.

- 2.4.2.2 As set out in the Alternative Ornithology Mitigation Note – Temporary (C1-029.29), mitigation measures comprising seasonal working restrictions and screening between October and March (inclusive) were proposed to be implemented within the areas shown on Figure 1-3 (C1-029.29) in the vicinity of Lytham Moss and south of Newton-with-Scales as an alternative option to mitigation areas at these locations. These measures avoid the impacts of habitat loss and disturbance on the relevant non-breeding waterfowl species (pink-footed goose and whooper swan) and waders by removing the source of disturbance during the sensitive overwintering period, rather than providing alternative habitat.

- 2.4.2.3 The assessment of onshore and intertidal ornithology in the ES assumes the implementation of mitigation to reduce construction-related disturbance to wader and waterbird species. However, the alternative mitigation measures (seasonal working restrictions and screening) fall within the parameters of the maximum design scenario assessed within the ES. As such, the without prejudice removal of the Lytham Moss mitigation area will not affect any additional receptors or cause any materially different impacts to receptors already assessed in the ES.

- 2.4.2.4 The Applicants provided information to support appropriate assessment considering the alternative mitigation measures and concluded no AEol, with the impacts of temporary habitat loss and disturbance assessed as negligible (C1-029.29). The mitigation measures and their assessed effectiveness are the same irrespective of whether they are considered under the EIA Regulations or the Habitats Regulations; the conclusion of no AEol reached in C1-029.29 is therefore considered to apply equally for EIA purposes, and further supports the conclusion that the alternative mitigation measures would not materially alter the magnitude of effects assessed in the ES, nor result in any change to the conclusions reported therein.

- 2.4.2.5 On this basis, the conclusions of the EIA will not change as a result of the without prejudice removal of the Lytham Moss mitigation area in respect of onshore and intertidal ornithology as reported in Chapter 4: Onshore and Intertidal Ornithology (REP5-040).

## **2.5**      **Historic environment**

### **2.5.1**      **Baseline**

- 2.5.1.1      There are no Scheduled Monuments or Listed Buildings within the Lytham Moss mitigation area, and it is not located within a Conservation Area or Registered Park and Garden. The closest historic environment receptors remain largely as per those identified in Volume 3, Chapter 5: Historic environment (APP-096).
- 2.5.1.2      Overall, baseline features remain unchanged from those identified and assessed within the ES submitted in support of the DCO Application.

### **2.5.2**      **Environmental Appraisal**

- 2.5.2.1      The without prejudice removal of the Lytham Moss mitigation area will remove the potential for impacts on buried archaeology from the creation of the temporary scrapes. No additional receptors will be affected, and there will be no change in the magnitude of impacts already assessed in the ES. Potential impacts on historic environment receptors outside of the Lytham Moss mitigation area remain as previously assessed and will be mitigated prior to and during construction, as informed by pre-construction archaeological mitigation excavations (where identified to be required), secured through the Outline Onshore and Intertidal Written Scheme of Investigation (WSI) (REP3-026).
- 2.5.2.2      Therefore, the conclusions of the EIA will not change as a result of the without prejudice removal of the Lytham Moss mitigation area in respect of historic environment as reported in Chapter 5: Historic Environment (APP-096).

## **2.6**      **Land use and recreation**

### **2.6.1**      **Baseline**

- 2.6.1.1      The agricultural land at the Lytham Moss mitigation area comprises Grade 2 land (as set out on the provisional Agricultural Land Classification (ALC) maps (Natural England, 2024)) and is considered best and most versatile land (see Volume 3, Annex 6.1: Published agricultural land classification and soils data (APP-105)).
- 2.6.1.2      Agricultural land quality was confirmed using published data: no soil surveys were undertaken within the Lytham Moss mitigation area for the EIA.
- 2.6.1.3      Bridleway 5.2-BW 18 is adjacent to the western boundary of the Lytham Moss mitigation area (as shown in Volume 3, Annex 6.3: Published recreational resources plan (APP-107)). The bridleway will not be affected by the use of the Lytham Moss mitigation area and no temporary diversions or closures are required.
- 2.6.1.4      Overall, the land use and recreational baseline remain unchanged from that identified within the ES submitted in support of the DCO Application.

## **2.6.2 Environmental Appraisal**

- 2.6.2.1 The purpose of the Lytham Moss mitigation area is to provide temporary alternative habitat during the overwintering months for key bird species. The potential impacts of temporary disruption to the operation of farm holdings were considered in the assessment (reported in Volume 3, Chapter 6: Land use and recreation (APP-104)) as part of the overall disruption to farming management as a result of the Transmission Assets Project. The without prejudice removal of the Lytham Moss mitigation area would avoid the temporary disruption of farming practices at this particular holding; however, the conclusions of the EIA with regard to impacts on farm holdings (as reported in Chapter 6: Land use and recreation (APP-104)) will remain the same.
- 2.6.2.2 Therefore, the conclusions of the EIA will not change as a result of the without prejudice removal of the Lytham Moss mitigation area in respect of land use and recreation as reported in Chapter 6: Land Use and Recreation (APP-104).

## **2.7 Traffic and transport**

### **2.7.1 Baseline**

- 2.7.1.1 The assessment of traffic and transport effects within the ES - Volume 3, Chapter 7: Traffic and Transport (APP-108) was informed by assessing the forecast change in traffic flows (as a result of construction traffic associated with the Transmission Assets Project) relative to the baseline traffic conditions. The without prejudice removal of the Lytham Moss mitigation area and the implementation of seasonal working would not change the baseline from that assessed within the ES submitted in support of the DCO Application.

### **2.7.2 Environmental Appraisal**

- 2.7.2.1 The without prejudice removal of Lytham Moss mitigation area would result in the removal of accesses OAR\_ECO\_MGMC\_1, OAR\_ECO\_MGMC\_2 and TAT\_ECO\_MGMC\_1. The without prejudice removal of the Lytham Moss mitigation area and the implementation of seasonal working would not result in a change to the worst-case peak daily traffic numbers (which formed the basis of the traffic and transport assessment) or the duration of the onshore construction programme. The assessed maximum design scenario for HGV trips is presented within Table 7.21 of Volume 3, Chapter 7: Traffic and transport (APP-108) and the Outline Construction Traffic Management Plan (CTMP) (REP7-016) includes a commitment to ensure compliance with these numbers. The requirement to produce a detailed CTMP in accordance with the Outline CTMP is secured by Requirement 9 of the draft Development Consent Order (DCO) (S\_SoSQ\_34) Schedules 2A & 2B. Therefore, there is no requirement to further review the assessment.
- 2.7.2.2 The without prejudice removal of the Lytham Moss mitigation area and implementation of seasonal working will not result in any new or different likely significant environmental construction effects in respect

of traffic and transport. Therefore, the conclusions of the EIA will not change as a result of the without prejudice removal of the Lytham Moss mitigation area and implementation of seasonal working in respect of traffic and transport during the construction or operation and maintenance phase.

## **2.8 Noise and vibration**

### **2.8.1 Baseline**

- 2.8.1.1 The closest noise sensitive receptors to the Lytham Moss mitigation area remain unchanged from those at which impacts were assessed and reported in ES - Volume 3, Chapter 8: Noise and Vibration (REP6-063).
- 2.8.1.2 The baseline sound surveys undertaken in 2022 and 2023 included the locations at Peg's Lane and Peel Hall Farm, representative of the sound climate of receptors located close to the Lytham Moss mitigation area.
- 2.8.1.3 The noise and vibration baseline remains unchanged from that identified and assessed within the ES submitted in support of the DCO Application.

### **2.8.2 Environmental Appraisal**

- 2.8.2.1 No construction activities are proposed at the Lytham Moss mitigation area with the exception of the creation and restoration of scrapes. Any noise impacts associated with these localised activities have been considered in the overall construction noise and vibration.
- 2.8.2.2 The without prejudice removal of the Lytham Moss mitigation area will avoid this source of construction noise; however, the magnitude of the overall impact of construction noise at the nearest receptor is unlikely to change. The without prejudice removal of Lytham Moss will not result in any new or different impacts from what was assessed in Volume 3, Chapter 8: Noise and vibration (REP6-063).
- 2.8.2.3 There will be no change to the worst-case peak daily traffic numbers compared to that assessed in the ES as a result of without prejudice removal of Lytham Moss mitigation area and implementation of seasonal working. Therefore, the construction traffic noise impacts will remain unchanged from those assessed in the ES (REP6-063) and reported in Appendix C of Volume 3 Annex 8.2: Construction noise and vibration (REP6-065).
- 2.8.2.4 Potential noise and vibration impacts will be controlled by the application of mitigation measures set out within Table 1.6 of Volume 3, Annex 8.2: Construction noise and vibration (REP6-065), the Outline Code of Construction Practice (CoCP) (S\_SoSQ\_53) and the Outline Construction Noise and Vibration Management Plan (REP6-083).
- 2.8.2.5 The without prejudice removal of the Lytham Moss mitigation area will not affect any additional receptors or cause any different impacts to receptors already assessed in the ES.

- 2.8.2.6 Therefore, the conclusions of the EIA will not change as a result of the without prejudice removal of the Lytham Moss mitigation area and implementation of seasonal working in respect of noise and vibration as reported in Chapter 8: Noise and vibration (REP6-063).

## **2.9 Air quality**

### **2.9.1 Baseline**

- 2.9.1.1 There are no designated Air Quality Management Areas (AQMAs) within the air quality study area, indicating that air quality falls below the relevant objectives and limit values for the main air pollutants.
- 2.9.1.2 Background pollutant concentrations of NO<sub>2</sub>, PM<sub>10</sub> and PM<sub>2.5</sub> at the Lytham Moss mitigation area and across the study area are considered in Volume 3, Chapter 9: Air quality (APP-121) are below the air quality limit values as set out in the UK's Air Quality Standards Regulations 2010.
- 2.9.1.3 This baseline remains unchanged from that identified and assessed within the ES submitted in support of the DCO Application (APP-121).

### **2.9.2 Environmental Appraisal**

- 2.9.2.1 Potential impacts of the without prejudice removal of Lytham Moss mitigation area remain the same as previously assessed within Volume 3, Chapter 9: Air quality (APP-121), namely nuisance impacts caused by dust emissions from construction works, vehicles and plant. The without prejudice removal of the Lytham Moss mitigation area and implementation of seasonal working will not affect any additional receptors or cause any different impacts to those assessed in the ES. There will be no change to the air quality impacts from the construction traffic associated with the Project (as worst-case peak daily traffic numbers will not change) compared to that assessed in the ES.
- 2.9.2.2 As detailed in Section 10.7 of Volume 3, Chapter 9: Air quality (APP-121), air pollution and dust generation would be appropriately controlled by the application of best practice mitigation measures set out within the Outline Dust Management Plan (REP6-081) and the Outline CoCP (S\_SoSQ\_53).
- 2.9.2.3 As outlined in Table 9.14 of Volume 3, Chapter 9: Air quality (APP-121), the impact on human or ecological receptors arising from air emissions generated by vehicle traffic during operation and maintenance was scoped out of the assessment. This was on the basis that the number of additional two-way vehicle movements is unlikely to exceed the EPUK and IAQM indicative threshold criteria set out in section 9.10.3 of the ES chapter (APP-121). The without prejudice removal of the Lytham Moss mitigation area and implementation of seasonal working will not lead to an exceedance of these threshold criteria, and therefore the impacts do not require further consideration.
- 2.9.2.4 The conclusions of the EIA will not change as a result of the without prejudice removal of the Lytham Moss mitigation area in respect of air quality as reported in Chapter 9: Air quality (APP-121).

## 2.10 Landscape and visual resources

### 2.10.1 Baseline

- 2.10.1.1 The Lytham Moss mitigation area does not lie within any nationally designated landscapes or any other local landscape designations and is not within Green Belt.
- 2.10.1.2 There is no change to the landscape susceptibility, value or sensitivity of the land within the revised extents of the Onshore Order Limits from what has already been identified and assessed in Volume 3, Chapter 10: Landscape and visual resources (APP-123); illustrated in Figures Part 6 of 7 (REP5a-031); and Volume 3, Annex 10.5 Tree survey and arboricultural impact assessment Part 1 of 2 and 2 of 2 (APP-128 and APP-129).
- 2.10.1.3 Overall, baseline features remain unchanged from those identified within the ES submitted in support of the DCO Application.

### 2.10.2 Environmental Appraisal

- 2.10.2.1 The purpose of the Lytham Moss area and the implementation of seasonal working patterns and screening is to mitigate temporary impacts on ornithology receptors. The use of temporary fencing has been considered within the ES. Furthermore, the creation and reinstatement of the temporary scrapes did not require any changes to trees or hedgerows, or introduce new impacts on landscape and visual receptors to those already assessed in Volume 3, Chapter 10: Landscape and visual resources (APP-123).
- 2.10.2.2 Therefore, the conclusions of the EIA will not change as a result of the without prejudice removal of the Lytham Moss mitigation area in respect of landscape and visual resources as reported in Chapter 10: Landscape and visual resources (APP-123).

## 2.11 Other environmental topics

- 2.11.1.1 Due to the scale and nature of the without prejudice removal of the Lytham Moss mitigation area, the following topics are unlikely to be affected, and so it is considered appropriate that these are scoped out of the considerations for this ES Addendum:
- Aviation and radar;
  - Socio-economics;
  - Climate change;
  - Human health; and
  - Transboundary effects.
- 2.11.1.2 In addition, due to the distance of the relevant land subject to the without prejudice reduction of the Order Limits from the coast, the assessment conclusions of the offshore topics within the ES will not be affected.

- 2.11.1.3 Finally, as the changes do not introduce any new environmental receptors or additional impacts on previously identified receptors, there are no cumulative impacts which differ from those assessed in the ES nor are there any inter-related effects which differ from those assessed in the ES.

## 2.12 Conclusions

- 2.12.1.1 The without prejudice removal of Lytham Moss mitigation area represents a minor change to the Transmission Assets project previously assessed in the DCO Application. This without prejudice reduction of the Onshore Order Limits does not introduce any new environmental receptors or additional impacts on previously identified receptors. Seasonal working and the use of screening during the overwintering period within the vicinity of Lytham Moss and south of Newton-with-Scales falls within the parameters of the maximum design scenario and has therefore been assessed within the ES.
- 2.12.1.2 Therefore, the without prejudice removal of the Lytham Moss mitigation area and the implementation of seasonal working practices and screening does not lead to any materially new or different environmental effects to those previously assessed within the ES. On this basis, the conclusions of the ES remain unchanged, and the mitigation measures secured by the draft DCO (S\_SoSQ\_34) remain sufficient.

### 3           **References**

Natural England (2024) Provisional Agricultural Land Classification (ALC) online mapping data. Available: [Provisional Agricultural Land Classification \(ALC\) \(England\)](#) (Accessed July 2026).