



MORGAN AND MORECAMBE OFFSHORE WIND FARMS: TRANSMISSION ASSETS

Without Prejudice Removal of Lytham Moss - Information to Support Appropriate Assessment Addendum



Deadline: SoS Letter 3
Application Reference: EN020028

Document Numbers:
MOR001-FLO-CON-CAG-RPT-0180
MRCNS-J3303-RPS-19123
Document Reference: S_SoSQ_57

July 2026
F01

Document status					
Version	Purpose of document	Approved by	Date	Approved by	Date
F01	SoS Letter 3	GL	July 2026	AB	July 2026

Prepared by:

**Morgan Offshore Wind Limited,
Morecambe Offshore Windfarm Ltd**

Prepared for:

**Morgan Offshore Wind Limited,
Morecambe Offshore Windfarm Ltd**

Contents

1	WITHOUT PREJUDICE HRA STAGE 2 ISAA ADDENDUM	10
1.1	Overview	10
1.2	Need for ISAA Addendum	10
1.3	Approach to the ISAA Addendum	13
1.4	Without Prejudice Updates	16
1.5	Implications for the ISAA Conclusions	39
1.5.2	Temporary disturbance, displacement and habitat loss	39
1.5.3	Permanent loss of supporting habitat	39
1.5.4	Overall conclusion on integrity	39
1.6	Summary	40

Tables

Table 1: Original and revised wording of commitments CoT107 and CoT120 as outlined in the Commitments Register	13
Table 2: Without prejudice updates to REP6-024	17

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	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.
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
	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 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	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.

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 ²	Kilometres squared
kV	Kilovolt
m	Metres
m ³	Metres cubed

1 Without Prejudice HRA Stage 2 ISAA Addendum

1.1 Overview

- 1.1.1.1 This document is a without prejudice addendum to the Morgan and Morecambe Offshore Wind Farms: Transmission Assets (the 'Transmission Assets') Habitats Regulations Assessment Stage 2 Information to Support Appropriate Assessment (ISAA) Part 3 (REP6-024). It has been prepared by the Applicants (Morgan Offshore Wind Limited ('Morgan OWL') and Morecambe Offshore Windfarm Limited ('Morecambe OWL')) in response to the letter published by the Secretary of State on 08 July 2026 (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 as well as the removal of all powers related to the temporary mitigation area at Lytham Moss. This addendum also reflects Natural England's final position that Adverse Effect on Integrity (AEoI) for the Ribble and Alt Estuaries Special Protection Area (SPA) and Ramsar site can be ruled out without the need for mitigation.
- 1.1.1.2 The Applicants have reviewed the ISAA and the conclusions set out within it and have considered whether the updates described in this addendum would result in any new or materially different conclusions.
- 1.1.1.3 As set out in **Section 1.5**, it has been concluded that the updates do not alter the conclusions of the ISAA and AEoI from the project alone, and in combination with other projects and plans can be ruled out beyond reasonable scientific doubt for all relevant European sites.

1.2 Need for ISAA Addendum

- 1.2.1.1 Points 10 and 11 of the SoS's letter state:
- 10. Noting that the Applicants have not made the case that avoidance/reduction of temporary disturbance effects is not feasible, and without prejudice to the Secretary of State's conclusions, the Applicants are requested to update the outline Ecological Management Plan, the associated appendices and all other documents relevant to mitigation for temporary impacts to onshore ornithology, including the Commitments Register, to remove scenarios relying on measures at Lytham Moss and land south of Newton with Scales to provide mitigation for temporary disturbance and temporary habitat loss impacts to ornithology species (i.e. scenarios 1 and 2). These documents should retain the scenario which utilises seasonal working and screening to avoid adverse effects (i.e. scenario 3).*
- 11. Without prejudice to Secretary of State's conclusions, the Applicants are requested to update documentation relating to CA, TP, and all other land powers, to amend the proposed order limits and dDCO if appropriate and remove all powers related to temporary mitigation areas in scenarios 1 and 2 e.g. temporary powers over plots 06-078 and 07-002 at Lytham Moss.*

- 1.2.1.2 The Applicants proposed three mitigation scenarios to address temporary construction effects on onshore ornithology. As set out in the Alternative Ornithology Mitigation Note – Temporary (C1-029.29), these were:
- **Scenario 1** – provision of a temporary mitigation area at Lytham Moss and on land south of Newton-with-Scales;
 - **Scenario 2** – provision of a temporary mitigation area at Lytham Moss only, plus the implementation of seasonal working practices and screening of construction works in the vicinity of land south of Newton-with-Scales; and
 - **Scenario 3** – seasonal working and screening in the sensitive areas at both Lytham Moss and land south of Newton-with-Scales.
- 1.2.1.3 Scenario 1 was relied upon in the Applicants' HRA Stage 2 ISAA Part 3 (REP6-024) and updated information presented in Appendix F of the oEMP (C2-029.16) to enable AEoI to be ruled out for several qualifying features and SPAs.
- 1.2.1.4 Scenarios 2 and 3 were alternative mitigation options subsequently proposed and included within the outline Ecological Management Plan (oEMP) (C2-029.16) that could be implemented in addition to, or in place of, Scenario 1, should it be considered that the mitigation benefit achievable with Scenario 1 alone was not possible.
- 1.2.1.5 All three scenarios were secured by Requirement 12 (Ecological Management Plan) within Schedules 2A and 2B of the draft Development Consent Order (DCO) (REP6-013).
- 1.2.1.6 Scenario 1 was agreed with Natural England during the DCO Examination Process (C1-016). In addition, Natural England has also confirmed that they are "*satisfied with the proposed alternative mitigation scenarios presented*" in the oEMP (C1-029.8) i.e., Scenarios 2 and 3 (C2-025), and that "*these are sufficient to rule out Adverse Effect on Integrity (AEoI) for the Ribble and Alt Estuaries SPA/Ramsar*", highlighting their preference for Scenario 3 to be considered as a primary mitigation option (C1-016).
- 1.2.1.7 In addition, Natural England confirmed in its response to the letter published by the Secretary of State on 20 May 2026 (C2-025), that in light of the Applicants draft responses to Points 10 – 13 (and subject to the final responses being materially the same), "*it is likely that Natural England would be able to conclude that the loss of FLL would not result in an AEoI*" of the Ribble and Alt Estuaries SPA and Ramsar site without the need for permanent mitigation proposed at land south of Newton-with-Scales and taken into consideration in the Applicants Stage 2 ISAA Part 3 (REP6-024). In a meeting on 15 July 2026, Natural England indicated to the Applicants that its final position is that AEoI can be ruled out and that it would confirm this in writing in response to the SoS's letter (CS-001).
- 1.2.1.8 In response to the Secretary of State's request outlined in Points 10 and 11 above and Natural England's final position confirming no AEoI with respect to the Ribble and Alt Estuaries SPA and Ramsar site, the Applicants have, without prejudice to their position, updated the oEMP

(Without Prejudice Removal of Lytham Moss – Outline Ecological Management Plan (S_SoSQ_55)), Commitments Register (Without Prejudice Removal of Lytham Moss - Commitments Register (S_SoSQ_54)) and all other documents relevant to temporary onshore ornithology mitigation to remove the scenarios relying on Lytham Moss and land south of Newton-with-Scales (Scenarios 1 and 2) as well as reliance on land south of Newton-with-Scales as permanent mitigation for HRA purposes (noting this mitigation is still required in respect of the Environmental Impact Assessment). Scenario 3, utilising seasonal working and screening, is retained and secured as the mitigation for temporary ornithological impacts.

- 1.2.1.9 Consequently, Lytham Moss has been removed from the DCO Limits ('the Order Limits') by the Applicants on a without prejudice basis (see the Without Prejudice Removal of Lytham Moss – Onshore and Intertidal Order Limits Plan (S_SoSQ_38)).
- 1.2.1.10 Two project commitments (CoT107 and CoT120) underpin the temporary mitigation Scenarios 1 and 2, as well as the permanent mitigation area on land south of Newton-with-Scales. These have been updated in the Without Prejudice Removal of Lytham Moss - Commitments Register (S_SoSQ_54) to take into account the points outlined above. The original and revised wording of these commitments is shown in **Table 1** below. Black text denotes retained text, red denotes new text, and blue denotes removed text. In agreement with Natural England, these mitigations are no longer relied upon to conclude no AEol from the project alone and in-combination with other plans and projects for all European sites.

Table 1: Original and revised wording of commitments CoT107 and CoT120 as outlined in the Commitments Register

Commitment reference	Original commitment wording (C2-029.14)	Revised commitment wording (S_SoSQ_54)
CoT107	Where construction activities are undertaken along the onshore export cable corridor within areas of Functionally Linked Land (Lytham Moss Biological Heritage Site) in proximity to Higher Ballam and Lower Ballam, a mitigation area will be provided for supplementary feeding of pink-footed goose and whooper swan during the core wintering bird period (November to March, inclusive). The feeding may comprise retention of spoiled crop and/or the import of additional feed, as appropriate. In addition, scrapes will be provided for terrestrial wader features. This is detailed within the Outline Ecological Management Plan.	Where construction activities are undertaken along the onshore export cable corridor within areas of Functionally Linked Land (Lytham Moss Biological Heritage Site) in proximity to Higher Ballam and Lower Ballam, seasonal working practices and screening will be implemented from October to March (inclusive) to avoid disturbance to pink-footed goose and whooper swan. The indicative location of the seasonal working and screening is identified in the Outline Ecological Management Plan. a mitigation area will be provided for supplementary feeding of pink-footed goose and whooper swan during the core wintering bird period (November to March, inclusive). The feeding may comprise retention of spoiled crop and/or the import of additional feed, as appropriate. In addition, scrapes will be provided for terrestrial wader features. This is detailed within the Outline Ecological Management Plan.
CoT120	To mitigate for potential permanent habitat loss associated with each of the Onshore Substations, mitigation areas south of Newton-with-Scales will be provided for waders and farmland birds. Measures within these areas may include measures, such as, the creation of scrapes and thickening of hedgerows. This is detailed within the Outline Ecological Management Plan. The final measures will be developed and agreed with the relevant stakeholders as a part of the detailed Ecological Management Plan(s) prior to construction.	To mitigate for potential permanent habitat loss associated with each of the Onshore Substations (EIA effects only) , mitigation areas south of Newton-with-Scales will be provided for non-breeding waders. Measures within these areas to maintain existing habitats may include grassland and rush management. This is detailed within the Outline Ecological Management Plan. The final measures will be developed and agreed with the relevant stakeholders as a part of the detailed Ecological Management Plan(s) prior to construction.

1.3 Approach to the ISAA Addendum

- 1.3.1.1 The HRA Stage 2 ISAA (REP6-022, APP-016, REP6-024) builds upon the Transmission Assets: HRA Stage 1 Screening Report (hereafter referred to as 'HRA Stage 1 Screening Report') (REP6-026) and considers whether the Transmission Assets could have an adverse effect, either alone or in-combination with other plans or projects, on the integrity of any European site. These documents provide the Competent Authority with the information required to undertake an HRA Stage 2 Appropriate Assessment.
- 1.3.1.2 The scope of HRA Stage 2 covers all relevant European sites and designated features where Likely Significant Effects (LSEs) have been

identified in the HRA Stage 1 Screening Report (REP6-026), due to the potential impacts arising from the Transmission Assets. Designated features include Annex I habitats (offshore and coastal), Annex II diadromous fish species, Annex II marine mammals and ornithological features. For the purposes of this HRA Stage 2 ISAA, ornithological features have been split into two subsections – offshore ornithology, and onshore and intertidal ornithology based on the location of the impact. The offshore ornithology section identifies ornithological features which have the potential to interact with the Transmission Assets Order Limits: Offshore (hereafter referred to as ‘Offshore Order Limits’). The onshore and intertidal ornithology section identifies ornithological features which have the potential to interact with the Transmission Assets Order Limits: Onshore (hereafter referred to as ‘Onshore Order Limits’) and the Intertidal Infrastructure Area.

- 1.3.1.3 The without prejudice changes requested by the Secretary of State affect the Onshore Order Limits and the onshore and intertidal ornithology assessment only. The removal of the Lytham Moss mitigation area (CoT107) results in a reduction to the Onshore Order Limits. The land south of Newton-with-Scales (CoT120) is retained within the Order Limits, as it continues to be required to mitigate permanent EIA effects; only the reliance on it for temporary disturbance and temporary habitat loss mitigation (Scenario 1) is removed, which does not reduce the Order Limits in its own right. On this basis, the Applicants have not considered Annex I habitats (offshore and coastal), Annex II diadromous fish species, Annex II marine mammals and offshore ornithological features. Therefore, this addendum relates to onshore and intertidal ornithology and specifically to measures adopted as part of the Project that are relevant to the assessment of adverse effects on SPA and Ramsar sites designated for onshore and intertidal ornithology from disturbance and displacement from construction, decommissioning, and operation and maintenance activities (HRA Stage 2 ISAA Part 3, REP6-024).
- 1.3.1.4 The HRA Stage 2 ISAA (REP6-024) concluded no AEol for the relevant SPA and Ramsar sites on the basis of the mitigation then committed to (CoT107 and CoT120). The effect of this addendum is to transfer reliance for temporary disturbance, displacement and temporary habitat loss effects from the physical mitigation areas (Scenarios 1 and 2) to the retained Scenario 3 (seasonal working and screening), incorporating information previously submitted in Appendix F of the oEMP (C2-029.16). As outlined in **Section 1.2**, Natural England has confirmed these measures are sufficient to rule out AEol.
- 1.3.1.5 For the permanent loss of supporting habitat, the HRA Stage 2 ISAA (REP6-024) initially identified mitigation as being required for several non-breeding waterbirds, including wigeon, teal, golden plover and black-tailed godwit. The conclusions of no adverse effect for these features were therefore expressed as relying, in part, on the permanent mitigation at land south of Newton-with-Scales (CoT120). Following the provision of further information (C2-029.16 and C2-029.2) and consultation, Natural England has confirmed that AEol from the permanent loss of FLL for golden plover, and for the other relevant features of the Ribble and Alt Estuaries SPA, can be ruled out without

mitigation – reflecting the very small proportion of the foraging range affected (for golden plover, 0.04%) and the limited numbers of birds involved. On that basis, the permanent mitigation area on the land south of Newton-with-Scales is no longer required for the purposes of this HRA, and reliance upon it is removed.

- 1.3.1.6 The amendments outlined in **Section 1.4** are therefore confined to transferring reliance for temporary effects to Scenario 3, and to removing reliance on the permanent Newton-with-Scales mitigation consistent with Natural England's position. No re-screening of Likely Significant Effects and no change to the assessed impact magnitudes are required.
- 1.3.1.7 The maximum design parameters for the Transmission Assets 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).
- 1.3.1.8 If the without prejudice Order Limits are approved, it should be considered that any ISAA 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).

1.4 Without Prejudice Updates

- 1.4.1.1 The specific amendments to the HRA Stage 2 ISAA Part 3 (REP6-024) are set out in Table 2 below. In each case, the current wording is reproduced alongside the proposed without prejudice amendment.

Table 2: Without prejudice updates to REP6-024

ISAA Reference	Current wording (REP-024)	Proposed without prejudice amendment	Rationale
Table 1.71: Measures adopted as part of the project which are relevant to the assessment of adverse effect on SPA and Ramsar sites designated for onshore and intertidal ornithology from permanent loss of supporting habitats	Sets out the permanent mitigation area south of Newton-with-Scales (CoT120) for waders and farmland birds, including creation of scrapes and blocking of ditches.	Row deleted.	Mitigation is no longer relied upon. The permanent mitigation area south of Newton-with-Scales (CoT120) is not required for the HRA, as AEol is ruled out for all qualifying features and sites without mitigation (as agreed with Natural England).
Paragraph 1.6.3.18 (golden plover – permanent habitat loss, Ribble and Alt Estuaries SPA)	States: “...it is concluded that the permanent loss of habitats would have a negligible impact on golden plover within the Ribble and Alt Estuaries SPA. In addition, the Applicant’s commitment to improving habitat in nearby areas for waders such as such as golden plover (Table 1.72) and the creation of this suitable habitat nearby at land to the south of Newton with Scales would benefit golden plover in the long term.	“...it is concluded that the permanent loss of habitats would have a negligible impact on golden plover within the Ribble and Alt Estuaries SPA.”	Mitigation is no longer relied upon. The permanent mitigation area south of Newton-with-Scales (CoT120) is not required for the HRA, as AEol is ruled out for all qualifying features and sites without mitigation (as agreed with Natural England).
Table 1.72: Conclusions against the conservation objectives for the Ribble and Alt Estuaries SPA for permanent loss of supporting habitats	Cross-referred in paragraph 1.6.3.18 and states: “As the project has committed to creating and/or restoring nearby habitat that is suitable for golden plover, and the impacts will only affect 0.04% of the habitats available to 2.89% of the citation count of golden plover, there will be negligible impact on the extent and distribution, structure and function, or the supporting processes upon the habitats on which the qualifying features rely.”	“As the impacts will only affect 0.04% of the habitats available to 2.89% of the citation count of golden plover, there will be negligible impact on the extent and distribution, structure and function, or the supporting processes upon the habitats on which the qualifying features rely.”	Mitigation is no longer relied upon. The permanent mitigation area south of Newton-with-Scales (CoT120) is not required for the HRA, as AEol is ruled out for all qualifying features and sites without mitigation (as agreed with Natural England).

ISAA Reference	Current wording (REP-024)	Proposed without prejudice amendment	Rationale
Table 1.78: Measures adopted as part of the project which are relevant to the assessment of adverse effect on SPA and Ramsar sites designated for onshore and intertidal ornithology from temporarily habitat loss/disturbance and change in resource availability And Table 1.94: Measures adopted as part of the project which are relevant to the assessment of adverse effect on SPA and Ramsar sites designated for onshore and intertidal ornithology from disturbance and displacement from construction, decommissioning, and operation and maintenance activities.	CoT107 (Measure adopted): <i>“Where construction activities are undertaken along the onshore export cable corridor within areas of Functionally Linked Land (Lytham Moss Biological Heritage Site) in proximity to Higher Ballam and Lower Ballam, a mitigation area will be provided for supplementary feeding of pink-footed goose and whooper swan during the core wintering bird period (November to March, inclusive). The feeding may comprise retention of spoiled crop and/or the import of additional feed, as appropriate. In addition, scrapes will be provided for terrestrial wader features. This is detailed within the Outline Ecological Management Plan.”</i> CoT107 (Further information): <i>“A patch of arable farmland contained within Lytham Moss and adjacent to the Farmland Conservation Area has been identified as the location for mitigation.</i> <i>A patch of arable farmland contained within Lytham Moss and adjacent to the Farmland Conservation Area has been identified as the location for mitigation.</i> <i>Supplementary feeding for these species has been successfully implemented within the area. The measures aim to provide similar habitats to those that will be</i>	CoT107: <i>“Where construction activities are undertaken along the onshore export cable corridor within areas of Functionally Linked Land (Lytham Moss Biological Heritage Site) in proximity to Higher Ballam and Lower Ballam, seasonal working practices and screening will be implemented from October to March (inclusive) to avoid disturbance to pink-footed goose and whooper swan. The indicative location of the seasonal working and screening is identified in the Outline Ecological Management Plan.</i> <i>“The avoidance of impacts through seasonal working practices and screening within areas of FLL during the most sensitive period (i.e. October to March, inclusive) satisfies the first principle of the mitigation hierarchy.”</i>	CoT107 amended. Temporary disturbance, displacement, and habitat loss effects will be mitigated through the implementation of Scenario 3 (seasonal working and screening measures), as secured through the Without Prejudice Removal of Lytham Moss - oEMP (S_SoSQ_55), Requirement 12 of the Without Prejudice Removal of Lytham Moss and Morgan Land Powers - draft DCO (S_SoSQ_34), and the Without Prejudice Removal of Lytham Moss - Commitments Register (S_SoSQ_54).

ISAA Reference	Current wording (REP-024)	Proposed without prejudice amendment	Rationale
	<i>temporarily lost and move sensitive species to an area that avoids disturbance for the duration of works.</i> <i>The scrapes will provide better quality habitat than that to be temporarily lost for loafing geese, ducks, and swans, and foraging, loafing or roosting waders."</i>		
	Sets out the permanent mitigation area south of Newton-with-Scales (CoT120) for waders and farmland birds, including creation of scrapes and blocking of ditches.	Row deleted.	Mitigation is no longer relied upon. The permanent mitigation area south of Newton-with-Scales (CoT120) is not required for the HRA, as AEol is ruled out for all qualifying features and sites without mitigation (as agreed with Natural England).
Table 1.84: Conclusions against the conservation objectives of the Ribble and Alt Estuaries SPA for temporary loss of supporting habitats and/or resource availability for the assemblage features	Conclusion states: <i>"Due to winter working practices and mitigation areas there are not predicted to be any impacts at population level, or that impact the distribution of features. Therefore, there are not predicted to be any additional impacts upon the population and distribution of the assemblage features."</i>	<i>"Due to winter working practices and/or screening (CoT107) there are not predicted to be any impacts at population level, or that impact the distribution of features. Therefore, there are not predicted to be any additional impacts upon the population and distribution of the assemblage features."</i>	CoT107 amended. Temporary disturbance, displacement, and habitat loss effects will be mitigated through the implementation of Scenario 3 (seasonal working and screening measures), as secured through the Without Prejudice Removal of Lytham Moss - oEMP (S_SoSQ_55), Requirement 12 of the Without Prejudice Removal of Lytham Moss and Morgan Land Powers - draft DCO (S_SoSQ_34), and the Without Prejudice Removal of Lytham Moss - Commitments Register (S_SoSQ_54).
Paragraph 1.6.3.116 (pink-footed goose – temporary habitat loss, Ribble and Alt Estuaries SPA)	States: <i>"As FLL is to be lost at Lytham Moss, and as it is recognised that high numbers of pink-footed goose use this land, the Applicants have committed to supplementary feeding of geese and</i>	<i>"Due to the commitment to seasonal working practices and screening within areas of FLL during the period of October to March (inclusive), any effects of</i>	CoT107 amended. Temporary disturbance, displacement, and habitat loss effects will be mitigated through the implementation of Scenario 3 (seasonal working and screening

ISAA Reference	Current wording (REP-024)	Proposed without prejudice amendment	Rationale
	<i>swans on arable fields within the FLL (CoT107; Table 1.78). This measure will continue for as long as the construction takes place and will aim to offset the calorific losses from temporary habitat loss. It is therefore concluded that the works would have negligible impact on pink-footed goose within the Ribble and Alt Estuaries SPA."</i>	<i>disturbance/displacement/habitat loss will be avoided on FLL during the overwintering period. Therefore, it is concluded that there will be no impacts for this feature."</i>	measures), as secured through the Without Prejudice Removal of Lytham Moss - oEMP (S_SoSQ_55), Requirement 12 of the Without Prejudice Removal of Lytham Moss and Morgan Land Powers - draft DCO (S_SoSQ_34), and the Without Prejudice Removal of Lytham Moss - Commitments Register (S_SoSQ_54).
Paragraph 1.6.3.119 (whooper swan – temporary habitat loss, Ribble and Alt Estuaries SPA)	States: <i>"As FLL is to be lost at Lytham Moss, and as it is recognised that high numbers of whooper swan use this land, the Applicants have committed to supplementary feeding of geese and swans on arable fields within the FLL (CoT107; Table 1.78). This measure will continue for as long as the construction takes place and will aim to offset the calorific losses from temporary habitat loss. It is therefore concluded that the works would have negligible impact on whopper swan within the Ribble and Alt Estuaries SPA."</i>	<i>"Due to the commitment to seasonal working practices and screening within areas of FLL during the period of October to March (inclusive), any effects of disturbance/displacement/habitat loss will be avoided on FLL during the overwintering period. Therefore, it is concluded that there will be no impacts for this feature."</i>	CoT107 amended. Temporary disturbance, displacement, and habitat loss effects will be mitigated through the implementation of Scenario 3 (seasonal working and screening measures), as secured through the Without Prejudice Removal of Lytham Moss - oEMP (S_SoSQ_55), Requirement 12 of the Without Prejudice Removal of Lytham Moss and Morgan Land Powers - draft DCO (S_SoSQ_34), and the Without Prejudice Removal of Lytham Moss - Commitments Register (S_SoSQ_54).
Paragraph 1.6.3.125 to 1.6.3.126 (wigeon – permanent habitat loss, Ribble and Alt Estuaries SPA)	States: <i>"One of the key conservation requirements for this species is to maintain open, mixed pastoral/arable landscape close to roost areas' (Stroud et al., 2016), and there is a commitment by the Applicants to permanently enlarge and improve the area south of Newton with Scales for wintering wildfowl and waders</i>	<i>"FLL does not exist for wigeon within the Onshore Infrastructure Area (see Onshore Terrestrial Waterbird Note; REP4-120). Therefore, it is concluded that there will be no impacts for this feature."</i>	Updated to reflect that (as agreed with Natural England in REP5-183) there is no FLL for wigeon within the corridor.

ISAA Reference	Current wording (REP-024)	Proposed without prejudice amendment	Rationale
	<i>(CoT120) including measures such as the creation of scrapes and the blocking of ditches to flood the fields (Table 1.71).</i> <i>Therefore, as those resources that are to be temporarily lost will be enlarged and improved in the long term, it is concluded that the works would have negligible impact on wigeon within the Ribble and Alt Estuaries SPA."</i>		
Paragraph 1.6.3.129 (golden plover - temporary loss of supporting habitats and/or resource availability, Ribble and Alt Estuaries SPA)	<i>States: "Over-wintered stubbles, autumn-sown cereal, waste root crops, and especially flooded fields are of importance to this species (Stroud et al., 2016). There is a commitment by the Applicants to enlarge and improve the area south of Newton with Scales for wintering wildfowl and waders including measures such as scrapes and the blocking of ditches to flood the fields. Therefore, as those resources that are to be temporarily lost will be enlarged and improved in the long term, it is concluded that the works would have negligible impact on teal within the Ribble and Alt Estuaries SPA."</i>	<i>"Due to the commitment to seasonal working practices and screening within areas of FLL during the period of October to March (inclusive), any effects of disturbance/displacement/habitat loss will be avoided on FLL during the overwintering period. Therefore, it is concluded that there will be no impacts for this feature."</i>	CoT107 amended. Temporary disturbance, displacement, and habitat loss effects will be mitigated through the implementation of Scenario 3 (seasonal working and screening measures), as secured through the Without Prejudice Removal of Lytham Moss - oEMP (S_SoSQ_55), Requirement 12 of the Without Prejudice Removal of Lytham Moss and Morgan Land Powers - draft DCO (S_SoSQ_34), and the Without Prejudice Removal of Lytham Moss - Commitments Register (S_SoSQ_54).
Paragraph 1.6.3.149 (terrestrial features – permanent habitat loss, Ribble and Alt Estuaries SPA)	<i>States: "As the Applicants have committed to creating permanent habitat that will benefit shoveler, curlew and black-tailed godwit to the south of Newton with Scales, and as these species have already been recorded as using this area it is</i>	<i>"It is concluded that there will be negligible impacts for these features within the Ribble and Alt Estuaries Ramsar site. As the Applicants have committed to creating permanent habitat to mitigate EIA effects to the south of Newton with Scales, and</i>	Mitigation is no longer relied upon. The permanent mitigation area south of Newton-with-Scales (CoT120) is not required for the HRA, as AEol is ruled out for all qualifying features and sites without mitigation (as agreed with Natural England).

ISAA Reference	Current wording (REP-024)	Proposed without prejudice amendment	Rationale
	<i>therefore likely that they will use the mitigation area. Therefore, it is concluded that there will be negligible impacts for these features within the Ribble and Alt Estuaries Ramsar site."</i>	<i>shoveler, curlew and black-tailed godwit have already been recorded as using this area, it is therefore likely that they will use and benefit from the mitigation area."</i>	
Paragraph 1.6.3.156 (pink-footed goose - temporary loss of supporting habitats and/or resource availability, Martin Mere SPA)	States: <i>"The Applicants have committed to supplementary feeding of geese and swans on arable fields within the FLL (CoT107; Table 1.78). This measure will continue for as long as construction takes place and will aim to offset the calorific losses from temporary habitat loss. Therefore, as those resources that are to be temporarily lost will be compensated, it is concluded that the works would have negligible impact on pink-footed goose within the Martin Mere SPA."</i>	<i>"Due to the commitment to seasonal working practices and screening within areas of FLL during the period of October to March (Inclusive), any effects of disturbance/displacement/habitat loss will be avoided on FLL during the overwintering period. Therefore, it is concluded that there will be no impacts for this feature."</i>	CoT107 amended. Temporary disturbance, displacement, and habitat loss effects will be mitigated through the implementation of Scenario 3 (seasonal working and screening measures), as secured through the Without Prejudice Removal of Lytham Moss - oEMP (S_SoSQ_55), Requirement 12 of the Without Prejudice Removal of Lytham Moss and Morgan Land Powers - draft DCO (S_SoSQ_34), and the Without Prejudice Removal of Lytham Moss - Commitments Register (S_SoSQ_54).
Table 1.87: Conclusions against the conservation objectives of the Martin Mere SPA for temporary loss of supporting habitats and/or resource availability	States: <i>"As temporary food provision will be provided, the temporary loss of 0.26% of habitats is not predicted to impact upon the population or distribution of the qualifying features."</i>	<i>"Due to the commitment to seasonal working practices and screening within areas of FLL during the period of October to March (inclusive), any effects of disturbance/displacement/habitat loss will be avoided on FLL during the overwintering period. Therefore, it is concluded that there will be no impacts for this site."</i>	CoT107 amended. Temporary disturbance, displacement, and habitat loss effects will be mitigated through the implementation of Scenario 3 (seasonal working and screening measures), as secured through the Without Prejudice Removal of Lytham Moss - oEMP (S_SoSQ_55), Requirement 12 of the Without Prejudice Removal of Lytham Moss and Morgan Land Powers - draft DCO (S_SoSQ_34), and the Without Prejudice Removal of Lytham Moss - Commitments Register (S_SoSQ_54).

ISAA Reference	Current wording (REP-024)	Proposed without prejudice amendment	Rationale
Paragraph 1.6.3.165 (pink-footed goose – temporary habitat loss, Morecambe Bay and Duddon Estuary SPA)	States: <i>“The Applicants have committed to supplementary feeding of geese and swans on arable fields within the FLL (CoT107; Table 1.78). This measure will continue for as long as the construction takes place and will aim to offset the calorific losses from temporary habitat loss. Therefore, as those resources that are to be temporarily lost will be compensated, it is concluded that the works would have negligible impact on pink-footed goose within the Morecambe Bay and Duddon Estuary SPA.”</i>	<i>“Due to the commitment to seasonal working practices and screening within areas of FLL during the period of October to March (inclusive), any effects of disturbance/displacement/habitat loss will be avoided on FLL during the overwintering period. Therefore, it is concluded that there will be no impacts for this feature.”</i>	CoT107 amended. Temporary disturbance, displacement, and habitat loss effects will be mitigated through the implementation of Scenario 3 (seasonal working and screening measures), as secured through the Without Prejudice Removal of Lytham Moss - oEMP (S_SoSQ_55), Requirement 12 of the Without Prejudice Removal of Lytham Moss and Morgan Land Powers - draft DCO (S_SoSQ_34), and the Without Prejudice Removal of Lytham Moss - Commitments Register (S_SoSQ_54).
Commitment Table 1.89: Conclusions against the conservation objectives for Morecambe Bay and Duddon Estuary SPA for temporary loss of supporting habitats and/or resource availability	States: <i>“It is concluded that there will be negligible impact on the extent and distribution, structure and function, and the supporting process upon which features rely. This is due to the distance from the SPA, the very low proportions of available foraging ranges that are to be temporarily lost, and owing to the commitment the Applicants have made to support the calorific needs of pink-footed goose by creating habitat suitable for waders.”</i> <i>“As temporary food provision and habitat will be provided for wintering features, the temporary loss of habitats is predicted to have a negligible impact upon the population</i>	<i>“Due to the commitment to seasonal working practices and screening within areas of FLL during the period of October to March (inclusive), any effects of disturbance/displacement/habitat loss will be avoided on FLL during the overwintering period. Therefore, it is concluded that there will be no impacts for this feature.”</i>	CoT107 amended. Temporary disturbance, displacement, and habitat loss effects will be mitigated through the implementation of Scenario 3 (seasonal working and screening measures), as secured through the Without Prejudice Removal of Lytham Moss - oEMP (S_SoSQ_55), Requirement 12 of the Without Prejudice Removal of Lytham Moss and Morgan Land Powers - draft DCO (S_SoSQ_34), and the Without Prejudice Removal of Lytham Moss - Commitments Register (S_SoSQ_54).

ISAA Reference	Current wording (REP-024)	Proposed without prejudice amendment	Rationale
	<i>or distribution of the qualifying features.”</i>		
Table 1.91: Conclusions against the conservation objectives of the Bowland Fells SPA for temporary loss of supporting habitats and/or resource availability.	<i>States “It is concluded that there will be negligible impact on the extent and distribution, structure and function, and the supporting process upon which features rely. This is due to the distance from the SPA, the very low proportions of available foraging ranges that are to be temporarily lost, and owing to the commitment the Applicants have made to support the calorific needs of pink-footed goose by creating habitat suitable for waders.”</i>	<i>“It is concluded that there will be negligible impact on the extent and distribution, structure and function, and the supporting process upon which features rely. This is due to the distance from the SPA, and the very low proportions of available foraging ranges that are to be temporarily lost.”</i>	This is an errata.
Paragraph 1.6.3.263 (terrestrial features)	<i>States: “The Applicants have committed to an alternative site for the supplementary feeding of pink-footed goose during the core wintering period. Additional measures to take place within the arable land at Lytham Moss include the creation of scrape to mitigate for impacts upon waders and wildfowl features.”</i>	<i>“Due to the commitment to seasonal working practices and screening within areas of FLL during the period of October to March (inclusive), any effects of disturbance/displacement/habitat loss will be avoided on FLL during the overwintering period. Therefore, it is concluded that there will be no impacts.”</i>	CoT107 amended. Temporary disturbance, displacement, and habitat loss effects will be mitigated through the implementation of Scenario 3 (seasonal working and screening measures), as secured through the Without Prejudice Removal of Lytham Moss - oEMP (S_SoSQ_55), Requirement 12 of the Without Prejudice Removal of Lytham Moss and Morgan Land Powers - draft DCO (S_SoSQ_34), and the Without Prejudice Removal of Lytham Moss - Commitments Register (S_SoSQ_54).
Paragraph 1.6.3.267 (pink-footed goose – temporary disturbance and displacement, Ribble and Alt Estuaries SPA)	<i>States: “The Applicants have committed to supplementary feeding of geese and swans on arable fields within the FLL (CoT107; Table 1.78). This measure will continue for as long as the construction takes place and</i>	<i>“Due to the commitment to seasonal working practices and screening within areas of FLL during the period of October to March (inclusive), any effects of disturbance/displacement/habitat loss</i>	CoT107 amended. Temporary disturbance, displacement, and habitat loss effects will be mitigated through the implementation of Scenario 3 (seasonal working and screening measures), as secured through the

ISAA Reference	Current wording (REP-024)	Proposed without prejudice amendment	Rationale
	<i>will aim to offset the potential calorific losses from disturbance/displacement. Therefore, it is concluded that temporary displacement caused by construction of Transmission Assets would have negligible impact on pink-footed goose within the Ribble and Alt Estuaries SPA.</i>	<i>will be avoided on FLL during the overwintering period. Therefore, it is concluded that there will be no impacts for this feature."</i>	Without Prejudice Removal of Lytham Moss - oEMP (S_SoSQ_55), Requirement 12 of the Without Prejudice Removal of Lytham Moss and Morgan Land Powers - draft DCO (S_SoSQ_34), and the Without Prejudice Removal of Lytham Moss - Commitments Register (S_SoSQ_54).
Paragraph 1.6.3.269 (whooper swan - temporary disturbance and displacement, Ribble and Alt Estuaries SPA)	States: <i>"The Applicants have committed to supplementary feeding of geese and swans on arable fields within the FLL (CoT107; Table 1.78). This measure will continue for as long as the construction takes place and will aim to offset the potential calorific losses from disturbance/displacement. It is therefore concluded that temporary displacement caused by construction of Transmission Assets would have negligible impact on whooper swan within the Ribble and Alt Estuaries SPA."</i>	<i>"Due to the commitment to seasonal working practices and screening within areas of FLL during the period of October to March (inclusive), any effects of disturbance/displacement/habitat loss will be avoided on FLL during the overwintering period. Therefore, it is concluded that there will be no impacts for this feature."</i>	CoT107 amended. Temporary disturbance, displacement, and habitat loss effects will be mitigated through the implementation of Scenario 3 (seasonal working and screening measures), as secured through the Without Prejudice Removal of Lytham Moss - oEMP (S_SoSQ_55), Requirement 12 of the Without Prejudice Removal of Lytham Moss and Morgan Land Powers - draft DCO (S_SoSQ_34), and the Without Prejudice Removal of Lytham Moss - Commitments Register (S_SoSQ_54).
Paragraph 1.6.3.272 (wigeon – temporary disturbance and displacement, Ribble and Alt Estuaries SPA)	States: <i>"As land to the south of Newton with Scales is to be permanently improved for wintering waders and wildfowl with the creation of scrapes and the blocking of ditches to rewet grassland, it is concluded that temporary displacement caused by construction of Transmission Assets would have negligible impact on wigeon within the Ribble and Alt Estuaries SPA."</i>	<i>"Due to the commitment to seasonal working practices and screening within areas of FLL during the period of October to March (inclusive), any effects of disturbance/displacement/habitat loss will be avoided on FLL during the overwintering period. Therefore, it is concluded that there will be no impacts for this feature."</i>	CoT107 amended. Temporary disturbance, displacement, and habitat loss effects will be mitigated through the implementation of Scenario 3 (seasonal working and screening measures), as secured through the Without Prejudice Removal of Lytham Moss - oEMP (S_SoSQ_55), Requirement 12 of the Without Prejudice Removal of Lytham Moss and Morgan Land Powers - draft DCO (S_SoSQ_34), and the Without

ISAA Reference	Current wording (REP-024)	Proposed without prejudice amendment	Rationale
			Prejudice Removal of Lytham Moss - Commitments Register (S_SoSQ_54).
Paragraph 1.6.3.274 (teal – temporary disturbance and displacement, Ribble and Alt Estuaries SPA)	States: “ <i>As land to the south of Newton with Scales is to be permanently improved for wintering waders and wildfowl with the creation of scrapes and the blocking of ditches to rewet grassland, it is concluded that temporary displacement caused by construction of Transmission Assets would have negligible impact on teal within the Ribble and Alt Estuaries SPA.</i> ”	“ <i>Due to the commitment to seasonal working practices and screening within areas of FLL during the period of October to March (inclusive), any effects of disturbance/displacement/habitat loss will be avoided on FLL during the overwintering period. Therefore, it is concluded that there will be no impacts for this feature.</i> ”	CoT107 amended. Temporary disturbance, displacement, and habitat loss effects will be mitigated through the implementation of Scenario 3 (seasonal working and screening measures), as secured through the Without Prejudice Removal of Lytham Moss - oEMP (S_SoSQ_55), Requirement 12 of the Without Prejudice Removal of Lytham Moss and Morgan Land Powers - draft DCO (S_SoSQ_34), and the Without Prejudice Removal of Lytham Moss - Commitments Register (S_SoSQ_54).
Paragraph 1.6.3.276 (golden plover – temporary disturbance and displacement, Ribble and Alt Estuaries SPA)	States: “ <i>As FLL is to be lost to displacement at Lytham Moss, the Applicants have committed to the creation of temporary scrapes and improving grassland for waders such as golden plover (CoT107; Table 1.78). This measure will continue for as long as the construction takes place. It is therefore concluded that temporary displacement caused by construction of Transmission Assets would have negligible impact on golden plover within the Ribble and Alt Estuaries SPA.</i> ”	“ <i>Due to the commitment to seasonal working practices and screening within areas of FLL during the period of October to March (inclusive), any effects of disturbance/displacement/habitat loss will be avoided on FLL during the overwintering period. Therefore, it is concluded that there will be no impacts for this feature.</i> ”	CoT107 amended. Temporary disturbance, displacement, and habitat loss effects will be mitigated through the implementation of Scenario 3 (seasonal working and screening measures), as secured through the Without Prejudice Removal of Lytham Moss - oEMP (S_SoSQ_55), Requirement 12 of the Without Prejudice Removal of Lytham Moss and Morgan Land Powers - draft DCO (S_SoSQ_34), and the Without Prejudice Removal of Lytham Moss - Commitments Register (S_SoSQ_54).
Paragraph 1.6.3.278 (black-tailed godwit – temporary disturbance and displacement, Ribble and Alt Estuaries SPA)	States: “ <i>The Applicants have committed to the creation of temporary scrapes and improving grassland for waders such as black-tailed godwit</i> ”	“ <i>Due to the commitment to seasonal working practices and screening within areas of FLL during the period of October to March (inclusive), any</i> ”	CoT107 amended. Temporary disturbance, displacement, and habitat loss effects will be mitigated through the implementation of Scenario 3

ISAA Reference	Current wording (REP-024)	Proposed without prejudice amendment	Rationale
	<i>(CoT107; Table 1.78). This measure will continue for as long as the construction takes place. It is therefore concluded that temporary displacement caused by construction of Transmission Assets would have negligible impact on black-tailed godwit within the Ribble and Alt Estuaries SPA.</i>	<i>effects of disturbance/displacement/habitat loss will be avoided on FLL during the overwintering period. Therefore, it is concluded that there will be no impacts for this feature."</i>	(seasonal working and screening measures), as secured through the Without Prejudice Removal of Lytham Moss - oEMP (S_SoSQ_55), Requirement 12 of the Without Prejudice Removal of Lytham Moss and Morgan Land Powers - draft DCO (S_SoSQ_34), and the Without Prejudice Removal of Lytham Moss - Commitments Register (S_SoSQ_54).
Paragraph 1.6.3.280 – 1.6.3.282 (Conclusions – temporary disturbance and displacement, Ribble and Alt Estuaries SPA)	<i>States: "For the goose and swan features supplementary feeding will be provided to mitigate against the effects of displacement caused by disturbance from construction activities. The Applicants have committed to this measure for the duration of construction in areas where these features are present.</i> <i>For shelduck and the wader features, the Applicants have committed to the temporary creation of scrapes, etc, at the arable fields at Lytham Moss. The aim of this mitigation is to entice birds away from areas that will be subject to disturbance effects from construction activities.</i> <i>The wigeon and teal are unlikely to be SPA features and are more likely to belong to the Newton Marsh SSSI roost. Nonetheless, the Applicants have committed to permanent mitigation to improve land south of Newton with Scales for wintering</i>	<i>"Due to the commitment seasonal working practices and screening within areas of FLL during the period of October to March (inclusive), any effects of disturbance/displacement/habitat loss will be avoided on FLL during the overwintering period. Therefore, it is concluded that there will be no impacts for these features."</i>	CoT107 amended. Temporary disturbance, displacement, and habitat loss effects will be mitigated through the implementation of Scenario 3 (seasonal working and screening measures), as secured through the Without Prejudice Removal of Lytham Moss - oEMP (S_SoSQ_55), Requirement 12 of the Without Prejudice Removal of Lytham Moss and Morgan Land Powers - draft DCO (S_SoSQ_34), and the Without Prejudice Removal of Lytham Moss - Commitments Register (S_SoSQ_54).

ISAA Reference	Current wording (REP-024)	Proposed without prejudice amendment	Rationale
	<i>waders and wildfowl with possible measures including creation of scrapes, rewetting grassland, etc. As many of the wigeon and teal recorded during survey were in this area it is highly likely that they will colonise the mitigation area."</i>		
Table 198: Conclusions against the conservation objectives of the Ribble and Alt Estuaries SPA terrestrial features for disturbance and displacement from activities associated with construction, operation and maintenance and decommissioning	States: <i>"Due to the mitigation measures that are to be put in place (either seasonal working practices or temporary feeding and/or habitat creation/improvement), there are predicted negligible impacts on the population or distribution of each feature as a result of disturbance and displacement from construction, decommissioning, and operation and maintenance activities.</i>	<i>"Due to the implementation of seasonal working practices and screening (CoT107), there are predicted negligible impacts on the population or distribution of each feature as a result of disturbance and displacement from construction, decommissioning, and operation and maintenance activities.</i> <i>The Transmission Assets would not prevent the population size or distribution of the features from being maintained."</i>	CoT107 amended. Temporary disturbance, displacement, and habitat loss effects will be mitigated through the implementation of Scenario 3 (seasonal working and screening measures), as secured through the Without Prejudice Removal of Lytham Moss - oEMP (S_SoSQ_55), Requirement 12 of the Without Prejudice Removal of Lytham Moss and Morgan Land Powers - draft DCO (S_SoSQ_34), and the Without Prejudice Removal of Lytham Moss - Commitments Register (S_SoSQ_54).
Table 199: Conclusions against the conservation objectives of the Ribble and Alt Estuaries SPA for disturbance and displacement from construction and decommissioning activities	<i>The Transmission Assets would not prevent the population size or distribution of the features from being maintained."</i>		
Paragraph 1.6.3.293 (black-tailed godwit - temporary loss of supporting habitats and/or resource availability, Ribble and Alt Estuaries SPA)	States: <i>"As the Applicants have committed to creating permanent habitat that will benefit black-tailed godwit to the south of Newton with Scales, and as these species have already been recorded as using this area it is therefore likely that they will use the mitigation area. Therefore, it is concluded that there will be negligible</i>	<i>"Due to the commitment to seasonal working practices and screening within areas of FLL during the period of October to March (inclusive), any effects of disturbance/displacement/habitat loss will be avoided on FLL during the overwintering period. Therefore, it is concluded that there will be no impacts for this feature."</i>	CoT107 amended. Temporary disturbance, displacement, and habitat loss effects will be mitigated through the implementation of Scenario 3 (seasonal working and screening measures), as secured through the Without Prejudice Removal of Lytham Moss - oEMP (S_SoSQ_55), Requirement 12 of the Without Prejudice Removal of Lytham Moss

ISAA Reference	Current wording (REP-024)	Proposed without prejudice amendment	Rationale
	<i>impacts for these features within the Ribble and Alt Estuaries Ramsar site."</i>		and Morgan Land Powers - draft DCO (S_SoSQ_34), and the Without Prejudice Removal of Lytham Moss - Commitments Register (S_SoSQ_54).
Paragraph 1.6.3.296 (pink-footed goose – temporary displacement, Martin Mere SPA)	States: <i>"As FLL is to be lost to displacement at Lytham Moss, and as it is recognised that high numbers of pink-footed goose use this land, the Applicants have committed to supplementary feeding of geese and swans on arable fields within the FLL (CoT107; Table 1.78). This measure will continue for as long as the construction takes place and will aim to match the calorific losses created through displacement. Therefore, as those resources that are to be temporarily lost will be compensated, it is concluded that temporary displacement caused by construction of Transmission Assets would have negligible impact on pink footed goose within Martin Mere SPA."</i>	<i>"Due to the commitment to seasonal working practices and screening within areas of FLL during the period of October to March (inclusive), any effects of disturbance/displacement/habitat loss will be avoided on FLL during the overwintering period. Therefore, it is concluded that there will be no impacts for this feature."</i>	CoT107 amended. Temporary disturbance, displacement, and habitat loss effects will be mitigated through the implementation of Scenario 3 (seasonal working and screening measures), as secured through the Without Prejudice Removal of Lytham Moss - oEMP (S_SoSQ_55), Requirement 12 of the Without Prejudice Removal of Lytham Moss and Morgan Land Powers - draft DCO (S_SoSQ_34), and the Without Prejudice Removal of Lytham Moss - Commitments Register (S_SoSQ_54).
Paragraph 1.6.3.302 (pink-footed goose – temporary displacement, Morecambe Bay and Duddon Estuary SPA)	States: <i>The Applicants have committed to supplementary feeding of geese and swans on arable fields within the FLL (CoT107; Table 1.78). This measure will continue for as long as the construction takes place and will aim to offset the potential calorific losses from displacement. Therefore, it is concluded that temporary displacement caused by construction of Transmission Assets would</i>	<i>"Due to the commitment to seasonal working practices and screening within areas of FLL during the period of October to March (inclusive), any effects of disturbance/displacement/habitat loss will be avoided on FLL during the overwintering period. Therefore, it is concluded that there will be no impacts for this feature."</i>	CoT107 amended. Temporary disturbance, displacement, and habitat loss effects will be mitigated through the implementation of Scenario 3 (seasonal working and screening measures), as secured through the Without Prejudice Removal of Lytham Moss - oEMP (S_SoSQ_55), Requirement 12 of the Without Prejudice Removal of Lytham Moss and Morgan Land Powers - draft DCO (S_SoSQ_34), and the Without

ISAA Reference	Current wording (REP-024)	Proposed without prejudice amendment	Rationale
	<i>have negligible impact on pink-footed goose within the Morecambe Bay and Duddon Estuary SPA."</i>		Prejudice Removal of Lytham Moss - Commitments Register (S_SoSQ_54).
Paragraph 1.6.3.304 (golden plover – temporary displacement, Morecambe Bay and Duddon Estuary SPA)	States: <i>"The Applicants have committed to the creation of temporary scrapes and improving grassland for waders such as golden plover (CoT107; Table 1.78). This measure will continue for as long as the construction takes place. It is therefore concluded that temporary is placement caused by construction of Transmission Assets would have negligible impact on golden plover within the Morecambe Bay and Duddon Estuary SPA."</i>	<i>"Due to the commitment to seasonal working practices and screening within areas of FLL during the period of October to March (inclusive), any effects of disturbance/displacement/habitat loss will be avoided on FLL during the overwintering period. Therefore, it is concluded that there will be no impacts for this feature."</i>	CoT107 amended. Temporary disturbance, displacement, and habitat loss effects will be mitigated through the implementation of Scenario 3 (seasonal working and screening measures), as secured through the Without Prejudice Removal of Lytham Moss - oEMP (S_SoSQ_55), Requirement 12 of the Without Prejudice Removal of Lytham Moss and Morgan Land Powers - draft DCO (S_SoSQ_34), and the Without Prejudice Removal of Lytham Moss - Commitments Register (S_SoSQ_54).
Paragraph 1.6.3.306 (curlew - temporary displacement, Morecambe Bay and Duddon Estuary SPA)	States: <i>"As the majority of curlew were recorded in the fields at Lytham Moss (Appendix 4.2: Wintering and migratory birds of the ES) and temporary measures are to be put in place to improve habitat for waders, it is concluded that there will be negligible adverse effects on this feature in the Morecambe Bay and Duddon Estuary SPA."</i>	<i>"Due to the commitment to seasonal working practices and screening within areas of FLL during the period of October to March (inclusive), any effects of disturbance/displacement/habitat loss will be avoided on FLL during the overwintering period. Therefore, it is concluded that there will be no impacts for this feature."</i>	CoT107 amended. Temporary disturbance, displacement, and habitat loss effects will be mitigated through the implementation of Scenario 3 (seasonal working and screening measures), as secured through the Without Prejudice Removal of Lytham Moss - oEMP (S_SoSQ_55), Requirement 12 of the Without Prejudice Removal of Lytham Moss and Morgan Land Powers - draft DCO (S_SoSQ_34), and the Without Prejudice Removal of Lytham Moss - Commitments Register (S_SoSQ_54).
Table 1.100: Conclusions against the conservation objectives of the Martin Mere Estuaries SPA for disturbance	States: <i>"As temporary food provision will be provided, the temporary loss of up to 2.4% of habitats is predicted to</i>	<i>"Due to the commitment to seasonal working practices and screening within areas of FLL during the period of</i>	CoT107 amended. Temporary disturbance, displacement, and habitat loss effects will be mitigated through

ISAA Reference	Current wording (REP-024)	Proposed without prejudice amendment	Rationale
and displacement from activities associated with construction, operation and maintenance and decommissioning	<i>have a negligible impact upon the population or distribution of the qualifying features."</i>	<i>October to March (inclusive), any effects of disturbance/displacement/habitat loss will be avoided on FLL during the overwintering period. Therefore, it is concluded that there will be no impacts for this site."</i>	the implementation of Scenario 3 (seasonal working and screening measures), as secured through the Without Prejudice Removal of Lytham Moss - oEMP (S_SoSQ_55), Requirement 12 of the Without Prejudice Removal of Lytham Moss and Morgan Land Powers - draft DCO (S_SoSQ_34), and the Without Prejudice Removal of Lytham Moss - Commitments Register (S_SoSQ_54).
Paragraph 1.6.3.302 (pink-footed goose – temporary displacement, Morecambe Bay and Duddon Estuary SPA)	States: <i>"The Applicants have committed to supplementary feeding of geese and swans on arable fields within the FLL (CoT107; Table 1.78). This measure will continue for as long as the construction takes place and will aim to offset the potential calorific losses from displacement. Therefore, it is concluded that temporary displacement caused by construction of Transmission Assets would have negligible impact on pink-footed goose within the Morecambe Bay and Duddon Estuary SPA."</i>	<i>"Due to the commitment to seasonal working practices and screening within areas of FLL during the period of October to March (inclusive), any effects of disturbance/displacement/habitat loss will be avoided on FLL during the overwintering period. Therefore, it is concluded that there will be no impacts for this feature."</i>	CoT107 amended. Temporary disturbance, displacement, and habitat loss effects will be mitigated through the implementation of Scenario 3 (seasonal working and screening measures), as secured through the Without Prejudice Removal of Lytham Moss - oEMP (S_SoSQ_55), Requirement 12 of the Without Prejudice Removal of Lytham Moss and Morgan Land Powers - draft DCO (S_SoSQ_34), and the Without Prejudice Removal of Lytham Moss - Commitments Register (S_SoSQ_54).
Paragraph 1.6.3.304 (golden plover – temporary displacement, Morecambe Bay and Duddon Estuary SPA)	States: <i>"The Applicants have committed to the creation of temporary scrapes and improving grassland for waders such as golden plover (CoT107; Table 1.78). This measure will continue for as long as the construction takes place. It is therefore concluded that temporary displacement caused by construction of Transmission Assets would have</i>	<i>"Due to the commitment to seasonal working practices and screening within areas of FLL during the period of October to March (inclusive), any effects of disturbance/displacement/habitat loss will be avoided on FLL during the overwintering period. Therefore, it is</i>	CoT107 amended. Temporary disturbance, displacement, and habitat loss effects will be mitigated through the implementation of Scenario 3 (seasonal working and screening measures), as secured through the Without Prejudice Removal of Lytham Moss - oEMP (S_SoSQ_55), Requirement 12 of the Without Prejudice Removal of Lytham Moss

ISAA Reference	Current wording (REP-024)	Proposed without prejudice amendment	Rationale
	<i>negligible impact on golden plover within the Morecambe Bay and Duddon Estuary SPA."</i>	<i>concluded that there will be no impacts for this feature."</i>	and Morgan Land Powers - draft DCO (S_SoSQ_34), and the Without Prejudice Removal of Lytham Moss - Commitments Register (S_SoSQ_54).
Paragraph 1.6.3.306 (Curlew – temporary displacement, Morecambe Bay and Duddon Estuary SPA)	<i>States: "As the majority of curlew were recorded in the fields at Lytham Moss (Appendix 4.2: Wintering and migratory birds of the ES) and temporary measures are to be put in place to improve habitat for waders, it is concluded that there will be negligible adverse effects on this feature in the Morecambe Bay and Duddon Estuary SPA."</i>	<i>"Due to the commitment to seasonal working practices and screening within areas of FLL during the period of October to March (inclusive), any effects of disturbance/displacement/habitat loss will be avoided on FLL during the overwintering period. Therefore, it is concluded that there will be no impacts for this feature."</i>	CoT107 amended. Temporary disturbance, displacement, and habitat loss effects will be mitigated through the implementation of Scenario 3 (seasonal working and screening measures), as secured through the Without Prejudice Removal of Lytham Moss - oEMP (S_SoSQ_55), Requirement 12 of the Without Prejudice Removal of Lytham Moss and Morgan Land Powers - draft DCO (S_SoSQ_34), and the Without Prejudice Removal of Lytham Moss - Commitments Register (S_SoSQ_54).
Paragraph 1.6.2.34 (In-combination impact of temporary loss of supporting habitat and/or resource availability)	<i>States: "As noted in paragraph 1.6.3.56 up to 193,413 m2 (19.34 ha) of highly FLL (Bowland Ecology, 2021) will be temporarily lost during the construction phase of the Transmission Assets within the onshore export cable corridor. Considering this potential impact, the Applicants have committed to adopting an alternative site for supplementary feeding of pink-footed goose, located at a suitable distance from construction activities. This mitigation will begin prior to the commencement of construction works within the FLL. Additionally, measures will be put in</i>	<i>"Due to the commitment to seasonal working practices and screening within areas of FLL during the period of October to March (inclusive), any temporary effects of disturbance/displacement/habitat loss will be avoided on FLL during the overwintering period. Therefore, it is concluded that there will be no impacts."</i>	CoT107 amended. Temporary disturbance, displacement, and habitat loss effects will be mitigated through the implementation of Scenario 3 (seasonal working and screening measures), as secured through the Without Prejudice Removal of Lytham Moss - oEMP (S_SoSQ_55), Requirement 12 of the Without Prejudice Removal of Lytham Moss and Morgan Land Powers - draft DCO (S_SoSQ_34), and the Without Prejudice Removal of Lytham Moss - Commitments Register (S_SoSQ_54).

ISAA Reference	Current wording (REP-024)	Proposed without prejudice amendment	Rationale
	<i>place on land to the south of Newton with Scales that include the creation and maintenance of suitable foraging and roosting habitat for goose, duck, swan and wader species."</i>		
Table 1.111: Conclusions against the conservation objectives of the Ribble and Alt Estuaries SPA and Ramsar site for all in-combination impacts	<i>States: "All Tier 1 projects identified would not adversely impact the integrity of the Ribble and Alt estuaries SPA and Ramsar site through the impacts assessed. The assessment in-combination mirrors that of the alone and the mitigation provided by the projects avoids an adverse effect on the habitats the SPA feature populations rely on. As the Applicants have committed to supplementary feeding and creating nearby habitat that is suitable for SPA qualifying features there will be no adverse effects on the extent and distribution of the habitats of the qualifying features at potential risk from the impact of temporary habitat loss and disturbance and displacement.</i> <i>Therefore, in-combination impacts during the construction and operation and maintenance phase will not prevent the extent and distribution, structure and function or the supporting processes on which the habitats of the qualifying features rely from being maintained or restored."</i> And	<i>"All Tier 1 projects identified would not adversely impact the integrity of the Ribble and Alt Estuaries SPA and Ramsar site through the impacts assessed. The assessment in-combination mirrors that of the alone and the mitigation provided by the project avoids an adverse effect on the habitats the SPA feature populations rely on.</i> <i>Therefore, in-combination impacts during the construction and operation and maintenance phase will not prevent the extent and distribution, structure and function or the supporting processes on which the habitats of the qualifying features rely from being maintained or restored."</i> And <i>"All Tier 1 projects identified would not adversely impact the integrity of the Ribble and Alt Estuaries SPA and Ramsar site through the impacts assessed. The assessment in-combination mirrors that of the alone and the mitigation provided by the project avoids an adverse effect on the habitats the SPA feature populations rely on.</i>	CoT107 amended. Temporary disturbance, displacement, and habitat loss effects will be mitigated through the implementation of Scenario 3 (seasonal working and screening measures), as secured through the Without Prejudice Removal of Lytham Moss - oEMP (S_SoSQ_55), Requirement 12 of the Without Prejudice Removal of Lytham Moss and Morgan Land Powers - draft DCO (S_SoSQ_34), and the Without Prejudice Removal of Lytham Moss - Commitments Register (S_SoSQ_54).

ISAA Reference	Current wording (REP-024)	Proposed without prejudice amendment	Rationale
	<i>“All Tier 1 projects identified would not impact the Ribble and Alt Estuaries SPA and Ramsar site populations or distribution through the impacts assessed with the implementation of suitable mitigation.</i> <i>The commitments from the Transmission Assets will ensure that the permanent and temporary loss of habitat and disturbance and displacement during construction will be significantly reduced through the provision of alternative resting and feeding sites suitable for the waterbird features of the Ribble and Alt Estuaries SPA and Ramsar site.</i> <i>Therefore, in-combination impacts during the construction and operation and maintenance phase will not prevent the population or the distribution of each of the qualifying features from being maintained or restored.”</i>	<i>Therefore, in-combination impacts during the construction and operation and maintenance phase will not prevent the population or the distribution of each of the qualifying features from being maintained or restored.”</i>	
Table 1.112: Conclusions against the conservation objectives of the Martin Mere SPA and Ramsar site for all in-combination impacts	<i>States: “All Tier 1 projects identified would not adversely impact the integrity of the Martin Mere SPA and Ramsar site through the impacts assessed. The assessment in-combination mirrors that of the alone and the mitigation provided by the projects avoids an adverse effect on the habitats the SPA feature populations rely on. As the Applicants</i>	<i>“All Tier 1 projects identified would not adversely impact the integrity of the Ribble and Alt Estuaries SPA and Ramsar site through the impacts assessed. The assessment in-combination mirrors that of the alone and the mitigation provided by the project avoids an adverse effect on the habitats the SPA feature populations rely on.</i>	CoT107 amended. Temporary disturbance, displacement, and habitat loss effects will be mitigated through the implementation of Scenario 3 (seasonal working and screening measures), as secured through the Without Prejudice Removal of Lytham Moss - oEMP (S_SoSQ_55), Requirement 12 of the Without Prejudice Removal of Lytham Moss

ISAA Reference	Current wording (REP-024)	Proposed without prejudice amendment	Rationale
	<i>have committed to supplementary feeding and creating nearby habitat that is suitable for SPA qualifying features there will be no adverse effects on the extent and distribution of the habitats of the qualifying features at potential risk from the impact of temporary habitat loss and disturbance and displacement.</i> <i>Therefore, in-combination impacts during the construction and operation and maintenance phase will not prevent the extent and distribution, structure and function or the supporting processes on which the habitats of the qualifying features rely from being maintained or restored."</i> And <i>"All Tier 1 projects identified would not impact the Martin Mere SPA and Ramsar site populations or distribution through the impacts assessed with the implementation of suitable mitigation.</i> <i>The commitments from the Transmission Assets will ensure that the permanent and temporary loss of habitat and disturbance and displacement during construction will be significantly reduced through the provision of alternative resting and feeding sites suitable for the waterbird</i>	<i>Therefore, in-combination impacts during the construction and operation and maintenance phase will not prevent the extent and distribution, structure and function or the supporting processes on which the habitats of the qualifying features rely from being maintained or restored."</i> And <i>"All Tier 1 projects identified would not adversely impact the integrity of the Ribble and Alt Estuaries SPA and Ramsar site through the impacts assessed. The assessment in-combination mirrors that of the alone and the mitigation provided by the project avoids an adverse effect on the habitats the SPA feature populations rely on.</i> <i>Therefore, in-combination impacts during the construction and operation and maintenance phase will not prevent the population or the distribution of each of the qualifying features from being maintained or restored."</i>	and Morgan Land Powers - draft DCO (S_SoSQ_34), and the Without Prejudice Removal of Lytham Moss - Commitments Register (S_SoSQ_54).

ISAA Reference	Current wording (REP-024)	Proposed without prejudice amendment	Rationale
	<i>features of the Martin Mere SPA and Ramsar site.</i> <i>Therefore, in-combination impacts during the construction and operation and maintenance phase will not prevent the population or the distribution of each of the qualifying features from being maintained or restored."</i>		
Table 1.113: Conclusions against the conservation objectives of the Morecambe Bay and Duddon Estuary SPA for all in-combination impacts	<i>States: "No identified Tier 1 projects are deemed likely to adversely impact the integrity of the Morecambe Bay and Duddon Estuary SPA through the impacts considered in this in-combination assessment. The assessment in-combination mirrors that of the alone and the mitigation provided by the projects avoids an adverse effect on the habitats the SPA feature populations rely on. As the Applicants have committed to supplementary feeding and creating nearby habitat that is suitable for those qualifying features there will be no adverse effects on the extent and distribution of the habitats of the qualifying feature.</i> <i>Therefore, in-combination impacts during the construction and operation and maintenance phase will not prevent the extent and distribution, structure and function or the supporting processes on which</i>	<i>"All Tier 1 projects identified would not adversely impact the integrity of the Ribble and Alt Estuaries SPA and Ramsar site through the impacts assessed. The assessment in-combination mirrors that of the alone and the mitigation provided by the project avoids an adverse effect on the habitats the SPA feature populations rely on.</i> <i>Therefore, in-combination impacts during the construction and operation and maintenance phase will not prevent the extent and distribution, structure and function or the supporting processes on which the habitats of the qualifying features rely from being maintained or restored."</i> And <i>"All Tier 1 projects identified would not adversely impact the integrity of the Ribble and Alt Estuaries SPA and Ramsar site through the impacts assessed. The assessment in-combination mirrors that of the alone</i>	CoT107 amended. Temporary disturbance, displacement, and habitat loss effects will be mitigated through the implementation of Scenario 3 (seasonal working and screening measures), as secured through the Without Prejudice Removal of Lytham Moss - oEMP (S_SoSQ_55), Requirement 12 of the Without Prejudice Removal of Lytham Moss and Morgan Land Powers - draft DCO (S_SoSQ_34), and the Without Prejudice Removal of Lytham Moss - Commitments Register (S_SoSQ_54).

ISAA Reference	Current wording (REP-024)	Proposed without prejudice amendment	Rationale
	<i>the habitats of the qualifying features rely from being maintained or restored.”</i> And <i>“The commitment to temporary food provision and the creation of suitable habitat for the Morecambe Bay and Duddon Estuary SPA feature populations by the Transmission Assets will minimise any additional energy expenditure resulting from the impacts assessed. There are no Tier 1 projects consented or proposed that are likely to present an adverse impact on the SPA feature populations from the impacts assessed with the implementation of suitable mitigation.</i> <i>Therefore, in-combination impacts during the construction and operation and maintenance phase will not prevent the population or the distribution of each of the qualifying features from being maintained or restored.”</i>	<i>and the mitigation provided by the project avoids an adverse effect on the habitats the SPA feature populations rely on.</i> <i>Therefore, in-combination impacts during the construction and operation and maintenance phase will not prevent the population or the distribution of each of the qualifying features from being maintained or restored.”</i>	
Appendix F, Table 2.1	Table 2.1: All non-breeding waterbirds recorded during site-specific terrestrial surveys over the non-breeding periods in 2022/23 and 2023/24 (peak count data taken from Tables 1.12 and 1.13 in F3.4.2 Volume 3, Annex 4.2: Wintering and migratory birds	Table to be removed.	Table to be deleted as the mitigation set out in this table is no longer relevant to the ISAA to rule out AEol on any SPAs, due to the use of seasonal working and screening measures, set out above and the agreement reached with Natural England that AEol can be ruled out for

ISAA Reference	Current wording (REP-024)	Proposed without prejudice amendment	Rationale
	technical report – Part 2 of 2 (APP-093)) – (Table taken from S_D4_17.)		potential permanent impacts due to the absence of FLL in areas affected by this impact.

1.5 Implications for the ISAA Conclusions

- 1.5.1.1 The Applicants have considered whether the removal of the Scenario 1 and Scenario 2 temporary mitigation measures, and the consequential removal of Lytham Moss from the Order Limits, as well as the removal of the permanent mitigation area on land south of Newton-with-Scales (for the purposes of HRA), give rise to any new or materially different conclusion in the ISAA. It has been concluded that these updates do not give rise to any new or materially different conclusion in the ISAA. The justification is set out below

1.5.2 Temporary disturbance, displacement and habitat loss

- 1.5.2.1 As set out in previous sections, due to the implementation of seasonal working practices and screening (CoT107), there are predicted to be negligible impacts on the population or distribution of all qualifying features of SPAs considered in the ISAA, due to temporary disturbance, displacement and habitat loss effects during the construction phase of the project. The measures set out in CoT107 will ensure that effects on FLL will be avoided and/or minimised such that there will be no AEol predicted for any SPA considered in the ISAA. These mitigation measures (i.e. Scenario 3) are within the parameters of the maximum design scenario assessed in the ISAA, and Natural England has confirmed that these measures are sufficient to rule out AEol. As such, there is no change to the overall conclusions of the ISAA (REP6-024).

1.5.3 Permanent loss of supporting habitat

- 1.5.3.1 As set out in the Applicant's response to the Secretary of State's letter dated 20 May 2026 (C2-029.2), permanent habitat loss will not occur on areas of FLL for golden plover or any other qualifying bird species of any SPA assessed in the ISAA. Following further consideration and consultation, Natural England has confirmed that AEol arising from the permanent loss of FLL for golden plover, and for the other relevant features, can be ruled out without mitigation. On this basis, the permanent mitigation area at land south of Newton-with-Scales is no longer required for HRA purposes, and its removal does not alter the overall conclusions of the ISAA (REP6-024).

1.5.4 Overall conclusion on integrity

- 1.5.4.1 Taking the above together, every conclusion of no adverse effect on integrity reached in the HRA State 2 ISAA Part 3 (REP6-024) for the relevant European sites – including the Ribble and Alt Estuaries SPA and Ramsar site, Martin Mere SPA and Ramsar site, and the Morecambe Bay and Duddon Estuary SPA – is maintained. No Likely Significant Effect requires re-screening, no impact magnitude changes, and adverse effect on integrity continues to be ruled out beyond reasonable scientific doubt, both alone and in-combination with other plans and projects.

1.6 Summary

- 1.6.1.1 This addendum sets out, on a without prejudice basis, the updates to the HRA Stage 2 ISAA (REP6-024) arising from the SoS's letter (C3-001). In accordance with that request, the Applicants have removed, on a without prejudice basis, reliance on the temporary mitigation measures at Lytham Moss (CoT107) and land south of Newton-with-Scales (CoT120) for temporary disturbance and temporary habitat loss impacts to onshore ornithology (Scenarios 1 and 2) and have retained Scenario 3 (seasonal working and screening).
- 1.6.1.2 Natural England has confirmed that the Scenario 3 measures are sufficient to rule out AEol, and separately that AEol on the golden plover feature of the Ribble and Alt Estuaries SPA and Ramsar site from permanent habitat loss can be ruled out without mitigation. Consequently, the mitigation at land south of Newton-with-Scales is no longer required for HRA purposes — whether for temporary impacts (now addressed through Scenario 3) or for permanent impacts (ruled out without mitigation). The amendments identified in **Section 1.4** update and remove redundant references to commitments CoT107 and CoT120 whilst retaining, where relevant, a secured and Natural England-endorsed basis for each conclusion.
- 1.6.1.3 The changes comprise: (i) the without prejudice removal of Lytham Moss (CoT107), which represents a reduction of the Transmission Assets Onshore Order Limits; and (ii) the removal of reliance on the land south of Newton-with-Scales (CoT120) measures for HRA purposes. The land south of Newton-with-Scales is retained within the Order Limits for the mitigation of permanent EIA effects, and therefore does not reduce the Order Limits in its own right. The information provided within this without prejudice addendum confirms that none of the conclusions of the ISAA is altered and AEol continues to be ruled out beyond reasonable scientific doubt for all relevant European sites, for the project alone and in combination with other plans and projects.