

Our ref: DCOMHPTG

Your ref: EN0210005

[REDACTED]  
National Highways  
8 City Walk  
Leeds  
LS11 9AT  
[REDACTED]

20 March 2025

Dear Sir/Madam,

**Morven Hawthorn Pit Grid Connection Project | Transmission assets associated with the Morven Offshore Wind Project include offshore export cables, landfall infrastructure, onshore export cables, onshore substation, onshore grid connection cables and other related onshore infrastructure.**

Thank you for engaging with National Highways regarding the Development Consent Order [DCO] for the Morven Hawthorn Pit Grid Connection Project [MHPGC] (the Proposed Development).

We have reviewed the Environmental Impact Assessment [EIA] Scoping Report and would offer the following comments. Detailed comments are provided in the attached Technical Memorandum referenced TM01 (dated: 19/03/2025) and provided by JSJV on our behalf.

We support the proposed impacts proposed to be scoped into Traffic and Transport Assessment and subject to appropriate evidence being submitted in due course, we support the proposed approach to scope out the O&M traffic and transport impacts.

We support the proposed approach to consider the policy requirements of DfT Circular 01/2022 and NPPF (2024).

We would advise that base traffic flow data and collision data are available via the following links:

- <https://webtris.highwaysengland.co.uk/>
- [Road safety statistics: interactive data tools - GOV.UK](#)

We would expect the upcoming Preliminary Environmental Information Report to provide further information regarding sustainable transport accessibility, as per the vision-led policy requirements in DfT Circular (01/2022) and NPPF (2024).

We would recommend that the Applicant the engages with Durham County Council and Sunderland City Council to establish and agree a list of committed developments to be considered within the upcoming Preliminary Environmental Information Report.

It is stated that “Trenchless installation methods to be used where practicable. Further work will be undertaken when the MHPGC project has been defined in more detail to identify where trenchless installation methods can be used”. In accordance with National Highways’ document: ‘Planning for the future - A guide to working with National Highways on planning matters’ (October 2023), we request that the Applicant enters discussions with us at the earliest opportunity to agree any construction methods proposed that could be relevant to the SRN.

We support the proposed approach to prepare a Public Rights of Way Management Plan, an Outline Construction Traffic Management Plan, and An Abnormal Indivisible Load Access Study. The attached TM01 explains our expectations and comments for each of these documents.

I trust this response is helpful, but should you require any further information please do not hesitate to contact me.

Yours sincerely

[Redacted signature block]

## DCO - Morven Hawthorn Pit Grid Connection Project

Case ref:	DCOMHPTG	Document ref:	TM01	Date issued:	19/03/2025
Prepared for:	Rebecca Garrett	Prepared by:	John Williams / Andy Tennant	Reviewed / approved by:	James Quigley

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### Headline summary

#### Planning outcome

*The recommendation to National Highways is **Pre-application / Scoping Response**. Comments are made on the pre-application / scoping in order to assist defining an appropriate assessment of the Strategic Road Network.*

#### Site location



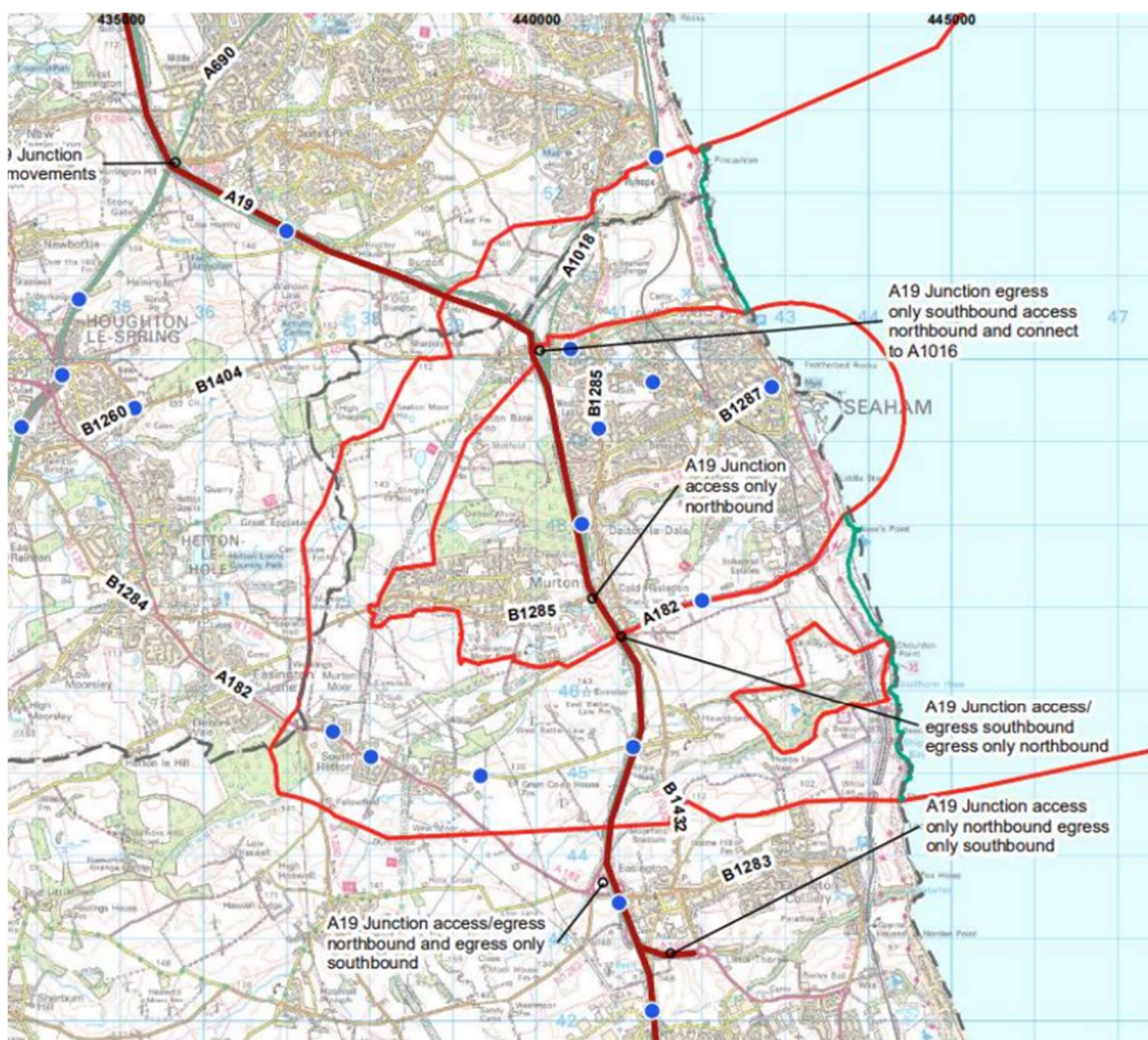
#### Technical summary

- JSJV has provided commentary on the proposed approach set out in the Scoping Report.
- JSJV has provided links to open data sources that could be used by the Applicant when preparing the upcoming Preliminary Environmental Information Report.
- JSJV has recommended that the Applicant enters discussions with National Highways structures and geotechnical teams at the earliest opportunity to agree any construction methods proposed that could be relevant to the SRN.
- JSJV supports the impacts proposed to be scoped into Traffic and Transport Assessment and subject to appropriate evidence being submitted in due course, we support the proposed approach to scope out the O&M traffic and transport impacts.

## 1 Overview

- 1.1 On behalf of National Highways, the Jacobs Systra Joint Venture [JSJV] has undertaken a review a Development Consent Order [DCO] for the Morven Hawthorn Pit Grid Connection Project [MHPGC] (the Proposed Development). The following information has been provided and is the subject of this review:
  - Environmental Impact Assessment [EIA] Scoping Report.
- 1.2 The proposed development is a Nationally Significant Infrastructure Project [NSIP] and the Applicant is Morvern Offshore Wind Limited.
- 1.3 The EIA Scoping Report has been prepared to support a request for a formal scoping opinion and provide all stakeholders with sufficient information on the proposals specifics to the MHPGC Project to enable meaningful pre-application consultation.
- 1.4 On this basis, the JSJV Technical Memorandum [TM] comments on the suitability of the information with discussion provided in relation to the details relevant to understanding the impacts of the proposals at the Strategic Road Network [SRN].
- 1.5 Given the location of the development site, it is advised that National Highways will need to understand the likely traffic impact of the proposals upon the A19 and also the impacts with regards the adjacency of the proposals to the SRN. These matters are the focus of this TM.
- 1.6 The Site in relation to the SRN is shown in Figure 1.

*Figure 1: Application site in relation to A19 (extracted from EIA Scoping Report)*





## 2 NSIP Review Process

2.1 The major infrastructure projects dealt with by the Planning Inspectorate under the Planning Act 2008 [PA2008] are known as NSIPs. Projects are within the six general fields of energy; transport; water; waste water; waste and business and commercial. Examples include power stations; railways and major roads; reservoirs; harbours; airports; offshore wind farms and sewage treatment works. The thresholds for NSIPs are set out in sections 15 to 30 of the PA2008.

2.2 The PA2008 process was introduced to streamline the decision-making process for major infrastructure projects. The six stages in the process are:

- **Pre-application:** Before submitting an application, potential applicants have a statutory duty to carry out consultation on their proposals. The Planning Inspectorate cannot consider representations about the merits of a proposed application at the Pre-application stage of the process.
- **Acceptance:** The Acceptance stage begins when an applicant submits an application for development consent to the Planning Inspectorate. There follows a period of up to 28 days (excluding the date of receipt of the application) for the Planning Inspectorate, on behalf of the Secretary of State, to decide whether or not the application meets the standards required to be accepted for examination.
- **Pre-examination:** If the application is accepted for examination, the public will then be able to register with the Planning Inspectorate to become an Interested Party by making a Relevant Representation. A Relevant Representation is a summary of a person's views on an application, made in writing. An Examining Authority is also appointed at the Pre-examination stage, and all Interested Parties will be invited to attend a Preliminary Meeting, run and chaired by the Examining Authority. Although there is no statutory timescale for this stage of the process, it usually takes approximately three months from the Applicant's formal notification and publicity of an accepted application.
- **Examination:** The Planning Inspectorate has up to six months to carry out the examination. During this stage Interested Parties who have registered by making a Relevant Representation are invited to provide more details of their views in writing. Careful consideration is given by the Examining Authority to all the important and relevant matters including the representations of all Interested Parties, any supporting evidence submitted and answers provided to the Examining Authority's questions set out in writing or posed at hearings.
- **Recommendation and Decision:** The Planning Inspectorate must prepare a report on the application to the relevant Secretary of State, including a recommendation, within three months of the close of the six-month Examination stage. The relevant Secretary of State then has a further three months to make the decision on whether to grant or refuse development consent.
- **Post-decision:** Once a decision has been issued by the relevant Secretary of State, there is a six-week period in which the decision may be challenged in the High Court. This process of legal challenge is known as Judicial Review.

2.3 The MHPGC application was submitted on 13 February 2025 and is currently at the pre-application stage.

## 3 Policy

3.1 DfT's Circular 01/2022 states that *"the policies may also be considered important and relevant to decisions on nationally significant infrastructure projects (NSIPs) in the absence of a stated position in the relevant national policy statement"*.

3.2 The Traffic and Transport chapter of the Scoping Report for the MHPGC application has been prepared in accordance with the following policies:

- Overarching National Policy Statement [NPS] (EN-1) (2023);
- National Planning Policy Framework [NPPF] (2023);
- County Durham Local Plan (2020);
- Sunderland Local Plan (2020); and,
- Department for Transport's [DfT] Circular (01/2022);

3.3 JSJV supports the consideration of the above policies and would support their consideration within the upcoming Preliminary Environmental Information Report. However, JSJV would suggest that the updated version of the NPPF should be considered when preparing the Preliminary Environmental Information Report (December 2024, at the time of writing).

## 4 Existing Situation

### EIA Scoping Boundary

4.1 The MHPGC project scoping boundary encompasses parts of the A19 as can be seen in Figure 1.

4.2 It is stated that:

*"The roads that provide connection between the SRN and the MHPGC Project access points and between MHPGC access points will form the Traffic and Transport Study Area once the MHPGC Project has been refined (referred to as the EIA Traffic and Transport Study Area). For the purpose of scoping, the Traffic and Transport Study Area takes into account the roads that are likely to provide access to the SRN for traffic generated by the MHPGC Project and locations on the transport network that will be crossed by the Onshore MHPGC Project Scoping Boundary. As the design of the MHPGC Project is developed, the Traffic and Transport Study Area will be defined in more detail once access points from the highway network to construction locations and compounds are known and roads to be used for access are confirmed."*

4.3 JSJV supports the approach to refine the Traffic and Transport Study Area as the project is developed and would suggest that the following SRN junctions fall within the project scoping boundary and should, therefore, be considered (where appropriate) within the upcoming Preliminary Environmental Information Report:

- A19 / A182 / B1283 (Easington) Junction;
- A19 / A182 / B1285 (Hawthorn) Junction; and,
- A19 / B1404 (Seaton Lane) Junction.

4.4 Furthermore, subject to the residual cumulative impact of the proposed development, other SRN junctions may need to be considered within the upcoming EIA.

### Traffic Flow and Collision Analysis

4.5 The Scoping Note refers to 2023 traffic flow data for the A19 and proposes that up-to-date traffic flow survey data will form the EIA Traffic and Transport Study Area for the traffic and transport assessment within the Preliminary Environmental Information Report once the traffic routes are confirmed. JSJV would suggest that this approach is appropriate and would advise that traffic survey data is available from National Highways' WebTRIS platform (available at: <https://webtris.highwaysengland.co.uk/>). If surveys are required, they should be undertaken in accordance with TAG Unit M.12 (May 2024), which states that "surveys should be carried out during a 'neutral', or representative, period".

- 4.6 The Scoping Report states that accident records will be sourced for the most recent five-year period of available and verified data for the roads and junctions that form the EIA Traffic and Transport study area. JSJV supports this approach and would advise that collision data is available via the DfT's Road Safety Statistics website ([Road safety statistics: interactive data tools - GOV.UK](#)).

#### Sustainable and Active Travel Modes

- 4.7 The Scoping Report provides a brief overview of the sustainable and active travel infrastructure in close proximity to the MHPGC project scoping boundary. JSJV would expect the upcoming Preliminary Environmental Information Report to provide further information regarding the accessibility of the site (and construction worker compounds) via sustainable and active modes of travel, as per the vision-led policy requirements in DfT Circular (01/2022) and NPPF (2024).

#### Planned Transport Improvements and Committed Developments

- 4.8 DfT Circular 01/2022 states that *"planned improvements to the SRN or local road network should also be considered in any assessment where there is a high degree of certainty that this will be delivered"*.
- 4.9 JSJV would advise that the following committed transport improvement schemes may need to be considered within the upcoming EIA:
- A19 / A182 / B1285 (Hawthorn) Junction improvement scheme. Details are available via Durham County Council's website: <https://www.durham.gov.uk/A19/A182#:~:text=The%20existing%20number%20of%20traffic,A19%20will%20also%20be%20implemented>.
  - A19 / B1404 (Seaton Lane) Junction improvement scheme. Details are available via Durham County Council's website: <https://www.durham.gov.uk/seatonlane>
- 4.10 JSJV would suggest that the Applicant should engage with Durham County Council and Sunderland City Council to establish and agree a list of committed developments to be considered within the upcoming Preliminary Environmental Information Report.

## 5 Proposed Development and Potential Impacts

- 5.1 The proposed development's onshore (England) elements comprise:
- High Voltage Direct Current (HVDC) export cables: Onshore cables that connect the offshore HVDC export cables to the Land Sub-station (LSS).
  - LSS: A purpose-built LSS site will be required to house the electrical equipment required to adjust the power quality and power factor required to connect to the National Grid substation at Hawthorn Pit.
  - High voltage alternating current (HVAC) export cables: Cables connecting the LSS to the existing National Grid substation at Hawthorn Pit.
  - Grid connection: The existing National Grid substation at Hawthorn Pit.
- 5.2 It is proposed that three types of construction vehicle movements will be associated with the MHPGC project: HGV movements to and from the SRN and the MHPGC project construction access, inter-project HGV movements between different construction accesses, and compounds and construction staff vehicle movements. The Scoping Report proposes that there will be a full assessment of the anticipated volume of construction traffic movements will be identified within the EIA Report. JSJV supports this approach.
- 5.3 The Scoping Report proposes that should the MHPGC project not be repowered, then it will be decommissioned, however, it is anticipated that below ground cables would

be left in situ and therefore traffic impacts in the decommissioning phase are anticipated to be significantly lower than the construction phase.

- 5.4 The Scoping Note proposes which potential impacts are to be scoped into the project assessment for traffic and transport. JSJV has commented on each of these below.

*Table 1: Impacts proposed to be scoped into Traffic and Transport EIA*

Impact	Project Phase			JSJV comments
	C	O&M	D	
Severance	Yes	No	Yes	JSJV supports the proposed “ <i>Data Collection and Analysis Required to Characterise the Baseline</i> ” and “ <i>Proposed Approach to Assessment</i> ”.
Driver Delay	Yes	No	Yes	
Non-Motorised User Amenity	Yes	No	Yes	
Non-Motorised User Delay	Yes	No	Yes	
Fear and Intimidation	Yes	No	Yes	
Road Safety	Yes	No	Yes	
Impacts of Abnormal and Indivisible Loads	Yes	No	Yes	
Impacts of Hazardous Loads	Yes	No	Yes	

- 5.5 The Scoping Report proposes that the MHPGC project will impact all of the above in the construction and decommissioning phases, but not the operational phase of the project. It is proposed that the O&M traffic and transport impacts will be scoped out because “O&M traffic is anticipated to be minimal, limited to infrequent on site inspections and maintenance activities”. Considering the proposals within the MHPGC project, JSJV would suggest that the approach taken is appropriate, however, would expect appropriate information to be presented to justify the proposed approach in the upcoming Preliminary Environmental Information Report. Furthermore, JSJV would suggest that National Highways should review any SRN impacts on a case-by-case basis and in accordance with DfT Circular 01/2022.

## 6 Designed Measures

- 6.1 It is stated that:

*“As part of the project design process, a number of designed in measures (primary and tertiary) will reduce the potential for impacts on traffic and transport. As there is a commitment to implement these measures, they are considered inherent to the design of the MHPGC Project. The determination of magnitude and significance will assume the implementation of such measures. Some of these measures are considered standard industry practice for this type of development. The requirement for any additional (secondary) mitigation measures will be dependent on the significance of the impacts on traffic and transport receptors. The requirement for and feasibility of any mitigation measures will be consulted upon with statutory consultees throughout the EIA process”.*

- 6.2 JSJV has summarised the proposed Designed In Measures for Traffic and Transport below.



*Table 2: Designed in measures proposed for traffic and transport*

Designed Measures	JSJV Comments
Trenchless installation methods to be used where practicable. Further work will be undertaken when the MHPGC project has been defined in more detail to identify where trenchless installation methods can be used.	<u>In accordance with National Highways' document: 'Planning for the future - A guide to working with National Highways on planning matters' (October 2023), JSJV would suggest that the Applicant enters discussions with National Highways at the earliest opportunity to agree any construction methods proposed that could be relevant to the SRN.</u>
The Public Rights of Way Management Plan [PWoR MP] will identify appropriate management measures to provide a diversion of similar enhanced amenity.	<u>JSJV supports this approach.</u>
An Outline Construction Traffic Management Plan [CTMP].	<u>JSJV supports this approach and has provided further details of what the CTMP should include in section 7 of this TM.</u>
An Abnormal Indivisible Load [AIL] Access Study will outline the AIL delivery routes and appropriate management measures.	<u>JSJV would direct the Applicant towards National Highways' Electronic Service Delivery for Abnormal Loads (ESDAL) system that must be used to notify National Highways, the local highway authorities and the Police of ALL movement details, times, types and route: <a href="https://nationalhighways.co.uk/road-safety/abnormal-loads-and-the-esdal-system/">https://nationalhighways.co.uk/road-safety/abnormal-loads-and-the-esdal-system/</a>. The ESDAL system must be used to notify the aforementioned authorities prior to the departure of each AIL. A full road condition survey of any proposed AIL delivery route must also be undertaken both before and after delivery. The method of the surveys will be discussed and agreed with the relevant highway authorities prior to being undertaken.</u>  <u>Swept path analyses must be provided for any AIL movements via the SRN.</u>

- 6.3 JSJV will comment on the requirement for any additional (secondary) mitigation measures once we have reviewed the significance of the impacts on traffic and transport receptors.
- 6.4 JSJV would, however, note that subject to the construction phase trip generation, and to ensure a vision-led approach is adopted in accordance with DfT Circular 01/022 and NPPF (2024), a Construction Worker Travel Plan may be required.

## 7 Construction

7.1 The Scoping Note states that the cable route will cross several roads and a railway line, which will likely be crossed using trenchless techniques, where practicable to minimise the potential impact on these networks.

7.2 Circular 01/2022 paragraph 54 states that:

*“Due consideration must be given to the geotechnical integrity of land within the SRN where development would increase the load of, or otherwise alter, an embankment. In such cases, supporting plans and reports must identify the extent of the proposed works and how any risk would be managed in accordance with the DMRB”.*

7.3 JSJV would suggest that there is potential for impacts on the SRN from the construction of the MHPGC Project. JSJV would suggest that the Applicant should, therefore, engage with National Highways’ structural and geotechnical teams to agree construction methods.

7.4 The Scoping Note proposes that an outline Construction Traffic Management Plan [CTMP] will be prepared outlining measures to mitigate the impact of construction traffic including routing. JSJV would suggest that the CTMP should be produced and agreed with National Highways. JSJV would suggest that the CTMP will need to include at least the following:

- Length of construction period;
- Hours of operation;
- Peak hour trip generation (including type of vehicles);
- Construction traffic routes;
- Construction traffic assignment at the SRN (if appropriate);
- Access arrangements;
- Staffing numbers;
- Contractor parking;
- Details of delivery arrangements (including for any abnormal loads); and
- Mitigation measures – limited delivery times (and details of enforcement e.g., penalty clauses for contractor, noise reduction, wheel washing).