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Your ref EN0210008

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Planning Inspectorate Ref: EN0210008

Application by Ørsted East Irish Sea Transmission Limited (the applicant) for an Order granting Development Consent for the East Irish Sea Transmission Project (the proposed development)

Planning Act 2008 (as amended) and The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations) – Regulations 10 and 11

Application by National Grid Electricity Transmission plc (the Applicant) for an Order granting Development Consent for the Sea Link (the Proposed Development)

Scoping consultation and notification of the Applicant's contact details and duty to make available information to the Applicant if requested

1. Introduction

1.1. South Ribble Borough Council (SRBC) welcomes the opportunity to comment on the East Irish Sea Transmission Project Environmental Impact Assessment Scoping Report dated August 2025. This letter comprises SRBC's response under Section 43(1) of the Planning Act 2008.

Comments are made on the basis that details of the route proposed for onshore works and placement of related infrastructure, have not been provided to, or agreed with this Council, and as such comments are subject to change.

1.2. To date, pre-application discussions have taken place and intimated two potential routes; both of which follow the Rochdale Envelope principle.

- Potential Route A: With landfall north of the River Ribble from Fleetwood, crossing across the river towards connection point at National Grid, Penwortham
- Potential Route B: running southwards from National Grid, Penwortham towards Crosby in Sefton Metropolitan Borough

2. Proposed Development

2.1. The Proposed Development involves installation of up to four offshore export cables, twelve onshore export cables, up to three offshore booster stations, one onshore booster station, an Onshore Substation (OnSS), and associated Energy Balancing Infrastructure (EBI), connecting the Mooir Vannin Generation Project (Isle of Man territorial waters) to the National Grid at Penwortham.

2.2. This response outlines the Council's assessment of the Scoping Report pursuant to Regulation 10 of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 and sets out the Council's requirements for the Environmental Statement (ES). The Council recognises the strategic importance of the proposed development in supporting the UK's Net Zero commitments but emphasises that local impacts must be robustly assessed and mitigated as part of any future ES to accompany a forthcoming application.

2.3. Proposed development has the potential to directly impact on land within the SRBC area in terms of proposed landfall and associated onshore works. The Council's remit includes evaluating the adequacy of topic coverage, site-specific baseline data, methodological approaches, and proposed mitigation strategies. The decision maker has a statutory duty to ensure that local environmental, heritage, and socio-economic sensitivities are properly addressed, in line with national and local planning policy.

2.4. This opinion focuses on the onshore landfall and cable corridor, the Onshore Substation (OnSS) and Energy Balancing Infrastructure (EBI), and associated construction works; most of which depending on the route chosen could sit within the jurisdiction of SRBC. Offshore elements will largely be considered by other organisations who will have been consulted separately by the Planning Inspectorate.

3.1. Policy and Legislative Context

3.2. National Policy Statements (NPSs) – Proposed Development falls under the remit of NPS EN-1 (Overarching Energy NPS) and EN-5 (Electricity Networks Infrastructure). EN-1 sets out principles for sustainable energy infrastructure, EIA methodology, mitigation, and cumulative impact assessment. EN-5 provides guidance specific to electricity transmission, including cable landfalls, substation sitting and operational considerations.

3.3. EIA Regulations – The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017, as amended, require that the ES provides sufficient information to assess the likely significant effects of the Proposed Development.

3.4. Planning (Listed Building & Conservation Areas) Act 1990 (PLBCA) – S.66(a) and 16(2) impose a duty to pay special regard to the desirability of preserving a Listed Building or its setting, or any features of special architectural or historic interest.

3.5. The South Ribble Development Plan – of particular relevance to this proposal for SRBC are:

Central Lancashire Core Strategy 2012

- Policy 1 (Locating Growth)
- Policy 2 (Infrastructure)
- Policy 16 (Heritage Assets)
- Policy 17 (Design of New Buildings)
- Policy 21 (Landscape Character Areas)
- Policy 22 (Biodiversity & Geodiversity)
- Policy 26 (Crime & Community Safety)
- Policy 27 (Sustainable Resources and New Development)
- Policy 28 (Renewable and Low Carbon Schemes)
- Policy 29 (Water Management)
- Policy 30 (Air Quality)
- Policy 31 (Agricultural Land)

South Ribble Local Plan 2012-2026

- Policy G1 (Green Belt)
- Policy G13 (Trees Woodland and Development)
- Policy G16 (Biodiversity and Nature Conservation)
- Policy G17 (Design Criteria for New Development)
- Chapter J (Tackling Climate Change)

Central Lancashire Biodiversity & Nature Conservation Supplementary Planning Document.

South Ribble Renewable and Low Carbon Energy Supplementary Planning Document

3.6. Emerging Central Lancashire Local Plan – The Central Lancashire authorities (South Ribble, Chorley and Preston) are preparing a new development plan: the Central Lancashire Local Plan (CLLP) 2023-2041. Preparation of the plan is in accordance with the Town and Country Planning (Local Planning) (England) Regulations 2012. South Ribble Borough Council agreed, on the 29 January 2025, to publication of the CLLP prior to its formal submission to the Secretary of State for examination. The Plan was submitted to the Secretary of State on 30th June 2025

At this advanced submission stage, the CLLP becomes a material consideration in the determination of planning applications. The National Planning Policy Framework (NPPF) directs that decision-takers may give weight to relevant policies in emerging plans according to their stage of preparation, the extent to which there are unresolved objections to relevant policies, and their degree of consistency with policies in the NPPF.

Although at its current stage the CLLP carries limited weight, the relevant policies are as follows.

- CC1 (Climate Change)
- CC2 (Renewable Energy Generation and District Heating Networks)
- CC3 (Reducing Energy Consumption)
- EN2 (Design Criteria for New Development)
- EN4 (Amenity)
- EN6 (Biodiversity Net Gain)
- EN7 (Designated Sites for Nature Conservation)
- EN8 (Trees Woodland and Hedgerow)
- EN9 (Protected Species)
- EN10 (Development and Flood Risk)
- EN11 (Water Resource Management)
- EN13 (Heritage Assets and Archaeology)
- EN14 (Environmental Quality)
- EN15 (Green Belt)
- EN16 (Protection of Agricultural Land)
- EN19 (Landscape Character)
- HC1 (Health and Well Being)
- ID1 (Infrastructure Planning Principles)

3.7. Other Guidance – The Council also considers guidance from Historic England, Natural England, and Lancashire Minerals and Waste Local Plan are relevant to the assessment of the ES and the application

4. Local Baseline Context and Assessment of the Applicant's Scoping Report

4.1. The Scoping Report includes chapters covering legislation and policy context, project description, EIA methodology, and a wide range of environmental topics. At a strategic level, these elements are generally sufficient, but more detail is requested.

4.1. *Geography, Landscape and Land Use:* The area surrounding the National Grid facility (NG) at Penwortham is an open, semi-rural location with sporadically placed dwellings and commercial/farm properties. The River Ribble Ramsar and Alt Estuary lies west of the site, with the main settlement of Penwortham some way to the east. The site and its surroundings are designated as Green Belt by both the adopted and emerging local plan documents. The River Ribble also runs in an east to west direction approximately 700m north of the NG facility. Land surrounding is predominately in agricultural use.

4.2. The area proposed for Potential Route B within the confines of SRBC would run south of the NG facility through or between smaller rural communities and deep tracts of agricultural land. Longton Brickcroft Nature Reserve is located near to the eastern side of the proposed route, and there is potential for crossing of the River Douglas on the western side where the identified pathway is proposed; albeit this pathway is likely to reduce as more details of the proposal emerge. All of these in addition to landscape character areas

identified in the Lancashire Landscape Character Assessment (December 2000), must be fully considered in the ES.

4.3. Similarly, cable laying will inevitably disturb and impact upon areas of Green Belt and agricultural land; both in terms of useability, visual amenity and land quality. This impact needs to be fully considered at all stages of the submission and forms a key part of the ES.

4.4. The Council identifies multiple deficiencies, particularly regarding specific impacts, limited baseline data, and methodological clarity. Landfall Options (Potential Route A v Potential Route B) provides only a general description of landfall selection methodology, lacking a robust comparative assessment, and whilst this is necessary at this stage, it does make it extremely difficult to comment, and for those comments to be given credible consideration when the scope for development is so wide. The ES should provide a full analysis of both landfall options, with justification for the preferred option based on environmental, technical, and socio-economic criteria.

4.5. More information is also needed in terms of Landscape and Visual Impact. LVIA is mentioned, but the report omits reference to specific viewpoints, photomontage locations, and detailed baseline characterisation. Neither are sensitive receptors such as landscape character, residential areas, and recreational sites identified. The ES must include detailed visual mapping, receptor sensitivity analysis, and cumulative visual effects

4.6. *Heritage Assets* – SRBC includes a range of heritage assets, including statutorily and locally listed buildings, and known archaeological sites. One listed building is present adjacent to NG (Hesketh Farm) and recent archaeological assessment of Potential Route A suggests that there may be undetermined archaeological deposits which need to be investigated. This is likely therefore around the path of Potential Route B.

4.7. Adopted local and national policy requires that development conserves the significance and setting of heritage assets, and that assessments follow Historic England and NPPF guidance, yet the Scoping Report does not identify designated or non-designated heritage assets within the SRBC landfall areas, and there is insufficient assessment of setting impacts or potential archaeological remains.

4.8. *Socio-Economic Profile* – SRBC's local economy in the areas defined by both Potential Route A and B relies primarily on recreation, agriculture and small-scale commerce/industry. Whilst tourism is a factor to this part of the Borough, it is less reliant on proposed development areas than other Local Authority areas, although well used cycle and walking networks exist in the area and must be protected during and post construction. Impacts on amenity, access, loss of income and general economy, and perceived lost residential amenity and safety must be considered.

4.8. *Transport Infrastructure*: The onshore cable corridor intersects a network of rural and urban roads, with key junctions sensitive to HGV movements. Construction traffic management will be critical to minimise severance and road safety impacts. Early, on the ground survey work will be necessary to properly assess the suitability and capacity of proposed routes. Lancashire County Council as the highway's authority are a critical stakeholder in this regard. Ultimately this Council will defer to LCC on matters relating to highways safety and capacity, but the ES should include detailed construction traffic assessments, route strategies, and provide clarity over the anticipated duration of works so that measures to minimise severance and road safety risks can be robustly assessed.

4.9. *Preston Western Distributor Road and River Ribble Crossing* - No consideration has been given to the impact on the potential future bridge crossing over the River Ribble linking the new Preston Western Distributor Road (Edith Rigby Way) at Lea with Penwortham to the south-east. This project aimed to reduce congestion on the M6 and within Preston itself and it is understood to remain a feasible project that could be delivered in the future. The ES should include an assessment of the scheme in the context of this project and ensure that it would not prejudice the delivery of a river crossing. No consideration has been given either to crossing of the River Ribble by other schemes of a similar nature (i.e. Morgan and Morecambe) and what the cumulative impact of potentially three or more separate crossings might be.

4.10. *Ecology and Climate Change* – There are a number of Sites of Special Scientific Interest and Biological Heritage Sites in SRBC, as well as Local Nature Reserves. Notably, the Ribble Estuary is designated as both a Ramsar site and Special Protection Area. The Ribble Marshes are also designated as a National Nature Reserve, covering 4,520 Ha of intertidal and saltmarsh habitats at the mouth of the Ribble Estuary. The Ribble Estuary is of considerable value to bird life and it is an important part of the network of wetland sites in Western Europe and the most important wildfowl site in the UK. Regardless of the route proposed, these and the wider area which is affected by or affects these protected zones need to be properly assessed by the ES

4.11. Adopted policy noted at Section 3 (above) requires minimisation of adverse impacts on the environment and flood-prone areas and so the information that is provided to allow that assessment must be suitably detailed and robustly presented for all potential options. The ES must incorporate climate change cumulative effects and climate change allowances, flood modelling, and mitigation measures where relevant.

5. Summary

In summary, this Council would seek to have the following robustly assessed within the EA:

Landfall and Route Selection

- Provide comparative assessment of Potential Route A versus Potential Route B landfall options, including environmental, technical, heritage, and socio-economic criteria.

- Demonstrate that the selected option represents the least environmentally damaging practicable solution.

Landscape and Visual Impact

- Include visual mapping, receptor sensitivity analysis, and photomontages for representative viewpoints along the cable corridor, landfall, location and associated infrastructure.
- Assess night-time lighting and cumulative visual effects with other regional NSIPs (i.e. Morgan and Morecambe wind farm project).

Ecology

- Properly identify ecological receptors and prepare appropriate baseline evidence and assessments, particularly with regards to protected habitats.
- Respond appropriately to guidance and requirements relating to provision of ecological enhancement, mitigation and Biodiversity Net Gain.

Heritage and Archaeology

- Identify heritage assets within scoping areas, including listed buildings, scheduled monuments, conservation areas and non-designated heritage assets, including locally listed buildings.
- Provide setting impact assessments in line with Historic England guidance.
- Conduct archaeological desk-based and field assessments for intertidal and terrestrial zones.

Human and Residential Impacts

- Settlement-specific assessments of construction and operational effects on local communities, particularly with regard to noise and vibration.
- Propose mitigation including noise bunds, landscape screening, traffic management, and construction hour restrictions where relevant and informed by technical analysis.

Traffic and Transport

- Quantify HGV movements, routing, and peak construction periods.
- Assess impacts on local road safety, congestion, and severance of highways,
- Provide mitigation including haul route strategies and construction traffic management plans.

Flood Risk and Hydrology

- Produce site-specific Flood Risk Assessments where relevant.

Socio-Economic and Tourism Impacts

- Fully assess recreation, cycle, walking and other public access areas
- Analyse visitor perception impacts and potential reputational effects during construction.
- Propose mitigation including staged works, alternative access provision, and clear public information strategies.

Climate Change and Cumulative Impacts

- Provide quantitative assessment of carbon emissions and climate impacts of the project.
- Assess cumulative and inter-related impacts with other regional projects, including landscape, traffic, and socio-economic effects.
- Include mitigation and monitoring measures to minimise adverse effects.

Baseline Information

- The ES should be supported by robust, up-to-date information. Surveys and supporting information should be submitted with the ES and in a timely fashion.

6. Conclusion

The Council requests that the Secretary of State instructs the Applicant to provide comprehensive site-specific analysis, mitigation proposals, and monitoring commitments in the ES to ensure robust decision-making and protection of local environmental, heritage, and socio-economic resources.

Likewise, further assessment, analysis and justification should be provided with respect to the preferred final route of the cabling and onshore landfall from the Mooir Vannin windfarm project, and in particular a thorough appraisal of the potential route options.

The Council requests that the applicant should take a proactive approach and should front-load the process in order to provide as much detail as early as possible. The Council expects to see all information necessary to assess the likely impacts to be submitted at the beginning of any examination and where appropriate for the applicant to engage with the Council and other relevant parties' pre-examination.

This representation is submitted for, and on behalf of South Ribble Borough Council. Should you have any comments or questions please do not hesitate to contact us

Kind regards



Chief Planning Officer / Head of Planning and Enforcement