



MORECAMBE



FLOTATION ENERGY

Morecambe Offshore Windfarm: Generation Assets Environmental Statement

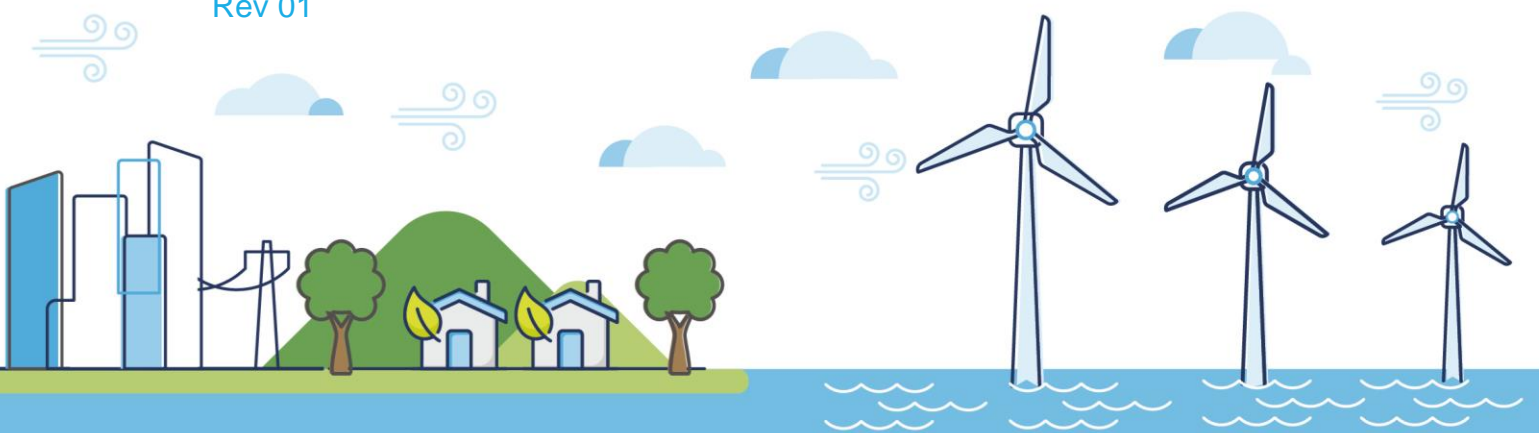
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Chapter 22 Traffic and Transport

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Glossary of Acronyms

CEA	Cumulative Effects Assessment
DCO	Development Consent Order
DESNZ	Department for Energy Security and Net Zero
EIA	Environmental Impact Assessment
ES	Environmental Statement
LSE	Likely Significant Effects
NPS	National Policy Statement
NSIP	Nationally Important Infrastructure Projects
OSP	Offshore substation platform
O&M	Operation and Maintenance
PATP	Port Access and Transport Plan
PEIR	Preliminary Environmental Information Report
PINS	Planning Inspectorate
UK	United Kingdom
WMFC	Westmorland and Furness Council
WTG	Wind turbine generators

Glossary of Terminology

Applicant	Morecambe Offshore Windfarm Ltd
Application	This refers to the Applicant's application for a Development Consent Order (DCO). An application consists of a series of documents and plans which are published on the Planning Inspectorate's (PINS) website.
Generation Assets (the Project)	Generation assets associated with the Morecambe Offshore Windfarm. This is infrastructure in connection with electricity production, namely the fixed foundation wind turbine generators (WTGs), inter-array cables, offshore substation platform(s) (OSP(s)) and possible platform link cables to connect OSP(s).
Inter-array cables	Cables which link the WTGs to each other and the OSP(s).
Landfall	Where the offshore export cables would come ashore.
Morgan and Morecambe Offshore Wind Farms: Transmission Assets	The transmission assets for the Morgan Offshore Wind Project and the Morecambe Offshore Windfarm. This includes the OSP(s) ¹ , interconnector cables, Morgan offshore booster station, offshore export cables, landfall site, onshore export cables, onshore substations, 400kV cables and associated grid connection infrastructure such as circuit breaker infrastructure. Also referred to in this chapter as the Transmission Assets, for ease of reading.
Offshore export cables	The cables which would bring electricity from the OSP(s) to the landfall.
Offshore substation platform(s)	A fixed structure located within the windfarm site, containing electrical equipment to aggregate the power from the WTGs and convert it into a more suitable form for export to shore.
Onshore export cables	The cables which would bring electricity from landfall to the onshore project substation and from the onshore project substation to a National Grid substation.
Onshore substation	Part of an electrical transmission and distribution system. Substations transform voltage from high to low, or the reverse by means of electrical transformers.
Platform link cable	An electrical cable which links one or more OSP(s).
Windfarm site	The area within which the WTGs, inter-array cables, OSP(s) and platform link cables will be present.
Wind turbine generator (WTG)	A fixed structure located within the windfarm site that converts the kinetic energy of wind into electrical energy.

¹ At the time of writing the Environmental Statement (ES), a decision had been taken that the offshore substation platforms (OSP(s)) would remain solely within the Generation Assets application and would not be included within the Development Consent Order (DCO) application for the Transmission Assets. This decision post-dated the Preliminary Environmental Information Report (PEIR) that was prepared for the Transmission Assets. The OSP(s) are still included in the description of the Transmission Assets for the purposes of this ES as the Cumulative Effects Assessment (CEA) carried out in respect of the Generation/Transmission Assets is based on the information available from the Transmission Assets PEIR.



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Traffic and Transport

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22 Traffic and Transport

22.1 Introduction

- 22.1 This chapter of the Environmental Statement (ES) describes the proposed approach to assessment of the traffic and transport impacts of construction, operation and maintenance, and decommissioning of the Morecambe Offshore Windfarm Project Generation Assets (the Project).
- 22.2 The Project includes the generation assets to be located within the offshore windfarm site (wind turbine generators (WTGs), inter-array cables, offshore substation platform(s) (OSP(s)) and possible platform link cables to connect OSPs). The Environmental Impact Assessment (EIA) of the transmission assets, including offshore export cables to landfall and onshore infrastructure, is part of a separate Development Consent Order (DCO) application as outlined in **Chapter 1 Introduction** (Document Reference 5.1.1).
- 22.3 The potential cumulative traffic and transport effects with the Morgan and Morecambe Offshore Wind Farms: Transmission Assets (defined in the glossary) have been considered in **Section 22.6**.

22.2 Policy

- 22.4 The National Policy Statements (NPS) are the principal decision-making documents for Nationally Important Infrastructure Projects (NSIPs), those relevant to the Project are listed in **Table 22.1**.

Table 22.1 Salient traffic and transport policy

Policy	Policy requirement	ES reference
NPS for Energy (EN-1), Department for Energy Security and Net Zero (DESNZ) (2023)	Paragraph 5.14.5 of EN-1 outlines that: If a project is likely to have significant transport implications, the applicants ES should include a transport appraisal.	This document presents the initial transport appraisal and approach to securing further detailed assessment (if required).
	Paragraph 5.14.6 of EN-1 outlines that: Applicants should consult National Highways and Highways Authorities as appropriate on the assessment and mitigation.	Section 22.4.3 confirms that the approach to assessment outlined in this chapter has been agreed with National Highways and Lancashire County Council.
	Paragraph 5.14.7 of EN-1 outlines that: The applicants should prepare a travel plan including demand	Section 22.6 outlines the proposed approach to managing potential effects.

Policy	Policy requirement	ES reference
	management and monitoring measures to mitigate transport impacts. The applicants should also provide details of proposed measures to improve access by active, public and shared transport.	
	Paragraph 5.14.8 of EN-1 outlines that: The assessment should also consider any possible disruption to services and infrastructure (such as road, rail and airports).	Section 22.6 outlines the proposed approach to managing potential effects.

22.5 Should further detailed assessment be determined, this would align with local transport policies' expectations.

22.3 Background and consultation

22.6 Consultation with regard to traffic and transport has been undertaken in line with the general process described in **Chapter 6 EIA Methodology** (Document Reference 5.1.6). The key elements to date have included Scoping (Scoping Opinion from the Planning Inspectorate (PINS) received on 2nd August 2022), comments received on the Preliminary Environmental Impact Assessment (PEIR) which was published for statutory consultation in April – June 2023, and further targeted consultation.

22.7 The feedback received throughout this consultation process has been considered in preparing the ES. The key elements to date pertinent to traffic and transport are outlined below, whilst **Section 22.5** and **Section 22.6** provide details of how the Project team has had regard to the comments and how these have been addressed.

22.8 The consultation process is described further in **Chapter 6 EIA Methodology**. Full details of the consultation undertaken throughout the environmental impact assessment (EIA) process are presented in the Consultation Report (Document Reference 4.1) submitted as part of the DCO Application.

22.9 Section 8.19 of the Scoping Report (Morecambe Offshore Windfarm Ltd, 2022) outlined a proposed approach to scope out of the EIA the potential traffic and transport impact (and associated air, noise, socio-economics and human health impacts) associated with the offshore generation assets, and instead considering them separately within a Port Access and Transport Plan (PATP). An Outline has been provided as part of the DCO Application (Document Reference 6.7).

22.10 In response, PINS Scoping Opinion outlined that:

“... No information is presented in the Scoping Report about the likely routing of vehicles, location of receptors or predicted traffic movements arising from the Proposed Development, although section 8.15 describes that the vast bulk of material will arrive by ship at a loadout port. On the basis of information presented in the Scoping Report, the Inspectorate considers that it is unlikely that the volume of traffic movements arising from the Proposed Development would result in significant onshore traffic, air quality and/or noise effects but does not have sufficient information to exclude this possibility. The [Environmental Statement] ES should confirm that the anticipated road vehicle movements are below the screening values in relevant guidance for these aspects, and if values are exceeded then an assessment of [likely significant effects] LSE should be provided.”

22.11 In response to the PEIR, Westmorland and Furness Council (WMFC) outlined that:

“There does not appear to have been an assessment of the onshore transport movements and potential impacts associated with construction of the offshore components of the Project. Quarried rock and other construction materials will be needed in large quantities and if sourced from local suppliers would need to be transported by road or rail to a suitable port, potentially Barrow. This could have significant impacts upon local roads, but has not been assessed.

Whilst experience with previous offshore windfarms has not resulted in such impacts upon Westmorland and Furness, without clarity on where large volumes of construction materials will be sourced, it cannot be ruled out. Provision was made in the Walney Extension Development Consent Order for managing potential impacts relating to transport of materials to port and this should be considered for Morecambe and Morgan.”

22.4 Scope

22.12 Noting PINS' Scoping Opinion comments and the PEIR comments from WMFC, the following sections provide further rationale for the scoping out of Project traffic and transport impacts at the application stage (**Section 22.5**), followed by a proposed approach to securing the assessment and management of potential effects post DCO determination (**Section 22.6**).

22.5 Rationale

22.13 The preferred base port(s) for offshore construction, operation and maintenance, and decommissioning of the Project is not known and any decision would not be made until post-consent. In particular, the Scoping Report identified that:

- *“turbines, foundations, substations and electrical infrastructure will be fabricated offsite, marshalled and assembled at a suitable port facility and transported to site as required. Fabrication contracts have not been placed and the Applicant will run competitive tendering processes to identify the most suitable contractors to deliver the required elements of the Project. Fabrication can take place in the United Kingdom (UK), in Europe or elsewhere dependent upon the location of the chosen contractor”;* and
- *“The Operation and Maintenance (O&M) strategy will be finalised based on the location of a suitable port/harbour which is yet to be defined...”*

22.14 Any attempt to assume or identify a potential port location (either in the UK or Continental Europe) could compromise the commercial negotiations.

22.15 Subject to granting of the DCO consent and Project financing, the following approach to the selection of a port(s) for the respective phases of the Project is proposed.

22.4.1 Construction (and decommissioning)

22.16 The Applicant would implement a tender process to identify and appoint the most suitable contractors to deliver the required elements of the Project. This tender process would include the selection of a preferred port(s) which either has existing planning permissions or permitted development rights.

22.17 In the UK, Government initiatives (such as Free Ports (UK Government, 2022)) are also leading to the establishment of a number of ‘Green Ports’, with facilities aimed at the supporting the offshore wind sector. The tender process could potentially include Green Ports to service the Project.

22.4.2 Operation and maintenance

22.18 The Applicant proposes to undertake a review to identify the most suitable port(s) to maintain and operate the Project. This process would identify if the preferred port(s) have existing permissions (e.g., a green port windfarm hub) or permitted development rights. For example, the movement of employees, servicing, import of materials/components by road/rail would be permitted, as would the export of components by sea. If the review identifies that new permissions may be required, these would be sought from the respective planning authority at the time.

22.4.3 Summary

- 22.19 It is the Applicant's position that it is not possible to confirm which port(s) would be used for each of the Project phases until post-consent and therefore no further meaningful assessment of traffic and transport impacts can be presented at this stage. Furthermore, as outlined in **Section 22.5**, any attempt to assume or identify a location could compromise commercial negotiations.
- 22.20 This approach to scoping out the onshore traffic and transport impacts of offshore construction, operation and maintenance and decommissioning has been accepted by PINS for other recently consented offshore windfarm projects, including Norfolk Boreas, Norfolk Vanguard, Hornsea Three and Four, East Anglia TWO and East Anglia ONE North and Walney Extension.
- 22.21 The proposed approach has been discussed and agreed with both National Highways and Lancashire County Council Highways at a meeting on the 16th March 2023.

22.6 Proposed approach to managing potential effects

- 22.22 The Applicant acknowledges the advice of PINS that: *"the ES should confirm that the anticipated road vehicle movements are below the screening values in relevant guidance for these aspects, and if values are exceeded then an assessment of likely significant effects (LSE) should be provided"*.
- 22.23 However, noting the Applicant's position outlined in **Section 22.5**, it is asserted that any meaningful screening and robust assessment of LSE would not be possible at this stage and would represent a purely 'academic' exercise. Any such assessment would be contrary to the approach accepted by PINS for other recently consented windfarm schemes and also contrary to PINS advice (advice note 7) that states the EIA process should be proportionate and demonstrate information is sufficient to enable a reasoned conclusion to be reached.
- 22.24 To secure the future assessment of any potential terrestrial traffic and transport impacts, the Applicant has committed to developing a PATP post-consent in the event that the chosen port does not have sufficient extant permissions to supply the Project.
- 22.25 In support of this DCO Application, the Applicant has produced an Outline PATP (Document Reference 6.7). The purpose of the Outline PATP is to capture a framework of measures and commitments to be implemented, should the need for a final PATP be established. In addition, the Outline PATP details the processes to be followed once the port(s) have been identified, to include:
- Stakeholder consultation
 - Review of supply chain extant port permissions
 - Assessing potential residual impacts

- Assessing potential cumulative impacts
 - Securing a finalised suite of measures
- 22.26 The requirement to produce a final PATP would be agreed in consultation with the relevant planning authority once the selected port(s) are known (e.g., if it is established that the preferred port(s) for the construction phase require new permission to service the Project).
- 22.27 The draft DCO includes a requirement to confirm if a PATP is required and, if required, the PATP, which must be in accordance with this Outline PATP, is to be submitted to and approved by the relevant highway authority in consultation with the relevant planning authority.
- 22.28 The final PATP would be specific to the port(s) selected and would provide details of the existing port permissions, forecast construction and operational traffic demand, and related effects associated with these phases of the Project. The final PATP would also include an evaluation of relevant national and local policy, potential traffic and transport effects (including cumulative effects) associated with construction and operational and maintenance movements.

22.7 References

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