



MORGAN AND MORECAMBE OFFSHORE WIND FARMS: TRANSMISSION ASSETS

Consultation Report



September 2024
Rev: F01

MOR001-FLO-CON-ENV-RPD-0118
MRCNS-J3303-RPS-10037

PINS Reference: EN020028
APFP Regulations: 5(2)(q)
Document reference: E1

Document status					
Version	Purpose of document	Approved by	Date	Approved by	Date
F01	For issue	AS	July 2024	IM	September 2024

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Morecambe Offshore Windfarm Ltd**

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Glossary

Term	Meaning
400 kV grid connection cables	Cables that will connect the proposed onshore substations to the existing National Grid Penwortham substation.
400 kV grid connection cable corridor	The corridor within which the 400 kV grid connection cables will be located.
Applicants	Morgan Offshore Wind Limited (Morgan OWL) and Morecambe Offshore Windfarm Ltd (Morecambe OWL).
Climate change	A change in global or regional climate patterns, in particular a change apparent from the mid to late 20th century onwards and attributed largely to the increased levels of atmospheric carbon dioxide produced by the use of fossil fuels.
Development Consent Order	An order made under the Planning Act 2008, as amended, granting development consent.
EIA Scoping Report	A report setting out the proposed scope of the Environmental Impact Assessment process. The Transmission Assets Scoping Report was submitted to The Planning Inspectorate (on behalf of the Secretary of State) for the Morgan and Morecambe Offshore Windfarms Transmission Assets in October 2022.
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.
Expert Working Group	A forum for targeted engagement with regulators and interested stakeholders through the Evidence Plan process.
Export cable corridor	The specific corridor of seabed (seaward of Mean High Water Springs and land (landward of Mean High Water Springs) from the Generation Assets to the National Grid Penwortham substation.
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.
Habitats Regulations	The Conservation of Habitats and Species Regulations 2017 (as amended) and the Conservation of Offshore Marine Habitats and Species Regulations 2017 (as amended).
Intertidal area	The area between Mean High Water Springs and Mean Low Water Springs.

Term	Meaning
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 bays 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 Planning Authority	The local government body (e.g., Borough Council, District Council, etc.) responsible for determining planning applications within a specific area.
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.
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.
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 a joint venture between Zero-E Offshore Wind S.L.U. (Spain) (a Cobra group company) (Cobra) and Flotation Energy Ltd
Morgan and Morecambe Offshore Wind Farms: Transmission Assets	The offshore and onshore infrastructure connecting the Morgan Offshore Wind Project and the Morecambe Offshore Windfarm to the national grid. This includes the offshore export cables, landfall site, onshore export cables, onshore substations, 400 kV grid connection 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.
Morgan OWL	Morgan Offshore Wind Limited is a joint venture between bp Alternative Energy investments Ltd. and Energie Baden-Württemberg AG (EnBW).
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 Security and Net Zero in 2023 and adopted in 2024.

Term	Meaning
Non-statutory consultee	Organisations that an applicant may choose to consult in relation to a project who are not designated in law but are likely to have an interest in the project.
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 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 Wind Leading Round 4	The Crown Estate auction process which allocated developers preferred bidder status on areas of the seabed within Welsh and English waters and ends when the Agreements for Lease are signed.
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 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 and to adjust the power quality and power factor, as required to meet the UK Grid Code for supply to the National Grid.
Order limits	The limits within which the Transmission Assets may be carried out.
Planning Inspectorate	The agency responsible for operating the planning process for applications for development consent under the Planning Act 2008.
Point of Interconnection	The point where an offshore wind farm connects to the National Grid.
Policy	A set of decisions by governments and other political actors to influence, change, or frame a problem or issue that has been recognized as in the political realm by policy makers and/or the wider public.
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.
Scoping Opinion	Sets out the Planning Inspectorate's response (on behalf of the Secretary of State) to the Scoping Report prepared by the Applicants. The Scoping Opinion contains the range of issues that the Planning Inspectorate, in consultation with statutory stakeholders, has identified should be considered within the Environmental Impact Assessment process.
Statutory consultee	Organisations that are required to be consulted by an applicant pursuant to section 42 of the Planning Act 2008 in relation to an application for development consent. Not all consultees will be statutory consultees (see non-statutory consultee definition).

Term	Meaning
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.
Transboundary effects	Effects from a project within one state that affect the environment of another state(s).
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
Transmission Assets Scoping Boundary	The term used to define the boundary used at the time the Scoping Report was submitted.

Acronyms

Acronym	Meaning
ADDs	Acoustic Deterrent Devices
ADS	Archaeology Data Service
AFBI	Agri-food and Biosciences Institute
AHEF	Archaeology and Heritage Engagement Forum
ALO	Agricultural Liaison Officer
APFP	Applications, Prescribed Forms and Procedures
BAOL	Blackpool Airport Operations Ltd
BMV	Best and Most Versatile
CAA	Civil Aviation Authority
CBRA	Cable Burial Risk Assessment
CCS	Carbon Capture and Storage
Cefas	Centre for Environment, Fisheries and Aquaculture Science
CoCP	Code of Construction Practice
CRNRA	Cumulative Regional Navigation Risk Assessment
DAERA	Department of Agriculture, Environment and Rural Affairs
DCO	Development Consent Order
DCLG	The former Department of Communities and Local Government
DESNZ	The Department for Energy Security and Net Zero
ECoW	Ecological Clerk of Works

Acronym	Meaning
EDRs	Effective Deterrence Ranges
EEA	European Economic Area
EIA	Environmental Impact Assessment
EMF	Electromagnetic fields
EnBW	Energie Baden-Württemberg AG
EPP	Evidence Plan Process
ES	Environmental Statement
ESO	Electricity System Operator
EWG	Expert Working Group
FLL	Functionally Linked Land
GDPR	General Data Protection Regulations
HDD	Horizontal Directional Drilling
HSC	Historic Seascape Character
HMLR	His Majesty's Land Registry
HND	Holistic Network Design
HNDR	Holistic Network Design Review
HRA	Habitats Regulation Assessment
ICNIRP	International Commission on Non-ionizing Radiation Protection
INNS	Invasive non-native species
IFCA	Inshore Fisheries and Conservation Authority
ISAA	Information to Support Appropriate Assessment
JNCC	Joint Nature Conservation Committee
LEP	Local Enterprise Partnership
LIQ	Land Interest Questionnaire
LNR	Local Nature Reserve
LOQ	Landowner Questionnaire
LPA	Local Planning Authority
LSE	Likely Significant Effects
MCA	Maritime and Coastguard Agency
MCZ	Marine Conservation Zone
MDS	Maximum Design Scenario
MLC	Members of the Legislative Council
MLWS	Mean Low Water Springs

Acronym	Meaning
MMO	Marine Management Organisation
MMMP	Marine Mammal Mitigation Protocols
MNEF	Maritime Navigation Engagement Forum
MP	Member of Parliament
MS	Members of the Senedd
NCR	National Cycle Routes
NFFO	National Federation of Fishermen's Organisation
NGESO	National Grid Electricity System Operator
NHV	Noordzee Helikopters Vlaanderen
NNR	National Nature Reserve
NPS	National Policy Statement
NRA	Navigational Risk Assessment
NRW	Natural Resource Wales
NSIP	Nationally Significant Infrastructure Project
NTS	Non-technical Summary
NVC	National Vegetation Classification
NWIFCA	North Western Inshore Fisheries and Conservation Authority
OCoCP	Outline Code of Construction Practice
OCTMP	Outline Construction Traffic Management Plan
OEMP	Outline Ecological Management Plan
OOWSI	Outline Offshore Written Scheme of Investigation
OSP	Offshore Substation Platform
OTNR	Offshore Transmission Network Review
PADs	Protocols for Archaeological Discoveries
PDE	Project Design Envelope
PEIR	Preliminary Environmental Information Report
PRoW	Public Rights of Way
PSR	Primary Surveillance Radar
PWIL	Persons with an interest in land
RSPB	Royal Society for the Protection of Birds
SAC	Special Area of Conservation
SHG	Seldom heard groups
SNCB	Statutory Nature Conservation Bodies

Acronym	Meaning
SoCC	Statement of Community Consultation
SPA	Special Protection Area
SPZ	Source Protection Zone
SRBC	South Ribble Borough Council
SSSI	Site of Special Scientific Interest
TCE	The Crown Estate
TEP	Technical Engagement Plan
TSC	Territorial Seas Committee
UK	United Kingdom
UXO	Unexploded Ordnance
VMS	Vessel Monitoring System
WSI	Written Scheme of Investigation

Units

Unit	Description
%	Percentage
kV	Kilovolts
GW	Gigawatts
MW	Megawatts
m	Meters
dB	Decibel

Executive summary

Introduction

- E.1.1.1 This Consultation Report has been prepared for the Morgan and Morecambe Offshore Wind Farms: Transmission Assets (hereafter referred to as ‘the Transmission Assets’).

The Morgan Offshore Wind Project and the Morecambe Offshore Windfarm

- E.1.1.2 Morgan Offshore Wind Limited (Morgan OWL), a joint venture between bp Alternative Energy Investments Ltd. (bp) and Energie Baden-Württemberg AG (EnBW), is developing the Morgan Offshore Wind Project. The Morgan Offshore Wind Project is a proposed offshore wind farm in the east Irish Sea.
- E.1.1.3 Morecambe Offshore Windfarm Ltd (Morecambe OWL), a joint venture between Zero-E Offshore Wind S.L.U. (Spain) (a Cobra group company), (Cobra) and Flotation Energy Ltd, is developing the Morecambe Offshore Windfarm, also located in the east Irish Sea.
- E.1.1.4 Both offshore wind farms will have a capacity of over 100 megawatts (MW) and are located wholly in English waters. They are therefore Nationally Significant Infrastructure Projects (NSIPs) under the Planning Act 2008, as amended (referred to here as ‘the Planning Act 2008’).

Overview of the Transmission Assets

- E.1.1.5 Morgan OWL and Morecambe OWL (the Applicants) are jointly seeking a single consent for transmission assets comprising aligned offshore export cable corridors to landfall and aligned onshore export cable corridors to onshore substations (and associated infrastructure) and onward connection to the National Grid at Penwortham, Lancashire.
- E.1.1.6 Following a request from the Applicants, on 4 October 2022, the Secretary of State issued a direction under section 35 of the Planning Act 2008 that the Transmission Assets should be treated as a ‘development for which development consent is required.’
- E.1.1.7 This Consultation Report accompanies an application for a single Development Consent Order (DCO) that would give consent to two electrically separate sets of transmission works.

Approach to consultation

- E.1.1.8 From the outset, the Applicants have been committed to a consultation process underpinned by an ethos of being open, transparent, constructive, collaborative, and solutions-focused. Consulting with people living near to the Transmission Assets who may be affected is an important part of the consenting and engagement process and all consultation activity has been designed to be accessible to all. Key materials, advertisements and

personnel have also been available throughout the consultation process., to provide information and manage queries.

E.1.1.9

This Consultation Report has been prepared in accordance with the Planning Act 2008. It presents and summarises the consultation activities conducted during the pre-application stage for the Transmission Assets. It details all aspects of the consultation process, covering both non-statutory and statutory stages, as prescribed by sections 42, 47, 48 and 49 of the Planning Act 2008.

- Section 42: In accordance with its duty to consult under section 42 of the Planning Act 2008, the Applicants have consulted with prescribed bodies, local authorities, landowners and persons with an interest in land (PWILs) to ensure that they have had an opportunity to review and comment. The full list of prescribed consultees can be viewed at Annex E1.9.1 (document reference E1.9). **Section 4.2** of this report explains in detail how the Applicants have consulted with those groups and individuals. As required by section 46 of the Planning Act 2008, the Applicants notified the Secretary of State of the proposed application and provided copies of the relevant consultation materials at the same time as section 42 consultees (see **section 4.4** of this report).
- Section 47: As required by section 47 of the Planning Act 2008, the Applicants conducted statutory consultation to engage section 47 consultees early in the development of the Transmission Assets. A Statement of Community Consultation (SoCC) was prepared (see Annex E1.6.1, document reference E1.6) outlining the approach to community consultation. A draft SoCC (Annex E.1.6.2, document reference E1.6) was shared with relevant local authorities, for comment ahead of finalisation and publication.. The approach outlined in the SoCC was subsequently implemented, as outlined in **section 4.1** of this report. A section 47 consultee list was produced by the Applicants by identifying interested individuals, organisations and community groups within the areas likely to be impacted by the Transmission Assets. This list is provided at Annex E1.7.1 (document reference E1.7).
- Section 48: Section 48 of the Planning Act 2008 requires the Applicants to publicise a proposed application at the pre-application stage, in the prescribed manner, and to include a deadline for receipt of responses. The Applicants publicised the application in the prescribed manner. All publicity methods used by the Applicants during statutory consultation are outlined in **section 4.5.3** of this report.
- Section 49: In addition to carrying out its consultation activities as prescribed by sections 42, 47 and 48 of the Planning Act 2008, as detailed above, section 49 requires that the Consultation Report should give details of the account taken of any responses provided to its consultation activities. This report provides this information in **section 4.7**.

E.1.1.10

As the basis for its statutory consultation, the Applicants prepared a Preliminary Environmental Information Report (PEIR) and provided supporting documents to assist consultees in forming an informed

perspective on the potential environmental impacts of the Project. A non-technical summary (NTS) of the PEIR was also made available. The Applicants reviewed all feedback received during the statutory consultation and considered opportunities to incorporate information or comments received into the final design presented as part of the application for development consent (see **section 4.7** of this report).

Design refinements

E.1.1.11 The design refinements made since the statutory consultation stage, including those made as a result of feedback received during the statutory consultation, are set out in **section 4.7.3** and **Table 4.12** of this report and can be summarised as follows.

- Removal of the Morgan offshore booster station from the Transmission Assets' design, as further work has identified that this is not required.
- Removal of the offshore substation platforms (OSPs) and interconnector cables between the OSPs from the application for the Transmission Assets. This avoids duplication with the applications for the Morgan Offshore Wind Project: Generation Assets and the Morecambe Offshore Windfarm: Generation Assets (referred to as 'the Generation Assets'). The OSPs still form part of the applications for the Generation Assets.
- The Transmission Assets Offshore Order Limits have been aligned with the Morecambe Offshore Windfarm: Generation Assets order limits to remove the western portion of the Morecambe Offshore Windfarm: Generation Assets. There has also been a reduction of the north west corner of the Transmission Assets Order Limits to mitigate potential shipping and navigation impacts.
- Removal of the option to install the onshore export cables within roads.
- Refinement of the Onshore export cable corridor to reduce the number of cable route options between the landfall and Penwortham.
- Refinement of both the temporary and permanent Onshore export cable corridor width.
- Refinement of the 400 kV grid connection cable corridor from the search area provided at PEIR to the 400 kV grid connection cable corridor defined by the Transmission Assets Order Limits.
- Selection of substation sites, including:
 - selection of a single site for the Onshore substation for the Morecambe Offshore Windfarm: Transmission Assets; and
 - refinement of the siting and orientation of the Onshore substation for the Morgan Offshore Wind Project: Transmission Assets..
- Selection of a preferred technology for the Onshore substation for the Morgan Offshore Wind Project: Transmission Assets to use gas insulated switchgear.

- Refinement of installation methodologies at the landfall and the River Ribble.
- Refinement of the locations for the use of horizontal directional drilling (or other technologies).
- Refinement of biodiversity benefit and mitigation areas.

E.1.1.12 These changes and refinements are reflected in the Transmission Assets Order Limits, which cover a reduced area compared to the red line boundary presented within the PEIR.

Consultation Report

E.1.1.13 This Consultation Report presents and summarises feedback from stakeholders throughout all stages of consultation and explains how the Applicants have given consideration to this within their decision-making to date. Additionally, the report sets out the community and stakeholder engagement activity that continued beyond the feedback consideration cut-off date. In summary, the Consultation Report details how the Applicants have engaged with consultees at each of the following stages during the development of the Transmission Assets, as set out below.

- Pre-scoping: the initial period of engagement to introduce the Project and prepare for scoping.
- Scoping: the process of preparing the Environmental Impact Assessment (EIA) Scoping Report, submitting to the Planning Inspectorate and receiving a Scoping Opinion from the former Department of Business, Energy and Industrial Strategy.
- Post-scoping and pre-PEIR: discussion of scoping responses and initial engagement with the local community, including two phases of non-statutory consultation, consultation on the draft SoCC, preparation for statutory consultation and PEIR publication, and seeking feedback on how the Applicants intended to engage.
- Statutory consultation: the statutory consultation period as required by the Planning Act 2008, including additional targeted statutory consultations undertaken.
- Post-PEIR and pre-application engagement: the review of statutory consultation responses from key stakeholders, post-statutory consultation engagement with technical stakeholders to inform them of design changes, and pre-application engagement with relevant stakeholders to discuss outstanding issues and next steps.

E.1.1.14 The Applicants have ensured that this document aligns with the recommended structure and content for a consultation report and provides a detailed account of all pre-application stage consultation and stakeholder engagement activities related to the Transmission Assets.

E.1.1.15 This is in accordance with the Planning Inspectorate's guidelines and those set out by the former Department of Communities and Local Government

(DCLG) (now the Department for Levelling Up, Housing and Communities)
(DCLG, 2015).

1 Introduction

1.1 Overview and purpose of the Consultation Report

- 1.1.1.1 This Consultation Report has been written on behalf of the Morgan and Morecambe Offshore Wind Farms: Transmission Assets (hereafter referred to as ‘the Transmission Assets’), in support of the application for development consent under the Planning Act 2008, as amended (referred to here as ‘the Planning Act 2008’).
- 1.1.1.2 The report provides a summary of consultation activity undertaken as part of the pre-application stage for the Transmission Assets and describes the consultation process that the Applicants have followed both in terms of the non-statutory and statutory consultation and publicity stages, as required under sections 42, 47 and 48 of the Planning Act 2008. It outlines the feedback received and explains how the feedback has been taken into consideration by the Applicants (as required under section 49 of the Planning Act 2008).
- 1.1.1.3 Additionally, the report contains details of stakeholder engagement activities that have been conducted, and are continuing, throughout the refinement of the design of the Transmission Assets. All feedback received has been referenced up to as close to the submission of the application as possible, including feedback from additional targeted statutory consultations (see **section 4.3** of this report).
- 1.1.1.4 This Consultation Report has been prepared following the guidance provided by the Planning Inspectorate in Advice Note 14: Compiling the consultation report (Planning Inspectorate, 2021) and Advice Note 6: Preparation and submission of application documents (Planning Inspectorate, 2012).
- 1.1.1.5 Consistent with the recommendations presented in Advice Note 14, this document offers a comprehensive summary of consultation and stakeholder engagement undertaken at the pre-application stage in relation to the Transmission Assets.
- 1.1.1.6 The Applicants are aware that new guidance was introduced in April 2024 and Advice Note 14 has also been updated. However, as explained in **section 2.2.2**, of this report, the transitional provisions contained in the new guidance apply to this report. Therefore, this report adheres to guidelines set out by DCLG (DCLG, 2015) for major infrastructure projects. In particular, paragraph 80 stipulates that the consultation report should:
- provide a general description of the consultation process undertaken, which can helpfully include a timeline (see **section 1.5** of this report);
 - set out specifically what the Applicants have done in compliance with the requirements of the Planning Act 2008, relevant secondary legislation, this guidance, and any relevant policies, guidance or advice published by Government or the Planning Inspectorate (see Annex E1.2.1, document reference E1.2);

- set out how the Applicants have taken account of any response to consultation with local authorities on what should be in the Applicants' SoCC (see **section 4.1.3** of this report);
- set out a summary of relevant responses to consultation (but not a complete list of responses) (see **section 4.7** of this report);
- provide a description of how the application was informed and influenced by those responses, outlining any changes made as a result and showing how significant relevant responses will be addressed (see **section 4.7** of this report); and
- be expressed in terms sufficient to enable the Secretary of State to understand fully how the consultation process has been undertaken and significant effects addressed.

1.1.1.7 More detail on how this report gives regard to the relevant legislation, guidance and advice is given in **section 2** of this report.

1.2 Structure of the Consultation Report

1.2.1.1 In accordance with Advice Note 14 (Planning Inspectorate, 2021), this Consultation Report describes the consultation process carried out by the Applicants prior to submission of the application. Whilst the Advice Note does not issue prescriptive instructions, it does provide useful guidance, which this report follows in terms of the main format and structure. The structure of this Consultation Report is as follows.

- Executive summary.
- Introduction.
- Legislation, policy and guidance (**section 2** of this report).
- Non-statutory consultation and engagement (**section 3** of this report).
- Statutory consultation:
 - the Statement of Community Consultation (SoCC) and consultation under section 47 of the Planning Act 2008 (**section 4.1** of this report);
 - consultation under section 42 of the Planning Act 2008 (**section 4.2** of this report);
 - additional targeted statutory consultation (**section 4.3** of this report);
 - notifying the Secretary of State under section 46 of the Planning Act 2008 (**section 4.4** of this report);
 - statutory publicity under section 48 of the Planning Act 2008 (**section 4.5** of this report);
 - consultation under the 2017 EIA and Habitats Regulations (**section 4.6** of this report); and
 - summary of responses to statutory consultation and the Applicants' regard (section 49 of the Planning Act 2008) (**section 4.7** of this report).

- Post-statutory consultation engagement (**section 4.8** of this report).
- Conclusions (**section 5** of this report).
- Report annexes.

1.2.1.2 The Consultation Report is a standalone document but should be read in conjunction with other application materials, where applicable.

1.2.1.3 The annexes to this report provide evidence to accompany this report and demonstrate compliance with the requirements of the Planning Act 2008. A list of annexes is provided in **Table 1.1** below.

Table 1.1: Consultation Report annexes

Relevant section of the Consultation Report	Annex title	Annex number	Annex sub-number	Context
Section 1	Annex E1.1: Consultation approach	E1.1.1	N/A	Summary of coordinated consultation methods, locations and projects represented
Section 2	Annex E1: Consultation compliance checklist	E1.2.1	N/A	Consultation compliance checklist
Section 3	Annex E1.3: Non-statutory consultation 2 November - 13 December 2022	E1.3.1	N/A	Early engagement – written communication to stakeholders
			E1.3.1.1	Morgan and Mona Offshore Wind Projects written communication to stakeholders July 2021
			E1.3.1.2	Morecambe Offshore Windfarm written communication to stakeholders October 2021
		E1.3.2	N/A	Postcards
			E1.3.2.1	North-west England
			E1.3.2.2	Isle of Man
		E1.3.3	N/A	Poster
		E1.3.4	N/A	Printed advertisements
			E1.3.4.1	Lancashire Evening Post 2 November 2022
			E1.3.4.2	Daily Post 2 November 2022
		E1.3.5	N/A	Media release, outlet list and media coverage:
			E1.3.5.1	Media release
			E1.3.5.2	Media release outlet list
E1.3.5.3	Media coverage: Energy FM			
E1.3.5.4	Media coverage: North Lancashire’s Beyond Radio			

Relevant section of the Consultation Report	Annex title	Annex number	Annex sub-number	Context
			E1.3.5.5	Media coverage: Lancashire Evening Post
			E1.3.5.6	Media coverage: BBC News
			E1.3.5.7	Media coverage: Isle of Man Today
		E1.3.6	N/A	Stakeholder email and distribution list
			E1.3.6.1	Stakeholder email 2 November 2022
			E1.3.6.2	Stakeholder email 2 November 2022 distribution list
		E1.3.7	N/A	Seldom Heard Groups
			E1.3.7.1	Seldom Heard Groups email
			E1.3.7.2	Seldom Heard Groups email distribution list
		E1.3.8	N/A	Social media
			E1.3.8.1	Flotation Energy LinkedIn post 3 November 2022 – Consultation launch
			E1.3.8.2	Flotation Energy LinkedIn post 8 November 2022 – Webinar invitation
			E1.3.8.3	Flotation Energy LinkedIn post 18 November 2022 – Morecambe consultation events
			E1.3.8.4	Flotation Energy LinkedIn Post 22 November 2022 – Morecambe consultation events
E1.3.9	N/A	Consultation brochure		
E1.3.10	N/A	Feedback form		
E1.3.11	N/A	Joint website screenshots		
E1.3.12	N/A	Wobble board		

Relevant section of the Consultation Report	Annex title	Annex number	Annex sub-number	Context	
		E1.3.13	N/A	Event panels and map	
		E1.3.14	N/A	Webinar presentation 10 November 2022	
	Annex E1.4: Non-statutory consultation 19 April - 4 June 2023	E1.4.1	N/A	N/A	Poster cover letters, poster and distribution list
			E1.4.1.1		Poster cover letter: North West England
			E1.4.1.2		Poster cover letter: Isle of Man
			E1.4.1.3		Poster
			E1.4.1.4		Poster distribution list
		E1.4.2	N/A		Postcard
		E1.4.3	N/A	N/A	Media releases and publication list
			E1.4.3.1		Media release 19 April 2023
			E1.4.3.2		Media release 23 May 2023
			E1.4.3.2		Media release publication list
		E1.4.4	N/A	N/A	Print newspaper adverts: Consultation launch
			E1.4.4.1		Blackpool Gazette 19 April 2023
			E1.4.4.2		Lancashire Evening Post 19 April 2023
			E1.4.4.3		Daily Post 19 April 2023
			E1.4.4.4		Liverpool Echo 19 April 2023
E1.4.4.5			Golwg 20 April 2023		
E1.4.4.6		Isle of Man Courier 21 April 2023			
E1.4.5	N/A		Print newspaper adverts – Consultation close		

Relevant section of the Consultation Report	Annex title	Annex number	Annex sub-number	Context
			E1.4.5.1	Golwg 11 May 2023
			E1.4.5.2	Isle of Man Courier 12 May 2023
			E1.4.5.3	Blackpool Gazette 15 May 2023
			E1.4.5.4	Lancashire Evening Post 15 May 2023
			E1.4.5.5	Daily Post 17 May 2023
			E1.4.5.6	Liverpool Echo 17 May 2023
		E1.4.6	N/A	Digital artwork and example digital advert
			E1.4.6.1	Consultation launch artwork
			E1.4.6.2	Consultation close artwork
			E1.4.6.3	Example digital advert: - Liverpool Echo 17 May – 4 June 2023
		E1.4.7	N/A	Email communications
			E1.4.7.1	Consultation launch email
			E1.4.7.2	Consultation launch email distribution list
		E1.4.8	N/A	Social Media
			E1.4.8.1	bp Facebook post: Consultation launch
			E1.4.8.2	Flotation Energy LinkedIn post: Consultation launch 11 May 2023
			E1.4.8.3	Flotation Energy LinkedIn post: Consultation close 24 May 2023
E1.4.9	N/A	Transmission Assets website		
E1.4.10	N/A	Brochure		

Relevant section of the Consultation Report	Annex title	Annex number	Annex sub-number	Context
		E1.4.11	N/A	Feedback form
		E1.4.12	N/A	Online advertising
			E1.4.12.1	Google advert consultation launch 19 April – 17 May 2023
			E1.4.12.2	Google advert consultation close 17 May – 4 June 2023
			E1.4.12.3	Spotify advert 19 April – 4 June 2023
		E1.4.13	N/A	Consultation reminder email notification
		E1.4.14	N/A	Webinar presentation 23 May 2023
		E1.4.15	N/A	Wobble board
		E1.4.16	N/A	Event panels
			E1.4.16.1	North West England
	E1.4.16.2		Isle of Man	
	E1.4.16.3		All events	
	Annex E1.5: Non-statutory consultation landowner engagement	E1.5.1	N/A	Example cover letter and Landowner Questionnaire
		E1.5.2	N/A	Example site notice and site notice location map
		E1.5.3	N/A	Example of site notice in situ
		E1.5.4	N/A	Example Landowner Questionnaire to adjacent interests (unregistered land)
		E1.5.5	N/A	Example non-intrusive survey access licence
		E1.5.6	N/A	Example letters to Persons with an Interest in the Land during non-statutory consultation 2022

Relevant section of the Consultation Report	Annex title	Annex number	Annex sub-number	Context
			E1.5.6.1	Example letter to Persons with an Interest in the Land 10 November 2022
			E1.5.6.2	Example letter to Persons with an Interest in the Land 19 December 2022
		E1.5.7	N/A	Example letters to Persons with an Interest in the Land during non- statutory consultation 2023
			E1.5.7.1	Example letter to Persons with an Interest in the Land 10 January 2023
			E1.5.7.2	Example letter to Persons with an Interest in the Land 14 February 2023
			E1.5.7.3	Example letter to Persons with an Interest in the Land 18 April 2023
Section 4	Annex E1.6: Section 47 of the Planning Act 2008 - The Statement of Community Consultation	E1.6.1	N/A	Published Statement of Community Consultation 5 October 2023
		E1.6.2	N/A	Draft Statement of Community Consultation
		E1.6.3	N/A	Section 47 statutory newspaper notices
			E1.6.3.1	Blackpool Gazette 5 October 2023
			E1.6.3.2	Lancashire Evening Post 5 October 2023
			E1.6.3.3	Lytham St Annes Express 5 October 2023
		E1.6.3.4	Isle of Man Courier 6 October 2023	
	Annex E1.7: Statutory consultation - section 47 consultee list	E1.7.1	N/A	Statutory consultation - section 47 consultee list
		E1.8.1	N/A	Letter to consultees regarding PEIR Figures 12 October 2023

Relevant section of the Consultation Report	Annex title	Annex number	Annex sub-number	Context
	Annex E1.8: Statutory consultation 12 October – 23 November 2023 (Part 1 of 2)	E1.8.2	N/A	Transmission Assets website
		E1.8.3	N/A	Newsletter
		E1.8.4	N/A	Brochure
		E1.8.5	N/A	Poster cover letter and poster
			E1.8.5.1	Poster cover letter
			E1.8.5.2	Poster
		E1.8.6	N/A	Newspaper print adverts
			E1.8.6.1	Blackpool Gazette 12 October 2023
			E1.8.6.2	Lancashire Evening Post 12 October 2023
			E1.8.6.3	Isle of Man Courier 13 October 2023
			E1.8.6.4	Lytham St Annes Express 19 October 2023
			E1.8.6.5	Isle of Man Courier 10 November 2023
			E1.8.6.6	Blackpool Gazette 13 November 2023
			E1.8.6.7	Lancashire Evening Post 13 November 2023
		E1.8.7	E1.8.6.8	Lytham St Annes Express 16 November 2023
			N/A	Digital adverts
			E1.8.7.1	Consultation launch artwork 12 October – 13 November 2023
			E1.8.7.2	Consultation close artwork 13 November – 23 November 2023
E1.8.7.3	Digital advert example: Isle of Man Today 12 October – 13 November 2023			

Relevant section of the Consultation Report	Annex title	Annex number	Annex sub-number	Context
	Annex E1.8: Statutory consultation 12 October – 23 November 2023 (Part 2 of 2)	E1.8.8	N/A	Media releases and coverage
			E1.8.8.1	Media release: Consultation launch 9 October 2023
			E1.8.8.2	Media release: Consultation launch in situ – bp and EnBW Project website
			E1.8.8.3	Media release: Consultation launch in situ - Flotation Energy website
			E1.8.8.4	Media release: Consultation closing soon 9 November 2023
			E1.8.8.5	Media release: Consultation closing soon in situ – bp and EnBW Project website
			E1.8.8.6	Media coverage: Blackpool Gazette 12 October 2023
			E1.8.8.7	Media coverage: Fylde Council News 12 October 2023
			E1.8.8.8	Media coverage: Lytham St Anne's News 12 October 2023
			E1.8.8.9	Media coverage: Offshore Magazine 12 October 2023
			E1.8.8.10	Media coverage: OGV Energy 12 October 2023
			E1.8.8.11	Media coverage: ReNEWS.biz 12 October 2023
			E1.8.8.12	Media coverage: Windpower Monthly 19 October 2023
			E1.8.8.13	Media coverage: Isle of Man Today 21 October 2023
			E1.8.8.14	Media coverage: Isle of Man Today 23 October 2023
			E1.8.8.15	Media coverage: Blackpool Gazette 2 November 2023
			E1.8.8.16	Media coverage: OGV Energy 10 November 2023
E1.8.8.17	Media coverage: Blackpool Gazette 22 November 2023			

Relevant section of the Consultation Report	Annex title	Annex number	Annex sub-number	Context
		E1.8.9	N/A	Online advertising
			E1.8.9.1	Google
			E1.8.9.2	Spotify
		E1.8.10	N/A	Social Media:
			E1.8.10.1	bp X and Facebook post: Consultation launch
			E1.8.10.2	bp X and Facebook post: Consultation close
			E1.8.10.3	Flotation Energy LinkedIn post: Consultation launch
			E1.8.10.4	Flotation Energy LinkedIn post: Consultation close
		E1.8.11	N/A	Section 47 direct email communications
			E1.8.11.1	Advance email 9 October 2023
			E1.8.11.2	Consultation launch email 12 October 2023
			E1.8.11.3	Consultation closing soon email 21 November 2023
		E1.8.12	N/A	Stakeholder briefings
			E1.8.12.1	7 September 2023 presentation
			E1.8.12.2	13 October 2023 invitation and event panels
			E1.8.12.3	8 November 2023 presentation
			E1.8.12.4	24 January 2024 presentation
		E1.8.13	N/A	In-person consultation events
E1.8.13.1	Event panels			
E1.8.13.2	Images from in-person consultation events			

Relevant section of the Consultation Report	Annex title	Annex number	Annex sub-number	Context
		E1.8.14	N/A	Webinar presentation 6 November 2023
		E1.8.15	N/A	Feedback form
		E1.8.16	N/A	Acknowledgements to submitted feedback
			E1.8.16.1	Auto acknowledgement to submitted feedback: Email
			E1.8.16.2	Acknowledgement to submitted feedback: Letter
			E1.8.16.3	Auto acknowledgment to submitted feedback: Online feedback from
		Annex E1.9: Consultation under section 42 of the Planning Act 2008	E1.9.1	N/A
	E1.9.1.1			Prescribed consultees
	E1.9.1.2			Section 42 consultees, for the purposes of section 42(1)(b)
	E1.9.1.3			Non-prescribed consultees
	E1.9.2		N/A	Section 42 consultee communications
			E1.9.2.1	Advance notice email 6 October 2023
			E1.9.2.2	Consultation launch email 12 October 2023
			E1.9.2.3	Consultation launch letter 12 October 2023
			E1.9.2.4	Consultation closing soon email 21 November 2023
	E1.9.3		N/A	Utility Assets proof of delivery 6 October 2023
	Annex E1.10: Statutory consultation - Landowner engagement under section 44 of the Planning Act 2008	E1.10.1	N/A	DCO Land Referencing Methodology September 2024
		E1.10.2	N/A	Example letter and Land Interest Questionnaires
			E1.10.2.1	Example section 42 letter issued to section 44 Persons with an Interest in the Land

Relevant section of the Consultation Report	Annex title	Annex number	Annex sub-number	Context	
			E1.10.2.2	Landowner Land Interest Questionnaire	
			E1.10.2.3	Major landowner Land Interest Questionnaire	
			E1.10.2.4	Third party interest Land Interest Questionnaire	
			E1.10.2.5	Subsoil interest Land Interest Questionnaire	
	Annex E1.11: Targeted Statutory consultation		E1.11.1	N/A	Newly identified Persons with an Interest in the Land: 24 November to 22 December 2023 – Letter
			E1.11.2	N/A	Refinement of the onshore cable corridor and newly identified Persons with an Interest in the Land 2 23 February to 24 March 2024:
				E1.11.2.1	Example letter sent to Group 1 Consultees
				E1.11.2.2	Supporting information on the proposed minor onshore route amendments
				E1.11.2.3	Overview Map Book
				E1.11.2.4	Detailed Map Book
				E1.11.2.5	EIA Table
				E1.11.2.6	Targeted Hard Copy Feedback Form
				E1.11.2.7	Example letter sent to Group 2 consultees
				E1.11.2.8	Example letter sent to Group 3 consultees
			E1.11.3	N/A	External supplier technical issue: 23 February to 24 March 2024 – Section 47 email notification
E1.11.4	N/A	Newly identified Persons with an Interest in the Land 3: 21 March to 18 April 2024 – Example letter sent to consultees			

Relevant section of the Consultation Report	Annex title	Annex number	Annex sub-number	Context
		E1.11.5	N/A	Newly identified Persons with an Interest in the Land 4: 5 August to 4 September 2024 – Example letter sent to consultees
		E1.11.6	N/A	Newly identified Persons with an Interest in the Land 5: 3 September to 2 October 2024 – Example letter sent to consultees
		E1.11.7	N/A	Newly identified Persons with an Interest in the Land 6: 14 September to 12 October 2024 – Example letter sent to consultees
	Annex E1.12: Duty to notify the Secretary of State under section 46 of the Planning Act 2008	E1.12.1	N/A	Section 46 notification issued to the Planning Inspectorate 11 October 2023
		E1.12.2	N/A	Email receipt confirmation for section 46 notification
		E1.12.3	N/A	Section 46 response from the Planning Inspectorate 11 October 2023
	Annex E1.13: Duty to publicise under section 48 of the Planning Act 2008	E1.13.1	N/A	Section 48 notices:
			E1.13.1.1	The section 48 notice
			E1.13.1.2	Section 48 notice location maps and example of section 48 notice in situ
			E1.13.1.3	Fleetwood Weekly News 11 October 2023
			E1.13.1.4	Blackpool Gazette 12 October 2023
			E1.13.1.5	Lancashire Evening Post 12 October 2023
			E1.13.1.6	Lytham St Anne's Express 12 October 2023
E1.13.1.7			Isle of Man Courier 13 October 2023	
E1.13.1.8	Fleetwood Weekly News 18 October 2023			

Relevant section of the Consultation Report	Annex title	Annex number	Annex sub-number	Context
			E1.13.1.9	Blackpool Gazette 19 October 2023
			E1.13.1.10	Lancashire Evening Post 19 October 202
			E1.13.1.11	Lytham St Anne's Express 19 October 2023
			E1.13.1.12	London Gazette 19 October 2023
			E1.13.1.13	The Guardian 19 October 2023
			E1.13.1.14	Fishing News 19 October 2023
			E1.13.1.15	Lloyd's List 19 October 2023
			E1.13.1.16	Isle of Man Courier 20 October 2023
	Annex E1.14: Consultation under the Infrastructure Planning (Environmental Impact Assessment Regulations) 2017	E1.14.1	N/A	Regulation 8 (1)(b) letter 25 October 2022
		E1.14.2	N/A	Regulation 11 list
	Annex E1.15: Planning Inspectorate Regulation 32 transboundary consultation	E1.15.1	N/A	Planning Inspectorate Regulation 32 consultation notification 20 September 2023
		E1.15.2	N/A	Planning Inspectorate Regulation 32 transboundary screening 20 September 2023
		E1.15.3	N/A	Planning Inspectorate Regulation 32 Notice London Gazette 5 October 2023
		E1.15.4	N/A	Regulation 32 Belgium response to the Planning Inspectorate 29 September 2023
		E1.15.5	N/A	Regulation 32 Republic of Ireland response to the Planning Inspectorate 1 November 2023
		E1.16.1	N/A	Section 47 consultee response themes

Relevant section of the Consultation Report	Annex title	Annex number	Annex sub-number	Context
	Annex E1.16: Statutory consultation summary of responses and Applicants' regard	E1.16.2	N/A	Overarching consultation process and non-technical comments table of responses
			E1.16.2.1	Overarching consultation process and non-technical comments table of responses (via feedback form)
			E1.16.2.2	Overarching consultation process and non-technical comments table of responses (via all other methods)
		E1.16.3	N/A	Policy and legislation table of responses
			E1.16.3.1	Policy and legislation table of responses (via feedback form)
			E1.16.3.2	Policy and legislation tables of responses (via all other methods)
		E1.16.4	N/A	Project description table of responses
			E1.16.4.1	Project description table of responses (via feedback form)
			E1.16.4.2	Project description table of responses (via all other methods)
		E1.16.5	N/A	Site selection and consideration of alternatives table of responses
			E1.16.5.1	Site selection and consideration of alternatives table of responses (via feedback from)
			E1.16.5.2	Site selection and consideration of alternatives table of responses (via all other methods)
		E1.16.6	N/A	Environmental Impact Assessment methodology table of responses (via all methods)
		E1.16.7	N/A	Physical processes table of responses
E1.16.7.1	Physical processes table of responses (via feedback form)			

Relevant section of the Consultation Report	Annex title	Annex number	Annex sub-number	Context
			E1.16.7.2	Physical processes table of responses (via all other methods)
		E1.16.8	N/A	Benthic subtidal and intertidal ecology table of responses
			E1.16.8.1	Benthic subtidal and intertidal ecology table of responses (via feedback form)
			E1.16.8.2	Benthic subtidal and intertidal ecology table of responses (via all other methods)
		E1.16.9	N/A	Fish and shellfish ecology table of responses
			E1.16.9.1	Fish and shellfish ecology table of responses (via feedback form)
			E1.16.9.2	Fish and shellfish ecology table of responses (via all other methods)
		E1.16.10	N/A	Marine mammals table of responses
			E1.16.10.1	Marine mammals table of responses (via feedback form)
			E1.16.10.2	Marine mammals table of responses (via all other methods)
		E1.16.11	N/A	Offshore ornithology table of responses
			E1.16.11.1	Offshore ornithology table of responses (via feedback form)
			E1.16.11.2	Offshore ornithology table of responses (via all other methods)
		E1.16.12	N/A	Commercial fisheries table of responses
			E1.16.12.1	Commercial fisheries table of responses (via feedback form)

Relevant section of the Consultation Report	Annex title	Annex number	Annex sub-number	Context
			E1.16.12.2	Commercial fisheries table of responses (via all other methods)
		E1.16.13	N/A	Shipping and navigation table of responses
			E1.16.13.1	Shipping and navigation table of responses (via feedback form)
			E1.16.13.2	Shipping and navigation table of responses (via all other methods)
		E1.16.14	N/A	Marine archaeology table of responses
			E1.16.14.1	Marine archaeology table of responses (via feedback form)
			E1.16.14.2	Marine archaeology table of responses (via all other methods)
		E1.16.15	N/A	Other sea users table of responses
			E1.16.15.1	Other sea users table of responses (via feedback form)
			E1.16.15.2	Other sea users table of responses (via all other methods)
		E1.16.16	N/A	Geology, hydrogeology and ground conditions table of responses
			E1.16.16.1	Geology, hydrogeology and ground conditions table of responses (via feedback form)
			E1.16.16.2	Geology, hydrogeology and ground conditions table of responses (via all other methods)
		E1.16.17	N/A	Hydrology and flood risk table of responses
			E1.16.17.1	Hydrology and flood risk table of responses (via feedback form)

Relevant section of the Consultation Report	Annex title	Annex number	Annex sub-number	Context
			E1.16.17.2	Hydrology and flood risk table of responses (via all other methods)
		E1.16.18	N/A	Onshore ecology table of responses
			E1.16.18.1	Onshore ecology table of responses (via feedback form)
			E1.16.18.2	Onshore ecology table of responses (via all other methods)
		E1.16.19	N/A	Onshore and intertidal ornithology table of responses
			E1.16.19.1	Onshore and intertidal ornithology table of responses (via feedback form)
			E1.16.19.2	Onshore and intertidal ornithology table of responses (via all other methods)
		E1.16.20	N/A	Historic Environment table of responses
			E1.16.20.1	Historic Environment table of responses (via feedback form)
			E1.16.21.2	Historic Environment table of responses (via all other methods)
		E1.16.21	N/A	Land use and recreation table of responses
			E1.16.21.1	Land use and recreation table of responses (via feedback form)
			E1.16.21.2	Land use and recreation table of responses (via all other methods)
		E1.16.22	N/A	Traffic and transport table of responses
			E1.16.22.1	Traffic and transport table of responses (via feedback form)

Relevant section of the Consultation Report	Annex title	Annex number	Annex sub-number	Context	
			E1.16.22.2	Traffic and transport table of responses (via all other methods)	
			E1.16.23	N/A	Noise and vibration table of responses
				E1.16.23.1	Noise and vibration table of responses (via feedback form)
				E1.16.23.2	Noise and vibration table of responses (via all other methods)
			E1.16.24	N/A	Air quality table of responses
				E1.16.24.1	Air quality table of responses (via feedback form)
				E1.16.24.2	Air quality table of responses (via all other methods)
			E1.16.25	N/A	Seascape, landscape and visual resources table of responses
				E1.16.25.1	Seascape, landscape and visual resources table of responses (via feedback form)
				E1.16.25.2	Seascape, landscape and visual resources table of responses (via all other methods)
			E1.16.26	N/A	Aviation and radar table of responses
				E1.16.26.1	Aviation and radar table of responses (via feedback form)
				E1.16.26.2	Aviation and radar table of responses (via all other methods)
			E1.16.27	N/A	Socio-economics table of responses
				E1.16.27.1	Socio-economics table of responses (via feedback form)
E1.16.27.2	Socio-economics table of responses (via all other methods)				

Relevant section of the Consultation Report	Annex title	Annex number	Annex sub-number	Context
		E1.16.28	N/A	Human health table of responses
			E1.16.28.1	Human health table of responses (via feedback form)
			E1.16.28.2	Human health table of responses (via all other methods)
		E1.16.29	N/A	Draft Habitats Regulations Assessment table of responses
		E1.16.30	N/A	Draft Development Consent Order table of responses
			E1.16.30.1	Draft Development Consent Order table of responses (via feedback form)
			E1.16.30.2	Draft Development Consent Order table of responses (via all other methods)
		E1.16.31	N/A	Targeted statutory consultation table of responses

1.3 Overview of the Transmission Assets

1.3.1 The Morgan and Morecambe offshore wind farms

- 1.3.1.1 The UK's ambition is to lead the world in combatting climate change, reducing reliance on fossil fuels and embracing a future where renewable energy powers homes and businesses. At the centre of this drive is a commitment to reducing UK greenhouse gas emissions and reaching net zero by 2050. The UK government has an ambition to generate 50 gigawatts (GW) of clean, renewable energy from offshore wind by 2030. Figures released by the Department for Energy Security and Net Zero (DESNZ) show that the UK currently has approximately 15 GW of installed offshore wind capacity in the UK up to the end of 2023 (DESNZ, 2024a). As such, there is still some way to go to meet the 2030 target (as set out in further detail in the Planning Statement accompanying the application – document reference J28).
- 1.3.1.2 Morgan Offshore Wind Limited (Morgan OWL), a joint venture between bp Alternative Energy Investments Ltd. (bp) and Energie Baden-Württemberg AG (EnBW), is developing the Morgan Offshore Wind Project. The Morgan Offshore Wind Project is a proposed offshore wind farm in the east Irish Sea.
- 1.3.1.3 Morecambe Offshore Windfarm Ltd (Morecambe OWL), a joint venture between Zero-E Offshore Wind S.L.U. (Spain) (a Cobra group company) (Cobra), and Flotation Energy Ltd., is developing the Morecambe Offshore Windfarm, also located in the east Irish Sea.
- 1.3.1.4 Both offshore wind farms will have a capacity of over 100 megawatts (MW) and are located wholly in English waters. They are therefore Nationally Significant Infrastructure Projects (NSIPs) under the Planning Act 2008.
- 1.3.1.5 Both the Morgan Offshore Wind Project and the Morecambe Offshore Windfarm have been awarded licences during The Crown Estate's Offshore Wind Leasing Round 4 process. Both offshore wind farms have a critical role to play in helping the UK to achieve its net zero ambitions and to reach offshore wind generation goals.

1.3.2 The Transmission Assets

- 1.3.2.1 Both the Morgan Offshore Wind Project and the Morecambe Offshore Windfarm were scoped into the 'Pathways to 2030' workstream under the Offshore Transmission Network Review (OTNR). The OTNR aims to consider, simplify, and wherever possible facilitate a collaborative approach to offshore wind projects connecting to the National Grid.
- 1.3.2.2 Under the OTNR, the National Grid Electricity System Operator (NGESO) is responsible for assessing options to improve the coordination of offshore wind generation connections and transmission networks and has undertaken a Holistic Network Design Review (HNDR). In July 2022, the UK Government published the 'Pathway to 2030 Holistic Network Design' documents, which set out the approach to connecting 50 GW of offshore wind to the National Grid (NGESO, 2022). A key output of the HNDR process was the recommendation that the Morgan Offshore Wind Project and the Morecambe

Offshore Windfarm should work collaboratively in connecting the two offshore wind farms to the National Grid electricity transmission network at Penwortham in Lancashire.

- 1.3.2.3 Morgan OWL and Morecambe OWL (the Applicants), being in agreement with the output from the HNDR, are jointly seeking a single consent for their electrically separate transmission assets comprising aligned offshore export cable corridors to landfall and aligned onshore export cable corridors to separate onshore substations (and associated infrastructure), and onward connection to the National Grid at Penwortham, Lancashire.

Section 35 direction

- 1.3.2.4 Section 35 of the Planning Act 2008 allows for the Secretary of State to give a direction for development to be treated as a development for which development consent is required.
- 1.3.2.5 Following the outcome of the HNDR, on 23 August 2022 the Applicants made such a request pursuant to Sections 35ZA(3)(b) and 35ZA(5) of the Planning Act 2008 to the Secretary of State, that the Morgan Offshore Wind Farm and Morecambe Offshore Windfarm transmission infrastructure both together and individually be treated as ‘development for which development consent is required’.
- 1.3.2.6 On the 4 October 2022, the Secretary of State issued a direction under section 35 of the Planning Act 2008 that the Transmission Assets should be treated as a ‘development for which development consent is required’.

Key elements of the Transmission Assets

- 1.3.2.7 The design philosophy for the Transmission Assets is for the Morgan Offshore Wind Project: Generation Assets and the Morecambe Offshore Windfarm: Generation Assets (referred to as ‘the Generation Assets’) to be electrically independent. Therefore, each offshore wind farm will have its own separate set of transmission assets (e.g., cable and substation infrastructure). However, the location of the infrastructure will be aligned (where practicable), for example within aligned offshore and onshore cable corridors to minimise impacts to environment and the community.
- 1.3.2.8 The key components of the Transmission Assets include the following:
- Offshore elements:
 - offshore export cables: these export cables will bring the electricity generated by the Generation Assets to the landfall for onward transmission.
 - Landfall:
 - landfall site: this is where the offshore export cables are joined to the onshore export cables via the transition joint bays. This term applies to the entire area between Mean Low Water Springs (MLWS) and the transition joint bays.
 - Onshore elements:

- onshore export cables: these export cables will be jointed to the offshore export cables via the transition joint bays at the landfall site, and will bring the electricity generated by the Generation Assets to the onshore substations;
- onshore substations: the two electrically separate onshore substations will contain the components for transforming the power supplied via the onshore export cables up to 400 kV;
- 400 kV grid connection cables: these export cables will bring the electricity generated by the Generation Assets from the two electrically separate onshore substations to the existing National Grid substation at Penwortham;
- environmental mitigation areas – temporary and/or permanent areas, including accesses identified to provide environmental mitigation only; and
- biodiversity benefit areas - temporary and/or permanent areas, including accesses identified to provide biodiversity benefit only.

1.3.2.9 The onshore export cables and the 400 kV grid connection cables will be completely buried underground for their entire length. No overhead pylons will be installed as part of the Transmission Assets.

1.3.2.10 All of the above elements will be located within the Transmission Assets Order Limits, as shown in Volume 1, Figure 1.1 of the Environmental Statement (ES) (document reference F1.6).

1.3.2.11 In addition to the electrical infrastructure outlined above, temporary onshore infrastructure will be required for the construction phase, including temporary construction compounds and accesses. Further details of the Transmission Assets are provided in the Volume 1, Chapter 3: Project description of the ES (document reference F1.3).

1.4 About the Applicants

1.4.1.1 As set out in **section 1.2** of this report, the Applicants are Morgan OWL and Morecambe OWL. Both Applicants are joint ventures made up of leading energy companies, bp and EnBW and Cobra and Flotation Energy respectively.

1.4.1.2 EnBW is one of the largest energy supply companies in Germany and supplies electricity, gas, water and energy solutions and energy industry services to around 5.5 million customers with a workforce of more than 27,000 employees. EnBW aims to strengthen its position as a sustainable and innovative infrastructure partner for customers, citizens and local authorities to an even greater extent. The repositioning of EnBW with a focus on renewable energies and smart infrastructure solutions is a key component of its strategy. With a focus on renewable energy and smart infrastructure solutions, EnBW's objective is for half of the electricity it supplies to be from renewable sources by the end of 2025. This is already having a noticeable effect on the reduction of CO₂ emissions, which EnBW aims to halve by 2030 and to be climate neutral by 2035. EnBW has been involved in the operation of hydro power plants in the Black Forest for more than 100 years

and has a large and continuously growing number of onshore wind farms and solar photovoltaics in Germany, France and Sweden. In addition, EnBW developed, constructed and operates four offshore wind farms in Germany (EnBW Baltic 1, Baltic 2, Hohe See and Albatros) with a total installed capacity of 945 MW, commissioned between 2011 and 2020. A further 960 MW offshore wind farm, He Dreiht, is currently under construction in Germany.

- 1.4.1.3 bp is an international company that delivers energy products and services to our customers around the world. bp's strategy is to transition to become an integrated energy company across low carbon energy, resilient hydrocarbons, and mobility and convenience. bp is working to help deliver a better, more balanced, energy system that is secure and affordable as well as increasingly lower carbon. bp is investing in offshore wind to establish a global position in the sector and build our portfolio to help serve the world's energy needs. This is part of bp's transformation to an integrated energy company and helping to play our part in providing secure, affordable and lower carbon energy. In the UK, bp and partner EnBW are leading the development of the Morgan and Mona offshore wind projects in the Irish Sea and the Morven offshore wind project in the North Sea. These projects have a combined potential generating capacity of 5.9 GW, sufficient to power the equivalent of around 6 million UK households. In early 2023, bp was successful in its bid to develop its first floating offshore wind demonstration project offshore Aberdeenshire. In Germany, bp is progressing our plans to develop two projects, Oceanbeat East and Oceanbeat West, with a combined potential generating capacity of 4 GW. In Asia, bp has formed a strategic partnership with Marubeni to explore offshore wind opportunities in Japan. bp also established a joint venture with Norway's Deep Wind Offshore, which saw bp acquire a 55% stake in the company's early-stage offshore wind portfolio of projects around the Korean Peninsula.
- 1.4.1.4 With 80 years of experience, Cobra is a historically significant Group in the development of industrial infrastructure and service provision, and one of the key players in the renewable energy sector in Spain and Latin America. The Group possesses the capacity and determination to develop, build, and operate industrial and energy infrastructures that demand a high level of service, grounded in excellence in integration, technological innovation, and financial robustness. Its unrivalled knowledge and understanding of offshore wind developments is a significant advantage in delivering a high quality and efficient project, coupled with our commitment to environmental stewardship. Its experience as a major player in offshore wind is based on a 50 MW project in operation and over 11.2 GW under development.
- 1.4.1.5 Flotation Energy, headquartered in Edinburgh, Scotland, sits at the heart of the energy transition. It's determined to support the big switch to sustainable, clean and affordable energy through the application of innovative offshore wind technology. An ambitious offshore wind developer, Flotation Energy has a 13 GW portfolio that covers both fixed and floating developments globally, with projects in the UK, Ireland, Taiwan, Japan and Australia. Whilst Flotation Energy develops projects independently, it also recognises the strategic value of partnership and collaboration to deliver proven, cost-effective solutions.

1.5 The consultation process

1.5.1 Key stages of consultation

- 1.5.1.1 The Applicants have undertaken stakeholder engagement throughout the pre-application stage of the Planning Act 2008 process. This includes technical meetings and workshops, one-to-one meetings and telephone calls with elected representatives, technical stakeholders, landowners and other interested parties. The Applicants also responded to queries received via the project email and phone line.
- 1.5.1.2 The stages of consultation undertaken by the Applicants are outlined in **Plate 1.1**. As set out in **section 1.3.1**, prior to the outcome of the HNDR process, the Applicants undertook separate early engagement in association with the Generation Assets. The earliest engagement from the Morgan Offshore Wind Project relevant to the Transmission Assets took place in spring/summer 2021, with a written communication sent to stakeholders in July 2021 (see Annex E1.3.1, document reference E1.3). The communication was primarily designed to introduce stakeholders to the Morgan Offshore Wind Project (including its transmission infrastructure, which was included in that DCO at the time) (see **section 3.3** of this report).
- 1.5.1.3 The earliest engagement from the Morecambe Offshore Windfarm relevant to the Transmission Assets took place between June – December 2021. This initial engagement took the form of an introduction to the Morecambe Offshore Windfarm for key stakeholders, including its transmission infrastructure, which was included in that DCO at the time. As the Morecambe Offshore Windfarm's Point of Interconnection was not defined during this time, information on transmission infrastructure took place without reference to this.
- 1.5.1.4 Following the outcome of the HNDR decision and subsequent section 35 direction, to ensure early engagement with communities, the Applicants carried out a first phase of non-statutory consultation between 2 November to 12 December 2022, presenting the Onshore and Offshore Transmission Assets scoping boundaries, within which search areas for the onshore and offshore transmission infrastructure were located.
- 1.5.1.5 Between 19 April and 4 June 2023, a second phase of non-statutory consultation was held, which focused on potential cable route options, landfall options and onshore substation locations. The information also confirmed the National Grid point of interconnection at Penwortham, as determined by National Grid. The Applicants' approach to non-statutory consultation is explained in more detail in **section 3** of this report.
- 1.5.1.6 The Applicants' statutory consultation ran from 12 October to 23 November 2023 and was based on the Preliminary Environmental Information Report (PEIR). The PEIR set out the findings of the EIA and Habitats Regulations Assessment (HRA) processes up to that point and the feedback received during previous phases of consultation. The Applicants' approach to statutory consultation is explained in more detail in **section 4** of this report.

- 1.5.1.7 Additional targeted statutory consultation took place from November 2023 to October 2024 with specific land interests and a small number of additional stakeholders; see **section 4.3** of this report for further details of the consultation activity undertaken.
- 1.5.1.8 Following statutory consultation, the Applicants reviewed all feedback received and sought further engagement with technical stakeholders as part of the ongoing EIA and HRA processes.
- 1.5.1.9 Following this review of feedback, alongside ongoing surveys, assessments and technical studies, the Applicants implemented design refinements which are included in the application for development consent.
- 1.5.1.10 Feedback received from all stages of consultation activity has been considered in the preparation of the application.

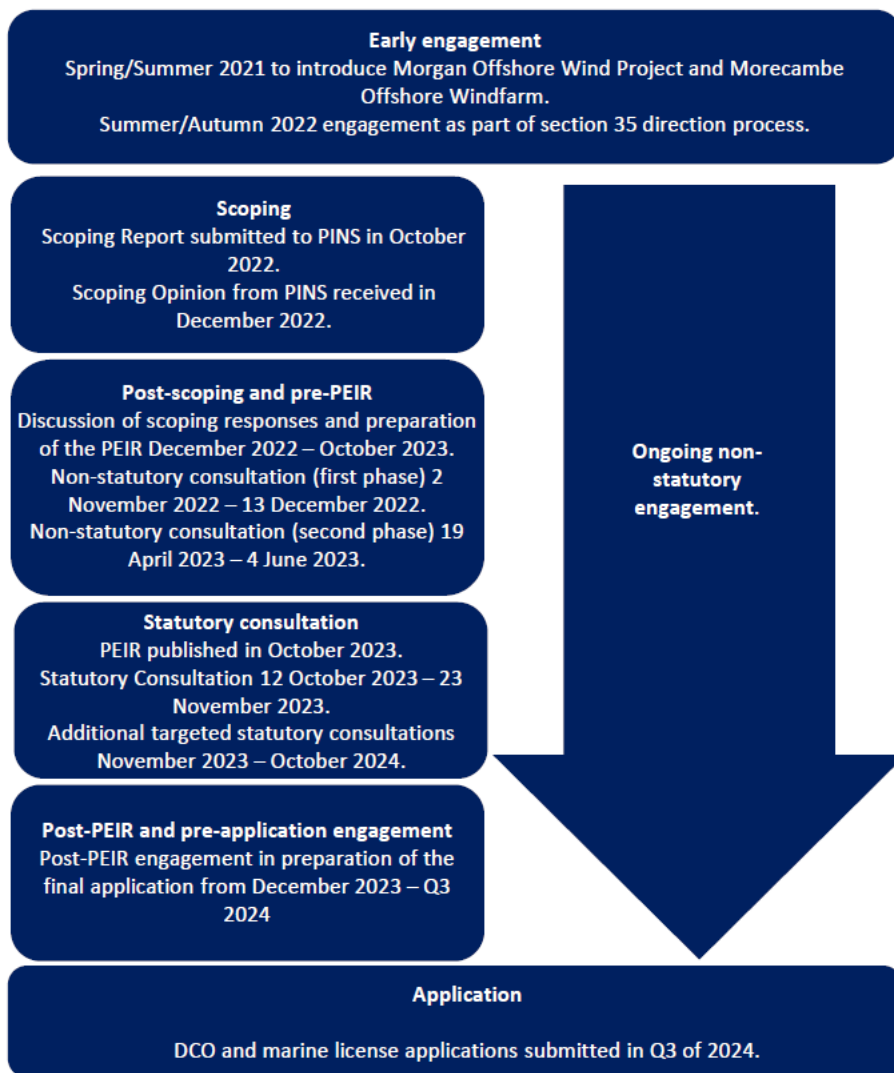


Plate 1.1: Summary of pre-application consultation and engagement undertaken

1.5.2 Technical engagement and Evidence Plan Process

1.5.2.1 The Applicants have undertaken an Evidence Plan Process (EPP), a formal mechanism whereby applicants and statutory bodies agree upfront what information and evidence applicants should submit in support of an application for development consent. This process involves open, constructive, collaborative, and solutions-focused engagement with technical stakeholders. Further information on the EPP and technical engagement is set out in **section 3.7** of this report and the Technical Engagement Plan (document reference E5).

1.5.2.2 A summary of the approach to technical engagement can be seen at **Plate 1.2** below.

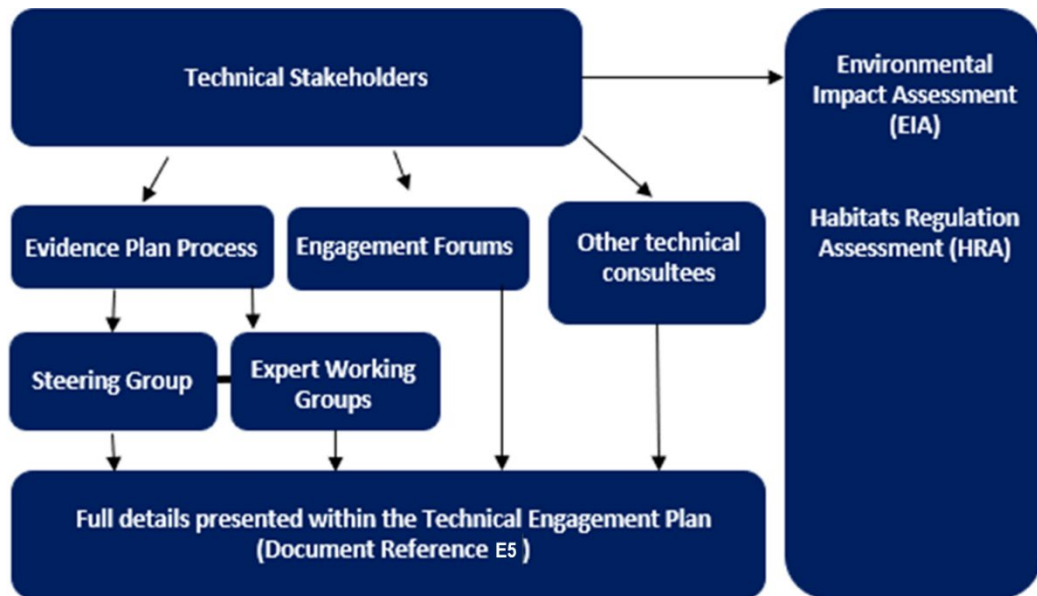


Plate 1.2: Summary of approach to technical engagement

1.6 Coordinated consultation approach

1.6.1.1 Since the HNDR decision, the Applicants have been clear that in consenting terms, the Transmission Assets comprise a Project requiring an application for development consent, separate to the applications for the Generation Assets.

1.6.1.2 However, to aid understanding among communities and stakeholders of the wider context for this application and consenting approach, a coordinated approach to consultation was adopted during the early, non-statutory stage of consultation for the Transmission Assets.

1.6.1.3 At these early events, the Applicants explained the outcomes of the HNDR process and that, while the Morgan Offshore Wind Project and the Morecambe Offshore Windfarm are two electrically separate offshore wind farms being developed in the east Irish Sea, the location of the infrastructure connecting these wind farms to the electricity transmission network is

proposed to be aligned (where practicable) to minimise impacts to the environment and the community.

- 1.6.1.4 As a result, the approach to the first stage of non-statutory consultation for the Transmission Assets was to carry out combined activities where the Transmission Assets, and both Generation Assets Projects were represented and to create combined materials. This approach aimed to reduce the volume of materials consultees would need to digest and to provide a coherent and 'joined-up' picture of the three Projects. This approach also considered the likelihood that attendees to the consultation events would expect alignment between the Projects in terms of the consultation events. All materials produced to support the first phase of non-statutory consultation included information on the Transmission Assets and Generation Assets Projects. This included the consultation brochure and feedback form. The Applicants also publicised the consultation for all Projects through online methods, print and Google advertising space (see **section 3.4.1** for further information).
- 1.6.1.5 The public events were held to help increase participation in the consultations across all Projects. This approach enabled visitors to attend events to find out about, ask questions, and provide feedback in relation to, all three Projects during a single visit. This coordinated approach to consultation events was also undertaken to reduce consultation and engagement fatigue in the local community and with key stakeholders. Consultation materials clearly included the project details and colours were used to distinguish between each of the projects. The feedback form provided enabled respondents to identify which Project their feedback applied to and allowed the Applicants to identify and attribute feedback to each Project accordingly.
- 1.6.1.6 The first phase of non-statutory consultation for the Transmission Assets shared materials and ran in combination with the non-statutory consultations for the Morgan Offshore Wind Project: Generation Assets and the Morecambe Offshore Windfarm: Generation Assets.
- 1.6.1.7 Due to the variances between the programmes, the second phase of non-statutory consultation for the Transmission Assets was then held concurrently with the statutory consultations for the Generation Assets. For this phase of non-statutory consultation separate brochures and feedback forms were produced, however joint advertising was used (see **section 3.4.2** for further information). Separate notifications were issued for the individual projects.
- 1.6.1.8 During both phases of non-statutory consultation for the Transmission Assets, consultation (both non-statutory and statutory) was also being undertaken for the Mona Offshore Wind Project (also being led by bp and EnBW) as part of this coordinated approach. Whilst no consultation materials were jointly prepared between the Transmission Assets and the Mona Offshore Wind Project, some publicity included all four Projects or a combination of them.
- 1.6.1.9 Information on the Mona Offshore Wind Project was also available at events held in the Isle of Man. These events also included the Transmission Assets.

- 1.6.1.10 A table showing a summary of consultation methods, locations and Projects represented as part of the coordinated approach to consultation is provided at Annex E1.1.1, document reference E1.1.
- 1.6.1.11 The statutory consultation for the Transmission Assets was held as a standalone consultation, focusing on the Project individually and did not involve any of the Generation Asset Projects (see **section 4** for further information).

2 Legislation, policy and guidance

2.1 Introduction

2.1.1.1 This Consultation Report has been prepared and submitted in accordance with the requirements set out within section 37 of the Planning Act 2008. Section 37(3)(c) requires an application for an order granting development consent to be accompanied by a consultation report. Section 37(7) sets out that the consultation report should give details of:

- what has been done to comply with the duty to consult with prescribed consultees and local authorities (section 42), the local community (section 47) and to publicise the application (section 48);
- any relevant responses; and
- consideration taken of any such responses.

2.1.1.2 Relevant responses are defined in section 49(3) of the Planning Act 2008 as responses received to consultation under sections 42, 47 and 48, by the deadline published. Additionally, where possible and necessary (for example, where the Applicants became aware of additional section 42 consultees), this feedback has also been referenced, up to as close to the submission of the application as possible even where this was outside the response period given.

2.1.1.3 The legislative context of these sections of the Planning Act 2008 and how the Applicants have met these requirements are further described in the associated sections of this Consultation Report as follows:

- the duty to consult under section 42 is addressed in **section 4.2**;
- the duty to consult under section 47 is addressed in **section 4.1**; and
- the duty to publicise under section 48 is addressed in **section 4.5**.

2.1.1.4 The report also details non-statutory consultation that took place outside of the requirements of the Planning Act 2008 to ensure that the Planning Inspectorate and others have a comprehensive understanding of all consultation activity undertaken. This is addressed in **section 3** of this report.

2.2 Relevant legislation and guidance

2.2.1.1 The Applicants have developed a phased approach to the pre-application consultation and, in doing so, gave careful consideration to the specific requirements set out in the following legislation:

- the Planning Act 2008;
- the Infrastructure Planning (Applications, Prescribed Forms and Procedures) Regulations 2009 (the APFP Regulations); and
- The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the 2017 EIA Regulations).

- The Conservation of Habitats and Species Regulations 2017 and the Conservation of Offshore Marine Habitats and Species Regulations 2017 (the HRA Regulations).

2.2.1.2 The Applicants have also taken into consideration the National Policy Statements (NPSs). The NPSs describe the national case and establish the need for certain types of infrastructure development including energy, as well as identifying key issues that should be considered by the Examining Authority and decision-maker when examining an application for development consent. There are six energy NPSs, three of which are relevant to the Transmission Assets, specifically:

- Overarching NPS for Energy (NPS EN-1) which sets out the UK Government's policy for the delivery of major energy infrastructure (DESNZ 2023b);
- NPS for Renewable Energy Infrastructure (NPS EN-3) (DESNZ 2023c); and
- NPS for Electricity Networks Infrastructure (NPS EN-5) (DESNZ 2023d).

2.2.1.3 The revised NPSs were formally designated on 17 January 2024. Further detail on the NPSs can be found within the Planning Statement (document reference J28).

2.2.1.4 Section 50 of the Planning Act 2008 provides for guidance to be issued regarding pre-application requirements and that the Applicants must have regard to any such guidance. In undertaking consultation and preparing this Consultation Report, the following guidance and advice notes have been taken into consideration and complied with:

- Planning Act 2008: Guidance on the pre-application process (DCLG, 2015);
- Advice Note 3, Environmental Impact Assessment (EIA) consultation and notification (Planning Inspectorate, 2017a);
- Advice Note 6, the preparation of application documents (Planning Inspectorate, 2017b);
- Advice Note 7, EIA: Preliminary Environmental Information, Screening and Scoping (Planning Inspectorate, 2020a);
- Advice Note 10, Habitats Regulations Assessment relevant to nationally significant infrastructure projects (Planning Inspectorate, 2022);
- Advice Note 11, Working with public bodies in the infrastructure planning process (Planning Inspectorate, 2017);
- Advice Note 12, Transboundary Impacts and Process (Planning Inspectorate, 2020b); and
- Advice Note 14, Compiling the Consultation Report (Planning Inspectorate, 2021).

2.2.1.5 **Section 4.6** of this report sets out a summary of consultation undertaken in accordance with the 2017 EIA and Habitats Regulations, with further details set out in the submitted ES (document references F1 – F4) and Technical

Engagement Plan (TEP) (document reference E5). The primary focus of this Consultation Report is on consultation undertaken in accordance with sections 42, 47 and 48 of the Planning Act 2008.

- 2.2.1.6 To demonstrate that the Applicants have met the requirements of both legislation and guidance regarding pre-application consultation, a Consultation Compliance Checklist is provided within Annex E1.2.1: Consultation compliance checklist (document reference E1.2).

2.2.2 2024 legislation and guidance

The Infrastructure Planning (Miscellaneous Provisions) Regulations 2024 (the 2024 Regulations)

- 2.2.2.1 The 2024 Regulations came into force on 30 April 2024 and amended the APFP Regulations. In particular, the replacement of the table within Schedule 1, setting out the prescribed consultees regarding whom should be consulted under section 42 of the 2008 Act (Regulation 2).
- 2.2.2.2 Regulation 4 of the 2024 Regulations deals with transitional provisions, confirming that the amendments in Regulation 2 do not apply to any proposed application where the applicant has started to consult under section 42 of the 2008 Act before 30 April 2024. The Applicants statutory consultation took place in Autumn 2023, prior to this date.
- 2.2.2.3 As such, the new 2024 Regulations do not apply to the Transmission Assets in this regard. It is clear that the relevant table applicable to the Transmission Assets in regard to section 42 consultation, is contained within Schedule 1 of the APFP Regulations. This has subsequently informed the section 42 consultee list, discussed in further detail at **section 4.2** of this Consultation Report. A full list of prescribed bodies, local authorities and non-prescribed consultees, in accordance with the APFP Regulations, is provided in Annex E1.9.1 (document reference E1.9).
- 2.2.2.4 Additionally, PINS Advice Note 3, which at the time of writing has not yet been updated to reflect the changes made by the 2024 Regulations and provides guidance on Schedule 1 of the APFP Regulations (prior to the amendments made by the 2024 Regulations), remains relevant. It is appropriate to continue to refer to this Advice Note as it advises on the version of the Regulations which continue to apply to the Transmission Project preapplication consultation.

National Infrastructure Planning Guidance Portal

- 2.2.2.5 On 17 April 2024, a new National Infrastructure Planning Guidance Portal was introduced providing access to and updates on the status of existing and newly published National Infrastructure Planning Guidance. This included an overarching introduction to National Infrastructure Planning Guidance (April 2024) and an updated guidance document setting out the requirements and expectations in the preparation of an application for development consent during the pre-application stage; The Planning Act 2008: Pre-application stage for Nationally Significant Infrastructure Projects (2024). This 2024

guidance was published on the 30 April 2024 and resulted in the withdrawal of the DCLG 2015 guidance.

- 2.2.2.6 Paragraph 006 (Reference ID 01-006-20240417) of the Introduction to National Infrastructure Planning Guidance sets out transitional arrangements. This states “*There may be occasions when guidance is revised when applicants have already commenced their statutory pre-application consultation or after an NSIP application has been submitted for acceptance or is in pre-examination or examination. It is not the intention for revisions to guidance to compromise the preparation or progress of applications which are already well underway.*”
- 2.2.2.7 The statutory consultation for the Transmission Assets Project had already been conducted prior to the publication of the 2024 Guidance and in compliance with the DCLG 2015 guidance. In order to fully comply with the 2024 Guidance, the statutory consultation would have to be undertaken again. This would compromise the progress of the application, which paragraph 006 of the Introduction Guidance confirms is not the intention of revisions to guidance. For this reason, the Applicants will proceed with the application for the Transmission Assets DCO on the basis of the statutory pre-application consultation conducted in compliance with the DCLG 2015 guidance which applied while the consultation was undertaken. This report therefore sets out how the statutory pre-application consultation for the Transmission Assets was conducted in compliance with the DCLG 2015 guidance.
- 2.2.2.8 Notwithstanding this position, the Applicants have undertaken an internal high level compliance check against the 2024 guidance which illustrates that the pre-application consultation undertaken and summarised within this report complies with the guidance if it was necessary to do so, with the exception of the newly introduced requirements such as a Programme Document at the start of the pre-application stage, cost recovery for the 3 levels of service and engagement with third party statutory consultees, the adequacy of consultation milestone and inclusion of Section 51 advice and regard to it within this Consultation Report. This compliance checklist against the 2024 guidance can be provided to the Planning Inspectorate on request if necessary post submission.

2.3 Approach to consultation

- 2.3.1.1 In addition to adhering to all legal requirements, the Applicants have committed to a consultation process underpinned by an ethos of being open and collaborative. This has included engaging outside of consultation periods, where required, and considering feedback provided after the consultation deadline(s) passed, and as close to the submission of the application as possible.
- 2.3.1.2 The Applicants believe that a vital part of the consenting process is seeking the views and collaborating with people and businesses in close proximity to the Transmission Assets who may be affected. Consultation has been designed to address those ‘living in the vicinity of the land’, as described in section 47 of the Planning Act 2008.

2.3.1.3 The insight and local knowledge received through each phase of consultation has allowed the Applicants to understand the views of those in close proximity to the Transmission Assets. When developing the consultation mailing zone (see **section 3.4** and **4.1.5** below, alongside **Plate 3.1** to **Plate 3.6** and **Plate 4.1** and **Plate 4.2**), the Applicants made sure to consider engagement with other key stakeholders in the local area. The consultation was designed to be open to anyone who felt directly or indirectly impacted by the Transmission Assets, including the following.

- Local communities – people with homes and businesses in the consultation zone and those outside who have previously commented on the Transmission Assets.
- Elected representatives – parish councils; county, district and unitary authority councillors.
- Members of Parliament (MPs).
- Seldom heard groups (SHGs).
- Identified special interest groups.
- Prescribed bodies and statutory consultees.
- Local authorities.
- Landowners and/or those with an interest in the land (hereafter referred to as PWILs).

2.3.1.4 The Applicants have had regard to equal opportunities and diversity throughout its consultation process. For example, the consultation brochures for both non-statutory and statutory stages of consultation clearly set out that readers could request the information in alternative (more accessible) formats and all consultation events were organised in accessible venues. To provide access to the consultation to the digitally disadvantaged, a suite of hard-copy consultation materials including the brochure, feedback form, PEIR Non-Technical Summary (PEIR NTS) and SoCC was also made available at seven deposit locations across the Project area (see **Table 4.2** for a list of the deposit locations used during the Applicants' statutory consultation). The Applicants also facilitated meetings with local stakeholders with specific requirements, including utilising the services of a British Sign Language interpreter. Please see further details in **sections 4.1.11.6** and **4.8.5.2** of this report.

2.3.1.5 From the outset, the Applicants have taken data privacy seriously and all data has been held in line with General Data Protection Regulation (GDPR) best practice. The feedback form, as referenced in **section 4.1.12**, clearly stated why data, including name, email and address, was being collected and contained the Applicants' privacy notice. The form also clearly stated that the data might be shared with relevant government bodies, such as the Planning Inspectorate and DESNZ, to support the application process, along with contractors and suppliers with whom the Applicants have contracts in place to support the development of the Transmission Assets. The notice stated that the Applicants would keep the information for the time required to fulfil the purposes of the application for development consent.

2.3.1.6 This Consultation Report and its accompanying annexes (document references E1.1 to E1.16) are also in compliance with GDPR best practice.

3 Non-statutory consultation and engagement

3.1 Introduction

- 3.1.1.1 Consultation and other engagement activities that have been undertaken beyond the statutory obligations set out under sections 42, 47 and 48 of the Planning Act 2008 are referred to within this report as non-statutory consultation.
- 3.1.1.2 Feedback from non-statutory consultation and ongoing stakeholder engagement activities has been considered by the Applicants and, where possible, used throughout the development of the Transmission Assets to inform the design, alongside comments received during statutory consultation periods.

3.2 Relevant guidance

- 3.2.1.1 The DCLG 2015 guidance on the pre-application process highlights the need for technical input from expert bodies prior to consultation taking place.
- 3.2.1.2 The guidance also suggests that applicants may wish to consider undertaking early non-statutory consultation at a stage where options are still being considered, as this may help inform development of proposals and assist the applicants in deciding what information and options to present at the statutory consultation stage.
- 3.2.1.3 Advice Note 14 (Planning Inspectorate, 2021) also recognises that applicants may have engaged in non-statutory consultation prior to statutory consultation under the Planning Act 2008, promoting best practice and encouraging full engagement with local communities. This period of non-statutory consultation is to be reported separately from the statutory consultation period.

3.3 Early engagement

3.3.1 Spring/summer 2021

- 3.3.1.1 As set out in **section 1.6** of this report, to aid understanding among stakeholders of the wider context for this application and consenting approach, early engagement and consultation was adopted during the non-statutory stages of consultation for the Transmission Assets. This set the context for the Transmission Assets in relation to the Generation Assets.

Morgan Offshore Wind Project

- 3.3.1.2 The earliest engagement undertaken by Morgan Offshore Wind Project took place in spring/summer 2021, with a written communication sent to stakeholders in July 2021. The communication was primarily designed to introduce stakeholders to the Morgan Offshore Wind Project, which at this time also included the transmission infrastructure (and the nearby Mona Offshore Wind Project). An example of the correspondence dated 14 July 2021, is included in Annex E1.3.1 (document reference E1.3).

3.3.1.3 This 2021 communication acknowledged that an agreed location for the connection to the national grid for the Morgan Offshore Wind Project was not yet known but that landowner engagement would be starting in order to carry out surveys (onshore and offshore) to inform potential cable routes and connection locations. The communication also covered the following:

- Introducing bp and EnBW as successful joint venture Round 4 bidders within the leasing process run by The Crown Estate.
- The likely size and generating capacity of Morgan Offshore Wind Project.
- That there would be consultation with communities and stakeholders, with informal engagement starting shortly and feeding into formal community consultations in 2022.
- It was hoped the Project would be able to start generating energy by 2028.
- A project website¹ launched by bp and EnBW would provide further information.

3.3.1.4 The communication was sent, via email, to the lead officers and elected representatives at local authorities listed in **Table 3.1** below (This includes Welsh authorities as the communication also related to the Mona Offshore Wind Project).

Table 3.1: Recipients of Morgan Offshore Wind Limited and Mona Offshore Wind Limited July 2021 email communication (lead officers and elected representatives)

Local Authority	Position
Cheshire West and Chester Council	Deputy Chief Executive - Communities, Environment and Economy
Cheshire West and Chester Council	Cabinet Member for Housing, Planning and Climate Emergency
Cyngor Bwrdeistref Sirol Conwy/Conwy County Borough Council	Cabinet Member for Environment and Transportation
Cyngor Gwynedd/Gwynedd Council	Cabinet Member for Environment/Councillor for Y Felinheli
Cyngor Sir Ddinbych/Denbighshire County Council	Lead Member for Waste, Transport and the Environment/Councillor for Rhyl South East
Cyngor Sir Ddinbych/Denbighshire County Council	Leader of the Council
Cyngor Sir Ynys Môn/Isle of Anglesey County Council	Major Projects and Economic Development Portfolio Holder
Cyngor Sir Ynys Môn/Isle of Anglesey County Council	Leader of the Council/Councillor for Talybolion
Fylde Council	Chair of Planning Committee
Fylde Council	Head of Planning

¹ www.enbw-bp.com

Local Authority	Position
Knowsley Council	Head of Planning
Lancashire County Council	Head of Planning
Lancashire County Council	Leader of the Council
Liverpool City Council	Head of Planning
Preston City Council	Cabinet Member for Planning and Regulation/Councillor for Lea & Larches
Sefton Council	Cabinet Member - Planning and Building Control
Sir y Fflint/Flintshire County Council	Cabinet Member for Planning and Public Protection
Sir y Fflint/Flintshire County Council	Chief Officer - Planning and Environment
South Ribble Borough Council	Cabinet Member for Planning, Business Support and Regeneration
St Helens Council	Head of Planning
West Lancashire Borough Council	Portfolio Holder for Planning
Wirral Council	Chair - Environment, Climate Emergency and Transport Committee

3.3.1.5 In addition, the notification was sent to MPs and Members of the Senedd (MS) representing local and regional constituencies across the coast of north west England and north Wales. This included those listed in **Table 3.2** below.

Table 3.2: MP and MS recipients of Morgan Offshore Wind Limited and Mona Offshore Wind Limited July 2021 email communication

Constituency	MP/MS
Member of Parliament for Wirral South	Alison McGovern MP
Member of Parliament for Wallasey	Angela Eagle MP
Member of Parliament for Sefton Central	Bill Esterson MP
Member of the Senedd for North Wales	Carolyn Thomas MS
Member of Parliament for City of Chester	Chris Matheson MP
Member of Parliament for Southport	Damien Moore MP
Member of Parliament for Walton Liverpool	Dan Carden MP
Member of the Senedd for Clwyd West	Darren Millar MS
Member of the Senedd for Vale of Clwyd	Gareth Davies MS
Member of Parliament for Knowsley	George Howarth MP
Member of the Senedd for Delyn	Hannah Blythyn MS
Member of Parliament for Arfon	Hywel Williams MP
Member of the Senedd for Alyn and Deeside	Jack Sargeant MS
Member of Parliament for Vale of Clwyd	James Davies MP
Member of the Senedd for Aberconwy	Janet Finch-Saunders MS
Member of Parliament for Ellesmere Port and Neston	Justin Madders MP

Constituency	MP/MS
Member of Parliament for South Ribble	Katherine Fletcher MP
Member of the Senedd for North Wales	Llyr Gruffydd MS
Member of Parliament for Wirral West	Margaret Greenwood MP
Member of Parliament for Preston	Mark Hendrick MP
Member of the Senedd for North Wales	Mark Isherwood MS
Member of Parliament for Fylde	Mark Menzies MP
Member of Parliament for Alyn and Deeside	Mark Tami MP
Member of Parliament for Bootle	Peter Dowd MP
Member of the Senedd for Ynys Môn	Rhun ap Iorwerth MS
Member of Parliament for Delyn	Rob Roberts MP
Member of Parliament for Aberconwy	Robin Millar MP
Member of Parliament for West Lancashire	Rosie Cooper MP
Member of the Senedd for North Wales	Sam Rowlands MS
Member of the Senedd for Arfon	Siân Gwenllïan MS
Member of Parliament for Ynys Môn	Virginia Crosbie MP

- 3.3.1.6 As further detail became available, between November 2021 and January 2022, introduction briefings were followed by project updates to planning officers and lead members at local authorities across northwest England.
- 3.3.1.7 This series of briefings was held via Microsoft Teams and centred around a PowerPoint presentation. The presentations were either ‘technical’ presentations, where the attendees were planning or other officers from local authorities, or ‘non-technical briefings’ where the attendees were wholly or largely elected members. In practice, the presentations were similar in scope, but with ‘technical’ briefings offering more detail on the consenting and site selection processes.
- 3.3.1.8 The presentations introduced the fact National Grid were considering a number of different potential locations for the point of interconnection and this in turn would help to determine the broad location at which the export cables would make landfall and the broad location of the onshore substations. The presentation made clear that a final decision on which point of interconnection would be used would be made by National Grid, and not the Applicants, but that the Applicants were keen to engage in an early and transparent manner. Specifically, the presentations covered:
- an overview of the Morgan Offshore Wind Project and the Mona Offshore Wind Project ;
 - activities conducted during 2021;
 - an indicative project timeline;
 - a stakeholder engagement timeline;

- the guiding principles that would be used to determine potential cable routes to any onshore substation site that was ultimately selected by National Grid; and
- high level assessments of the potential economic impacts.

3.3.1.9 Briefings were conducted with:

- Chorley Council;
- Lancashire County Council;
- Preston City Council;
- South Ribble Borough Council;
- West Lancashire Borough Council; and
- Wigan District Council.

3.3.1.10 Briefings were also offered to Blackpool Council, Fylde Council, Knowsley Metropolitan Borough Council, Sefton Council and St Helens Borough Council, which declined the offer. The invitation was left open by the Applicants, with a commitment made to continue updating the authorities on progress. Minutes were taken during the meetings that were held and then circulated to those in attendance for record keeping and future reference.

3.3.1.11 An email was sent on 6 May 2022 to those who attended the above briefings. The email informed them that work was still ongoing to find a point of interconnection for the Morgan Offshore Wind Project.

Morecambe Offshore Windfarm

3.3.1.12 Early engagement undertaken by Morecambe Offshore Windfarm Ltd, which included outline information on the requirements for the Transmission Assets, took place in summer 2021, with a written communication sent to stakeholders in October 2021. This communication was primarily designed to introduce stakeholders to the Morecambe Offshore Windfarm and seek a meeting to discuss pre-application duties relating to consultation and environmental assessment parts of the DCO application process. An example of the correspondence dated 22 October 2021, is included in Annex E1.3.1 (document reference E1.3).

3.3.1.13 Introductory meetings took place between October 2021 and June 2022. The communication was sent, via email, to a number of key stakeholders, including local authorities and statutory stakeholders, listed in Table 3.3 below.

Table 3.3: Recipients of Morecambe Offshore Windfarm October 2021 email communication (lead officers and elected representatives, if appropriate)

Organisation
Fylde Council
Lancashire County Council
South Ribble Borough Council
Lancaster City Council
Wyre Council
The Welsh Government
The Isle of Man Government
Cumbria Local Enterprise Partnership (LEP)
Seatruck
Stena Line
Isle of Man Steam Packet Company
Maritime and Coastguard Agency (MCA)
Blackpool Airport
Royal Yachting Association
Marine Management Organisation
Natural England/JNCC
Environment Agency
Historic England
National Highways
RSPB
The Wildlife Trusts
Whale and Dolphin Conservation
North Western Inshore Fisheries and Conservation Authority (NWIFCA)
The National Federation of Fishermen's Organisations (NFFO)

- 3.3.1.14 As further detail became available, introduction briefings were followed by project updates with stakeholders as appropriate.
- 3.3.1.15 Introductory meetings took place between October 2021 and June 2022. This series of meetings was held via Microsoft Teams and centred around a PowerPoint presentation.
- 3.3.1.16 Specifically, the content of the meetings included:
- An overview of the Morecambe Offshore Windfarm.

- Site Selection (an overview of the methodology, process and update on work undertaken to date).
- Approach to EIA.
- Outline of the programme.

3.3.1.17 This early communication acknowledged that an agreed location for the connection to the National Grid for the Morecambe Offshore Windfarm was not yet known.

3.3.2 Summer/autumn 2022

3.3.2.1 In July 2022, the UK Government published the Pathway to 2030 Holistic Network Design Report which set out the results of the UK Government's Offshore Transmission Network Review ("OTNR") and its proposed approach to connecting 50GW of offshore wind to the UK national grid. This concluded that the Morgan Offshore Wind Project and the Morecambe Offshore Windfarm should work collaboratively to connect the wind farms to the national grid at Penwortham in Lancashire.

3.3.2.2 The Applicants held meetings with the below LPAs at this time, ahead of the section 35 direction decision.

- Fylde Council (12 Sept 2022).
- Preston City Council and Lancs County Council (12 Sept 2022).
- Blackpool Council (28 Sept 2022).
- South Ribble Borough Council (30 Sept 2022).

3.3.2.3 On the 4 October 2022, the Secretary of State issued a direction under section 35 of the Planning Act 2008 that the Transmission Assets should be treated as a 'development for which development consent is required' (see **section 1.3.2** for further information).

3.3.3 Follow up meetings

3.3.3.1 Follow up meetings were held with elected representatives and regional forums between 2022 and 2023 to keep them updated on progress, this included:

- Mark Menzies MP;
- Katherine Fletcher MP;
- Lancashire County Council;
- South Ribble Borough Council;
- Fylde Council;
- Preston City Council;
- Blackpool Council;
- Barrow in Furness Borough Council;

- Cumbria Local Enterprise Partnership; and
- Blackpool, Fylde and Wyre Prosperity Board.

3.4 Non-statutory consultation process

3.4.1 Consultation period 2 November to 13 December 2022

Introduction

3.4.1.1 Following the initial engagement with stakeholders detailed in **section 3.3** above, a first phase of non-statutory consultation ran for 41 days between 2 November and 13 December 2022.

3.4.1.2 To avoid consultation fatigue, and to present a full picture of the proposed development to stakeholders, the Applicants consulted together with both Generation Assets Projects, as set out in **section 1.6**.

The consultation mailing zone

3.4.1.3 The Applicants identified a consultation mailing zone, to publicise the consultation, by reference to the search area for onshore infrastructure associated with the Transmission Assets in addition to the areas that were likely to be impacted by the generation assets projects. This mailing zone covered 36,405 residential and business addresses in the FY4, FY8, PR1, PR2, PR4 postcodes, as shown in **Plate 3.1** below. In addition, the Applicants used a commercial service provided by the Isle of Man Post Office to distribute consultation postcards to all 45,811 residential and business addresses on the Isle of Man.

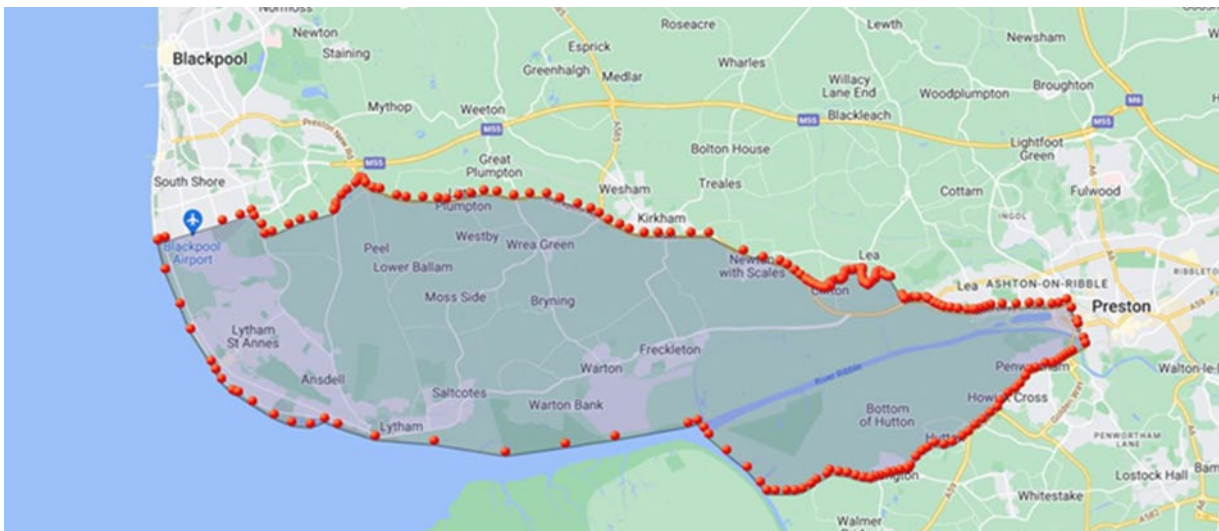


Plate 3.1: Consultation mailing zone (2 November to 13 December 2022)

Consultation materials

3.4.1.4 The consultation materials covered the following key elements of the Transmission Assets, as well as an overview of the Generation Assets Projects:

- project rationale and information about the Applicants;
- onshore infrastructure including plans for a point of interconnection, onshore substation options and cable routes;
- offshore infrastructure including broad plans for offshore substation platforms;
- the application process and consenting process;
- ongoing environment and technical assessments;
- potential jobs and skills opportunities;
- engagement with ports, harbours, shipping, navigation and additional consultees; and
- next steps.

3.4.1.5 The consultation launched on 2 November 2022 and was promoted in the following ways.

- An information postcard was distributed to the 36,405 addresses within the consultation mailing zone on the UK mainland and 45,811 addresses on the Isle of Man (Annex E1.3.2, document reference E1.3).
- Ahead of consultation launch, posters were sent to 30 local community organisations and councils in England with a request to display at appropriate locations. The posters were dispatched in order to arrive before the day of consultation launch, 1 November 2022 . Posters were also sent to 43 locations on the Isle of Man (Annex E1.3.3, document reference E1.3).
- Advertisements appeared in the Lancashire Evening Post and the Daily Post. The advertisements were timed to coincide with the start of consultation, detailing in-person events in each area alongside a webinar and general consultation information (Annex E1.3.4, document reference E1.3).
- A media release was distributed to media outlets on 4 November 2022 announcing the launch of the consultation and explaining how to access consultations materials and provide feedback. The media release was covered by Energy FM, North Lancashire's Beyond Radio, the Lancashire Evening Post, BBC News and Isle of Man Today (Annex E1.3.5, document reference E1.3).
- An email was distributed to local stakeholders to announce consultation launch on 2 November 2022 and inviting them to take part. These stakeholders included MPs for immediate and neighbouring constituencies, local planning authorities, local elected leaders, councils and interest groups such as associations, government agencies and environmental groups (Annex E1.3.6, document reference E1.3).
- A separate email was also distributed to local SHGs (Annex E1.3.7, document reference E1.3).

- Social media activity was also delivered via four posts on the Flotation Energy’s LinkedIn page, which, at the time, had more than 5,000 followers (Annex E1.3.8, document reference E1.3).

3.4.1.6 A joint website for Morecambe Offshore Windfarm and Morgan Offshore Wind Project went live on 2 November 2022 (hereafter referred to as the joint website), and included the below content at consultation launch²:

- introduction to both Generation Assets Projects and the Transmission Assets;
- background on the Applicants;
- information relating to onshore infrastructure, including broad information for a point of interconnection, onshore substations and the onshore cable route;
- information relating to offshore infrastructure, including broad plans for turbines and background information on the construction of offshore windfarms;
- environmental and technical assessments;
- how energy will reach homes and businesses;
- consenting process;
- The Crown Estate Offshore Wind Leasing Round 4;
- jobs and skills;
- in-person consultation events and online webinar;
- feedback map; and
- downloads, including:
 - consultation brochure (Annex 3.9, document reference E1.3); and
 - feedback form (Annex 3.10, document reference E1.3).

3.4.1.7 Screenshots of the updated joint website are available at Annex E1.3.11 (document reference E1.3).

Consultation events

3.4.1.8 The Applicants ensured that representatives of the Applicants’ team were accessible to members of the public so they could find out more about the Transmission Assets, ask any questions and/or meet the team in a variety of ways. The Applicant ensured that appropriate, fully qualified team members from a range of disciplines (including, but not limited to, consents, land management and stakeholder engagement) attended all public facing events. Consultation events were held and attended as set out in **Table 3.3** below.

² <https://morecambeandmorgan.com/>

Table 3.3: Non-statutory consultation events held during consultation period 2 November to 13 December 2022

Type	Date	Location	Time	Number of attendees
Event	3 November 2022	Douglas Borough Council, Town Hall, Ridgeway St, Douglas, Isle of Man, IM99 1AD	3-7pm	85
Webinar	10 November 2022	Online	6.30-8pm	47
Pop-up	18 November 2022	Barrow-in-Furness Leisure Centre, Greengate St, Barrow-in-Furness, LA13 9DT	10am-1pm	45
Event	19 November 2022	Morecambe War Memorial Hall, Church St, Morecambe, LA4 5PR	2.30-6.30pm	2
Event	21 November 2022	Lytham Assembly Rooms, Lytham, FY8 5JY	3-7pm	151
Pop-up	22 November 2022	Fleetwood YMCA Leisure Centre, Fleetwood, FY7 6HF	10am-1pm	26
Pop-up	22 November 2022	Blackpool Tourist Information Centre, Promenade, Blackpool, FY1 1AP	2.30-4.30pm	0
Pop-up	23 November 2022	Preston Fishergate Shopping Centre, Preston PR1 8HJ	10am-1pm	7
Event	23 November 2022	Hutton Village Hall, Moor Lane, Hutton, Preston, PR4 5SE	3-7pm	99
Pop-up	24 November 2022	Southport Eco Centre, Esplanade, Southport, PR8 1RX	10am-1pm	52
Event	24 November 2022	The Guild Hall, Church Rd, Formby, Liverpool, L37 3NG	3-7pm	1
Pop-up	30 November 2022	Amlwch Town Hall, Amlwch LL68 9EN	10am-1pm	4

3.4.1.9 Hard copies of the consultation brochure and feedback forms to take away were available at all events. At the larger consultation events external signage including ‘wobble boards’ were placed outside advertising where they were taking place on that day (Annex E1.3.12, document reference E1.3) and event panels and detailed maps were on display providing background information and additional context to attendees (Annex E1.3.13, document reference E1.3).

3.4.1.10 A webinar took place on 10 November 2022. A presentation was prepared (Annex E1.3.14, document reference E1.3) and a recording of the event was uploaded to the joint website.

Summary of responses

- 3.4.1.11 A total of 628 pieces of feedback were received and marked as relating to the Transmission Assets from the non-statutory consultation period between 2 November and 13 December 2022:
- 585 submitted via feedback form;
 - 38 submitted via email³; and
 - five submitted via post to the Freepost MORECAMBE AND MORGAN address.

- 3.4.1.12 These responses have been structured according to the questions as laid out in the non-statutory consultation feedback form. The feedback form questions related to both the Transmission Assets and the Generation Assets. In total, there were seven questions; question 3 was only relevant to the Generation Assets and is not included below. However, if any feedback relating to transmission assets was erroneously included in Q3, this was also considered by the Applicant. A full list of questions can be found in Annex E1.3.10 (document reference E1.3). This feedback and the Applicants' response can be summarised as follows:

Q1. The proposed Morecambe and Morgan transmission assets infrastructure will include an onshore cable corridor route within which the onshore export cables will be buried.

Do you have any comments or feedback related to the routing and site selection of the onshore cable corridor within the Scoping boundary? For example, this may relate to ecology, cultural heritage, residential properties or land use.

- 3.4.1.13 Many of those responding to this question were keen that the onshore export cable route follow the line of existing infrastructure (e.g. highways including the M55, and the Blackpool branch rail line routes from Preston to Blackpool). These consultees felt that co-locating with existing infrastructure could help reduce the impact of construction on the surrounding countryside.
- 3.4.1.14 Others were keen to ensure that reducing the impact on the existing infrastructure during construction was prioritised. There was also a suggestion that a new bridge could be constructed to the west of the current most westerly A59 Guild Way Bridge over the River Ribble, close to the existing National Grid substation at Penwortham, and that the cable route could then cross the river at this point, if it were built.
- 3.4.1.15 Consultees also wanted the Project to consider the Ribble Estuary in several ways. Some suggested that the banks – or even bed – of the River Ribble should be considered for the cable route. However, others expressed strong opposition to this based on the potential impact on wildlife.
- 3.4.1.16 Elsewhere, consultees with a detailed understanding of the Transmission Assets scoping boundary were keen to understand the potential impact of the

³ Info@morecambeandmorgan.com

proposed landfall location on the Lytham St Anne's Dunes Site of Special Scientific Interest (SSSI). There was also feedback from landowners calling for the Project to consider its impact on food production.

Applicants' response to Q1

- 3.4.1.17 The route planning and site selection process for the onshore export cable corridor and 400 kV grid connection cable corridor has involved the identification of a range of engineering, commercial, environmental, land interest and community related principles and constraints. These have been used to identify the onshore export cable corridor route options for consideration.
- 3.4.1.18 Engineering considerations have included aspects such as technical feasibility and the identification of the most direct route, wherever practicable and in consideration of existing constraints. Examples of environmental constraints that have been considered are designated sites, protected species, landscape and cultural considerations. Other constraints that have been considered include the location of existing utilities and other local infrastructure.
- 3.4.1.19 The EIA Scoping Report showed the search area where the offshore export cables could make landfall (come onshore). The Applicants' site selection process identified a preferred area for this given a range of technical and environmental considerations. Further engagement with PWILs helped to refine the onshore export cable corridor and 400 kV grid connection cable corridor.
- 3.4.1.20 The Ribble estuary has numerous ecological designations protected by UK legislation. These include the Liverpool Bay Special Protection Area, Ribble and Alt Estuary Special Protection Area, the Ribble and Alt Estuary Ramsar site (a wetland of international importance under the Ramsar Convention), the Ribble Estuary Site of Special Scientific Interest, Ribble Estuary Marine Conservation Zone and Ribble Estuary National Nature Reserve.
- These designations protect sensitive estuarine habitat associated with European smelt (*Osmerus eperlanus* – a rare and protected species of fish) and breeding, passaging and over-wintering bird species listed as of conservation concern.
- 3.4.1.21 The tidal nature and shallow water depths of the estuary also create heightened risk to construction as the unstable riverbed conditions are unsuitable for trenching/ cable laying vessels to access. As such, cabling through the estuary would result risk extensive, and potentially long-term damage to sensitive and protected habitats that support smelt and protected bird species, whilst also presenting potentially unsafe working conditions during construction. This option was, therefore, discounted by the Applicants as not being able to adequately minimise interaction or avoid sensitive features with limited ability to technically engineer a viable and mitigable design solution.
- 3.4.1.22 Further information was subsequently presented in Section 4.8.2.2 of Volume 1, Chapter 4 of the PEIR relating to the consideration of routing through the

River Ribble. Please also refer to Volume 1, Chapter 4; Site selection of the ES (document reference F1.4).

Q2. The proposed Morecambe and Morgan transmission assets infrastructure will comprise two onshore substations.

Do you have any comments or feedback that could help inform the site selection for the onshore substations? For example, this may relate to ecology, cultural heritage, residential properties or land use.

- 3.4.1.23 Feedback in response to this question asked for brownfield sites to be considered for substation construction, and for the impact on surrounding areas to be limited.
- 3.4.1.24 Consultees who live in the vicinity of the existing National Grid substation at Penwortham were particularly keen to ensure that any potential impacts on the local countryside are minimised, including the impact of construction on minor country roads.
- 3.4.1.25 Requests to consider potential impacts on wildlife (particularly wildfowl) in the Ribble Estuary from construction and operation were also a key issue.

Applicants' response to Q2

- 3.4.1.26 The Applicants have considered feedback relating to the location of new onshore substations required to connect to the electricity transmission network. The site selection process has also considered many important factors such as proximity to nearby receptors, environmental and technical constraints (such as ground conditions and access constraints) which together informed the indicative onshore substation search areas presented at statutory consultation. Further details can be found in Volume 1, Chapter 4: Site selection and consideration of alternatives of the ES (document reference F1.4).
- 3.4.1.27 Please note: As set out above (see **section 3.4.1.12**) Q3 was only relevant to the Generation Assets and therefore not included.

Q4. The proposed Morecambe and Morgan offshore wind farms will include an offshore cable corridor route(s) within which the offshore export cables will be located.

Do you have any comments to make about the offshore cable corridor route(s)?

- 3.4.1.28 Consultees considering the offshore cable route were keen to ensure any potential impacts of construction and operation of the offshore cables were limited.
- 3.4.1.29 Consultees also sought reassurance about potential impacts of offshore transmission infrastructure on shipping routes and the fishing industry, and marine wildlife.
- 3.4.1.30 Some consultees suggested that the offshore cable route should make landfall on the Isle of Man, to allow the community to benefit from the electricity generated.

Applicants' response to Q4

- 3.4.1.31 The feedback was considered in the location of the offshore export cable corridor that was subsequently presented in the PEIR.
- 3.4.1.32 The offshore export cables will be buried with the temporary impact of disturbance during installation of the offshore export cables monitored, where necessary.
- 3.4.1.33 Potential safety risks for fishing stakeholders have been assessed as part of the EIA process, as presented in the PEIR and has been expanded further in the ES, supported by ongoing engagement with fisheries representatives.
- 3.4.1.34 The Applicants have worked closely with marine stakeholders throughout the development process, for example, via the establishment of the Marine Navigation Engagement Forum (MNEF, and will continue to do so in future stages of the Transmission Assets to limit potential impacts during all phases of the project.
- 3.4.1.35 The Isle of Man is connected to the UK national grid via an interconnector cable which runs beneath the sea between Douglas on the Isle of Man, and Bispham on the Lancashire coast. Electricity generated by the Generation Assets, when operational, would be available to the Isle of Man through the Manx Utilities Authority, which can draw on the power generated to meet the needs of residents and businesses, when required. The connection location for the Morgan and Morecambe Offshore Windfarms was determined by the Electricity System Operator's (ESO) Holistic Network Design (HND) process. The HND report was published in July 2022 and assessed potential connection locations and associated transmission network reinforcements for all The Crown Estate (TCE) Round 4 offshore wind lease areas. The transmission assets associated with both the Morgan Offshore Wind Project and the Morecambe Offshore Windfarm were directed by the National Grid ESO to connect into Penwortham and it is not in the Applicants control to disregard this decision.

Q5. As we develop our proposals, we are looking for opportunities to manage and mitigate potential impacts resulting from the construction, operation and maintenance of the projects on local residents and communities, where practicable.

Do you have any comments that could help us as we develop and refine our proposals? For example, this may relate to the use of the local road network or areas prone to flooding.

- 3.4.1.36 Feedback on this issue focussed on the need to manage and mitigate potential impacts on shipping routes to the Isle of Man. While this feedback is mostly focused on the Generation Assets, it is also a relevant consideration for offshore elements of the Transmission Assets (e.g., offshore export cables).
- 3.4.1.37 Consultees also wanted the Applicants to manage and mitigate impacts on marine life and seabirds, including heat or electromagnetic fields from cables.

Applicants' response to Q5

- 3.4.1.38 The Applicants understand the vital importance of the lifeline ferry routes serving the Isle of Man and have worked closely with marine stakeholders to ensure any impacts that are identified can be addressed appropriately, wherever possible.
- 3.4.1.39 A thorough analysis of vessel traffic data, navigational risk modelling and engagement with marine stakeholders has helped the Applicants understand the needs of this stakeholder group and develop the proposals appropriately.
- 3.4.1.40 The Applicants have also worked with a range of stakeholders to develop the Project in respect to nature conservation, engaging with groups focused on marine life, offshore ornithology and marine mammals.

Q6. Do you have any comments on this consultation? For example, feedback on the process, events, supporting materials or methods of engagement.

- 3.4.1.41 Many consultees praised the Projects and the proactive approach to consultation.
- 3.4.1.42 There were some requests for further consultation on the Isle of Man, and additional information on potential impacts on shipping routes to the Isle of Man. Specific requests were made for consultation materials, particularly with regard to the Generation Assets, to include a map showing other existing or proposed wind farms in the Irish Sea. It was also requested that more time be allowed between the launch of the consultation and the event held on the Isle of Man.

Applicants' response to Q6

- 3.4.1.43 The Applicants consulted extensively on the Isle of Man. A public consultation event was held in the council chamber at the Douglas Borough Council buildings in November 2022 (first phase non-statutory consultation), and a postcard was delivered promoting the event and the consultation to businesses and residential addresses across the Isle of Man. More than 80 people attended to discuss the proposals with the Applicants' Project teams in person.
- 3.4.1.44 The feedback provided on the consultation approach was considered as the Project team prepared for future stages of consultation and events on the Isle of Man were also held in May 2023 (second phase non-statutory consultation) and November 2023 (statutory consultation). Specifically, the request made in feedback at the first phase non-statutory consultation for more than one event on the Isle of Man was noted and two events were held there during the second phase non-statutory consultation in spring 2023.

Q7. Do you know if there are any local events or areas of cultural, heritage or environmental significance that we should be aware of?

- 3.4.1.45 Responses focused on the potential impacts of the Projects on shipping routes to the Isle of Man, with concerns expressed as to how this would potentially affect the island's cultural life, tourism and associated events.
- 3.4.1.46 Other responses focused on environmental impacts, particularly on marine animals.
- 3.4.1.47 Support was also expressed for the Project's position as a renewable energy project and its contribution towards net zero and energy security.

Applicants' response to Q7

- 3.4.1.48 The Applicants understand the cultural importance of the ferry routes serving the Isle of Man. The Project team has worked closely with marine stakeholders to identify potential impacts and how these can be addressed appropriately. The PEIR and ES address potential impacts and mitigation.
- 3.4.1.49 The PEIR and ES also outline the Applicants' approach to assessing the impacts on marine ecology (including marine processes, benthic ecology, fish and shellfish ecology), offshore ornithology and marine mammals.

The Applicants are grateful to all those who expressed support for the Transmission Assets proposals during the consultation. The Transmission Assets will play a key role in enabling clean energy to reach the National Grid and contribute to the UK's decarbonisation and net zero targets.

3.4.2 Consultation period 19 April to 4 June 2023

Introduction

- 3.4.2.1 Following the first phase of non-statutory consultation (2 November to 13 December 2022), the Applicants launched a second phase of non-statutory consultation the following spring. As set out in **section 1.6**, the second phase of non-statutory consultation for the Transmission Assets was held concurrently with statutory consultations for the Generation Assets Projects.
- 3.4.2.2 The purpose of this consultation was to provide an update on the proposed plans for the Transmission Assets and seek feedback on four indicative search areas for siting the two new onshore substations, as well as the indicative search areas for the onshore export cable corridor and 400 kV grid connection cable corridor.
- 3.4.2.3 This second phase of non-statutory consultation was conducted between 19 April and 4 June 2023 and ran for 46 days.
- 3.4.2.4 A table showing a summary of consultation methods, locations and projects represented at this stage of consultation as part of the coordinated approach is provided at Annex E1.1.1 (document reference E1.1).

The consultation mailing zone

- 3.4.2.5 The Applicants refined the consultation mailing zone for this second non-statutory consultation phase, based on the search area for the Transmission Assets as well as homes and businesses near the consultation events venues. In total, 58,265 postcards were sent to residential and business addresses in these areas, as shown in **Plate 3.2**, **Plate 3.3**, **Plate 3.4** and **Plate 3.5**.

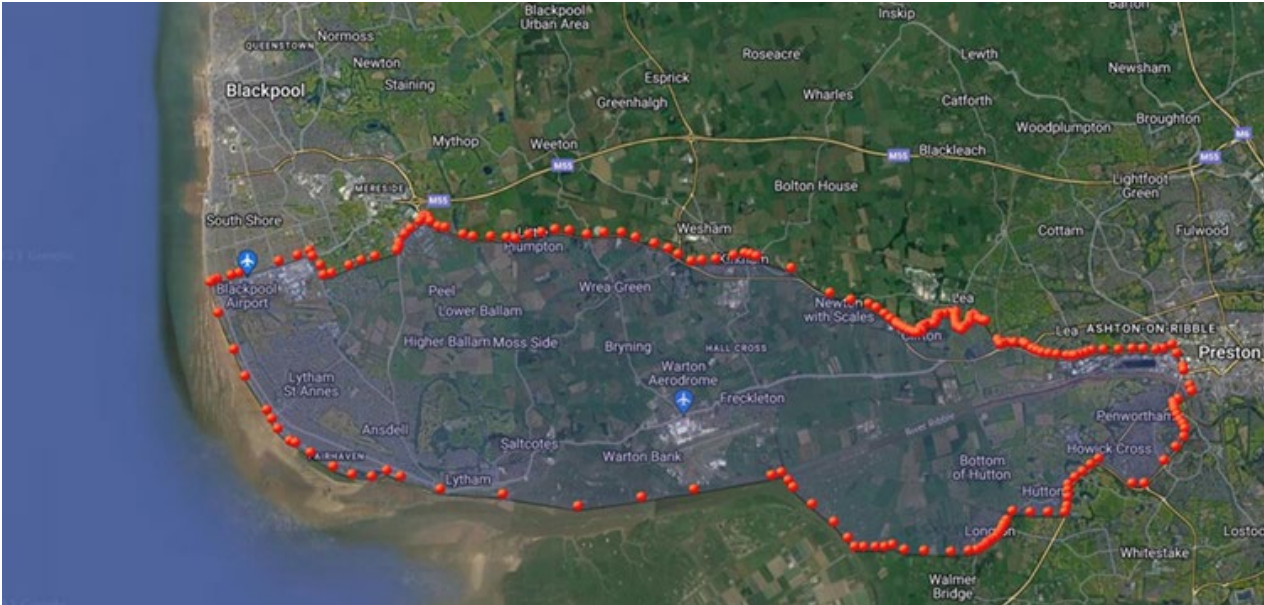


Plate 3.2: Consultation mailing zone (19 April to 4 June 2023)

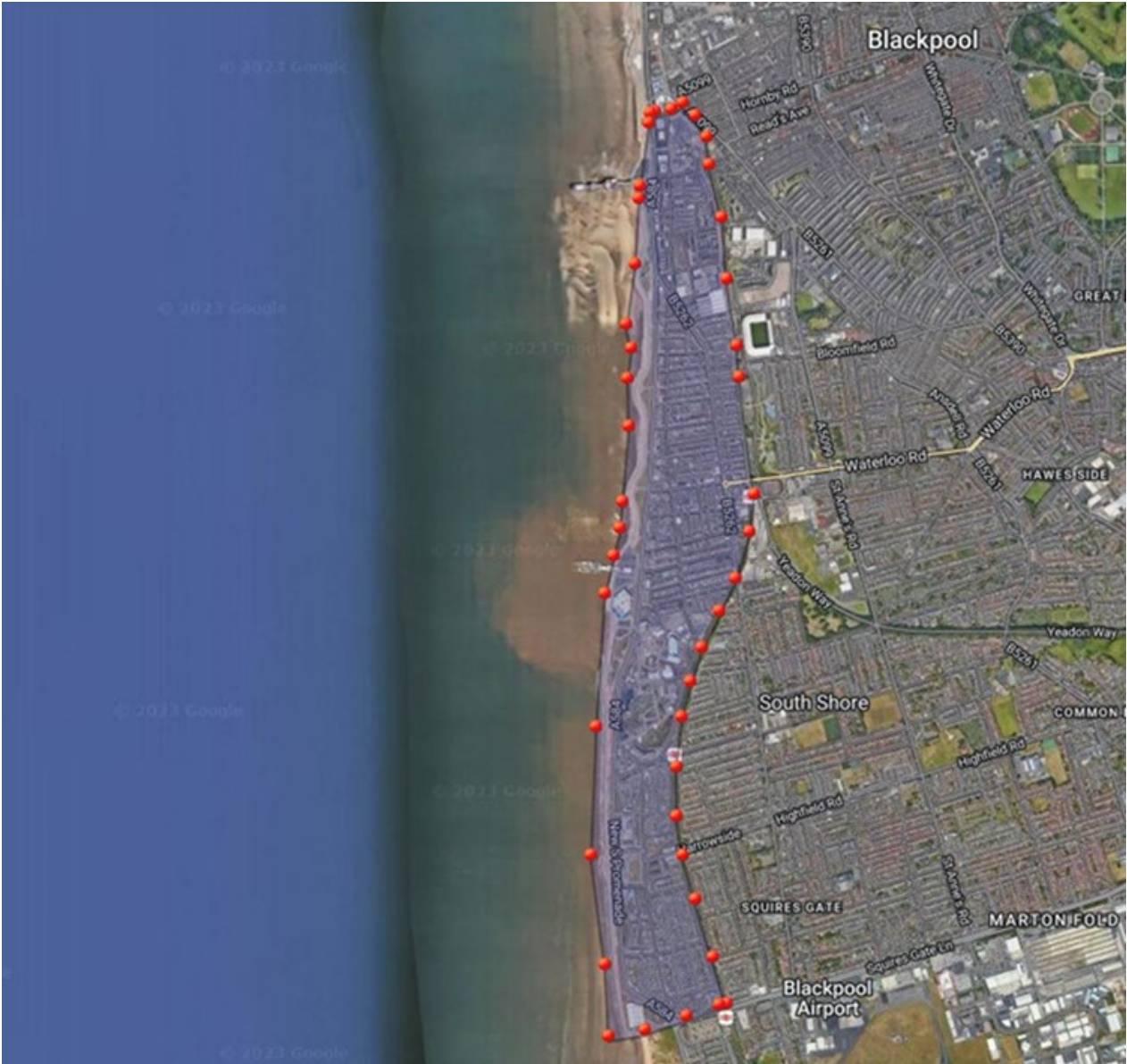


Plate 3.3: Consultation mailing zone (19 April to 4 June 2023) - Blackpool south and coastal

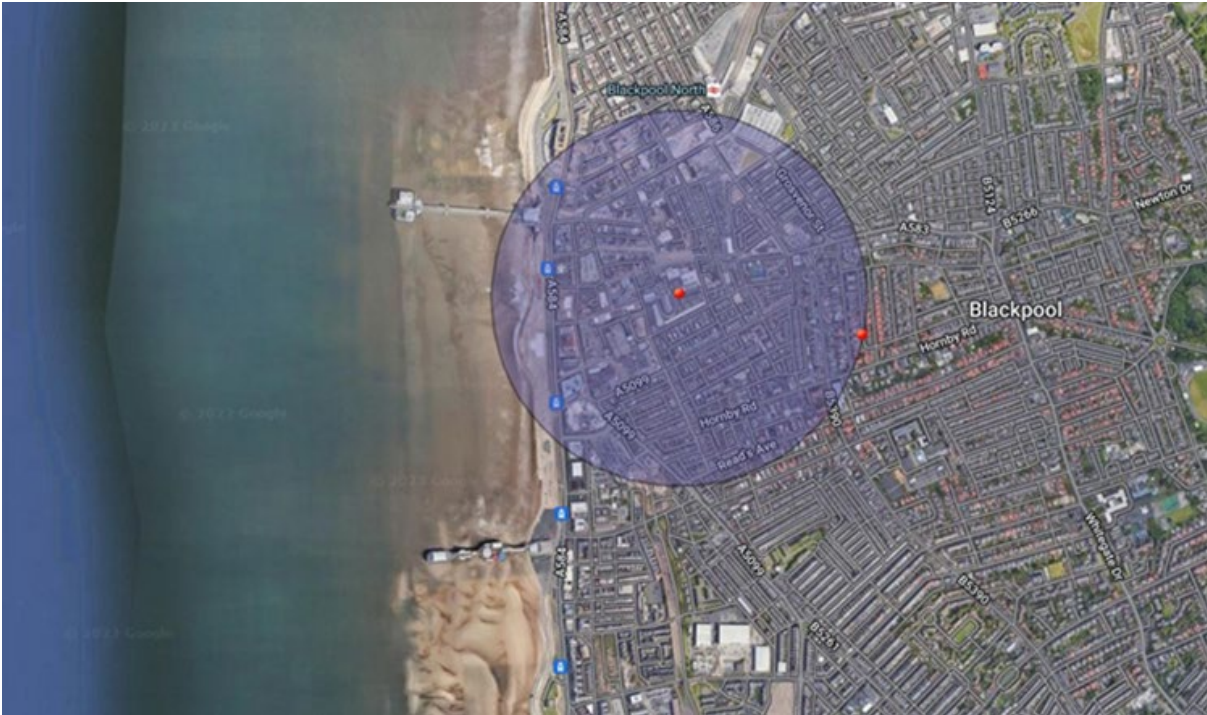


Plate 3.4: Consultation mailing zone (19 April to 4 June 2023) - Blackpool venue



Plate 3.5: Consultation mailing zone (19 April to 4 June 2023) - Southport venue

3.4.2.6 In addition, the Applicants used a commercial service provided by the Isle of Man Post Office to distribute consultation postcards to all 45,811 residential and business addresses on the Isle of Man as shown in **Plate 3.6** below.



Plate 3.6: Consultation mailing zone (19 April to 4 June 2023) - Isle of Man

Consultation materials

3.4.2.7 A website dedicated to the Transmission Assets went live on 19 April 2023 to coincide with consultation launch.⁴ (hereafter referred to as the Transmission Assets website). This could be accessed via the joint website or directly.

3.4.2.8 Information about the consultation was published on the Transmission Assets website covering the following key project areas:

- a project update/summary;
- information on the four indicative search areas for siting the two new substations required for the Transmission Assets as well as the indicative search area for the onshore export cable corridor / grid connection area;
- an explanation of how feedback is used to refine the design;
- details of public events and how to register for the consultation webinar;
- details of how to participate in consultation and provide feedback; and

⁴ <https://morecambeandmorgan.com/transmission/>

- Information regarding supporting the local, regional and national economy.

3.4.2.9 The consultation launched on 19 April 2023, using the following promotional channels.

- Ahead of the consultation launch, posters were sent to 41 businesses and community hubs in England and four locations on the Isle of Man, with covering letters asking the recipients to display them in appropriate locations (Annex E1.4.1, document reference E1.4).
- A promotional postcard, (Annex E1.4.2, document reference E1.4), also including the details of the simultaneous consultations taking place for the statutory consultation of the Generation Assets, was distributed to the consultation mailing zones outline in **Plate 3.2** to **Plate 3.6** above.
- Two media releases were distributed to media outlets (Annex E1.4.3, document reference E1.4); the first on 19 April 2023 announcing the launch of the consultation and explaining how to access consultation content and provide feedback and the second on 23 May 2023 serving as a reminder of the consultation closing soon
- Printed adverts appeared in the Blackpool Gazette, Lancashire Evening Post, Daily Post, Liverpool Echo, Golwg and Isle of Man Courier in the week commencing 17 April 2023 publicising the consultation and advising how individuals could get involved or provide feedback (Annex E1.4.4, document reference E1.4).
- Printed adverts appearing in Blackpool Gazette, Lancashire Evening Post, Daily Post, Liverpool Echo, Golwg and Isle of Man Courier on week commencing 15 May 2023 publicising the consultation and reminding people to provide feedback (Annex E1.4.5, document reference E1.4).
- Digital adverts on the websites of Golwg, Isle of Man Today, Blackpool Gazette, Lancashire Evening Post, Liverpool Echo and Wales Online publicising the consultation and advising how individuals could get involved or provide feedback from 19 April to 4 June 2023 (examples are provided in Annex E1.4.6, document reference E1.4).
- An email was distributed to MPs, local planning authorities, local elected leaders, seldom heard groups, community and business groups in the direct vicinity of the consultation mailing zone on 19 April 2023 to notify them of the launch of consultation (for details of the email and distribution list, see Annex E1.4.7, document reference E1.4).

3.4.2.10 Social media activity was delivered via bp UK's Facebook account and a post on the Twitter (now X as of 23 July 2023) account of bp UK. Two posts were also delivered via Flotation Energy's LinkedIn page; one announcing consultation launch and a consultation closing soon reminder. (Annex E1.4.8, document reference E1.4). The Transmission Assets website was updated for consultation launch, and new content was added (Annex E1.4.9, document reference E1.4). This included the following:

- Information on the four indicative search areas for siting the two new onshore substations required for the Transmission Assets as well as the

indicative search area for the onshore export cable corridor/grid connection area.

- Interactive feedback map showing the four indicative search areas for the two new onshore substations and the indicative search area for the onshore export cable corridor/grid connection area.

3.4.2.11

The consultation materials for this second phase of non-statutory consultation included a consultation brochure and feedback form (Annex E1.4.10 and Annex E1.4.11, document reference E1.4). These were available to download from the Transmission Assets website and available in hard copy, to take away, at consultation events or from the following deposit locations:

- Abbots Vale Community Centre Barrow-in-Furness LA13 9PA.
- Barrow-in-Furness Main Public Library Barrow-in-Furness, Ramsden Square LA14 1LL.
- Preston City Council Town Hall, Lancaster Road, Preston, PR1 2RL.
- Penwortham Town Council and Community Centre, Kingsfold Drive, Penwortham, Preston PR1 9EQ.
- Southport Library Lord Street, Southport PR8 1DJ.
- Egremont Community Centre Egremont Mission, Guildford Street, Wallasey CH44 0BP.
- Ramsey Town Library, Ramsey, Isle of Man IM8 1RT.
- Henry Bloom Library, Douglas, Isle of Man IM1 2AY.

3.4.2.12

Throughout this phase of non-statutory consultation, a Google Ads campaign was used to publicise the consultations taking place. The Applicants geotargeted the advertisements to specific locations close to the export cables, proposed landfall area, the onshore substation area of search and the exhibition venues being used for the consultation events. To increase the effectiveness of the advertisement, the Applicants used two versions: one for consultation launch and one to inform people that consultation would soon be closing (Annex E1.4.12, document reference E1.4).

3.4.2.13

Advertisements were co-placed with Generation Assets Projects. It was decided that, had these Projects not combined their advertising efforts, they would have been advertising at the same time via the same channels to the same audiences. This could have caused confusion and, possibly, consultation fatigue.

3.4.2.14

A joint advertising campaign on Spotify also took place. This advertising campaign was targeted at the areas in which in-person events were being held (Annex E1.4.12, document reference E1.4).

3.4.2.15

Towards the end of the consultation, on 22 May 2023, an email notification was sent to remind consultees that the consultation was closing soon and encouraging people to take part (Annex E1.4.13, document reference E1.4).

Consultation events

3.4.2.16 The consultation was delivered online and in-person, including 12 in-person consultation events. A webinar was also held on 23 May 2023 for those not able to, or who did not wish to, attend the events in person (Annex E1.4.14, document reference E1.4) which is still available to view on the Transmission Assets website. Details of all of the consultation events which took place during this phase of non-statutory consultation are set out in **Table 3.4** below.

Table 3.4: Second phase non-statutory consultation events and attendance

Type	Date	Location	Time	Number of attendees
Exhibition	Wednesday 10 May 2023	Winter Gardens Blackpool 97 Church Street, Blackpool FY1 1HL	3-7pm	5
Pop-Up	Thursday 11 May 2023	Barrow Park Leisure Centre Greengate Street, Barrow-in-Furness LA13 9DT	10am-1pm	17
Exhibition	Friday 12 May 2023	Fylde Rugby Football Club Woodlands Memorial Ground, Blackpool Road, Lytham St Annes FY8 4EL	3-7pm	48
Exhibition	Saturday 13 May 2023	Kingsfold Methodist Church Hawksbury Drive, Kingsfold, Penwortham PR1 9EN	10am-1pm	4
Exhibition	Thursday 18 May 2023	Ramsey Town Hall Parliament Square, Ramsey, Isle of Man IM8 1RT	3-7pm	14
Exhibition	Friday 19 May 2023	Douglas Borough Council Town Hall, Ridgeway Street, Douglas, Isle of Man IM99 1AD	3-7pm	32
Exhibition	Monday 22 May 2023	Hutton Village Hall Moor Lane, Hutton, Preston PR4 5SE	3-7pm	13
Pop-Up	Tuesday 23 May 2023	Affinity Outlet Shopping Lancashire Anchorage Road, Fleetwood FY7 6AE	10am-1pm	25
Online	Tuesday 23 May 2023	Webinar	6-7pm	8
Exhibition	Wednesday 24 May 2023	Royal Clifton Hotel Southport Promenade, Southport PR8 1RB	4-8pm	3
Pop-Up	Wednesday 24 May 2023	Preston Market 28 Market Street, Preston PR1 2AR	10am-1pm	12
Pop-Up	Thursday 25 May 2023	Waitrose & Partners Formby Three Tuns Lane, Formby, Liverpool L37 4AJ	10am-1pm	25
Pop-Up	Thursday 25 May 2023	JunctionONE Retail Park Bidston Moss, Wallasey CH44 2HE	3-6pm	7

3.4.2.17 Hard copies of the consultation brochure and feedback forms to take away were available at all events. At the larger consultation events signage including wobble boards were placed outside advertising that they were

taking place on that day (Annex E1.4.15, document reference E1.4). Separate event panels providing background information and additional context to attendees were provided at consultation events in England and Isle of Man (Annex E1.4.16, document reference E1.4).

Parish Council meeting

- 3.4.2.18 A request was received from the clerk to Newton-with-Clifton Parish Council for the Applicants to attend the council's meeting on Thursday 1 June 2023.
- 3.4.2.19 The Applicants sent a representative to explain the Transmission Assets to the councillors and members of the public that attended the meeting and illustrate the various aspects that were being consulted on. The presentation was followed by a question-and-answer session.

Summary of responses

- 3.4.2.20 A total of 114 pieces of feedback were received and marked as relating to the Transmission Assets Project as a result of the non-statutory consultation period between 19 April and 04 June 2023.
- 49 submitted via feedback forms (both online and hard copy);
 - 51 submitted via email;
 - 11 submitted as map points via online interactive feedback map;
 - 3 submitted via post to the FREEPOST Morecambe and Morgan address.
- 3.4.2.21 The responses provided via email and freepost are summarised below:
- The Applicants received a mixture of positive responses that were supportive of the Project and the need for renewable energy and those that were concerned about the possible impact of the Project on the local area. In particular, the following themes emerged:
- The impact of the required infrastructure on ecology and biodiversity.
 - The impact of the Project on local communities, for example through noise pollution.
 - The visual impact of the infrastructure required for the Project.
 - Community benefits that would come from the Project.
- 3.4.2.22 The responses provided via feedback form (online and physical copy), email and interactive feedback map have been summarised below according to the topics of the questions asked in the non-statutory consultation feedback form. The feedback form questions related solely to the Transmission Assets Project. In total, there were 14 questions, all of which can be found in Annex E1.4.11. Responses to these questions can be summarised as follows:

Question 1: On a scale of one to five, where five is most important and one is least important, how important do you believe each of the following factors should be in deciding on locations for the new substations:

- Environmental impact e.g. flood risk and ecology
- Proximity to homes
- Proximity to roads
- Visual impact
- Cultural heritage

3.4.2.23 Of the 49 respondents that answered this question, the factor that was most commonly rated as ‘five, most important’ was ‘environmental impact e.g. flood risk and ecology’, with 32 respondents choosing this. Therefore, 65% of respondents saw environmental impact as the most important factor when deciding on locations for the two new onshore substations.

3.4.2.24 However, a significant proportion of respondents to this question rated multiple factors as ‘five’ meaning that ‘proximity to homes’ was also rated most important 30 times, or by 61% of respondents.

3.4.2.25 This was followed by ‘visual impact’ and ‘proximity to roads’ which were rated as the most important factor in deciding on locations for the two proposed substations 23 (47%) and 22 (45%) times respectively.

3.4.2.26 Finally, ‘cultural heritage’ was rated as the most important factor 13 (27%) times across the 49 respondents.

Question 2: Are there any other factors which you think are important to consider when we are choosing the preferred locations for our substations?

3.4.2.27 This second phase of non-statutory consultation was aimed at seeking feedback on the onshore substation zones and to obtain local knowledge about the surrounding area.

3.4.2.28 41 of the 49 respondents to complete a feedback form answered this question.

3.4.2.29 The key themes which emerged included, but were not limited to: proximity to neighbouring communities, visual impact of the substations, flood risk, ornithology constraints, and potential impacts on landowners.

Question 3: We will carry out further assessments to help us select the sites where we propose to construct our new substations within the indicative onshore substation search areas.

With reference to indicative onshore substation search area 1, are there any particular features, considerations or mitigation that you think we should consider as we refine our proposals?

3.4.2.30 36 of the 49 respondents to complete a feedback form answered this question. Comments included visual impact, community benefits, impact on wildlife, traffic concerns, potential impacts on neighbouring properties and businesses and ensuring the proposed substations fit with their surroundings.

Question 4: We will carry out further assessments to help us select the sites where we propose to construct our new substations within the indicative onshore substation search areas.

With reference to indicative onshore substation search area 2, are there any particular features, considerations or mitigation that you think we should consider as we refine our proposals?

3.4.2.31 31 of the 49 respondents to complete a feedback form answered this question. Comments focused on visual impact, community benefits, impact on wildlife and ecology.

Question 5: We will carry out further assessments to help us select the sites where we propose to construct our new substations within the indicative onshore substation search areas.

With reference to indicative onshore substation search area 3, are there any particular features, considerations or mitigation that you think we should consider as we refine our proposals?

3.4.2.32 27 of the 49 respondents to complete a feedback form answered this question. Comments addressed visual impact, community benefits, impact on wildlife and traffic concerns.

Question 6: We will carry out further assessments to help us select the sites where we propose to construct our new substations within the indicative onshore substation search areas.

With reference to indicative onshore substation search area 4, are there any particular features, considerations or mitigation that you think we should consider as we refine our proposals?

3.4.2.33 25 of the 49 respondents to complete a feedback form answered this question. Comments focused on visual impact, community benefits, impact on wildlife, traffic concerns and pollution.

Question 7: Is there anything you would like us to consider as we refine our proposals for onshore substations?

3.4.2.34 30 of the 49 respondents to complete a feedback form answered this question. Comments included visual impact, community benefits, impact on wildlife, proximity to Blackpool Airport and local businesses, traffic concerns and impact on the tourism industry in the local area.

Question 8: We have identified an indicative onshore export cable corridor. Within this, we propose to locate our onshore export cables which would connect the indicative proposed project landfall point to the proposed onshore substations.

Are there any particular features, considerations or mitigation that you think we should consider as we refine the indicative onshore export cable corridor for our proposed onshore export cables? Is there anything further you would like us to consider as we refine our proposals?

3.4.2.35 27 of the 49 respondents to complete a feedback form answered this question. Comments addressed traffic concerns, impact of wildlife / ecology, disruption for local people and landowners and proximity of the proposed development to housing.

Question 9: Within the indicative proposed project landfall area, the offshore export cables would be brought ashore before being connected to the onshore export cables.

Are there any particular features, considerations or mitigation within this area that you think we should consider as we refine our proposals?

3.4.2.36 23 of the 49 respondents to complete a feedback form answered this question. Comments included traffic concerns, impact of wildlife / ecology and disruption for local people.

Question 10: The Offshore Transmission Assets Scoping Boundary included the offshore substation platform(s) (OSPs), offshore booster station(s) and the offshore export cables.

Are there any particular features, considerations or mitigation within this area that you think we should consider as we refine our proposals?

3.4.2.37 25 of the 49 respondents to complete a feedback form answered this question. The most common concern raised here was visual impact, although impacts on traffic and local communities were also mentioned.

Question 11: Local knowledge is very important when we develop our plans. Is there anything you would like to make us aware of?

3.4.2.38 31 of the 49 respondents to complete a feedback form answered this question. A significant proportion of these respondents raise concerns about traffic increases in the local area, impact on the local population, the use of greenbelt land and possible impacts on wildlife / ecology.

Question 12: Are there any other considerations you would like to suggest for reducing any impact of the project at this stage?

This can include landscaping, vegetation planting, appearance of substation buildings, wildlife and habitat conservation and the proposed compound and access routes.

3.4.2.39 36 of the 49 respondents to complete a feedback form answered this question, focusing on visual impact and potential impact on local ecology.

Question 13: Is there anything else you would like us to take into account of when developing our proposals?

3.4.2.40 29 of the 49 respondents to complete a feedback form answered this question. The main theme to these responses was impact on the local community but issues including impacts on wildlife and site selection were also raised.

Question 14: Do you have any comments on your experience of this consultation, or things we could have done differently?

3.4.2.41 31 of the 49 respondents to complete a feedback form answered this question. Comments related to preservation of greenbelt land and quality of consultation.

Applicants' response to feedback

3.4.2.42 The Applicants considered all feedback received and had regard to that feedback as the Morgan and Morecambe Offshore Wind Farms: Transmission Assets Project progressed.

3.4.2.43 This feedback informed the formation of the Applicants' PEIR, which was presented during its statutory consultation in the Autumn of 2023. The key changes made to the Project between these non-statutory and statutory stages are outlined below.

Onshore export cable corridor

3.4.2.44 The scoping boundary established in 2022 encompassed a broad area to accommodate subsequent refinement of the onshore cable corridor route. This was refined for this phase of consultation, where a 120m wide onshore export cable corridor was presented.

3.4.2.45 Based on the feedback received to this consultation, as well as constraints mapping and engineering feasibility, this 120m wide onshore export cable corridor was further refined running east from landfall towards the National Grid substation at Penwortham.

3.4.2.46 This included refinements to the areas around Blackpool Airport and the Queensway Farmland Conservation Area, which prompted the Applicants to present two options for the onshore export cable corridor here, one bisecting the conservation area and the other avoiding it entirely.

400 kV export cable corridor

3.4.2.47 The 400 kV grid connection area remained broad due to various constraints which were under consideration at this time. Including, but not limited to, the presence of other developments (e.g. solar farms), utilities, historic landfill and ground conditions.

3.4.2.48 At this point in the consultation process, the site selection process was therefore ongoing, including consideration of these constraints, alongside the environmental designations at the River Ribble and consultation feedback received.

Onshore substations

3.4.2.49 During this phase of non-statutory consultation, the Applicants presented four search areas in which the two proposed substations could be sited.

3.4.2.50 Based on the feedback received, alongside further technical work, the Applicants narrowed down the four onshore substation search areas presented during the second phase of non-statutory consultation to one onshore substation statutory consultation area. The site selection process for the onshore substations considered areas beyond a 150 m buffer from residential properties, those at lower flood risk, and areas with fewer or absence of protected habitats.

3.4.2.51 In addition to the feedback received, this decision was also made based on factors such as topography, proximity to other developments or utilities, road access, community (distance from residential properties), ecology / biodiversity, landscape, flood risk, quality of agricultural land and potential impacts on landowners/occupiers.

3.4.2.52 A further site selection exercise was undertaken to identify appropriate parcels of land within the onshore substation statutory consultation area that could potentially accommodate the onshore substations.

Landfall

3.4.2.53 Of the six potential points of interconnection for landfall initially identified, those locations south of the Ribble Estuary were primarily discounted due to the number of sensitive designations potentially impacted by construction of the Transmission Assets where avoiding these features presented significant human, environmental and engineering challenges.

3.4.2.54 A location between Blackpool and Lytham St Annes was presented at the Applicant's non-statutory consultation as the only shortlisted landfall option and was therefore presented in its PEIR at statutory consultation in Autumn 2023.

Offshore export cable corridor

3.4.2.55 An initial list of five potential cable corridor options were identified by the Applicants, which were reduced to one presented in the Applicants' PEIR following engineering, environmental and human constraints.

3.5 Landowner engagement

3.5.1.1 Dalcour Maclaren has been appointed by the Applicants to undertake land agency work, including land referencing, managing communications with landowners and PWILs, and arranging access to land as required.

- 3.5.1.2 The Applicants commissioned Dalcour Maclaren to complete a search through His Majesty's Land Registry (HMLR) to identify affected parties within the Transmission Assets Scoping Boundary. Through the process of title interrogation of all the registered title and official documents, Dalcour Maclaren identified PWILs (as set out within section 44 of the Planning Act 2008, see **section 4.2.2** of this report).
- 3.5.1.3 To confirm the details obtained through desktop research, Landowner Questionnaires (LOQ) were issued to PWILs to introduce the Project and for them to confirm, deny or amend their interest, as well as providing any additional information the Applicants should be aware of in relation to land interests. LOQs were initially issued in July 2022 (Annex E1.5.1, document reference E1.5) and where new interests were subsequently identified, a LOQ was issued to the new PWIL. Where no response was received to the initial LOQ, these were followed up with reminder letters, phone calls, emails or the offer of a site meeting.
- 3.5.1.4 Where land within the Transmission Assets Scoping Boundary was unregistered with HMLR, notices were put up around the area, on or as close to the location of the unregistered parcel in an attempt to identify anyone with an interest in the unregistered parcel. Dalcour Maclaren erected 203 site notices, which were checked once every week for a period of six weeks following erection to check if it required replacement if damaged or removed. An example notice and map of the notice locations is shown in Annex E1.5.2 (document reference E1.5). A record was kept of each visit and recorded by photograph each time (Annex E1.5.3, document reference E1.5). Dalcour Maclaren also attempted to identify any interests in the unregistered parcels through utilising public sources of information, issuing LOQs to adjacent PWILs (Annex E1.5.4, document reference E1.5), site visits and discussions with neighbours.
- 3.5.1.5 Following the issue of LOQs, non-intrusive survey access licences were distributed in September 2022 (Annex E1.5.5, document reference) to landowning PWILs to request voluntary agreement for non-intrusive survey access for the Applicants to undertake relevant ecological, engineering, topographical, hydrological and geophysical surveys, alongside viewpoint photography where relevant. The issue of LOQs and licences was an iterative process with documentation issued to new landowning PWILs as they were identified. Where access was not agreed through voluntary licence or informal agreement, access was obtained through section 172 of the Housing and Planning Act 2016.
- 3.5.1.6 During the initial phase of non-statutory consultation (see **section 3.4.1** of this report) Dalcour Maclaren wrote to landowning and occupying PWILs on 10 November 2022 to confirm the non-statutory consultation period and events (Annex E1.5.6, document reference E1.5). Dalcour Maclaren also wrote to PWILs on 19 December 2022 (Annex E1.5.6, document reference E1.5) to confirm the consultation had closed and the feedback received was being considered ahead of statutory consultation planned for 2023. The letter also invited land owning and occupying PWILs to provide feedback or have a meeting if they were unable to attend any of the consultation events.

- 3.5.1.7 Between January 2023 and April 2023, land owning and occupying PWILs within the Transmission Assets Scoping Boundary were offered a meeting to discuss the Transmission Assets and to provide feedback ahead of statutory consultation (Annex E1.5.7, document reference E1.5). Thirty-seven land owning and occupying PWILs accepted a meeting. During these meetings, information was gathered to better understand the land, the use, occupation and future development plans and features. The outcomes of these meetings were recorded and fed back to the Applicants via Dalcour Maclaren.
- 3.5.1.8 During the second phase of non-statutory consultation (see **section 3.4.2** of this report), Dalcour Maclaren wrote to land owning and occupying PWILs on 18 April 2023 to confirm the non-statutory event period and consultation event dates and locations (Annex E1.5.7, document reference E1.5).

3.6 Environmental Impact Assessment - scoping

- 3.6.1.1 In parallel with the first phase of non-statutory consultation, in October 2022, the Applicants submitted an EIA Scoping Report to the Planning Inspectorate. This described the scope and methodology for the technical studies being undertaken to provide an assessment of any likely significant effects for the Transmission Assets (Morgan OWL and Morecambe OWL, 2022). It also described those topics or sub-topics proposed to be scoped out of the EIA process and provided justification as to why the Transmission Assets would not have the potential to give rise to likely significant effects in these topic areas.
- 3.6.1.2 Following consultation with the statutory bodies, the Planning Inspectorate (on behalf of the Secretary of State) provided a Scoping Opinion on 8 December 2022 (Planning Inspectorate, 2022).
- 3.6.1.3 Further details can be found in **section 4.6** of this report and Volume 1 Chapter 5: EIA methodology of the ES (document reference F1.5).

3.7 The Evidence Plan Process, engagement forums and technical consultation

3.7.1 Evidence Plan Process

- 3.7.1.1 Following scoping, engagement has continued throughout the EIA process in order to facilitate proportionate EIA and the iterative design process.
- 3.7.1.2 A key part of this engagement has included the Evidence Plan Process (EPP). The EPP was initially developed by the Major Infrastructure Environment Unit of the Department for Environment, Food and Rural Affairs. It aimed to provide a formal mechanism for applicants and statutory bodies to agree what information and evidence should be submitted in support of an application for development consent. As such, the EPP is a part of the pre-application stage of the development consent process.
- 3.7.1.3 The EPP is voluntary. The output of the process is recorded in an Evidence Plan document, which is a non-legally binding agreement between the Applicants and relevant stakeholders.

3.7.1.4 The EPP was initially used by applicants to ensure compliance with the Habitats Regulations. The process is now increasingly applied to broader EIA matters, as well as the Marine Conservation Zone Assessment process.

3.7.1.5 The process records the key areas of agreement and any outstanding areas of disagreement between the relevant participants. This will ultimately form the basis of Statements of Common Ground which will start to be prepared during the pre-examination stage and updated, as required, through the examination .

3.7.2 EPP steering group

3.7.2.1 In developing the Evidence Plan for the Transmission Assets, stakeholder engagement and input is of fundamental importance. The development and monitoring of the Evidence Plan and its subsequent progress has been through the EPP Steering Group. The EPP Steering Group includes the following:

- the Applicants and their EIA consultants;
- the Planning Inspectorate;
- Natural England;
- the Marine Management Organisation (MMO)
- Historic England;
- Blackpool Council;
- Fylde Council;
- Preston City Council;
- South Ribble Borough Council; and
- Lancashire County Council.

3.7.2.2 These participants were invited as the key regulatory and statutory nature conservation bodies.

3.7.2.3 The EPP Steering Group has overseen the development and monitoring of the Evidence Plan and its subsequent progress. They first met at the start of the EPP in January 2023 and have continued to meet during the EIA process. Full details of the Steering Group remit and meeting details are set out in the Technical Engagement Plan (TEP) (document reference E5).

3.7.3 Expert Working Groups

3.7.3.1 In addition, Expert Working Groups (EWGs) have been set up to discuss topic specific areas with the relevant stakeholders. EWG meetings have been held regularly throughout the EPP since Q1 2023 to provide the opportunity for stakeholders to give feedback and advice to inform the EIA and HRA processes, as well as site selection and project development and refinement. The process has been iterative, and each group has worked through the discussion points and to reach agreement, as far as possible, during the pre-application stage. Full details are set out in the TEP (document reference E5).

3.7.3.2 The structure for the EPP (including EPP Steering Group and EWGs) is shown in **Plate 3.7**.

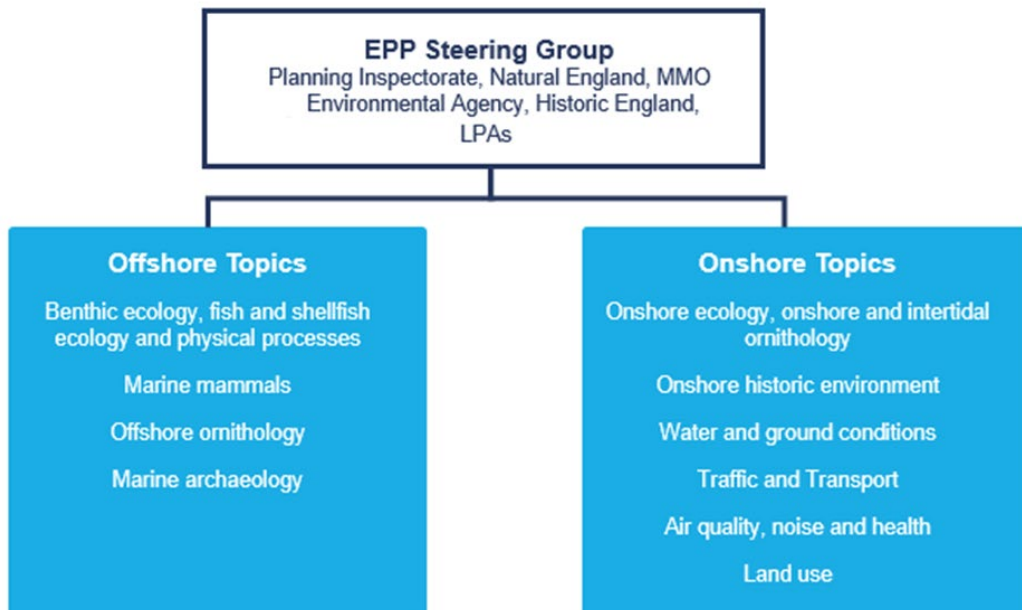


Plate 3.7: Transmission Assets EPP Steering Group and EWGs

3.7.3.3 Details of participants of the EWG, by topic, are provided in **Table 3.5**.

Table 3.5: EWGs and the participants

Expert Working Group	Participants
Benthic ecology, fish and shellfish and physical processes	Natural England MMO Cefas Joint Nature Conservation Committee (JNCC - defers to Natural England) Environment Agency The Wildlife Trusts
Marine mammals	Natural England JNCC (defers to Natural England) MMO Cefas The Wildlife Trusts
Offshore ornithology	Natural England JNCC (defers to Natural England) MMO The Wildlife Trusts Royal Society for the Protection of Birds (RSPB)
Marine archaeology	Historic England MMO

Expert Working Group	Participants
Onshore ecology, onshore and intertidal ornithology	Natural England Environment Agency Preston City Council Fylde Council South Ribble Borough Council Blackpool Council Lancashire County Council RSPB The Wildlife Trusts
Onshore historic environment	Historic England Lancashire County Council (County Archaeologist or representatives) Fylde Council
Water and ground conditions	Environment Agency Lancashire County Council (as Lead Local Flood Authority) Blackpool Council (as Lead Local Flood Authority)
Traffic and transport	Lancashire County Council (Highways Authority) National Highways Blackpool Council South Ribble Borough Council Preston City Council
Air quality, noise and health	Preston City Council Fylde Council South Ribble Borough Council Blackpool Council
Land use	Lancashire County Council Natural England Targeted consultation with Lancashire Enterprise Partnership

3.7.4 Technical engagement and engagement forums

3.7.4.1 In addition to the above, meetings on other topics, such as landscape and visual assessment, have been held with key stakeholders where required (such as to agree viewpoints for assessment). This includes a MNEF, held jointly with Generation Assets Projects, as well as liaison with commercial fishery interests.

Marine Navigation Engagement Forum

3.7.4.2 The objectives of the MNEF were to provide a platform for the exchange of information, knowledge and experience, allowing marine developers and relevant shipping and navigation stakeholders to co-exist in the marine environment. The overarching strategy was to establish and actively maintain a structured basis by which the Project and relevant shipping and navigation

stakeholders engage with each other and share information, evidence and feedback.

Archaeology and Heritage Engagement Forum - offshore

- 3.7.4.3 The Archaeology and Heritage Engagement Forum (AHEF) – offshore aimed to address offshore archaeology and heritage issues early in the pre-application process, streamlining these decisions whilst also focussing on the evidence requirements which aim to be proportionate to the potential impacts. The overall aim of the forum was to ensure that impacts of offshore archaeology and heritage were identified, reduced, assessed and mitigated.

Archaeology and Heritage Engagement Forum – onshore

- 3.7.4.4 The AHEF – onshore aimed to address and decide upon onshore archaeology and heritage issues early in the pre-application process, streamlining these decisions whilst also focussing on the evidence requirements which aim to be proportionate to the potential impacts. The overall aim of the forum was to ensure that impacts of onshore archaeology and heritage were identified, reduced, assessed and mitigated.

Landscape and visual

- 3.7.4.5 Meetings were held, as required, with key consultees to agree the scope of the landscape and visual assessment and the approach to the assessment of seascape effects (particularly following removal of the OSPs and Morgan offshore booster station from the application). The meetings were also used to agree viewpoints for assessment.
- 3.7.4.6 Full details of the Engagement Forums participants and meetings are set out in the TEP (document reference E5).

3.7.5 Other technical consultation

- 3.7.5.1 Technical engagement has also taken place with stakeholders relating to the following topics:
- commercial fisheries;
 - seascape, landscape and visual resources;
 - socio-economics.
- 3.7.5.2 Full details of discussions held are set out in full in the TEP (document reference E5).

4 Statutory consultation

4.1 The SoCC and consultation under section 47 of the Planning Act 2008 (12 October to 23 November 2023)

4.1.1 Introduction

4.1.1.1 As required by section 47 of the Planning Act 2008, the Applicants conducted statutory consultation to engage local community consultees early in the development of the Transmission Assets. A SoCC was prepared outlining the Applicants' approach to community consultation (Annex E1.6.1, document reference E1.6).

4.1.2 Legislative context

4.1.2.1 Section 47 of the Planning Act 2008 places a duty on an applicant to consult the local community in the following manner:

'(1) The applicant must prepare a statement setting out how the applicant proposes to consult, about the proposed application, people living in the vicinity of the land.

(2) Before preparing the statement, the applicant must consult each local authority that is within section 43(1) about what is to be in the statement.

(3) The deadline for the receipt by the applicant of the local authority's response to consultation under subsection (2) is the end of the period of 28 days that begins with the day after the day on which the local authority receives the consultation documents.

(4) In subsection (3) "the consultation documents" means the documents supplied to the local authority by the application for the purpose of consulting the local authority under subsection (2).

(5) In preparing the statement, the applicant must have regard to any response to consultation under subsection (2) that is received by the applicant before the deadline imposed by subsection (3)

(6) Once the applicant has prepared the statement, the application must -

(za) make the statement available for inspection by the public in a way that is reasonably convenient for people living in the vicinity of the land

Publish in a newspaper circulating in the vicinity of the land, a notice stating where and when the statement can be inspected, and

Publish the statement in such manner as may be prescribed

(7) The applicant must carry out consultation in accordance with the proposals set out in the statement.'

4.1.2.2 For the purposes of section 47(1) of the Planning Act 2008, the statement setting how an applicant '*proposes to consult, about the proposed application, people living in the vicinity of the land*' is known as the SoCC. In respect of subsection (2), a draft SoCC must be provided to the local

authority, providing information which allows the authority to make an informed response to the draft SoCC consultation.

- 4.1.2.3 Section 47(5) of the Planning Act 2008 requires an applicant to have regard to any response that is received within a 28 day period.
- 4.1.2.4 In developing the SoCC, regard must be had to the 2017 EIA Regulations and relevant guidance about pre-application procedures. Regulation 12 of the 2017 EIA Regulations stipulates that the SoCC must set out whether the proposal is EIA development and, if so, how the applicant intends to publicise and consult on the PEIR.
- 4.1.2.5 The former DCLG (now the Department for Levelling Up, Housing and Communities) guidance on the pre-application process (DCLG, 2015), gives further guidance at paragraph 57 on the SoCC, including that the document should be made available online and at any exhibitions or other events held by applicants. It should also be placed at appropriate local deposit points (e.g., libraries, council offices) and sent to local community groups as may be appropriate.
- 4.1.2.6 Information about the consultations conducted on the draft SoCC with local authorities ahead of its publication, as required by section 47(2) of the Planning Act 2008, can be found in **section 4.1.3** and **Table 4.1** of this report. This includes details of how feedback was considered.
- 4.1.2.7 Details of how the Applicants complied with the legislative requirements and guidance regarding the SoCC are set out in the overarching Consultation Compliance Checklist (Annex E1.2.1, document reference E1.2). Details of how the Applicants complied with commitments made within the SoCC are set out in **Table 4.9** below.

4.1.3 Preparation of the SoCC

- 4.1.3.1 As set out in the Planning Inspectorate Advice Note 14 (Planning Inspectorate, 2021), the Consultation Report should provide evidence of how an applicant has complied with the SoCC preparation process. The note also advises that evidence should be submitted which shows which local authorities were consulted about the content of the draft SoCC, the comments were received from local authorities, confirmation that local authorities were given 28 days' notice to provide comments, and a description of how an applicant has had regard to comments received.
- 4.1.3.2 Section 47(2) of the Planning Act 2008 states that, before preparing a SoCC, an applicant must consult with each local authority that is within section 43(1) on what is to be in the statement, for a period of 28 days (section 47(3)).
- 4.1.3.3 The draft SoCC (Annex E1.6.2, document reference E1.6) was the subject of a formal consultation with local authorities which was undertaken from 21 July to 21 August 2023, allowing 29 days for local authorities to provide their comments (commencing on Monday 24 July 2023).
- 4.1.3.4 Based on the extent of the onshore and intertidal elements of the Transmission Assets, the Applicants identified six host local authorities (as defined in section 43(b) of the Planning Act 2008) (see **section 4.2.2** of this report for further details) which it had a duty to consult on the draft SoCC:

- Fylde Council;
- Preston City Council;
- South Ribble Borough Council;
- Blackpool Council;
- Lancashire County Council; and
- West Lancashire Borough Council.

4.1.3.5

In line with section 47(5) of the Planning Act 2008, the Applicants had regard to the responses received from the local authorities in the finalisation of the SoCC. **Table 4.1** below sets out the responses and regard received.

Table 4.1: Responses to consultation on draft SoCC

Local planning authority	Response to SoCC consultation	Date received	Response from Applicants	Action taken following comments
Fylde Council	<p><i>'I have had a look through the SOCG and website. Both of these are very professional in their appearance, layout and content and so will be helpful to those who take the time to review the scheme. I appreciate that they need to set the scene for why the transmission assets are needed, but I wonder if there is a need to provide something that makes it really clear that the transmission assets element will involve some large infrastructure and significant levels of disturbance during the construction of that and the cable laying. The references to 'transmission assets' seems to underplay the impacts that these could have.</i></p> <p><i>Prior to undertaking any consultation I think it would be really helpful if you could undertake a collective briefing session with the Fylde Council politicians. The route will impact the parts of the borough with the largest population and so there is a growing level of political interest in the project. Can this be arranged as a priority please. I can assist with contact details at Fylde Council for this if you are agreeable to it.</i></p> <p><i>One issue with the consultation material is that it relies on maps that are small and do not have much detail on them. It would be better if these were much larger and on an OS base so residents and other interested parties can identify the search areas easily.</i></p> <p><i>The main impacts will be in your search areas 1 and 2. This directly impacts the Parishes of Warton, Freckleton, Newton-with-Scales (which covers Newton village and Clifton village). I suggest you have direct contact with the Parishes here via their Clerks. Public events would be helpful in these</i></p>	21 August 2023	<p><i>'Thank you for your email below and for Fylde Council's response to our consultation on the Statement of Community Consultation (SoCC) for the upcoming statutory consultation on the Morgan and Morecambe Offshore Wind Farms: Transmission Assets project.</i></p> <p><i>We would like to assure you that while the SoCC has been designed to offer details of our approach to consultation, it is only one element of our consultation materials. As outlined in the SoCC, it is our intention to publish a brochure, website content and other materials at the start of consultation which are being designed to cover the additional subject matter you suggest. We will certainly take on board this feedback during the drafting process.</i></p> <p><i>Thank you also for your suggestion of providing a briefing session for Fylde Council politicians. Since you provided your feedback, as you know we held sessions for local politicians on 8 and 15 September to provide them with key updates on the project since the close of our second non-statutory consultation in June. Since then, we have also issued an update on our plans for consultation. We are hoping to hold a further session at the start of the statutory consultation period to which we will be inviting Fylde Council politicians in due course. We would appreciate it if you could provide contact</i></p>	<ul style="list-style-type: none"> • The Applicants published a brochure, feedback form and PEIR during its statutory consultation on the Transmission Assets website. • The Applicants held briefing sessions for local politicians on 8 and 15 September 2023. • The Applicants held a briefing session for local politicians at the start of statutory consultation on 13 October at Lytham Assembly Rooms. • The Applicants provided mapping with an Ordnance Survey base during its statutory consultation. • The Applicants held an event at Newton, Salwick and Clifton Village Hall. • The Applicants used the following Lancashire libraries as deposit locations: Kirkham Library, Freckleton Library, Ansdell Library, Penwortham Town Council and Community

Local planning authority	Response to SoCC consultation	Date received	Response from Applicants	Action taken following comments
	<p><i>locations, perhaps at Newton Village hall, Warton Village Hall or the Bridges Playing Field facility, and Freckleton library or the Bush Lane sports pavilion. The Clerks may be best placed to suggest which is most useful for these. These may be useful deposit locations alongside the various libraries.</i></p> <p><i>Events should also be held in St Annes and Lytham given the routeing, and potentially in Kirkham also as the search area skirts that community.</i></p> <p><i>One of the main impacts will be on the ecology of the area and so Fylde Bird Club would be a useful contact for this given the international birdlife importance of the estuary and the impacts that the routeing will have on that. I expect that the local ramblers group would be interested in the implications around the use of public footpaths during construction. The land is largely in agricultural production so the NFU would be a useful contact to reach out to landowners.</i></p> <p><i>Apologies for the delayed and slightly random nature of the comments, but I hope they assist nonetheless. Please come back to me if you want any clarifications.'</i></p>		<p><i>details for relevant officers at Fylde Council, who can, in turn, help us reach relevant councillors ahead of this session.</i></p> <p><i>Thank you for your suggestion of providing detailed mapping over an Ordnance Survey base. We did provide this at our last non-statutory consultation events, and it proved very popular among those who attended. We are hoping to develop similar mapping in time for the launch of this statutory consultation, and an updated more detailed map (using Ordnance Survey as the base) will also be provided on our website.</i></p> <p><i>We are grateful for your advice on consultation event locations and will certainly bear these in mind when designing our events programme. We are already in touch with the clerks of Newton-with-Clifton Parish and Freckleton Parish Councils ahead of our upcoming briefing sessions. We are also in contact with Lancashire County Council regarding the use of local libraries as deposit locations. The locations for our statutory consultation events have now been published on our website and will be confirmed in the published SoCC.</i></p> <p><i>Thank you for your suggestions on local organisations who may be interested in our consultation. We will ensure that we contact these groups at consultation launch.'</i></p>	<p>Centre, Lytham Library, St Annes Library.</p> <ul style="list-style-type: none"> The Applicants contacted a range of hard to reach groups at consultation launch.

Local planning authority	Response to SoCC consultation	Date received	Response from Applicants	Action taken following comments
			<p><i>Many thanks again for your feedback. We are grateful to you for taking the time to prepare such a comprehensive response.</i></p>	
<p>South Ribble Borough Council</p>	<p><i>'Firstly, [REDACTED] isn't with us any longer but I believe [REDACTED] (replacement) is on the circulation list.</i></p> <p><i>I've asked our policy team and they have given me a few suggestions re consultation</i></p> <p><i>We usually use the two Penwortham Town Council venues for our events – contact available here</i> <i>Contact - Penwortham Town Council</i></p> <p><i>Other venues that work well in other areas tend to be Church Halls and Leisure Centres if they have smaller rooms, so maybe Penwortham Leisure Centre, but we would avoid doing anything in shops etc – we have tried this before and it doesn't work.</i></p> <p><i>Deposit points – we only do libraries and the Civic Centre, Leyland now. We've tried shops and post offices and again it doesn't work, however Penwortham Town Council are likely to agree to their venues being used as deposit points – [REDACTED] at the Town Council (sorry don't have a surname) is usually very helpful and accommodating.</i></p> <p><i>We have a consultation database with residents, interest groups and statutory consultees. We can provide details of groups and businesses for you to do your own mailout but under GDPR regulations I don't think we can provide the details of individuals. We can organise a mailout internally for these if needed but a little notice would be really appreciated.</i></p> <p><i>With Elected Members we have tried lots of different options – special workshops, special</i></p>	<p>27 July 2023</p>	<p><i>'Thank you for your email and for letting us know that [REDACTED] is no longer with the Council – we have updated our records.</i></p> <p><i>Thanks also for reaching out to your policy team, the information you and the team have provided has been really helpful.</i></p> <p><i>If we would like mailout assistance, are you able to provide a rough guide as to how much notice you would need?</i></p> <p><i>Lastly, I would be grateful if you could confirm whether you have any comments on our proposed Statement of Community Consultation (SoCC), attached. If you have any questions on it, then please do shout.'</i></p>	<ul style="list-style-type: none"> • The Applicants held events at Newton, Salwick and Clifton Village Hall, St Anne's Farmers Market, St Annes Cricket Club, Penwortham Farmers Market, Fylde Rugby Club, William Segar Hodgson Pavilion and Douglas Borough Council. • The Applicants used the following deposit locations: Kirkham Library, Freckleton Library, Ansdell Library, Penwortham Town Council and Community Centre, Lytham Library, St Annes Library.

Local planning authority	Response to SoCC consultation	Date received	Response from Applicants	Action taken following comments
	<p><i>committees, both work OK but there are inevitably several who claim we didn't tell them once they start getting resident complaints – even if they have been at the meetings. We find record keeping worth the effort!</i></p> <p><i>Penwortham tends to be one of the quieter areas when it comes to the LP consultation events we do – they aren't usually very well attended.</i></p> <p><i>We can also ask our comms team to assist if needs be – [REDACTED] has agreed to them being involved and they can be contacted on Communications@southribble.gov.uk or through me.'</i></p>			
South Ribble Borough Council	<p><i>'No comments – looks fine to me, and let me know what you need us to do. The more notice the better I'm sure somehow we can accommodate you'</i></p>	3 August 2023	N/A	N/A
Blackpool Council	<p><i>'Thanks for your email but I think we're happy to defer to you on this.</i></p> <p><i>The Municipal Buildings and Blackpool Central Library could be good deposit points for you. There is a Blackpool Civic Trust that you may wish to consult, and you'll see I've copied in the general Democracy mailbox which would be your point of contact with elected Members. '</i></p>	3 August 2023	<p><i>'Thank you for your email, and for Blackpool Council's response to our consultation on the Statement of Community Consultation (SoCC) for our upcoming statutory consultation on the Morgan and Morecambe Offshore Wind Farms: Transmission Assets project.</i></p> <p><i>We are grateful to you for this feedback, which we will consider as we develop our plans for statutory consultation.</i></p> <p><i>As we develop those plans, we have also considered the feedback we received at our previous non-statutory consultations to select event locations and deposit locations that are near to the onshore elements of the project.</i></p>	<ul style="list-style-type: none"> • The Applicants considered the suggestions for deposit locations in Blackpool, however, selected locations in closer proximity to the Project in Fylde. • The Applicants held events at Newton, Salwick and Clifton Village Hall, St Anne's Farmers Market, St Annes Cricket Club, Penwortham Farmers Market, Fylde Rugby Club, William Segar Hodgson Pavilion and

Local planning authority	Response to SoCC consultation	Date received	Response from Applicants	Action taken following comments
			<p><i>Thank you once again for taking the time to respond to our consultation on this SoCC, which we will be publishing in time for our statutory consultation. We appreciate that both reviewing the content and providing us with a formal response takes time, and we are grateful to you for making time to reply.'</i></p>	<p>Douglas Borough Council.</p>
<p>Lancashire County Council</p>	<p><i>'To discuss the use of libraries as document deposit points in Lancashire please contact [REDACTED] @lancashire.gov.uk'</i></p>	<p>26 July 2023</p>	<p><i>'Thank you for your email, and for Lancashire County Council's response to our consultation on the Statement of Community Consultation (SoCC) for the upcoming statutory consultation on the Morgan and Morecambe Offshore Wind Farms: Transmission Assets project.</i></p> <p><i>We would like to confirm that we are now in contact with relevant officers at Lancashire County Council and that the council has agreed to host documentation at libraries within the consultation zone.</i></p> <p><i>Thank you once again for taking the time to respond to our consultation on this SoCC.'</i></p>	<ul style="list-style-type: none"> The Applicants used the following deposit locations: Kirkham Library, Freckleton Library, Ansdell Library, Penwortham Town Council and Community Centre, Lytham Library, St Annes Library.
<p>West Lancashire Borough Council</p>	<p><i>'Please can you send me a copy of a plan illustrating the indicative proposed locations of any: onshore substation areas, onshore export cable corridor / grid connection area, and the National Grid Connection Point at Penwortham substation and any associated temporary compound areas. Effectively, this is the information that was shared at the non-statutory consultation that was purported to</i></p>	<p>7 August 2023</p>	<p><i>'Thank you for your email. The materials from our second non-statutory consultation which include the indicative onshore substation search areas, indicative onshore export cable corridor and indicative onshore grid connection areas are available through our non-</i></p>	<ul style="list-style-type: none"> The Applicants provided the most up to date information available during each round of consultation.

Local planning authority	Response to SoCC consultation	Date received	Response from Applicants	Action taken following comments
	<p><i>have occurred in Spring 2023 (see para. 6.2 of the draft Statement of Community Consultation).</i></p> <p><i>This information will help us inform you of any relevant stakeholder groups.</i></p> <p><i>We will be looking at providing a more comprehensive response prior to the statutory deadline of 21 August 2023.'</i></p>		<p><i>statutory consultation brochure on our website, which can be accessed here.</i></p> <p><i>The onshore route is subject to ongoing refinement, and so the final red line boundary for statutory consultation is likely to differ in places. However, the map in the aforementioned brochure is considered to be representative.</i></p> <p><i>We look forward to your further response to our statement of community consultation.</i></p> <p><i>If you would like to discuss this further please let us know.'</i></p>	
West Lancashire Borough Council	<p><i>'Thank you for consulting West Lancashire Borough Council on the draft Statement of Community Consultation (SoCC) for the Morgan and Morecambe Offshore Wind Farms: Transmission Assets in accordance with Section 47(2) of the Planning Act 2008.</i></p> <p><i>Having reviewed the project in more detail, we consider that the proposal will primarily affect the Parishes of North Meols, Hesketh-with-Becconsall, and Tarleton. This informs our advice on suggested locations for venues, deposit locations and stakeholder groups. In general, we have no significant concerns with the content of the draft SoCC. With regards to your suggested areas that we can comment on, our comments are as follows:</i></p>	18 August 2023	<p><i>'Thank you for your email, and for West Lancashire Borough Council's response to our consultation on the Statement of Community Consultation (SoCC) for our upcoming statutory consultation on the Morgan and Morecambe Offshore Wind Farms: Transmission Assets project.</i></p> <p><i>We are grateful to you for this feedback, which we will consider as we develop our plans for our statutory consultation.</i></p> <p><i>As we develop those plans, we have also considered the feedback we received at our previous non-statutory consultations to select event locations and deposit</i></p>	<ul style="list-style-type: none"> • The Applicants held events at Newton, Salwick and Clifton Village Hall, St Anne's Farmers Market, St Annes Cricket Club, Penwortham Farmers Market, Fylde Rugby Club, William Segar Hodgson Pavilion and Douglas Borough Council. • The Applicants used the following deposit locations: Kirkham Library, Freckleton Library, Ansdell Library, Penwortham Town

Local planning authority	Response to SoCC consultation	Date received	Response from Applicants	Action taken following comments
	<p><i>Venues</i></p> <p><i>It is noted in the draft SoCC and the former consultation event material that events have been held at a range of accessible public locations. There is the Hub @ Banks (in North Meols Parish) and Hesketh Bank Community Centre (in Hesketh-with-Beaconsall). Tarleton is further south but Tarleton and Hesketh Bank are well connected so it may not be necessary to look for a possible venue in Tarleton. There is also a Booths at Hesketh Bank which may be suitable to host consultation material as a venue, as an alternative to a community building.</i></p> <p><i>Deposit locations</i></p> <p><i>Depositing material at local libraries would generally conform with the Council's own Statement of Community Involvement and therefore be considered good practice. Therefore, it is requested that a copy of the consultation material is deposited at: Tarleton Library and Ormskirk Library. Given that the proposal is located adjacent to the northern Parishes of the Borough, Tarleton Library would be relevant, and Ormskirk Library is centrally located in the Borough.</i></p> <p><i>If it is not already required by legislation, we politely request that a copy of the consultation material is also deposited at the main Council Offices at 52 Derby Street in Ormskirk.</i></p> <p><i>Stakeholder Groups</i></p> <p><i>There are five stakeholder groups that may be of relevance that are not already consulted:</i></p> <p><i>RSPB – wildlife@rspb.org.uk</i></p> <p><i>RSPB Hesketh out Marsh, Dib Rd, Hesketh Bank, PR4 6XQ Ribble.reserves@rspb.org.uk</i></p>		<p><i>locations that are near to the onshore elements of the project.</i></p> <p><i>Thank you once again for taking the time to respond to our consultation on this SoCC, which we will be publishing in time for our statutory consultation.</i></p> <p><i>We appreciate that both reviewing the content and providing us with a formal response takes time, and we are grateful to you for making time to reply.'</i></p>	<p>Council and Community Centre, Lytham Library, St Annes Library.</p> <ul style="list-style-type: none"> The Applicants contacted the representatives from the suggested stakeholder groups as part of the section 47 consultation process.

Local planning authority	Response to SoCC consultation	Date received	Response from Applicants	Action taken following comments
	<p><i>Ribble Rivers Trust ; Ribble Rivers Trust c/o Hanson Cement Ribblesdale Works, West Bradford Road, Clitheroe, BB7 4QF. Or info@ribbletrust.com .</i></p> <p><i>Lancashire Wildlife Trust info@lancswt.org.uk</i></p> <p><i>National Farmers Union – [REDACTED]@nfu.org.uk [REDACTED] is the North West Environment Advisor and is involved with farmers in the Crossens catchment.</i></p> <p><i>Working with you and Shared Learning</i></p> <p><i>Unfortunately, due to time and resource constraints we have not had the opportunity to speak with colleagues in our Communications team on this matter. However, as part of effective, on-going co-operation we wish to continue engaging with yourselves outside of the consultation period to share contact details of relevant Officers at the Council. This is in recognition that in your correspondence you state that you will provide us with an update ahead of the publication of the SoCC and consider any suggestions you have about these elements prior to publication.</i></p> <p><i>If you have any questions or require further clarification, please do not hesitate to get in touch with me.'</i></p>			

4.1.4 Publication of Statement of Community Consultation

- 4.1.4.1 As required by section 47(6) of the Planning Act 2008, the published SoCC (Annex E1.6.1, document reference E1.6) was made available for inspection by the public.
- 4.1.4.2 Copies of the SoCC were available to view from 5 October to 23 November 2023 at the following locations:
- Freckleton Library, Preston Old Road, Freckleton, PR4 1PB;
 - Kirkham Library, Station Road, Kirkham, PR4 2HD;
 - St Annes Library, 254 Clifton Drive South, Lytham St Annes, FY8 1NR;
 - Lytham Library, Dicconson Terrace, Lytham St Annes, FY8 5JY;
 - Ansdell Library, 59 Commonside, Ansdell, Lytham St Annes, FY8 4DJ;
 - Penwortham Town Council and Community Centre, Kingsfold Drive, Penwortham, Preston, PR1 9EQ; and
 - Henry Bloom Noble Library, 8 Duke Street, Douglas, Isle of Man, IM1 2AY.
- 4.1.4.3 Newspaper notices (statutory section 47 notices) were published stating where and when the SoCC could be inspected. These appeared in the Blackpool Gazette, Lytham St Annes Express and Lancashire Evening Post on 5 October 2023 and the Isle of Man Courier on 6 October 2023. Copies of these notices as they appeared in print are available in Annex E1.6.3 (document reference E1.6).
- 4.1.4.4 The SoCC was available in hard copy at deposit locations throughout the statutory consultation (see **section 4.1.8** of this report) The SoCC was also made available on the Transmission Assets website on 5 October 2023 and remains available to view today.

4.1.5 Defining the consultation mailing zone

- 4.1.5.1 For the statutory consultation, the consultation mailing zone was refined to further reflect the area that would most likely be impacted directly by the Transmission Assets, based on the boundary at that time (the red line boundary presented within the PEIR). This area extended from the coastline south of Blackpool to the area surrounding the existing National Grid substation at Penwortham as well as to the north around Kirkhamas shown in **Plate 4.1**. This included 52,587 known residential and business addresses.

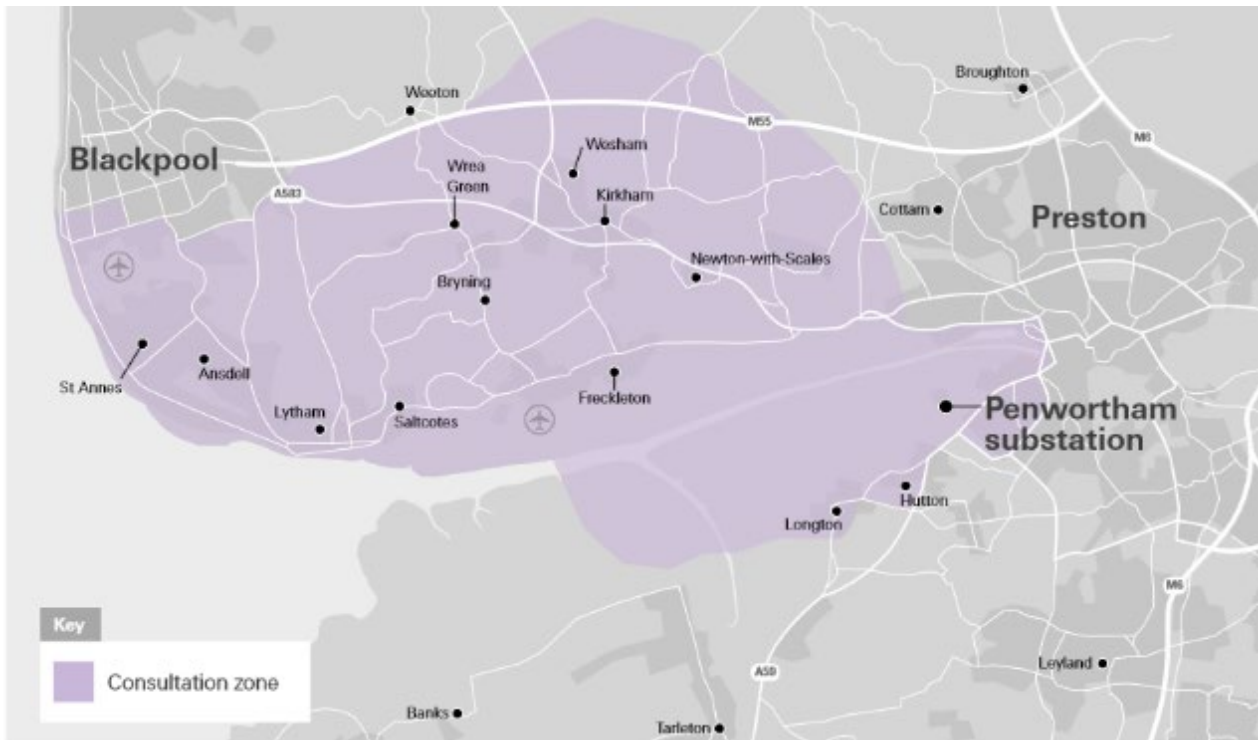


Plate 4.1: Consultation mailing zone used for statutory consultation (as depicted in the SoCC)

4.1.5.2 The Applicants also used a commercial service provided by the Isle of Man Post Office to distribute consultation newsletters to 22,814 addresses in the Douglas Borough Council area of the Isle of Man as shown in **Plate 4.2**.

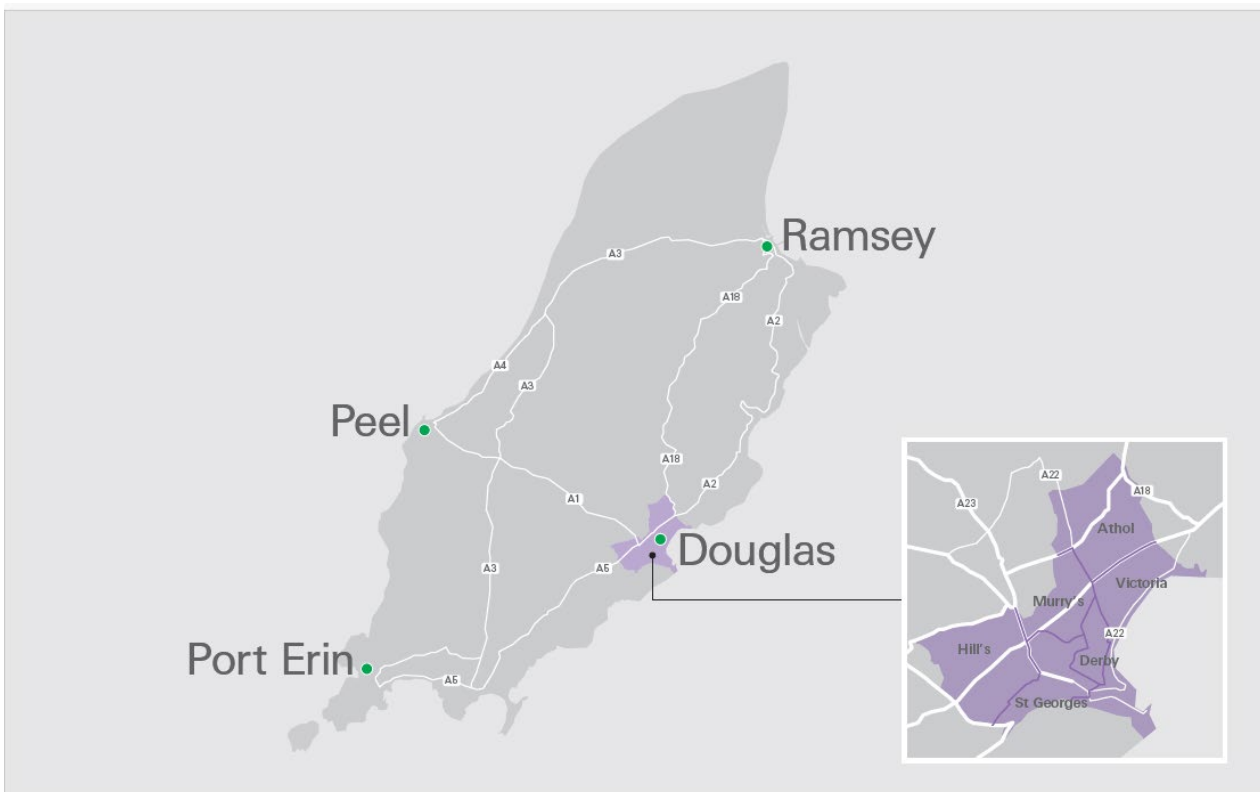


Plate 4.2: Consultation mailing zone used for statutory consultation (Isle of Man)

4.1.6 Identification of section 47 consultees

4.1.6.1 The section 47 consultee list was produced by the Applicants by identifying interested individuals, organisations and community groups that were active in, or represented communities or groups within, the areas likely to be impacted by the Transmission Assets. Community-based groups, SHGs and political representatives/bodies were also identified through a desktop search of such groups in the area. Organisations likely to have a professional interest in the Transmission Assets but had not been specified as section 42 consultees were also identified in accordance with the Planning Act 2008.

4.1.6.2 The Applicants contacted the list of section 47 consultees to make them aware of the consultation and encourage them to provide feedback (see Annex E1.7.1 for section 47 consultee information, document reference E1.7).

4.1.7 Statutory consultation 12 October to 23 November 2023

4.1.7.1 The purpose of the statutory consultation was to allow those within the local community who may be affected by the Transmission Assets, or who may have an interest, to find out more about the Project and give feedback, as well as to gather information from the local community to help refine the design.

4.1.7.2 The statutory section 47 consultation coincided with the section 42 consultation, commencing on 12 October 2023 and finishing on 23 November 2023.

4.1.7.3 Section 47(7) of the Planning Act 2008 states that an applicant must carry out consultation in accordance with the SoCC.

4.1.7.4 The SoCC stated that, throughout the statutory consultation, the Applicants were seeking feedback on the Transmission Assets, including on:

- the PEIR;
- the location of the Transmission Assets; and
- how to minimise the potential likely significant environmental effects to and from the Transmission Assets.

4.1.7.5 The following sections set out how the section 47 consultation was carried out, in terms of the information that was sent to consultees and the mechanisms employed for making communities aware of the consultation events that were held.

4.1.8 Materials published to aid engagement with statutory consultation

4.1.8.1 The Applicants used a variety of methods to help explain the Transmission Assets and encourage people to provide their comments. Community focused materials included:

- a consultation newsletter (see Annex E1.8.3, document reference E1.8);

- the Transmission Assets website (see Annex E1.8.2, document reference E1.8);
- a consultation brochure (see Annex E1.8.4, document reference E1.8);
- a feedback form (see Annex E1.8.15, document reference E1.8); and
- a non-technical summary (NTS) of the PEIR.

4.1.8.2 All documents were created to help people understand the Transmission Assets and provide their comments to the consultation process. The Applicants aimed to make these documents and resources easy to understand and navigate and, where appropriate, the resource made strong use of image and graphics.

4.1.8.3 A range of technical documents were also published on the Transmission Assets website and made available at the consultation exhibitions as part of the consultation, including:

- the PEIR, its NTS and annexes;
- draft works plans;
- draft DCO; and
- HRA Screening Report Matrices and Integrity Matrices.

4.1.8.4 As the consultation was launched, on 12 October, the titles of four figures in Volume 2 of the PEIR (Figures 3.7, 3.9, 3.11 and 3.13) were amended to rectify discrepancies which had been identified in the file names and titles. The data presented in the figures remained unchanged.

4.1.8.5 The amended titles of these documents were as follows:

- PEIR Volume 2, Figure 3.7 - Sandeel spawning and nursery grounds with subsea 10 dB noise SPLpk contours for pin pile locations;
- PEIR Volume 2, Figure 3.9 - Cod spawning and nursery grounds with subsea 10 dB noise SPLpk contours for pin pile locations;
- PEIR Volume 2, Figure 3.11 - Herring spawning and nursery grounds with subsea 10 dB noise SPLpk contours for pin pile locations; and
- PEIR Volume 2, Figure 3.13 - Herring spawning and nursery grounds with subsea 10 dB noise SEL single strike contours for pin pile location.

4.1.8.6 The Applicants placed a note about this on the front page of the Transmission Assets website on 12 October 2023, labelled the items clearly in the consultation hub and wrote to all stakeholders who had received a USB with previous versions of the figures. A copy of that letter can be found in Annex E1.8.1 (document reference E1.8).

Deposit locations

4.1.8.7 The Applicants organised deposits of consultation materials and other supporting information, including the consultation brochure, PEIR NTS, SoCC and feedback forms in hard copy at the locations listed below, which were available for the duration of the consultation. USBs containing all

consultation information, including the PEIR, draft DCO and draft works plans were also available at deposit locations.

4.1.8.8 These locations were chosen by mapping an even spread across the consultation zone and then narrowing down those with the highest footfall. These venues were invited to contact the Applicants if they required any additional materials to be sent to them. The deposit locations used are set out in **Table 4.2**.

4.1.8.9 Delivery of the SoCC to Ansdell Library for 5 October failed due to the library being closed that day. An electronic copy of the document was sent the same day. The librarian confirmed that this had been received, noting that redelivery of the hard copy documents had been arranged due to the limited opening times of the library.

Table 4.2: Deposit locations

Location
Freckleton Library, Preston Old Road, Freckleton, PR4 1PB
Kirkham Library, Station Road, Kirkham, PR4 2HD
St Annes Library, 254 Clifton Drive South, Lytham St Annes, FY8 1NR
Lytham Library, Dicconson Terrace, Lytham St Annes, FY8 5JY
Ansdell Library, 59 Commonsides, Ansdell, Lytham St Annes, FY8 4DJ
Penwortham Town Council and Community Centre, Kingsfold Drive, Penwortham, Preston, PR1 9EQ
Henry Bloom Noble Library, 8 Duke Street, Douglas, Isle of Man, IM1 2AY

4.1.9 Advertising the statutory consultation

4.1.9.1 In accordance with sections 47 and 48 of the Planning Act 2008, a series of formal notices (the statutory notices) were placed in local, national and sector-specific media. The titles used and publication dates are set out in **Table 4.3**. Further information regarding the section 48 notice can be found in **section 4.5.3** of this report).

Table 4.3: Statutory notice publications

Title	Publication date(s)	Reference
Section 47		
Blackpool Gazette	5 October 2023	Annex E1.6.3 (document reference E1.6)
Lancashire Evening Post	5 October 2023	Annex E1.6.3
Lytham St Annes Express	5 October 2023	Annex E1.6.3
Isle of Man Courier	6 October 2023	Annex E1.6.3
Section 48		
Fleetwood Weekly News	11 October 2023	Annex E1.13.1 (document reference E1.13)
Blackpool Gazette	12 October 2023	Annex E1.13.1

Title	Publication date(s)	Reference
Lancashire Evening Post	12 October 2023	Annex E1.13.1
Lytham St Anne's Express	12 October 2023	Annex E1.13.1
Isle of Man Courier	13 October 2023	Annex E1.13.1
Fleetwood Weekly News	18 October 2023	Annex E1.13.1
Blackpool Gazette	19 October 2023	Annex E1.13.1
Lancashire Evening Post	19 October 2023	Annex E1.13.1
Lytham St Anne's Express	19 October 2023	Annex E1.13.1
London Gazette	19 October 2023	Annex E1.13.1
The Guardian	19 October 2023	Annex E1.13.1
Fishing News	19 October 2023	Annex E1.13.1
Lloyd's List	19 October 2023	Annex E1.13.1
Isle of Man Courier	20 October 2023	Annex E1.13.1

4.1.9.2 A variety of different communications channels and methods were used in order to promote the consultation and encourage submission of feedback, a summary is within **Table 4.4** below, full details of each are then set out within the sections which follow.

Table 4.4: Summary of promotion methods

Method	Detail	Annex Reference
Transmission Assets website	A dedicated Transmission Assets website providing information on the Project and links to consultation materials.	Annex E1.8.2 (document reference E1.8)
Consultation newsletter	The Transmission Assets team sent a newsletter to all known 52,587 residential and business addresses in the consultation zone, following diligent inquiry including 22,814 homes on the Isle of Man.	Annex E1.8.3 (document reference E1.8)
Consultation brochure	A brochure was created that provided a summary of the latest proposals and details of the consultation. It was held at deposit locations, distributed at consultation events and available for download via the Transmission Assets website.	Annex E1.8.4 (document reference E1.8)
Posters	Posters were produced promoting participation in the consultation and copies were supplied to all deposit locations listed in the SoCC, as well as other community venues in the local area.	Annex E1.8.5 (document reference E1.8)
Media releases	Two media releases were issued to local media during the consultation in line with the Applicants' SoCC commitments.	Annex E1.8.8 (document reference E1.8)
Newspaper Advertising	The Project ran two rounds of advertising in local media – one at consultation launch and one two weeks before the close of consultation, encouraging people to take part.	Annex E1.8.6 (document reference E1.8)

Method	Detail	Annex Reference
Online Advertising	Google Ads and Spotify were used to publicise widely. A series of banner advertisements also appeared on the Isle of Man Courier, Blackpool Gazette and Lancashire Evening Post websites.	Annex E1.8.9 (document reference E1.8)
Social Media	The consultation for the Transmission Assets was promoted on bp UK and Flotation Energy social media channels, including Facebook, X (formerly Twitter) and LinkedIn.	Annex E1.8.10 (document reference E1.8)
Direct email communication	Emails from the Project were sent directly to identified consultees.	Annex E1.8.11 (document reference E1.8) and Annex E1.9.2 (document reference E1.9)
Section 48 notices	Placed in both local and national newspapers.	Annex E1.13.1 (document reference E1.13)

Transmission Assets website

- 4.1.9.3 A dedicated Transmission Assets website remains accessible free of charge. This was created for the second non-statutory consultation and updated again for the statutory consultation and remains an online repository where people can continue to access all of the Applicants' consultation materials and project updates.
- 4.1.9.4 During the consultation period, there were 2,297 individual users who visited the dedicated Transmission Assets website. The most visited page was the 'About the Project' and the 'Consultation Hub' was the second most visited page.
- 4.1.9.5 All consultation materials were available to view and download and respond to throughout the statutory consultation period (including the PEIR, the SoCC and the online feedback form). The Transmission Assets website made clear to users how to take part in the consultation and the deadline for feedback. An interactive online map enabled consultees to place pins at specific geographic locations and attach their comments to that pin/location. They were also able to attach documents, such as images, to their pin and comment.
- 4.1.9.6 Outside of statutory consultation periods, the Transmission Assets website remained live and people are still able to make contact and view all documents associated with the Transmission Assets.
- 4.1.9.7 Screen grabs of the Transmission Assets website can be seen in Annex E1.8.2 (document reference E1.8).

Consultation newsletter

- 4.1.9.8 Following diligent inquiry, all known residential properties and businesses within the consultation mailing zone (as defined at **section 4.1.5** of this report and in section 7.5 of the SoCC Annex E1.6.1, document reference E1.6)

were sent a newsletter by mail (Annex E1.8.3, document reference E1.8). This totalled 52,587 addresses – with both residential and commercial addresses included. The newsletter was also posted to 22,814 addresses on the Isle of Man. It was issued on 23 October 2023 (to land before the consultation event held on the Isle of Man). The newsletter included the following information:

- details of the Transmission Assets;
- a map displaying the onshore export cable corridor, landfall location, preferred substation locations, indicative onshore construction compounds, 400 kV grid connection cable corridor search area and potential biodiversity benefit, enhancement and mitigation areas;
- a request for recipients to provide feedback to the consultation;
- the dates of the consultation;
- the locations of the planned consultation events; and
- contact details (Transmission Assets website, telephone, email, freepost address) so that people could find out more information, provide feedback and/or ask questions.

Consultation brochure

- 4.1.9.9 A brochure was created that provided a summary of the latest design stage details for the Transmission Assets and details of the consultation. It also highlighted how people could take part in the consultation and the deadline for submitting feedback. The brochure was available at consultation events, deposit locations and online on the Transmission Assets website, where it could be viewed and downloaded. It was also available in hard copy upon request (see Annex E1.8.4, document reference E1.8).

Posters

- 4.1.9.10 The Applicants sent posters for display at locations across the consultation zone. A poster was also created and sent to venues on the Isle of Man.
- 4.1.9.11 The locations were chosen by mapping a range of local locations where high footfall was likely, using desktop research, as well as including the lists of project reference and event locations. The posters were mailed to 39 locations across the consultation zone and three locations on the Isle of Man, with covering letters, asking the recipients to display in a convenient location (Annex E1.8.5, document reference E1.8). The total number of locations where posters were sent was 42. These are listed below:
- Blackpool Boat Angling Club;
 - Blackpool Central Library;
 - Bryning with Warton Parish Council;
 - Douglas Town Hall;
 - Douglas Isle of Man Ferry Terminal;

- Farington Parish Council;
- Freckleton Parish Council;
- Fylde Town Hall;
- Fylde Rugby Club;
- Galloways Preston;
- Greenhalgh-with-Thistleton Parish Council;
- Kesketh-with-Becconsall Parish Council;
- Hutton Parish Council, Longton Parish Council & Lea & Cottam Parish Council;
- Ingol and Tanterton Parish Council;
- Jai's Place – Throu Goods Hutton;
- Kirkham Town Council Community Centre;
- Little Hoole Parish Council;
- Liverpool Ferry Terminal;
- Longton Library;
- Medlar with Wesham Parish Council;
- Newton, Salwick and Clifton Village Hall;
- Newton-with-Clifton Parish Council;
- North Meols Parish Council;
- One Stop, Penwortham;
- Penwortham Arts Centre;
- Penwortham Community Library in the Penwortham Youth and Community Centre;
- Penwortham Methodist Church;
- Penwortham Parish Council;
- Penwortham Town Council and Community Centre;
- Ribby-with-Wrea Parish Council;
- Sainsbury's, Talbot Road, Blackpool;
- Sainsbury's Local, Lytham St Annes;
- Saint Anne's on the Sea Town Council;
- Sharoe Green Library;
- St Annes Cricket Club;
- St Stephen's Parish Centre;
- Tesco, Douglas;

- Treales, Roseacre and Wharles Parish Council;
- Weeton Village Hall;
- Westby-with-Plumpton Parish Council;
- William Segar Hodgson Pavilion; and
- Woodplumpton Parish Council.

4.1.9.12 The posters were issued in time to appear on 12 October 2023 for the duration of the consultation period, until 23 November 2023.

Newspaper advertising

4.1.9.13 In addition to the publication of the statutory section 47 and section 48 notices, the Applicants published a combination of print and digital advertising to promote the consultation. A summary of newspaper advertising is set out in **Table 4.5**. Annex E1.8.6 provides copies of the advertisements of how they appeared in print.

Table 4.5: Summary of newspaper advertising

Title	Publication date(s)	Reference
Blackpool Gazette	12 October 2023	Annex E1.8.6 (document reference E1.8)
Lancashire Evening Post	12 October 2023	Annex E1.8.6
Isle of Man Courier	13 October 2023	Annex E1.8.6
Lytham St Annes Express	19 October 2023	Annex E1.8.6
Isle of Man Courier	10 November 2023	Annex E1.8.6
Blackpool Gazette	13 November 2023	Annex E1.8.6
Lancashire Evening Post	13 November 2023	Annex E1.8.6
Lytham St Annes Express	16 November 2023	Annex E1.8.6

4.1.9.14 These publications were chosen as they provided good geographical coverage of the consultation area.

4.1.9.15 The print advertisement appeared twice, once at the start of the consultation in the week commencing 12 October 2023 and another approximately two weeks before the close of consultation, in November 2023. The first of these adverts advertised the launch of the consultation, while the second notified of the consultation closing soon and encouraging people to take part.

4.1.9.16 The geo-targeted digital adverts on the newspaper sites appeared continuously from consultation launch on 12 October 2023 to consultation close on 23 November 2023. However, halfway through the consultation period, the messaging of these digital advertisements changed from a 'consultation open' message to 'consultation closing soon' message. Examples of these digital adverts are provided in Annex E1.8.7 (document reference E1.9).

4.1.9.17 Two media releases (see Annex E1.8.8, document reference E1.8) were sent out to the outlets listed in Annex E1.4.3 (document reference E1.4); to mark

consultation launch on 12 October 2023 and on 9 November 2023, as an updated release relating to the close of consultation.

4.1.9.18 These releases were also available on the bp and ENBW Project website and on Flotation Energy's website (see Annex E1.8.8 for in situ examples).

4.1.9.19 Media coverage from local and regional newspapers and websites, who ran articles during the statutory consultation period regarding the Transmission Assets are detailed below and can be found at Annex E1.8.8 (document reference E1.8):

- Blackpool Gazette, 12 October 2023;
- Fylde Council News, 12 October 2023;
- Lytham St Anne's News, 12 October 2023;
- Offshore Magazine, 12 October 2023;
- OGV Energy, 12 October 2023;
- ReNEWS.biz, 12 October 2023;
- Windpower Monthly, 19 October 2023;
- Isle of Man Today, 21 October 2023;
- Isle of Man Today, 23 October 2023;
- Blackpool Gazette, 2 November 2023;
- OGV Energy, 10 November 2023; and
- Blackpool Gazette, 22 November 2023.

Online advertising

4.1.9.20 A Google Ads campaign, where sponsored adverts appear at the top of any Google search for relevant terms within a specific geotargeted location, was used to publicise the statutory consultation for the Transmission Assets throughout the entirety of the consultation period. The medium was chosen in acknowledgement of people's tendency to use Google to search for information.

4.1.9.21 The Applicants geotargeted the advertisements to cover the consultation mailing zone.

4.1.9.22 The Google advertisement also targeted specific search terms, capturing people in close proximity to the Transmission Assets who were searching for relevant terms. These terms included:

- Morecambe Offshore Windfarm;
- Morgan Offshore Wind Project;
- offshore wind farm;
- wind farms Irish Sea;
- Transmission Assets; and
- bp wind farm.

4.1.9.23 The Google advertisement was visible throughout the entirety of the consultation period (Annex E1.8.9, document reference E1.8). In total, this advertising campaign generated 2,003 impressions and 277 clicks (13.8% conversion rate) through to a generic landing page⁵, which included links to all Projects mentioned on the digital adverts. From this landing page, consultees could navigate to the Project they were interested in, including the Transmission Assets.

4.1.9.24 The Applicants also conducted an advertising campaign on Spotify, also available at Annex E1.8.9 (document reference E1.8). This advertising campaign targeted areas in which in-person exhibition events were being held and designed to:

- increase awareness of consultation as much as possible, and in as broad a demographic as possible; and
- encouraging listeners to access more information online and take part in the consultation.

4.1.9.25 The adverts published on Spotify made 138,732 impressions and 801 clicks (conversion rate of 0.58%).

Social media

4.1.9.26 The statutory consultation was also promoted through posts on both Flotation Energy and bp UK's X (formerly Twitter) and Facebook accounts (see Annex E1.8.10).

Direct email communications

4.1.9.27 A series of email communications were issued to promote the statutory consultation, signpost recipients to sources of information and encourage them to give feedback. Emails were sent to all identified consultees under both section 42 and section 47 of the Planning Act 2008. Emails were sent on 6 October 2023 to give advance notice that the consultation would be starting, and then on 12 October 2023 to formally announce the start of consultation. A summary of this communication for section 47 consultees is set out in **Table 4.6** below. See **section 4.2.5** of this report for email communications with section 42 consultees and Annex E1.9.2 (document reference E1.9) for example emails.

Table 4.6: Direct email communications to section 47 consultees

Date	Subject	Consultee group issued to	Reference
6 October 2023	Advanced notice of consultation	Section 47	Annex E1.8.11 (document reference E1.8)
12 October 2023	Consultation launch	Section 47	Annex E1.8.11
21 November 2023	Consultation closing soon	Section 47	Annex E1.8.11

⁵ www.morecambeandmorgan.com

- 4.1.9.28 Emails were also sent to the land agents of section 44 consultees to confirm the launch of consultation (see **section 4.2.2** of this report).
- 4.1.9.29 A small number of emails were not sent on the launch day of statutory consultation to section 42 and section 47 consultees due to a technical issue with an external supplier's platform between 12 and 17 October 2023.
- 4.1.9.30 These consultees were subsequently provided with the same opportunity to provide feedback as those who received the statutory consultation launch email in a period running concurrent to additional targeted consultation from 23 February 2024 to 24 March 2024. Details of this targeted consultation can be found in **section 4.3.4** of this report.

4.1.10 Stakeholder briefings

7 September 2023

- 4.1.10.1 Ahead of the launch of the statutory consultation, the Applicants offered an online briefing, to the officers at the following authorities:
- Fylde Council
 - Preston City Council
 - South Ribble Borough Council
 - Blackpool Council
 - Lancashire County Council
 - West Lancashire Borough Council
- 4.1.10.2 The briefing, which took place on the 07 September 2024, was to provide an overview of the site selection process for the proposed onshore substation locations and present information for the upcoming statutory consultation. The presentation given at this online briefing can be seen at Annex E1.8.12.

8 September 2023

- 4.1.10.3 Preceding the launch of statutory consultation, the Applicants held a preview event for local elected representatives at Lytham Assembly Rooms on 08 September 2023. This gave attendees early sight of the information that was to be presented during the statutory consultation, to ensure that they would be able to answer questions from constituents during this time. The information shared at this event was an early iteration of the presentation used in the Applicant's statutory consultation webinar on 06 November 2023 (see **section 4.1.11** of this report and Appendix E1.8.14, document reference E1.8).

13 October 2023

- 4.1.10.4 A stakeholder event was held at Lytham Assembly Rooms on 13 October 2023, the day after the launch of statutory consultation. The event was held over two sessions and invitations were issued to the following local groups.
- Morning session: 10.00 am-noon:

- MPs;
- local planning authorities;
- Fylde Council leadership; and
- Blackpool Enterprise Zone.
- Afternoon session: 1.00-3.00 pm:
 - district, unitary, county and parish councillors representing land within the Transmission Assets red line boundary as presented within the PEIR; and
 - Fylde Council Planning Committee.

4.1.10.5 This was a 'drop -in' type event allowing invitees to attend at a time that suited them and to speak to members of the Applicants' team to gain a greater understanding of the proposals.

4.1.10.6 The information available at this event was presented on three pull-up panels which summarised the Project's progress at the statutory consultation stage (see Annex E1.8.12.1, document reference E1.8)

8 November 2023

4.1.10.7 Following dialogue with Fylde Council representatives, on 8 November 2023 a presentation was delivered to Fylde councillors by members of the Applicants' team who between them were able to provide detail on the onshore, intertidal, offshore and stakeholder engagement elements of the proposals being consulted on (see Annex E1.8.12, document reference E1.8)).

24 January 2024

4.1.10.8 On 26 October 2023, the Applicants received an email from South Ribble Council requesting a presentation on the Project for councillors. This request was responded to on 9 November 2023 and an online briefing subsequently took place on 24 January 2024. A PowerPoint presentation supported this meeting the information within which mirrored that which was provided at briefings during the statutory consultation period (see Annex E.1.8.12, document reference E1.8).

4.1.11 In-person consultation events

4.1.11.1 The Applicants ensured that representatives of the Applicants' team were accessible to members of the public so they could find out more about the Transmission Assets, ask any questions and/or meet the team. The Applicant ensured that appropriate team members from a range of disciplines (including, but not limited to, those able to discuss consents, land management and stakeholder engagement) attended all public facing events. These public facing opportunities are detailed below.

4.1.11.2 A series of eight consultation events were held (five village hall style exhibitions, two 'pop up' events and one webinar). The events were located at accessible public locations. All Project materials, including a full hard copy

of the PEIR (at the exhibitions) and feedback forms were available at the events and people were able to submit feedback. In total, 1,048 people attended, or were engaged, through the exhibitions, pop ups and webinar.

Exhibitions

4.1.11.3 Four of the exhibitions were held on a weekday, running from 3-7 pm, and the fifth was held on a Saturday, running from 10-1 pm.

4.1.11.4 **Table 4.7** sets out the exhibitions held and the number of attendees at each.

Table 4.7: Summary of exhibitions

Location	Date	Duration	Number of attendees
Newton, Salwick & Clifton Village Hall, Vicarage Lane, Newton-with-Scales, PR4 3RU	Thursday 26 October 2023	3-7pm	241
St Annes Cricket Club, Vernon Road, Lytham St Annes, FY8 2RQ	Friday 3 October 2023	3-7pm	321
Fylde Rugby Club, Woodlands Memorial Ground, Blackpool Road, Ansdell, Lytham St Annes, FY8 4EL	Friday 10 November 2023	3-7pm	200
William Segar Hodgson Pavilion, Coronation Road, Kirkham, Preston, PR4 2HE	Saturday 11 November 2023	10am-1pm	130
Douglas Borough Council, Town Hall, Ridgeway Street, Douglas, Isle of Man, IM99 1AD	Thursday 16 November 2023	3-7pm	13

4.1.11.5 Event panels were used at the exhibitions to inform attendees of the proposals, how to provide feedback and next steps. This was alongside other materials including, but not limited to, maps of the Project area, brochures, copies of the PEIR and PEIR NTS. These can be seen at Annex E1.8.13 alongside images from the events, also at Annex E1.8.13 (document reference E1.8).

4.1.11.6 During the statutory consultation, the Applicants were contacted by a member of the public requesting for a British Sign Language interpreter to attend an event. A special session was organised prior to the consultation event on 10 November 2023 at Fylde Rugby Club to facilitate this.

Pop-up events

4.1.11.7 Members of the Applicants' team held smaller events in areas of expected high footfall in communities to provide information on the Transmission Assets and answer any questions people might have.

4.1.11.8 These pop-up events were in areas where people would usually be going about their daily activities and where the Applicants' team could be available to engage with anyone who had an interest in the Transmission Assets.

4.1.11.9 One of the pop-up events was held on a weekday and one on a weekend, both from 9am-1pm. Materials, including the consultation brochure, feedback form and PEIR NTS were available, and people were able to submit feedback.

4.1.11.10 A summary of the pop-up events is set out in **Table 4.8** below.

Table 4.8: Pop up event details

Location	Date	Duration	Number of attendees
St Annes Farmers Market, St Annes Road West, Lytham St Annes, FY8 1SB	Thursday 2 November 2023	9am-1pm	62
Penwortham Farmers Market, behind St Teresa's Church, Queensway, Penwortham, Preston, PR1 0DS	Saturday 4 November 2023	9am-1pm	51

Webinar

- 4.1.11.11 The Applicants hosted a webinar on 6 November 2023 from 6-7pm. The webinar consisted of an overview presentation about the Transmission Assets and a live question and answer session. Transmission Assets team members were available to answer questions on a range of topics relevant to both the Transmission Assets and stakeholder engagement.
- 4.1.11.12 This webinar was publicised in consultation materials (including the consultation brochure, newsletter, the Transmission Assets website and the SoCC) and people were able to register online. Thirty people attended.
- 4.1.11.13 A recording of the webinar remains available to view on the Transmission Assets website and a copy of the webinar is provided in Annex E1.8.14 (document reference E1.8).

4.1.12 How people could have their say

- 4.1.12.1 Respondents were able to submit feedback in a variety of ways during the consultation period, as summarised below.
- Feedback map – an interactive map (screenshot at **Plate 4.1**) of the proposals presented during the statutory consultation, allowing people to drop a pin and leave comments online and/or attach files (such as documents or images) to their feedback.
 - Feedback form (see Annex E1.8.15, document reference E1.8) – available on the Transmission Assets website and could be completed online or downloaded, completed and returned by freepost. Hard copies of the feedback form were also available at consultation events, deposit locations or by request from the consultation team. People could submit feedback by filling in the printed form and submitting it at a consultation event or using the freepost address.
 - By email – to the Transmission Assets dedicated email inbox⁶.
 - In writing – to the Transmission Assets freepost address, Freepost MORECAMBE AND MORGAN.

⁶ Info@morganandmorcambe.com

4.1.12.2 The image below shows a screenshot of the interactive map as it appeared on the Transmission Assets website during the consultation.

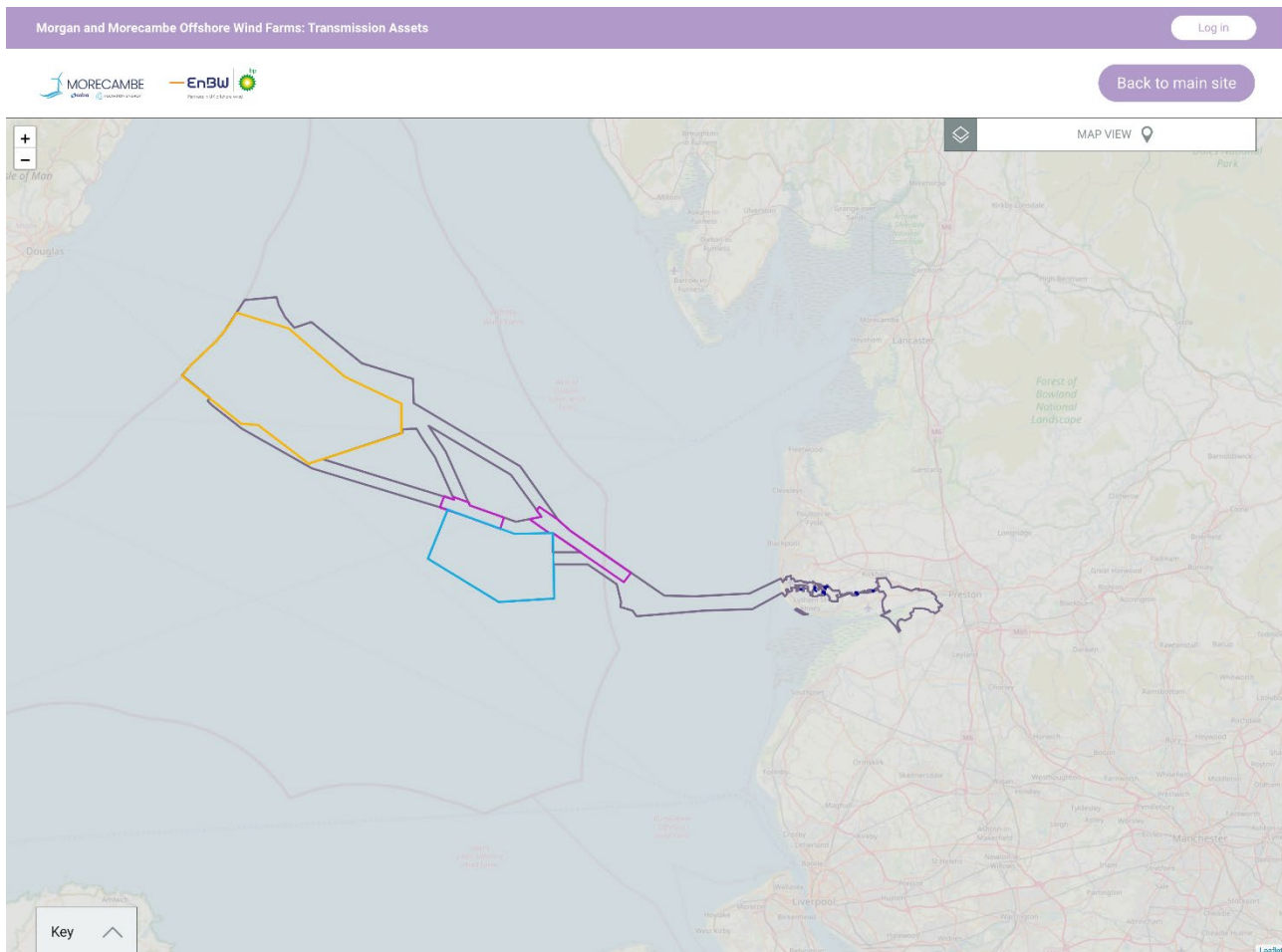


Plate 4.31: Interactive feedback map screenshot

4.1.12.3 Everyone submitting their comments (and providing their contact details) received an acknowledgement that their feedback had been received. Feedback successfully submitted via the Transmission Assets website or by email received an automatic confirmation. Those submitting feedback in writing received an acknowledgement by post. The SoCC stipulated that, while the Applicants would not be able to respond individually to every question, the themes and issues raised during the consultation would be summarised in the Consultation Report.

Contact via telephone

- 4.1.12.4 A dedicated phone line was provided, open 9am-5pm Monday to Friday, and members of the public could leave a message if nobody was able to answer. Calls were returned on the same day, where possible, or on a Monday if a message had been left over the weekend.
- 4.1.12.5 A total of 36 calls were received during the consultation period and information was provided to callers and materials (USBs, consultation brochures, feedback forms) sent by post, when requested. No formal feedback was submitted by phone.

Acknowledgement letters

- 4.1.12.6 Every consultee who submitted their feedback to the statutory consultation via email and/or online feedback form received an instant automated response thanking them for their feedback. Examples of the auto-acknowledgements are provided in Annex E1.8.16 (document reference E1.8). No auto-acknowledgement was sent for feedback submitted via the interactive map via the Transmission Assets website.
- 4.1.12.7 To fulfil the SoCC commitment, the Applicants acknowledged written feedback with either letters or emails. An example letter is provided in Annex E1.8.16, document reference E1.8).

4.1.13 Compliance with the SoCC

- 4.1.13.1 As set out in the Planning Inspectorate Advice Note 14 (Planning Inspectorate, 2021), a consultation report should provide evidence of how applicants have complied with the published SoCC.
- 4.1.13.2 In accordance with section 47(7) of the Planning Act 2008, consultation was carried out in accordance with the approach set out in the SoCC.
- 4.1.13.3 The following statutory requirements have been fulfilled during the statutory section 47 consultation.
- A draft SoCC (Annex E1.6.1, document reference E1.6) was prepared, which sets out how the Applicants proposed to deal with the relevant local authorities in whose area the proposed development lies (section 47(2)).
 - The Applicants conducted a statutory consultation on its draft SoCC with the relevant local authorities (see **section 4.1.3** of this report).
 - The draft SoCC consultation included sending the document (section 47(4)) with a covering email that set out information regarding the formal consultation process and the date by which feedback was required.
 - The Applicants considered all relevant responses received on the draft SoCC (see **Table 4.1**).
 - Notice of the final SoCC was published in local newspapers (Blackpool Gazette and the Lancashire Evening Post) and copies of the final SoCC were made available on the Transmission Assets website, at local deposit locations and consultation events (see **section 4.1.4** of this report).
 - The consultation process was carried out in accordance with the SoCC (section 47(7)). A SoCC compliance table is set out below and a Consultation Compliance Checklist, including how the SoCC commitments have been complied with, is contained in Annex E1.2.1 (document reference E1.2).
 - The SoCC confirmed that the Transmission Assets comprise EIA development and described how the Applicants intended to publicise and consult on the PEIR (Regulation 12 of the 2017 EIA Regulations).

4.1.13.4 Compliance with each commitment set out in the SoCC is established in **Table 4.9** below.

Table 4.9: Compliance with SoCC

Section /page number	SoCC Statement	How the Applicants complied	Cross reference for evidence / more information
1.1/p3	We have publicised this SoCC through public notices in the Blackpool Gazette and the Lancashire Evening Post, serving people living in the vicinity of the land in which the Project will sit.	The section 47 notice appeared in the Blackpool Gazette, Lancashire Evening Post and Blackpool Gazette on 5 October, and in the Isle of Man Courier on 6 October 2023.	See section 4.1.4 of this report and Annex E1.6.3 (document reference E1.6).
1.1/p3	This SoCC has been developed in consultation with the relevant authorities where the Project will be located, and those that may interact with the Project, including: Fylde Council Preston City Council South Ribble Borough Council Blackpool Council Lancashire County Council West Lancashire Borough Council.	Fylde Council, Preston City Council, South Ribble Borough Council, Blackpool Council, Lancashire County Council and West Lancashire Borough Council were consulted on the draft SoCC.	See section 4.1.3 of this report.
5.2/p12	The Project is required to produce an EIA as defined in the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017, as amended, and The Marine Works (Environmental Impact Assessment) Regulations 2007	The findings of the EIA process are reported within the ES which has been submitted with the application for development consent.	See document reference F1 - F4.
5.2/p12	We are also required to produce a PEIR, which is comprised of a suite of documents relating to environmental considerations.	A PEIR was produced and was made available on the Transmission Assets website to inform the statutory consultation.	See section 4.1.8 of this report.
5.2/p12	Consulting further on the PEIR itself gives consultees and stakeholders an opportunity to consider how we have used the information we have gathered and to provide further feedback. This is an important part of the consultation process, providing accountability, transparency and confidence	The PEIR was available on the Transmission Assets website from 12 October 2023. It remains on there for people to be able to access it for reference.	See section 4.1.8 of this report.
5.2/p12	The PEIR will be published in full on the consultation website at www.morecambeandmorgan.com/transmission .	The PEIR was available on the Transmission Assets website from 12th October 2023. It remains on there for people to be able to access it for reference.	See section 4.1.8 of this report.
7.2/p15	As this is a statutory consultation, we are required to consult with a number of prescribed representatives. We will also actively seek to	These stakeholders were all identified and consulted as part of the statutory consultation.	See section 4.2.3 of this report, Annex E1.9.1 (document

Section /page number	SoCC Statement	How the Applicants complied	Cross reference for evidence / more information
	<p>engage with a range of different people and groups. The groups defined in the Planning Act 2008 are as follows:</p> <ul style="list-style-type: none"> • Section 42: Prescribed bodies and statutory consultees Prescribed bodies as listed in Schedule 1 of the Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009 (as amended). • Section 43: Local authorities Local authorities, as defined under section 43, including those in whose area the proposals are sited, and adjoining local authorities. • Section 44: Land owners / those with an interest in the land 		reference E1.9) and Book of Reference (document reference D3)
7.2/p15	<p>Section 47: Duty to consult local community</p> <p>In addition to the statutory requirements that have informed the preparation and publication of this SoCC, the Planning Act 2008 includes a duty to consult with the local community. As part of this, we will ensure the following additional groups are consulted: Local communities – people with homes and businesses in the areas that may be impacted by the Project, including the communities and businesses which may expect to be economically impacted. Elected representatives – Members of Parliament; parish/town councils; district/borough councillors; unitary authority councillors; county councillors. Seldom heard groups – individuals and groups that may have difficulties taking part in the consultation process for a range of reasons. Identified special interest groups – such as local wildlife, heritage, maritime and leisure groups. This gives local people an opportunity to provide further feedback on the proposed development and to influence it</p>	<p>The local community, within the consultation mailing zone, were notified at the start of consultation. Various methods were used to advertise the consultation to the local community and others whom may be interested.</p> <p>The Applicants identified elected representatives, SHGs and identified special interest groups such as local wildlife, heritage, maritime and leisure groups whom were all notified of the consultation.</p>	See sections 4.1.6 and 4.1.9 of this report and Annex E1.7.1 (document reference E1.7).
7.2/p15	We will engage with these consultees directly and will be inviting them to comment on our proposals during the consultation	We engaged directly by email and hard copy with section 42 and section 43 stakeholders. We engaged directly by email with those in the section 47 list.	See sections 4.1.9 and 4.2.5 of this report.

Section /page number	SoCC Statement	How the Applicants complied	Cross reference for evidence / more information
7.2/p15	We'll look carefully at all of the feedback we receive, and this will be considered to help finalise our proposals. This will be summarised in our Consultation Report, which will be an important part our application.	Feedback has been considered and the Applicants' responses are available to view as part of this Consultation Report.	See section 4.7 of this report and Annex E1.16 (document reference E1.16).
7.3/p15	Our approach to engagement and consultation is to seek general feedback on the proposals, including specific focuses on: <ul style="list-style-type: none"> • Our Preliminary Environmental Information Report • The location of the Transmission Assets • How we can minimise the potential likely significant environmental effects to and from the Project. 	The materials produced for statutory consultation covered these matters and invited feedback upon them.	See sections 4.1.8 and 4.1.12 of this report.
7.4/p16	Our statutory consultation will run from 12 October to 23 November 2023.	The statutory consultation ran from 12 October 2023 until 23 November 2023.	See section 4 of this report.
7.5/p16	For this consultation, we have identified a consultation zone which is illustrated on the map below. This is based on who we think may be affected by our proposals. We will let people living/working in this area know about our consultation by posting information at the start of our consultation period.	A newsletter was distributed to all known 52,587 homes and businesses in consultation mailing zone. The newsletter was also sent to 22,814 homes on the Isle of Man to comply with "a mailshot will be sent to residential and business addresses in the vicinity of the public consultation events" as an event was held in Douglas.	See sections 4.1.5 and 4.1.9 of this report.
7.5/p16	We will also hold public consultation events in communities within this zone.	A series of eight consultation events were held (five village hall style exhibitions, two 'pop up' events and one webinar). The events were located at accessible public locations.	See section 4.1.11 of this report and Annex E1.8.13 (document reference E1.8).
7.5/p16	We will promote the consultation through multiple channels. This will include advertising in local media outlets that serve communities within the consultation zone and press releases to encourage coverage of the consultation in local media outlets.	Copies of notices, advertisement and media coverage (and social media posts) are included in this Consultation Report.	See section 4.1.9 of this report and Annex E1.8 (document reference E1.8).

Section /page number	SoCC Statement	How the Applicants complied	Cross reference for evidence / more information
7.5/p16	Anyone who is interested in the Project is welcome to take part. We welcome all views and will take them into consideration before we submit our final application.	All feedback received has been considered.	See section 4.7 of this report and Annex E1.16 (document reference E1.16).
7.5/p16	The Project will therefore be promoted beyond the consultation zone through advertising and press releases in local newspapers with a wider circulation.	A variety of methods were used to advertise the consultation which included the Lancashire Evening Post and Blackpool Gazette both of which reach beyond the consultation mailing zone.	See section 4.1.9 of this report.
7.5/p16	Alongside this publicity campaign, we will continue to engage with relevant parish councils and local authorities, along with other individuals and stakeholder groups.	Stakeholder briefings were undertaken at the start of the statutory consultation alongside other communications with these groups including: <ul style="list-style-type: none"> • direct emails – consultation is coming, consultation is open, consultation is closing; • direct engagement at events (where parish, district and county councillors attended); and • correspondence and ad hoc engagement with councillors in response to queries at events. 	See sections 4.1.6 , and 4.1.10 of this report.
7.6/p17	We will consult using a variety of methods to help explain our proposals and encourage people to provide their comments.	A variety of methods were used to aid engagement and encourage comments.	See sections 4.1.8 and 4.1.9 of this report.
7.6/p17	These materials will help people to understand the proposed development and provide their comments to the consultation. They will be easy to follow, use plain English and, where appropriate, make strong use of images and graphics.	All documents were created to help people understand the proposed development and provide their comments to the consultation.	See sections 4.1.8 and 4.1.9 of this report.
7.6/p17	Posters – the Project will print posters promoting the consultation and contact local councils, venues hosting events and to other local venues such as supermarkets, shops and libraries to ask them to consider displaying them to promote the consultation and associated events.	Posters were sent to 42 locations to advertise the consultation and events taking place.	See section 4.1.9 of this report and Annex E1.8.5 (document reference E1.8).

Section /page number	SoCC Statement	How the Applicants complied	Cross reference for evidence / more information
7.6/p17	Consultation mailshot – a mailshot will be sent to residential and business addresses in the vicinity of the public consultation events. It will highlight the consultation dates and clearly explain where further information can be found, with a focus on encouraging people to visit the website or contact us via the Project information channels.	A consultation newsletter was delivered to all known 52,587 homes and businesses in the consultation mailing zone and delivered to all addresses in Douglas Borough Council area on Isle of Man (22,814 addresses).	See section 4.1.5 and 4.1.9 of this report.
7.6/p17	Website – the Project website www.morecambeandmorgan.com/ transmission will be the main public source of information and will be updated to explain the latest proposals. The website will make clear how people can take part in the consultation and what the deadline for feedback is. It will include an interactive feedback map of the proposals and a feedback form. All Project materials will also be available on the website.	The Transmission Assets website was updated with all consultation materials and other consultation information and made available from 9.00 am on 12 October 2023. Screenshots of the live version of Transmission Assets website from this period are available within this Consultation Report.	See section 4.1.9 of this report and Annex E1.8.2 (document reference E1.8).
7.6/p17	Consultation brochure – this brochure will provide a summary of the latest proposals and details of the consultation using easily accessible, plain English. It will make clear how people can take part in the consultation and what the deadline for feedback is. The brochure will be available at publicly accessible venues (see page 20), consultation events, on request from the Project team and made available on the website.	The brochure was a key consultation document produced. It was available at deposit locations from the 12 October 2023, available at all events to hand out, and accessible via on the Transmission Assets website.	See section 4.1.9 of this report and Annex E1.8.4 (document reference E1.8).
7.6/p17	Feedback forms – this questionnaire will provide an easy way for people to record and submit their feedback. People will be able to submit feedback by filling in the printed form, or visiting our Project website and completing the form online. The feedback form will be designed to encourage people to provide feedback specific to our proposals and also to provide wider feedback in relation to the proposed development. Forms will be available at publicly accessible venues, our public consultation events and online.	Feedback forms were used as one way to enable people to provide their feedback. The forms were available to download from the Transmission Assets website, submit electronically, in hard copy at deposit locations and at events.	See section 4.1.9 of this report and Annex E1.8.15 (document reference E1.8).
7.6/p17	A range of other materials, including the PEIR and a non-technical summary of the PEIR (PEIR NTS), will also be made available to	A range of technical documents were also published on the Transmission Assets website and made available at	See section 4.1.8 .

Section /page number	SoCC Statement	How the Applicants complied	Cross reference for evidence / more information
	help people better understand our proposals and provide us with their feedback	the consultation events including a draft DCO, draft works plans, PEIR and PEIR NTS.	
7.6/p18	<p>Public engagement events will be held in the communities which may be directly affected by these proposals.</p> <p>Three types of events will be held: Consultation events – a series of public events for people to visit and meet the Project team, find out about the Project and ask any questions they might have. The events will be located at accessible public locations. Consultation materials will be available at each event and people will be able to submit feedback.</p> <p>Pop-up events – members of the team will be out and about in the communities, to provide information on the Project and answer any questions people might have. These events will be located in areas where people are going about their daily activities such as supermarkets, leisure venues and transport hubs. The events will be publicised on the poster, mailshot and Project website, as well as via advertising (both print and online). Online webinar – we will also hold a webinar. This will be publicised in consultation materials and people will be able to register online. The webinar will consist of an overview presentation about the Project and a Q&A session, with a range of Project team members available to answer questions.</p>	<p>A series of eight consultation events were held (five village hall style exhibitions, two 'pop up' events and one webinar). Attendance details are available within this Consultation Report.</p> <p>A recording of the webinar remains available on the Transmission Assets website.</p>	See section 4.1.11 of this report.
7.6/p18	It is our preference to hold a range of in-person and online events. But if we are unable to hold events in-person (for example as a result of extreme weather or public health restrictions), we will make alternative arrangements to deliver a larger, broader range of online consultation events	Not applicable, as the Applicants were able to run in person events. A webinar was held for those unable to access the events.	See section 4.1.11 of this report.
7.6/p20	Deposit locations - These are publicly accessible venues where hard copies of the SoCC, consultation brochure, a non-technical summary of the PEIR and the feedback form can be viewed. Members of the public will also be able to view the full PEIR digitally.	Hard copies of documents were provided at listed deposit locations from the 12 October 2023. The SoCC was provided via deposit locations and on the Transmission Assets website from 5 October 2023.	See section 4.1.8 of this report.

Section /page number	SoCC Statement	How the Applicants complied	Cross reference for evidence / more information
		The PEIR was made available by USB at deposit locations and was available on the Transmission Assets website.	
7.6/p20	The Project will operate a freephone enquiry line answer phone service during the consultation. People will be able to leave a message and a member of the team will respond swiftly.	This was available throughout the statutory consultation.	See section 4.1.12 of this report.
7.7/p21	Advertising – the Project will run two rounds of advertising – at consultation launch and approximately two weeks before the close of consultation, encouraging people to take part. This will consist of print advertising in local newspapers that serve the communities in the vicinity of the Project. We will also advertise online, using local media platforms and Google.	Newspaper and media advertising took place in advance of and throughout the statutory consultation period.	See section 4.1.9 of this report.
7.7/p21	Press releases – the Project will issue media releases to local media during the consultation. A press release will be issued at the start of consultation. A further press release may be issued before the close of consultation, encouraging people to take part.	Media releases are available in this Consultation Report. Ad hoc media enquiries received during consultation were responded to in a timely manner.	See section 4.1.9 of this report.
7.7/p21	Social media – the Project does not have social media channels specific to the Project but the developers may choose to promote the consultation through their own social media channels if appropriate.	Social media posts are available in this Consultation Report.	See section 4.1.9 of this report and Annex E1.8.10 (document reference E1.8).
7.7/p21	Public notices – the Project will also take out public notices in local and national newspapers, as required by the Planning Act 2008	Section 47 and section 48 notices are available in this Consultation Report.	See sections 4.1.4 and 4.5.3 of this report.
7.7/p21	Posters – the Project will print consultation posters and contact local councils, venues hosting events and to other local venues such as supermarkets, shops and libraries to ask them to consider displaying them to promote the consultation and associated events.	Posters were sent to 42 locations to advertise the consultation and events taking place.	See section 4.1.9 of this report and Annex E1.8.5 (document reference E1.8).
7.7/p21	Emails – the Project will send emails to key stakeholders including local councillors, inviting them to take part and to encourage others	Emails to key stakeholders were used to notify the launch and close of the consultation.	See section 4.1.9 of this report.

Section /page number	SoCC Statement	How the Applicants complied	Cross reference for evidence / more information
	to do so. Emails will also be sent to other relevant interest groups and local community organisations		
7.8/p21	<p>To allow people to engage with the consultation at their own convenience, the Project has designed a 'digital first' consultation as outlined in section 7.6. This allows people to take part even if they cannot attend a consultation event.</p> <p>The webinar will be open to anyone to attend and ask questions of the Project. All information will be available on the website and people are encouraged to submit feedback using the online feedback map or online feedback form.</p>	<p>The Transmission Assets website was published and updated on 12 October 2023.</p> <p>A webinar was also held.</p>	See sections 4.1.9 and 4.1.11 of this report
7.8/p21	People will be able to ask questions and find out more by calling the enquiry line, using the email or freepost addresses	<p>People could take part and send in enquiries in a variety of ways. There was a Project hotline (0800 915 2493 (option 3)), email address (info@morecambeandmorgan.com) and Freepost address (FREEPOST MORECAMBE AND MORGAN) through which written or verbal enquiries could be submitted.</p>	See section 4.1.12 of this report.
7.8/p21	<p>For those who are less comfortable engaging digitally, we have developed the consultation to be accessible and this has played an important role in planning consultation activities.</p> <p>Community events will be held in accessible public locations over a number of different days, and at different times of day, to encourage attendance. We will ensure that venues are accessible via public transport, have sufficient parking and are easy to navigate</p>	<p>In person events were held as follows:</p> <ul style="list-style-type: none"> • Thu 26 Oct, 3pm – 7pm - Newton, Salwick & Clifton Village Hall, Vicarage Lane, Newton-with-Scales PR4 3RU • Thu 2 Nov, 9am - 1pm - St Anne's Farmers Market, St Annes Road West, Lytham St Annes, Lancashire, FY8 1SB • Fri 3 Nov, 3pm – 7pm - St Anne's Cricket Club, Vernon Road, Lytham St Annes FY8 2RQ • Sat 4 Nov, 9am – 1pm - Penwortham Farmers' Market, behind St Teresa's Church, Queensway, Penwortham, Preston, PR1 0DS 	See section 4.1.11 of this report.

Section /page number	SoCC Statement	How the Applicants complied	Cross reference for evidence / more information
		<ul style="list-style-type: none"> • Fri 10 Nov, 3pm - 7pm - Fylde Rugby Club, Woodlands Memorial Ground, Blackpool Road, Ansdell, Lytham St Annes, Lancashire, FY8 4EL • Sat 11 Nov, 10am – 1pm - William Segar Hodgson Pavilion, Coronation Rd, Kirkham, Preston PR4 2HE • Thu 16 Nov, 3pm – 7pm - Douglas Borough Council, Town Hall, Ridgeway Street, Douglas, Isle of Man IM99 1AD 	
7.8/p21	We will respond to reasonable requests for further copies of documents	The only occasion the Applicants did not provide documents was in response to a request for a full copy of the PEIR, as the consultee who made the request was subsequently unwilling to cover the printing costs as outlined in the relevant notices.	
7.8/p21	We recognise that some individuals or groups may have difficulties taking part in the consultation process for a range of reasons. For example, we have identified a number of organisations representing seldom heard groups in the area.	SHGs were identified and notified at consultation launch alongside all other section 47 consultees.	Section 4.1.6 of this report and Annex E1.7.1 (document reference E1.7).
7.8/p21	As with our non-statutory consultations, we will write to these organisations at the start of the consultation	The Applicants made contact via email at consultation launch.	Section 4.1.9 of this report and Annex E1.8.11 (document reference E1.8).
7.8/p21	Requests for specific consultation activities will be planned and agreed with the requesting organisation so that our activities best meet the needs of those it represents.	<p>No such requests were received during statutory consultation.</p> <p>Following dialogue with Fylde Council representatives, on 8 November 2023 a presentation was delivered to Fylde councillors by members of the Applicants' team who between them were able to provide detail on the onshore, intertidal, offshore and stakeholder</p>	N/A

Section /page number	SoCC Statement	How the Applicants complied	Cross reference for evidence / more information
		<p>engagement elements of the proposals being consulted on.</p> <p>A Teams presentation was also held on Wednesday 24 January 2024 for councillors from South Ribble Borough Council.</p>	
7.8/p21	<p>We will provide the consultation brochure and feedback form in other formats to meet accessibility requirements upon request, such as large print, braille or audio versions</p>	<p>No such requests were received.</p> <p>However, the Applicants did receive one request for a British Sign Language interpreter to attend an event and a special session was organised prior to the consultation event on 10 November at Fylde Rugby Club.</p>	<p>See section 4.1.11 of this report.</p>
8.1/p22	<p>There are several ways to submit feedback.</p> <p>Feedback map – available on the Project website feedback.morecambeandmorgan.com, this interactive map of the proposals allows people to drop a pin and leave comments online and/or attach files (such as document or images) to their feedback.</p> <p>Feedback form – available on the Project website www.morecambeandmorgan.com/transmission, at consultation events, deposit locations or by request from the team.</p> <p>By email – to info@morecambeandmorgan.com In writing – FREEPOST MORECAMBE AND MORGAN (please be advised it is not possible to send registered post to a freepost address).</p>	<p>A variety of feedback mechanisms were available. Example messaging from the Transmission Assets website is set out below:</p> <p>We would like your feedback on the work we've undertaken on our Project to date.</p> <p>One way to provide your feedback is to complete the online version of our feedback form below.</p> <p>This is not the only you can share your feedback. You can also do so by using one of the following methods:</p> <ul style="list-style-type: none"> • Email us: send us an email with your feedback to info@morecambeandmorgan.com • Write to us: send us a letter with your feedback, addressed to "Freepost MORECAMBE AND MORGAN". (No stamp required, please be advised it is not possible to send registered post to a freepost address). • Paper feedback form: pick up a paper feedback form at one of our events or at a deposit location and 	<p>See section 4.1.12 of this report.</p>

Section /page number	SoCC Statement	How the Applicants complied	Cross reference for evidence / more information
		<p>return it to a member of staff at an event or by post using the freepost instructions on the back page, or download a pdf copy of our feedback form from our consultation hub here, complete it and post it or email it to us.</p> <ul style="list-style-type: none"> • Use or feedback map: available on our website here. This interactive map of the proposals allows, people to drop a pin and leave comments online and / or attach files (such as document or images) to their feedback. 	
8.1/p22	Everyone submitting their comments to us (and providing their contact details) will receive an acknowledgement that their feedback has been received.	Online feedback form submissions were automatically acknowledged via the Transmission Assets website once submitted. Emails received an auto response and postal submissions were acknowledged manually, where contact details were provided.	See section 4.1.12 of this report.
8.1/p22	We are not able to respond individually to every question, but the themes and issues raised during this consultation will be summarised in our Consultation Report, which will be published as part of our DCO application.	This document includes this information, including a summary of feedback received and the Applicants' response.	See section 4.7 of this report and Annex E1.16 (document reference E1.16).
8.1/p22	We will reply to queries received about the logistics of the consultation itself, details of the events being held, availability of consultation materials or advice on how to submit a response.	All enquiries received via the Project telephone line received responses. All Project communications / contact channels remain live.	See section 4.1.12 of this report.
8.1/p22	The Project takes data privacy seriously and all data will be held in line with GDPR best practice	All personal data and feedback collected by the Project was collected and stored according to the Applicants' GDPR-compliant Privacy Policy	See section 2.3 of this report.
8.2/p22	Feedback we have received will be reviewed, alongside further technical assessments, as our proposals are updated.	The Applicants' response to feedback submitted is available in this Consultation Report.	See section 4.7 of this report and Annex E1.16.

Section /page number	SoCC Statement	How the Applicants complied	Cross reference for evidence / more information
8.2/p22	Where further consultation(s) may be conducted by the Project, these will be proportionate to the scale and nature of the changes.	Further consultations were conducted in a proportionate manner to the scale and nature of the changes	See section 4.3 of this report.
8.2/p22	A Consultation Report will be produced and will provide a summary of consultation responses, including how this feedback has been considered. It will detail the consultation process, demonstrating how it was undertaken in accordance with this SoCC, and how it met all legal requirements. We will then submit it as part of the DCO application to the Planning Inspectorate	A Consultation Report (this report) has been produced and submitted as part of the Applicants application for development consent.	This document.

4.2 Consultation under section 42 of the Planning Act 2008 (12 October to 23 November 2023)

4.2.1 Introduction

- 4.2.1.1 The activities undertaken by the Applicants to comply with their duty to consult under section 42 of the Planning Act 2008 are outlined in the following section. The information provided is relevant to section 42 consultation as required under section 37(7)(a) of the Planning Act 2008 and associated guidance (summarised in **section 2.2** of this report).
- 4.2.1.2 Statutory consultation was carried out by the Applicants to ensure the prescribed consultees were engaged and provided the opportunity to comment.
- 4.2.1.3 The Applicants held their section 42 and section 47 consultations at the same time, running from 12 October to 23 November 2023.
- 4.2.1.4 Additional consultation opportunities were also provided to section 42 and 47 consultees, proportionate to the nature and scale of the change (see **section 4.3** of this report).

4.2.2 Legislative context

- 4.2.2.1 Section 42(1) of the Planning Act 2008 states that an applicant must consult the following:
- ‘(a) such persons as may be prescribed,*
- (aa) the Marine Management Organisation, in any case where the proposed development would affect, or would likely to affect, any of the areas specified in subsection (2)*
- (b) Each local authority that is within section 43*
- (c) The Greater London Authority if the land is in Greater London, and*
- (d) Each person who is within one or more of the categories set out in section 44.’*
- 4.2.2.2 Notwithstanding the 2024 Regulations, due to the transitional provisions (see **section 2.2.2** of this report), for the purposes of section 42(1)(a) of the Planning Act 2008, the persons prescribed are those listed in column 1 of the table in Schedule 1 of the Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulation 2009 (APFP Regulations).
- 4.2.2.3 With regard to (aa) (2) of section 42(1) the areas include waters in or adjacent to England up to the seaward limits of the territorial sea. The Transmission Assets fall within English waters and the MMO were duly included as a section 42 consultee. National Resources Wales were also included as a section 42(1)(a) consultee.
- 4.2.2.4 For the Transmission Assets, the relevant local authorities are county, borough and metropolitan councils and unitary authorities in England. Section 43 defines local authorities in terms of whether they fall within the categories of an ‘A’, ‘B’, ‘C’ or ‘D’ local authority:

‘A’ - is a neighbouring local authority (s43(3)) that shares a boundary with a ‘B’ host authority;

‘B’ - is either a unitary council or a lower-tier district council in which the Proposed Development and any associated development is situated (a host authority);

‘C’ - is an upper-tier county council in which the Proposed Development is situated (a host authority); and

‘D’ - is a neighbouring local authority (s43(3)) which is not a lower-tier district council and shares a boundary with a ‘C’ authority.’

- 4.2.2.5 A full list of consultees identified in accordance with section 42(1)(a) and (b) is included at Annex E1.9.1 (document reference E1.9).
- 4.2.2.6 Due to the location of Transmission Assets, the Greater London Authority (section 42(1)(c)) was not consulted as no part of the proposals fall within the jurisdiction of this authority.
- 4.2.2.7 For the purposes of section 42(1)(d), a person is within a category set out in section 44 of the Planning Act 2008 if an applicant knows (after making diligent inquiry) that the person falls within the following three categories:
- an owner, lessee tenant (whatever the tenancy period) or occupier of the land (Category 1, section 44(1));
 - interested in the land or has the power to sell and convey the land or, to release the land (Category 2, section 44(2)); and/or
 - the person would or might be entitled (a) as a result of the implementing of the order, (b) as a result of the order having been implemented, or (c) as a result of the use of the land once the order has been implemented, to make a relevant claim (Category 3, section 44(4)).
- 4.2.2.8 See **section 4.2.4** of this report and **Table 4.11** for further information on consultation with PWILs.
- 4.2.2.9 A duty on applicants exists when consulting a person or organisation under section 42, to notify them of the deadline for receipt of comments to the consultation (section 45(1)). As per section 45(2), this must be a minimum of 28 days, commencing on the day after the day on which the person receives the consultation documents and the purposes of the consultation (section 45(3)). All statutory consultation undertaken ensured that consultees were given a minimum of 28 days to provide feedback.
- 4.2.2.10 Alongside the statutory consultation as prescribed under section 42, section 46 of the Planning Act 2008 also requires an applicant to notify the Secretary of State of the proposed application. Under section 46, an applicant must supply the Secretary of State with the same information provided for the purpose of complying with section 42, if the applicant was required by that section to consult the Secretary of State about the proposed application (section 46(1)), and this must be complied with on or before commencing a section 42 consultation (section 46(2)). A section 46 notification was sent to the Secretary of State for DESNZ and the Planning Inspectorate, containing the relevant consultation information on 11 October 2023. See **section 4.4** of this report for further information.

4.2.3 Identification of section 42 consultees

- 4.2.3.1 The following section provides details on how the Applicants identified section 42 consultees for the statutory consultation under the following four categories:
- prescribed bodies;
 - local authorities;
 - non-prescribed consultees; and
 - PWILs (in line with the three categories of landowner identified in **section 4.2.2** of this report).
- 4.2.3.2 For the purposes of the Consultation Report, unless specifically identified, the consultees identified under these four categories are collectively referred to as 'section 42 consultees.' A full list of prescribed bodies, local authorities and non-prescribed consultees is provided in Annex E1.9.1 (document reference E1.9).
- 4.2.3.3 Advice Note Three (Planning Inspectorate, 2017a) explains the approach taken by the Planning Inspectorate when identifying consultation bodies to be notified, and where relevant, consulted on the scope of the ES in accordance with the 2017 EIA Regulations.
- 4.2.3.4 The Advice Note goes on to say that, whilst the responsibility is on an applicant to ensure pre-application consultation fully accords with requirements of the Planning Act 2008, applicants may find it helpful to understand the approach taken by the Planning Inspectorate, when meeting its relevant statutory notifications and consultation obligations under the 2017 EIA Regulations.

Prescribed bodies

- 4.2.3.5 Prescribed bodies include the main statutory bodies that are to be consulted under section 42(1)(a) and include those with specific expertise and/or statutory responsibility for the given discipline(s).
- 4.2.3.6 The list of consultees detailed in Schedule 1 of the APFP Regulations provides a starting point for identifying the prescribed bodies relevant to the Transmission Assets. Additional bodies who were notified of the proposed application by the Planning Inspectorate under Regulation 11(1)(a) of the 2017 EIA Regulations were then also added. The Regulation 11 list is produced in response to an applicant notifying the Planning Inspectorate that an ES is proposed to be provided under Regulation (8)(1)(b) of the 2017 EIA Regulations (see Annex E1.14.2, document reference E1.14).
- 4.2.3.7 Annex E1.9.1 (document reference E1.9) provides a full list of identified prescribed bodies in line with APFP Regulations.
- 4.2.3.8 As part of the ongoing consultation with technical consultees via the EPP Steering Group, EWGs and Engagement Forums, the Transmission Assets team has been in contact with several individuals within the organisations identified within the prescribed consultee list. As such, statutory consultation materials were shared with both the main contact of the organisation and

other identified contacts. This detail is included in Annex E1.9.1 (document reference E1.9) within the 'Direct Project contact' column of each table relating to section 42 consultees.

Local Authorities

4.2.3.9 In accordance with section 43(1)(b), the land for the proposed development was defined as the area within which the onshore infrastructure would be located, including the onshore export cable corridor, onshore substations, 400 kV grid connection cable corridor, temporary construction compounds, landfall area, potential offsite access routes, temporary (construction) and permanent (operational) accesses to land within this area.

4.2.3.10 All onshore infrastructure will be situated on land within the jurisdiction of Blackpool Council, Fylde Council, South Ribble Borough Council, Preston City Council and Lancashire County Council. Together, these are considered the 'host authorities' for the Transmission Assets. The boundaries of the host authorities in association with the onshore infrastructure is illustrated in **Plate 4.4** below.

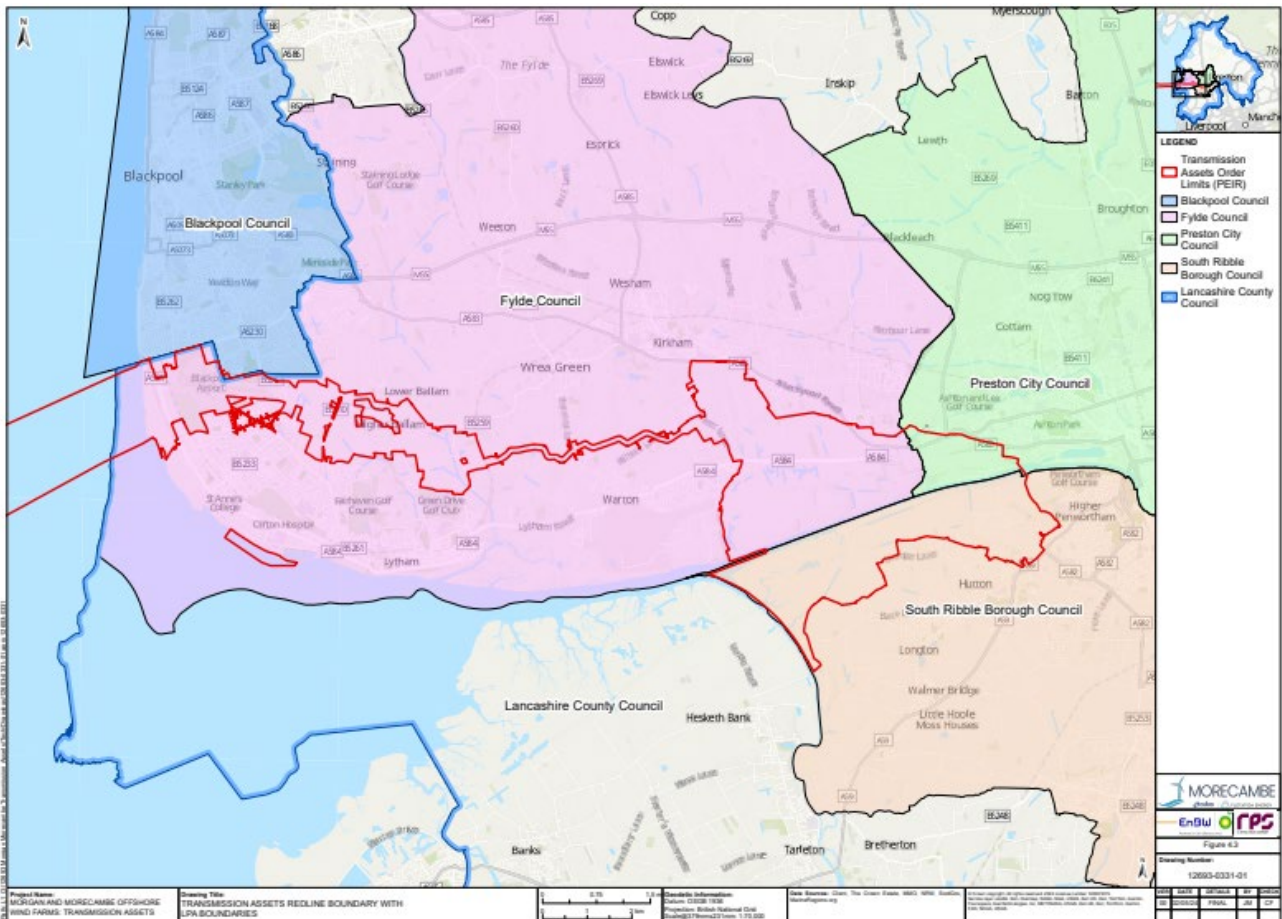


Plate 4.4: Host authority boundaries (accurate at time of section 42 notice publication)

4.2.3.11 As set out in **section 4.2.2** above, section 43 also includes local authorities who share a boundary with the host authorities, at both lower-tier district and upper-tier county level (neighbouring authority). **Table 4.10** sets out those

authorities which fell under section 43 of the Transmission Assets (see also Annex E1.9.1, document reference E1.9)

Table 4.10: Authorities identified under section 43 of the Planning Act 2008

Local Authority	Reason for consulting
Blackpool Council	Transmission Asset host authority
Fylde Council	Transmission Assets host authority
Lancashire County Council	Transmission Assets host authority
Preston City Council	Transmission Assets host authority
South Ribble Borough Council	Transmission Assets host authority
Blackburn with Darwen Borough Council	Neighbouring authority
Bolton Metropolitan Borough Council	Neighbouring authority
Bradford Metropolitan Borough Council	Neighbouring authority
Bury Metropolitan Borough Council	Neighbouring authority
Calderdale Metropolitan Borough Council	Neighbouring authority
Chorley Council	Neighbouring authority
Cumberland Council	Neighbouring authority
Knowsley Metropolitan Borough Council	Neighbouring authority
North Yorkshire County Council	Neighbouring authority
Ribble Valley Borough Council	Neighbouring authority
Rochdale Metropolitan Borough Council	Neighbouring authority
Sefton Council	Neighbouring authority
St Helens Council	Neighbouring authority
West Lancashire Borough Council	Neighbouring authority
Westmorland and Furness Council	Neighbouring authority
Wigan Council	Neighbouring authority
Wyre Council	Neighbouring authority
Yorkshire Dales National Park	Neighbouring authority

Non-prescribed consultees

4.2.3.12 The Planning Inspectorate Advice Note Three (Planning Inspectorate, 2017a) provides guidance on non-prescribed consultation bodies, which are not defined as consultation bodies under the 2017 EIA Regulations but have relevant functions and responsibilities which are akin to other consultation bodies.

4.2.3.13 As detailed at paragraph c1.4 of Advice Note Three, whilst an applicant is not required to consult with non-prescribed consultation bodies in order to meet the statutory pre-application consultation obligations, the applicant is

encouraged to consult with as wide a range of bodies as appropriate during the pre-application stage, including whilst preparing the ES.

- 4.2.3.14 The Applicants identified relevant non-prescribed consultees (Annex E1.9.1 , document reference E1.9) who received the same information and were included in the same way in the section 42 consultation as the prescribed consultees.

4.2.4 Persons with an interest in the land

- 4.2.4.1 As identified under section 42(1)(d) of the Planning Act 2008, an applicant must consult with the relevant persons defined under section 44 of the Planning Act 2008, hereafter referred to as section 44 consultees. Section 44 consultees are defined as any person that is an owner, lessee, tenant or occupier of the land; is interested in the land or has power to sell and convey the land; or is entitled to make a relevant claim if the order sought by the proposed application were to be made and fully implemented. The Applicant's appointed land agents, Dalcour Maclaren, prepared a DCO land referencing methodology for undertaking due diligent inquiry of PWILs. This methodology is included in Annex E1.10.1 (document reference E1.10). The Applicant can confirm that Dalcour Maclaren applied and followed these methodologies for this Project. .
- 4.2.4.2 PWILs have been consulted under section 42 and negotiations are ongoing for voluntary agreements for the land rights required to deliver the Transmission Assets. Dalcour Maclaren, on behalf of the Applicants, has been corresponding with PWILs in accordance with **section 4.2.2** of this report. To identify those PWILs, Dalcour Maclaren began confirming those who were to be consulted under section 42, by issuing PWILs with a questionnaire (an example can be seen at Annex E1.10.2, document reference E1.10) requesting information on:
- contact details;
 - details of the landowner and or/lessees;
 - the nature of the interest in land;
 - details of the use of the land; and
 - information that the landowner would want the Applicants to be made aware of.
- 4.2.4.3 The purpose of the questionnaire was to ensure that all land interests were identified ahead of consultation notices being issued.
- 4.2.4.4 Reminder letters and follow up calls and emails were made throughout 2023 to ensure that these forms were completed and returned. A summary is set out in **Table 4.11** below.

Table 4.11: Summary of questionnaires issued and returned

Land Interest Questionnaires	Number sent
Total number of questionnaires sent	9,037
1st reminder letter	1,504
2nd reminder letter	692
3rd reminder letter	59
Total questionnaires returned	1,052

- 4.2.4.5 Under Part One of the Land Compensation Act 1973, landowners and occupiers may be entitled to compensation for the Compulsory Acquisition of land. Landowners may be identified by an applicant within Category 3 of section 44 of the Planning Act 2008 after making diligent inquiry if their land might suffer a depreciation in value as a result of physical factors caused by the works.
- 4.2.4.6 Dalcour Maclaren, on behalf of the Applicants, has undertaken diligent inquiry to identify the relevant PWILs under section 44 via searches of the land registry, questionnaires, and identification of potential Category 3 claimants. Potential Category 3 interests were identified and are listed in the Book of Reference (document reference D3).
- 4.2.4.7 Following the diligent inquiry undertaken by Dalcour Maclaren to establish PWILs affected, 1,695 PWILs were issued section 42 letters (Annex E1.10.2, document reference E1.10) and section 48 notices on 10 October 2023 (see **section 4.5** of this report and Annex E1.13.1, document reference E1.13). To ensure that all PWILs were aware of the Applicants' proposals and had the opportunity to engage and provide feedback, site notices which included a copy of the section 48 notices were erected at locations along the red line boundary presented within the PEIR (see Annex E1.13.1, document reference E1.13 for example notice *in situ* and location maps). 200 notices were also erected near parcels of unregistered land along with a section 48 notice. The locations were checked weekly and replaced if required throughout the consultation period.
- 4.2.4.8 The Applicants have formally responded to the feedback submitted by PWILs during the consultation, which is detailed in Annex E1.16 (document reference E1.16). This feedback has been discussed with PWILs, together with how the Project team has considered the feedback through the refinement of the Transmission Assets Order Limits. It should be noted that discussions are still ongoing with several PWILs, and that the comments received, and the Applicants' response to them, represent a point in time during the first statutory consultation in Autumn 2023 and the targeted consultations undertaken from November 2023 to October 2024 (see **section 4.3** of this report).
- 4.2.4.9 PWILs have been consulted under section 42 and negotiations are ongoing for voluntary agreements for the land rights required to deliver the Project. More information on Dalcour Maclaren's engagement with land owning and occupying PWILs post-consultation can be found in **section 4.8.3** of this report.

4.2.5 Communications with section 42 consultees

4.2.5.1 Engagement with section 42 consultees (as listed in Annex E1.9.1, document reference E1.9) started a week ahead of the statutory consultation, with a ‘consultation coming soon’ email sent to all consultees (Annex E1.9.2, document reference E1.9). The advanced notice email was sent on 6 October 2023 and covered the following key points.

- An outline of the Transmission Assets – acting as an introduction to the Project to those who may not previously have been aware of it.
- Signposting to the existing Transmission Assets website for further information about the Project and as the location for accessing consultation materials once they were available.
- Highlighting where and when in-person consultation events would be held and inviting consultees to attend.
- Listing the different ways in which feedback could be submitted and the channels that could be used to provide feedback.
- Acknowledging that a follow up communication would be sent at the point the consultation launched.

4.2.5.2 Any bounce backs or undelivered emails were used to update and improve the database with alternatives emails being sourced.

4.2.5.3 Consultation launch communications were issued to all section 42 consultees on 12 October 2023 (Annex E1.9.2, document reference E1.9). This information was sent via email and covered the following key points.

- Confirming the recipient has been identified as a section 42 consultee by the Transmission Assets Project team and linking to a copy of the section 48 notice that had been uploaded to the Transmission Assets website.
- Outlining the key elements of the Transmission Assets.
- Highlighting the start and close dates of the consultation.
- Listing the different ways in which feedback can be submitted and the channels that could be used to provide feedback.
- Explaining what would happen after consultation closes i.e., next steps.
- Defining the Project as an application that requires EIA.
- Stating that consultation materials had been published (consultation brochure and feedback form) and providing the Transmission Assets website links to where the information could be accessed.
- Stating that other consultation information was published, including a list of pertinent documents e.g. the PEIR, PEIR NTS, draft DCO and draft work plans, and providing the Transmission Assets website links to where the information could be accessed.
- Explaining how to contact the Applicants with questions and/or requests for further documentation/information.

- 4.2.5.4 The same communication was also sent via first class post to all section 42 consultees to arrive at consultation launch. This included a hard copy of the consultation brochure, section 48 notice and feedback form (Annex E1.9.2, document reference E1.9). A USB was also provided which contained the other consultation information.
- 4.2.5.5 In the interest of encouraging as much feedback as possible before the close of statutory consultation, the Applicants also sent a ‘consultation closing soon’ email (Annex E1.9.2, document reference E1.9) on 21 November 2023.
- 4.2.5.6 These communications reiterated how people could find out more information about the Transmission Assets and provide feedback. The ‘consultation closing soon’ email also reminded people of the remaining in-person exhibition events and directed people to a recording of the online event webinar on the Transmission Assets website.
- 4.2.5.7 Section 42 consultees were also contacted by post regarding the re-numbering of the PEIR figures at the start of consultation, see **section 4.1.8** of this report for further details.
- 4.2.5.8 The Applicants had a piece of returned mail arrive on 30 October from Utility Assets Limited, a relevant electricity distributor with compulsory purchase powers. The reason given by Royal Mail was ‘*addressee has gone away*’. Utility Assets Limited also responded to the advance notification emails by asking to be removed from our mailing list, and the team were therefore unable to email them at launch. Delivery was arranged to an alternative postal address, Utility Assets Limited, 7 Laxton Close, Attleborough, England, NR17 1QY. Proof of delivery can be found in Annex E1.9.3 (document reference E1.9).

4.3 Targeted statutory consultation

4.3.1 Introduction

- 4.3.1.1 Following statutory consultation, additional periods of targeted statutory consultation were undertaken, including where, new PWILs were identified following refinement and amendments of the boundary of the onshore elements of the Transmission Assets. Full details of each targeted consultation is set out below.

4.3.2 Targeted statutory consultation - newly identified land interests 1 (24 November to 22 December 2023)

- 4.3.2.1 Following conclusion of the statutory consultation in November 2023, through further landowner liaison, feedback from consultation and the return of LOQs, 121 new section 44 PWILs were identified and consulted with through a targeted statutory consultation. The Applicants ran a targeted section 42 consultation with identified and potentially impacted interests from 24 November to 22 December 2023 (inclusive).
- 4.3.2.2 These newly identified PWILs were provided with the same statutory consultation materials as provided during the statutory consultation that ran between 12 October to 23 November 2023. An example letter sent to the

identified new interests is included at Annex E1.11.1 (document reference E1.11). This letter included links to the consultation materials and also enclosed a section 48 notice (Annex E1.13.1, document reference E1.13) and a feedback form (Annex E1.8.15, document reference E1.8).

4.3.2.3 Any responses received during this time can be found within the tables at Annex E1.16.2 - E.1.16.30 due to the proximity of the date with the closure of the main statutory consultation period.

4.3.2.4 Following the close of the targeted consultation it was established by the Applicants that the consultees were not given the full 28-day consultation period. The consultees were therefore added to the list of consultees under the targeted consultation which ran between 23 February to 24 March 2024, outlined below.

4.3.3 Targeted statutory consultation - refinement of the onshore export cable corridor and newly identified land interests 2 (23 February to 24 March 2024)

4.3.3.1 Owing to the feedback received in the statutory consultation, and subsequent targeted consultation in November/December 2023, the Applicants undertook an additional round of targeted consultation to capture refinement of the onshore export cable corridor and the addition of off-route accesses resulting in a refinement of the Transmission Assets Order Limits, as well as additional PWILs identified.

4.3.3.2 In total, 84 section 44 PWILs were consulted from 23 February 2024 to 24 March 2024. There were three groups of interest identified for this targeted consultation.

- Group 1 included 20 new PWILs not previously consulted with and identified through Land Interest Questionnaires (LIQ), HMLR refreshes and ongoing landowner liaison.
- Group 2 included 15 PWILs who were previously consulted with but were reconsulted with due to amendments to the Transmission Assets Order Limits.
- Group 3 included 49 new PWILs which were identified as a result of the amendments to the Transmission Assets Order Limits.

Group 1

4.3.3.3 Group 1 were written to with an introduction to the Transmission Assets, a summary of the statutory consultation undertaken previously, details as to why they were now being consulted alongside the deadline date for any comments. They were provided with the Transmission Assets website link to access the consultation documents from October 2023 which included:

- the PEIR;
- PEIR NTS;
- draft DCO;

- draft works plans;
- consultation brochure (Annex E1.8.4, document reference E1.8);
- consultation feedback from (Annex E1.8.15, document reference E1.8); and
- a copy of the section 48 notice.

4.3.3.4 An example letter sent to Group 1 consultees can be seen at Annex E1.11.2 (document reference E1.11). Group 1 consultees were also sent a hard copy of the section 48 notice (Annex E1.13.1.1), consultation brochure (Annex E1.8.4, document reference E1.8) and feedback form (Annex E1.8.15, document reference E1.8) in the post.

4.3.3.5 This group were not consulted upon the refinements to the boundary as this did not have any impact upon them.

Group 2

4.3.3.6 Group 2 were written to setting out the refinements to the design of the onshore cable corridor and that they were now being consulted on these refinements. They were provided with the Transmission Assets website link to access the consultation materials now available. This included:

- a rationale and summary of the refinements which had been made to the onshore route since PEIR (Annex E1.11.2, document reference E1.11);
- an Overview Map Book (Annex E1.11.2);
- a Detailed Map Book (Annex E1.11.2) setting out the 41 minor amendments proposed; and
- a summary of the potential environmental impacts associated with these proposed amendments, referred to as the EIA Assessment Table (Annex E1.11.2).

4.3.3.7 A hard copy of the Overview Map Book, EIA Assessment Table and October 2023 consultation brochure was also provided.

4.3.3.8 A targeted consultation feedback form was also provided (Annex E1.11.2), along with a deadline date for feedback.

4.3.3.9 An example letter sent to Group 2 consultees can be found at Annex E1.11.2.

Group 3

4.3.3.10 Group 3 were written to with an introduction to the Transmission Assets, a summary of the statutory consultation undertaken previously, details as to why they were now being consulted alongside the deadline date for any comments. They were provided with the Transmission Assets website link to access the consultation documents from October 2023 which included the PEIR, PEIR NTS, draft DCO, draft works plans, consultation brochure and consultation feedback from. A hard copy of the consultation brochure and feedback form was also enclosed.

4.3.3.11 Group 3 were also provided with details relating to the refinements to the design of the onshore cable corridor. They were provided with the Transmission Assets website link to the consultation materials now available. This included:

- a rationale and summary of the refinements (Annex E1.11.2, document reference E1.11);
- an Overview Map Book (Annex E1.11.2);
- a Detailed Map Book (Annex E1.11.2);
- the EIA Assessment Table (Annex E1.11.2); and
- a copy of the section 48 notice.

4.3.3.12 A hard copy of the Overview Map Book, EIA Assessment Table, consultation brochure, feedback form and section 48 notice were also provided.

4.3.3.13 An example letter sent to Group 3 consultees can be found at Annex E1.11.2.

4.3.3.14 As per the statutory consultation held in October 2023, seven site notices for unregistered land were erected, checked and reinstated (if required) weekly. If any responses were received via the notice, LOQs were issued to confirm the details of the interest. PWILs were also offered a site meeting to provide any feedback.

4.3.3.15 There was a minor formatting error when the EIA Assessment Table was converted to PDF for display on the Transmission Assets website under Annex 3. All relevant information was available, however, some of the columns were shifted on to the page below. The PDF table was, therefore, replaced with the Excel version of the file on 23 February 2024 to improve accessibility.

4.3.3.16 Responses received as a result of this consultation can be found within the table at Annex E1.16.31.

4.3.4 Targeted statutory consultation – external supplier technical issue (23 February to 24 March 2024)

4.3.4.1 As set out in **section 4.1.9**, the Applicants identified a small number of section 42 and section 47 consultees who did not receive the direct email intended for them at the launch of statutory consultation for the PEIR due to a technical issue with an external supplier’s platform.

4.3.4.2 Subsequent checks were carried out regarding those specific consultees involved and it was concluded that the section 42 consultees affected were sent hard copy of the consultation materials on 12 October 2023 (see **section 4.2.5** of this report) and as such had duly been consulted and no additional consultation was necessary.

4.3.4.3 The section 47 consultees affected (eight in total) were, therefore, included in a targeted statutory consultation carried out between 23 February 2024 and 24 March 2024 and given the opportunity to provide feedback on the proposals. They were notified by email (Annex E1.11.3, document reference E1.11) on 22 February 2024, in advance of the consultation period

commencing. The email included details of both the previous consultation (12 October to 23 November 2023) and the current targeted consultation. Links to the relevant consultation materials on the Transmission Assets website and a summary of information on the Transmission Assets. The email attached the following materials from October 2023:

- consultation brochure (Annex E1.8.4, document reference E1.8); and
- feedback form (Annex E1.8.15, document reference E1.8).

4.3.4.4 Transmission Assets website links to the section 48 notice and the other consultation information, including the PEIR, PEIR NTS, draft DCO and draft work plans were also provided.

4.3.4.5 Responses received as a result of this consultation can be found within the table at Annex E1.16.31.

4.3.5 Targeted statutory consultation – newly identified land interests 3 (21 March 2024 to 18 April 2024)

4.3.5.1 Following the previous statutory consultations undertaken, through further landowner liaison, HMLR refreshes and the return of LIQs, 23 new section 44 interests were identified and consulted with through a targeted consultation. The Applicants ran a targeted section 42 consultation with identified and potentially impacted stakeholders from 21 March 2024 to 18 April 2024.

4.3.5.2 These newly identified land interests were provided with the Transmission Assets website link to access to the consultation documents from October 2023 which included:

- the PEIR;
- PEIR NTS;
- draft DCO;
- draft works Plans;
- consultation brochure (Annex E1.8.4, document reference E1.8); and
- consultation feedback form (Annex E1.8.15, document reference E1.8).

4.3.5.3 A hard copy of the consultation brochure and feedback form was also enclosed.

4.3.5.4 These PWILs were also provided with details relating to the refinements to the design of the onshore cable corridor. They were provided with the Transmission Assets website link to the consultation materials now available. This included:

- a rationale and summary of the refinements (Annex E1.11.2, document reference E1.11);
- an Overview Map Book (Annex E1.11.2 document reference E1.11));
- a Detailed Map Book (Annex E1.11.2); and
- the EIA Assessment Table (Annex E1.11.2).

4.3.5.5 A hard copy of the Overview Map Book, EIA Assessment Table and section 48 notice was also provided. A targeted consultation feedback form was also provided (Annex E1.11.4, document reference E1.11.).

4.3.5.6 An example letter sent to these consultees can be found at Annex E1.11.4.

4.3.5.7 Responses received as a result of this consultation can be seen at Annex E1.16.31.

4.3.6 Targeted statutory consultation – newly identified land interests 4 (5 August 2024 – 4 September 2024)

4.3.6.1 Following the previous statutory consultations undertaken, through further landowner liaison and updated utility searches, 21 new section 44 interests were identified and consulted with through targeted consultation. The Applicants ran a targeted section 42 consultation with identified and potentially impacted stakeholders from 05 August to 04 September 2024.

4.3.6.2 The new interests were sent a set of consultation materials in the post which included the following:

- S48 Notice (Annex E1.13.1.1);
- an Overview Map Book (Annex E1.11.2);
- the EIA Assessment Table (Annex E1.11.2);
- consultation feedback form (Annex E1.8.15, document reference E1.8).
- consultation brochure (dated October 2023) (Annex E1.8.4, document reference E1.8))

4.3.6.3 An example letter sent to these consultees can be found at Annex E1.11.5, which was issued on 1 August 2024, allowing 30 days to provide their feedback.

4.3.6.4 No feedback was received as a result of this consultation.

4.3.7 Targeted statutory consultation – newly identified land interests 5 (03 September 2024 to 02 October 2024)

4.3.7.1 Following the previous statutory consultations undertaken, through further landowner liaison and updated utility searches 11 new section 44 interests were identified and consulted with through targeted consultation.

4.3.7.2 The new interests were sent a set of consultation materials in the post which included the following:

- S48 Notice (Annex E1.13.1.1);
- an Overview Map Book (Annex E1.11.2);
- the EIA Assessment Table (Annex E1.11.2);
- consultation feedback form (Annex E1.8.15, document reference E1.8).
- consultation brochure (dated October 2023) (Annex E1.8.4, document reference E1.8))

4.3.7.3 An example letter sent to these consultees can be found at Annex E1.11.6, which was issued on the 29 August 2024 and the deadline for receipt of feedback is 2 October 2024.

4.3.7.4 Any feedback received during this consultation will be reviewed and responded to. An update will be provided post-acceptance..

4.3.8 Targeted statutory consultation – newly identified land interests 6 (14 September 2024 to 12 October 2024)

4.3.8.1 Following the previous statutory consultations undertaken, through an updated utility searches ahead of the finalisation of the book of reference, 1 new section 44 interests was identified and consulted with through targeted consultation.

4.3.8.2 The new interests were sent a set of consultation materials in the post which included the following:

- S48 Notice (Annex E1.13.1.1);
- an Overview Map Book (Annex E1.11.2);
- the EIA Assessment Table (Annex E1.11.2);
- consultation feedback form (Annex E1.8.15, document reference E1.8).
- consultation brochure (dated October 2023) (Annex E1.8.4, document reference E1.8))

4.3.8.3 The letter sent to this consultee can be found at Annex E1.11.7, which was issued on the 11 September 2024 and the deadline for receipt of feedback is 12 October 2024.

4.3.8.4 Any feedback received during this consultation will be reviewed and responded to. An update will be provided post-acceptance.

4.4 Notifying the Secretary of State under section 46 of the Planning Act 2008

4.4.1.1 A section 46 notification was issued to the Planning Inspectorate and The Rt Hon Claire Coutinho MP, in her capacity as Secretary of State for DESNZ (at the time of section 46 notification) with the required documentation in accordance with section 46 of the Planning Act 2008 on 11 October 2023 (Annex E1.12.1, document reference E1.12). The electronic documents included:

- section 46 notification;
- statutory consultation brochure;
- statutory consultation feedback form;
- the PEIR;
- PEIR NTS;
- draft DCO;

- draft work plans;
- SoCC;
- statutory consultation poster;
- consultation newsletter;
- notices under sections 47 and 48; and
- a copy of the section 42 letter.

4.4.1.2 A confirmation of receipt email was subsequently received by the Locum Senior Private Secretary to the Secretary of State (Annex E1.12.2, document reference E1.12). The Applicants received a letter back from the Planning Inspectorate on 11 October 2023 (Annex E1.12.3, document reference E1.12).

4.5 Statutory publicity under section 48 of the Planning Act 2008

4.5.1 Introduction

4.5.1.1 This section sets out how the Applicants have complied with the ‘duty to publicise’ under section 48 of the Planning Act 2008, a crucial step in the process of seeking development consent as it ensures that the public is informed about the proposals and has the opportunity to engage in the consultation and provide their views and raise any concerns or objections that could help influence the development of the Transmission Assets.

4.5.2 Legislative context

4.5.2.1 Section 48(1) of the Planning Act 2008 requires an applicant to publicise a proposed application at the pre-application stage, in the prescribed manner, to include a deadline for receipt of responses to the publicity.

4.5.2.2 The prescribed manner is set out in Regulation 4 of the APFP Regulations. Regulation 4(2) sets out what the publicity must entail, specifically this requires the notice to be placed within:

- one or more local newspapers, for at least two consecutive weeks;
- a national newspaper (once); and
- the London Gazette (once) and if land in Scotland is affected, the Edinburgh Gazette (once).

4.5.2.3 In addition, where the proposed application relates to offshore development, within:

- Lloyds list (once); and
- An appropriate fishing trade journal (once).

4.5.2.4 Regulation 4(3)(a)-(i) goes on to provide the details of the matters which must be included in that notice. This includes:

‘(a) the name and address of the applicant;

- (b) a statement that the applicant intends to make an application for development consent to the Commission;*
- (c) a statement as to whether the application is EIA development;*
- (d) a summary of the main proposals, specifying the location or route of the proposed development;*
- (e) a statement that the documents, plan and maps showing the nature and location of the proposed development are available for inspection free of charge on a website maintained on or behalf of the applicant;*
- (ea) the address of the website where the documents, plans and maps can be inspected;*
- (eb) the place on the website where the documents, plans and maps may be inspected;*
- (ec) a telephone number which can be used to contact the applicant for enquiries in relation to the documents, plans and maps; and*
- (f) the latest date on which those documents, plans and maps will be available for inspection on the website (being a date not earlier than the deadline in sub-paragraph(i));*
- (g) whether a charge will be made for copies of any of the documents, plans or maps and the amount of any charge;*
- (h) details of how to respond to the publicity; and*
- (i) a deadline for receipt of those responses by the applicant, being not less than 28 days following the date when the notice is last published.'*

4.5.2.5

In developing and publicising the section 48 notice, regard must be had to the 2017 EIA Regulations and relevant guidance about pre-application procedures. Regulation 13 of the 2017 EIA Regulations places a requirement on an applicant that, where a development is EIA development, they must at the same time as publicising the notice of the proposed application under section 48(1), send a copy of the notice to the relevant consultation bodies and to any person notified to the applicant in accordance with Regulation 11(1)(c) of the 2017 EIA Regulations. The DCLG guidance (DCLG, 2015), relevant to section 48 publicity, details at Paragraph 56 that:

'Applicants are required to publicise their proposed application under section 48 of the Planning Act and Regulations and set out the detail of what this publicity must entail. This publicity is an integral part of the public consultation process. Where possible, the first of the two required local newspaper advertisements should coincide approximately with the beginning of the consultation with communities. However, given the detailed information required for the publicity in the Regulations, aligning publicity with consultation may not always be possible, especially where a multi-stage consultation is intended.'

4.5.3 The section 48 notice for the Transmission Assets

Development of the notice

4.5.3.1 The section 48 notice, which is included in Annex E1.13.1 (document reference E1.13), provided the Applicants' details, Project description, an overview of what the application would cover and consultation period dates. It specified where consultation materials were available to view and how people could respond to the notice or make representations in respect of the Transmission Assets.

Publicising the notice

4.5.3.2 The section 48 notice was first published in the Fleetwood Weekly News on 11 October 2023 and in the Blackpool Gazette, Lancashire Evening Post and Lytham St Annes Express on 12 October 2023. The remaining notices appeared in the press between 12 and 20 October, to coincide with the start of the section 42 and 47 consultation period on 12 October 2023.

4.5.3.3 The notice was available on the Transmission Assets website from 12 October 2023 and appeared in the following newspapers:

- Fleetwood Weekly News, 11 October 2023;
- Blackpool Gazette, 12 October 2023;
- Lancashire Evening Post, 12 October 2023;
- Lytham St Annes Express, 12 October 2023;
- Isle of Man Courier, 13 October 2023;
- Fleetwood Weekly News, 18 October 2023;
- Blackpool Gazette, 19 October 2023;
- Lancashire Evening Post, 19 October 2023;
- Lytham St Annes Express, 19 October 2023;
- London Gazette, 19 October 2023;
- The Guardian, 19 October 2023;
- Fishing News, 19 October 2023;
- Lloyd's List, 19 October 2023 and
- Isle of Man Courier, 20 October 2023.

4.5.3.4 All these notices, as they appeared *in situ*, are shown in Annex E1.13.1 (document reference E1.13).

4.5.3.5 The emails sent to consultees notifying them of the consultation (Annex E1.8.11 and Annex E1.9.2, document references E1.8 and E1.9 respectively) included reference to the section 48 notice and a direct link to where the notice could be read on the Transmission Assets website, along with a formal request for comment on the proposed application after its first publication.

Hard copy letters included a copy of the section 48 notice were also sent to the same consultees.

4.5.3.6 The email also confirmed that, as previously advised, the deadline for responses to the consultation was 23 November 2023.

4.6 Consultation under the 2017 EIA Regulations and Habitats Regulations

4.6.1 Introduction

4.6.1.1 This section presents and summarises the consultation undertaken for the Transmission Assets in accordance with the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the 2017 EIA Regulations) and the Conservation of Habitats and Species Regulations 2017 and the Conservation of Offshore Marine Habitats and Species Regulations 2017 (the HRA Regulations).

4.6.1.2 It sets out the legislative requirements, the approach adopted and details how the Applicants have complied with the relevant legislation. This section also includes the approach to transboundary consultation.

4.6.1.3 The 2017 EIA Regulations contain provisions that are relevant to pre-application consultation and are summarised as follows.

- Regulation 8 provides the procedure for establishing whether EIA is required. It requires an applicant, prior to carrying out consultation under section 42, to either ask the relevant Secretary of State to adopt a screening opinion or notify them that the applicants propose to provide an ES.
 - The Applicants notified the Planning Inspectorate, on behalf of the Secretary of State, in its letter dated 25 October 2022 (Annex E1.14.1, document reference E1.14).
- Regulation 10 provides details relating to the request for an EIA Scoping Opinion including what a Scoping Opinion should include, as detailed in **section 4.7.2** of this report.
- Regulation 11 provides the procedure to facilitate the preparation of an ES for EIA development. This includes provisions for the notification of the consultation bodies of their duties in providing information to facilitate the ES, the provision of a list of those bodies so notified by the applicant and notifying the applicant of those persons considered likely to be affected or have an interest in the Project or unlikely to become aware of the proposed development by other means set out in Part 5 of the Planning Act 2008.
 - The Regulation 11 list of consultation bodies and interested persons was received from the Planning Inspectorate, alongside the Scoping Opinion, dated 8 December 2022 (Annex E1.14.2, document reference E1.14).

- Regulation 12 requires that the SoCC, drafted under section 47(a), must set out whether the proposed development requires EIA and, if so, how the applicant intends to publicise and consult on the PEIR.
 - The SoCC (Annex E1.6.1, document reference E1.6) provides this relevant detail.
- Regulation 13 relates to pre-application publicity under section 48 and requires an applicant, at the same time as publishing the notice under section 48, to provide a copy of the notice to be sent to the consultation bodies and to any person notified to the applicant, in accordance with Regulation 11(1)(c).
 - The Applicants issued a copy of the section 48 notice to the relevant consultation bodies (Annex E1.9.2, document reference E1.9) on 12 October 2023 after the first publication of the section 48 notice (Annex E1.13.1, document reference E1.13).

4.6.1.4 The Planning Inspectorate provides further guidance on matters relating to the 2017 EIA Regulations, as detailed below.

- Advice Note Seven (Planning Inspectorate, 2020a) explains the EIA process as set out in the 2017 EIA Regulations and in particular addresses the procedures for EIA screening and scoping; notification and consultation; matters relating to the production of Preliminary Environmental Information and the preparation of an ES.
- Advice Note 14 (Planning Inspectorate, 2021) refers to the 2017 EIA Regulations consultation highlighting that consultation undertaken as part of the EIA process is separate to that required under the Planning Act 2008. It states that applicants may wish to draw attention to consultation responses received under the EIA process, but any reference to that consultation should be addressed separately from the statutory consultation carried out under the provisions of the Planning Act 2008.

4.6.2 2017 EIA Regulations consultation

4.6.2.1 The Applicants submitted the EIA Scoping Report (pursuant to Regulation 10 of the 2017 EIA Regulations) to the Secretary of State for the former Department for Business, Energy and Industrial Strategy on 28 October 2022 (Morgan OWL and Morecambe OWL, 2022).

4.6.2.2 The EIA Scoping Report contained details of the proposed approach to EIA for each topic in accordance with Regulation 10(3) of the 2017 EIA Regulations, including:

- a plan sufficient to identify the area required for the construction, operation, maintenance and decommissioning of the Transmission Assets;
- a description of the Transmission Assets, including their location and technical capacity;
- an explanation of the likely significant effects of the Transmission Assets on the environment including the aspects likely to be significantly affected; and

- other information the Applicants wished to provide, which included a baseline description for each topic chapter now presented in the ES.

- 4.6.2.3 Following consultation with the statutory bodies, the Planning Inspectorate (on behalf of the Secretary of State) provided a Scoping Opinion on 8 December 2022 (Planning Inspectorate, 2022).
- 4.6.2.4 The Applicants met informally with stakeholders in Q3 of 2022 to discuss their feedback in more detail as part of the EPP, Engagement Forums and wider technical consultation and to make any necessary amendments to the proposed approach, ahead of formal consultation on the PEIR. Please refer to **section 3.7** of this report for participants and the Technical Engagement Plan (TEP) (document reference E5 for further information).
- 4.6.2.5 Consultation on the PEIR was undertaken with section 42 consultees in parallel with statutory consultation in accordance with section 47 of the Planning Act 2008. This provided the opportunity to review and comment upon the proposed Transmission Assets, including the red line boundary contained within the PEIR, onshore cable route options (including the 400 kV grid connection cable corridor search area and onshore export cable corridor options) and onshore substation options, the contents of the PEIR and the assessments undertaken to date (Morgan OWL and Morecambe OWL, 2023).
- 4.6.2.6 Further information regarding EIA consultation can be found in Volume 1 Chapter 5: EIA methodology of the ES (document reference F1.5) and the specific topic chapters of the ES (document references F2 to F4).

4.6.3 Transboundary consultation

- 4.6.3.1 Transboundary effects arise when impacts from a project within one European Economic Area (EEA) state affect the environment of another state(s). The need to consider such transboundary effects has been embodied by the United Nations Economic Commission for Europe Convention on EIA in a Transboundary Context (commonly referred to as the 'Espoo Convention').
- 4.6.3.2 The Espoo Convention is aimed at preventing, mitigating and monitoring environmental damage by ensuring that explicit consideration is given to transboundary environmental factors before a final decision is made as to whether to approve a project. The Espoo Convention has been implemented in the UK via the 2017 EIA Regulations. Regulation 32 of the 2017 EIA Regulations sets out a prescribed process for notifying and consulting EEA states that may be affected by a development that is likely to have significant transboundary effects.
- 4.6.3.3 Furthermore, the Planning Inspectorate's Advice Note 12: Transboundary Impacts and Processes (Planning Inspectorate, 2020b) sets out the procedures for consultation in association with an application for development consent where such development may have significant transboundary impacts. The note sets out the roles of the Planning Inspectorate, other states and developers.

- 4.6.3.4 The Planning Inspectorate was notified of the potential for transboundary impacts through the request for a Scoping Opinion, and the EIA Scoping Report presented the identification and screening of transboundary impacts (Morgan OWL and Morecambe OWL, 2022). A transboundary impacts screening report was also produced and consulted upon as part of the PEIR (Morgan OWL and Morecambe OWL, 2023).
- 4.6.3.5 The Planning Inspectorate is required to comply with Regulation 32 of the 2017 EIA Regulations regarding potential transboundary effects on non-UK states. In a letter dated 20 September 2023, the Planning Inspectorate confirmed that, on behalf of the Secretary of State, the EEA State of Belgium and the Republic of Ireland had been duly consulted (Annex E.15.1, document reference E1.15). Additionally, a Regulation 32 notice was also published on 20 September 2023 (Annex E1.15.2, document reference E1.15) alongside a notice published in the London Gazette on 5 October 2023 (Annex E1.15.3, document reference E1.15).
- 4.6.3.6 A Regulation 32 response was received from Belgium on 29 September 2023 (Annex E1.15.4) and from the Republic of Ireland on 1 November 2023 (Annex E1.15.5, document reference E1.15).
- 4.6.3.7 Despite not being a Regulation 32 EEA State, the Isle of Man Government have been consulted throughout the pre-application stages, recognising them as a key consultee.
- 4.6.3.8 Volume 1, Annex 5.4: Transboundary screening of the ES (document reference F1.5.4) provides an update to the transboundary screening and considers up to date information, the transboundary screening undertaken by the Planning Inspectorate, consultation responses from the EEA States and the outcomes of the EIA.

4.6.4 Habitats Regulations Assessment consultation

- 4.6.4.1 The Habitats Regulations require the assessment of significant effects on internationally important nature conservation sites where these may arise as a result of a plan or project. On the basis of the potential for the Transmission Assets to have a likely significant effect (either alone or in-combination with other plans or projects) on one or more of a number of sites that form part of the UK National Site Network designated under the Habitats Regulations, an Appropriate Assessment of the implications of the Transmission Assets will need to be undertaken by the Secretary of State in respect of the conservation objectives applicable to the relevant sites and/or species.
- 4.6.4.2 The Habitats Regulations make it clear that the person applying for the consent of the plan or project must provide such information as the Competent Authority may reasonably require for the purposes of the assessment. The HRA Stage 1 Screening Report (document reference E3) and Information to Support Appropriate Assessment (ISAA) (document reference E2.1 - E2.3) provides this information.
- 4.6.4.3 The Transmission Assets undertook consultation on the HRA as part of the EPP, within EWGs as well as during statutory consultation when a draft HRA Stage 1 Screening Report and draft ISAA were provided alongside the PEIR.

Please refer to **section 3.7** above for participants of the EPP and the TEP (document reference E5) for further information.

- 4.6.4.4 Responses received during statutory and non-statutory consultation exercises have been considered and fully report in the final Screening Report and ISAA, as submitted as part of the application for development consent. Consultation responses during statutory consultation on the draft ISAA and the Applicants' responses are included in Annex E1.16 (document reference E1.16).

4.7 Summary of responses to statutory consultation and Applicants' regard

4.7.1 Introduction

- 4.7.1.1 This section of the Consultation Report provides a summary of the responses received during statutory consultation and how these were considered by the Applicants in the application for development consent for the Transmission Assets.

- 4.7.1.2 All feedback received from section 42 consultees during the statutory consultation and the Applicants' responses to such are detailed in the tables contained within Annex E1.16 (document reference E1.16). The intention of this section of the Consultation Report is to draw out the key issues raised, the Applicants considerations and any resultant changes. References are made throughout to relevant chapters in the ES and other supporting documents submitted with the application for development consent.

- 4.7.1.3 Section 42 consultees such as prescribed bodies and local authorities and section 44 consultees (PWILs) have been considered by the Applicants alongside section 47 consultees such as members of the public and non-statutory organisations.

- 4.7.1.4 Due to the high number of section 47 consultee responses received and the reoccurring nature of the responses, a themed approach in summarising and addressing this feedback has been taken.

Section 47 themed approach methodology

- 4.7.1.5 During the Applicants' statutory consultation, the Applicants collated and logged all the section 47 feedback received through multiple channels. These included:

- email submissions;
- online feedback forms;
- printed feedback forms / letters; and
- interactive map submissions.

- 4.7.1.6 To ensure a systematic approach to the logging and analysis of this section 47 feedback, the Applicants:

- Categorised and logged the feedback based on the method of submission;

- Feedback received via email was initially grouped separately from feedback submitted through online forms and via printed materials, such as letters;
- This ensured clear tracking and recording of all inputs across all channels.
- Collated the section 47 feedback into a single database;
 - This ensured that the feedback could be analysed as a whole, but also that the origins of each individual piece of feedback were retained for future reference.
- Identified the overarching and recurring themes within the feedback, across all channels;
 - This was achieved using an initial sample of 200 pieces of feedback, checking each in turn to identify the overarching and recurring themes across the sample. Although an initial sample was used to identify the initial key themes the process allowed a second stage to ensure that any additional themes could be identified (see 4.7.1.9).
- Through this sampling, overarching themes were established to identify the recurring and most popular subjects raised / discussed by section 47 consultees.
- These themes were grouped according to subject matter and linked to the relevant PEIR chapters, or assigned to a non-technical/overarching category. This provided a logical framework for categorising the comments received in a way that aligned with the structure of the consultation material.
- This enabled the Applicants to conduct a coherent examination of the feedback received, linking the feedback directly to the areas on which the consultation had been focused and by connecting feedback closely to the PEIR.

4.7.1.7 Once the initial overarching themes had been established, using the feedback sample, the Applicants conducted a second review of the 200 pieces of feedback. This enabled the Applicants to:

- Identify the specific and recurring points within each theme.
 - For example, within the broader theme of onshore substation site selection, a recurring specific point identified that there were concerns over the proximity of the substation to a local school.
 - This more detailed analysis allowed the Applicants to capture not only the overarching themes but also the more specific concerns and suggestions raised.

4.7.1.8 The remainder of the feedback was then analysed, having also been linked to most appropriate PEIR chapters or assigned to a non-technical / overarching category – with each piece checked individually – to ensure that the initial sample reflected the themes raised throughout the wider feedback received and that the feedback was being reflected in context and accurately.

4.7.1.9 To ensure the theming process was thorough, fair and comprehensive, the Applicants implemented an internal peer-review check and a full analysis of the initial themes identified, to ensure no significant themes or points had been overlooked among the 200 piece sample. Where additional themes were identified as a result of the full analysis i.e. beyond those that had been identified among the initial 200 piece sample. Any themes which were identified through the process were added to the analysis as new themes, before being checked against the of all of the feedback and reported in the same way.

4.7.1.10 This process ensured that:

- each piece of section 47 feedback was logged;
- each piece of feedback was reviewed and the themes within it identified; and
- those themes were drawn out so that the Applicants could provide a response and, where appropriate, explain where relevant design changes had been made ahead of submission.

4.7.1.11 A table illustrating the themes raised by section 47 consultees and how the Applicants have considered that feedback can be found at Annex E1.16.1. Consideration of consultation responses has been undertaken in several different ways. In most cases, comments have been addressed through provision of further information or clarification provided either in the ES chapters submitted with the application or through post-PEIR stakeholder engagement. In some cases, design decisions were made in direct response to consultation responses, in other instances, no changes were necessary or have occurred.

4.7.2 Legislation and guidance

Planning Act 2008

4.7.2.1 Section 49(2) of the Planning Act 2008 requires the Applicants to have regard to relevant responses to the consultation and publicity that has been undertaken under section 42, 47 and 48. A relevant response defined in section 49(3) means:

- a response from a person consulted under section 42 that is received by the applicant before the deadline imposed by section 45 in that person's case;
- a response to consultation under section 47(7) that is received by the applicant before any applicable deadline imposed in accordance with the statement prepared under section 47; or
- a response to publicity under section 48 that is received by the applicant before the deadline imposed in accordance with section 48(2) in relation to that publicity.

4.7.2.2 Additionally, section 37(7) requires the consultation report to provide details of:

- what has been done in compliance with section 42, 47 and 48 in relation to a proposed application that has become the application;
- any relevant responses; and
- the account taken of any relevant responses.

Guidance

DCLG Guidance on the pre-application process

- 4.7.2.3 As set out in **section 2.2** of this report, due to transitional arrangements established in associated with newly introduced guidance, the DCLG Guidance (DCLG 2015) is the appropriate guidance against which this consultation has been carried out and reported.
- 4.7.2.4 In relation to the consultation report and responses to pre-application (statutory consultation), Paragraph 23 of the DCLG Guidance (DCLG, 2015) advises that during the pre-application stage, applicants are required to, *inter alia*, ‘*have regard to relevant responses to publicity and consultation*’ in accordance with the requirements of section 49.
- 4.7.2.5 Additionally, Paragraph 80 includes the requirement to:
- ‘...set out a summary of relevant responses to consultation (but not a complete list of responses);*
- provide a description of how the application was informed and influenced by those responses, outlining any changes made as a result and showing how significant relevant responses will be addressed;*
- provide an explanation as to why responses advising on major changes to a project were not followed, including advice from statutory consultees on impacts.’*
- 4.7.2.6 Paragraph 81 highlights that it is good practice that those who responded to the consultation are informed on the results, how the information received has been used by the applicants to shape and influence the project and how any outstanding issues will be addressed before an application is submitted.
- 4.7.2.7 Further, Paragraph 115 states applicants should be able to demonstrate that they have acted reasonably in fulfilling the requirements of the Planning Act, including in taking account of responses to consultation and publicity. If the applicant has acted reasonably, it is unlikely the Secretary of State will conclude that the pre-application consultation was inadequate, on the basis that impacts had not been mitigated to an appropriate degree.

The Planning Inspectorate Advice Note 14 (The Planning Inspectorate, 2021)

- 4.7.2.8 The Advice Note 14 on compiling the Consultation Report states that the report should summarise the individual responses received and categorised in an appropriate way and identify those which are relevant (directly or indirectly) to change made to the project during the pre-application stage, as required by section 49 of the Planning Act 2008. Advice Note 14 also

advises an explanation as to why responses may have led to no change, including if responses were late to be received.

4.7.3 Key changes

4.7.3.1 **Table 4.12** provides a summary of the key project changes following statutory consultation, the reasoning for the change and where further information can be found.

Table 4.12: Key changes following statutory consultation

Change	Description	Justification	Reference
Removal of the Morgan offshore booster station	At PEIR a search area for a Morgan offshore booster station was included. This has been removed from the Morgan Offshore Wind Project. No offshore booster station is contained with the Morgan Generation Assets either.	The Morgan offshore booster station is no longer required and therefore this has been removed from the PDE	Section 4.7.8, 4.7.9, 4.7.14, 4.7.16, 4.7.17 and 4.7.30 of this report, Volume 1, Chapter 3: Project description and Chapter 4: Site selection and consideration of alternatives of the ES (document reference F1.3 and F1.4) along with all chapters within Volume 2 of the ES (document reference F2)
Removal of the OSPs and interconnector cables	At PEIR this infrastructure was proposed to be included the Generation Assets applications, as well as the Transmission Assets proposals. Since PEIR the OSPs and interconnectors have been removed from the Transmission Assets. The OSPs and interconnectors are now only included in each respective Generation Assets applications	To simplify the assessments and to avoid the ‘double-counting’ of the assessment of this offshore infrastructure in the EIA between the Generation Assets and Transmission Assets assessments, within the Transmission Assets cumulative effects assessments. The removal of the infrastructure from Transmission Assets application also sought to simplify and provide clearer separation between the Generation Assets and Transmission Assets applications for key stakeholders and decision-makers.	Section 4.7.8, 4.7.9, 4.7.14, 4.7.16, 4.7.17 and 4.7.30 of this report, Volume 1, Chapter 3: Project description and Chapter 4: Site selection and consideration of alternatives of the ES (document reference F1.3 and F1.4) along with all chapters within Volume 2 of the ES (document reference F2)

Change	Description	Justification	Reference
Refinement of the offshore export cable corridor parameters	<p>The maximum sandwave clearance width along the offshore export cable corridor has been reduced from 60% to 9% for the Morgan export cables and from 30% to 9% for the Morecambe export cables. With a commitment to a maximum of 5% sandwave clearance within the Fylde Marine Conservation Zone (MCZ) (CoT47).</p> <p>Cable protection has been reduced from 20% to 10% for the Morgan offshore export cables and from 15% to 10% for the Morecambe offshore export cables. Within the Fylde MCZ, there is a commitment to limit this allowance to a maximum of 3% in the MCZ (excluding cable crossings), if required.</p>	In response to pre-PEIR, statutory consultation and post-statutory consultation engagement, particularly, but not exclusively in relation to potential impacts to the designated benthic features of the Fylde MCZ.	Section 4.7.8, 4.7.11 and 4.7.12 of this report, Volume 1, Chapter 3: Project description and Chapter 4: Site selection and consideration of alternatives of the ES (document reference F1.3 and F1.4) along with all chapters within Volume 2 of the ES (document reference F2).
Reduction of the Order Limits at landfall	<p>Substantial reductions to the Order Limits have been made to the north of the PEIR boundary at landfall, including removal of the Order Limits from part of the dunes, south of Squires Gate Lane, between the beach and Clifton Drive North.</p> <p>Temporary beach access has been retained from Squires Gate Lane, and part of the Lytham St Annes dunes remain within the Order Limits, with a commitment to direct pipe trenchless technique installation of the offshore export cables (CoT44).</p> <p>A large area within and adjacent to Blackpool Airport has also been removed, with the retention of an operational access off Squires Gate Lane (A5230).</p> <p>South of the PEIR red line boundary a section of the dunes, north of the St Annes North Beach car park have been removed, along with a</p>	<p>Reductions the boundaries have been made as a result of ongoing design process as well as in response to statutory consultation and post-statutory consultation engagement, particularly, but not exclusively, regarding concerns over the potential impacts on the Lytham St Annes dunes SSSI and Blackpool Airport.</p> <p>Horizontal Directional Drilling (HDD) is no longer proposed for the construction at the landfall, to mitigation potential impacts to ornithology (Volume 3, Chapter 4: Onshore and intertidal ornithology) and beach users as direct pipe installation would result in significantly reduced active construction durations on the beach.</p>	Section 4.7.7, 4.7.8, 4.7.22 and 4.7.23 of this report and Volume 1, Chapter 3: Project description and Chapter 4: Site selection and consideration of alternatives of the ES (document reference F1.3 and F1.4) along with all Chapters within Volume 3 of the ES (document reference F3).

Change	Description	Justification	Reference
	<p>large section of the adjacent beach.</p> <p>A central section within the Order Limits has been removed in order to maintain greater distance from residential receptors in the area, and to remove as much of the Lytham St Annes dunes SSSI as possible. East of this, much of the St Annes Old Links Golf Club has been removed.</p>		
<p>Refinement of the onshore export cable corridor</p> <ul style="list-style-type: none"> Removal of the option to install the onshore export cables within or along (as opposed to across or under) roads. Reduction in overall temporary and permanent widths of the onshore export cable corridor Removal of the southern onshore export cable option (Option 2, south) 	<p>At PEIR proposals included the installation of the onshore export cables within Blackpool Road North, Leach Lane, Kilnhouse Lane, and part of Queensway (B5261). These proposals have now been removed from the final application. The project will not be installing onshore export cables within the roads, however, the option to install the onshore export cables across a northern section of Leach Lane using open cut techniques has been retained.</p> <p>The temporary working onshore export cable corridor has been reduced since PEIR from 120m to 100m and the permanent onshore export cable corridor reduced from 80m to 70m.</p> <p>At PEIR two options were included in the Lytham Moss and Higher Balham area, the southern option (Option 2) which passed through to the south of Higher Balham has been removed.</p>	<p>In response to statutory consultation and post-statutory consultation engagement, particularly, but not exclusively, to avoid potential effects and disruption to nearby residents (i.e. by removal the option to install the onshore export cables with the roads south of Blackpool Airport). The overall width of the temporary and permanent cable corridors have been reduced to minimise potential impacts to landowners and other receptors (for example, ecological receptors). The onshore export cable corridor Option 2 (south) was removed in response to feedback at section 42, to mitigate potential effects on ornithological receptors, related to the presence of functionally linked land in the area.</p>	<p>Section 4.7.7, 4.7.8, 4.7.8.1, 4.7.22, 4.7.23 and 4.7.24 of this report and Volume 1, Chapter 3: Project description and Chapter 4: Site selection and consideration of alternatives of the ES (document reference F1.3 and F1.4) along with all Chapters within Volume 3 of the ES (document reference F3)</p>
<p>Refinement of the 400 kV grid connection cable corridor</p>	<p>At PEIR a wide corridor 'search area' for the 400kV grid connection cable corridor was included because of the uncertainties around the final proposed onshore substation sites and location at which the River Ribble would be crossed.</p>	<p>The 76m wide 400kV grid connection cable corridor was established as a part of the ongoing design evolution and route planning and site selection process. The refinement of the temporary and permanent widths also</p>	<p>Section 4.7.8, 4.7.9 and 4.7.21 of this report and Volume 1, Chapter 3: Project description and Chapter 4: Site selection and consideration of alternatives of the ES (document reference F1.3 and F1.4) along</p>

Change	Description	Justification	Reference
	<p>The 400kV grid connection cable corridor has been significantly refined:</p> <ul style="list-style-type: none"> Reduction in the temporary 400kV grid connection cable corridor width (not including the River Ribble crossing) from 96 m at PEIR to 76 m at application. Increase in the permanent 400kV grid connection cable corridor width (not including the River Ribble crossing) from 46 m at PEIR to 50 m at application. Identification of the River Ribble crossing area with a commitment to direct pipe, micro-tunnel trenchless installation techniques. 	<p>took place as part of the ongoing evolution of the design.</p> <p>The reduction in the overall temporary width for the 400 kV grid connection cable corridor have been made to minimise potential impacts to landowners and other receptors (for example, ecological receptors).</p>	<p>with all Chapters within Volume 3 of the ES (document reference F3).</p>
<p>Single onshore substation for the Morecambe Offshore Windfarm: Transmission Assets</p> <ul style="list-style-type: none"> Option 2 (south) being taken forward Refinement of footprint and height 	<p>At PEIR two potential options were presented for the Morecambe onshore substation, Option 1 (north) and Option 2 (south). Option 2 (South) is the preferred location for Morecambe onshore substation. The total permanent footprint has reduced from 60,000 m² at PEIR to 59,500 m² at application, including landscape planting, access, flood attenuation and drainage. The maximum building height has been reduced from 20m and PEIR to 13m at application.</p>	<p>In response to statutory consultation and post-statutory consultation engagement, alongside environmental and engineering considerations.</p> <p>Option 2 (south) is further away from a greater number of sensitive receptors than Option 1 (north) and allows the use of a construction access from the A584 Preston New Road, splitting the construction traffic with the Morgan substation compared to Option 1 (north). Option 2 (south) also results in a significant reduction in cable length for both the onshore export cable and the grid connection cable corridors, and avoid the need to cross the Morgan onshore export cable and grid connection cable</p>	<p>Section 4.7.7, 4.7.9, 4.7.22, 4.7.24, 4.7.25, 4.7.26, 4.7.27 and 4.7.34 of this report and Volume 1, Chapter 3: Project description and Chapter 4: Site selection and consideration of alternatives of the ES (document reference F1.3 and F1.4) along with all Chapters within Volume 3 and 4 of the ES (document reference F3 and F4).</p>

Change	Description	Justification	Reference
		<p>corridors, and its greater distance from the Morgan substation will lead to greater overall construction efficiency.</p>	
<p>Refinement of the onshore substation for the Morgan Offshore Wind Project: Transmission Assets.</p> <ul style="list-style-type: none"> Refinement of location and maximum height Selection of gas insulated switchgear (GIS) Increased footprint 	<p>At PEIR the Morgan preferred onshore substation site was presented within the in the largest 'onshore substation consultation area'. The chosen location has moved east.</p> <p>The maximum building height has been reduced from 20m and PEIR to 15m at application.</p> <p>A commitment to gas insulated switchgear (GIS) technology only. Air insulated switchgear (AIS) will no longer be used.</p> <p>The total permanent footprint has increased from 125 000 m² to 164 000 m². An area has also been included in the total permanent area for the substation, to the east (adjacent to Dow Brook), to provide space for landscaping, environmental mitigation and biodiversity benefit. The additional area included since the PEIR was published are predominantly for the provision of landscaping and mitigation, including areas for drainage and water attenuation.</p>	<p>In response to statutory consultation and post-statutory consultation engagement, particularly, but not exclusively, to create a greater separation from residential receptors closest to the Morgan onshore substation site proposed at PEIR as well as creating greater distance from Hall Cross and Freckleton.</p> <p>The selection of GIS only technology, has been made to reduce the overall area required for permanent electrical infrastructure at the Morgan onshore substation site.</p> <p>The overall permanent area for the Morgan onshore has increased to provide additional space for landscaping, environment mitigation (including drainage and water attenuation) and areas for providing biodiversity benefit.</p>	<p>Section 4.7.7, 4.7.9, 4.7.21, 4.7.22, 4.7.24, 4.7.25, 4.7.26, 4.7.27, 4.7.29 and 4.7.34 of this report and Volume 1, Chapter 3: Project description and Chapter 4: Site selection and consideration of alternatives of the ES (document reference F1.3 and F1.4) along with all Chapters within Volume 3 and 4 of the ES (document reference F3 and F4).</p>
<p>Refinement of crossing technologies</p>	<p>At PEIR the project design envelope allowed for the installation of up to 6 circuits within Blackpool Road Recreation Ground, including via open cut trenching techniques. Installation of onshore export cables within/along Leach Lane was also proposed, as part of plans to install the export cables with the roads south of Blackpool Airport. HDD (or other trenchless installation techniques), not including direct pipe, were proposed for the trenchless crossing under</p>	<p>A commitment to undertaking most major crossings using trenchless installation techniques has been made to avoid direct impacts to the features or obstacles. Equally, trenchless installation of the onshore export cables within Blackpool Road recreation ground has been made to mitigation potential effects of open cut installation HDD is no longer proposed for the</p>	<p>Section 4.7.9 and 4.7.21 of this report and Volume 1, Chapter 3: Project description and Chapter 4: Site selection and consideration of alternatives of the ES (document reference F1.3 and F1.4) along with all Chapters within Volume 3 of the ES (document reference F3).</p>

Change	Description	Justification	Reference
	<p>the Lytham St Annes dunes SSSI, and the St. Annes Old Links Golf Club.</p> <p>For the application the Applicants have committed to all major crossings, such as major roads, river and rail crossings will be undertaken using trenchless technologies, where practicable, with the exception of Leach Lane, which may be open cut (CoT02). HDD (or other trenchless techniques) installation) including direct pipe will be used for up to 4 circuits within Blackpool Road Recreation Ground (CoT123).</p> <p>HDD is no longer proposed for the construction at the landfall with direct pipe to be used to minimise the duration of disturbance on the beach.</p>	<p>construction at the landfall, to mitigation potential impacts to ornithology (Volume 3, Chapter 4: Onshore and intertidal ornithology) and beach users as direct pipe installation would result in significantly reduced active construction durations on the beach.</p>	
Refinement of biodiversity benefit and mitigation areas	<p>At PEIR a number of areas were identified for potential mitigation and biodiversity benefit areas. Substantial reductions have been made within the application and are categorised as environmental mitigation and/ or biodiversity benefit areas.</p>	<p>In response to statutory consultation and post-statutory consultation engagement on ecological mitigation and biodiversity benefit. These areas and the proposals for mitigation have been discussed and refined as part of ongoing EIA and evidence plan process, which includes the relevant nature conservation bodies and local authorities. These areas have been reduced and refined substantially to ensure that areas being sought are proportionate to the potential effects associated with the construction, operation and maintenance and decommissioning of the Transmission Assets.</p>	<p>Section 4.7.9 of this report and Volume 3, Chapter 3 of the ES (document reference F3.3) and the Onshore Biodiversity Benefit Statement (document reference J11).</p>

4.7.4 Overview of responses

4.7.4.1 More than 1,480 pieces of feedback were received during the statutory consultation and targeted consultation. All responses have been categorised

by topic, aligning with the chapters of the PEIR, as set out in **Table 4.13**. In addition, comments also related to the draft HRA and draft DCO, which were also available during the consultation for people to give their views on.

- 4.7.4.2 Overarching and non-topic related responses can be seen in **section 4.7.5** of this report and Annex E1.16.1, E1.16.2 and E.16.31 (document reference E1.16).
- 4.7.4.3 Responses from both section 42 and section 47 consultees have been considered together, but for the reasons set out above (see **section 4.7.1** of this report), the presentation of the feedback differs within Annex E1.16. It is important to note that each issue raised has been given equal consideration, regardless of the frequency with which it was raised, or who raised it.
- 4.7.4.4 Annex E1.16.1 sets out responses, collated by theme, from section 47 consultees (see **section 4.7.1** of this report).
- 4.7.4.5 Section 42 consultee responses are set out within Annex E1.16.2 to E1.16.31. Each Annex has two sub-annexes with a table setting out comments received via the feedback form and comments received by other methods. This is purely for presentational purposes as the former identifies the feedback form question/sub-question. With the exception of Annex E1.16.6 and E1.16.29 as there were no feedback form responses which related to these topics).
- 4.7.4.6 The feedback method used by section 42 consultees is cited within the tables at Annex E1.16.2 to E1.16.31. Where the feedback form was used to provide feedback, if a consultee didn't provide a response for a question/sub-question this is not recorded. If a consultee included 'N/A', 'none', 'no comment', 'Nil', 'No', in response to a question, this has also not been recorded within the Annexes.
- 4.7.4.7 Where a consultee provided a response associated with a sub-question but was not related to the topic of that sub-question, this has been allocated to the sub-question topic as well as any other appropriate topic.
- 4.7.4.8 Where a consultee provided a response which stated 'see response above' or similar, the response has been replicated in brackets and italics rather than not recorded within the Annexes.

Table 4.13: PEIR chapter details and location of summary of feedback and Applicants' response

PEIR chapter number	PEIR chapter title	Reference
Volume 1 – Introduction		
1	Introduction	See section 4.7.6 of this report.
2	Policy and legislation context	See section 4.7.7 of this report, Annex E1.16.3 and Annex E1.16.1.
3	Project description	See section 4.7.8 of this report, Annex E1.16.4, Annex E1.16.1 and Annex E1.16.31.
4	Site selection and consideration of alternatives	See section 4.7.9 of this report, Annex E1.16.5, Annex E1.16.1 and Annex E1.16.31.
5	Environmental assessment methodology	See section 4.7.10 of this report, Annex E1.16.6 and Annex E1.16.1.
Volume 2 – Effects on the offshore environment		
1	Physical processes	See section 4.7.11 of this report, Annex E1.16.7 and Annex E1.16.1.
2	Benthic subtidal and intertidal ecology	See section 4.7.12 of this report, Annex E1.16.8 and Annex E1.16.1.
3	Fish and shellfish ecology	See section 4.7.13 of this report, Annex E1.16.9 and Annex E1.16.1.
4	Marine mammals	See section 4.7.14 of this report, Annex E1.16.10 and Annex E1.16.1.
5	Offshore ornithology	See section 4.7.15 of this report, Annex E1.16.11 and Annex E1.16.1.
6	Commercial Fisheries	See section 4.7.16 of this report, Annex E1.16.12 and Annex E1.16.1.
7	Shipping and navigation	See section 4.7.17 of this report, Annex E1.16.13 and Annex E1.16.1.
8	Marine archaeology	See section 4.7.18 of this report, Annex E1.16.14 and Annex E1.16.1.
9	Other sea users	See section 4.7.19 of this report, Annex E1.16.15 and Annex E1.16.1.
Volume 3 – Effects on the onshore environment		
1	Geology, hydrogeology and ground conditions	See section 4.7.20 of this report, Annex E1.16.16, Annex E1.16.1 and Annex E1.16.31.
2	Hydrology and flood risk	See section 4.7.21 of this report, Annex E1.16.17, Annex E1.16.1 and Annex E1.16.31.
3	Onshore ecology and nature conservation	See section 4.7.22 of this report, Annex E1.16.18, Annex E1.16.1 and Annex E1.16.31.
4	Onshore and intertidal ornithology	See section 4.7.23 of this report, Annex E1.16.19, Annex E1.16.1 and Annex E1.16.31.

PEIR chapter number	PEIR chapter title	Reference
5	Historic environment	See section 4.7.23.1 of this report, Annex E1.16.20, Annex E1.16.1 and Annex E1.16.31.
6	Land use and recreation	See section 4.7.25 of this report, Annex E1.16.21, Annex E1.16.1 and Annex E1.16.31.
7	Traffic and transport	See section 4.7.26 of this report, Annex E1.16.22, Annex E1.16.1 and Annex E1.16.31.
8	Noise and Vibration	See section 4.7.27 of this report, Annex E1.16.23, Annex E1.16.1 and Annex E1.16.31.
9	Air Quality	See section 4.7.28 of this report, Annex E1.16.24, Annex E1.16.1 and Annex E1.16.31.
Volume 4: Effects on the onshore and offshore environment		
1	Seascape, landscape and visual resources	See section 4.7.29 of this report, Annex E1.16.25, Annex E1.16.1 and Annex E1.16.31.
2	Aviation and radar	See section 4.7.30 of this report and Annex E1.16.26, Annex E1.16.1 and Annex E1.16.31.
3	Climate change	See section 4.7.31 of this report, Annex E1.16.1 and Annex E1.16.31.
4	Socio-economics	See section 4.7.32 of this report and Annex E1.16.27, Annex E1.16.1 and Annex E1.16.31.
5	Inter-relationships	See section 4.7.33 of this report.

- 4.7.4.9 Human Health was presented within Volume 1, Annex 5.1 of the PEIR and was also a topic question on the feedback form. Comments received in relation to this topic are dealt with at **section 4.7.33** of this report.
- 4.7.4.10 Comments received in regard to the draft HRA, draft DCO and those from PWILs are dealt with at **sections 4.7.35, 4.7.36** and **4.7.37** of this report.
- 4.7.4.11 All section 42 responses received can be viewed within the tables within Annex E1.16.2 to E1.16.31 (document reference E1.16), alongside the Applicants' response.
- 4.7.4.12 The themes raised by section 47 responses can be viewed within the table at Annex E1.16.1 (document reference E1.16), alongside the Applicants' response.
- 4.7.4.13 Feedback following the Targeted consultations can be found at Annex E1.16.31.
- 4.7.4.14 Within the section 42 tables each responder is given a unique reference code as shown in **Plate 4.5** below.

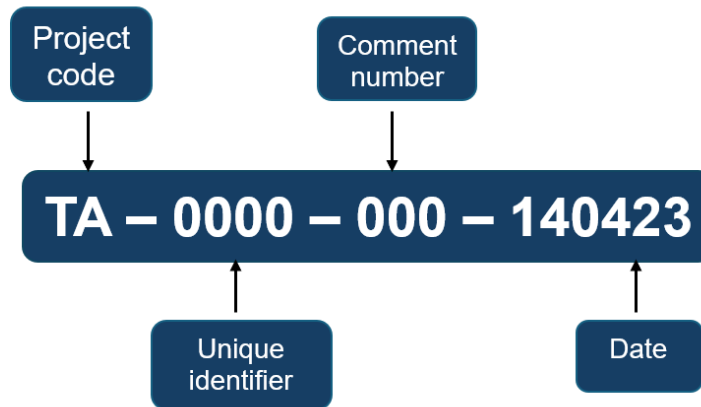


Plate 4.5: Unique reference coding in Annex E1.16.2 – E1.16.31 feedback tables

4.7.4.15 Many section 42 responses received contained comments relevant to more than one topic. Each response has been broken down and separated across the relevant topics as appropriate. Where consultees raised issues that were relevant to multiple topics, these are allocated to the most relevant topic area(s) and the responses can be seen within the associated tables for each topic area (Annex E1.16, document reference E1.16), this may result in one response appearing across multiple tables.

4.7.4.16 Feedback responses were also received relating to formatting, typographic errors and incorrect references, rather than relating directly to a specific subject area. Any such issues raised have been amended in the relevant final application document(s). Comments were also received that requested clarifications on terminology and definitions, which have similarly been resolved in the relevant final application document(s).

4.7.4.17 All comments have been considered by the Applicants. In cases where this has resulted in amendments to the project design and/or changes or additions to the application documentation this is identified. In some cases, the responses led to further discussion and agreement with the relevant consultees. Responses via topic, and regard had to them, are also described within the consultation tables of the relevant chapters of the ES (document reference F1 to F4).

4.7.5 Overarching consultation process and non-technical responses

4.7.5.1 The majority of feedback received related to specific topics or the areas of interest of the responding organisation or individual. However, some respondents also left general overarching comments, either on aspects of the consultation process itself or on subjects beyond the specific scope of the consultation.

4.7.5.2 Comments received from local parish council representatives and members of the public questioned the validity of the consultation undertaken stating it was flawed, lacked evidence of engagement with statutory stakeholders, lacked details and was difficult to understand. As set out in the earlier

sections of this Consultation Report, the Applicants have carried out a robust and transparent public consultation as part of the development process.

- 4.7.5.3 The Transmission Assets has undertaken three rounds of consultation with the local community, including two non-statutory periods of consultation (2 November to 13 December 2022 and 19 April to 4 June 2023) and a statutory consultation (12 October to 23 November 2023). Statutory targeted consultations have also taken place (November 2023 to October 2024), as detailed within the report.
- 4.7.5.4 In order to ensure the consultation information was available to as many people as possible, many different methods were used, including but not limited to a website, newsletter, postcards, consultation brochure, deposit locations, webinar and in-person events. The Applicants aimed to ensure that it was clear how people could have their say, but also how to get in touch with the Transmission Assets team to find out more information.
- 4.7.5.5 Consultation materials, including the brochure, SoCC, PEIR NTS and feedback forms were also made available on the Applicants' consultation website and as hard copies at reference deposit locations for the duration of the consultation. Information about impacts on all areas was also included in consultation documents.
- 4.7.5.6 The Applicants provided documents for the statutory consultation, including a Preliminary Environmental Information Report (PEIR) highlighting the findings of the environmental and technical assessments at that stage of the Transmission Assets. A newsletter, consultation brochure and PEIR NTS were also available with the aim of simplifying the key elements of the PEIR. These materials were produced using plain English and, where appropriate, made strong use of images and graphics.
- 4.7.5.7 Engagement through the Evidence Plan Process has continued throughout the EIA process, including Expert Working Groups attended by local planning authorities and regulatory bodies. Details are provided in Volume 1, Chapter 5: Environmental assessment methodology of the ES (document reference F1.5).
- 4.7.5.8 Members of the public raised particularly concerns over the lack of consultation with the local MP and schools. The Applicants response can be found in the themed response table at Annex E1.16.1.

4.7.6 Introduction (PEIR Volume 1, Chapter 1)

- 4.7.6.1 No responses were received during statutory consultation which related to this topic and chapter of the PEIR.

4.7.7 Policy and legislation context (PEIR Volume 1, Chapter 2)

- 4.7.7.1 Feedback relating to policy and legislation was provided by Lancashire County Council, Blackpool Airport, the MMO, Kirkham Town Council, PWILs, and section 47 organisations and members of the public.
- 4.7.7.2 All section 42 feedback received against this topic, alongside the Applicants' response can be seen in Annex E1.16.3. Section 47 response themes

against this topic, alongside the Applicants' response, can be seen at Annex E1.16.1.

Summary of feedback and Applicants' response

- 4.7.7.3 Feedback provided further clarity regarding the regulatory regimes as well as the Licensing and Enforcement Authorities. The feedback from the Regulators highlighted that the applications being made should be specific to the application remit and should be comprehensive in the parameters and phases being assessed, as well as the timeframe. To address some of the potential impacts, relevant standard conditions have been recommended. The Applicants note the clarifications regarding regulatory drivers. These comments have been taken into consideration in the drafting of the application.

Construction in designated Areas of Separation and Green Belt land with the wider impact on homes and the openness of the Green Belt.

- 4.7.7.4 Overarching responses were also received setting out concerns that the proposal did not take into consideration local policy, particularly but not limited to, the Green Belt and Area of Separation.
- 4.7.7.5 The policy and legislative background to the application and that which has informed assessments can be found in the Planning Statement (document reference J28) and Volume 1, Chapter 2 of the ES (document reference F1.2).
- 4.7.7.6 Following consultation, the onshore export cable corridor has been refined, reducing the draft order limits and land take.
- 4.7.7.7 Specifically with regards to the Green Belt, it is acknowledged that the proposed cable route passes through Green Belt land and the proposed onshore substations also fall within Green Belt. A consideration of alternative routes and substation siting is made as part of the Site Selection chapter of the ES (Volume 1, Chapter 4, document reference F1.4) which concluded this is the preferred route and location for the cable and the substations.
- 4.7.7.8 An assessment regarding the impact on the purposes and openness of the Green Belt, alongside a Very Special Circumstances assessment is set out within the Planning Statement (document reference J28).
- 4.7.7.9 Following refinements of the Transmission Assets, land within the Area of Separation is no longer required for the onshore substations.

4.7.8 Project description (PEIR Volume 1, Chapter 3)

- 4.7.8.1 Feedback on matters relating to site selection and the alternative considered was provided by Natural England, Northwest Wildlife Trust, MMO, Trinity House, Stena Line, Oil and Gas Operators, Fylde Council, South Ribble Council, Freckleton Parish Council, Newton with Clifton Parish Council, Ribble Steam Railway, and section 47 organisations and members of the public.

4.7.8.2 All section 42 feedback received against this topic, alongside the Applicants' response can be seen in Annex E1.16.4. Section 47 response themes against this topic, alongside the Applicants' response, can be seen at Annex E1.16.1.

Summary of feedback and Applicants' response

Classification of the Offshore Substation Platforms

4.7.8.3 A reoccurring theme raised by section 42 consultees was the confusion caused by having the offshore substation platforms (OSPs) in both the Transmission Assets and Generation Assets design envelope.

4.7.8.4 As detailed in Volume 1, Annex 4.2: Selection and refinement of offshore infrastructure (document reference F1.4.2), the OSPs included in the Transmission Assets PEIR were removed from the project design and no longer form part of the Transmission Assets application. The OSPs are now solely included in the Morgan Offshore Wind Project: Generation Assets DCO and the Morecambe Offshore Windfarm: Generation Assets DCO.

Impacts to soft sediments, particularly within Fylde MCZ and employing mitigation hierarchy

4.7.8.5 A reoccurring theme raised by section 42 consultees was that parameters for sandwave clearance and cable protection was high across the Transmission Assets, especially within the designated Fylde MCZ.

4.7.8.6 Post-PEIR design refinements have reduced the amount of sandwave clearance across the Transmission Assets as a whole to 9% of the entire route (reduced from 60% for Morgan Offshore Wind Project and 30% for Morecambe Offshore Wind Farms). Further commitments have been made to reduce these parameters even further within the Fylde MCZ with up to 5% of the route through the Fylde MCZ possibly requiring sandwave clearance (CoT47).

4.7.8.7 Post-PEIR design refinements have reduced the amount of cable protection across the Transmission Assets as a whole to 10% of the entire route (reduced from 20% for Morgan Offshore Wind Project and 15% for Morecambe Offshore Wind Farms). Further commitments have been made to reduce these parameters even further within the Fylde MCZ with up to 3% of the route through the Fylde MCZ possibly requiring cable protection for ground conditions (CoT47).

4.7.8.8 Further details on avoidance of designated sites and reduction of impacts in lines with the mitigation hierarchy are provided in Volume 1, Annex 4.2: Selection and refinement of offshore infrastructure (document reference F1.4.2).

Cable Crossings within the Fylde MCZ

4.7.8.9 Section 42 consultees raised that further information was required in regard to potential cable crossings, specifically any overlap with MPAs.

4.7.8.10 An offshore crossing schedule is provided in Volume 1, Annex 3.1 (document reference F1.3.1) which details the existing assets within the Offshore Order Limits with further details on the crossings required including within the Fylde MCZ provided in Volume 1, Chapter 3: Project description. The reasoning for the crossing requirements within the Fylde MCZ are discussed in Volume 1, Annex 4.2: Selection and refinement of offshore infrastructure (document reference F1.4.2).

Contingency for HDD failure at landfall

4.7.8.11 Section 42 consultees raised that HDD can fail and consideration should be given to the worst case scenario should failure occur within designated sites and identify remedial measures for failure.

4.7.8.12 At PEIR, the landfall installation methodology was by HDD or equivalent trenchless techniques. For the DCO application, the Applicants have selected the direct pipe trenchless technique. Direct pipe results in a shorter installation duration and less interaction with the beach (up to two weeks of beach works per cable) which minimises disruption to public access and environmental impacts upon designated features of the Ribble and Alt Estuary Special Protection Area (SPA), Ribble and Alt Estuary Ramsar site, Ribble Estuary SSSI, and Lytham St Annes Dunes SSSI. Further details are provided in Volume 1, Annex 4.1: Selection and refinement of cable landfall (document reference F1.4.1).

Ribble Crossing HDD

4.7.8.13 Section 42 consultees raised concerns that the Ribble Crossing HDD could impact the protected riverbed of the Ribble Estuary MCZ and smelt (protected feature).

4.7.8.14 The Ribble Estuary crossing will be undertaken by direct pipe or micro tunnel trenchless installation techniques, and the works will be bank to bank (i.e. no works will take place in the water) (CoT90 within the Commitments Register in Volume 1, Annex 5.3). There will be no potential for impacts to the smelt feature of the Ribble Estuary MCZ which could undermine the conservation objectives. Further details of the trenchless technique methodologies is provided in Volume 1, Chapter 3: Project description of the ES (document reference F1.3).

4.7.8.15 A reoccurring theme raised by section 47 consultees was questioning why the Fylde coast for the landfall and associated infrastructure. This is addressed in Annex E1.16.1.

4.7.9 Site selection and consideration of alternatives (PEIR Volume 1, Chapter 4)

4.7.9.1 Feedback regarding site selection and alternatives was provided by Natural England, Northwest Wildlife Trust, Oil and Gas Operators, Lancashire County Council, Fylde Council, South Ribble Borough Council, Freckleton Parish Council, Blackpool Airport, National Farmers Union, Newton with Clifton

Parish Council and other section 47 organisations and members of the public.

- 4.7.9.2 All section 42 feedback received against this topic, alongside the Applicants' response can be seen in Annex E1.16.5. Section 47 response themes against this topic, alongside the Applicants' response, can be seen at Annex E1.16.1.

Summary of feedback and Applicants' response

- 4.7.9.3 Consultees identified additional receptors, constraints and assessments that should be included within the Environmental Statement as well as additional mitigation measures. Additional clarification was sought on some of the site selection decisions, including the landfall site, the Point of Interconnection at Penwortham (rather than, for example, at Heysham Nuclear Power Station), the substation locations and the decision not to bring the cables along the River Ribble.
- 4.7.9.4 A reoccurring theme raised by section 42 consultees was the siting of the offshore booster station search areas. Concerns were raised that the more easterly location was within the Liverpool Bay SPA, closer to the Fylde MCZ, and that it may create a risk to navigation due to it being isolated from other infrastructure; whilst the westerly location was in closer proximity to oil and gas infrastructure with the potential to affect oil and gas activities. In response to these concerns, the Morgan Offshore Booster Station was removed to avoid possible impacts on the Liverpool Bay SPA, Fylde MCZ, navigation, and existing oil and gas platforms.
- 4.7.9.5 Natural England suggested that the Applicants should consider micrositing, if there is capacity within the planned offshore cable corridor, for seabed features including boulders. A micrositing allowance of 500 m has been added to either side of the cable corridors.
- 4.7.9.6 Statutory consultation feedback received on the onshore substation options focussed on the size of the infrastructure and the proximity of the substations to residential areas. Fylde Council noted that the technology chosen for the substations should minimise the size of the structures required. As a result of these comments, both substations have committed to a reduction in height (max. 15m for Morgan, max. 13m for Morecambe). In addition, Morgan substation was moved further to the east to increase the distance between the infrastructure and the residential areas of Kirkham and Hall Cross. The increased distance allows more opportunity to utilise existing screening to reduce views of the substation from these areas. Strategic landscaping areas around the substations have also been identified to allow for additional tree planting and visual screening.
- 4.7.9.7 Impact to agricultural land was another key concern raised by various statutory consultees including South Ribble Borough Council, the NFU and Freckleton Parish Council. Specifically, concerns were voiced regarding loss of, or severance to, best and most versatile agricultural land. One of the guiding principles in routing the cables was to avoid best and most versatile agricultural land where possible. It is noted that impact to agricultural land is unavoidable due to the nature of the development; however, construction will

be managed sensitively through the use of a CoCP (document reference J1) and land will be reinstated after construction. With regards to Morgan substation, the relocation of the infrastructure was driven, in part, to lessen the impact on agricultural activities and holdings.

- 4.7.9.8 Statutory consultees including Lancashire County Council noted that measures taken to avoid detrimental impacts on sites, habitats, species and features of ecological value needed to be demonstratable and, where impacts are unavoidable, that mitigation and compensation is provided. Blackpool and the Fylde College noted that the onshore cable corridor should follow the route with the least impact to the environment. Throughout the design of the Project, the principles of the mitigation hierarchy of avoid, mitigate, compensate below were followed influencing the approach to the engineering and environmental design. Seven areas for ecological and or ornithological mitigation have been identified, and one area for Biodiversity Benefit.
- 4.7.9.9 Blackpool Airport commented that it was essential that the Onshore Infrastructure does not prejudice existing uses, future development proposals or the continued and future operation of the airport itself. In response to this, a large reduction has been made to the Order Limits at Blackpool Airport. Consultation between the Applicants and Blackpool Airport is ongoing to ensure that operations are not prejudiced.
- 4.7.9.10 Following a review of feedback and ongoing surveys, assessments and technical studies, the Applicant implemented design changes and the onshore cable corridor has been refined and reduced in width reducing the impact upon potentially sensitive land uses. Justification for the location of the Transmission Assets, including a description of the design and/or environmental constraints considered as part of the iterative design process, is set out set out in Volume 1, Chapter 4: Site selection and consideration of alternatives of the ES (document reference: F1.4)

4.7.10 Environmental assessment methodology (PEIR Volume 1, Chapter 5)

- 4.7.10.1 Feedback on matters relating to the EIA methodology was provided by Natural England, NRW, the Isle of Man Government and nearby offshore wind farms.
- 4.7.10.2 The key issues raised relevant to the EIA Methodology which have been identified during the statutory consultation include:
- inconsistencies in magnitude and sensitivity scores;
 - cumulative impacts with other existing and proposed offshore wind farms within the Irish Sea; and
 - inclusion of Mooir Vannin Offshore Wind Farm in the cumulative impact assessment.
- 4.7.10.3 All section 42 feedback received against this topic, alongside the Applicants' response can be seen in Annex E1.16.6 (note there is no table associated with feedback form; no responses on EIA methodology were received via the

feedback form method). Section 47 response themes against this topic, alongside the Applicants' response, can be seen at Annex E1.16.1.

Summary of feedback and Applicants' response

Inconsistencies in magnitude and sensitivity scores

- 4.7.10.4 NRW and Natural England noted the use of dual magnitudes. Both highlighted that in some cases non-significant and significant effects can result from the same combination of magnitude and sensitivity, without further justification when lower effect categories are chosen. NRW requested that detailed clarification and justification should be provided.
- 4.7.10.5 Natural England highlighted that there is inconsistency in assigning magnitude and sensitivity scores, that in some cases, conclusions on the assessment are made without a robust evidence and justification. Natural England requested that the submitted ES should revise and clearly outline the assessment methodology, apply a consistent approach and use evidence to support the assessment conclusions.
- 4.7.10.6 NRW also highlighted that definitions need to be provided for keywords used to make assessment conclusions such as: "short term", "temporary", "small scale", "regional".
- 4.7.10.7 The Applicants have ensured that definitions are provided and a consistent approach is taken across all chapters in the ES (document reference F1 to F4).

Cumulative Impacts with other existing and proposed offshore windfarms within the Irish Sea

- 4.7.10.8 Feedback cited the importance of ensuring that all environmental impacts of the Transmission Assets are properly and fully assessed including any potential cumulative or in combination effects. This relates to both the Generation Assets and also existing and proposed developments associated with the parties providing feedback.
- 4.7.10.9 In terms of cumulative assessments, a series of scenarios have been examined which cover whole project impacts and cumulative impacts of projects and plans selected as relevant based upon the results of a screening exercise. These scenarios are set out below and cover the full range of potential cumulative impacts.
- Transmission Assets together with Morecambe Offshore Windfarm: Generation Assets only.
 - Transmission Assets together with Morgan Offshore Wind Project: Generation Assets only.
 - Transmission Assets together with Morgan Offshore Wind Project: Generation Assets and Morecambe Offshore Windfarm: Generation Assets.
 - Transmission Assets together with Morgan Offshore Wind Project: Generation Assets and Morecambe Offshore Windfarm: Generation

Assets together with Tier 1, Tier 2 and Tier 3 projects, plans and activities.

- 4.7.10.10 The Applicants confirm that the Cumulative Effects Assessment (CEA) methodology includes a tiered approach to assessment of projects, plans and activities. The CEA methodology is described further in Volume 1, Chapter 5: EIA methodology of the Environmental Statement (document reference F1.5).

Inclusion of Moir Vannin Offshore Wind Farm in the cumulative impact assessment.

- 4.7.10.11 Several stakeholders requested that the Applicants include the proposed Moir Vannin Offshore Wind Farm within the cumulative impact assessments.
- 4.7.10.12 In the absence of a publicly available scoping report Moir Vannin Offshore Wind Farm was included as a Tier 3 project in the PEIR. Following the statutory consultation on the PEIR, the Moir Vannin developer, Ørsted, made project information available to the Applicants in advance of their scoping report being issued on 18 October 2023. The Applicants can confirm that the Moir Vannin Offshore Wind Farm (scoping boundary) is considered in the more detailed cumulative effects assessment at Tier 2, using the information provided in the associated scoping report. Moir Vannin UK Transmission Assets are considered in the cumulative effects assessment at Tier 3.

4.7.11 Physical processes (PEIR Volume 2, Chapter 1)

- 4.7.11.1 Feedback on matters relating to physical processes was provided by MMO, Natural England, NRW, CEFAS, Environment Agency, the Isle of Man Government, North West Wildlife Trust, wind farm operators and Blackpool & The Fylde College.
- 4.7.11.2 As part of the EPP and wider technical engagement activities, the Benthic Ecology, Fish and Shellfish and Physical Processes EWG was established with representatives from the key regulatory bodies and their advisors (see **Table 3.5** for participants).
- 4.7.11.3 The key issues raised relevant to the physical processes which have been identified during the statutory consultation include:
- potential impacts of significant amounts of sandwave clearance, and seabed preparation;
 - potential impacts of cable protection particularly within Fylde MCZ;
 - potential impacts of cable installation to landfall and beach morphology, including bentonite release and use of cable protection; and
 - potential impacts due to secondary scour.
- 4.7.11.4 All section 42 feedback received against this topic, alongside the Applicants' response can be seen in Annex E1.16.7. Section 47 response themes

against this topic, alongside the Applicants' response, can be seen at Annex E1.16.1.

Summary of feedback and Applicants' response

Potential impacts of significant amounts of sandwave clearance, and seabed preparation

- 4.7.11.5 In response to the PEIR, it was noted that the maximum design scenario (MDS) presented for sandwave clearance and other seabed preparation activities (within and outside of protected areas) was large. Natural England advised all efforts should be made to avoid areas of sandwaves or minimise the need for clearance by micro-routing cables, and that full consideration should also be given to relocation of any disposal material and impacts that may have.
- 4.7.11.6 Refinements made between the PEIR and final application have significantly reduced the requirements for sandwave clearance across the offshore export cable, from 60% at PEIR to 9% for the Morgan export cables and from 30% at PEIR to 9% for the Morecambe export cables with a commitment to a maximum of 5% sandwave clearance within the Fylde MCZ.

Potential impacts of cable protection particularly within Fylde MCZ

- 4.7.11.7 Feedback was received regarding the location of cable protection along the cable corridor particularly with respect to Fylde MCZ. It was welcomed that project commitments will include measures to limit the extent of cable protection within the Fylde MCZ, whilst the preferred option for cable protection is cable burial. Natural England noted that if the project cannot avoid or reduce the level of interaction with Fylde MCZ, they strongly advise that all feasible steps to reduce the level of cable protection are taken and the need to mitigate for processes impacts is embedded in the project design.
- 4.7.11.8 Through the cable routing of the offshore export cables and selection of landfall relating to the Transmission Assets, the Applicants have sought to avoid areas that would be most susceptible to construction, operation and maintenance, and decommissioning activities (such as cable installation). Whilst the cable corridor crosses the Fylde MCZ, it does so at its narrowest point to minimise interaction. Transmission Assets changes since PEIR has reduced the cable protection from 20% to 10% for the Morgan export cables and from 15% to 10% for the Morecambe export cables. The Applicants have made a commitment to limit this allowance to a maximum of 3% in the Fylde MCZ (excluding cable crossings). An Outline Cable Burial Risk Assessment (document reference J14) and Burial Assessment Study has been developed, which forms part of the Offshore Outline Cable Specification and Installation Plan (document reference J15).

Potential impacts of cable installation to landfall and beach morphology, including bentonite release and use of cable protection

- 4.7.11.9 Natural England observed that from experience on other windfarms, HDD can fail on occasion. Therefore, advised that the Applicants should ensure that the worst case scenario at landfall takes this into consideration. It was also noted by Natural England that the project design should consider a range of engineering options and implement the most appropriate, particularly with respect to cable protection suited to areas with active sediment transport regimes.
- 4.7.11.10 HDD is no longer proposed for the construction at landfall. The offshore export cables will be installed using trenchless techniques from the transition joint bays at Blackpool Airport to an exit location on the beach. Although open-cut trenching represents the MDS, cable installation within the intertidal area may require the use of trenchless techniques for landfall. In the case that trenchless techniques are used, the volume of bentonite released would be controlled and mitigated using sheet piling to contain drilling fluids, as described within the Outline Bentonite Breakout Plan (document reference J1.13) as part of the Outline Code of Construction Practice (document reference J1) submitted with the application.
- 4.7.11.11 Project commitments also state that no foreign material will be placed on the bed's surface in the inter-tidal region and low profile/tapered cable protection would be employed in shallow water should this be required. Where practicable the requirements will be compliant with the Maritime and Coastguard Agency (MCA) navigation guidance which includes that there will be no more than a 5% reduction in water depth (referenced to Chart Datum) at any point along the cable route (MCA, 2021) without prior consultation with the MCA and licensing authorities.

Potential impacts due to secondary scour

- 4.7.11.12 Feedback raised concerns that the PEIR project description only referred to scour protection and no consideration had been given to the potential for secondary scour. Natural England advised that secondary scour protection impacts are scoped in and included in the MDS parameters.
- 4.7.11.13 This impact was originally scoped out of the assessment, however, following stakeholder feedback, secondary scour has been considered further. The only infrastructure capable of resulting in primary scour under the scope of the Transmission Assets relates to that of cable protection for which scour protection measures are included. The cable protection measures will be subject to engineering design to ensure they minimise as much as practical the occurrence of scour, to such a degree that it will not impact upon seabed morphology.

4.7.12 Benthic subtidal and intertidal ecology (PEIR Volume 2, Chapter 2)

- 4.7.12.1 Feedback on matters relating to benthic subtidal and intertidal ecology and the Marine Conservation Zone (MCZ) Screening and Stage 1 Assessment

Report was provided by the Environment Agency, the MMO, the Planning Inspectorate, Natural England, Natural Resources Wales, the Isle of Man Department of Infrastructure, Cefas and the Northwest Wildlife Trust.

4.7.12.2 The key issues raised relevant to benthic subtidal and intertidal ecology and the MCZ Screening and Stage 1 Assessment Report which have been identified during the statutory consultation include:

- potential impact of temporary habitat disturbance/ loss associated with seabed preparation activities;
- potential impacts on the Fylde MCZ due to cable protection and cable crossings (and associated long term habitat loss);
- potential impacts on the Fylde MCZ due to sandwave clearance (and associated temporary habitat loss/disturbance); and
- potential impacts associated with hard infrastructure being left *in situ* following the decommissioning phase.

4.7.12.3 All section 42 feedback received against this topic, alongside the Applicants' response can be seen in Annex E1.16.8. Section 47 response themes against this topic, alongside the Applicants' response, can be seen at Annex E1.16.1.

Summary of feedback and Applicants' response

Potential impact of temporary habitat disturbance/loss associated with seabed preparation activities

4.7.12.4 Natural England raised concerns regarding the footprint of sandwave clearance and seabed preparation proposed for the Transmission Assets and encouraged refinement of the maximum design scenario (MDS). Natural England also raised concerns regarding the maximum design scenario (MDS) for boulder clearance activities and whether the fate of removed boulders had been assessed, and whether Unexploded Ordnance (UXO) clearance had been assessed.

4.7.12.5 Refinement has been undertaken since PEIR, including a reduction in the MDS for sandwave clearance. The Applicants have committed to a significant reduction for sandwave clearance (and associated temporary habitat disturbance) from 60% to 9% for the Morgan export cables and from 30% to 9% for the Morecambe export cables. The width of the sandwave clearance corridor has also reduced from 104 m to 60 m for the Morgan export cables and 48 m for the Morecambe export cables. This has contributed to a decrease in the amount of temporary habitat disturbance/loss associated with cable installation (and associated seabed preparation activities) from 35,112,000 m² at PEIR to 11,331,680 m² for the ES.

4.7.12.6 Additionally, there has been a corresponding decrease in the area affected by sandwave clearance material deposition associated with export cables from 16,326,400 m² at PEIR to 2,853,504 m² at ES.

4.7.12.7 Volume 1, Chapter 3: Project description of the ES (document reference: F1.3), states that, during boulder clearance, boulders will be side cast away

from the immediate location of the cable infrastructure. This methodology would be more targeted and would result in less habitat disturbance than that assumed for the MDS. Boulder clearance is therefore assessed in Volume 2, Chapter 2: Benthic subtidal and intertidal ecology of the ES (document reference F2.2) as temporary habitat disturbance (rather than loss) as the process will effectively redistribute boulders and cobbles within discrete areas. Given the patchiness of the distribution of boulders in the survey area, this is considered unlikely to represent a significant shift in the baseline and, since no sediment/substrate is being removed, this will not act as a barrier for the recovery of any epifaunal communities impacted during the process.

- 4.7.12.8 The assessment presented in Volume 2, Chapter 2: Benthic subtidal and intertidal ecology of the ES (document reference F2.2) has been updated since submission of the PEIR to include an assessment of temporary habitat loss/disturbance arising from UXO clearance to address feedback raised.

Potential impacts on the Fylde MCZ due to cable protection and cable crossings (associated long term habitat loss)

- 4.7.12.9 Natural England and the North West Wildlife Trust provided detailed responses relating to the impacts on the Fylde MCZ including concerns relating to the extent of cable protection and cable crossings and associated long term habitat loss. Natural England requested a commitment to remove cable protection as part of the Decommissioning Plan and the provision of a Cable Burial Risk Assessment (CBRA) with the Application.
- 4.7.12.10 As set out above, refinement of the Transmission Assets project design parameters has been undertaken since submission of the PEIR, significantly reducing the requirements for cable protection (and associated long term habitat loss) within the Fylde MCZ. The aim is to bury all cables in the first instance and only where this is unsuccessful would cable protection be required. Cable protection within the MCZ will very much be a contingency measure.
- 4.7.12.11 The MDS assumes up to one cable crossing within the Fylde MCZ (for all four Morgan export cables) and all within the subtidal mud feature of the MCZ. There are no cable crossings associated with the Morecambe export cables within the Fylde MCZ. The Applicants have committed to ensuring that all external cable protection used within the Fylde MCZ will be designed to be removable on decommissioning. An Outline Cable Burial Risk Assessment (document reference J14) and Burial Assessment Study has been developed which forms part of the Outline Offshore Cable Specification and Installation Plan (document reference J15).

Potential impacts on the Fylde MCZ due to sandwave clearance (and associated temporary habitat loss/disturbance).

- 4.7.12.12 In their detailed responses, Natural England also raised concerns relating to the extent of sandwaves clearance, and associated temporary habitat loss/disturbance, within the Fylde MCZ.
- 4.7.12.13 As set out above, the refinement of the Transmission Assets project design parameters that has been undertaken since submission of the PEIR, has included a reduction in the MDS for sandwave clearance (and associated

temporary habitat loss/disturbance) within the Fylde MCZ. Overall the amount of temporary habitat disturbance/loss which may occur within the Fylde MCZ as a result of the Transmission Assets has reduced by more than 70% from 8,532,443 m² in the PEIR to 2,496,880 m² in the ES.

- 4.7.12.14 A full assessment of impacts to the Fylde MCZ is presented within the Transmission Assets MCZ Screening and Stage 1 Assessment Report (document reference E4).

Potential impacts associated with hard infrastructure being left *in situ* following the decommissioning phase.

- 4.7.12.15 Natural England raised concerns that leaving cable and scour protection *in situ* would equate to permanent changes in the benthic habitats within the site.
- 4.7.12.16 The Project has committed to ensuring that all external cable protection used within the Fylde MCZ will be designed to be removable on decommissioning with the requirement for removal agreed with stakeholders and regulators at the time of decommissioning. Cable protection remaining *in situ* outside the MCZ has been assessed as permanent habitat alteration in Volume 2, Chapter 2: Benthic subtidal and intertidal ecology of the ES (document reference F2.2) and the increased risk of introduction of invasive non-native species (INNS) in the decommissioning phase has also been assessed.

4.7.13 Fish and shellfish ecology (PEIR Volume 2, Chapter 3)

- 4.7.13.1 Feedback on matters relating to fish and shellfish ecology was provided by the Planning Inspectorate, the MMO, Natural Resources Wales, Natural England, Cefas and the Territorial Seas Committee and section 47 organisations and members of the public.
- 4.7.13.2 The key issues raised relevant to fish and shellfish ecology which have been identified during the statutory consultation include:
- consideration needs to be given to diadromous species, with a focus on their migration routes in relation to the Transmission Assets;
 - impact of underwater sound on herring, sandeel, and cod spawning grounds;
 - Consideration of potential mitigation measures to reduce underwater sound impacts;
 - potential impacts of seabed preparation and construction activities on commercially important king and queen scallop populations and other fish and shellfish species; and
 - consideration of spawning and migration periods in assessment of impact.
- 4.7.13.3 All section 42 feedback received against this topic, alongside the Applicants' response can be seen in Annex E1.16.9. Section 47 response themes against this topic, alongside the Applicants' response, can be seen at Annex E1.16.1.

Summary of feedback and Applicants' response

Consideration needs to be given to diadromous species, with a focus on their migration routes in relation to the Transmission Assets

- 4.7.13.4 As a result of feedback diadromous species have been considered in the assessment (Volume 2, Chapter 3 of the ES (document reference F2.3)) where relevant. Specifically, all diadromous fish considered in the assessment, including qualifying features of nearby designated sites such as Allis and Twaite shad, have been chosen based on data showing their presence within close proximity to the Transmission Assets. Migration routes for diadromous fish are considered in the impact assessment with potential barriers to migration caused by the Transmission Assets and other projects assessed fully.

Impact of underwater sound on herring and cod and their respective spawning grounds

- 4.7.13.5 Underwater sound was raised as a potential impact by several stakeholders, with a need highlighted to focus on the commercially important herring and cod species, which have spawning grounds across the study area. Refinement of the PDE since PEIR has taken place and the features which required pile-driving are no longer included in the application, reducing the MDS for impacts on fish. In the sound modelling performed to inform the assessment of the impact of underwater sound on fish and shellfish, fish were modelled separately as static (including eggs and larvae) and moving receptors. As a precautionary approach, the largest outputs from this modelling informed the significance of effect, with consideration given to the potential disturbance of spawning over sequential spawning seasons. The modelling assessed impacts in terms of mortality, recoverable injury, temporary threshold shifts, permanent threshold shifts, and behavioural responses.
- 4.7.13.6 For Atlantic herring spawning, a highly precautionary sound threshold for behavioural disturbance was used to inform the underwater sound impact assessment. A less precautionary sound threshold was used to assess herring and cod, which are considered more sensitive to the sound pressure component of underwater sound, with the risk of behavioural effects in the intermediate and far fields therefore being greater for this species. As a result of this, the sensitivity of herring and cod to underwater sound impacts are assessed as high with no significant effects predicted for herring or cod and their spawning grounds.

Consideration of potential mitigation measures to reduce underwater sound impacts

- 4.7.13.7 Refinements since PEIR, as set out above, removing pile-driving has reduced the range at which mortality, recoverable injury, and behavioural effects could occur to these fish species from received sound levels. Mitigation measures have been outlined and justified in the Environmental Statement. No additional measures have been considered necessary for cod or herring spawning.

Potential impacts of seabed preparation and construction activities on commercially important king and queen scallop populations and other fish and shellfish species

- 4.7.13.8 Sensitive shellfish receptors are considered where relevant in the underwater sound assessment. Specifically, data from annual scallop surveys undertaken by Agri-food and Biosciences Institute (AFBI) and Bangor University were reviewed to characterise the shellfish assemblages within the study area, which includes the Manx waters to the north of the Transmission Assets.
- 4.7.13.9 The potential impacts from seabed preparation and construction activities have been considered in the temporary habitat loss, increase in suspended sediment concentration and long term habitat loss impacts, in relation to each fish species important ecological feature identified for assessment. Habitat suitability for spawning of herring and sandeel species within the study area was determined using online and site-specific survey data, to help inform assessment of these potential impacts on these species with no significant effects predicted.

Consideration of spawning grounds and migration periods in assessment of impacts

- 4.7.13.10 Spawning and nursery grounds of important ecological feature species are considered in the baseline characterisation where data sources are available. These characterisations of spawning and nursery grounds include the peak spawning months, mapped extents of the grounds, and overlaps between the impacts of the Transmission Assets and these areas.
- 4.7.13.11 Migration routes for diadromous fish are considered in the impact assessment, with potential barriers to migration caused by the Transmission Assets and other projects given consideration with no significant effects predicted.
- 4.7.13.12 Based on consultation responses, long-term Northern Ireland Herring Larvae Survey data from the north Irish Sea have been presented as bubble plots. This data was supplemented by relevant up to date references and guidance notes, including resources highlighted from consultation, alongside sediment data suitability for spawning in the baseline to provide an evidence base for assessing impacts on herring larvae and spawning grounds with no significant effects predicted.

4.7.14 Marine mammals (PEIR Volume 2, Chapter 4)

- 4.7.14.1 Feedback on matters relating to marine mammals was provided by Natural England, the MMO, NRW, Members of the Legislative Council (MLC) (Legislative Council of the Isle of Man), Blackpool & The Fylde College and section 47 organisations and members of the public.
- 4.7.14.2 The key issues raised relevant to marine mammals which have been identified during the statutory consultation include:
- feedback related to marine mammal chapter structure;

- feedback related to baseline characterisation;
- feedback related to potential impacts of underwater sound generated by piling activities;
- further assessment to support conclusions related to impacts from underwater sound from vessels; and
- feedback related to sound mitigation measures.

4.7.14.3 All section 42 feedback received against this topic, alongside the Applicants' response can be seen in Annex E1.16.10. Section 47 response themes against this topic, alongside the Applicants' response, can be seen at Annex E1.16.1.

Summary of feedback and Applicants' response

Feedback related to marine mammal chapter structure

- 4.7.14.4 Natural England, NRW and the MMO raised concerns about the structure of the marine mammal chapter, highlighting that the chapter was hard to follow and often confusing, particularly given the extensive amount of detailed material to review. Natural England highlighted that there are sections that refer to the results of other assessments (Morgan Offshore Wind Generation Assets and Morecambe Offshore Windfarm Generation Assets) but these are not clearly presented in a way that allows comparison and context.
- 4.7.14.5 In light of this feedback, the structure of the marine mammals chapter has been revised and updated. With the removal of the Morgan Offshore Booster Station and the OSPs from the Project Description, and the associated removal for the need to assess the potential for injury and disturbance from underwater sound generated from piling, this has simplified Volume 2, Chapter 4: Marine mammals of the ES (document reference F2.4).

Feedback related to baseline characterisation

- 4.7.14.6 Natural England and NRW highlighted that densities from Waggitt *et al.* (2019/2020) should not be used for absolute densities/is not the most appropriate density to take forward in the absence of site-specific survey data. They requested that densities are revised upon inclusion of SCANS IV (2023), the Marine Mammal Atlas (Evans and Waggitt, 2023), two years of survey data at Morecambe Offshore Windfarm: Generation Assets. Natural England also highlighted that if survey data for Mona Offshore Wind Project becomes publicly available, it should be included in the list of the references.
- 4.7.14.7 Natural England advised that the most appropriate density (i.e. most precautionary unless justified otherwise) is taken forward to assessment in the submitted ES. NRW recommended the use of Evans and Waggitt [2023]
- 4.7.14.8 Natural England and NRW also noted the variability in density estimates for harbour porpoise over a relatively small area and requested that the submitted ES provide further detail behind the variability of harbour porpoise density, or that a single density estimate is selected for the assessment.

- 4.7.14.9 Following this feedback, the list of data sources has been updated to include SCANS IV (Gilles *et al.*, 2023), Welsh Marine Mammal Atlas (Evans and Waggitt, 2023), IAMMWG (2022, 2023), SCOS, 2022 and digital aerial survey (DAS) data from two years of DASs at Mona Offshore Wind Farm. These data sources have been included in Volume 2, Annex 4.1: Marine Mammal Technical Report, and Volume 2, Chapter 4: Marine Mammals, of the Environmental Statement. Cetacean densities provided in the PEIR have been replaced with more precautionary estimates from the updated Welsh Marine Mammal Atlas (Evans and Waggitt, 2023). All densities have been presented to and agreed with the Marine Mammal EWG.

Feedback related to potential impacts of underwater sound generated by piling activities

- 4.7.14.10 A number of comments from Natural England, NRW (and others) relate to the potential impacts of underwater sound generated by piling activities. With the removal of the Morgan Offshore Booster Station and the OSPs from the Project Description, there is no need to assess the potential for injury and disturbance from underwater sound generated from piling within the Environmental Statement.

Further assessment to support conclusions related to impacts from underwater sound from vessels

- 4.7.14.11 Natural England highlighted that the current vessel baseline needs to be quantified and presented for context and comparison. NRW noted that the vessel impact pathway needs adequate assessment particularly given that there will be an estimated 700 vessels in the area from the development alone.
- 4.7.14.12 Concerns were raised regarding potential inaccuracies and assumptions associated with impacts from underwater sound from vessels, including the need for further explanation of how additional project vessels may cause disturbance to marine mammals and the use of the term habituation to disturbance when assessing impact from underwater sound due to vessels.
- 4.7.14.13 As a result of the feedback on the assumptions around marine mammal habituation to sound from vessels, the language regarding use of the terminology 'habituation to disturbance' has been amended. Additional discussion in relation to Wisniewska (2018) and other relevant studies from the published literature have been provided in Volume 2, Chapter 4: Marine mammals of the ES (document reference F2.4). Furthermore, the chapter has provided further quantification of the baseline levels of activity and considered a more detailed approach to assessing vessel sound to provide further quantification of the potential impacts with no significant effects predicted for marine mammals from elevated underwater sound due to vessel use and other sound-producing activities.

Feedback related to sound mitigation measures

- 4.7.14.14 Natural England highlighted that the Outline Marine Mammal Mitigation Protocols (MMMP) should consider all available mitigation measures to

minimise the impact of underwater noise such as noise abatement. The recommendation for noise abatement measures was also highlighted by the MMO, NRW and North West Wildlife Trust.

- 4.7.14.15 The Applicants have developed an Outline MMMP (document reference J18) which presents the range of measures adopted as part of the Project to reduce or eliminate the risk of auditory injury effects of underwater sound. The Outline MMMP also establishes a process of investigating options to manage underwater sound levels, in consultation with the licensing authority and SNCBs and agreeing prior to construction, mitigation measures that will be implemented to reduce the magnitude of impacts such that there will be no residual significant effect from the project. The options will continue to be explored for mitigating UXO clearance sound post consent, at a time when more detailed information is available. A commitment to noise abatement systems might be considered as part of a stepped strategy post consent and following the mitigation hierarchy.

4.7.15 Offshore ornithology (PEIR Volume 2, Chapter 5)

- 4.7.15.1 Feedback on matters relating to offshore ornithology was provided by a number of stakeholders including the Planning Inspectorate, Isle of Man Government, Natural England, Isle of Man Department of Infrastructure, NRW Advisory and the Territorial Seas Committee and section 47 organisations and members of the public.
- 4.7.15.2 Following statutory consultation feedback, an EWG took place on 06 February 2024, which included Natural England, NRW, the MMO, Cefas and the JNCC to discuss feedback.
- 4.7.15.3 The key issues raised relevant to offshore ornithology which have been identified during the statutory consultation include:
- data selection for ornithological interests;
 - cumulative assessment of red-throated diver and common scoter; and
 - bird survey data and calculation techniques.
- 4.7.15.4 All section 42 feedback received against this topic, alongside the Applicants' response can be seen in Annex E1.16.11. Section 47 response themes against this topic, alongside the Applicants' response, can be seen at Annex E1.16.1.

Summary of feedback and Applicants' response

Data selection for ornithological interests

- 4.7.15.5 The Isle of Man government mentioned that bird species manx shearwater, guillemot, razorbill and kittiwake have been noted in considerable number in previous surveys of developments in the area and within foraging range of their Isle of Man colonies. The committee recommended use of the use of this data for consideration of the effects.
- 4.7.15.6 The TSC would also like the Applicants to give attention to the Manx Marine Environment Assessment; as more detail in specific areas deserves review.

- 4.7.15.7 Following this feedback, the Applicants have considered species as set out by the Isle of Man committee response in the ES in section 5.5.1, Volume 2, Chapter 5: Offshore ornithology of the ES (document reference F2.5). The assessment for potentially impacted species are identified in section 5.6 and 5.11 of the chapter.

Cumulative assessment of red-throated diver and common scoter

- 4.7.15.8 Natural England disagreed with the Applicants' position that no cumulative effects occur for red-throated diver and common scoter, due to the lack of spatial or temporal overlap between Transmission Assets and Tier 1 Projects. Natural England argue cumulative assessments should consider that other projects in the region exert continuous displacement effect on these highly sensitive species. Furthermore, that the number of common scoters at risk for mortality is below the threshold advised for the project-alone, but not in-combination assessments and should be carried out further. NRW advisory also cite this concern and suggest that as a matter of best practice to include vessel movements in their analysis and any mitigation.
- 4.7.15.9 The Applicants have incorporated all relevant projects in the full cumulative assessment in the ES section 5.13. Measures adopted as part of the Project include a limitation on the number of vessels during the wintering period between November and February within the Liverpool Bay SPA. An Outline Vessel Traffic Management Plan (document reference J21), and measures to minimise disturbance to marine mammals and rafting birds from vessels (document reference J16), amongst others, as discussed in section 5.8 and in the relevant assessment section 5.11 with no significant effects predicted for red-throated diver and common scoter.

Bird survey data and calculation techniques

- 4.7.15.10 Natural England noted that no site specific surveys have taken place. They highlighted the risk that additional data analysis could change the conclusions of the ES. The EWG meeting 3 also mentioned that the data included in the assessments for the Morgan Offshore Wind Project uses 12 months of data from the PEIRs, and require 24 full months of data from surveys.
- 4.7.15.11 The Applicants can confirm that 24 months of survey data has been included for key receptors.
- 4.7.15.12 Feedback noted that the study used to calculate densities of receptor species within the red line boundary relying on visual aerial survey techniques, and are no longer considered best practice. They recommend using aerial surveys carried out for characterising species densities in the Liverpool Bay SPA. The Applicants has been provided with the necessary data and amended relevant assessments.
- 4.7.15.13 Similarly feedback contested the use of adult survival rates from Horswill and Robinson (2015) to calculate predicted mortality associated with the Project of receptor species of Liverpool Bay/Bae Lerpwl SPA. Natural England contend that the species considered (red-throated diver and common scoter) are composed of birds of all ages and not just adults therefore a weighted

mean survival rate across all ages classes should be used to calculate a mean mortality rate for the population.

4.7.15.14 The Applicants have now calculated mortality assessments with mean survival rates across all age classes.

4.7.16 Commercial fisheries (PEIR Volume 2, Chapter 6)

4.7.16.1 Feedback on matters relating to commercial fisheries was provided by the MMO, Isle of Man Government, National Federation of Fishermen's Organisations, Welsh Fisherman's Association, NWIFCA, relevant fish producer organisations and other fisheries representatives as well as individual fishers, nature conservation bodies and non-governmental organisations and other sea users who operate in the area (including other energy developers) and section 47 organisations and members of the public.

4.7.16.2 The key issues raised relevant to commercial fisheries that have been identified during the statutory consultation include:

- data to inform the commercial fisheries assessment;
- importance of co-existence;
- important shellfish beds (cockle and mussel) located on the North_-West coastline; and
- spatial squeeze on commercial fisheries associated with the cumulative effects of the Transmission Assets.

4.7.16.3 All section 42 feedback received against this topic, alongside the Applicants' response can be seen in Annex E1.16.12. Section 47 response themes against this topic, alongside the Applicants' response, can be seen at Annex E1.16.1.

Summary of feedback and Applicants' response

Data to inform the assessment

4.7.16.4 In their response the Isle of Man Government commented on the data that had been used to inform the assessment and availability of Isle of Man Vessel Monitoring System (VMS) data, particularly under-15 metre vessel data. The Isle of Man Department of Infrastructure outlined the requirement for all vessels targeting scallops irrespective of size to carry VMS since 2015.

4.7.16.5 The Applicants have obtained relevant VMS data from the Isle of Man Government, which provides comprehensive coverage of Manx vessels, of all sizes, in the region. This data has now been incorporated into the Commercial fisheries technical annex of the ES (see Volume 2, Annex 6.1: Commercial fisheries technical report (document reference F2.6.1)) and has been considered in the commercial fisheries assessment (see Volume 2, Chapter 6: Commercial fisheries of the ES (document reference F2.6) with no significant effects predicted for commercial fisheries.

Importance of co-existence

- 4.7.16.6 Due to the potential impacts associated with displacement and spatial squeeze, commercial fisheries stakeholders have highlighted in their responses to consultation the importance of facilitating co-existence as far as possible to allow for continued fishing within the Transmission Assets.
- 4.7.16.7 In response to this, the Applicants have made a number of changes and commitments including the commitment to minimise the duration for which the offshore export cable corridors will be closed to vessels during construction to limit disruption to commercial fishing activities, if and where practicable. Key Project Description changes include the removal of the Morgan Offshore Booster Station entirely; therefore, removing all its associated impacts.
- 4.7.16.8 The Applicants are working to facilitate co-existence with commercial fishing stakeholders and minimise disruption as far as is practicably possible. Early engagement was established with fisheries stakeholders in June 2021 and is anticipated to continue throughout the lifetime of the Project. A Fisheries Liaison and Coexistence Plan will be developed post-consent by the Applicants with input from commercial fisheries stakeholders. An outline of this plan has been included with the Application (document reference J13).

Important shellfish beds (cockle and mussel) located on the North - West coastline

- 4.7.16.9 Feedback received commented on commercially important shellfish beds (cockle and mussels) located on the north - west coastline in proximity to the proposed transmission cable route.
- 4.7.16.10 The Applicants have obtained relevant data from the North West Onshore Fisheries and Conservation Authority, which provides comprehensive information on the spatial extent and landings for the mussel and cockle beds that are located within the commercial fisheries study area. This data has now been incorporated into the Commercial fisheries technical annex of the ES (Volume 2, Annex 6.1: Commercial fisheries technical report (document reference: F2.6.1)) and has been considered in the commercial fisheries assessment (Volume 2, Chapter 6: Commercial fisheries of the ES (document reference: F2.6) with no significant effects predicted on important shellfish beds.

Spatial squeeze on commercial fisheries associated with the cumulative effects of the Transmission Assets

- 4.7.16.11 Feedback expressed concerns regarding displacement of fishing vessels from within the Offshore Order Limits during construction, the potential cumulative effects of loss of fishing access due to regional development and potential issues of cross industry conflict in areas outside of the wind farm site.
- 4.7.16.12 The Applicants are working to facilitate co-existence with commercial fishing stakeholders and minimise disruption as far as is practicably possible. Early engagement was established with fisheries stakeholders in June 2021 and is

anticipated to continue throughout the lifetime of the Project. A Fisheries Liaison and Coexistence Plan will be developed post-consent by the Applicants with input from with commercial fisheries stakeholders. An outline of this plan has been included with the Application (document reference: J13). The Applicants have made a number of project changes and commitments including the commitment to minimise the duration for which the offshore export cable corridors will be closed to vessels during construction to limit disruption to commercial fishing activities, if and where practicable.

4.7.17 Shipping and navigation (PEIR Volume 2, Chapter 7)

- 4.7.17.1 Feedback on matters relating to shipping and navigation was provided by several stakeholders including the MCA, Trinity House Lighthouse Services, UK Chamber of Shipping, Isle of Man Government, regional groups and organisations, commercial operators, and energy developers (offshore wind farms and oil and gas).
- 4.7.17.2 As part of the consultation and wider technical engagement activities, the MNEF was established with representatives from key regulatory bodies and shipping and navigation stakeholders to discuss the Round 4 Irish Sea Wind Projects (Morgan Offshore Wind Project, Morecambe Offshore Windfarm and Mona Offshore Wind Project). The Transmission Assets also form part of the MNEF meetings, due to the relationship between the Transmission Assets and the Morgan Offshore Wind Project: Generation Assets and Morecambe Offshore Windfarm: Generation Assets.
- 4.7.17.3 The key issues raised relevant to shipping and navigation which have been identified during the statutory consultation include:
- impacts surrounding the potential location for the Morgan offshore booster station;
 - details and impacts on marine traffic of the construction and operation and maintenance base ports and associated additional marine traffic;
 - concerns over the impact to commercial shipping and routes;
 - potential impact on oil and gas operator emergency response, access routes and safety zones;
 - management of simultaneous operations; and
 - cumulative impacts of the Transmission Assets with other existing and proposed offshore wind farms within the Irish Sea on safety of navigation.
- 4.7.17.4 All section 42 feedback received against this topic, alongside the Applicants' response can be seen in Annex E1.16.13. Section 47 response themes against this topic, alongside the Applicants' response, can be seen at Annex E1.16.1.

Summary of feedback and Applicants' response

Impacts surrounding the potential location for the Morgan Offshore Booster Station

- 4.7.17.5 Several consultees, raised concerns with respect to the Morgan Offshore Booster Station and its potential proximity to their assets and impacts on shipping. As set out above, the Transmission Assets have subsequently made project design changes resulting in the removal of the Morgan Offshore Booster Station entirely; therefore, removing all its associated impacts.

Details of the construction and operation and maintenance base ports and additional marine traffic

- 4.7.17.6 It was noted by several stakeholders that the determination of the construction or operation and maintenance base ports had not been made pre-consent and, similarly, the vessel routes to and from these remained unknown. Therefore, stakeholders noted that they could not readily review the potential risk to their assets and their operations. Following the project design change in the removal of the Morgan Offshore Booster Station, the vessel numbers related to the Transmission Assets Project have reduced across construction, operation and maintenance and decommissioning phases since PEIR.
- 4.7.17.7 Following feedback, consideration of the risk of operations in isolation and cumulatively is contained within the updated NRA of the Environmental Statement, Volume 2, Annex 7.1: Navigation Risk Assessment of the ES (document reference F2.7.1). The Project will be refining options as part of future project development, as will other Round 4 Irish Sea projects (Morgan Offshore Wind Project; Generation Assets, Morecambe Offshore Windfarm: Generation Assets and Mona Offshore Wind Project). The MNEF will be continued to allow full engagement with relevant stakeholders throughout future stages of the project.

Concerns over the impact to commercial shipping and routes

- 4.7.17.8 The Isle of Man Government raised concerns over shipping and disruptions that may affect traffic inbound to Heysham. This would impact the Isle of Man's supermarket supplies and the 'just in time delivery' model that is heavily rely on.
- 4.7.17.9 The impact to commercial shipping during the three phases of the Transmission Assets Project has been assessed within the updated NRA, Volume 2, Annex 7.1: Navigation Risk Assessment of the ES (document reference F2.7.1) and Shipping and Navigation chapter, Volume 2, Chapter 7 of the ES, (document reference F2.7) submitted as part of the Application, which concluded that cable laying operations alone would not have a significant effect on regular shipping routes.

Potential impact on oil and gas operator emergency response, access routes and safety zones

- 4.7.17.10 Feedback raised concerns regarding impacts to emergency response and evacuation capability, emergency access routes, communications systems, and collision warning systems due to heightened vessel traffic and location of fixed project assets and construction activities relating to the Transmission Assets. As set out above, the design changes since PEIR resulted in the removal of the Morgan Offshore Booster Station and its potential for proximity siting near oil and gas fixed assets. The impacts with respect to shipping and navigation are limited to localised activities for cable route preparation, cable laying and protection activities, which are also discussed in the Other Sea Users chapter of the ES, Volume 2, Chapter 9 (document reference F2.9).
- 4.7.17.11 Oil and gas operators, together with other stakeholders, noted a request for ongoing engagement and discussion. Consequently, the project, as part of the joint Round 4 Irish Sea projects, will continue the MNEF to allow full engagement with relevant stakeholders throughout future stages of the Project. The emergency response and SAR impacts associated with the Transmission Assets, in isolation and cumulatively, have been considered within the updated NRA (Volume 2, Annex 7.1: Navigation Risk Assessment of the ES, document reference F2.7.1) and Shipping and Navigation chapter (Volume 2, Chapter 7 of the ES, document reference F2.7) with all effects ALARP.

Management of simultaneous operations

- 4.7.17.12 Stakeholders provided responses related to concerns over construction activities and simultaneous operations, principally oil and gas operators' decommissioning, and carbon capture and storage proposed developments. These comments centred around simultaneous operations and ensuring operational co-existence through operational management of ongoing activities in the area. Transmission Assets will contribute to an increased level of marine activity being introduced to the area, along with associated increased risks and impacts to current and proposed future operations.
- 4.7.17.13 Assessment of risk during construction, operation and maintenance and decommissioning phases has been assessed cumulatively (through the CRNRA, as previously discussed).
- 4.7.17.14 Impacts associated with the Morgan Offshore Booster Station, specifically regarding operations and activities near to oil and gas assets, have been removed following Project design changes, as previously set out. Other simultaneous operations, including construction activities of the other Round 4 Irish Sea projects (Morgan Offshore Wind Project, Morecambe Offshore Windfarm and Mona Offshore Wind Project) will be carefully managed to ensure risks resulting from increased level of marine activity and traffic being introduced to the area are minimal and mitigated. The MNEF will continue to allow full engagement with relevant stakeholders throughout future stages of the Project and commitments have been made with respect to the development of various plans, including Vessel Traffic Management Plan (VTMP) (document reference J21), Offshore Cable Specification and

Installation Plan (document reference J15) and Construction Method Statement(s).

Cumulative impacts of the Transmission Assets with other existing and proposed offshore wind farms within the Irish Sea on safety of navigation

- 4.7.17.15 In response to the consultation, the Isle of Man Government and nearby offshore wind farms raised concerns about the cumulative impacts of the Transmission Assets together with the proposed Round 4 offshore wind farms within the Irish Sea (Mona Offshore Wind Project, Morgan Offshore Wind Project: Generation Assets and Morecambe Offshore Windfarm: Generation Assets) on safety of navigation in the area, specifically on the reduction of safe navigable sea space, changes to commercial routing and high volumes of marine traffic causing increased collision risk.
- 4.7.17.16 Following the PEIR, the design changes previously set out, resulting in the removal of the Morgan Offshore Booster Station entirely has resulted in reduced construction and operation and maintenance traffic. Additionally, since PEIR, the Mona Offshore Wind Project, Morgan Offshore Wind Project: Generation Assets and Morecambe Offshore Windfarm: Generation Assets have also committed to modifications to their respective boundaries to increase navigable searoom, thereby minimising impacts to shipping and navigation stakeholders. A Cumulative Regional Navigation Risk Assessment (CRNRA) was undertaken collaboratively between the developers, which has been used in the assessment of the cumulative impacts. The ferry companies and other key stakeholders had been involved in the CRNRA process through attendance at navigation simulations and a hazard workshop. The findings of this process are reflected in the CRNRA, an appendix to the updated (Navigation Risk Assessment) NRA, (Volume 2, annex 7.1: Navigation Risk Assessment of the ES (document reference F2.7.1)) and Shipping and Navigation chapter (Volume 2, chapter 7 of the ES (document reference F2.7)) submitted as part of the Application.
- 4.7.18 Marine archaeology (PEIR Volume 2, Chapter 8)**
- 4.7.18.1 Feedback on matters relating to marine archaeology was provided by The Planning Inspectorate, MMO, and Historic England.
- 4.7.18.2 The key issues raised relevant to marine archaeology which have been identified during statutory consultation include:
- approach to the Outline Offshore Written Scheme of Investigation for Archaeology (OOWSI);
 - ensuring a holistic approach to submerged prehistoric archaeology; and
 - approach to assessment of the potential impact to Historic Seascape Character (HSC).
- 4.7.18.3 All section 42 feedback received against this topic, alongside the Applicants' response can be seen in Annex E1.16.14. Section 47 response themes against this topic, alongside the Applicants' response, can be seen at Annex E1.6.1.

Summary of feedback and Applicants' response

Approach to the Outline Offshore Written Scheme of Investigation for Archaeology

- 4.7.18.4 The Applicants have developed an OOWSI for the site-specific geophysical surveys which has been submitted to and approved by Historic England. A further OOWSI (document reference J17) has been produced as part of the submission, the development of which has been informed by consultation with Historic England through the Archaeology and Heritage Engagement Forum (AHEF).

Ensuring a holistic approach to submerged prehistoric archaeology

- 4.7.18.5 Feedback from Historic England have requested clarity on how the foreshore area relates to either offshore or onshore WSI documents. The Applicants have prepared two Outline Offshore WSI and Protocols for Archaeological Discoveries (PADs) for submission with the application and in support of both the Onshore Heritage Chapter and the Marine Archaeology Chapter. The OOWSI (document reference J17) covers the Transmission Assets Order Limits seaward of MLWS whilst the Outline Onshore and Intertidal WSI (document reference J9) covers the Transmission Assets Order Limits landward of MLWS. An AHEF was held in August 2024 to discuss and agree an aligned approach.

Approach to assessment of the potential impact to Historic Seascape Character (HSC)

- 4.7.18.6 In their feedback, Historic England advised that context for the known and the risk of encountering the unknown archaeology relating to activities that reflect the historic seascape character should be fully investigated. In an additional comment, Historic England requested that further narrative is provided in the ES assessment to explain perceptions of change drawing on historic character. Further discussion on approach to HSC was undertaken through the Offshore AHEF and advice from Historic England has been utilised in the further development of assessing effects on HSC. Additionally, the advice from Historic England has been incorporated into a refinement of the methodology and consideration of effects on HSC as presented in Volume 2, Chapter 8: Marine archaeology of the ES (document reference F2.8).
- 4.7.18.7 Approach to considering HSC has been an ongoing topic of consultation with Historic England through the pre-application stage of Transmission Assets. Methodology for HSC has been developed through AHEF meetings and applied in Volume 2, Chapter 8: Marine archaeology of the ES (document reference F2.8). This has included the use of data from Historic England via the Archaeology Data Service (ADS) to establish the HSC and assess whether or not these characteristics have the ability to accommodate change, whilst also considering the context of the seascape's present and near future character, noting that consideration of HSC has determined that the HSC can accommodate the introduction of the Transmission Assets without altering the existing characteristics of the HSC.

4.7.19 Other sea users (PEIR Volume 2, Chapter 9)

4.7.19.1 Feedback on matters relating to other sea users was provided by the Planning Inspectorate, Natural England and energy developers (oil and gas).

4.7.19.2 The key issues raised relevant to other sea users which have been identified during the statutory consultation include:

- pipeline and cable crossing/ proximity agreements;
- interaction with other offshore energy activities, specifically decommissioning of oil and gas infrastructure and Carbon Capture and Storage (CCS);
- impacts on sediment transport pathways;
- impacts on offshore microwave fixed communication links; and
- cable removal methodologies.

4.7.19.3 All section 42 feedback received against this topic, alongside the Applicants' response can be seen in Annex E1.16.15. Section 47 response themes against this topic, alongside the Applicants' response, can be seen at Annex E1.6.1.

Summary of feedback and Applicants response

Pipeline and cable crossing/proximity agreements

4.7.19.4 Engagement with relevant stakeholders is ongoing to enable co-existence. Crossing and proximity agreements (CoT51) are noted as measures adopted as part of the Transmission Assets. Protective provisions are included, where applicable, within the draft DCO.

Impacts on offshore microwave fixed communication links

4.7.19.5 Following design changes, due to the Transmission Assets not including any infrastructure above sea level, there will be no impacts on offshore microwave fixed communication links.

Cable removal methodologies

4.7.19.6 Feedback received noted that the offshore infrastructure crosses existing out of service cables which will be removed as part of the Project. A methodology was advised to be created in consultation with the asset owner. Removal methodology is included within Volume 1, Chapter 3: Project description of the ES. Key guidelines have been adhered to throughout the planning process. Further details are provided in the Cable Burial Risk Assessment (document reference J14) and the Outline Offshore Cable Specification and Installation Plan (document reference J15) .

4.7.20 Geology, hydrogeology and ground conditions (PEIR Volume 3, Chapter 1)

- 4.7.20.1 Feedback on matters relating to geology, hydrogeology and ground conditions was provided by the Planning Inspectorate, Natural England, Historic England, United Utilities, Blackpool Council, Fylde Council, South Ribble Borough Council, Preston City Council, Environment Agency, Lancashire County Council, Canal and River Trust and section 47 organisations and members of the public.
- 4.7.20.2 The key issues raised relevant to geology, hydrogeology and ground conditions which have been identified during the statutory consultation include:
- consideration to be given to impacts on groundwater levels and flow, including impacts on Lytham St Annes Dunes SSSI;
 - further information to be provided on the potential presence of UXO;
 - potential impact from the heat output from cable operations on land and groundwater;
 - pollution prevention measures;
 - consideration of potential impacts upon Source Protection Zones (SPZ);
 - potential impacts from bentonite slurry leakage and mitigation;
 - investigation of potential pathways which could be introduced between contaminated groundwaters and surface waters of the River Ribble given the historical landfilling at this location; and
- 4.7.20.3 All section 42 feedback received against this topic, alongside the Applicants' response can be seen in Annex E1.16.16. Section 47 response themes against this topic, alongside the Applicants' response, can be seen at Annex E1.16.1.

Summary of feedback and Applicants response

Consideration to be given to impacts on groundwater levels and flow, including impacts on Lytham St Annes Dunes Site of Special Scientific Interest

- 4.7.20.4 A number of comments were raised relating to potential impacts upon groundwaters and groundwater dependent receptors. A key groundwater dependent ecological receptor which was specifically highlighted as being highly sensitive to groundwater changes was Lytham St Annes Dunes SSSI.
- 4.7.20.5 The Applicants have ensured that changes in groundwater quality and quantity are assessed within Volume 3, Chapter 1 of the ES (document reference F3.1) in terms of aquifer status, groundwater importance as an abstraction source as well as the impact upon specific groundwater dependent ecological receptors.
- 4.7.20.6 Due to linkages between surface water and groundwater, reference to groundwater is also made within Volume 3, Chapter 2 Hydrology and flood

risk of the ES (document reference F3.2) ‘the impact of contaminated runoff on the quality of surface water and ground receptors’ in which pollution prevention measures have been proposed as part of the Outline Pollution Prevention plan (document reference J1.4).

Further information to be provided on the potential presence of Unexploded Ordnance

- 4.7.20.7 Comments were received in relation to the lack of desk study information including risk assessment regarding the potential presence of UXO. A detailed UXO desk top study has been completed for the Project with mitigation measures proposed for the assigned risk levels.

Potential impact from the heat output from cable operations on land and groundwater

- 4.7.20.8 Comments were raised regarding the potential heating of ground/ groundwater impacting upon land and groundwater during cable power transmission. The potential for heat generation is discussed within Volume 3, Chapter 1 of the ES (document reference F3.1) and assessed as likely mitigated through the use of insulation properties and suitable spacing of the cables. Further heat assessment is to be undertaken on final engineering design.

Pollution prevention measures

- 4.7.20.9 Comments were provided on pollution prevention measures including the storage requirements for fuels and chemicals and emergency contact procedures; it was requested that more detail be included the Code of Construction Practice (CoCP), following feedback, the outline CoCP (document reference J1) has been updated for the application and specific details on construction control measures have been added.

Consideration of potential impacts upon Source Protection Zones (SPZ)

- 4.7.20.10 It was requested that all potential impacts on groundwater SPZs should be assessed. Following feedback, the impact upon the bedrock aquifer due to contaminant mobilisation and reduced groundwater levels is assessed within Volume 3, Chapter 1 of the ES (document reference F3.1) with the application of specific mitigation measures. These include further ground investigation and assessment and control measures included within the outline CoCP (document reference J26).

Potential impacts from bentonite slurry leakage and mitigation

- 4.7.20.11 Potential contamination of the ground and groundwater from effluent arising from drilling operations was raised by a number of consultees. Contractor method statements, and an outline bentonite breakout plan which provides control measures to be implemented during construction, forms part of the outline CoCP (document reference J26). Contractor method statements and a full bentonite breakout plan will form part of the CoCP as part of the development consent.

Investigation of potential pathways which could be introduced between contaminated groundwaters and surface waters of the River Ribble given the historical landfilling at this location

4.7.20.12 A request to assess the introduction of potentially new pollutants pathways during construction associated with historical landfilling was raised. The impact is assessed and minimised principally through avoidance of direct source disturbance along with additional control measures included within the outline CoCP (document reference J26).

4.7.21 Hydrology and flood risk (PEIR Volume 3, Chapter 2)

4.7.21.1 Feedback on matters relating to hydrology and flood risk was provided by the Environment Agency, Natural England, Lancashire County Council, United Utilities, the Canal and Rivers Trust and section 47 organisations and members of the public.

4.7.21.2 The key issues raised relevant to the hydrology and flood risk which have been identified during the statutory consultation include:

- watercourse crossing methodologies;
- landfall crossing methodology;
- flood risk;
- measures to prevent deterioration to water quality; and
- protection of assets.

4.7.21.3 All section 42 feedback received against this topic, alongside the Applicants' response can be seen in Annex E1.16.17. Section 47 response themes against this topic, alongside the Applicants' response, can be seen at Annex E1.16.1.

Summary of feedback and Applicants response

Watercourse crossing methodologies

4.7.21.4 Comments were raised about the techniques that would be used to cross watercourses and how this infrastructure would be decommissioned. In addition, the Environment Agency noted concerns regarding the potential for scour and incision to occur within river and stream beds in which cables are buried underneath during the operational and maintenance phase.

4.7.21.5 The watercourses traversed by the Transmission Assets onshore infrastructure area comprise Main Rivers (managed by the Environment Agency) and ordinary watercourses (managed by the Lancashire County Council, the Lead Local Flood Authority). The Canal and Rivers Trust lease Savick Brook (a designated Main River) to enable navigation and connectivity to the Lancaster Canal.

4.7.21.6 Since the PEIR, a crossing schedule has been prepared for the ES (Volume 1, Annex 3.2: Onshore Crossing Schedule (document reference F1.3.2)). This sets out the methods that will be used to cross every obstacle along the onshore export cable corridor and 400 kv grid connection corridor including

Main Rivers and ordinary watercourses. The Onshore Crossing Schedule shows that watercourses will primarily be crossed using trenchless techniques. Watercourses are also to be crossed by the haul road and the Morgan onshore substation permanent access track. The design of these crossings will be in line with the Construction Method Statement as part of the detailed CoCP secured through the DCO.

Flood risk

- 4.7.21.7 Feedback was provided by the Environment Agency on how the impacts of climate change were assessed within the Flood Risk Assessment submitted at PEIR. In line with the feedback, updates have been made to the method for assessing the impacts of climate change with further clarity provided, and additional discussion and agreement was undertaken at a subsequent EWG to ensure a sufficient level of assessment has been provided as part of the Flood Risk Assessment.
- 4.7.21.8 A number of local residents within villages in close proximity to the onshore substations raised concerns regarding an increased flood risk arising from additional impermeable areas associated with the structures. The Outline Operational Drainage Management Plan (document reference J10) provides details regarding how surface water runoff will be attenuated and discharged from site at a restricted runoff rate to prevent an increase in flood risk to land downstream arising from increased impermeable areas.
- 4.7.21.9 Responses were received from the National Farmers Union, United Utilities and several members of the public who were concerned that the construction of the Transmission Assets would damage field drainage networks and United Utilities infrastructure and lead to increased risk of flooding and damage farmland. An Outline Code of Construction Practice (CoCP) has been prepared and submitted with the application for development consent and includes details regarding flood protection and control measures, and measures relating to the water environment and drainage. In order to manage impacts to field drainage, the Outline CoCP stipulates field drainage plans will be developed in consultation with the relevant landowners. If required, additional field drainage will be installed to ensure the existing drainage of the land is maintained during and after construction.

Protection of assets

- 4.7.21.10 United Utilities flagged that the Transmission Assets onshore infrastructure area is crossed by many of its water infrastructure assets. The Canal and Rivers Trust also noted the 400 kv grid connection cables would have to cross under Savick Brook which the Trust leases to enable navigation and connectivity to the Lancaster Canal.
- 4.7.21.11 The location of existing infrastructure and assets has been taken into consideration in the site selection and refinement of the design (see Volume 1, Figures: Chapter 4 Site Selection and consideration of alternatives, document reference F1.4). Construction works will be undertaken in accordance with United Utilities asset protection requirements via a protected provision and Canal & River Trust 'Code of Practice for Works affecting the

Canal & River Trust' (CoT87), both of which are to be secured as a protected provision within the draft DCO.

Measures to prevent deterioration to water quality

4.7.21.12 The Environment Agency and Canal and Rivers Trust flagged that pollution prevention measures were not provided at PEIR stage. Following feedback, measures to prevent deterioration to water quality have since been included within the Outline Pollution Prevention Plan as part of the Outline CoCP. The Outline Pollution Prevention Plan is included in the DCO application (document reference J1.4). The detailed Plan will be developed as part of the detailed CoCP and secured through the DCO.

4.7.22 Onshore ecology and nature conservation (PEIR Volume 3, Chapter 3)

4.7.22.1 Feedback on matters relating to onshore ecology and nature conservation was provided by Natural England, Lancashire County Council and section 47 organisations and members of the public.

4.7.22.2 The key issues raised relevant to land use and recreation which have been identified during the statutory consultation include the below.

- The potential impact of the Transmission Assets on statutory and non-statutory designated sites
- The potential impact of the Transmission Assets on protected species and protected habitats.
- The extent and timings of field surveys for habitats and species.
- The potential impact of the Transmission Assets on ornithological features, including notified features of statutory designated sites.

4.7.22.3 All section 42 feedback received against this topic, alongside the Applicants' response can be seen in Annex E1.16.18. Section 47 response themes against this topic, alongside the Applicants' response, can be seen at Annex E1.6.1.

Summary of feedback and Applicants response

The potential impact of the Transmission Assets on statutory and non-statutory designated sites

4.7.22.4 Stakeholders raised concerns regarding the potential impact of the Transmission Assets on statutory designated sites, including Ribble and Alt Estuaries SPA and Ramsar site, Ribble Estuary Site of SSSI, Newton Marsh SSSI, Lytham St Annes Dunes SSSI and National Nature Reserve (NNR). Stakeholders also requested that the potential impacts of trenchless techniques on Lytham St Annes Dunes SSSI and NNR should be considered as part of the assessment. Stakeholders also raised concerns regarding the potential impact of the Transmission Assets on non-statutory designated sites, including Lytham St Annes Local Nature Reserve and several Biological Heritage Sites.

- 4.7.22.5 The potential impacts of the Transmission Assets on statutory and non designated sites is considered in Volume 3, Chapter 3: Onshore ecology and nature conservation of the ES..
- 4.7.22.6 Following consultation reductions to the Order Limits have been made to the north of the PEIR boundary at landfall, including removal of the Order Limits from part of the dunes, south of Squires Gate Lane, between the beach and Clifton Drive North.
- 4.7.22.7 The Applicants have also committed to utilise trenchless techniques, where required, to avoid potential impacts on both statutory and non designated sites during construction of the Transmission Assets.
- 4.7.22.8 Further measures adopted as part of the Transmission Assets to mitigate potential impacts on onshore ecology and nature conservation includes the includes the preparation of a Code of Construction Practice in general accordance with the Outline Code of Construction Practice (document reference: J1), which has been submitted with the DCO application. The Code of Construction Practice will contain measures to mitigate potential impacts of dust, noise, and light disturbance on sensitive ecological receptors, including statutory designated sites during construction of the Transmission Assets. In addition, the Code of Construction Practice will create 50 m buffer zones around sensitive ecological areas to reduce the impact of air pollution arising from construction activities.

The potential impact of the Transmission Assets on protected species and protected habitats.

- 4.7.22.9 Stakeholders raised concerns regarding the potential impact of the Transmission Assets on protected species and protected habitats, including Species of Principal Importance and other notable species, such as red list species and nationally or local rare or scarce species and Habitats of Principal Importance and other irreplaceable habitats.
- 4.7.22.10 The potential impacts of the Transmission Assets on protected species and protected habitats are considered in Volume 3, Chapter 3: Onshore ecology and nature conservation of the ES.
- 4.7.22.11 As set out above the Applicants have made the commitment to utilise trenchless techniques, where required, to avoid potential impacts on protected habitats.
- 4.7.22.12 The Ecological Management Plan will build upon the Outline Ecological Management Plan (document reference J6) and will contain measures to mitigate impacts on protected species during construction of the Transmission Assets. Where impacts on habitats supporting protected species cannot be avoided, the Ecological Management Plan will set out requirements for the creation and future monitoring of appropriate mitigation areas within the Onshore Order Limits.

The extent and timings of field surveys for habitats and species

- 4.7.22.13 Concerns were raised regarding the extent and timings of field surveys undertaken to inform the baseline assessment and mitigation requirements

for the Transmission Assets. In addition, the stakeholders specifically requested that National Vegetation Classification (NVC) and sand lizard surveys should be undertaken at the sand dunes located at Lytham St Annes Dunes SSSI.

4.7.22.14 The Applicants can confirm that all field surveys required to inform the assessment have now been completed and are reported in Volume 3, Annex 3.3 – 3.14 of the ES (document reference: F3.3.2 – F3.3.14). This includes NVC surveys at Lytham St Annes Dunes SSSI. However, sand lizard surveys at Lytham St Annes Dunes SSSI were not undertaken on the basis that potential impacts on this species would be avoided via the commitment to utilise trenchless techniques (e.g. direct pipe) at this location.

4.7.22.15 All field surveys were undertaken in accordance with relevant guidance and during the optimal survey period (where possible). The scope, timings and methodologies used were discussed and agreed via regular EWGs with relevant stakeholders, prior to submission of the DCO application.

4.7.23 Onshore and intertidal ornithology (PEIR Volume 3, Chapter 4)

4.7.23.1 Feedback on matters relating to onshore and intertidal ornithology was provided by Natural England, Freckleton Parish Council, Lancashire Country Council, BAE Systems, Northwest Wildlife Trust, the Environment Agency National Infrastructure Team.

4.7.23.2 The key issues raised relevant to onshore and intertidal ornithology which have been identified during the statutory consultation include:

- the potential impact of the Transmission Assets on statutory sites designated for nature conservation with overlap or connectivity with the Onshore Order Limits and/or Intertidal Infrastructure Area;
- the potential impact of the Transmission Assets on Functionally Linked Land (FLL) of the Ribble and Alt Estuaries SPA;
- the potential impact of visual and noise disturbance from Transmission Assets on qualifying bird species; and
- the extent and timing of field surveys for ornithological features.

4.7.23.3 All section 42 feedback received against this topic, alongside the Applicants' response can be seen in Annex E1.16.19. Section 47 response themes against this topic, alongside the Applicants' response, can be seen at Annex E1.16.1.

Summary of feedback and Applicants' response

The potential impact of the Transmission Assets on statutory sites designated for nature conservation with overlap or connectivity with the Onshore Order Limits and/or Intertidal Infrastructure Area

4.7.23.4 Stakeholders raised concerns regarding the potential for impact of the Transmission Assets on statutory sites including Ribble and Alt Estuaries SPA and Ramsar site, Liverpool Bay SPA, Morecambe Bay and Duddon

Estuaries SPA, Ribble Estuary Site of SSSI, Newton Marsh SSSI, Lytham St Annes Dunes SSSI. Stakeholders also requested that the potential impacts of trenchless techniques on Lytham St Annes Dunes SSSI be considered as part of the assessment.

- 4.7.23.5 The potential impact of Transmission Assets on features of these sites is considered within section 4.11 of Volume 3, Chapter 4: Onshore and intertidal ornithology of the ES. This includes an assessment of the potential for impacts to arise from the use of trenchless techniques. The potential impact of Transmission Assets on internationally designated sites are also considered within the Habitats Regulations Assessment (HRA) Information to Support the Appropriate Assessment (ISAA) report.
- 4.7.23.6 Reductions to the Order Limits have been made to the north of the PEIR boundary at landfall, including removal of the Order Limits from part of the dunes, south of Squires Gate Lane, between the beach and Clifton Drive North.
- 4.7.23.7 The Applicants have also committed to use trenchless techniques, for example HDD, direct pipe or micro tunnel, where required, to avoid potential impacts on statutory designated sites during the construction phase.
- 4.7.23.8 Further measures adopted to mitigate potential impacts on onshore and intertidal ornithology include the preparation of an Outline Code of Construction Practice (OCoCP) (document reference J1), an Outline Ecological Management Plan (OEMP) (document reference J6) and an Outline Offshore Cable Specification and Installation Plan (PCSIP) (document reference J15). The OCoCP contains details of an Outline Biosecurity Protocol. The OEMP contains details of mitigation measures relating to habitats and protected or notable species, species mitigation licences and the role of the Ecological Clerk of Works (ECoW) where relevant. The OEMP also includes a Breeding Bird Protection Plan which will set out mitigation measures such as vegetation clearance in winter, pre-construction breeding bird survey, appropriate protection zones upon confirmation of nest building/breeding taking place of key protected or sensitive species.
- 4.7.23.9 In addition to the Breeding Bird Protection Plan, the OEMP sets out species-specific mitigation plans for Important Ecological Features identified as part of the assessment. The Outline Offshore Cable Specification and Installation Plan will restrict the Applicants to completing one cable pull in (a maximum of five weeks) per wintering season (i.e. during the months of November to February, inclusive), unless otherwise agreed with the MMO, in consultation with Natural England.

The potential impact of the Transmission Assets on Functionally Linked Land (FLL) of the Ribble and Alt Estuaries SPA

- 4.7.23.10 In response to publication of the PEIR, stakeholders raised concerns regarding the potential impact on the Functionally Linked Land (FLL) associated with the Ribble and Alt Estuaries SPA.
- 4.7.23.11 The Applicants can confirm that where construction activities are undertaken along the onshore export cable corridor within areas of Functionally Linked

Land (Lytham Moss Biological Heritage Site), 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). Where construction activities are undertaken within the Intertidal Infrastructure Area, mitigation measures will be provided at Fairhaven saltmarsh to reduce disturbance upon roosting wader features of Ribble and Alt Estuary SPA. This may comprise a combination of the employment of a warden, educational signage, and soft fencing. This is detailed within the Outline Ecological Management Plan (document reference J6).

The potential impact of visual and noise disturbance from Transmission Assets on qualifying bird species

- 4.7.23.12 Feedback raised concerns regarding the potential impact on qualifying bird species from visual and noise disturbance.
- 4.7.23.13 Since the publication of the PEIR the assessment of the potential impact of the Transmission Assets on key receptors from visual and noise disturbance has been updated.
- 4.7.23.14 The potential for impact from construction, decommissioning, and operation and maintenance activities on non-breeding waders at the coastal survey area and the onshore survey areas and non-breeding geese, ducks and swans at the onshore survey area has been mitigated against through the identification of two areas:
 - the high tide roost at Fairhaven saltmarsh; and
 - arable land at Lytham Moss.
- 4.7.23.15 As temporarily disturbed intertidal habitat cannot be recreated during the duration of the works, the Applicants have committed to trying to decrease disturbance in this area to reduce the daily energy requirements of the SPA features that have been identified as being potential receptors to the low impact of disturbance and displacement caused by construction works at the coastal survey area. The proposed measures include either the employment of a warden who will aim to educate and dissuade members of the public from walking along the tideline at high tide or the addition of educational signage to instil the importance of the high tide roost for these sensitive species, and soft fencing to dissuade walkers from accessing the tideline at high tide.
- 4.7.23.16 A patch of arable farmland contained within Lytham Moss and adjacent to the Farmland Conservation Area has been identified as the location for supplementary feeding of pink-footed goose and whooper swan. This measure has already been employed with success by the Farmland Conservation Area and aims to move sensitive receptors away from areas where they are reliant upon seasonal food resources towards an area where they will not be disturbed during the duration of the works. The extent and timing of field surveys for ornithological features
- 4.7.23.17 Feedback raised concerns regarding the extent and timings of field surveys undertaken to inform the baseline assessment and mitigation requirements for the Transmission Assets.

- 4.7.23.18 Since the publication of the PEIR, additional surveys have been completed.
- 4.7.23.19 During the breeding bird surveys a total survey coverage of the Onshore Order Limits (excluding urban areas and the airport) of 75.23 % was achieved. A total coverage of the Onshore Order Limits (excluding urban areas and the airport) of 94.89 % was achieved during the 2023/24 winter surveys. This survey coverage is considered robust enough to fully characterise the baseline used in the assessment presented within Volume 3, Chapter 4: Onshore and intertidal ornithology of the ES.
- 4.7.23.20 During statutory consultation Natural England cited the need for a recommended seven survey visits (November 2023). Two years of breeding bird surveys have now been completed, totalling nine visits.
- 4.7.23.21 A full description of the methodologies followed across all surveys is presented within Volume 3, Annex 4.4: Onshore and intertidal ornithology survey methodologies of the ES.

4.7.24 Historic environment (PEIR Volume 3, Chapter 5)

- 4.7.24.1 Feedback on matters relating to the historic environment was provided by Historic England, Lancashire County Council and South Ribble Borough Council, also by Freckleton Parish Council, Blackpool and The Fylde College, PWILs and section 47 organisations and members of the public.
- 4.7.24.2 The key issues raised relevant to the historic environment which have been identified during the statutory consultation include the following;
- the extent of the geophysical survey;
 - the need for a detailed walkover survey;
 - the impact of the proposed onshore substations with regard to the setting of Grade II listed buildings at Newton-with-Scales;
 - the impact of the proposed infrastructure at the National Grid Penwortham substation with regard to the setting of the Grade II listed Hesketh Farmhouse;
 - the potential for the recorded Quaker burial ground at Quakers Wood to be much more extensive, based on evidence recorded on the Freckleton Tithe map of 1838; and
 - the potential for the proposed development to impact upon sites and features of Roman date.
- 4.7.24.3** All section 42 feedback received against this topic, alongside the Applicants' response can be seen in Annex E1.16.20. Section 47 response themes against this topic, alongside the Applicants' response, can be seen at Annex E1.16.1.

Summary of feedback and Applicants response

The extent of the geophysical survey

- 4.7.24.4 Concern was expressed that land identified as having potential for geoarchaeological deposit modelling would not also be subjected to surface geophysical survey.
- 4.7.24.5 Surface geophysical survey (magnetometer survey) has been undertaken across almost all land within the onshore export cable corridor, the 400 kV grid connection corridor and the onshore substation sites where the land use is suitable for this technique. The extent of the magnetometer survey is indicated in Volume 3, Annex 5.2: Onshore archaeological geophysical survey report of the ES (document reference F3.5.2).

The need for a detailed walkover survey

- 4.7.24.6 At the time of the PEIR, the scheme design was such that it was not reasonable to undertake a detailed walkover survey of all land within the various search areas and route options. The walkover survey is necessary in order to check for the presence of previously unrecorded archaeological sites and features.
- 4.7.24.7 Following the refinement of scheme design, most land within the onshore export cable corridor, the 400 kV grid connection corridor and the onshore substation sites have been subject to geophysical survey, therefore the potential for previously unrecorded archaeological sites and features to be present within the Transmission Assets Order Limits: Onshore has been addressed.

The impact of the proposed onshore substations with regard to the setting of Grade II listed buildings at Newton-with-Scales

- 4.7.24.8 The issue of impact on the character of the village of Newton-with-Scales was raised, with specific reference to four Grade II listed buildings on Grange Land, in the southern part of the settlement.
- 4.7.24.9 The assessment of residual effects arising from changes within the settings of listed buildings is set out within Volume 3, Annex 5.5: Settings assessment of the ES (document F3.5.5). No significant effects were identified with regard to any of the Grade II listed buildings at Newton-with-Scales.

The impact of the proposed infrastructure at the National Grid Penwortham substation with regard to the setting of the Grade II listed Hesketh Farm

- 4.7.24.10 The issue of visual impacts arising from the proposed infrastructure at the National Grid Penwortham substation was raised, with specific reference to the setting of the Grade II listed Hesketh Farmhouse.
- 4.7.24.11 The assessment of residual effects arising from changes within the settings of listed buildings is set out within Volume 3, Annex 5.5: Settings assessment of the ES (document F3.5.5). No significant effects were identified with regard to the Grade II listed Hesketh Farmhouse.

The potential for the recorded Quaker burial ground at Quakers Wood to be much more extensive, based on evidence recorded on the Freckleton Tithe map of 1838

- 4.7.24.12 A small woodland known as Quakers Wood is recorded as the location of a Quaker burial ground with one headstone currently present. However, the Apportionment attached to the Freckleton Tithe map of 1838 indicates that land adjacent to this burial ground may also have been used for burials by the Quaker community.
- 4.7.24.13 Following feedback, the historic area around Quakers Wood has been subject to further review. The nature of the proposed works in this area are set out in Volume 1, Chapter 3: Project description of the ES (document F1.3). No physical impacts would occur within any land identified as a potential burial ground.

The potential for the proposed development to impact upon sites and features of Roman date

- 4.7.24.14 Concern was expressed that the proposals may encounter remains of Roman date, including roads leading from the Roman fort at Kirkham towards the estuary of the River Ribble.
- 4.7.24.15 The potential for archaeological remains of all periods to be present within the Transmission Assets Order Limits: Onshore is set out in Volume 3, Annex 5.1: Historic environment desk-based assessment of the ES (document F3.5.1). A phased programme of archaeological evaluation is being undertaken in accordance with best practice and with methodologies approved in advance by relevant stakeholders including the Historic Environment Team at Lancashire County Council. Further archaeological fieldwork will be undertaken ahead of and during construction to reduce or offset any impacts on buried archaeological remains.

4.7.25 Land use and recreation (PEIR Volume 3, Chapter 6)

- 4.7.25.1 Feedback on matters relating to land use and recreation was provided by Natural England, Environment Agency, Fylde Council, Lancashire County Council, South Ribble Borough Council, St Annes Council, Newton with Clifton Parish Council, Kirkham Town Council, Blackpool Council, PWILs and section 47 organisations and members of the public.
- 4.7.25.2 The key issues raised relevant to land use and recreation which have been identified during the statutory consultation include:
- the potential impact on soils, including areas of peat;
 - the potential impact on agricultural land, including Best and Most Versatile (BMV) soils;
 - the potential impact on the viability and operations of existing farming businesses;
 - the potential impact on Public Rights of Way (PRoW), including public footpaths and bridleways, during construction; and

- the potential impact on Recreational Resources, including livery yards and stables.

4.7.25.3 All section 42 feedback received against this topic, alongside the Applicants' response can be seen in Annex E1.16.21. Section 47 response themes against this topic, alongside the Applicants' response, can be seen at Annex E1.16.1.

Summary of feedback and Applicants response

The potential impact of the Transmission Assets on soils, including areas of peat

- 4.7.25.4 Feedback raised concerns regarding the potential impact of the Transmission Assets, particularly the Onshore Substation, on soils, including areas of peat located within the Transmission Assets Red Line Boundary. Stakeholders also requested further information regarding how potential impacts on soils would be mitigated during construction of the Transmission Assets, including requirements for soil surveys and preparation of a suitable Code of Construction Practice and Soil Management Plan.
- 4.7.25.5 The potential impact of the Transmission Assets on soils, including areas of peat has been considered in Volume 3, Chapter 6: Land use and recreation of the ES (document reference: F3.6).
- 4.7.25.6 The Applicants has prepared an Outline Soil Management Plan (document reference: J1.7), which forms part of the Outline Code of Construction Practice (document reference: J1) submitted with the DCO Application. The measures to be implemented seek to minimise impacts on soil health and protect and maintain soil quality during construction of the Transmission Assets.

The potential impact of the Transmission Assets on agricultural land, including BMV soils

- 4.7.25.7 Feedback raised concerns regarding the potential impact of the Transmission Assets, particularly the onshore substations, on agricultural land, including areas of BMV soils. Stakeholders also requested further information regarding how potential impacts on agricultural land, including areas BMV soils, would be mitigated during construction of the Transmission Assets, including requirements for soil surveys and preparation of a suitable Code of Construction Practice and Soil Management Plan.
- 4.7.25.8 Following feedback, the potential impact of the Transmission Assets on agricultural land, including BMV soils, including areas of peat has been considered in Volume 3, Chapter 6: Land use and recreation of the ES (document reference: F3.6). As set out above the Applicants have committed to mitigation measures which seek to minimise impacts on soil health and protect and maintain soil quality during construction of the Transmission Assets.

The potential impact of the Transmission Assets on the viability and operations of existing farming businesses

- 4.7.25.9 Feedback raised concerns regarding the potential impact of the Transmission Assets, particularly the onshore substations, on the viability and operations of existing farming businesses with land located within the Transmission Assets Red Line Boundary. Stakeholders also requested further information regarding how potential impacts on farming business would be mitigated during construction of the Transmission Assets.
- 4.7.25.10 The potential impact of the Transmission Assets on the viability and operations of existing farming businesses has been considered in Volume 3, Chapter 6: Land use and recreation of the ES (document reference: F3.6).
- 4.7.25.11 Measures adopted to mitigate impacts on existing farming businesses include the preparation of a Code and Construction Practice in general accordance with the Outline Code of Construction Practice (document reference: J1), which has been submitted with the DCO Application. The measures to be implemented as part of the Code of Construction Practice seek to limit disruption to the operation of individual farm holdings. This includes appointment of an Agricultural Liaison Officer (ALO) to be appointed in time for commencement of pre-construction activities and to be the dedicated point of contact for ongoing engagement about practical matters with landowners, occupiers and their agents during the pre-construction and construction phases.

The potential impact of the Transmission Assets during construction on PRoW, including public footpaths and bridleways

- 4.7.25.12 Feedback raised concerns regarding the potential impact on PRoW, including public footpaths and bridleways within the Transmission Assets Red Line Boundary. Stakeholders also requested further information regarding how potential impacts on PRoW would be mitigated during construction of the transmission Assets, including requirements for the temporary or permanent stopping up of public footpaths and bridleways.
- 4.7.25.13 Following feedback, the potential impact has been considered in Volume 3, Chapter 6: Land use and recreation of the ES (document reference: F3.6).
- 4.7.25.14 The Applicants have committed to the preparation of an PRoW Management Plan in general accordance with the Outline PRoW Management Plan (document reference J1.5) submitted with the DCO Application. The measures seek to minimise impacts on public footpaths, bridleways and other promoted routes (e.g. National Cycle Routes (NCRs), Long Distance Footpaths) during construction of the Transmission Assets, via the implementation of temporary managed crossings and temporary diversions. Once operational, there is no requirement for the permanent stopping up or diversion of existing PRoW.

The potential impact on Recreational resources, including livery yards and stables.

- 4.7.25.15 Feedback raised concerns regarding the potential impact of the Transmission Assets on Recreational Resources, including livery yards and stables within or in proximity to the Transmission Assets Red Line Boundary. Stakeholders also requested further information regarding how potential impacts on Recreational Resources, including livery yards and stables would be mitigated during construction of the transmission Assets, including requirements for the temporary or permanent stopping up of public bridleways.
- 4.7.25.16 The potential impact of the Transmission Assets on Recreational Resources, including livery yards and stables has been considered in Volume 3, Chapter 6: Land use and recreation of the ES (document reference: F3.6).
- 4.7.25.17 Measures adopted as part of the Transmission Assets to mitigate potential impacts on livery yards and stables are provided in section 6.8 of Volume 3, Chapter 6: Land use and recreation of the ES (document reference: F3.6). The Outline PRoW Management Plan (document reference: J1.5) submitted with the DCO Application, seeks to minimise impacts on public bridleways during construction of the Transmission Assets, via the implementation of temporary managed crossings and temporary diversions. Once operational, there is no requirement for the permanent stopping up or diversion of existing PRoW.

4.7.26 Traffic and transport (PEIR Volume 3, Chapter 7)

- 4.7.26.1 Feedback on matters relating to traffic and transport was provided by Treales, Roseacre & Wharles Parish Council, United Utilities, Ministry of Justice, St Annes Council, Lancashire County Council, Newton with Clifton Parish Council, National Highways, Blackpool & The Fylde College and South Ribble Borough Council, as well as section 47 organisations and members of the public.
- 4.7.26.2 The key issues raised relevant to traffic and transport which have been identified during the statutory consultation include:
- the impact of construction traffic;
 - road closures caused by open-cut cable trenching; and
 - concern regarding the proximity of substation accesses to the HMP Kirkham access.
- 4.7.26.3 All section 42 feedback received against this topic, alongside the Applicants' response can be seen in Annex E1.16.22. Section 47 response themes against this topic, alongside the Applicants' response, can be seen at Annex E1.16.1.

Summary of feedback and Applicants response

The impact of construction traffic

- 4.7.26.4 Feedback raised concerns over the impact of construction traffic during the duration of the works and requested more information on key aspects such as traffic profiles, construction routes and traffic management. This detail is included within section 7.11 of Volume 3, Chapter 7: Traffic and transport of the ES (document reference F3.7) providing an analysis of the impacts on traffic and transport receptors (including driver delay, severance, non-motorised user delay, non-motorised user amenity and road safety) during construction of the Onshore Infrastructure Area and Intertidal area elements of the Transmission Assets.
- 4.7.26.5 Measures to control potential transport impacts set out in the Outline Construction Traffic Management Plan (OCTMP) (document reference J5). Construction Traffic Management Plans(s) will be developed in accordance with the OCTMP prior to construction.

Road closures caused by open-cut cable trenching

- 4.7.26.6 Feedback raised concerns over roads closures, specifically for the M55 Heyhouses Link Road and Kilnhouse Road. As set out above, the Applicants have committed there will be no open-cut trenching activities or road closures to any public A, B and Classified unnumbered roads, except for Leach Lane. It is expected that open cut trenching of Leach Lane could be undertaken without a road closure and an assessment of the effects of such works is set out in Section 7.11 of Volume 3, Chapter 7: Traffic and transport of the ES (document reference F3.7).

Concern regarding the proximity of substation accesses to the HMP Kirkham access.

- 4.7.26.7 The Ministry of Justice requested for the removal of construction access option S2 and to a lesser extent options S1 and S10 to prevent potential issues upon the traffic generated by HMP Kirkham. Following feedback, the Outline Highways Access Management Plan (document reference J8) to be secured as part of the Code of Construction Practice, sets out proposed accesses to the Onshore Infrastructure Area and Intertidal area of the Transmission Assets. This does not propose those construction access options formerly referred to as S1, S2 and S10.

4.7.27 Noise and vibration (PEIR Volume 3, Chapter 8)

- 4.7.27.1 With regard to noise and vibration, feedback was received from Freckleton Parish Council, Fylde Council, Kirkham Town Council, Lancashire County Council, the National Infrastructure Team – Environment Agency, Newton with Clifton Parish Council, the Noise and Vibration EWG, Treales, Roseacre & Wharles Parish Council, United Utilities and section 47 organisations and members of the public.

4.7.27.2 The key issues raised of relevance to noise and vibration which have been identified during the statutory consultation activities undertaken for the Morgan and Morecambe Offshore Wind Project include:

- mitigation of noise during construction ;
- baseline noise and vibration survey ; and
- operational noise and vibration levels from substations

4.7.27.3 All section 42 feedback received against this topic, alongside the Applicants' response can be seen in Annex E1.16.23. Section 47 response themes against this topic, alongside the Applicants' response, can be seen at Annex E1.16.1.

Summary of feedback and applicant response

Mitigation of noise during construction

4.7.27.4 Fylde Council, Lancashire County Council, Newton with Clifton Parish Council, Treales, Roseacre & Wharles Parish Council, and the EA National Infrastructure Team raised concerns regarding potential noise impacts to local residents during construction and the proposed working hours. The construction noise and vibration assessment (Volume 3, Chapter 8 : Noise and vibration of the ES (document reference F3.8) has taken into account noise mitigation measures; examples of the mitigation measures are set out in the Outline Construction Noise and Vibration Management Plan (document reference J1.3) and will be secured (as part of the CoCP) as a requirement of the DCO. The Construction Noise and Vibration Management Plan(s) will be agreed with the relevant planning authority prior to construction.

Baseline noise and vibration survey

4.7.27.5 Lancashire County Borough Council expressed that any baseline survey data should be current and up to date. It was also noted that no baseline sound surveys had been undertaken along the Onshore Cable Corridor. Baseline sound surveys have been undertaken in both 2023 and 2024. The number and locations of monitoring locations were discussed and agreed with the EWG. The results of these are reported in Volume 3, Annex 8.1: Baseline sound survey of the ES (document reference F3.8.1).

Operational noise and vibration levels from the Onshore Substation

4.7.27.6 Freckleton Parish Council, Fylde Council, Newton with Clifton Parish Council, and Treales, Roseacre & Wharles Parish Council expressed concern over operational noise levels (including low frequency noise) from substations, and Newton with Clifton Parish Council and United Utilities specifically referred to related vibration levels.

4.7.27.7 As a result of design changes, the onshore substations have been moved further from residential receptors as well as creating a greater distance from Hall Cross and Freckleton.

4.7.27.8 An assessment of operational noise impacts is presented in Volume 3, Annex 8.3: Operational noise of the ES (document reference F3.8.3) and considers impacts relative to the night-time background sound levels at the nearest and most exposed residential receptors, with particular consideration given to low frequency tonal components, and mitigation specified where required. Operational Noise Management Plan(s) will identify noise limits for the operation of the onshore substations and the measures for how these limits would be monitored.

4.7.27.9 The operational noise limits will be secured as a requirement in the draft DCO. This will result in significant adverse effects being avoided and adverse impacts minimised at all times.

4.7.28 Air quality (PEIR Volume 3, Chapter 9)

4.7.28.1 Feedback on matters relating to air quality was provided by The National Infrastructure Team in the Environment Agency and Lancashire County Council and section 47 organisations and members of the public.

4.7.28.2 The key issue raised relevant to the air quality which have been identified during the statutory consultation was:

- Potential effects of dust during construction

4.7.28.3 All section 42 feedback received against this topic, alongside the Applicants' response can be seen in Annex E1.16.23. Section 47 response themes against this topic, alongside the Applicants' response, can be seen at Annex E1.16.1.

Summary of feedback and Applicants response

Potential effects of dust during construction

4.7.28.4 The National Infrastructure Team Environment Agency highlighted that air quality and dust management should be included in a Code of Construction Practice (CoCP). A dust management plan has been prepared and will be included in the outline CoCP (document reference J1.2).

4.7.28.5 Lancashire County Council highlighted the need for impacts arising from dust to be stated and assessed. An assessment of dust generated during the construction phase has been undertaken in the ES and mitigation measures recommended to ensure the effects are not significant (Volume 3, Chapter 9 of the ES, document reference F3.9). The mitigation measures have been included in the Outline Dust Management Plan (document reference J25). Detailed Dust Management Plan(s) will be produced in accordance with the Outline plan.

4.7.29 Seascape, landscape and visual resources (PEIR Volume 4, Chapter 1)

4.7.29.1 Feedback on matters relating to landscape and visual resources was provided by stakeholders including Planning Inspectorate, Natural England, Cadw, Canal and River Trust, Environment Agency, Blackpool Council, Fylde

Council, Lancashire County Council, South Ribble Borough Council, Treales, Roseacre and Wharles Parish Council, St Annes on the Sea Town Council, Newton with Clifton Parish Council, Kirkham Town Council, Freckleton Parish Council Town Council and section 47 organisations and members of the public.

- 4.7.29.2 The key issues raised relevant to the landscape and visual resources which have been identified during the statutory consultation include the below.
- visualisations should be available to illustrate the extent, and the likely impact, upon visual amenity, and the scope for effective mitigation measures;
 - visual impact during the construction phase on boaters/towpath users (waterway crossing of Savick Brook) as sensitive receptors;
 - loss of visual amenity generally, but particularly from premises on residential properties, which are near to the proposed onshore substations;
 - impact on the distinct character of rural communities including Newton-with-Scales, Kirkham, Freckleton and the wider countryside environment;
 - assessment of cumulative impact on the local community, including the village of Newton-with-Scales; and.
 - mitigation of the large-scale industrial complex in the south Fylde countryside space.
- 4.7.29.3 All section 42 feedback received against this topic, alongside the Applicants' response can be seen in Annex E1.16.25. Section 47 response themes against this topic, alongside the Applicants' response, can be seen at Annex E1.16.1.

Summary of feedback and Applicants response

Visualisations should be available to illustrate the extent, and the likely impact, upon visual amenity, and the scope for effective mitigation measures.

- 4.7.29.4 A significant concern was visual impact and feedback questioned why no visualisations or 3D models were made available for consultation. Wireline visualisations were included within the PEIR, showing the maximum parameters from various viewpoints. Following the decision to take option 2 forward for the Morecambe onshore substation and refinement of the Morgan onshore substation visualisations are presented as part of the landscape and visual assessment within the ES at Volume 3, Figure 10.5 (Parts 1-5) (document reference F3.12, Part 3).
- 4.7.29.5 Photomontages have been produced for each of the representative viewpoints identified and are presented (see Volume 3, Figures).
- 4.7.29.6 Representative viewpoints have been selected in consultation with relevant statutory consultees and stakeholders prior to submission of the DCO application, including the EIA Scoping Stage.

Visual impact during the construction phase on boaters/towpath users (waterway crossing of Savick Brook) as sensitive receptors.

- 4.7.29.7 Feedback raised concerns over the potential visual impact for boaters and towpath users as the River Ribble and the Savick Brook are waterways which would be crossed by the cable corridor and would place water based visual receptors in close proximity to the temporary construction activities.
- 4.7.29.8 These waterways are contained by steep sided banks set below the level of the surrounding landscape within the vicinity of the cable corridor. Views would generally be contained within the water course.

Assessment of cumulative impact on the local community, including the village of Newton-with-Scales

- 4.7.29.9 Feedback raised concern over the cumulative effects of neighbouring facilities. The Newton Grange Bluefield solar farm west of Newton-with-Scales has the potential to be visible in combination with either the Morgan or Morecambe onshore substations in some of these views.
- 4.7.29.10 Based on the data gathered during the field surveys it has been concluded that potential sequential views where a number of developments can be viewed from a range of locations when travelling along a route within the study area, are extremely limited. The existing solar farm at Kirkham Road, 1.2 km to the west of the Morgan onshore substation site and Newton Grange Bluefield solar farm (22/0204) immediately to the east of the Morgan onshore substation site are low-lying developments and would be difficult to distinguish while traversing local roads, which are lined by high hedgerows.

Loss of visual amenity generally and the mitigation of the large-scale industrial complex in the south Fylde countryside space

- 4.7.29.11 Feedback raised concerns over the loss of visual amenity generally, but particularly from residential premises on nearby residential properties to the proposed onshore substations. Comments also requested that mitigation should demonstrate that the technology is used to minimise the size of the structures required, and/ or delivers the structures in a disaggregated form to minimise their visual impact in the landscape.
- 4.7.29.12 One of the key design changes since PEIR is the reduction in height of the onshore substations. The maximum building height of the Morecambe onshore substation has been reduced from 20m and PEIR to 13m at application and the maximum building height of the Morgan onshore substation has been reduced from 20m and PEIR to 15m at application.
- 4.7.29.13 Mitigation of potential visual impact is included within the Outline Landscape Management Plan (document reference J2) which sets out proposed screen planting around the onshore substations alongside maintenance, management and monitoring requirements proposals required during operation and maintenance of the Transmission Assets.

4.7.30 Aviation and radar (PEIR Volume 4, Chapter 2)

- 4.7.30.1 Feedback on matters relating to Aviation and Radar was provided by NATS, Blackpool Council, Fylde Council, Blackpool Airport, MCA, , Ministry of Defence, BAE Systems, Isle of Man Government, Noordzee Helikopters Vlaanderen (NHV), energy developers (offshore wind farms and oil and gas), MMO and section 47 organisations and members of the public.
- 4.7.30.2 The key issues raised relevant to Aviation and Radar which have been identified during the statutory consultation include:
- potential effects on NATS St Anne’s Primary Surveillance Radar (PSR);
 - potential effects on Blackpool Airport communication and navigation equipment and Airport flight operations;
 - potential effects on BAE Systems Warton Aerodrome aeronautical safeguarded zones;
 - potential effects on the access by helicopters to the offshore hydrocarbon platforms; and
 - potential effects of electromagnetic fields on aviation.
- 4.7.30.3 All section 42 feedback received against this topic, alongside the Applicants’ response can be seen in Annex E1.16.26. Section 47 response themes against this topic, alongside the Applicants’ response, can be seen at Annex E1.16.1.

Summary of feedback and Applicants’ response

Potential effects on NATS St Anne’s PSR

- 4.7.30.4 In the NATS (Safeguarding Office) feedback it was noted that the site is part of the national critical infrastructure and supports the provision of Air Traffic Services to various users in the UK. Other than raising awareness and advising due care in respect of the power connection to the site, NATS anticipates no impact from the proposal and has no comments on the DCO application.

Potential effects on Blackpool Airport communication and navigation equipment and Airport flight operations

- 4.7.30.5 In the Blackpool Council, Fylde Council and Blackpool Airport feedback it was noted the potential effect on Blackpool Airport’s communication and navigation equipment and noted that the Airport and all of its safety assurance processes must take priority in any decisions made in respect to a proposed route across the site. In this respect, this includes but is not limited to an understanding that the airport cannot be closed for any period of time to accommodate the Transmission Assets.
- 4.7.30.6 The Applicants are working closely with Blackpool Airport and the Enterprise Zone to address their concerns. Planning and works programmes on the Airport are being agreed by the Applicants and Blackpool Airport Operations Ltd (BAOL) to mitigate any effects to the Airport’s flight operations. These

plans are also considered within Aviation and Radar Volume 3, Chapter 11 of the ES (document reference F3.11).

Potential effects on BAE Systems Warton Aerodrome aeronautical safeguarded zones

- 4.7.30.7 Feedback noted that Warton Aerodrome is a UK strategic asset supporting the UK and international partners with national and international defence. The Aerodrome is licensed by both the Civil Aviation Authority and the Military Aviation Authority.
- 4.7.30.8 The Onshore Order Limits of the Transmission Assets lie beyond the Communication, Navigation and Surveillance and the runway safeguarded area of BAE Systems Warton Aerodrome; over 2.5 km from the runway strip. The Onshore Order Limits lie below the Warton Aerodrome Obstacle Limitation Surfaces Inner Horizontal Surface but construction equipment (in the Construction Phase) and remaining, low height, above surface infrastructure (in the Operation and Maintenance Phase) will not penetrate the surface ceiling.
- 4.7.30.9 Therefore, BAE Systems Warton (Aerodrome) has been scoped out of the environmental assessment as there is no potential for an effect.

Potential effects on the access by helicopters to the offshore hydrocarbon platforms

- 4.7.30.10 Feedback responses, including from existing and proposed offshore windfarm operators noted that it is difficult to quantify the level of impact of helicopter usage during the construction and operation of the Transmission Assets.
- 4.7.30.11 Volume 1 Chapter 3: Project Description of the ES Envelope (PDE) anticipates that during the offshore Morgan Transmission Assets construction phase (over approximately 18 months) there will be a maximum of one helicopter on site at any one time involving 40 return supply flights. The offshore Morecambe Transmission Assets construction phase will not employ helicopter support.
- 4.7.30.12 Following post PEIR design changes, the OSPs and Morgan offshore booster station have been removed from the application; helicopter operations have therefore been scoped out of the assessment as there is no potential for an effect.

Potential effects of electromagnetic fields on aviation

- 4.7.30.13 Stakeholders feedback cited concerns over the potential impacts of electromagnetic fields (EMF) on Blackpool Airport and BAE Systems Warton Aerodrome.
- 4.7.30.14 EMF interference effects arising from the operations and maintenance phases of the Transmission Assets have been assessed in section 11.11 of Volume 3 Chapter 11 of the ES (document reference F3.11). Due to the location of the Aerodrome and the Onshore Order Limits of the Transmission Assets the Aerodrome has been scoped out of the assessment, as there is no potential for an effect.

4.7.30.15 Detailed design works including sensitive export cable routing and micro-siting and appropriate construction techniques (cable depth and sheathing in particular) will continue regarding any potential effects, if any, to the Blackpool Airport CNS infrastructure. Construction works mitigation will be addressed and be in line with the CAAs regulatory expectation (CAP 791 process and procedures (CAA 2016)).

4.7.31 Climate change (PEIR Volume 4, Chapter 3)

4.7.31.1 Feedback on matters relating to climate change was provided by Natural England, Freckleton Parish Council, Lancashire County Council, Environment Agency and section 47 organisations and members of the public.

4.7.31.2 The key issues raised relevant to climate change which have been identified during the statutory consultation include:

- the assessment of peat and peaty soils and associated carbon storage;
- the assessment of climate risk, specifically regarding flood risk; and
- consideration of local opportunities for offsetting greenhouse gas emissions.

4.7.31.3 All section 42 feedback received against this topic, alongside the Applicants' response has been reported under the relevant topics and tables within Annex E1.16. Despite being a feedback form question (4.3) only one consultee response directly related to climate change simply requesting it to be considered. This has been reported within the overarching table at Annex E1.16.2.1. Section 47 response themes against this topic, alongside the Applicants response, can be seen at Annex E1.16.1.

Summary of feedback and Applicants response

Assessment of peat carbon storage

4.7.31.4 The assessment of greenhouse gas emissions within Volume 4, Chapter 1: Climate change of the ES considers the impact of greenhouse gas emissions arising from land use change, accounting for any disruption to peat or peaty soils.

4.7.31.5 The assessment has been informed by Chapter 6: Land use and recreation of the ES, which identified that there was potential for peat to the east and west of Huck Lane, however, surveys conducted in 2024 conclude that the potential peat land is categorised as organic carbon and not peat. Furthermore, Volume 3, Annex 5.4: Geoarchaeological desk based assessment report of the ES has stipulated that any buried peat would be below 2 m and as such, would not be disturbed by any construction activity. Section 1.11.3 of Volume 4, Chapter 1: Climate change of the ES details the assessment of greenhouse gas emissions arising from land use change, accounting for the above-mentioned surveys.

Climate change risk assessment and flood risk

4.7.31.6 The Climate Change Chapter (Volume 4, Chapter 1 of the ES) includes an assessment of risks to the Transmission Assets arising from climate change (detailed within Volume 4, Annex 1.2: Climate change risk assessment of the ES). The most significant risk from climate change to the Transmission Assets is likely to arise from flooding. This is assessed separately in detail in Volume 3, Chapter 2: Hydrology and flood risk of the ES and appropriate flood management and resilience measures have been taken into consideration, including an allowance for climate change effects. No further consideration and inclusion of flooding is presented within Volume 4, Chapter 1: Climate change of the ES, or Volume 4, Annex 1.2: Climate change risk assessment of the ES.

Offsetting greenhouse gas emissions

4.7.31.7 Offsetting has not been considered as part of Volume 4, Chapter 1: Climate change of the ES as this is a last resort when considering greenhouse gas reduction opportunities. A maximum design scenario has been considered, which presents a conservative assessment of greenhouse gas emissions. There would be opportunities to explore emissions offsets as the design process develops, and once suppliers become known following the DCO submission. Further information regarding emissions reduction measures can be found in the Greenhouse Gas Reduction Strategy (document reference J4).

4.7.32 Socio-economics (PEIR Volume 4, Chapter 4)

4.7.32.1 Feedback on matters relating to Socio-economics was provided by a number of stakeholders, including Fylde Council, Blackpool Airport, Newton with Clifton Parish Council, Freckleton Parish Council, Treales, Roseacre & Wharles Parish Council, Blackpool & The Fylde College, PWILS and section 47 organisations and members of the public.

4.7.32.2 The key issues raised relevant to Socio-economics which have been identified during the statutory consultation include:

- potential impacts on operations of Blackpool Airport and Blackpool Airport Enterprise Zone;
- potential impacts on the viability of operating farms;
- potential impacts raised include viability, employment, production, supply chain, wider use of the farms, and wellbeing;
- potential impacts on the local amenity, and subsequent (indirect) impacts on residents and visitors;
- how individuals, communities and enterprises will see a net benefit from the project;
- Requests for assurance of the pay, safety, quality, working conditions and training provision for workers involved in the Transmission Assets; and

- potential impacts of construction phase noise on local businesses, particularly in tourism related industries.

4.7.32.3 All section 42 feedback received against this topic, alongside the Applicants' response can be seen in Annex E.1.16.27. Section 47 response themes against this topic, alongside the Applicants' response, can be seen at Annex E.1.16.1.

Summary of feedback and Applicants response

Potential impacts on Blackpool Airport Enterprise Zone

4.7.32.4 Fylde Council, Blackpool Airport and Blackpool & The Fylde College commented on the potential socio-economic impacts of the Transmission Assets on the operations of Blackpool Airport and Blackpool Airport Enterprise Zone.

4.7.32.5 Potential economic impacts of the Transmission Assets on Blackpool Airport Enterprise Zone are considered within Volume 4, Chapter 2: Socio-Economics of the ES (document reference F4.2). Overall, it is estimated that a very small number of businesses located within the Enterprise Zone itself would experience a modest or substantial change.

Potential impacts on the viability of the operating farms. Potential impacts raised include viability, employment, production, supply chain, wider use of the farms, and wellbeing

4.7.32.6 Fylde Council, Newton with Clifton Parish Council, Freckleton Parish Council, as well as various other stakeholders including PWILs and individuals commented on the potential impacts on the viability of the operating farms.

4.7.32.7 On the basis of proportionality, an assessment of potential impacts on individual businesses has not been considered within Volume 4, Chapter 4 of the ES. The Applicants have considered impacts of the associated expenditure of Transmission Assets on the economies of the socio-economic study areas, measured through receptors of employment, Gross Value Added and increased employment opportunities for local residents.

4.7.32.8 Potential economic effects in North West England are assessed as beneficial. Given the beneficial nature of potential economic effects, further mitigation is not required.

Potential impacts on the local amenity, and subsequent (indirect) impacts on residents and visitors

4.7.32.9 Fylde Council and Freckleton Parish Council commented on the potential impacts on local amenity, and subsequent (indirect) impacts on residents and visitors. Potential indirect impacts on tourism associated with potential changes to visual amenity of local areas has been assessed within Volume 4 Chapter 2: Socio-economics of the ES (document reference F4.2). Potential tourism effects in North West England are assessed as negligible. Given this is not significant in EIA terms, further mitigation is not required. Other potential impacts on local amenity and indirect impacts on residents and

visitors have been assessed in Volume 1, Annex 5.1: Human health of the ES (document reference F1.5.1), Volume 3, Chapter 7: Traffic and Transport of the ES (document reference F3.7), Volume 3, Chapter 8: Noise and vibration of the ES (document reference F3.8) and Volume 3, Chapter 9: Air quality of the ES (document reference F3.9).

How individuals, communities and enterprises will see a net benefit from the project

- 4.7.32.10 Consultees requested information on how individuals, communities and enterprises will see a net benefit from the project.
- 4.7.32.11 The Applicants have committed to the provision of an Outline Employment and Skills Plan (document reference J31) which is included in the DCO application.
- 4.7.32.12 The actions presented within the Outline Plan will form the basis of two post-consent Employment and Skills Plans, which will be separately prepared and adopted by the Applicants to help develop and support the economic benefits associated with the Transmission Assets in relation to employment and skills within the offshore wind sector. This process will involve engagement and consultation with relevant employment and skills stakeholders (stakeholders are likely to include local councils, key educational providers, skills partnerships, and other developments in the pipeline).
- 4.7.32.13 The Transmission Assets is fully committed to delivering a community benefits scheme in line with UK Government guidance, which is due to be published later this year. Ahead of the guidance being published we have been engaging with local people, businesses and organisations to identify key themes and projects that will deliver strategic benefits and directly support the local community and local priorities.

Requests for assurance of the pay, safety, quality, working conditions and training provision for workers involved in the Transmission Assets.

- 4.7.32.14 Blackpool, Fylde & Wyre Trade Union Council requested assurances around the pay, safety, quality, working conditions and training for workers involve in the Transmission Assets.
- 4.7.32.15 As set out above, the Applicants have committed to the provision of an Outline Employment and Skills Plan which will form the basis of two post-consent Employment and Skills Plans, which will be separately prepared and adopted by the Applicants.

4.7.33 Inter-relationships (PEIR Volume 4, Chapter 5)

- 4.7.33.1 No responses were received during statutory consultation which related directly to this topic and chapter of the PEIR. As the inter-related effects chapter considers effects from multiple receptors groups rather than being a standalone topic, feedback on the inter-related effects has been reported under the relevant topics and tables within Annex E1.16.

4.7.34 Human health (PEIR Volume 1, Annex 5.1)

4.7.34.1 Whilst Human Health was scoped out of the EIA assessment as there is no potential for an effect, it is a perceived risk and thus a consideration for the Applicants and consultees. Comments were received during statutory consultation which related to Human Health.

4.7.34.2 The key issues raised relevant to human health which have been identified during the statutory consultation include:

- concerns regarding road closures and their potential to impact access to healthcare services;
- concerns regarding noise from substations and the potential effects on residents' health; and
- concerns regarding Electro-magnetic fields (EMF).

4.7.34.3 All section 42 feedback received against this topic, alongside the Applicants' response can be seen in Annex E1.16.28. Section 47 response themes against this topic, alongside the Applicants' response, can be seen at Annex E1.16.1.

Summary of feedback and Applicants response

Impact of road closures on access to healthcare

4.7.34.4 Concerns were raised about the impact of road closures during construction, which could restrict access and affect journey times for medical care.

4.7.34.5 The population health impacts associated with road closures and construction, including potential effects on journey times for medical care, have been assessed. The expectation is no or slight implications for healthcare services. Mitigation in terms of early and ongoing information sharing with emergency and healthcare services is secured within construction traffic management plans

Noise impacts from substations

4.7.34.6 Concerns were raised about the main impact of noise from substations and its potential detrimental effects on residents' health.

4.7.34.7 The health and wellbeing effects of noise and vibration changes associated with the Transmission Assets are assessed and presented in section 1.12.8 of Volume 1, Annex 5.1: Human Health of the ES. Any potential noise impacts from operation and maintenance of the onshore substations would be mitigated through best practice measures and the final design will incorporate noise control measures.

Concerns over EMF

4.7.34.8 Concerns were raised over EMF as a result of the Project and its potential impact on health. All the electrical infrastructure associated with the offshore and onshore elements of the Project would be designed to comply with current guidelines on levels of public exposure and design of electrical

infrastructure. On this basis, it was agreed with the Planning Inspectorate that effects associated with EMFs would not be significant and would be scoped out of the EIA process as there is no potential for an effect. The Project will adopt the International Commission on Non-ionizing Radiation Protection (ICNIRP) guidelines and Government voluntary Code of Practice on EMF public exposure. Such considerations are inherent to the detailed engineering considerations of cable specification and routing. Relevant public EMF exposure guideline limits are noted in NPS EN-5 and would be complied with by the Project. These guidelines are long standing and have a high safety margin. The levels of exposure that they require would not pose a risk to public health.

4.7.35 Draft Habitats Regulations Assessment

4.7.35.1 Feedback on matters relating to HRA and the draft HRA (comprising a Stage 1 LSE Screening Report and Stage 2 Information to Support Appropriate Assessment; ISAA) which was available during statutory consultation was provided by the Planning Inspectorate, the Marine Management Organisation, Natural Resource Wales (NRW), Natural England, Cefas, the Territorial Seas Committee, the Environment Agency, the Northwest Wildlife Trust, the Isle of Man Department of Infrastructure, the Inshore Fishing and Conservation Authority, the Department of Agriculture, Environment and Rural Affairs (DAERA) and other Local Planning Authorities.

4.7.35.2 The key issues raised relevant to the HRA which have been identified during the statutory consultation include:

- baseline characterisation;
- approach to LSE Screening;
- impacts to be scoped in and out of the HRA;
- conclusions of the in-combination assessment for diadromous fish species;
- conclusions of the HRA Stage 2 ISAA with respect to Annex II marine mammals; and
- approach to the assessment presented in the HRA Stage 2 ISAA for ornithology.

4.7.35.3 Some topic specific issues raised for benthic, fish and shellfish, marine mammal and ornithology receptors have also been considered in the HRA, but are not repeated in this section.

4.7.35.4 All section 42 feedback received against this topic, alongside the Applicants' response can be seen in Annex E1.16.29.

Summary of feedback and Applicants' response

Baseline characterisation

4.7.35.5 Natural England and NRW raised concerns that for several receptors (marine mammals, fish and shellfish and ornithology), the PEIR did not use the most

up-to-date information and was therefore based on incomplete information. Natural England also raised that in the HRA, SPA/Ramsar sites incorrectly identified features as breeding, non-breeding and assemblage features.

- 4.7.35.6 In response, the assessment was updated to use the most up-to-date information on the foraging distances of grey and harbour seals as presented in Carter *et al.* (2022), considered the migration routes for diadromous fish and checked features of SPA and Ramsar sites are listed correctly in the ES.
- 4.7.35.7 In response to incomplete information available for the diadromous fish species in the HRA Stage 2 ISAA, the baseline information has been updated to include relevant information on diadromous fish in north west England and North Wales. As suggested the baseline has also been updated with the document for migratory salmonids published by NRW.

Approach to LSE screening

- 4.7.35.8 Natural England, NRW, South Ribble Borough Council (SRBC) and DAERA raised concerns on the approach to LSE screening, including the sites which were screened in for marine mammals, sites considered for ornithology and the approach to the LSE screening for the Shell Flat and Lune Deep SAC, concerning sandwave clearance activities.
- 4.7.35.9 In response, the assessment was updated to use the OSPAR Region III and relevant Seal Management Units alongside the Carter *et al.* (2022) foraging distances to inform the initial screening of sites designated for Annex II marine mammal features. In response to DAERA highlighting that the North Channel SAC should be considered in the HRA Stage 1 Screening Report, this site has been considered and fully assessed for any potential LSE in the HRA Stage 1 Screening Report and HRA Stage 2 ISAA. Following the updates, Natural England have provided a formal response and confirmed that they agree with the suggested approach to the screening of sites for Annex II marine mammals which has been taken forward to the DCO Application.
- 4.7.35.10 In response to Natural England's concerns on the screening assessment for the Shell Flat and Lune Deep SAC due to the volume of sand wave clearance required and potential subsequent effects on this SAC, the Applicant_s screened the Shell Flat and Lune Deep SAC into the HRA Stage 2 ISAA on a precautionary basis. As such, the impacts associated with sandwave clearance on the Shell Flat and Lune Deep SAC and any necessary mitigation measures were assessed and considered as part of the HRA Stage 2 ISAA Part 2. The potential for impacts associated with sandwave clearance have been considered from the project alone and in combination under the 'increases in suspended sediment concentrations and associated deposition' in the HRA Stage 2 ISAA.
- 4.7.35.11 In response to SNCBs' comments on sites to consider in the HRA Stage 2 ISAA for ornithology, potential impacts on designated sites ((including the Ribble and Alt Estuaries SPA and Ramsar site) are included in the HRA Stage 2 ISAA. Following advice, consideration was also given to effects from the project on functionally linked land.

Impacts to be scoped in and out of the HRA

- 4.7.35.12 Various stakeholders provided advice on impacts to be screened in and out of the HRA at PEIR for all receptors considered in the HRA. This advice has been considered in the relevant chapters of the ES and the HRA Stage 1 Screening Report and the HRA Stage 2 ISAA have also been aligned with the respective chapter topics. These impacts have also been updated following post-PEIR refinement of the PDE, for example to remove the impact of injury and disturbance from piling due to this activity no longer being included as part of the project design. Natural England have confirmed they agreed with the impacts scoped into the assessment.

Conclusions of the in-combination assessment for diadromous fish species.

- 4.7.35.13 Following concerns raised by NRW on the robustness of the in-combination assessment and conclusions of the ES, the Applicant_s updated the assessment to give more explicit consideration to key migratory periods of fish within Volume 2, Chapter 3: Fish and shellfish ecology of the ES (document reference F2.3). As such the assessment is now based upon the precautionary assumption that Annex II diadromous fish features may be present within the area year-round, due to the uncertainties in their movements during their marine stage.

Conclusions of the HRA Stage 2 ISAA with respect to Annex II marine mammals

- 4.7.35.14 NRW raised concerns on the methodology used in the assessment of marine mammals presented in the HRA Stage 2 ISAA, with regard to densities for harbour porpoise, use of acoustic deterrent devices (ADDs), cumulative assessment of vessel noise, and technical aspects of behavioural noise thresholds. This includes concerns on the incorrect use of Effective Deterrence Ranges (EDRs) presented in the PEIR.
- 4.7.35.15 In response, Volume 2, Chapter 4: Marine mammals of the ES (document reference F2.4) has been updated in line with this feedback and these changes have been carried through to the HRA Stage 2 ISAA. This includes updated density assessments for marine mammals, and presentation of impact ranges for UXO both with and without ADD. The text on the EDR approach has also now been updated to remove reference to the number of animals disturbed and ensure the appropriate use of this approach (i.e. area-based thresholds to reflect the overall loss of habitat that would occur if all animals vacated an area within the EDR).

4.7.35.16 Approach to the assessment presented in the HRA Stage 2 ISAA for ornithology

- 4.7.35.17 Natural England advised that the assessment presented for the HRA Stage 2 ISAA should include average baseline mortality rates, accounting for the presence of multiple age classes in relevant populations for relevant species. As such the assessment has been updated to use average baseline mortality rates incorporating all age classes in the relevant assessments, noting that

the project now does not include any offshore surface infrastructure (e.g. OSPs) and as such effects are reduced from the PEIR.

- 4.7.35.18 Natural England raised concerns on the approach to the in-combination assessment, particularly in relation to impacts on red-throated diver and common scoter. In response, the assessment presented in the HRA Stage 2 ISAA was updated to give further consideration of temporal and spatial overlap between the Transmission Assets and other projects considered for the in-combination assessment of these features.
- 4.7.35.19 Concerns were also raised by Natural England on the use of out-of-date datasets. In response, data from HiDef Aerial Surveying Limited (2023) have now been used to inform relevant assessments.

4.7.36 Draft DCO (including deemed marine licence)

- 4.7.36.1 The Applicants prepared a draft DCO (document reference C1) for the statutory consultation. This included two draft deemed marine licences – one for each project.
- 4.7.36.2 Feedback was received from several stakeholders on the draft DCO and deemed marine licences including the MMO, the MCA, Natural England and the Environment Agency.
- 4.7.36.3 All feedback received against this topic, alongside the Applicants' response can be seen in Appendix E1.16.30.
- 4.7.36.4 Some of the feedback received related to drafting in the draft DCO and deemed marine licences provided for statutory consultation which referred to the offshore substation platforms (OSPs) and the Morgan Offshore Booster Station. Project refinements following statutory consultation have removed the OSPs and the Morgan Offshore Booster Station from the application and the associated drafting has therefore been removed from the draft DCO (document reference C1). Where relevant this has been noted in the Applicants' responses in Appendix E1.16.30.
- 4.7.36.5 The responses to the points raised by the MMO and the MCA in Appendix E1.16.32 note where updates have been made to the drafting of deemed marine licence conditions to address comments raised regarding notifications and the surveys and monitoring which will be undertaken before, during and after construction. The responses also address concerns raised by the MMO relating to the extent of the deemed marine licences to ensure they include the intertidal works and with regards to the application of the Marine and Coastal Access Act 2009 and the transfer of benefit provisions included at article 6 (benefit of the order) of the draft DCO.
- 4.7.36.6 The Applicants have had regard to all comments received during the statutory consultation on the draft DCO (document reference C1). Where the Applicants agrees with the drafting proposed by consultees they have included this within the application draft DCO (document reference C1). The Applicants expect there will be further discussion in relation to the draft DCO (document reference C1) including the deemed marine licences during the examination of the application, including issue specific hearing sessions

where consultees will have the opportunity to make representations on the application draft DCO and deemed marine licences.

4.7.37 Section 44 PWILs

- 4.7.37.1 In response to feedback from PWILs during the consultation period and through the engagement meetings, the order limits have been amended to reflect the feedback received. Some examples of the feedback obtained and how the applicant has responded to it are set out below:
- keep the order limits to the boundaries of fields to reduce severed land;
 - remove land from the order limits due to the impact on the farming enterprise;
 - concerns over the inclusions of residential curtilages within the boundary;
 - move the order limits away from residential properties and holiday cottages; and
 - concerns over the effect on equine holdings.
- 4.7.37.2 Where possible the Applicant has addressed the points raised and has removed some land from the order limits through route refinement and keeping to field boundaries. This micro siting has also increased the distance from residential properties, removed any curtilage and reduced the amount of severed land, as well as mitigating the impact on farming enterprises where possible.
- 4.7.37.3 PWIL (section 44) responses received during the statutory consultation are included within the tables at Annex E1.16.2 – E1.16.30. There is no separate section 44 response table as the feedback related to multiple topics. These can therefore be found within the topic related tables, as appropriate, and identified by the consultee type column.
- 4.7.37.4 Responses received as a result of targeted consultation (see **section 4.3.3, 4.3.4 and 4.3.5**) are presented at Annex E1.16.31.
- 4.7.37.5 The Applicants are in continued discussions with Section 44 consultees regarding their land interests in order to secure the land use powers it needs by agreement with the parties that own and occupy the land. The Applicant has initiated and is engaged in discussions with the affected parties, which remain ongoing, as detailed in **section 4.8.3** of this report.

4.8 Post-statutory consultation engagement

4.8.1 Summary of post-statutory consultation engagement

- 4.8.1.1 Following the statutory consultation period, which ended on 23 November 2023, in parallel with the targeted statutory consultations, the Applicants have continued to engage stakeholders.
- 4.8.1.2 Engagement took the form of:
- technical meetings and workshops;
 - one-to-one meetings and telephone calls with elected representatives;

- landowners and other interested parties who requested direct engagement; and
- reactive engagement through responding to queries received to the Project mailbox and telephone line

4.8.1.3 This post-statutory engagement formed an integral part of the Applicants' approach to making appropriate and necessary amendments to the Project design (including relevant mitigation measures) as the application was finalised.

4.8.2 Technical engagement

4.8.2.1 Following the close of statutory consultation, the Applicants continued to engage with the EPP Steering Group, EWGs, Engagement Forums and technical consultees. A series of meetings and workshops were held to discuss the statutory consultation responses and the results of ongoing assessment work.

4.8.2.2 This is discussed in more detail within the consultation section of the individual chapters of the ES (document reference F1 - F4), as well as in the TEP (document reference E5).

4.8.3 Landowner engagement

4.8.3.1 The Applicants committed to continued engagement with PWILs and through Dalcour Maclaren have continued to engage with landowners following the close of statutory consultation periods.

4.8.3.2 Landowner knowledge and feedback was critical in shaping the final onshore cable corridor prior to, during, and following the section 42 consultation period and round of targeted statutory consultations.

4.8.3.3 Following the close of the consultation, affected landowners were contacted by Dalcour Maclaren regarding intrusive and non-intrusive survey works which involved ground investigation works and archaeology trenching planned for spring 2024. Engagement also included discussing the proposed route amendments following consideration of comments made during statutory consultation. Dalcour Maclaren issued PWILs a letter on 8 March 2024 offering a site meeting to discuss the access requirements ahead of the submission of the application and how their land would be affected by the Applicants' proposals.

4.8.3.4 Template heads of terms for an option for easement to voluntarily negotiate the land rights required to deliver the Transmission Assets were issued to land agents acting on behalf of landowners and occupiers affected by the cable corridor up to the north of the Ribble on 8 February 2024. The populated heads of terms for the acquisition of land required for the substation were issued in April 2024 and the populated heads of terms for the cable corridor were issued in August 2024.

4.8.3.5 The heads of terms for the option agreement sets out the key principles to be agreed for the land rights the legally binding option agreement. Dalcour Maclaren will continue with the ongoing engagement with landowners and

PWILs through examination and construction and will seek voluntary agreement for all land rights required for its delivery.

- 4.8.3.6 Prior to submitting the Book of Reference, Dalcour Maclaren issued confirmation schedules to all PWILs in April 2024 to request confirmation of any details obtained through the LIQs and ad-hoc discussions were correct and updated where necessary.

4.8.4 Engagement with host authorities

- 4.8.4.1 In January 2024 the Applicants held an online meeting with councillors and council officers from South Ribble Council. The Applicant's presented information on the Project's latest proposals, as provided at statutory consultation, as set out at section **4.1.10**.
- 4.8.4.2 The Applicants have also held two meetings with Lancashire County Council's Skills and Employment Hub department. The purpose of the meetings was to present the key aspects and proposed initiatives to the Outline Employment and Skills Plan (document reference J31) and seek initial feedback to further develop the plan. The Applicants propose to engage with Lancashire County Council further on the Outline Employment and Skills Plan, as appropriate.
- 4.8.4.3 As technical consultees, the Applicants have engaged with representatives from the local authorities through the EWGs and other Engagement Forums. Further information is presented in section **4.8.2** of this report.

4.8.5 Engagement with the local community

- 4.8.5.1 The Applicants conducted both proactive and reactive engagement with the local community after the statutory consultation period officially ended on 23 November 2023. This involved the ongoing handling of enquiries received to the Project mailboxes and telephone line, and communicating information on the ground investigation and archaeology surveys in spring 2024. Letters were sent to nearby properties and information was also made available on the Project website.

4.8.6 Ongoing engagement activities

- 4.8.6.1 The Applicants remain committed to ongoing engagement beyond statutory consultation. It intends to continue engagement with stakeholders, including statutory consultees and landowners throughout the next stages of the Transmission Assets.
- 4.8.6.2 Following submission, the Applicants will seek Statements of Common Ground with key consultees to assist the Planning Inspectorate and the Secretary of State to aid understanding and clarification over which issues regarding the Transmission Assets are resolved and agreed, or otherwise.

5 Conclusions

5.1 Summary

- 5.1.1.1 In this report, the Applicants have set out how they have demonstrated their commitment to a robust consultation, dedicated to the principles of openness, transparency and collaboration.
- 5.1.1.2 Consulting with people living and working near to the Project, and who may be affected by the development, is an integral part of the Development Consent Order (DCO) planning process. This report explains that all consultation activity has been conducted accordingly, with an emphasis not merely on legal compliance but on comprehensive engagement. This spans the Project's earlier, pre-scoping phase in 2022, the two phases of non-statutory consultation in 2022 and 2023 and the statutory / targeted consultations in 2023 and 2024. It also covers the ongoing engagement activity that has continued beyond statutory consultation.
- 5.1.1.3 The report has set out how the Applicants have fulfilled their statutory obligations under sections 42, 47 and 48 of the Planning Act 2008 (the 2008 Act) regarding who should be consulted, how they should be consulted and how the consultation should be publicised. The report itself aligns with the recommended structure and content for a comprehensive consultation report and provides a detailed account of all pre-application stage consultation and stakeholder engagement activities related to the Transmission Assets, in accordance with the Planning Inspectorate's guidelines and the DCLG Guidance.
- 5.1.1.4 The Applicants have striven for the highest standards regarding compliance. To demonstrate that the Applicants have met the requirements of both legislation and guidance regarding pre-application consultation, a Consultation Compliance Checklist is provided within Annex E1.2 (document reference E1.2).
- 5.1.1.5 In particular, and in compliance with section 47(7) of the 2008 Act, consultation was carried out in accordance with the proposals set out in the Statement of Community Consultation (SoCC). As set out in the Planning Inspectorate's Advice Note Fourteen, the Consultation Report has provided evidence of how the Applicants have complied with the published SoCC.
- 5.1.1.6 Throughout all stages of consultation, the Applicants' main aim has been to allow interested parties the opportunity to provide their feedback on the proposals. The Applicants are grateful to all individuals and organisations who have taken part in the consultation and submitted their views. All these views have been considered as the proposals have been refined ahead of submitting the DCO application.
- 5.1.1.7 All feedback has been considered and the Applicants' regard to the feedback has been presented within this report and a summary has been given outlining where feedback has influenced the project design (as prescribed by section 49 of the 2008 Act).

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