

## **RELEVANT REPRESENTATION ON THE PROPOSED MORGAN AND MORECAMBE OFFSHORE WINDFARMS TRANSMISSION ASSETS DEVELOPMENT CONSENT ORDER APPLICATION (EN020032)**

### **INTRODUCTION**

This is a Relevant Representation regarding the Morgan and Morecambe Offshore Windfarms Transmission Assets Project, promoted by Morgan Offshore Wind Limited and Morecambe Offshore Windfarm Limited, made by the Wildlife Trust for Lancashire, Manchester and North Merseyside (Lancashire Wildlife Trust).

The Wildlife Trust for Lancashire, Manchester & North Merseyside was founded locally in 1962 as charity registered in England (Registered Charity No. 229325).

Since then, we have grown to be the largest nature conservation membership charity in our area, with 32,000 members and nearly 1000 volunteers. We are uniquely positioned to lead change across our region, working at a grass roots, local level whilst also being part of a strong cohesive movement – The Wildlife Trusts.

The Wildlife Trusts federation is a movement of 46 independent Wildlife Trusts covering the UK, the Isle of Man, and Alderney, together comprising the largest UK voluntary organisation dedicated to conserving all the UK's habitats and species, whether in the countryside, towns or at sea. We improve places for wildlife and strengthen the relationship between people and the natural environment. Our aim is to protect and create resilient ecosystems on land and in the sea.

### **GROUNDINGS OF OBJECTION**

Our primary concerns and disagreement arise from substantial deficiencies in the content and clarity of the applicant's submission, compounded by significant errors and omissions that have undermined confidence in its credibility. The assessment lacks the critical detail and data necessary to conduct a thorough and reliable evaluation of the potential impacts.

### **OFFSHORE ELEMENTS**

The Wildlife Trust for Lancashire, Manchester, & North Merseyside supports the North West Wildlife Trusts' joint response on the marine elements of the DCO. Please see the relevant representation from the North West Wildlife Trusts (Cumbria, Lancashire, and Cheshire) for full detail, but our principal concerns follow below:

#### **'Fylde' Marine Conservation Zone**

We are concerned that there is spatial overlap between the transmission asset and Fylde Marine Conservation Zone (MCZ), which has been designated for its subtidal sand and mud habitats. We would expect to see an in-principle Measures of Equivalent Environmental Benefit (MEEB) produced by the applicant.

The applicant states that there will be 30,400 m<sup>2</sup> of potential habitat loss in the MCZ. We believe this is a significant amount. We note that, at PEIR stage, Natural England advised that the applicants

should explore options for a Stage 2 MCZ assessment, including an in-principle MEEB Plan. That has not been done.

Placement of hard infrastructure on a soft sediment feature will lead to permanent change in, loss to, or damage to the feature for the lifetime of the project.

Every effort should be taken to limit and reduce cable protection in soft sediments, particularly designated areas and MCZs. We welcome the reduction of cable-protection infrastructure since PEIR; and the reduction in sand-wave clearance from 60% to 5% for the Morgan offshore export cables, and 30% to 5% for the Morecambe offshore export cables.

### **Subsea Construction Noise**

We are also concerned about the impact of subsea construction noise on marine life, particularly cetaceans. We welcome the recent changes in policy to underwater noise mitigation legislation. On 21st January, Defra (2025) published the Marine Noise Policy Paper – Reducing Marine Noise which states that *“From January 2025...all offshore wind pile driving activity across all English waters will be required to demonstrate that they have utilised best endeavours to deliver noise reductions through the use of primary and/or secondary noise reduction methods in the first instance.”* The applicant must therefore strengthen their commitment to employ mitigation to reflect this change in policy.

## **ONSHORE ELEMENTS**

### **Fylde Council District, Lancashire**

#### **INTERTIDAL AND ONSHORE INFRASTRUCTURE AREAS**

Whilst the 100m minimum offset distance from the SSSI boundary is noted (**Commitment Reference (CoT) 44**) & the disturbance risk to sand lizard already mentioned below, we do have concerns about possible physical or temporal overlap between the landfall and beach working/vehicular access routes with the Dunes Project’s work to accrete the dunes seawards in this area. We will comment further during the examination process. Unimpeded dune accretion is critical in the delivery of the [Shoreline Management Plan 22/11B.](#), specifically continuing dune maintenance to allow them to function as a defence along approximate current alignment.

**CoT110** is noted as is **CoT32**.

**Disturbance to SPA birds:** We will be commenting further regarding disturbance to SPA birds from the proposed inter-tidal works (including potential cable repair and re-burial during the projected 35-year project life as well as the potential re-powering option beyond that given the 60-year seabed lease).

**Fairhaven Saltmarsh Permanent Mitigation:** Based on long experience of working on this coast, we are very dubious that the proposed mitigation measures (**CoT113** and outlined in the Outline Ecological Management Plan) will be effective in mitigating for disturbance and temporary habitat loss on waders impacted by the Transmission Assets construction/operation and decommissioning.

**Compound 1 (Welfare) in North Beach car park:** You need to be aware that access to North Beach car park is integral to delivery of the Dunes Project. Parking for events/volunteers and staff is required and storage space for thousands of donated Christmas trees each year is non-negotiable. The precise siting of the welfare compound area will be critical given the duration of its presence.

**FYLDE SAND DUNES (Lytham St. Anne's SSSI, Local Nature Reserve, Biological Heritage Site, Geological Heritage Site)**

The [Fylde Sand Dunes Project](#) manages the sand dunes as a partnership project between Lancashire Wildlife Trust, Fylde and Blackpool Councils with Environment Agency funding. For clarity, these comments are made on behalf of [Lancashire Wildlife Trust](#) **ONLY & NOT** the other Project Partners.

We have serious concerns regarding the impact of the Project proposal on the Fylde Sand Dunes and their wildlife as outlined below:

- **Adverse hydrological impacts:** The Environmental Statement (ES) recognises that much of the Dunes' notified biological interest relates to hydrologically dependent surface water features which are already affected by aquifer abstraction and improved land drainage in the adjoining golf course. The ES also recognises that the proposal may result in groundwater levels being reduced as the entry pits are dewatered for excavation. Secondly, longer term, the presence of export cables beneath Lytham St Anne's SSSI may disrupt the aquifer that sustains the dune slacks on a temporary, long term or permanent basis. This is a huge 'known unknown' risk, the impact of which will not be clarified until after DCO consent is granted and at detailed design stage, when a hydrogeological risk assessment will be undertaken to inform the detailed site-specific crossing design (**CoT128**). We note that the Commitments Register references CoT41, 43, 44, 94, 104 and 119 amongst others are particularly relevant to this issue.
- **Disturbance to sand lizards:** A population of [sand lizards](#) (*Lacerta agilis*) -- one of the UK's rarest reptiles -- is located on the dunes following a successful reintroduction programme (2017-2021) and these are monitored annually by the Dunes Project and experts from Amphibian and Reptile Conservation. We will share our records on a redacted basis, but these records mean that we are extremely concerned that the use of the old sand-winning access and compound (repurposed as Compound 3 for this proposal) as the principal vehicular beach access from Clifton Drive North will cause disturbance, possibly direct conflict. The ES recognises the disturbance issue (through vibration), but seemingly only in relation to piling for cofferdams on the beach & not the use of the access track/compound 3. Track-widening and use of matting might also be an issue. Timing, season, and vehicle frequency and type will also be relevant considerations. **CoT79** will be especially relevant.
- **Inadequate data and errors in habitat mapping:** Dunes Project staff have identified that several areas of habitat on the Local Nature Reserve (LNR) have been wrongly mapped, *e.g.* dune slack areas mapped as scrub. This accuracy matters as it means that the site and ecological impacts may have been incorrectly assessed with scrub being less susceptible to hydrological influence than dune slacks. Key species have also been missed or vastly under recorded, *e.g.* Smooth Newt and hundreds of Common Toad. -There is a significant under recording of all species that have been presented on the maps, data could have been made available from the Dunes Project but was not requested. There is no specific species data for both insects and plants. Considering the ecological importance of the area and the rare and

endemic species present, these should have been identified within the environmental assessment.

**Impacts on Biological Heritage Sites (BHS) and other Important Ecological Features (IEFs) along the onshore cable route:** Whilst direct impacts are avoided on several BHS through the use of trenchless technology, other BHS & IEF's are directly affected, *e.g.* Lytham Moss BHS functionally-linked land and the two BHS ponds (Freshfield Farm Ponds – North, and - South) which will be destroyed by sub-station construction (**CoT122**), as will 2 other ponds. We note **CoT101**, which commits to the avoidance of high concentrations of peat along the cable route. Also, the avoidance of the Queensway Farmland Conservation Area. We will comment further on the efficacy of the mitigation proposals (both temporary and permanent) & impact on IEF's as the examination progresses. See also representation below on specific BHS in Preston City District and in South Ribble Borough.

**Mitigation Measures/Outline Ecological Management Plan/Outline Landscape Management Plan:** Many of the proposals are indicative at this stage and, in the case of the Outline Ecological Management Plan, all measures are subject to landowner agreement (**3.18.1.1**) and so delivery is not guaranteed, nor the duration of the measures. Again, more time is required to comment on the efficacy of these measures (or otherwise).

**Onshore Biodiversity Benefits Statement:** We note the use of voluntary Biodiversity Net Gain (BNG) in advance of the requirement for statutory BNG on NSIPs (from November 2025) and the aspiration to deliver 10% voluntary BNG. Also, the intention to look for additional enhancement opportunities (**1.10.1.1 – 1.10.1.2**) and will comment further.

**Great Crested Newts and District Level Licencing Scheme:** We note the intention to use this scheme within the dense Fylde pond-scape – a predominantly amber risk zone (**CoT92**).

### **Preston City District, Lancashire**

#### **Lea Marsh Biological Heritage Site (BHS)**

This saltmarsh BHS lies along the estuary of the Savick Brook where it flows into the northern side of the upper Ribble Estuary. This brook forms the boundary of Preston City District and Fylde Borough, the more extensive eastern section of the BHS being within the city, though that section appears to be omitted from the relevant map in **B14**.

Proposed temporary mitigation proposals for impact of construction on European Otter (*Lutra lutra*) to be delivered on this BHS – see **J6, 1.6.4.22 & c** - do not assess the potential impact of those proposals on the species and habitat features for which Lea Marsh is identified as a BHS.

The 'Biodiversity Benefit Area' proposals on farmland immediately to the west of Lea Marsh BHS – see **J11, pp 25-26 (fig 1.3); pp 31-32 (fig 1.6)** - are presented as not yet at the "*detailed design stage*", so are too generic to comment on effectively. That said, no consideration is given to potential benefits or disbenefits to the qualifying features of Lea Marsh BHS, or to that of Masons Wood BHS (an ancient woodland) partially adjacent to the eastern boundary of said proposed Biodiversity Benefit Area.

## **South Ribble Borough, Lancashire**

### **Howick Hall Ponds Biological Heritage Site (BHS)**

This pond-based BHS consists of two disjunct parts. The smaller, western part contains two ponds and lies extremely near the extant National Grid substation west of Penwortham. Mitigation is proposed, but details are too general at this stage to assess their likely effectiveness.

### **Mill Brook Valley Biological Heritage Site (BHS)**

Part of this species-rich grassland BHS is identified for potential destruction. No mitigation measures are apparent. There is a reference in '*Volume 3, Chapter 3: Onshore ecology & nature conservation*', paragraph **3.11.7.7** to mitigation proposals in '*section 3.11.5*' but no such section is apparent to us. Unless we have missed something, there is no mitigation proposal on which to comment.

## **LOCAL NATURE RECOVERY STRATEGY (LANCASHIRE COUNTY):**

The opportunity and risk afforded by linear infrastructure to contribute to and/or impede delivery of England's Nature Recovery Network as identified in the statutory Local (Lancashire) Nature Recovery Strategy (Environment Act 2021) appears unaddressed.

## **IN CONCLUSION**

The UK is facing several crises, all interlinked – climate, nature, energy, and cost-of-living. It is critical that global greenhouse gas emissions are reduced rapidly to keep climatic temperature rise below an average of 2°C globally, and that wildlife-rich natural systems are protected and restored. We face an ecological emergency with 41% of wild species in decline in the UK.

Consequent to our core charitable remit, our principal objective in responding to this, or any, national infrastructure proposal is to minimise further loss to the UK's and to our region's biodiversity and to maximise opportunities to deliver and secure its recovery. The Wildlife Trusts collectively, and The Wildlife Trust for Lancashire, Manchester, & North Merseyside locally, wish to engage constructively in this process to advocate for and ensure that outcome.

In transitioning to renewable energy, the UK will become primarily reliant on renewably generated electricity as a source of energy. This will require the construction and maintenance of extensive infrastructure, both onshore and offshore, to distribute electrical energy to where it is needed. That will involve the equivalent of the creation of an offshore grid network, in the Irish Sea and other UK waters, and significant onshore grid upgrades across the UK, including within and across our subregion. This must be planned and delivered in a holistic and coordinated way to ensure that impacts on nature's recovery are kept to a minimum, and that all new grid infrastructure results in a direct improvement to the natural environment to meet the UK Government's international treaty obligations and national statutory targets for nature's recovery.