

FURTHER SUBMISSION ON THE PROPOSED MORGAN AND MORECAMBE OFFSHORE WINDFARMS TRANSMISSION ASSETS DEVELOPMENT CONSENT ORDER APPLICATION (EN020032) – Additional to RR2180 and submitted by Interested Party Reference Number 20053970 (Lancashire Wildlife Trust, Registered Charity Number 229325)

INTRODUCTION

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

The Wildlife Trust for Lancashire, Manchester & North Merseyside was founded locally in 1962.

Since then, we have grown to be the largest nature conservation membership charity in our area, with 32,000 members and over 1,200 volunteers. We are uniquely positioned to lead change across our region, working at a grassroots, 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.

SUMMARY

- 1. Data deficiencies and uncertainties precluding effective analysis**
- 2. Fylde Marine Conservation Zone – need for MEEB to discourage cumulative “negligible” impacts**
- 3. Significant uncertainties about hydrological impact on key dune habitat & species**
- 4. Sand Lizard disturbance uncertainties and omissions**
- 5. Potential impact on Long-stalked Orache and / or Meadow Barley – special features of Lea Marsh Biological Heritage Site**
- 6. Potential degradation of the principal habitat feature of Millbrook Valley Biological Heritage Site, MG5 species-rich grassland**
- 7. Significant potential for loss of opportunity for a strategic approach to habitat creation, enhancement and expansion.**

OUTSTANDING CONCERNS

Our primary concerns and disagreement remain deficiencies in the content and clarity of the applicant's submission, compounded by 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 proposed development's potential impacts,

particularly in relation to hydrological impacts on Lytham St. Anne's Dunes SSSI & associated dune habitat & species.

With reference to the Applicants' responses to our Relevant Representation RR2180 (some of which also relate to Fylde Council's Relevant Representation concerning geographic areas of mutual interest e.g. Fylde Dunes and Foreshore), we would suggest that some matters might be resolved by meeting to clarify areas of common ground and updating each other on relevant data sets.

OFFSHORE ELEMENTS

The Wildlife Trust for Lancashire, Manchester, & North Merseyside supports the North West (of England) 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 are outlined 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 m² of potential habitat loss in the MCZ. We believe this to be 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.

Accordingly, we welcome the applicants' "without prejudice" agreement to produce a MEEB. However, we maintain that one should be required in principle as, given terrestrial experience, incremental small losses can lead to substantive cumulative impact and development of offshore transmission assets is predicted to increase exponentially in UK waters.

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."* We consequently also welcome the applicants' strengthening of 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 (66 months duration) overlap between the landfall and beach working/vehicular access routes with the Fylde Sand Dunes Project's work to accrete the dunes seawards in this area. Unimpeded dune accretion is critical in the delivery of the Shoreline Management Plan 22/11B, specifically continuing dune maintenance to allow these to function as a soft sea defence along approximate current alignment.

Most dune accretion work focuses on accreting the dune toe seawards, by installing parallel lines of posts and chestnut paling each year, which are supplemented by the planting of donated/recycled Christmas trees and planting of Marram and Lyme Grass plugs or transplants. Together, these work to trap windblown sand and advance the dune toe seawards, creating new dune habitat. Annual accretion of 10 metres has been achieved in places. In 2025, volunteers at the annual Christmas tree planting event delivered 1km of new, linear sea defence in 3 days.

We note (s3.11.13.8), that the beach compound 2 (exact location to be confirmed – 2,500m² in extent within 4A4B) will be kept a minimum 15m distance from the front of the dune system, which is very much closer than the 100m standoff required for the exit pits (CoT44). We highlight this point in the context of dune accretion rates and the need for access for machinery & large numbers of staff/volunteers to support dune accretion works, particularly during our annual large-scale Christmas tree 'planting' event (Jan/Feb – tide dependent). A minimum 15m distance also brings compound works very much closer to sand lizard habitat in the foredunes.

We also note that post-construction, further beach compounds may be required in the event of cable repair/reburial during the operational life of the development (35 years, possibly longer if re-powered to take advantage of the 60-year seabed lease).

We welcome the Applicant's response to RR 2180.9 in that they will engage with the Dunes Project to ensure that the construction phase does not compromise the delivery of dune accretion in this area. If planned delivery is impacted, this compromises the delivery of the Shoreline Management Plan and the works to achieve SSSI Favourable Condition Status.

CoT110 is noted as is **CoT32**.

Disturbance to SPA birds: We concur with Natural England's representations and will not repeat those here.

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.

We doubt that the proposed soft fencing and signage would be an effective deterrent to bird disturbance from people and especially dogs, as this is a heavily used stretch of coast. More information is also required on fencing specification and installation to ascertain any impacts on saltmarsh and local coastal processes. Wardening may be beneficial, but we would advise

the Applicants to engage with Fylde Council Coast and Countryside Service to better understand recreational patterns and bird issues in this specific area. We also note that Natural England has major reservations (comments H60/61 in Appendix H of its RR) regarding the data used, proposed mitigation efficacy and justification.

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. We welcome the applicants' commitment to deliver on same, though the devil will be in the detail.

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 and Fylde and Blackpool Councils, with Environment Agency funding. For clarity, comments here 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:

Our key concerns remain disturbance to sand lizards and the lack of clarity regarding impacts on the water table that may adversely affect sand dune habitat/species and humid dune slacks (both being groundwater dependent features and ecologically/hydrologically vulnerable).

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. All are particularly relevant to this issue.

We concur with the comments of both Natural England and the Environment Agency, in advising that further information is needed on the position of the water table of Lytham St. Anne's Dunes SSSI and related dune habitats. Natural England advise the installation of an appropriate number & distribution of dip-wells to provide a baseline detailed picture of the position of the water table and fluctuations (pre and post construction). In addition, modelling is required to determine the position of the water table and any fluctuations that may arise as part of the proposed development (dewatering of Transition Joint Bays and Direct Pipe Trenchless Technique cable installation beneath the dunes). The Monitoring Plan also needs to make

provision for measuring hydrological change and any impacts on humid dune slacks (species and habitat) & thus whether proposed mitigation measures have been effective (or not).

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 (sightings of adults/juveniles/hatchlings) by the Dunes Project and local experts from Amphibian & Reptile Conservation. We will share our most recent records (2024) on a redacted basis (heat maps), 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. 2025 sand lizard surveys are underway, with 50+ sightings to date and the earliest sightings on record (March). We do have point data that we can share but **only on a redacted basis, with guarantees required that it will not be released into the public domain.**

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. Sand is an unstable substrate and may be vulnerable to slumping, possibly causing the collapse of sand lizard burrows onto hibernating/breeding sand lizards. Track-widening and use of matting might also be an issue as surveys show that sand lizards are known to preferentially bask on the northern edge of the track and are also concentrated around Compound 3. Timing, season, vehicle frequency and type will also be relevant considerations as will be plans for compound fencing, lighting and use of matting within compounds. It has been extremely difficult to determine from the ES exactly when the access track will be in use and thus whether sand lizards are likely to be active or in hibernation. We note from Natural England's Relevant Representation (comment G32) that on the Formby foredunes, where Sand Lizards are also present, works likely to cause disturbance have been restricted to April/May. **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 (e.g. the sole surviving specimen of the nationally rare Hybrid Willow (*Salix x friesiana*), these should have been identified within the environmental assessment.

We note that Natural England also have similar concerns (G17) regarding data gaps and the consequent difficulty in accurately assessing ecological impacts arising from the proposed development, most especially in relation to water table change impacting humid dune slacks.

Point of information - forthcoming ecological surveys (Summer 2025):

- In Summer 2025, an ecological consultant (Graeme Skelcher) will be repeating his previous NVC and Notable Plant surveys (last conducted in 2009/10/16/17) as well as saltmarsh surveys. Our Future Coast is funding these surveys so its permission will be required to share the data.
- Invertebrate surveys of the SSSI will also be undertaken in Summer 2025 by the Tanyptera Trust. Again, its consent would be required for data sharing.

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 would be destroyed by sub-station construction (**CoT122**), as would 2 other ponds. We note **CoT101**, which commits to the avoidance of high concentrations of peat along the cable route. Regarding peat deposits, the interactive England Peat Map was published by DEFRA on 12/5/25 providing a further source of updated information. A quick check of the map seems to reveal peat deposits below the Lytham St. Anne's LNR, which may have hydrological implications. Also, the avoidance of the Queensway Farmland Conservation Area. 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. Time constraints and the putative nature of these documents have limited further comment.

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**). Again, time constraints limit further comment.

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)

Our Relevant Representation stated:

“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 was omitted from the relevant map in **B14**.”

The applicants’ response states that,

“There is an omission on the Onshore Statutory and Non-Statutory Nature Conservation Sites Plan (APP-161) (B14) in the lack of BHS shading for Lea Marsh (APP-161). This will be updated for Deadline 1. The full and correct boundary of the site is provided in Volume 3, Annex 3.1: Onshore Ecology desk study technical report (APP-075) and this was used as the basis for assessing impacts on the BHS.”

We welcome the applicants’ intention to update the ‘Onshore Statutory & Non-statutory Nature Conservation Sites Plan’ (APP-161) (B14) to shade all of Lea Marsh BHS, so including the sector east of the Savick Brook channel, which sector lies within Preston City District.

The applicants’ response further states that,

“The temporary mitigation measures to be delivered within Lea Marsh BHS for otter set out in paragraph 1.5.3.63 of the Outline Ecological Management Plan (APP-212) are relatively limited in nature, and include the provision of artificial holts, improvement of reedbeds and invasive non-native plant species control, none of which would reasonably adversely affect any of the interest features of the Lea Marsh BHS.”

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** – still do not explicitly assess the potential impact of those proposals on the species and habitat features for which Lea Marsh is identified as a BHS.

The outline description of the proposed adjacent mitigation for displaced European Otter (*Lutra lutra*), whilst welcomed in principle, lacks detail to reassure on its potential impact on some of the identified selection features for Lea Marsh BHS. Of note in that regard is the occurrence of **Long-stalked Orache (*Atriplex longipes*)**, a nationally scarce species of brackish upper saltmarsh habitat, and **Meadow Barley (*Hordeum secalinum*)**, a perennial species of old grassland included in the *Provisional Lancashire Red Data List of Vascular Plants*. Direct disturbance, changes in salinity, and grassland management consequent on the proposed mitigation management for potentially displaced otters may or may not impact on either or both species populations - positively or negatively - depending on where the mitigation measures were to occur and how it would be managed.

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.

The applicants’ response goes on to state that,

“With reference to the proposed biodiversity benefit set out in the Onshore Biodiversity Benefit Statement (AS-054), the size of the proposed biodiversity benefit site and its current habitats have been selected based on the quantified impacts of the permanent above ground elements of the scheme, to ensure that there is scope to provide biodiversity benefit.”

The applicants’ response is welcome as far as it goes but, if said biodiversity benefit were to be developed in isolation from the adjacent ecological landscape, it would risk missing the opportunity to (re)create an ecotone from the ancient woodland edge habitat of Masons Wood BHS to the brackish upper saltmarsh habitat of Lea Marsh on the Savick Brook estuary in line with the Lawton Principles, as enacted in the Environment Act 2021.

South Ribble Borough, Lancashire

Howick Hall Ponds Biological Heritage Site (BHS) 52NW11 (note “Ponds” plural)

Our Relevant Representation stated:

“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.

The applicants’ response is as follows:

“Potential impacts to this pond [*sic*] have been assessed as negligible (see section 3.11.6 of Volume 3, Chapter 3: Onshore ecology and nature conservation (APP-075). Mitigation measures have been outlined in the Outline Ecological Management Plan (OEMP) APP-212. The Applicants have made a commitment (CoT76 of Volume 1, Annex 5.3: Commitments Register of the ES (AS-030)) to develop detailed Ecological Management Plan(s) in accordance with the OEMP (APP-212) and will include pre-construction, construction and post-construction mitigation measures relating to habitats. This is secured by Requirement 12 within Schedules 2A & 2B of the draft Development Consent Order (AS-004). Detailed Ecological Management Plan(s) will be implemented by the Applicants as approved by Requirement 12 in consultation with relevant stakeholders, as appropriate.

The OEMP provides for the mitigation measures to be implemented to protect great crested newt (GCN) which include but are not limited to:

The installation of exclusion fencing prior to construction, where appropriate;
Cessation of works if GCN are found including contacting a Natural England GCN licenced ecologist to handle and, where necessary relocate GCN to outside the exclusion fence line and to provide further advice where necessary.”

The generic provision for Great Crested Newt is welcomed, but that is but one of the multiple features for which Howick Hall Ponds BHS is so identified.

By way of background and picking out the key qualifying features from the relevant BHS description text, the site comprises **a cluster of field ponds and associated terrestrial habitat** on the western outskirts of Penwortham. It is made up of two separate parcels of land lying east and west of Howick Cross Lane, **the latter being most directly impacted by the proposed**

development. The ponds vary considerably in character and in the range of plants and animals that each support.

Collectively the ponds support a substantive breeding amphibian population - **Common Frog, Common Toad, Smooth Newt, and Great Crested Newt.** The adjoining Blashaw Wood, Blashaw Dam Wood, ponds and grassland to the east provide additional valuable amphibian habitat.

The pond cluster also supports **a good range of invertebrates including three nationally scarce species of water-beetle.** These are *Ilybius guttiger* (a predaceous diving-beetle), *Cercyon ustulatus* (a water scavenger-beetle) and *Helochaeres lividus* (also a water scavenger-beetle).

The ponds are well vegetated and support a rich diversity of aquatic and marginal plant species of which **Lesser Marshwort (*Apium inundatum*) and Horned Pondweed (*Zannichellia palustris*)** are included in the ***Provisional Lancashire Red Data List of Vascular Plants*.** Four other species from the *Provisional Lancashire Red Data List* are present, namely White Waterlily, Greater Spearwort, Water-soldier and Galingale. However, the presence of these latter species may be the result of deliberate introductions.

There does not appear to be any reference to potential impacts specifically on these qualifying features of Howick Hall Ponds BHS in section 3.11.6 of Volume 3, Chapter 3: *Onshore ecology and nature conservation* (APP-075).

There does not appear to be any reference to proposed specific avoidance or mitigation measures for potential impacts on these qualifying features of Howick Hall Ponds BHS in the Outline Ecological Management Plan (OEMP) APP-212.

Accordingly, we must continue to reserve our position in the absence of the putative Detailed Ecological Management Plan.

Mill Brook Valley Biological Heritage Site (BHS) 52NW01

The applicants' response to our initial submission is as follows:

““The reference to paragraph 3.11.5 of Volume 3, Chapter 3: Onshore ecology and nature conservation (APP-075) refers to the potential impacts on the BHS rather than mitigation, in the context of ecological networks. Potential impacts on BHS sites specifically are discussed in paragraph 3.11.6 of Volume 3, Chapter 3: Onshore ecology and nature conservation (APP-075). Mitigation for potential effects on Mill Brook Valley BHS are discussed in paragraph 3.11.6.52 and CoT126 of Volume 1, Annex 5.3: Commitments Register of the ES (AS-030). The Applicants have made a commitment (CoT126 of Volume 1, Annex 5.3: Commitments Register of the ES (AS-030)) to mitigate for potential temporary habitat loss associated with Mill Brook Valley Biological Heritage Site. Temporary construction compounds will be micro-sited to avoid the site wherever reasonably practicable. This is secured by Requirement 8 within Schedules 2A & 2B of the draft Development Consent Order (AS-004).

“The Applicants have made a commitment (CoT76 of Volume 1, Annex 5.3: Commitments Register of the ES (AS-030)) to develop detailed Ecological Management Plan(s) in accordance with the OEMP (APP-212) which will include measures for habitat restoration including grassland at Mill Brook Valley BHS. This is secured by Requirement 12 within Schedules 2A & 2B of the draft Development Consent Order (AS-004). Detailed Ecological Management Plan(s) will be implemented by the Applicants as approved by Requirement 12 in consultation with relevant

stakeholders, as appropriate. In addition, the Applicants have made a commitment (CoT27 of Volume 1, Annex 5.3: Commitments Register of the ES (AS-030)) to reinstate all temporary construction compounds once construction has been completed including the micro-sited compounds at Mill Brook Valley BHS. This is secured by Requirement 8 within Schedules 2A & 2B and Requirement 16 of Schedules 2A & 2B of the draft Development Consent Order (AS-004).”

We welcome the applicants’ clarification of what has been a bewildering array of online documents to identify, locate and assess in the very limited core charitable time available to us.

The applicants indicate, in paragraph 3.11.6 of Volume 3, Chapter 3: *Onshore ecology and nature conservation* that,

*“Habitat would be reinstated but the impact will be long term and there is a risk that habitat of comparable quality cannot be provided or maintained. Therefore, the magnitude of impact would be up to **high**.”*

The proposed mitigation, as outlined, would seem to have a reasonable chance of partial success and we cautiously welcome it on that basis. However, we cannot be more confident than that in our assessment at this stage and, given the magnitude of impact would be up to “*high*” and would be on an area of irreplaceable species-rich grassland habitat, now very scarce at national and county levels, we must continue to reserve our position in the absence of the putative Detailed Ecological Management Plan.

Semi-natural grassland is one of the most threatened habitats in the UK, with a reported 97% loss of semi-natural enclosed grasslands in England with Wales between 1930 and 1984. Most of the lowland semi-natural grassland in England has been degraded in terms of its species-diversity as a side-effect of successive Government policy driven measures taken in the latter half of the 20th century to unsustainably intensify agricultural production, and the grasslands in lowland Lancashire are no exception.

Ancient species-rich semi-natural grasslands are an important part of Lancashire’s critical environmental capital that is difficult or impossible to replace once destroyed. Now uncommon, these are thought to be being lost faster than any other type of terrestrial wildlife habitat. They are extremely vulnerable to agricultural improvement since many species are lost when soil fertility is increased; and to neglect, as a few common plant species tolerant of eutrophication become dominant in ungrazed and uncut swards. The more natural and species-rich sites that remain are now often small and isolated but may still support communities of specialised plant and animal species, albeit at increased risk of local extinction.

LOCAL NATURE RECOVERY STRATEGY (LANCASHIRE COUNTY):

Our Relevant Representation stated:

“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.”

The applicants’ response to our representation is as follows:

“The Local Nature Recovery Strategy for Lancashire was considered in the writing of Volume 3, Chapter 3: Onshore ecology and nature conservation (APP-075) (see section 3.6.1.19 (APP-075)). The issue of landscape connectivity is addressed through the consideration Ecological

Networks (APP-075, Section 3.11.7). This included Lancashire Grassland and Woodland Networks identified by LERN as the foundation for the emerging LNRS for Lancashire. Indirectly, landscape connectivity has also been addressed through consideration of statutory and non-statutory designated nature conservation sites, priority habitats and ancient woodland, as well as connectivity for protected species where they occur within the Order Limits. The Applicants have made a commitment (CoT76 of Volume 1, Annex 5.3: Commitments Register of the ES (AS-030)) to develop detailed Ecological Management Plan(s) in accordance with the OEMP (APP-212) which will include measures for habitat restoration following construction with appropriate management and monitoring. This is secured by Requirement 12 within Schedules 2A & 2B of the draft Development Consent Order (AS-004). Detailed Ecological Management Plan(s) will be implemented by the Applicants as approved by Requirement 12 in consultation with relevant stakeholders, as appropriate. The Applicants consider the commitments to robust mitigation for impacts on ecological networks, habitats, designated sites and protected species will mean delivery of the emerging LNRS and therefore delivery of Natural England's Nature Recovery Network will not be impeded."

The response is noted and is accepted in terms of minimisation of impact on the county's nature recovery network. However, investigation of potential opportunities for *significant* creation, enhancement and extension of ecologically appropriate linear wildlife habitat connectivity along the route of the terrestrial transmission infrastructure would appear to have been missed, at least at this stage.

Extensive road, rail and energy network developments are planned across the north of England. This affords an opportunity to ensure biodiversity and environmental net gain work across these networks whilst also improving their resilience to climate change; and to identify and create new green infrastructure to provide a range of benefits including mitigation of the adverse effects of said networks, improvements to ecological connectivity, and provision of ecosystem services.

The consultation draft of the Lancashire Local Nature Recovery Strategy and related network was launched on **16th May 2025**, so that draft will now be available for consideration.

TO CONCLUDE ...

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.