

MORGAN AND MORECAMBE OFFSHORE WIND FARMS: TRANSMISSION ASSETS

**The Applicants' Response to Relevant Representations Part 1-
Introduction and thematic responses**

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1 The Applicants' comments on Relevant Representations

1.1 Introduction

- 1.1.1.1 On 7 February 2025 the Examining Authority (ExA) published the Relevant Representations for the Morgan and Morecambe Offshore Wind Farms: Transmission Assets, (hereafter, "Transmission Assets").
- 1.1.1.2 This document provides Morgan Offshore Wind Limited and Morecambe Offshore Windfarm Limited (hereafter, 'the Applicants') comments on the Relevant Representations.
- 1.1.1.3 In total, 2302 Relevant Representations were submitted to the ExA by the deadline on 27 January 2025. A further 10 submissions were accepted at ExA's discretion outside of this deadline, equalling a total of 2312 Relevant Representations submitted. Of the 2312, 2157 were identified as being from members of the public.

1.2 Outline of Approach

- 1.2.1.1 The Applicants have reviewed all 2312 of the Relevant Representations submitted and this document sets out the current position of the Applicants in response to the 2157 Relevant Representations submitted by members of the public.
- 1.2.1.2 Due to the volume of Relevant Representations received, particularly from the public, the Applicants have identified the themes raised and have addressed them in Section 2. The Applicants have summarised the points raised and provided a collective response. This approach has been adopted to avoid extensive repetition throughout the response document.
- 1.2.1.3 The Applicants recognise that there are specific matters raised by Statutory Parties (Local Authorities, Agencies, People with Interest in Land etc.) and these have been addressed in The Applicants' Response to Relevant Representations Part 2- Affected parties and statutory consultees' (document reference S_PD_3.2) and its supporting annexes.
- 1.2.1.4 The Applicants would note that this approach is preceded in recent examinations for Development Consent Orders (DCOs) which received a high number of public relevant representations. This includes the DCO applications for Byers Gill Solar, which is at decision stage, and Sunnica Energy Farm, which was granted consent in July 2024. The Applicants therefore understand this to be an acceptable approach to enable the Examining Authority to efficiently review how the Applicants have assessed and responded to the points raised by the public.

1.3 Structure of the document

- 1.3.1.1 The structure of this document is:
- 1.3.1.2 Section 1 is an introduction outlining the Applicants approach.

- 1.3.1.3 Section 2 is the Applicants' comments on the Relevant Representations submitted by theme.
- 1.3.1.4 In addition, the Applicant has provided a full response to Fylde Against Cable Transmission and Substations (RR-704) in Annex 3.1.1 to Response to RR -Fylde Against Cable Transmission and Substations (RR-704) (document reference S_PD_3.1.1).
- 1.3.1.5 To support the submission of the Relevant Representations, a second document entitled 'The Applicants' Response to Relevant Representations Part 2- Affected parties and statutory consultees' (document reference S_PD_3.2) has been produced, this document has a number of additional annexes:
- Annex 3.2.1 to Response to RR - BAE Systems (RR-208) (document reference S_PD_3.2.1)
 - Annex 3.2.2 to Response to RR - Blackpool Borough Council (248) (document reference S_PD_3.2.2)
 - Annex 3.2.3 to Response to RR - Environment Agency (RR-677) (document reference S_PD_3.2.3)
 - Annex 3.2.4 to Response to RR - Lancashire Association of Local Councils Fylde Area Committee Energy Working Group (RR- 1261) (document reference S_PD_3.2.4)
 - Annex 3.2.5 to Response to RR - Lancashire County Council (RR-1262) (document reference S_PD_3.2.5)
 - Annex 3.2.6 to Response to RR - Marine Management Organisation (RR-1414) (document reference S_PD_3.2.6)
 - Annex 3.2.7 to Response to RR - Natural England – Main (document reference S_PD_3.2.7)
 - Annex 3.2.8 to Response to RR - Natural England (RR- 1601) - Appendix A (DCO) (document reference S_PD_3.2.8)
 - Annex 3.2.9 to Response to RR – Natural England (RR- 1601) - Appendix B (Physical processes) (document reference S_PD_3.2.9)
 - Annex 3.2.10 to Response to RR - Natural England - Appendix C (Benthic Subtidal and Intertidal Ecology) (document reference S_PD_3.2.10)
 - Annex 3.2.11 to Response to RR - Natural England (RR- 1601) - Appendix D (Fish and Shellfish) (document reference S_PD_3.2.11)
 - Annex 3.2.12 to Response to RR - Natural England (RR- 1601) - Appendix E (Marine Mammals) (document reference S_PD_3.2.12)
 - Annex 3.2.13 to Response to RR - Natural England (RR- 1601) - Appendix F (Offshore Ornithology) (document reference S_PD_3.2.13)

- Annex 3.2.14 to Response to RR - Natural England (RR- 1601) - Appendix G (Onshore Ecology and Nature Conservation) (document reference S_PD_3.2.14)
- Annex 3.2.15 to Response to RR - Natural England (AS-066) - Appendix G1 (Onshore Ecology and Nature Conservation – Additional Submission) (document reference S_PD_3.2.15)
- Annex 3.2.16 to Response to RR - Natural England (RR- 1601) - Appendix H (Onshore and Intertidal Ornithology) (document reference S_PD_3.2.16)
- Annex 3.2.17 to Response to RR - Natural England (RR- 1601) - Appendix I (Fylde MCZ) (document reference S_PD_3.2.17)
- Annex 3.2.18 to Response to RR- Newton with Clifton Parish Council (RR-1616) (document reference S_PD_18)
- Annex 3.2.19 to Response to RR - South Ribble Borough Council (RR- 2027) (document reference S_PD_3.2.19)
- Annex 3.2.20 to Response to RR – Treales Roseacre & Wharles Parish Council (RR-1616) (document reference S_PD_3.2.20)
- Annex 3.2.21 to Response to RR - Freckleton Parish Council (RR- 703) (document reference S_PD_3.2.21)
- Annex 3.2.22 to Response to RR - Preston City Council (RR- 1775) (document reference S_PD_3.2.22)
- Annex 3.2.23 to Response to RR - Fylde Borough Council (RR- 705) (document reference S_PD_3.2.23)

1.4 Use of AI in the preparation of this document

- 1.4.1.1 Due to the high volume of Relevant Representations and time available it has not been possible for the Applicants to provide individual responses to each Relevant Representation. However, the Applicants would like to acknowledge and thank those who provided Relevant Representations for taking part in the Application process.
- 1.4.1.2 The large volume of Relevant Representations means that the Applicants have used an AI tool called Harvey to assist with thematic and then quantitative analysis of Relevant Representations to help prepare responses that deal with the concerns raised by those Relevant Representations for which it has not been possible to provide a direct response. For the avoidance of doubt, AI has not been used in the preparation of the actual response to issues raised. It has solely been used to identify issues and then carry out numerical calculations.
- 1.4.1.3 For the purposes of this document we will refer to the AI tool as “Harvey”, further details on Harvey can be found at <https://www.harvey.ai/>
- 1.4.1.4 Use of Harvey by the Applicants has had regard to the Planning Inspectorate’s Guidance titled “Use of artificial intelligence in casework evidence” which was current at the time of this submission, version dated

6 September 2024. To assist the Examining Authority the following confirmation are provided per the AI Guidance:

AI Guidance Requirements	Applicants' Response
Clearly label where you have used AI in the body of the content that AI has created or altered, and clearly state that AI has been used in that content in any references to it elsewhere in your documentation.	In this document where a percentage figure is used to identify volume of Relevant Representations relating to certain topics this has been generated by Harvey coupled with a human audit.
Tell us whether any images or video of people, property, objects or places have been created or altered using AI	Harvey has solely been used to identify issues and then carry out numerical calculations.
Tell us whether any images or video using AI has changed, augmented, or removed parts of the original image or video, and identify which parts of the image or video has been changed (such as adding or removing buildings or infrastructure within an image).	Harvey has solely been used to identify a list of issues and then carry out numerical calculations.
Tell us the date that you used the AI.	Harvey was used between the 8th and 11th of April 2025.
Declare your responsibility for the factual accuracy of the content.	As with any use of statistics there may be margins of error but the Applicants believe the figures generated by Harvey coupled with a human audit are accurate.
Declare your use of AI is responsible and lawful.	Confirmed
Declare that you have appropriate permissions to disclose and share any personal information and that its use complies with data protection and copyright legislation.	No disclosure or sharing of personal information is relevant to the Applicants use of Harvey.

1.4.1.5 To give the Examining Authority further comfort on the use of Harvey, we have set out below a high level explanation of approach. The Applicants' approach to the use of Harvey has been in three stages:

1. Stage 1 - All Relevant Representations were analysed to identify areas of concern for the Applicants to provide responses to. This resulted in 31 categories being identified;
2. Stage 2 – A sample of 25% of Relevant Representations were analysed by Harvey to establish the number of Relevant Representations which raised each of the categories identified in Stage 1; and
3. Stage 3 – A manual check of Harvey's outputs across all categories has been undertaken.

1.4.1.6 With regards to stage 2, the Applicants consider that 25% of Relevant Representations, being approximately 500, is a reasonable sample size based on the issues Harvey identified coupled with the professional judgement of the communications team advising the Applicants who have reviewed all of the Relevant Representations.

1.4.1.7 The output of the above exercise has resulted in the figures used in this document.

2 Response to common themes raised within Relevant Representations

2.1 Introduction

2.1.1.1 This section sets out the Applicants' response to common themes raised within the Relevant Representations submitted by members of the public.

2.1.1.2 For each theme listed below the Applicants have provided a high-level outline of the comments submitted and the Applicants' response.

2.1.1.3 As is detailed further in section 1.4 above, the Applicants set out how many Relevant Representations raised each theme. This is set out below.

2.1.1.4 The following themes have been raised and addressed below (noting they are presented in alphabetical order and this is not an indication of any level of importance afforded to the themes by the Applicants):

- Adequacy of consultation and ongoing communication
- Agricultural impact
- Air quality
- Beach access
- Blackpool Airport
- Carbon and greenhouse gases
- Community
- Construction
- Cumulative effects
- Development Consent Order
- Ecology
- Electro-Magnetic Fields (EMF)
- Environment
- Equestrian
- Flooding
- Green Belt
- Heritage and archaeology
- Human health
- Landscape and visual impact
- Local economy
- Local project benefits
- Marine environment
- Noise

- Planning policy
- Principles of the Transmission Assets
- Property prices
- Recreational spaces
- Safety
- Sand dunes
- Site selection and assessment of alternatives
- Traffic and transport

2.2 Adequacy of consultation and ongoing communication

2.2.1 Summary of matters raised

- 2.2.1.1 Some Relevant Representations were critical of the consultation process, stating that there had been limited communication and insufficient engagement from the Applicants; that the process had been “underhand”; and that queries raised in the consultation had not been responded to adequately. In addition, a number of people stated that they were not aware consultation activities had taken place.
- 2.2.1.2 Some Relevant Representations stated that the level of information provided had been insufficient and complained that visualisations to show what the Transmission Assets would look like once built had not been provided. Some Relevant Representations stated that the Application was too complex for a layperson to understand and that the Applicants had submitted information which was deliberately difficult to follow.
- 2.2.1.3 Some Relevant Representations queried why it had been reported that the Applicants have signed Non-Disclosure Agreements with local authorities.
- 2.2.1.4 Some Relevant Representations raised concerns about the ongoing nature of communication throughout the construction phase and wanted assurance that they would be kept informed.
- 2.2.1.5 The theme of adequacy of consultation and ongoing communication with the community was raised by approximately 14% of Relevant Representations.

2.2.2 Applicants’ response

Consultation

- 2.2.2.1 The Applicants have undertaken a number of non-statutory consultations, alongside statutory consultations in accordance with the Planning Act 2008. A range of consultation events were held in the vicinity of the proposed Transmission Assets, including online events, exhibitions and pop-up events between November and December 2022, April and June 2023, and October and December 2023. These events

were advertised in local newspapers, on local radio, on posters in the local area, through postcards and newsletters distributed through the local area and on social media.

2.2.2.2 Further details can be found in the Consultation Report (APP-170).

2.2.2.3 The Applicants note that the Application has been accepted for Examination and they have complied with their statutory consultation duties and also undertaken non-statutory consultation. Full details of the Applicants' statutory and non-statutory pre-application consultation is set out in the Consultation Report (APP-170) and associated annexes. The Applicants refer to the Acceptance Checklist (s55) (PD-003) where the Planning Inspectorate confirms in relation to adequacy of consultation it "is satisfied that the Applicants have complied with their statutory obligations."

Visualisations

2.2.2.4 The landscape and visual assessment is detailed within Volume 3, Chapter 10: Landscape and visual resources (APP-123). The assessment is informed by 18 representative viewpoints, as described in Table 10.11 of APP-123 and the location of the viewpoints is shown in Figure 10.2 (Volume 3, Figures – Part 5 of 7 (APP-135)). The viewpoint visualisations are shown on Figure 10.5 (Volume 3, Figures – Part 6 of 7 (APP-136)) which supports the Landscape and Visual Impact Assessment (LVIA) and have been produced in accordance with Type 2 of the Landscape Institute's Technical Guidance Note 06/19 Visual Representation of Development Proposals.

2.2.2.5 It should be noted that the assessment of visual effects is based on field work and supported by the figures and visualisations and is not based entirely on the representative viewpoints themselves.

Application documents

2.2.2.6 As part of the application, the Applicants have submitted a Non-Technical Summary (NTS) (APP-020). This document provides an overview of the Environmental Impact Assessment (EIA), including the main findings in non-technical language. It provides information on the proposed development, key findings of the EIA, proposed mitigation measures and alternatives considered.

2.2.2.7 The Applicants are committed to open and transparent communication and have been engaging with local authorities on a range of matters. Non-Disclosure Agreements have only been used where the Applicants have been discussing commercially sensitive information with third parties.

Future engagement

2.2.2.8 An Outline Communications Plan (APP-194) was submitted as part of the application which sets out a framework for engaging stakeholders (i.e., sets out methods of contacting and engaging with affected groups; methods of providing advance notifications); roles and responsibilities for

implementing the communication plan; and complaints procedure. Detailed Communication Plan(s), which will be developed from the Outline Communication Plan (APP-194) and, which forms part of the CoCP(s). The detailed CoCP(s) are secured by Requirement 8 of Schedules 2A and 2B of the draft DCO (AS-004). Detailed Communication Plan(s) will be implemented by the Applicants as approved by the relevant local planning authorities in consultation with the relevant statutory stakeholders, as appropriate.

2.3 Agriculture

2.3.1 Summary of matters raised

- 2.3.1.1 Some Relevant Representations objected to the loss of agricultural land, citing concerns including impact on food security; the possibility of exacerbating high food prices; the potential for a negative impact on nearby farms; and the need to retain agricultural land to support diverse ecology. Some Relevant Representations also raised concerns regarding the impacts to livestock.
- 2.3.1.2 The theme of agricultural impact was raised by approximately 32% of Relevant Representations.

2.3.2 Applicants' response

Loss of Agricultural Land and Food Security

- 2.3.2.1 The importance of balancing national energy security with the need to protect productive farmland has been a consideration in the site selection, refinement and design process (Environmental Statement Volume 1, Ch 4 Site Selection and Consideration of Alternatives (AS-026)) and Volume 3 Ch 6 Land Use and Recreation as well as the Statement of Reasons (AS-009)).
- 2.3.2.2 In recognition of this balancing act, the Applicants have sought to minimise impacts on agricultural land:
- Through the design of the Transmission Assets;
 - Through their proposed use of temporary possession and compulsory acquisition powers; and
 - Through implementing measures to mitigate impacts on soils during construction and providing for restoration of agricultural land.
- 2.3.2.3 With regards to permanent land take, the Environmental Statement Land Use Chapter (APP-104) sets out the impacts on agricultural land at section 6.11.2. With regards to agricultural permanent land take, paragraph 6.11.29 notes that “the total area of the permanent land take at the onshore substations would be approximately 25.7 ha. The areas of the link box covers would also affect a small additional area of approximately 0.1 ha of land in total.” This equates to approximately 25.8 ha (64 acres).

- 2.3.2.4 In addition, paragraph 6.6.2.11 of the Environmental Statement Land Use Chapter (APP-104) sets out that approximately 68.9 ha of agricultural land will be subject to permanent land take for biodiversity benefit, enhancement or mitigation areas.
- 2.3.2.5 Paragraph 1.7.1.13 of the Statement of Reasons (AS-009) acknowledges that, whilst much of the Transmission Assets comprises buried cable and will therefore be returned to productive agricultural use post construction, some permanent loss of agricultural land is unavoidable. In particular, the land required for the substations will result in a permanent loss of agricultural land. However, where permanent land take is required for substations and associated infrastructure the Applicants have sought to minimise the amount of land to be permanently acquired by, for example, locating the substations within existing field and ownership boundaries where practicable.
- 2.3.2.6 Paragraphs 1.7.1.14 to 1.7.1.18 further summarise the additional ways that the Applicants have sought to minimise both permanent and temporary impacts on agricultural land through their design work following feedback from landowners. This includes adjusting permanent access tracks to minimise severance and wherever possible use existing routes, and micro siting of compounds to minimise the number of affected parties.
- 2.3.2.7 The National Food Strategy Review sets out the complex nature of food security and notes that climate change poses a significant threat to food security and pricing. The Transmission Assets are required to connect the Generation Assets of the Morgan Offshore Wind Project and the Morecambe Offshore Windfarm to the UK electricity transmission network supporting the UK Government's ambition to deliver 50 GW of offshore wind by 2030, securing our energy supply and the UK's response to the climate change crisis.
- 2.3.2.8 Following completion of the construction of the Transmission Assets, local farmland along the onshore export cable corridor and 400kV grid connection cable corridor will be able to return to normal agricultural operations. This is because the onshore export cables will be buried to a depth where agricultural practices can continue safely. In addition, any areas required on a temporary basis to facilitate construction of the onshore substations will also be reinstated at the end of construction and returned to agricultural use.
- 2.3.2.9 The Applicants have undertaken an assessment of potential impacts to agricultural land and farm holdings. This is set out within sections 6.11.2 and 6.11.3 respectively of Volume 3, Chapter 6: Land use and recreation of the Environmental Statement (APP-104). In addition, as presented within Table 6.17 of the above, the Applicants have made a number of commitments (CoTs) to reduce potential effects on agricultural farmland. This includes CoT08, which states that "Post-construction, the working area will be reinstated to pre-existing condition as far as reasonably practical in line with the DEFRA Construction Code of Practice for the Sustainable Use of Soils on Construction Sites (PB13298), Institute of Quarrying (IQ) Good Practice Guide for Handling Soils in Mineral Workings (IQ, 2021) and British Society of Soil Science (BSSS) Working

with Soil Guidance Note on Benefitting from Soil Management in Development and Construction (BSSS, 2022).”

- 2.3.2.10 The Applicants have made a commitment (see CoTs 22, 25 and 81 of Volume 1, Annex 5.3: Commitments Register of the ES (AS-030)) to ensure soils are recorded and appropriately managed through the construction phase. These commitments are all secured by Requirement 8 within Schedules 2A and 2B of the draft Development Consent Order (AS-004). Detailed CoCP(s) will be implemented by the Applicants as approved by local planning authorities.

Negative Impact and Livestock

- 2.3.2.11 As part of the Application, the Applicants have assessed potential impacts associated with noise and vibration. The Applicants understand that there are concerns regarding the potential impact to livestock which would mainly result from noise and/or vibration impacts.

- 2.3.2.12 Noise control measures will be consistent with the recommendations of the current version of BS 5228 - Part 1: Noise and Part 2: Vibration. Statutory requirements and legislation will be fully complied with during the construction works. Measures that could be implemented to reduce the potential impacts on livestock include:

- The use of plant fitted with measures which may reduce potential noise emissions, for example those with effective silencers, noise insulation, those with acoustic enclosures, or reduced sound models;
- Activities will be designed to be undertaken with any directional noise emissions pointing away from noise-sensitive receptors, where practicable
- Use of local noise screening or site hoardings to reduce noise, where necessary and practicable
- The appointment of a site contact to whom complaints/queries about construction activity can be directed - any complaints should be investigated, and action taken where appropriate;
- Where noise complaints are received, construction noise and vibration monitoring may be undertaken at the relevant receptors to ensure the threshold values are not exceeded and notify the principal contractor if exceedances occur;
- Site personnel will be informed about the need to minimise noise as well as about the health hazards of exposure to excessive noise. Their training should include advice relating to the proper use and maintenance of tools and equipment, the positioning of machinery on site to reduce noise emissions to neighbouring residents, as well as ensuring, where possible, that unnecessary noise is avoided when carrying out manual operations and operating plant and equipment;
- No audible music or radios will be played on the construction sites; and

- Information on communication will be provided in the Communications Plan, an outline of which is provided in the Outline Communications Plan (APP-194). This includes a commitment that all necessary parties (including local residents and businesses) will be informed when construction works will take place. Information provided will include information on the general location of the activities, and the expected duration.

- 2.3.2.13 The CoCP(s) are secured by Requirement 8 of Schedules 2A and 2B of the draft DCO (AS-004). Detailed Construction Noise and Vibration Management Plan(s) will be implemented as approved by the relevant local planning authorities in consultation with the relevant stakeholders, as appropriate.
- 2.3.2.14 The mitigation measures will be actively reviewed throughout the construction phase, where necessary, to ensure that they are effective.
- 2.3.2.15 The Applicants are engaged in continued discussions and negotiations with landowners, including compensation provisions to address impacts to the existing farming business, where these cannot be avoided.

2.4 Air quality

2.4.1 Summary of matters raised

- 2.4.1.1 Some Relevant Representations raised concerns regarding the air pollution caused by an increase in traffic movement during construction. Other comments centred on the increase of dust in the air also from construction, resulting in health impacts (see section 2.19 on Human health).
- 2.4.1.2 The theme of air quality and pollution was raised by 22% of Relevant Representations.

2.4.2 Applicants' response

- 2.4.2.1 The Applicants have assessed the potential impacts on air quality in Volume 3, Chapter 9: Air quality (APP-121) and have concluded there will be no significant effects as a result of the construction, operation and maintenance and decommissioning of the Transmission Assets.
- 2.4.2.2 The data contained within Volume 3, Chapter 7: Traffic and Transport (APP-108) has informed the assessment of traffic related air quality impacts which are considered within Chapter 9: Air Quality (APP-121). The assessment of construction traffic air pollution has predicted a negligible impact.
- 2.4.2.3 Dust emissions will be controlled during the construction phase through the detailed Dust Management Plan(s), which will be developed from the outline Dust Management Plan (APP-195), which form part of the Outline Code of Construction Practice (OCoCP). The detailed CoCP(s) are secured by Requirement 8 of Schedules 2A and 2B of the draft DCO (AS-004). Detailed Dust Management Plan(s) will be implemented as

approved by the relevant local planning authorities, in consultation with the relevant statutory stakeholders, as appropriate.

2.5 Beach access

2.5.1 Summary of matters raised

2.5.1.1 Some Relevant Representations raised the issues of access to Lytham St Annes Beach during construction, duration of these closures, use of the beach car park and access to the Blackpool Light Craft Club and West Lancashire Sub Aqua Club. Representations were also made regarding the restoration of the Lytham St Annes Beach following construction and access during the operation and maintenance phase of the Transmission Assets.

2.5.1.2 The theme of beach access was raised by approximately 12% of Relevant Representations.

2.5.2 Applicants' response

Beach access during construction

2.5.2.1 For works happening in a relatively small, discrete area on or close to the beach, such as work at compounds and cofferdams, only the immediate vicinity will be closed and demarcated with fencing or other appropriate barriers ensuring access to the remainder of the beach is unaffected.

2.5.2.2 Appendix A of the Outline Public Rights of Way (PRoW) Management Plan (AS-048) provides detail regarding public access at Lytham St Annes Beach. For activities on the beach, from the direct pipe exit pits to Mean Low Water Springs (such as for direct pipe installation and offshore cable pull-in and burial), a section of the beach would need to be temporarily closed off to public access, for short durations, while certain activities are taking place. In such cases, the Applicants will implement managed crossings either to the seaward or landward side to allow users to maintain access across the beach.

2.5.2.3 Detailed management measures for how such closures at the Beach would be undertaken will be agreed with the relevant local authorities as part of the detailed PRoW Management Plan(s) secured through Requirement 8 of Schedules 2A and 2B of the draft DCO (AS-004).

2.5.2.4 The Applicants note that access to Blackpool Light Craft Club and West Lancashire Sub Aqua Club is via Starr Gate slipway. It is envisaged that access to the clubs would be maintained during the construction of the Transmission Assets.

Starr Gate slipway

2.5.2.5 The Starr Gate slipway is proposed to be used as a temporary working area to facilitate construction activities on the beach (see sections 3.10.2 and 3.14.5 in Volume 1, Chapter 3: Project Description (AS-024)). The slipway would be an access point only, with no equipment storage at this location. The Applicants' proposed use of the slipway is to launch/recover

small vessels/work boats and transport plant to the beach construction areas to the south of Starr Gate. During these activities, access would be managed to meet health and safety requirements, with access only temporarily managed when equipment is moving through Starr Gate. However, when the Transmission Assets is not actively launching / recovering vessels or moving plant, there would be no management of its usage or access by the public.

North Beach car park

- 2.5.2.6 As outlined in Section 3.14.2 of Volume 1, Chapter 3: Project Description (AS-024) Compound 1 is a welfare compound to facilitate the landfall works. The location of Compound 1 in North Beach car park is identified as Work Nos. 38A and 38B which can be seen within the Works Plans - Onshore and Offshore Part 1 of 2 (AS-014). The Applicants engaged with Fylde Borough Council in regard to the siting of the compound to ensure that potential impacts to users of North Beach car park are minimised, where practicable.
- 2.5.2.7 The restoration of land temporarily used for construction is secured by Requirement 18 of Schedules 2A & 2B of the draft development consent order (AS-004).

Beach access during operation and maintenance

- 2.5.2.8 The overall operation and maintenance strategy will be finalised once the detailed design and technical specifications of the Transmission Assets offshore and intertidal infrastructure are known. Further information on operation and maintenance requirements for the offshore export cables are set out within an outline Offshore Operations and Maintenance Plan (APP-224). This section provides a description of the reasonably foreseeable planned and unplanned operation and maintenance activities for the offshore infrastructure. Routine inspections of the offshore export cables will be undertaken to ensure the cables are buried to an adequate depth and not exposed. The integrity of the cables and cable protection systems will also be checked. It is expected that on average the offshore export cables will require up to one routine inspection per year.
- 2.5.2.9 Between the direct pipe exit pits on the beach and the subtidal area, where offshore export cable repairs and reburial may occur, access to the beach would be required. Inspection of the beach area is expected to take place on an annual basis, with a maximum of 2 persons on foot via the access between the dunes off Clifton Drive North (AP OAR_MGMC_2, Works 7A/7B, Figure 3.11, Volume 1: Figures).
- 2.5.2.10 Where cable repair and reburial may be required on the beach (within Nos 4A/4B and 5A/5B), similar plant, machinery and equipment as for construction would be required (see section 3.14.5 of Volume 1, Chapter 3: Project Description (AS-024)). Compound 2 (as per Table 3.11 of Volume 1, Chapter 3: Project Description (AS-024)) would be required to facilitate maintenance activities, and access for plant and equipment would also take place via the access between the dunes off Clifton Drive

North (AP OAR_MGMC_2 (same access as in paragraph above), Works 7A/7B, Figure 3.11, Volume 1: Figures (APP-040)). The required operational access would be up to 6 m in width. The same methodology and maximum design parameters as for construction would be used for the operational access and Compound 2, for cable reburial and repair maintenance activities.

- 2.5.2.11 Maintenance works to rebury/replace and carry out repair works on offshore export cables generally takes between two to four weeks for intertidal repair / reburial. When repair / reburial activities are required, access to Lytham St Annes beach would be the same as beach access. Maintenance works to rebury / replace and carry out repair works on offshore export cables generally takes between two to four weeks for intertidal repair / reburial. When repair / reburial activities are required, access to Lytham St Annes beach would be the same as during construction, and beach access maintained.

2.6 Blackpool Airport

2.6.1 Summary of matters raised

- 2.6.1.1 Some Relevant Representations raised concerns over impact the Transmission Assets will have on operations at Blackpool Airport, including a reduced number of flights, reduced pilot training hours, reduced investment in the Airport and the possibility of the Airport closing.
- 2.6.1.2 The theme of Blackpool Airport and the impacts the Transmission Assets will have on its operations was raised by approximately 5% of Relevant Representations.

2.6.2 Applicants' response

- 2.6.2.1 Volume 3, Chapter 11: Aviation and Radar of the Environmental Statement (APP-130) concludes that there will be no significant effects as a result of the construction, operation and maintenance and decommissioning of the Transmission Assets.
- 2.6.2.2 The Applicants have identified appropriate mitigation in the form of CoT 105 (see Volume 1, Annex 5.3: Commitments Register (AS-030)) to address any potential impacts to Blackpool Airport. The Applicants are currently, and will continue to, actively engage with Blackpool Airport (including post-consent and as a part of detailed design), to minimise the potential for operation impacts, such as flight disruption, as far as reasonably practicable. The Applicants can confirm that Blackpool Airport will not be required to close as a result of the Transmission Assets.

2.7 Carbon and greenhouses gases

- 2.7.1.1 Some Relevant Representations raised concerns about the level of greenhouse gas emissions associated with the construction of the Transmission Assets, while others raised concerns regarding the embedded carbon in the steel and concrete required to construct the Transmission Assets.

- 2.7.1.2 The theme of carbon and greenhouse gas (GHG) emissions was raised by approximately 2% of Relevant Representations.

2.7.2 Applicants' response

- 2.7.2.1 Section 1.11.2 of Volume 3, Chapter 1: Climate Change (APP-138) quantifies the level of greenhouse gas emissions (229,947 tCO₂e) associated with the construction of the Transmission Assets. This also accounts for the embedded carbon in steel and concrete and other materials required. The assessment of potential GHG emissions as a result of the Transmission Assets concluded that with the implementation of a GHG Reduction Strategy (APP-210), there would be a minor adverse effect which is not considered significant in EIA terms.

2.8 Community

2.8.1 Summary of matters raised

- 2.8.1.1 Some Relevant Representations mentioned impacts to local communities in general terms. In addition, some Relevant Representations raised concerns regarding the impacts to nearby by schools, nurseries and care homes.
- 2.8.1.2 The theme of community impact was raised by approximately 31% of Relevant Representations.

2.8.2 Applicants' response

Community impacts

- 2.8.2.1 The Applicants are committed to being a considerate neighbour during the construction, operation and maintenance, and decommissioning of the Transmission Assets.
- 2.8.2.2 In order to manage the potential impacts of construction of the Transmission Assets, the Applicants will apply the measures described in the Outline Code of Construction Practice (OCoCP) (APP-193) and the associated management plans. The CoCP(s) are secured by Requirement 8 of Schedules 2A and 2B of the draft DCO (AS-004). Detailed CoCP(s) will be implemented as approved by the relevant local planning authorities in consultation with the relevant statutory stakeholders, as appropriate.

Schools and care homes

- 2.8.2.3 The Applicants note the concerns regarding the proximity of schools and care homes to the onshore substations and onshore export cable corridor. The Applicants have undertaken a rigorous and robust route planning and site selection process in relation to the onshore infrastructure for the Transmission Assets. This included the siting of infrastructure away from sensitive receptors such as schools and care homes.

- 2.8.2.4 The nearest school is approximately 370m from the Transmission Assets Order Limits (i.e. the closest point to the school at which the onshore export cables could be installed).
- 2.8.2.5 The nearest care home is approximately 35m from the Transmission Assets Order Limits (i.e. the closest point to the care home at which the offshore export cables could be installed). However, at this location at landfall where the Applicants have made a commitment (CoT44 of Volume 1, Annex 5.3: Commitments Register of the ES (AS-030)) that the installation of the offshore export cables under Lytham St. Annes Dunes SSSI and the St. Anne's Old Links Golf Course will be undertaken by trenchless installation technique. This is secured by Requirement 8 within Schedules 2A and 2B of the draft Development Consent Order (AS-004). Section 8.11.2, of Volume 3, Chapter 8: Noise and Vibration (APP-117) has assessed the potential impacts of construction of the Transmission Assets on the care home and concluded that with appropriate mitigation secured through the DCO, the potential effects would be minor adverse, which is not significant in Environmental Impact Assessment (EIA) terms.
- 2.8.2.6 A full reasoning and justification for the selection of the onshore infrastructure, including the range of criteria used and developed throughout the iterative process is provided in Section 4.9 of Volume 1, Chapter 4: Site Selection and Consideration of Alternatives (AS-026). This is also supported by Volume 1, Annex 4.3: Selection and Refinement of the Onshore Infrastructure (APP-033).

2.9 Construction

2.9.1 Summary of matters raised

- 2.9.1.1 General concerns were raised in Representations regarding construction and the impact it would have on the local community as a result of the noise, traffic, dust and dirt that would be created.
- 2.9.1.2 Some Relevant Representations raised specific concerns including:
- Construction working hours
 - Construction duration
 - Damage to properties caused by construction activities
 - The potential for seismic activity caused by construction activities
 - Impacts on existing utilities
 - The availability of information regarding construction methods
 - Restoration following construction
- 2.9.1.3 The theme of construction was raised by approximately 75% of Relevant Representations.

2.9.2 Applicants' response

2.9.2.1 The Applicants are committed to being a considerate neighbour during the construction, operation and maintenance, and decommissioning of the Transmission Assets.

2.9.2.2 In order to manage the potential impacts of construction of the Transmission Assets, the Applicants will apply the measures described in the Outline Code of Construction Practice (OCoCP) (APP-193) and the associated management plans. Provision of the detailed CoCP(s) are secured by Requirement 8 of Schedules 2A and 2B of the draft DCO (AS-004). Detailed CoCP(s) will be implemented as approved by the relevant local planning authorities in consultation with the relevant statutory stakeholders, as appropriate.

Duration of construction

2.9.2.3 The Applicants have provided an additional technical note on construction scenarios, submitted in response to a request from the ExA within the Rule 9 letter (AS-070). Section 1.5 of the ES assessment of Construction Scenarios outlines the overarching construction scenarios considered for the Transmission Assets and includes specifics on the potential construction durations.

2.9.2.4 The maximum indicative construction duration is 66 months for sequential construction. AS-070 also explains that in any sequential construction scenario, irrespective of the gap between the first offshore windfarm assets completing construction and the second offshore wind farm transmission assets commencing construction, the total combined construction period would be for an overall period of 66 months.

Working hours

2.9.2.5 The Applicants' proposed construction working hours seek to strike a balance between protecting residential amenity and other sensitive receptors, and ensuring the projects can be delivered in a timely manner without extending the overall construction durations set out in the Project Description (AS-024). Core working hours for the construction of the intertidal and onshore works components are:

- Monday to Saturday: 07:00 - 19:00 hours; and
- up to one hour before and after core working hours for mobilisation ("mobilisation period") i.e. 06:00 to 20:00.

2.9.2.6 During the mobilisation period the Applicants will not be able to undertake noisy activities (such as piling, or other such noisy activities).

2.9.2.7 The core working hours are secured by Requirement 14 (Construction hours) of Schedules 2A and 2B of the draft DCO (AS-004).

Damage to properties caused by construction activities

2.9.2.8 Volume 1, Chapter 4: Site selection explains in detail the numerous options considered including the proximity to properties and the reasons

for the final chosen locations. The alternatives were also subject to non-statutory and statutory consultations and feedback received was taken into account in the final route. In addition, the Applicants made a commitment (CoT21 of Volume 1, Annex 5.3: Commitments Register of the ES (AS-030)) that there would be no permanent High Voltage infrastructure installed above surface within 110 m of residential properties and subsurface infrastructure within 50 m of residential properties from the onshore substations. This is secured by Requirement 4, of Schedules 2A and 2B of the draft DCO (AS-004). Therefore, the Applicants anticipate there to be no damage to properties caused by construction activities.

- 2.9.2.9 Notwithstanding the above, Article 18 of the draft DCO (AS-004) contains provisions which require protective works to be carried out to any building lying within the Order Limits.

The potential for seismic activity caused by construction activities

- 2.9.2.10 Seismic activity is defined as the vibration of ground due to the release of elastic energy.
- 2.9.2.11 The Applicants have assessed the potential impacts of construction vibration in Volume 3, Chapter 8: Noise and vibration (APP-117). Mitigation measures identified to manage the potential effects of construction vibration such as selection of lower vibration tools and equipment, implementation of task rotation and time limits on activities with high exposure levels, and passive vibration dampening methods (such as dampers, shock mounts for machines, acoustic packing, various foams) will be managed through detailed Construction Noise and Vibration Management Plan(s), which will be developed from the Outline Construction Noise and Vibration Management Plan (APP-196) and which forms part of the Outline CoCP. The detailed CoCP(s) are secured by Requirement 8 of Schedules 2A and 2B of the draft DCO (AS-004). The mitigation measures will be actively reviewed by the Principal Contractor(s) and the Applicants throughout the construction phase, where necessary, to ensure that they are effective. Detailed Construction Noise and Vibration Management Plan(s) will be implemented by the Applicants as approved by the relevant local planning authorities in consultation with the relevant statutory stakeholders, as appropriate. Methods of communication will be provided in the Communications Plan, an outline of which is provided in the outline Communications Plan (APP-194). The outline Communications Plan (APP-194) includes a commitment that all necessary parties (including local residents and businesses) will be informed when construction works will take place, including those that have the potential to generate vibration. Information provided will include information on the general location of the activities, and the expected duration.
- 2.9.2.12 Where appropriate construction noise and vibration monitoring may be undertaken at the relevant receptors to ensure the threshold values are not exceeded and notify the principal contractor if exceedances occur.

Impacts on existing utilities

- 2.9.2.13 The Applicants note the concerns regarding the crossing of existing utility infrastructure. Volume 1, Annex 3.2: Onshore Crossing Schedule presents the utility provider's assets identified across the intertidal and onshore Order Limits proposed to be crossed by the Transmission Assets. The cable crossings of utility providers will be carried out in compliance with the protective provisions and any supplementary agreements between the relevant parties. Protective provisions have been included at Schedule 10 of the draft Development Consent Order (AS-004).

The availability of information regarding construction methods

- 2.9.2.14 The Applicants would highlight that information regarding the construction of the Transmission Assets can be found in Volume 1, Chapter 3: Project Description (AS-024).

Restoration following construction

- 2.9.2.15 The onshore export cables and 400kv connection cables will be completely buried underground (draft Development Consent Order, Schedule 1 Part 1 Authorised Development) (AS-004).
- 2.9.2.16 The Outline Soil Management Plan (APP-200) sets out measures to protect soil quality and structure during construction, ensuring that the land remains viable for farming in the long term. This includes the production of an aftercare plan to be produced for agricultural areas within the Onshore Order Limits which will be subject to agreement with the Agricultural Liaison Officer and the affected landowner(s). This is secured in the DCO through Requirement 8 (Code of Construction Practice), which includes production of a Soil Management Plan in accordance with the Outline Soil Management Plan (APP-200).
- 2.9.2.17 While some land will be subject to temporary disturbance, the majority of the cable corridor will be reinstated to its pre-existing condition as far as reasonably practicable to allow agricultural use to resume following construction, which is secured by Requirement 18 (Restoration of land temporarily used for construction) of Schedules 2A and 2B to the draft Development Consent Order (AS-004).

2.10 Cumulative effects

2.10.1 Summary of matters raised

- 2.10.1.1 Some Relevant Representations raised concerns regarding the cumulative effects of the Transmission Assets alongside other developments such as proposed solar farms in the local area, the Moor Vannin Wind Farm and the potential Data Centre at Blackpool.
- 2.10.1.2 Some Relevant Representations stated that existing schemes had not been considered adequately in the cumulative assessment.

2.10.1.3 The theme of cumulative effects was raised by approximately 3% of Relevant Representations.

2.10.2 Applicants' response

2.10.2.1 Section 5.4.9 of Volume 1, Chapter 5: Environmental assessment methodology (APP-034) outlines the cumulative effects assessment methodology. Within this section, it outlines that in accordance with Advice Note 17 the CEA has taken into account developments that are:

- under construction;
- permitted application(s), but not yet implemented;
- submitted application(s) not yet determined;
- projects on the National Infrastructure Planning Portal's Programme of Projects;
- projects identified in relevant development plans; and,
- projects identified in other plans and programmes as may be relevant.

2.10.2.2 In addition to the cumulative assessment methodology, the Applicants have submitted a cumulative effects screening matrix and location plan (Volume 1, Annex 5.5 (APP-039)) which identifies all the developments which were considered by each environmental assessment topic.

2.10.2.3 The Applicants will undertake a review of the cumulative effects screening matrix and include any new developments since application by Deadline 1.

2.11 Development Consent Order

2.11.1 Summary of matters raised

2.11.1.1 Some Relevant Representations raised specific points regarding the wording of the draft Development Consent Order. Due to their specificity, these comments have been copied in full below. The same points were raised in relation to Requirements at Schedule 2B concerning Project B. Therefore, these have not been copied in full below. The responses set out below apply equally to these comments on Schedule 2B, as save for details contained in the table of divergence in the Explanatory Memorandum (AS-007), Schedules 2A and 2B are the same.

- Requirement 3 – Stages of authorised project – For clarity, a provision should be added or (3) modified so that it requires the Applicant to implement the scheme as approved by the relevant planning authority.
- Requirement 7 – Implementation and maintenance of landscaping – For clarity, a provision should be added requiring the Applicant to implement the landscaping scheme as approved under Requirement 6. 10.3

- There is no landfall construction method statement concerning works (Work Nos. 3A, 4A, 5A, 6A, 7A, 8A, 9A, 10A, 36A, 38A, 42A, 43A and 47A together with any other authorised development associated with those works and related ancillary works). A provision governing this process ought to be included to the effect that (1) no landfall construction work may commence until a method statement or equivalent has been submitted and approved by the relevant planning authority, and (2) the method statement referred to above is implemented as approved.
- Requirement 8 – Code of construction practice – (3) only concerns Project A onshore works, does this apply to Project A intertidal works? Please justify if not or otherwise amend to include Project A Intertidal works.
- Requirement 9 – Traffic and Transport – (3) only concerns Project A onshore works, does this apply to Project A intertidal works? Please justify if not or otherwise amend to include Project A Intertidal works.
- Requirement 11 – Onshore archaeology – similar projects have been prescriptive with the detail that ought to be included in the archaeological written scheme of investigation. Please include further detail on what such schemes will cover.
- Requirement 13 – European protected species onshore – (3) only concerns Project A onshore works, does this apply to Project A intertidal works? Please justify if not or otherwise amend to include Project A Intertidal works.
- Requirement 14 – Construction hours – construction hours on Saturdays are typically 0700 hours to 1300 hours, is there a justification for why the hours are 0700 hours to 1900 hours Monday to Saturday? For (3) a provision ought to be added to the effect that such approved works must be completed within the agreed time. The outline Code of Construction Practice at paragraph 1.6.2.1 provides that no core working will be undertaken on Sundays or Bank Holidays, except in exceptional circumstances. There is no inclusion or reference to such exceptional circumstances in Requirement 14. For the avoidance of ambiguity please detail what situations may give rise to such exceptions or if not required remove such wording as this carries the risk of establishing conflicting exceptions.
- Requirement 15 – Fencing and other means of enclosure - For clarity, a provision should be added requiring the Applicant to complete the fencing and other means of enclosure works as approved by the relevant planning authority.
- Requirement 16 – Restoration of land used temporarily for construction – as drafted, there is no hard timescale for the Applicant to carry out the restorative works which carries the risk of potential slow progress. We suggest that any restorative works are completed within 12 months of completion of the relevant stage of

the Project A onshore works and Project A intertidal works, or such other period as the relevant planning authority may approve.

- Requirement 18 – Control of noise during operational stage – while this requirement makes reference to the noise management plan, there is no specific sound level (in decibels) expressly stated which must not be breached at any time. This detail ought to be included given its significance.

2.11.1.2 The theme of the draft Development Consent Order was raised by approximately 3% of Relevant Representations.

2.11.2 Applicants' response

Requirement 3

2.11.2.1 The Applicants have included the requirements for the staging of the works to be undertaken in accordance with the staging plan agreed with the relevant local planning authorities in Schedule 2A of the draft DCO (AS-004). Please refer to Requirement 3(3) which states "(3) The construction of the Project A onshore works and Project A intertidal works must follow the details provided under sub-paragraph (2)."

2.11.2.2 The same applies in relation to Project B. See Requirement 3(3) of Schedule 2B of the draft DCO (AS-004).

Requirement 7

2.11.2.3 The Applicants refer to requirement 7 in Schedule 2A of the draft DCO (AS-004), noting a provision aligning with the request to include a provision for the landscaping to be implements as per the landscaping scheme approved in Requirement 6 has already been provided:

2.11.2.4 "7(1) All landscaping works must be carried out in accordance with the landscaping schemes approved under requirement 6 provision of landscaping".

2.11.2.5 The same applies in relation to Project B. See Requirement 7 of Schedule 2B of the draft DCO (AS-004).

Landfall Construction Method Statement

2.11.2.6 The Applicants do not consider it is necessary to include additional drafting in the draft Development Consent Order (DCO) (AS-004) providing for a landfall construction method statement concerning the Work Nos. noted as the details of the construction methods are set out in Volume 1, Chapter 3: Project description (AS-024). Adherence to the scope of works set out in that chapter is secured through the wording in the DCO that requires the project to be in accordance with the environmental statement. In addition, there are already existing provisions within the draft DCO (AS-004) to govern construction processes at landfall. These are as follows:

- No licensed activities under the Marine Licence 1: Morgan Offshore Wind Project Transmission Assets, which would include Work Nos.

3A and 4A, may commence until a relevant construction method statement has been prepared in accordance with Condition 18(1)(e) of Schedule 14 of the draft DCO (AS-004). Condition 19(3) requires that the licensed activities must then be carried out in accordance with that construction method statement.

- Similarly, Project A onshore works and Project A intertidal works (which covers Work Nos 5A-54A) cannot commence until for each stage of the works a detailed code of construction practice has been prepared and approved by the relevant planning authority. This is set out in Requirement 8(1) of Schedule 2A, and in accordance with Requirement 8(2), each detailed CoCP and supporting management plan as relevant must be prepared in accordance with the outline plan submitted at application (APP-193 – APP-207). The details secured through the CoCP(s) ensure they key aspects of the Applicants' approach to construction are approved by the relevant local authority in advance. Requirement 8(3) requires those works to be carried out in accordance with the plan approved under Requirement 8(2).

2.11.2.7 The same applies in relation to Project B. See the same provisions above noted in Schedule 2B and Schedule 15 of the draft DCO (AS-004).

Requirement 8

2.11.2.8 The Applicants agree that sub-paragraph (3) should also refer to Project A intertidal works. An updated draft DCO will be provided at Deadline 1.

2.11.2.9 The same applies in relation to Project B.

Requirement 9

2.11.2.10 There are no highway or streets which lead directly to the Project A intertidal works and Requirement 9 is therefore only intended to apply to the Project A onshore works.

2.11.2.11 The same applies in relation to Project B. See Requirement 9 of Schedule 2B of the draft DCO (AS-004).

Requirement 11

2.11.2.12 The Applicants note this comment that prescriptive detail regarding the archaeological written scheme of investigation (WSI) should be included, however, the requirement provides for the detailed WSI(s) to be submitted in accordance with the outline onshore WSI (APP-214). This outline plan already sets out the details and requirements for the detailed WSI(s) and will form part of the certified documents accompanying any Development Consent Order as made.

2.11.2.13 The same applies in relation to Project B. See Requirement 11 of Schedule 2B of the draft DCO (AS-004).

Requirement 13

- 2.11.2.14 The Applicants confirm that they have not identified a need for EPS licences within the intertidal areas. Therefore Requirement 13(3) of Schedule 2A correctly refers only to Project A onshore works.
- 2.11.2.15 The same applies in relation to Project B. Please see Requirement 13(3) of Schedule 2B of the draft DCO (AS-004).

Requirement 14

- 2.11.2.16 The Applicants' proposed construction working hours seek to strike a balance between protecting residential amenity and other sensitive receptors, and ensuring the projects can be delivered in a timely manner without extending the overall construction durations set out in the Project Description (AS-024).
- 2.11.2.17 The core working hours are secured by Requirement 14 (Construction hours) of Schedule 2A to the draft DCO (AS-004).
- 2.11.2.18 The circumstances in which core working will be undertaken outside of core working hours, including on Sundays or Bank Holidays, are those specified in Requirement 14(2) of Schedule 2A to the draft DCO (AS-004). There are no other additional 'exceptional circumstances' anticipated by the projects.
- 2.11.2.19 The same applies in relation to Project B. Please see Requirement 14 of Schedule 2B to the draft DCO (AS-004).
- 2.11.2.20 The Applicants do not consider any amendments are required or necessary in respect of Requirement 14 in either Schedule 2A or 2B of the draft DCO (AS-004).

Requirement 15

- 2.11.2.21 The Applicants note this comment and an updated draft DCO will be provided at Deadline 1 which reflects the request for fencing and other means of enclosure to be approved by the relevant planning authority.
- 2.11.2.22 The same applies to Project B.

Requirement 16

- 2.11.2.23 The Applicants will provide an updated draft DCO at Deadline 1, which will reflect the change requested of a 12 month timeline for completion of restorative works.
- 2.11.2.24 The same applies to Project B.

Requirement 18

- 2.11.2.25 The Applicants maintain that Requirement 18 provides sufficient comfort that the Applicants will control operational noise. Requirement 18 requires an operational noise management plan (NMP) to be approved by the relevant planning authority. That planning authority will therefore have appropriate levels of control over the Applicant's ability to

commence operations, noting the Requirement 18(3) requires the Applicants to implement the NMP as approved.

2.12 Ecology

2.12.1 Summary of matters raised

- 2.12.1.1 Some Relevant Representations were concerned about negative impacts on biodiversity. Concerns raised related to a wide range of wildlife in the local area and the loss of habitat, noting that many species in the area are endangered and protected.
- 2.12.1.2 The main themes raised covered the destruction of habitats, impacts to wildlife including, but not limited to, protected species such as great crested newts, sand lizards, pink-footed geese and whooper swans and impact to designated sites including Sites of Special Scientific Interest (SSSI) and Biological Heritage Sites.
- 2.12.1.3 Some Relevant Representations queried whether the Applicants' plans to provide Biodiversity Net Gain were adequate and suitable for the area.
- 2.12.1.4 The theme of ecological impacts was raised by approximately 47% of Relevant Representations.

2.12.2 Applicants' response

- 2.12.2.1 The Applicants have assessed the potential impacts to onshore ecology and nature conservation in Volume 3, Chapter 3: Onshore ecology and nature conservation (APP-075). Mitigation measures to reduce impacts to habitats such as the development of detailed Ecological Management Plan(s) are secured through the draft DCO (AS-004). These must be developed in accordance with the outline Ecological Management Plan (APP-212) as secured by Requirement 12 of Schedules 2A and 2B of the draft DCO (AS-004). This is also set out in CoT104 of Volume 1, Annex 5.3: Commitments register of the ES (document reference APP-037).

Great Crested Newts

- 2.12.2.2 Section 3.11.12 of Volume 3, Chapter 6: Onshore ecology and nature conservation (APP-075), provides an assessment on the potential impacts to Great Crested Newts due to the construction of the Transmission Assets. The assessment concluded that the potential impacts would result in up to a minor adverse effect which is not considered significant in EIA terms. The Applicants had also made a commitment (CoT92 of Volume 1, Annex 5.3: Commitments Register of the ES (AS-030)) to contribute to Lancashire's District Level Licencing (DLL) Scheme. This is secured by Requirement 12 of 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 the local planning authorities.

Sand lizards

- 2.12.2.3 As explained in paragraph 3.11.13.8 of Volume 3, Chapter 3: Onshore ecology and nature conservation (APP-075), the main source of disturbance to sand lizard populations is the piling associated with the onshore export cable exit pits. Lytham St Annes Dunes SSSI will be crossed utilising trenchless techniques the exit pit of which will be situated 100 m seaward of the western boundary of Lytham St Annes SSSI (as set out in CoT44, secured by Requirement 8 of Schedules 2A & 2B, of the draft DCO (AS-004)). Section 3.11.13 of Volume 3, Chapter 3: Onshore ecology and nature conservation (APP-075) assesses the potential impact on sand lizards as a result of the Transmission Assets. The assessments concluded that there would be at most a minor adverse impact on sand lizards which is not considered significant in EIA terms.

Pink-footed geese and whooper swans

- 2.12.2.4 Volume 3, Chapter 4: Onshore and intertidal ornithology (APP-090) assess the potential impact to Pink-Footed Geese and Whooper Swans as a result of the Transmission Assets. The assessments concluded that there would be at most a minor adverse impact which is not considered significant in EIA terms. In addition, the Applicants have made a commitment (CoT107 of Volume 1, Annex 5.3: Commitments Register of the ES (AS-030)) that where construction activities are undertaken along the onshore export cable corridor within areas of Functionally Linked Land (Lytham Moss Biological Heritage Site) in proximity to Higher Ballam and Lower Ballam, 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). The feeding may comprise retention of spoiled crop and/or the import of additional feed, as appropriate. In addition, scrapes will be provided for terrestrial wader features. Further information regarding the mitigation area can be found in Appendix B of the Outline Ecological Management Plan (APP-212). 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 local planning authorities.

Sites of Special Scientific Interest

- 2.12.2.5 The avoidance of open cut trenching through the Lytham St Annes Dunes Site of Special Scientific Interest (SSSI) will ensure there will be no direct loss of vegetation or habitats and the protected features of the sand dunes will be preserved. The commitment to trenchless installation techniques is set out in the CoT44 (Volume 1, Annex 5.3: Commitments Register of the ES (AS-030)) and is secured by Requirement 8 of Schedules 2A and 2B of the draft Development Consent Order (AS-004). SSSIs which are in close proximity to the Transmission Assets, but have been avoided as part of the site selection include:
- Newton Marsh SSSI – approximately 0.02km from the Transmission Assets Order Limits

- Lytham Coastal Changes SSSI – approximately 0.12km from the Transmission Assets Order Limits
- Marton Mere SSSI – approximately 3.78km from the Transmission Assets Order Limits

2.12.2.6 A full reasoning and justification for the route planning and site selection for the onshore infrastructure (including the onshore export cable corridors and onshore substations) is provided in Section 4.9 of Volume 1, Chapter 4: Site Selection and Consideration of Alternatives (AS-026). This is also supported by Volume 1, Annex 4.3: Selection and Refinement of the Onshore Infrastructure (APP-033)

Biological Heritage Sites

2.12.2.7 Potential impacts to Biological Heritage Sites (BHS) as a result of the Transmission Assets are assessed within Section 3.11.6, of Volume 3, Chapter 3: Onshore Ecology and Nature Conservation (APP-075). The assessment concluded that there would be one potential significant effect on the temporary habitat loss at Mill Brook BHS. To mitigate for potential temporary habitat loss associated with Mill Brook Valley BHS, the Applicants have made a commitment (CoT126 of Volume 1, Annex 5.3: Commitments Register of the ES (AS-030)) that temporary construction compounds will be micro-sited to avoid the site wherever reasonably practicable. This is secured by Requirement 8 of Schedules 2A and 2B of the draft Development Consent Order (AS-004).

2.12.2.8 Whilst there is currently no legal requirement to provide for biodiversity net gain with applications for development consent under the Planning Act 2008, the Applicants are proposing to make a voluntary commitment to achieve an overall biodiversity benefit for areas of permanent habitat loss associated with the permanent above-ground infrastructure of the Transmission Assets in accordance with National Policy Statements (NPS) EN-1 and EN-5. Paragraph 2.6.6 of EN-5 states “where the use of land at a specific location is required to facilitate the development by providing for mitigation, landscape enhancement and biodiversity net gain, an applicant may, as part of its application to the Secretary of State, seek the compulsory acquisition of that land, or rights over that land”. Whilst these biodiversity benefit measures are not legally required and are not required in order to mitigate any environmental impacts identified through the EIA, the Applicants are committed to delivering those measures where they are able to acquire the land and rights to do so. The Applicants have put careful consideration into the biodiversity benefit measures put forwards and considers these are reasonable and proportionate. Further details can be found within the Onshore Biodiversity Benefit Statement which was submitted as part of the Application (AS-054).

2.13 Electromagnetic Fields (EMF)

2.13.1 Summary of matters raised

- 2.13.1.1 Some Relevant Representations noted the impact of electromagnetic field (EMF) and raised concerns regarding how this may impact peoples' health.
- 2.13.1.2 The theme of Electromagnetic Fields was raised by approximately 4% of Relevant Representations.

2.13.2 Applicants' response

- 2.13.2.1 EMFs occur naturally as well as being produced wherever electricity is generated, transmitted or used. The UK Government has adopted the 1998 Guidelines for Limiting Exposure to time-varying electric, magnetic, and electromagnetic fields (up to 300 GHz) produced by the International Commission on Non-Ionising Radiation Protection (ICNIRP). The ICNIRP guidance provides occupational and public exposure limits for EMF.
- 2.13.2.2 All the electrical infrastructure associated with the Transmission Assets will be designed to comply with latest and 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.
- 2.13.2.3 With regard to potential EMF impacts, the Transmission Assets 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 Transmission Assets as detailed in CoT106 of Volume 1, Annex 5.3: Commitments register of the ES (document reference APP-037)). 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. Volume 1, Annex 5.1 of the Environmental Statement (ES) (document reference APP-035) has had regard to the risk perceptions associated with EMFs of the Transmission Assets on the local area and this is presented in section 1.11.9 of the Annex. Please refer to the EMF Compliance Statement for further information (Volume 1 Annex 3.4 of the ES, (document reference APP-029).

2.14 Environment

2.14.1 Summary of matters raised

- 2.14.1.1 Some Relevant Representations raised general concerns regarding impacts to the environment.
- 2.14.1.2 The theme of environmental impacts was raised by approximately 75% of Relevant Representations.

2.14.2 Applicants' response

- 2.14.2.1 The Applicants are committed to developing the Transmission Assets in a way that is sensitive to the environment, minimising potential effects wherever possible. Impacts which have the potential to give rise to likely significant effects have been carefully assessed and appropriate mitigation identified throughout the Environmental Statement.

2.15 Equestrian

2.15.1 Summary of matters raised

- 2.15.1.1 Some Relevant Representations raised concerns regarding impacts to horses during construction due to increased noise and pollution; reduced grazing; and reduced exercise opportunities due to closure of Bridleways.
- 2.15.1.2 Some Relevant Representation were concerned that local equestrian businesses including the Wrea Green Equitation Centre would need to close as a result of the Transmission Assets.
- 2.15.1.3 The theme of equestrian impacts was raised by approximately 7% of Relevant Representations.

2.15.2 Applicants' response

Impacts to horses

- 2.15.2.1 The Applicants are committed to developing the Morgan Offshore Wind Project and Morecambe Offshore Windfarm in a way that is sensitive to the environment, minimising potential effects to the local community and specific receptors, wherever possible.
- 2.15.2.2 Noise control measures will be consistent with the recommendations of the current version of BS 5228 - Part 1: Noise and Part 2: Vibration. Statutory requirements and legislation will be fully complied with during the construction works. Measures that are specific to the potential noise impacts on horses include:
- The use of plant fitted with measures which may reduce potential noise emissions, for example those with effective silencers, noise insulation, those with acoustic enclosures, or reduced sound models;
 - Activities will be designed to be undertaken with any directional noise emissions pointing away from noise-sensitive receptors, where practicable
 - Use of local noise screening or site hoardings will be used to reduce noise, where necessary and practicable
 - The appointment of a site contact to whom complaints/queries about construction activity can be directed - any complaints should be investigated, and action taken where appropriate;

- Where noise complaints are received, construction noise and vibration monitoring may be undertaken at the relevant receptors to ensure the threshold values are not exceeded and notify the principal contractor if exceedances occur;
- Site personnel will be informed about the need to minimise noise as well as about the health hazards of exposure to excessive noise. Their training should include advice relating to the proper use and maintenance of tools and equipment, the positioning of machinery on site to reduce noise emissions to neighbouring residents, as well as ensuring, where possible, that unnecessary noise is avoided when carrying out manual operations and operating plant and equipment;
- No audible music or radios will be played on the construction sites; and
- Information on communication will be provided in the Communications Plan, an outline of which is provided in the Outline Communications Plan (APP-194). This includes a commitment that all necessary parties (including local residents and businesses) will be informed when construction works will take place. Information provided will include information on the general location of the activities, and the expected duration.

2.15.2.3 The CoCP(s) are secured by Requirement 8 of Schedules 2A and 2B of the draft DCO (AS-004). Detailed Construction Noise and Vibration Management Plan(s) will be implemented as approved by the relevant local planning authorities in consultation with the relevant stakeholders, as appropriate.

2.15.2.4 The mitigation measures will be actively reviewed throughout the construction phase, where necessary, to ensure that they are effective. Where land is temporarily taken for the construction of the Transmission Assets and there are losses as a direct result which cannot be mitigated, compensation is available in accordance with the Compensation Code. The Applicants will continue to engage with landowners and occupiers to discuss the impacts on horses to ensure mitigation measures can be put in place where practicable. The Applicants will work with landowners and occupiers to identify and agree suitable crossing points to provide access to any severed land, wherever possible, during construction. As set out in the Code of Construction Practice, an Agricultural Liaison Officer will be appointed to lead these discussions (APP-193).

2.15.2.5 The Applicants will manage and maintain access to the existing Public Rights of Way (PRoW) network during construction (CoT91 of Volume 1, Annex 5.3: Commitments Register of the ES). No PRoW will be permanently stopped up as a result of the construction, operation and maintenance or decommissioning of the Transmission Assets.

2.15.2.6 To manage the potential impacts of construction, the Applicants will apply the measures described in the Outline PRoW Plan (AS-048). For the majority of the PRoW intersected by the Onshore Order Limits, it is proposed that these will remain open with appropriate signage (i.e. managed crossings) to warn of the presence of construction vehicles,

and to warn of the presence of walkers, cyclists and horse riders. These managed crossings of PRow will be fenced off with gated crossing points and temporary site fencing to prevent the public from accessing the PRow, when access would need to be managed. Where there is a specific requirement to maintain the access, a suitable route will be clearly marked out to aid safe passage. Where such crossings are installed, a gap will be left in the topsoil bunds after the topsoil has been stripped within the onshore export cable corridors.

- 2.15.2.7 The measures to be implemented as part of the PRow Management Strategy 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. The detailed Public Right of Way Management Plan(s), which will be developed in accordance with the outline Public Rights of Way Management Plan (AS-048), and which forms part of the detailed Code of Construction Practice(s). The detailed CoCP(s) are secured by Requirement 8 of Schedules 2A and 2B of the draft DCO (AS-004). Detailed Public Right of Way Plan(s) will be implemented as approved by the relevant local planning authority.

Wrea Green Equitation Centre

- 2.15.2.8 The Applicants are committed to developing the Morgan Offshore Wind Project and Morecambe Offshore Windfarm in a way that is sensitive to the environment, minimising potential effects to the local community and specific receptors, wherever possible.
- 2.15.2.9 As part of the application, the Applicants have assessed potential impacts associated with noise and vibration, socio-economics and land use and recreation. The outcomes of the assessment for each of these topic areas has been assessed and are reported in the Environmental Statement.
- 2.15.2.10 Section 6.11.4 of Volume 3, Chapter 6: Land Use and Recreation (APP-104) has assessed the potential impact on recreational resources (including Wrea Green Equitation Centre) and concluded that with appropriate mitigation secured through the DCO, the potential effects would be minor adverse, which is not significant in Environmental Impact Assessment (EIA) terms.
- 2.15.2.11 Based on noise and vibration modelling contained within Volume 3, Annex 8.2: Construction noise and vibration of the Environmental Statement (APP-119), low magnitude impacts are predicted at Wrea Green Equitation Centre (in EIA terms), based on the model of noise generating activity (e.g. establishing access and temporary construction compounds joint bay excavation, construction or backfill). The Applicants are confident that with the application of mitigation within Section 1.2 of the outline Noise and Vibration Management Plan, that potential construction impacts to the equitation school can be appropriately managed via the suite of noise attenuation techniques available (APP-196, which form part of the Outline Code of Construction Practice (CoCP) (see CoT35, of Volume 1, Annex 5.3: Commitments Register) (AS-030).

- 2.15.2.12 Noise control measures will be consistent with the recommendations of the current version of BS 5228 - Part 1: Noise and Part 2: Vibration. Statutory requirements and legislation will be fully complied with during the construction works. Measures that are specific to the potential impacts on the Wrea Green Equitation Centre include:
- The use of plant fitted with measures which may reduce potential noise emissions, for example those with effective silencers, noise insulation, those with acoustic enclosures, or reduced sound models;
 - Activities will be designed to be undertaken with any directional noise emissions pointing away from noise-sensitive receptors, where practicable
 - Use of local noise screening or site hoardings will be used to reduce noise, where necessary and practicable
 - The appointment of a site contact to whom complaints/queries about construction activity can be directed - any complaints should be investigated, and action taken where appropriate;
 - Where noise complaints are received, construction noise and vibration monitoring may be undertaken at the relevant receptors to ensure the threshold values are not exceeded and notify the principal contractor if exceedances occur;
 - Site personnel will be informed about the need to minimise noise as well as about the health hazards of exposure to excessive noise. Their training should include advice relating to the proper use and maintenance of tools and equipment, the positioning of machinery on site to reduce noise emissions to neighbouring residents, as well as ensuring, where possible, that unnecessary noise is avoided when carrying out manual operations and operating plant and equipment;
 - No audible music or radios will be played on the construction sites; and
 - Information on communication will be provided in the Communications Plan, an outline of which is provided in the Outline Communications Plan (APP-194). This includes a commitment that all necessary parties (including local residents and businesses, such as Wrea Green Equitation Centre) will be informed when construction works will take place. Information provided will include information on the general location of the activities, and the expected duration.
- 2.15.2.13 The CoCP(s) are secured by Requirement 8 of Schedules 2A and 2B of the draft DCO (AS-004). Detailed Construction Noise and Vibration Management Plan(s) will be implemented as approved by the relevant local planning authorities in consultation with the relevant stakeholders, as appropriate.
- 2.15.2.14 The mitigation measures will be actively reviewed throughout the construction phase, where necessary, to ensure that they are effective.

The Applicants believe that the Wrea Green Equitation Centre will not need to close in response to the proposals associated with the Transmission Assets.

2.16 Flooding

2.16.1 Summary of matters raised

- 2.16.1.1 Some Relevant Representations expressed a concern that the Transmission Assets would increase flood risk in the area, highlighting issues such as increased surface water flow and disruption to drainage channels. Some attributed this to the use of concrete in underground activities. There were statements that the area is prone to flooding and that there has been increased flooding in recent years following the completion of nearby housing developments.
- 2.16.1.2 Some Relevant Representations raised concerns regarding a negative impact on watercourses, including runoff carrying pollutants into watercourses and construction leading to an increase in litter in watercourses.
- 2.16.1.3 The theme of flooding was raised by approximately 28% of Relevant Representations.
- 2.16.1.4 Information on coastal flooding can be found in section 2.30.

2.16.2 Applicants' response

Flood risk

- 2.16.2.1 The assessment of the potential for increased flood risk arising from additional surface water runoff is presented within section 2.11.4 of Volume 3, Chapter 2: Hydrology and flood risk of the ES (document reference APP-070). Mitigation measures are discussed within Table 2.19 of Volume 3, Chapter 2: Hydrology and flood risk of the ES (document reference APP-070). An Outline Code of Construction Practice (document reference APP-193) has been prepared and submitted with the application for development consent. The Outline CoCP includes measures in relation to flood risk during the construction phase. (which is secured via Requirement 8 of Schedules 2A and 2B of the draft DCO (AS-004)). Further, the Transmission Assets have committed (see CoT11 of Volume 1, Annex 5.3: Commitments register of the ES (document reference APP-037)) to preparation of detailed Operational Drainage Management Plans which are to be developed in accordance with the outline Operational Drainage Management Plan, the latest relevant guidance and in consultation with the Environment Agency and the Lead Local Flood Authority (being Lancashire County Council). This is secured via Requirement 20 of Schedules 2A and 2B of the draft DCO (AS-004). The detailed plans will include measures to ensure that existing land drainage is reinstated and/or maintained.

Waste management

- 2.16.2.2 The Applicants have made a commitment (CoT26 of Volume 1, Annex 5.3: Commitments Register of the ES (AS-030)) to prepare detailed Site Waste Management Plan(s) (SWMPs) in accordance with the Outline Site Waste Management Plan (APP-199) and Outline Code of Construction Practice (APP-193) prepared and submitted with the application for development consent, and in consideration of the latest relevant available guidance. This is secured by Requirement 8 of Schedules 2A and 2B of the draft DCO (AS-004) as approved by the relevant planning authority in consultation with Natural England or the Environment Agency, as appropriate.
- 2.16.2.3 The outline Site Waste Management Plan states that construction waste generated from the development of the Transmission Assets will be managed according to the principles of the waste hierarchy. The waste hierarchy ranks waste management options according to what is best for the environment. It gives top place to waste prevention. When waste has been generated, priority is given to preparing it for reuse, then recycling, then recovery, and last of all disposal.
- 2.16.2.4 All waste that cannot be reused, recycled or recovered will be collected by the licensed waste management contractor and disposed of at a permitted site suitable for the type of waste.
- 2.16.2.5 Regular inspections of the onshore construction works will be undertaken to ensure the continued compliance of site operations with the provisions of the detailed Site Waste Management Plan(s) and control measures outlined in relevant method statements.

2.17 Green Belt

2.17.1 Summary of matters raised

- 2.17.1.1 Some Relevant Representations raised objections to development taking place on Green Belt land. Some Representations argued that the Transmission Assets do not meet the threshold of very special circumstances required to allow development on Green Belt land.
- 2.17.1.2 The theme of Green Belt and was raised by approximately 41% of Relevant Representations.

2.17.2 Applicants' response on green belt

- 2.17.2.1 The Applicants followed an iterative route planning and site selection process that led to the identification of the landfall, onshore export cable corridor route and onshore substation sites. This process, outlined in ES Volume 1, Chapter 4: Site Selection and Consideration of Alternatives (AS-026) and ES Volume 1, Annex 4.3: Selection and Refinement of the Onshore Infrastructure (AS-028), progressed through four stages, incorporating feedback at each stage and assessing non-Green Belt alternatives, where feasible. However, given the spatial requirements for the transmission infrastructure and the need to connect to the national

electricity transmission network at Penwortham, it was not possible to avoid Green Belt land.

- 2.17.2.2 While the onshore substations constitute new buildings, their siting and associated landscape mitigation have been designed to minimise landscape and visual impacts, as much as possible, as set out in sections 4.4 to 4.9 of ES Volume 1, Chapter 4: Site selection and consideration of alternatives (AS-026) and ES Volume 1, Annex 4.3: Selection and Refinement of the Onshore Infrastructure (AS-029). As an integral part of a nationally significant low carbon infrastructure project, the Transmission Assets are considered to be critical national priority (CNP) infrastructure, as set out in paragraph 4.2.4 of NPS EN-1.4.2.5 of NPS EN-1. The Applicants have demonstrated in section 6 of the Planning Statement (APP-233) that the significant benefits of the Transmission Assets, as a result of energy transmission from renewable sources, mean that even if the Transmission Assets were not considered to be CNP, very special circumstances exist which outweigh any harm to Green Belt.

2.18 Heritage and archaeology

2.18.1 Summary of matters raised

- 2.18.1.1 Some Relevant Representations noted areas of historic importance nearby to the Proposed Development and stated that these would be negatively impacted. Specific attention was given to the Quaker Wood Burial site.
- 2.18.1.2 The theme of heritage and archaeology was raised by approximately 6% of Relevant Representations.

2.18.2 Applicants' response

- 2.18.2.1 An assessment of impacts which have the potential to give rise to likely significant effects in relation to designated heritage assets, including listed buildings, as a result of the change within their settings is presented in ES Volume 3, Annex 5.5: Settings assessment (APP-102). This assessment was undertaken in accordance with relevant guidance, specifically the guidance in 'The Setting of Heritage Assets' (Historic England, 2017). It follows the staged approach set out in that guidance document, in which heritage assets that could be affected by a proposed development are initially identified following by a review of the setting of the heritage asset and the contribution that the setting makes to the significance of the heritage asset. No significant effects were identified in respect of any designated heritage asset.
- 2.18.2.2 In addition, the Applicants have also made a commitment (CoT40 of Volume 1, Annex 5.3: Commitments Register of the ES (AS-030)) to develop an Onshore and Intertidal Written Scheme of Investigation(s) (WSI) to be developed in line with the Outline Onshore and Intertidal WSI. The Onshore and Intertidal WSI(s) will provide details on the surveys and archaeological mitigation in advance of each stage of the Transmission Assets any ground breaking works and during construction. This is secured by Requirement 11 of Schedules 2A and 2B of the draft DCO

(AS-004). Detailed Onshore and Intertidal WSIs will be implemented by the Applicants as approved by Lancashire County Council in consultation with Historic England, as appropriate.

Quaker Wood Burial site

- 2.18.2.3 The Applicants refer to information regarding the potential Quaker burial grounds in the vicinity of Quakers Wood provided in paragraphs 1.5.8.9 to 1.5.8.12 of ES Volume 3, Annex 5.1: Historic environment desk-based assessment (APP-097). The locations of these potential burial grounds are indicated on Figure G(10) in Appendix G of ES Volume 3, Annex 5.1: Historic environment desk-based assessment (APP-097). This figure shows the relevant area as depicted on the 1838 Freckleton Tithe Map, and the potential burial grounds are represented by the plots numbered as 49, 76 and 126 on this map.
- 2.18.2.4 The onshore export cable corridor in this area has been aligned, as part of the route planning and site selection process, such that it passes to the north of the potential Quaker burial grounds within plots 76 and 126 as indicated on the 1838 Freckleton Tithe Map. Archaeological geophysical survey has been undertaken within the onshore export cable corridor in the land to the north of these potential Quaker burial grounds. The results of this geophysical survey are presented within Figures 28 and 29 in ES Volume 3, Annex 5.2: Onshore archaeological geophysical survey report – Part 1 of 2 (APP-098). The relevant area on these figures is Area 90. The geophysical survey did not identify any anomalies indicative of the presence of graves. A further programme of archaeological investigation will take place here ahead of the commencement of construction. This will be part of the proposed programme of archaeological work set out in the Outline Onshore and Intertidal Written Scheme of Investigation (APP-214). If any burials or other archaeological features are identified here, a programme of further archaeological work will be agreed and implemented in accordance with the procedures set out in the Outline Onshore and Intertidal Written Scheme of Investigation (APP-214).
- 2.18.2.5 The land within the onshore export cable corridor and also within the potential Quaker burial ground within plot 49 as indicated on the 1838 Freckleton Tithe Map has also been subject to archaeological geophysical survey. The results of this geophysical survey are presented within Figures 28 and 29 in ES Volume 3, Annex 5.2: Onshore archaeological geophysical survey report – Part 1 of 2 (APP-098). The relevant area on these figures is Area 89. The geophysical survey did not identify any anomalies indicative of the presence of graves. However, the onshore export cables will be installed within this area through the use of trenchless techniques therefore the potential Quaker burial ground within plot 49 as indicated on the 1838 Freckleton Tithe Map will not be disturbed. This is indicated on Sheet 22 in ES Volume 1, Annex 3.2: Onshore crossing schedule Part 2 of 2 (APP-027) where plot 49 as indicated on the 1838 Freckleton Tithe Map is the area shown as that part of the indicative trenchless installation area at the western edge of the sheet and to the north of Lower Lane.

- 2.18.2.6 Potential impacts on the potential Quaker burial grounds in the vicinity of Quakers Wood have therefore been avoided either through the design of the cable route alignment (plots 76 and 126 as indicated on the 1838 Freckleton Tithe Map) or through the use of trenchless technology for cable construction (plot 49 and 126 as indicated on the 1838 Freckleton Tithe Map). Archaeological geophysical survey has been undertaken within the onshore export cable corridor in this area, with further archaeological investigations also planned.
- 2.18.2.7 Should unexpected human remains be encountered, Article 19 of Part 4 of the draft Development Consent Order (DCO) (AS-004) includes the procedure for dealing with the removal of human remains. For human remains considered to have been interred more than 100 years ago, the procedure for dealing with these is set out in paragraphs 1.5.3.10 to 1.5.3.12 of the Outline Onshore and Intertidal Written Scheme of Investigation (APP-214). This is secured via Requirement 11 of the draft DCO (AS-004).

2.19 Human health

2.19.1 Summary of matters raised

- 2.19.1.1 Some Relevant Representations stated their concern regarding the impact of the Transmission Assets on residents' mental health and wellbeing. The impacts on physical health were also raised, including the exacerbation of existing conditions such as asthma due to construction.
- 2.19.1.2 The theme of human health including mental health was raised by approximately 27% of Relevant Representations.

2.19.2 Applicants' response

- 2.19.2.1 An assessment considering how the Transmission Assets may affect different aspects of the environment that influence population health has been undertaken and reported at Volume 1 Annex 5.1: Human health (APP-035). This includes changes to the social, economic and bio-physical environment and is informed by the results of other assessments as reported in the ES, including those relating to air quality (APP-121), water quality, soil quality and contaminated land (APP-068), noise exposure (APP-117), transport nature and flow rate (APP-108), open space, leisure and play (APP-104) and socio-economic factors (APP-141). This assessment utilises the World Health Organisation definition of health and wellbeing, which includes mental wellbeing. Any potential impacts are assessed to be not significant in Environmental Impact Assessment terms, and can be appropriately addressed through the sharing of relevant information with the public during construction (as set out in the Outline Communications Plan (APP-194)) and the Applicants' adherence to health protection standards as set out in the Outline Code of Construction Practice (APP-193).
- 2.19.2.2 Detailed Communication Plan(s), which will be developed from the Outline Communication Plan (APP-194) and, which forms part of the CoCP(s). The CoCP(s) are secured by Requirement 8 of Schedules 2A

and 2B of the draft DCO (AS-004). Detailed Communication Plan(s) will be implemented by the Applicants as approved by the relevant local planning authorities in consultation with the relevant statutory stakeholders, as appropriate.

- 2.19.2.3 The Applicants recognise the concerns raised about proximity to the electrical infrastructure (including buried export cables and onshore substations) and the potential effect on mental health of those living in proximity to the works.
- 2.19.2.4 The Applicants have assessed how the Transmission Assets could affect different aspects of the environment that influence population health and this is reported at Volume 1, Annex 5.1: Human health (APP-035). This includes changes to the social, economic and bio-physical environment and is informed by the results of other assessments as reported in the ES. This assessment utilises the World Health Organisation definition of health and wellbeing, which includes mental wellbeing. Any effects are assessed to be not significant and will be appropriately addressed through the sharing of relevant information with the public as set out in the Outline Communications Plan (APP-194) and the Applicants' adherence to health protection standards as set out in the Code of Construction Practice (APP-193). Detailed Communication Plan(s), which will be developed from the Outline Communication Plan (APP-194) and, which forms part of the CoCP(s). The detailed CoCP(s) are secured by Requirement 8 of Schedules 2A and 2B of the draft DCO (AS-004). Detailed Communication Plan(s) will be implemented by the Applicants as approved by the relevant local planning authorities in consultation with the relevant statutory stakeholders, as appropriate.

2.20 Landscape and visual impact

2.20.1 Summary of matters raised

- 2.20.1.1 Some Relevant Representations stated that the Transmission Assets would have a negative impact on the landscape, including changing the character from rural to industrial and the loss of open views and rural views
- 2.20.1.2 While most Relevant Representations focused on the impacts of the onshore substations on the landscape, some also raised concerns regarding the scarring of the landscape by the onshore cable route and others raised concerns regarding the impacts of the turbines on the seascape.
- 2.20.1.3 Some Relevant Representations also raised concerns regarding the impact lighting would have on nearby communities and wildlife during both the construction and operation of the Transmission Assets.
- 2.20.1.4 Some Relevant Representations queried the potential impacts to trees covered by Tree Preservation Orders.
- 2.20.1.5 The theme of landscape and visual impact was raised by approximately 55% of Relevant Representations.

2.20.2 Applicants' response

Onshore substations

- 2.20.2.1 The Applicants acknowledge the potential visual impact of the onshore substations and their location within the existing landscape.
- 2.20.2.2 The Applicants' siting of the onshore substations has sought to minimise their visibility as much as possible by utilising existing screening and maximising the distance from residential areas, wherever possible. The site selection and consideration of alternatives process for the siting of the onshore substations is detailed within Volume 1, Chapter 4: Site Selection and Consideration of Alternatives of the Environmental Statement (AS-026)
- 2.20.2.3 Landscaping mitigation at the onshore substations is set out in the Outline Landscape Management Plan (OLMP) (document reference APP-208) and supported by the Outline Design Principles (APP-209). These explain that on-site mitigation planting proposals will be implemented around the onshore substations in order to minimise their visual effect from key viewpoints/receptors and to maximise screening opportunities, while also responding to local landscape character, pattern and growing conditions. The site design will also take account of the opportunities for site won topsoil and subsoil materials to be reused on-site within landscape earthworks 'bunds'. These bunds will support the visual screening of the onshore substations while having a gradual external slope gradient that appears natural and complements the existing terrain (when looking towards the onshore substations).
- 2.20.2.4 The Outline Design Principles (APP-209) sets out the considerations that will inform the detailed design of the permanent works at each of the onshore substations, including their height, layout and maximum footprint. The detailed design of each of the onshore substations will be developed in accordance with the Outline Design Principles, as secured by Requirement 4(2) of Schedule 2A and Schedule 2B of the draft DCO (AS-004). These details will be submitted to and approved by the relevant planning authority prior to start of construction for each of the onshore substations.
- 2.20.2.5 The ES assesses potential impacts on landscape character and visual resources during construction, operation and maintenance and decommissioning with the proposed landscape mitigation outlined in the OLMP (APP208) to minimise impacts, where possible. The landscape and visual assessment (Volume 3, Chapter 10: Landscape and visual resources of the ES) (APP-123) is based on the maximum (worst case) design scenario using the largest potential footprint and tallest buildings.

Onshore and intertidal cables

- 2.20.2.6 The Applicants have made a commitment that (CoT08 of Volume 1, Annex 5.3: Commitments Register of the ES (AS-030)) post-construction, the working area will be reinstated to pre-existing condition as far as reasonably practicable in line with the DEFRA Construction Code of Practice for the Sustainable Use of Soils on Construction Sites

(PB13298), Institute of Quarrying (IQ) Good Practice Guide for Handling Soils in Mineral Workings (IQ, 2021) and British Society of Soil Science (BSSS) Working with Soil Guidance Note on Benefitting from Soil Management in Development and Construction (BSSS, 2022). This commitment is secured by Requirement 16 of Schedules 2A and 2B of the draft DCO (AS-004) which states that land must be reinstated in accordance with details approved by the relevant planning authority.

2.20.2.7 The Outline Soil Management Plan (APP-200) sets out measures to protect soil quality and structure during construction, ensuring that the land remains viable for farming in the long term. This includes the production of an aftercare plan to be produced for agricultural areas within the Onshore Order Limits which will be subject to agreement with the Agricultural Liaison Officer and the affected landowner(s). This is secured in the DCO through Requirement 8 (Code of Construction Practice), which includes production of a Soil Management Plan in accordance with the Outline Soil Management Plan (APP-200).

2.20.2.8 While some land will be subject to temporary disturbance, the majority of the cable corridor will be reinstated to pre-existing condition as far as reasonably practicable to allow agricultural use to resume following construction which is secured by Requirement 18 (Restoration of land temporarily used for construction) of Schedules 2A and 2B to the draft Development Consent Order (AS-004).

Seascape

2.20.2.9 No above sea-level structures or elements of sea surface-piercing infrastructure, such as turbines, form part of the Application for development consent for the Transmission Assets. Therefore, no potential impacts are expected to give rise to likely significant effects on landscape or seascape character, or visual receptors associated with offshore infrastructure.

2.20.2.10 Following a meeting held 22 February 2024 a Technical Note (EOR0823-04) was issued to Blackpool Council, Fylde Council, South Ribble Council and Natural England and it was agreed to remove this element of assessment from the Environmental Statement.

Tree Preservation Orders

2.20.2.11 The Applicants have made a commitment (CoT03 of Volume 1, Annex 5.3: Commitments Register of the ES (AS-030)) to directly avoid Ancient Woodland sites and known Tree Preservation Orders (TPOs) where practicable during the site selection process for the Transmission Assets. Where possible, unprotected areas of woodland, mature and protected trees (i.e. veteran trees) have and will also be avoided, including the veteran tree located to the north east of National Grid Penwortham substation.

2.20.2.12 Volume 3, Annex 10.5 Tree survey and arboricultural impact assessment – Part 1 and Part 2 (APP-128 and APP-129) provides an assessment of the arboricultural impact of the Transmission Assets. This includes consideration of Tree Preservation Orders. Information on Tree

Preservation Orders has been added to the tree constraints plans (Appendix B of APP-128 and APP-129) and tree protection plans (Appendix C of APP-128 and APP-129). The assessment concludes that there is no impact to TPO trees or to trees within conservation areas.

- 2.20.2.13 The Applicants have also submitted a Tree Preservation Order and Hedgerow Plan (Parts 1, 2 and 3) (APP-165, APP-166 and APP-167, respectively) that is secured by Schedule 11A of the draft DCO (AS-004). The Applicants note that no Tree Preservation Orders are identified on the plans.

Lighting during construction

- 2.20.2.14 Volume 1, Chapter 3: Project description of the ES (APP-024) states that task lighting may be required during working hours in the winter months and for periods of 24-hour construction (such as at the landfall where trenchless installation techniques are proposed). Details of construction lighting will be set out in the detailed Construction Artificial Light Emissions Management Plan(s) as part of the detailed Code of Construction Practice(s) (CoCP) which is secured by Requirement 8 of Schedules 2A and 2B of the draft DCO (AS-004).
- 2.20.2.15 CoT28 of Volume 1, Annex 5.3: Commitments Register (AS-030) states that construction site lighting will only operate when required during construction activities and will be positioned and directed to avoid unnecessary illumination to residential properties, sensitive ecological receptors and footpath users, and minimise glare to users of adjoining public highways. Construction site lighting will be designed in accordance with latest relevant available guidance and legislation and the details of the location, height, design and luminance of lighting to be used will be detailed within the Outline Construction Artificial Light Emissions Management Plan (APP-204), as part of the Outline CoCP (APP-193).

Lighting at the onshore substations during operation

- 2.20.2.16 Operational lighting requirements at the onshore substations may include limited lighting, such as, security lighting, car park lighting and repair / maintenance lighting. Further details on this are set out in Volume 1, Chapter 3: Project description of the ES (APP-024).
- 2.20.2.17 The Outline Design Principles (APP-209) sets out the considerations that will inform the detailed design of the permanent works at each of the onshore substations, including operational lighting requirements. The Outline Design Principles (APP-209) explains that any operational lighting will be low level and directional to minimise light spill onto ecological habitats and residential areas. The detailed design of each of the onshore substations will be developed in accordance with the Outline Design Principles, as secured by Requirement 4(2) of Schedule 2A and Schedule 2B of the draft DCO (AS-004). These details will be submitted to and approved by the relevant planning authority prior to start of construction at each of the onshore substations.
- 2.20.2.18 Additionally, Requirement 17 of Schedule 2A and Schedule 2B of the draft DCO (AS-004) states that the onshore substations must not be

brought into operation until a written scheme for the management and mitigation of internal and external artificial light emissions has been submitted to and approved by the relevant planning authority. This will ensure the Applicants' commitments to minimising the effects of any operational lighting are delivered.

2.21 Local economy

2.21.1 Summary of matters raised

- 2.21.1.1 Some Relevant Representations raised concerns that the Transmission Assets would negatively impact local businesses. Some Relevant Representations were concerned that the Transmission Assets would have a negative impact on the tourism industry in the surrounding area.
- 2.21.1.2 Some Relevant Representations were concerned that the Transmission Assets would have a negative impact on BAE Systems, a major local employer.
- 2.21.1.3 The theme of the local economy was raised by approximately 41% of Relevant Representations.

2.21.2 Applicants' Response

Local businesses

- 2.21.2.1 The Applicants note concerns regarding impacts to local businesses. Section 2.12.2 of Volume 4, Chapter 2: Socio-economics (APP-141) assesses the potential impacts on businesses as a result of the construction of the Transmission Assets. The assessment concluded that there would be a minor beneficial effect on businesses, which is not considered significant in EIA terms.

Tourism

- 2.21.2.2 Potential impacts on tourism have been assessed within Volume 4, Chapter 2: Socio-economics (APP -141), specifically the indirect impacts on visual amenity and recreation (e.g., on users of public rights of way, cycle routes and the beach) and on overnight trips and accommodation. The assessment concludes that there will be no significant effects upon tourism and the tourist economy arising from the Transmission Assets during the construction, operation and maintenance or decommissioning phases.
- 2.21.2.3 Other potential impacts on local amenity and indirect impacts on residents and visitors have been assessed in Volume 1, Annex 5.1: Human health (APP-035), which considers the assessments within Volume 3, Chapter 7: Traffic and transport (APP-108), Volume 3, Chapter 8: Noise and vibration (APP-117) and Volume 3, Chapter 9: Air quality (APP-121). Again, the assessments have identified that there will be no significant effects on residents and visitors during the construction, operation and maintenance or decommissioning phases.

BAE Systems

- 2.21.2.4 The Applicants are in ongoing dialogue with by BAE Systems Warton (Aerodrome) to further understand and discuss their operations and potential safety concerns, including the potential for any further related appropriate mitigation measures at the aerodrome. The Applicants are confident that those concerns can be satisfactorily addressed.
- 2.21.2.5 Volume 3, Chapter 11: Aviation and Radar of the Environmental Statement (APP-130) has scoped out potential effects on BAE Systems Warton (Aerodrome). The Transmission Assets Order Limits lies beyond the Communication, Navigation and Surveillance (CNS) and the runway safeguarded area of BAE Systems Warton (Aerodrome); over 2.5 km from the runway strip. The Onshore Order Limits and Intertidal Infrastructure Area lie below the Warton Aerodrome Obstacle Limitation Surfaces (OLS) 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.
- 2.21.2.6 The Applicants recognise the concerns raised about the potential effect on mental health of those living and working in proximity to the works.
- 2.21.2.7 The Applicants have assessed how the Transmission Assets could affect different aspects of the environment that influence population health and this is reported at Volume 1, Annex 5.1: Human health (APP-035). This includes changes to the social, economic and bio-physical environment and is informed by the results of other assessments as reported in the ES. This assessment utilises the World Health Organisation definition of health and wellbeing, which includes mental wellbeing. Any effects are assessed to be not significant and will be appropriately addressed through the sharing of relevant information with the public as set out in the Outline Communications Plan (APP-194) and the Applicants' adherence to health protection standards as set out in the Code of Construction Practice (APP-193). Detailed Communication Plan(s) will be developed from the Outline Communication Plan (APP-194) and will form part of the detailed CoCP(s). The detailed CoCP(s) are secured by Requirement 8 of Schedules 2A and 2B of the draft DCO (AS-004). Detailed Communication Plan(s) will be implemented by the Applicants as approved by the relevant local planning authorities in consultation with the relevant statutory stakeholders, as appropriate.

2.22 Local projects benefits

2.22.1 Summary of matters raised

- 2.22.1.1 Some Relevant Representations questioned if the Transmission Assets would bring about any specific benefits for the local area.
- 2.22.1.2 Some Relevant Representations asked if it would be possible for local residents and businesses to receive a discount on energy prices as a result of the Transmission Assets being located nearby.

2.22.1.3 The theme of local project benefits was raised by approximately 5% of Relevant Representations.

2.22.2 Applicants' response

2.22.2.1 A summary of the benefits of the Transmission Assets is set out in Section 6 of the Planning Statement (APP-233). The Transmission Assets would:

- make a contribution towards the UK's part in meeting the recently agreed COP28 Global Renewables and Energy Efficiency Pledge to triple the world's installed renewable energy generation capacity by 2030;
- contribute towards the British Energy Security Strategy's target of 50 GW of offshore wind by 2030, as set out in the UK Government's 2022 Energy Security Statement;
- assist in meeting the UK Government's target in the Climate Change Act of 'net zero' greenhouse gas emissions for the year 2050 (i.e., to be 100% lower than the 1990 levels) in order to meet its obligations under international climate change agreements;
- assist in meeting future increases in electricity demand as significant sectors of energy demand switch from being powered by fossil fuels to using electricity;
- result in significant beneficial effects in terms of the cumulative assessment on climate change; and
- result in beneficial effects from increase on Gross Value Added (GVA).

2.22.2.2 Furthermore, in accordance with the Onshore Biodiversity Benefit Statement (AS-054), there would also be potential for long term benefits associated with onshore biodiversity, for example via the biodiversity benefit area at Lea Marsh.

2.22.2.3 A full socio-economic impact is presented in Volume 4, Chapter 2: Socio-economics of the ES (APP-141). An Outline Employment and Skills Plan (OESP) has been prepared and submitted as part of the application for development consent (APP-239) to support the delivery of wider benefits associated with the Transmission Assets. Section 1.7 includes outline principles, ranging from engagement with all stages of the education system to approaches to recruitment and ongoing workforce training and development. Table 1.4 sets out outline initiatives that aim to work to support employment and skills development in alignment with the outline principles. Further detail on initiatives will be taken forward and developed by each of the Applicants in consultation with the relevant stakeholders.

2.22.2.4 The requirement to produce a detailed Employment and Skills Plan(s) in accordance with the OESP in consultation with Lancashire County Council is secured by Schedules 2A and 2B of Requirement 19 of the draft Development Consent Order (AS-004).

Jobs

- 2.22.2.5 A full impact assessment in relation to socio-economics is presented in Volume 4, Chapter 2: Socio-economics of the ES (APP-141). Tables 2.69 and 2.73 identify the potential for up to 255 employment opportunities (Full Time Equivalent years) for local residents in the study area during development and construction, and up to 50 such opportunities during the operation and maintenance phase.
- 2.22.2.6 An Outline Employment and Skills Plan has been prepared and submitted as part of the application for development consent (APP-239) to support the delivery of economic benefits associated with the Transmission Assets. Section 1.7 includes outline principles, ranging from engagement with all stages of the education system to approaches to recruitment and ongoing workforce training and development. Table 1.4 sets out outline initiatives that aim to work to support employment and skills development in alignment with the outline principles. The outline initiatives will be developed by the Applicants in consultation with the relevant stakeholders.
- 2.22.2.7 The requirement to produce detailed Employment and Skills Plan(s) in accordance with the OESP in consultation with Lancashire County Council is secured by Schedules 2A and 2B of Requirement 19 of the draft DCO (AS-004).

Discounted energy

- 2.22.2.8 The Applicants do not have the ability to determine or control where electricity generated by the Morgan Offshore Wind Project or Morecambe Offshore Windfarm is allocated. The allocation of electricity, and associated costs of energy, is determined by National Energy System Operator (NESO).

2.23 Marine environment

2.23.1 Summary of matters raised

- 2.23.1.1 Some Relevant Representations raised concerns regarding the impact to marine wildlife and the impacts to coastal processes.
- 2.23.1.2 The theme of impacts to the marine environment was raised by approximately 1% of Relevant Representations.

2.23.2 Applicants' response

- 2.23.2.1 The Applicants have assessed the potential impacts likely to give rise to significant effects in relation to the marine environment in Volume 2 of the Environmental Statement (APP-042 to APP-066).

2.24 Noise

2.24.1 Summary of matters raised

- 2.24.1.1 Some Relevant Representations stated their concern relating to noise pollution during the construction of Transmission Assets, including as a result of increased traffic movements. Other Relevant Representations raised concerns regarding the operation of the Transmission Assets and noise that would be emitted from the onshore substations, including a concern that there would be a constant hum which would impact nearby properties and schools.
- 2.24.1.2 The theme of noise was raised by approximately 32% of Relevant Representations.

2.24.2 Applicants' response

- 2.24.2.1 The Applicants have assessed the potential impacts of both construction and operational noise in Volume 3, Chapter 8: Noise and vibration (APP-117). Mitigation measures identified to manage the potential effects of construction noise will be managed through Construction Noise and Vibration Management Plan(s), which will be developed from the Outline Construction Noise and Vibration Management Plan (APP-196) and which forms part of the Outline Code of Construction Practice (OCoCP). The detailed CoCP(s) are secured by Requirement 8 of Schedules 2A and 2B of the draft DCO (AS-004). Detailed Construction Noise and Vibration Management Plan(s) will be implemented by the Applicants as approved by the relevant local planning authorities in consultation with the relevant statutory stakeholders, as appropriate.
- 2.24.2.2 With regards to potential operational noise arising from Work No. 21A (Morgan onshore substation) and Work No. 21B (Morecambe onshore substation) the Applicants must carry out these works in accordance with the detailed operational noise management plan(s), as approved by the relevant local planning authorities in accordance with Requirement 18 of Schedules 2A and 2B of the draft DCO (AS-004).

2.25 Planning policy

- 2.25.1.1 Some Relevant Representations have stated that they do not believe the Transmission Assets comply with a variety of local and national policies including the Fylde Local Plan, the Local Development Framework, the National Policy Statements or the Electricity Act.
- 2.25.1.2 Some Relevant Representations raised objections on the basis that development of the Transmission Assets would breach the Human Rights Act 1998, particularly Article 8 (the right to respect for private and family life) and Article 1 of Protocol 1 (the right to peaceful enjoyment of property).
- 2.25.1.3 The theme of planning policies was raised by approximately 8% of Relevant Representations.

2.25.2 Applicants' response –

Local and national policy

- 2.25.2.1 The Applicants consider that the section on 'Government legislation and policy' in the Rule 6 letter (PD-006) confirms that the primary policy framework for decision-making on the Transmission Assets is NPS EN-1.
- 2.25.2.2 National and local planning policies have been fully considered in the Planning Statement (APP-233). Section 3 of the Planning Statement (APP-233) details the national and local planning policies relevant to the Transmission Assets while section 5 provides an overview of compliance with these policies.
- 2.25.2.3 The National Planning Policy Framework Tracker (APP-234) and the Local Planning Policy Tracker (APP-236) detail how the project aligns with policy requirements, including those related to the Green Belt and Very Special Circumstances.
- 2.25.2.4 The Local Planning Policy Tracker in particular details how the Applicants have considered and assessed the potential impacts of Transmission Assets against the relevant local plans (APP-236).

Human Rights Act 1998

- 2.25.2.5 Section 1.11 of the Statement of Reasons (AS-009) sets out how the Application is compliant with the Human Rights Act (HRA) 1998 and deals specifically with Articles 1 and 8 summarised below. .
- 2.25.2.6 Article 1 of the First Protocol to the Convention protects the right to peaceful enjoyment of possessions. No one shall be deprived of those possessions except where it is in the public interest and where relevant provisions of law allow for it.
- 2.25.2.7 Article 8 of the Convention protects the right to respect for private and family life, home and correspondence. No one shall be deprived of that except in cases where it is in accordance with the relevant laws and necessary in the interests of, amongst other things, national security, public safety or the economic wellbeing of the country
- 2.25.2.8 Given the inclusion of the compulsory acquisition powers in the draft DCO (AS-004), there is a possibility that Articles 1 and 8 of the HRA could be infringed in relation to persons who hold interests in the Order land.
- 2.25.2.9 In cases of development consent orders, Section 122 of the PA 2008 allows for the provision of compulsory acquisition powers and as such, there is provision in law which allows these powers to be granted.
- 2.25.2.10 The need for the Transmission Assets is set out in the Planning Statement (APP-233) and is summarised in section 1.4 of the Statement of Reasons (AS-009). This demonstrates that the development is within the public interest given the significant benefits Morgan Offshore Wind Project and the Morecambe Offshore Windfarm will bring.

- 2.25.2.11 Furthermore, the Applicants have sought to limit the extent of the land to be acquired by compulsory acquisition by seeking to agree the acquisition of land and rights with landowners and only seeking compulsory acquisition powers in relation to land which is necessary for the development. In addition, the land and rights sought are the minimum necessary to deliver the Transmission Assets.
- 2.25.2.12 If the land needed to bring forward the development cannot all be acquired through voluntary agreement, then without the ability to use compulsory acquisition powers it may not be possible for the Transmission Assets to be developed. In such cases the significant public benefits would not be realised.
- 2.25.2.13 Those who are affected also have the right to claim compensation in accordance with the statutory compensation code. Compensation has been factored into consideration of funding for the Transmission Assets (see the Funding Statement (APP-008)).
- 2.25.2.14 In the event the DCO is granted, a person affected has the right to challenge the decision via a claim for judicial review if there are grounds for claim made out pursuant to Section 118 of the PA 2008. This could include grounds relating to the decision to include compulsory acquisition powers within the DCO.
- 2.25.2.15 The approach taken is therefore proportionate and legitimate. Inclusion of compulsory acquisition powers in the DCO would not amount to unlawful infringement of the HRA 1998 or the Convention.

2.26 Principle of the Transmission Assets

2.26.1 Summary of matters raised

- 2.26.1.1 Some Relevant Representations objected to offshore wind projects generally as they were viewed as either unnecessary or not cost effective. Some Relevant Representations stated a preference for nuclear or tidal power.
- 2.26.1.2 Some Relevant Representations raised concerns that the electricity generated would be wasted due to a lack of capacity within the National Grid and questions if there was enough battery storage capacity to cope with the increase energy output.
- 2.26.1.3 The theme of principles of the Transmission Assets was raised by approximately 1% of Relevant Representations.

2.26.2 Applicants' response

- 2.26.2.1 The National Policy Statements (NPSs) establish the policy need for new renewable energy generation. As an integral part of a nationally significant low carbon infrastructure project, the Transmission Assets are considered to be critical national priority (CNP) infrastructure, as set out in paragraph 4.2.4 of NPS EN-1 and the sections 5.24, 6.2 and 6.4 of the Planning Statement (APP-233). Paragraph 4.2.5 of NPS EN-1 confirms that energy transmission projects directed to be considered under the Planning Act 2008 under a section 35 direction (as is the case for the

Transmission Assets) constitute CNP infrastructure. The policy and legislative support for the scheme is set out in full in the Planning Statement (APP-233).

- 2.26.2.2 The National Energy System Operator (NESO) is responsible for managing the National Grid and ensuring that there is adequate capacity for new offshore wind projects, including Morgan Offshore Wind Farm and Morecambe Offshore Wind Farm.
- 2.26.2.3 The Applicants are committed to developing the Transmission Assets in a way that is sensitive to the local community and the environment, minimising effects wherever possible.

2.27 Property prices

2.27.1 Summary of matters raised

- 2.27.1.1 Some Relevant Representations raised concerns regarding a potential reduction in property prices and the ability to sell homes.
- 2.27.1.2 The theme of property prices was raised by approximately 8% of Relevant Representations.

2.27.2 Applicants' response

- 2.27.2.1 The Applicants do not envisage any impact on property prices. The Transmission Assets will be fully compliant with the compensation code where diminution in property prices can be demonstrated to have been caused by the Transmission Assets. The code sets out the parameters and evidence needed to substantiate a claim for diminution in value and when this happens. The UK Government has also produced a series of plain English general guides to compulsory purchase and compensation which may be useful: Compulsory purchase and compensation (www.gov.uk Guide books 1 and 4 being the most appropriate).

2.28 Recreational spaces

2.28.1 Summary of matters raised

- 2.28.1.1 Some Relevant Representations raised concerns regarding the closure of recreational facilities as a result the Transmission Assets.
- 2.28.1.2 Some Relevant Representations were concerned about access to the countryside for walking, cycling and horse riding.
- 2.28.1.3 Some Relevant Representations objected to the crossing of the Blackpool Road Recreation Ground as it would reduce opportunities for local sports teams.
- 2.28.1.4 Some Relevant Representations objected to the crossing of St Anne's Old Links Golf Course, including concerns that the crossing would result in the golf course closing and concerns about major events being disrupted. Some Relevant Representations were concerned about the infrastructure associated with the golf course potentially being damaged by construction.

- 2.28.1.5 The theme of recreational spaces was raised by approximately 43% of Relevant Representations.

2.28.2 Applicants' response

Public Rights of Way

- 2.28.2.1 The Applicants will manage and maintain access to the existing Public Rights of Way (PRoW) network during construction (CoT91 of Volume 1, Annex 5.3: Commitments Register of the ES). No PRoW will be permanently stopped up as a result of the construction, operation and maintenance or decommissioning of the Transmission Assets.
- 2.28.2.2 To manage the potential impacts of construction, the Applicants will apply the measures described in the Outline PRoW Plan (AS-048). For the majority of the PRoW intersected by the Onshore Order Limits, it is proposed that these will remain open with appropriate signage (i.e. managed crossings) to warn of the presence of construction vehicles, and to warn of the presence of walkers, cyclists and horse riders. These managed crossings of PRoW will be fenced off with gated crossing points and temporary site fencing to prevent the public from accessing the PRoW, when access would need to be managed. Where there is a specific requirement to maintain the access, a suitable route will be clearly marked out to aid safe passage. Where such crossings are installed, a gap will be left in the topsoil bunds after the topsoil has been stripped within the onshore export cable corridors.
- 2.28.2.3 The measures to be implemented as part of the PRoW Management Strategy 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. The detailed Public Right of Way Management Plan(s), which will be developed in accordance with the outline Public Rights of Way Management Plan (AS-048), and which forms part of the detailed Code of Construction Practice(s). The detailed CoCP(s) are secured by Requirement 8 of Schedules 2A and 2B of the draft DCO (AS-004). Detailed Public Right of Way Plan(s) will be implemented as approved by the relevant local planning authority.

Blackpool Road Recreation Ground

- 2.28.2.4 As set out within Sections 6.11.4.14 to 6.11.4.19 of Volume 3, Chapter 6 of the Environmental Statement (APP-104) construction of the Transmission Assets will result in a temporary short-term reduction in available open green space land at Blackpool Road Recreation Ground. The Applicants have made a commitment (CoT32 of Volume 1, Annex 5.3: Commitments Register of the ES (AS-030)) to producing an open space management plan to minimise potential impacts to users of Blackpool Road Recreation Ground. This is secured by Requirement 8 within Schedules 2A & 2B of the draft Development Consent Order (AS-004). Detailed Open Space Management Plan(s) will be implemented by the Applicants as approved by the local planning authorities.

- 2.28.2.5 Furthermore, the Applicants have made a commitment (CoT124 of Volume 1, Annex 5.3: Commitments Register of the ES (AS-030)) to provide appropriate mitigation, for construction activities at Blackpool Road Recreation Ground (for example, the relocation or provision of alternate amenities). The Applicants are in discussions with the relevant parties in relation to separate agreements (for example, via section 106 agreements under the Town and Country Planning Act 1990 and/or section 111 agreements under the Local Government Act 1972) to deliver any additional mitigation required and minimise disruption to recreational users of the Blackpool Road Recreation Ground.

St Anne's Old Links Golf Club

- 2.28.2.6 The Applicants have undertaken a rigorous and robust route planning and site selection process as presented in Volume 1, Chapter 4: Site selection and consideration of alternatives (AS-026). In line with the guiding principles of site selection process and as part of the feedback received during consultation the project has committed to the installation of the onshore export cable corridor by trenchless techniques from Blackpool Airport to the Landfall underneath a series of constraints including the Lytham St Annes Dunes SSSI, Clifton Drive North (A584 Road), railway and St Anne's Old Links Golf Course (CoT44 of Volume 1, Annex 5.3: Commitments Register of the ES (AS-030)). The Applicants have actively sought opportunities to mitigate the potential effects of the onshore cable route, with the aim of protecting the landscape character and qualities wherever possible. Locating the entry pits at Blackpool Airport, and not St Annes Old Links Golf Course, achieves this by minimising impact to the landscape and surrounding community. The Applicants have also made a similar commitment of using trenchless techniques in a number of locations as set out in CoT02 of Volume 1, Annex 5.3: Commitments Register of the ES (AS-030), secured by Requirements 5 and 8 within Schedules 2A and 2B of the draft Development Consent Order (AS-004). Thus the Applicants consider that the St Anne's Old Links Golf Course has not been given preferential treatment for the use of trenchless installation techniques.
- 2.28.2.7 The Applicants note the concerns regarding the crossing of existing utility infrastructure. Volume 1, Annex 3.2: Onshore Crossing Schedule presents the obstacles identified across the intertidal and onshore proposed to be crossed by the Transmission Assets. The cable crossings of utility providers will be carried out in compliance with the protective provisions and any necessary supplementary agreements between the relevant parties. Protective provisions have been included at Schedule 10 of the draft Development Consent Order (AS-004).

2.29 Safety

2.29.1 Summary of matters raised

- 2.29.1.1 Some Relevant Representations raised safety concerns. Some Relevant Representations were concerned about the impact of cables crossing

directly underneath properties. Other Relevant Representations were concerned about the risk of fires, accidents and electrical failures.

- 2.29.1.2 The theme of safety was raised by approximately 4% of Relevant Representations.

2.29.2 Applicants' response

- 2.29.2.1 The Applicants can confirm that no onshore export cables are proposed to run directly underneath properties via trenchless installation techniques. The Applicants have undertaken a rigorous and robust route planning and site selection process. The Applicants have set out their approach to onshore export cable corridor routing within Volume 1, Chapter 4: Site Selection and Consideration of Alternatives (AS-026) and its supporting annexes. Section 4.3 of Volume 1, Annex 4.3: Selection and Refinement of the Onshore Infrastructure (APP-033) states that avoiding direct impact to residential properties was one of the principles that guided the onshore infrastructure selection and refinement process, specifically the onshore export cable. In addition, the Applicants made a commitment (CoT21 of Volume 1, Annex 5.3: Commitments Register of the ES (AS-030)) that there would be no permanent High Voltage infrastructure installed above surface within 110 m of residential properties and subsurface infrastructure within 50 m of residential properties from the onshore substations. This is secured by Requirement 4, of Schedules 2A and 2B of the draft DCO (AS-004).
- 2.29.2.2 The Applicants acknowledge the importance of safety regarding the installation and operation of high-voltage cables through residential areas, such considerations are inherent to the detailed engineering considerations of cable specifications and routing. Volume 1, Annex 5.1: Human Health of the Environmental Statement (APP-035) presents the assessment of the potential impact of the Transmission Assets. Specifically, considering the potential impact to safety during the construction, operations and maintenance and decommissioning phases in relation to relevant guidance and policy, and concludes effect to be negligible and not significant in EIA terms.

2.30 Sand dunes

2.30.1 Summary of matters raised

- 2.30.1.1 Some Relevant Representations raised concerns about impacts to the sand dunes within the Order Limits. Concerns focused on impacts to the designated habitat, including the habitat of the protected sand lizards; and disruption to coastal defences.
- 2.30.1.2 The theme of sand dunes was raised by approximately 17% of Relevant Representations.

2.30.2 Applicants' response

- 2.30.2.1 Lytham St Annes Dunes SSSI comprises a sand beach which by nature of elevation provides an informal flood defence. There will be no direct

impacts to the dunes as a result of the construction of the Transmission Assets. This is because the Lytham St Annes Dunes SSSI will be crossed utilising trenchless techniques. The exit pit on the beach will be situated 100 m seaward of the western boundary of Lytham St Annes Dunes SSSI (as set out in CoT44, secured by Requirement 8 of Schedules 2A & 2B, of the draft DCO (AS-004)).

2.30.2.2 The avoidance of open cut trenching through the Lytham St. Anne's dunes will ensure there will be no direct loss of vegetation or habitats and the protected features of the dunes will be preserved.

2.30.2.3 The Applicants' assessment of the potential for increased flood risk arising from damage to the existing flood defences, including the sand dunes at Lytham St Annes is presented within section 2.11.4 of Volume 3, Chapter 2: Hydrology and flood risk of the ES (APP-070). This concludes that as a result of the embedded mitigation measures set out above there will be no increase in flood risk as a result of the installation of the offshore export cables.

2.31 Site Selection and assessment of alternatives

2.31.1 Summary of matters raised

2.31.1.1 Some Relevant Representations claimed that the Applicants had not adequately considered viable alternatives.

2.31.1.2 Some Relevant Representations stated strong preferences for alternative onshore cable routes and substation locations, these included the routing the cables to Stanah via Hillhouse Enterprise Zone, routing the cables up the River Ribble or connecting to the National Grid at alternative locations including Heysham and Liverpool.

2.31.1.3 The theme of site selection and assessment of alternatives was raised by approximately 54% Relevant Representations.

2.31.2 Applicants' response

2.31.2.1 The Applicants have undertaken a rigorous and robust route planning and site selection process. The Applicants have set out their approach to offshore and onshore export cable corridor routing within Volume 1, Chapter 4: Site Selection and Consideration of Alternatives (AS-026) and its supporting annexes. Following the identification of the Point of Interconnection (Penwortham) for both Morgan and Morecambe, the Applicants followed the sequential process set out in section 4.7.1 onwards to identify suitable locations for landfall and the cable corridors and onshore substations. The site selection chapter explains in detail the numerous options considered and the reasons for the final chosen locations. The alternatives were also subject to non-statutory and statutory consultations and feedback received was taken into account in the final route.

Offshore Transmission Network Review (OTNR)

- 2.31.2.2 The Offshore Transmission Network Review (OTNR) was launched in 2020 by DESNZ to ensure that the transmission connections for offshore wind generation are delivered in a way that most appropriately balanced environmental, social and economic factors. The OTNR was a new approach from Government to ensure a more co-ordinated approach to identifying grid connection locations, which considers the impacts and benefits holistically (it replaced the previous individual project-by-project connection and infrastructure identification process).
- 2.31.2.3 Both the Morgan Offshore Wind Project and the Morecambe Offshore Windfarm were scoped into the 'Pathways to 2030' workstream under the OTNR. Under the OTNR, the Electricity System Operator (ESO) (now known as the National Energy System Operator (NESO)) was required to identify options to improve the coordination of offshore wind generation connections and transmission networks. The output was Holistic Network Design Review (HNDR). The HND was carried out in accordance with Terms of Reference adopted by the OTNR Board, which included BEIS, Ofgem, The Crown Estate (TCE) and NESO, which confirms that the HND needed to consider cost, deliverability and operability, environmental impacts and community impacts on an equal footing.
- 2.31.2.4 A key recommendation of the HND process for the Morgan Offshore Wind Project and the Morecambe Offshore Windfarm is stated below:
- 2.31.2.5 "For the R4_5 (Morgan) and R4_6 (Morecambe) wind farms, we are recommending radial connections with a shared cable corridor. The shared onshore and offshore cable corridor and landfall minimise the impact of the cables on the environment and local community. This is consistent with the developers' proposal and is expected to limit deliverability risks as a result of a smaller, simpler offshore platform design."
- 2.31.2.6 See Figures 11 and 28 of the HND.
- 2.31.2.7 The HND and approaches which align with it are endorsed by national policy. See paragraph 2.13.1 – 2.13.4 of NPS EN-5, which states:
- 2.31.2.8 "2.13.1 The strategic network designs such as those led or enabled by National Grid Electricity System Operator (ESO) will usually form the basis for identifying proposals for co-ordinated transmission. This includes the Holistic Network Design (HND) for offshore-onshore transmission prepared by ESO.
- 2.31.2.9 2.13.2 The HND and subsequent network design and planning exercises (35) identify and establish the transmission capabilities needed, both onshore and offshore, to support offshore wind developments. These include the onshore connection points for offshore transmission and potential future Multi-Purpose Interconnector opportunities. Government recognises the work undertaken in the HND; the HND and subsequent network design exercises are likely to contain information that is important and relevant in the consideration of applications for infrastructure resulting from those exercises.

- 2.31.2.10 2.13.3 The work of the HND and its subsequent follow up exercises considered the objectives for designs to be economic and efficient, deliverable and operable, minimise impact on the environment and minimise the impact on the local communities for the offshore transmission aspects. Through this work, steps have already been taken to reduce avoidable cumulative impacts. Assessment of projects coming forward from this design should acknowledge these prior steps.
- 2.31.2.11 2.13.4 It is recognised that proposed projects which have progressed through strategic network design exercises have been considered for strategic co-ordination through those exercises. However, any opportunities for subsequent local co-ordination between projects, irrespective of whether they have been through those exercise, should be considered in project development. This is in addition to considerations on co-ordinating delivery in construction, see section 2.14.2.”
- 2.31.2.12 See also paragraph 2.15:
- 2.31.2.13 “Coordinated approaches to delivering offshore and onshore transmission to minimise overall environmental, community, and other impacts, as set out above, must be considered. The Secretary of State must be satisfied that applicants have explained the steps they have taken to do this, the options that have been considered and the approach they have taken to coordination as set out in above at section 2.13.”

Alternative grid connection points

- 2.31.2.14 A number of potential grid connection locations and options were considered by ESO through the HND process based on the grid infrastructure capacity in relation to the location of the Morgan Offshore Wind Project and Morecambe Offshore Windfarm. This process included the existing Middleton (see Section 7 of the HND) and Stanah (adjacent to the Hillhouse Enterprise Zone) substations, as confirmed to the House of Commons by Parliamentary Under Secretary of State (Department for Energy Security and Net Zero) on 17 December 2024:
- 2.31.2.15 “The Electricity System Operator (then ESO, now NESO) assessed connection to the Stanah substation for Irish Sea windfarms alongside other substations in the Northwest and North Wales as part of the Holistic Network Design. ESO identified that Stanah substation would require extension to accommodate the Morgan and Morecambe offshore windfarms. Due to limited space, a new substation would be needed, with associated time and cost. Access was challenging due to residential and recreational surroundings, and there were environmental constraints around Morecambe Bay.
- 2.31.2.16 “In contrast, Penwortham had a more accessible footprint, fewer constraints, and better electrical connectivity to the wider network”.
- 2.31.2.17 It is noted that the need for an extension of the existing Penwortham 400kV substation to establish bays for connection to the offshore network was identified as part of the HND and was a known factor in reaching the recommendation to connect at that point.

- 2.31.2.18 The HND also identified a potential landfall at Blackpool Airport which could minimise impacts on both the Ribble and Alt Estuary Special Protection Area and the urban areas around Blackpool (see Section 5.1.6 and Table 12 of the HND). The Applicants have set out their approach to route planning and site selection for the landfall, offshore and onshore export cable corridor and onshore substations within Volume 1, Chapter 4: Site Selection and Consideration of Alternatives (AS-026) and its supporting annexes.
- 2.31.2.19 The work of the HND and its subsequent follow up exercises considered the objectives for designs to be economic and efficient, deliverable and operable, minimise impact on the environment and minimise the impact on the local communities for the offshore transmission aspects. Through this work steps have already been taken to reduce avoidable cumulative impacts.

River Ribble

- 2.31.2.20 Routing the offshore export cables within the River Ribble option was specifically considered by the Applicants (Section 4.4.1 of Volume 1, Annex 4.1: Selection and refinement of cable landfall (APP-041)) and discounted for both environmental and technical reasons.
- 2.31.2.21 Environmentally, the Ribble estuary intersects with numerous ecological designations protected by UK legislation. These include the Liverpool Bay Special Protection Area (SPA), Ribble and Alt Estuary SPA, the Ribble and Alt Estuary Ramsar site (a wetland of international importance under the Ramsar Convention), and the Ribble Estuary Site of Special Scientific Interest (SSSI), Ribble Estuary Marine Conservation Zone (MCZ) and Ribble Estuary National Nature Reserve. These statutory designations protect sensitive estuarine habitat associated with European smelt (*Osmerus eperlanus* – a rare and protected species of fish) as well as breeding, passing and over-wintering bird species listed as of conservation concern. Five relevant species of bird are listed as red and 14 as amber, meaning that these bird populations are threatened and on the decline within the UK. The habitats found within the estuary consist of mudflats, sandflats and saltmarsh habitats that, along with the species listed above, are very sensitive to disturbance from construction activities.
- 2.31.2.22 From a technical feasibility perspective, the tidal nature, large tidal range and shallow water depths of the estuary 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 in extremely prolonged construction timeframes and potentially risking extensive, long-term damage to sensitive and protected habitats that support smelt and protected bird species (i.e. associated with the statutory designations), whilst also presenting unsafe working conditions during construction.
- 2.31.2.23 The Applicants' identification of a suitable landfall at Lytham St Annes and cable corridor to the National Grid Penwortham substation has minimised interactions and impacts to the protected features of the River Ribble and associated designations.

- 2.31.2.24 The Applicants' approach aligns with the Holistic Network Design's recommendation which identified the Ribble and Alt Estuary SPA as a constraint to be avoided, resulting in the conclusion that "Minimising impacts on the Ribble and Alt Estuary SPA will require landfall at Blackpool Airport". The Applicants' own site selection and routing analysis confirms the Blackpool Airport aligned landfall.

2.32 Traffic and transport

2.32.1 Summary of matters raised

- 2.32.1.1 Some Relevant Representations raised concern about the impact of the Transmission Assets on traffic during both construction and operation, including in relation to increased traffic impacting on the local area and villages; reduced road safety; damage to local roads; and reduced residential access. Some Relevant Representations raised concerns regarding increased traffic delaying emergency service response times including ambulances and the RNLI.
- 2.32.1.2 The theme of traffic and transport was raised by approximately 50% of Relevant Representations.

2.32.2 Applicants' response

- 2.32.2.1 Volume 3, Chapter 7: Traffic and Transport of the Environmental Statement (APP-108) contains an assessment of the potential impacts from the Transmission Assets on traffic and transport receptors, including the potential impacts of increased vehicle movements (i.e. Heavy Goods Vehicles (HGVs) and staff movements) and potential impacts resulting in congestion. To inform the assessment, the Applicants have undertaken a comprehensive data collection exercise including capturing of baseline traffic flows, speeds, identification of sensitive receptors and collisions for all highway links within Blackpool Council, Lancashire County Council and National Highways administration areas. In total, data for 91 highway links have been collected covering over 155 km of highway network.
- 2.32.2.2 The assessment has considered the potential impacts of the Transmission Assets in relation to driver delay, severance, non-motorised user delay, fear and intimidation, road safety and abnormal loads. This includes the consideration of maintenance of access for emergency vehicles and residential access. The assessment concludes (with the application of mitigation measures) that the residual effects would not be significant in Environmental Impact Assessment (EIA) terms. In addition, the data contained within Volume 1, Chapter 7: Traffic and Transport of the Environmental Statement (APP-108) has informed the interrelated assessments of traffic related noise, air quality and tourism.
- 2.32.2.3 The Applicants note that significant commitments have been made to the use of trenchless installation techniques, such as Horizontal Directional Drilling (HDD) to minimise disruption to all A, B and Classified roads (with the exception of Leach Lane) and railways proposed to be crossed by the Transmission Assets (see CoT02, Volume 1, Annex 5.3: Commitments

Register (AS-030)). This commitment to the use of trenchless techniques is secured via Requirement 8 (Code of Construction Practice) of Schedules 2A and 2B of the draft DCO (AS-004).

- 2.32.2.4 With regard to Leach Lane the Applicants have committed to maintaining access, with works completed on a 'half / half basis' with traffic to be controlled through the use of temporary traffic management, such as traffic signals. The open cut trenching on Leach Lane is not expected to result in any road closures and would maintain access at all times including for emergency services and for buses. The approach to managing highway crossings is outlined in Section 1.8 of the Outline Construction Traffic Management Plan (OCTMP) (APP-211). The requirement to produce the detailed CTMP(s) in accordance with the OCTMP in consultation with, and for approval by, the relevant highway authority, is secured by Schedules 2A and 2B of Requirement 9 of the draft DCO (AS-004).
- 2.32.2.5 An Outline Construction Traffic Management Plan (oCTMP) has been prepared and submitted with the application for development consent (APP-211). The requirement to produce the detailed CTMP(s) in accordance with the OCTMP in consultation with, and for approval by, the relevant highway authority, is secured by Schedules 2A and 2B of Requirement 9 of the draft DCO (AS-004).
- 2.32.2.6 Section 1.9.3 outlines that where necessary and where agreed with the relevant highways authority as a part of the detailed CTMP(s), post-consent, video surveys may be undertaken of those local roads where it is considered that the passage of construction HGVs may cause deterioration of highways.
- 2.32.2.7 The results will be discussed with the relevant highways authority and where it is agreed that damage has resulted from the passage of HGVs associated with construction work for the Transmission Assets a remediation strategy will be agreed with the highways authority.