

MORGAN AND MORECAMBE OFFSHORE WIND FARMS: TRANSMISSION ASSETS

Annex 3.2.5 to Response to RR -Lancashire County Council (RR-1262)



Deadline: Procedural Deadline
Application Reference: EN020028

Document Numbers:
MRCNS-J3303-JVW-19018
MOR001-FLO-CONCAG-RPT-0025

Document Reference: S_PD_3.2.5

11 April 2025
F01

Document status					
Version	Purpose of document	Approved by	Date	Approved by	Date
F01	Response to RR at Procedural Deadline	AS	11 April 2025	IM	11 April 2025

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Glossary

Term	Meaning
Applicants	Morgan Offshore Wind Limited (Morgan OWL) and Morecambe Offshore Windfarm Ltd (Morecambe OWL).
Candidate Special Areas of Conservation	Areas that were submitted to the European Commission as candidates for designation as a Special Area of Conservation before the end of the Transition Period following the UK's exit from the EU, but not yet formally designated. See also Special Areas of Conservation.
Development Consent Order	An order made under the Planning Act 2008, as amended, granting development consent.
Environmental Impact Assessment	The process of identifying and assessing the significant effects likely to arise from a project. This requires consideration of the likely changes to the environment, where these arise as a consequence of a project, through comparison with the existing and projected future baseline conditions.
Environmental Statement	The document presenting the results of the Environmental Impact Assessment process.
European Protected Species	Species (such as bats, great crested newts, otters and dormice) which receive full protection under The Conservation of Species and Habitats Regulations 2017 and Conservation of Offshore Marine Habitats and Species Regulations 2017.
Generation Assets	The generation assets associated with the Morgan Offshore Wind Project and the Morecambe Offshore Windfarm include the offshore wind turbines, inter-array cables, offshore substation platforms and platform link (interconnector) cables to connect offshore substations.
Greenhouse gas	A gas that absorbs and emits radiant energy within the thermal infrared range, causing the greenhouse effect. Examples include carbon dioxide and methane.
Habitats Regulations	The Conservation of Habitats and Species Regulations 2017 (as amended) and the Conservation of Offshore Marine Habitats and Species Regulations 2017 (as amended).
Kyoto Protocol	The Kyoto Protocol is an international agreement linked to the United Nations Framework Convention on Climate Change, which commits its parties to reducing greenhouse gas emissions by setting internationally binding emission reduction targets, implemented primarily through national measures but also via wider market-based mechanism.
Landfall	The area in which the offshore export cables make landfall (come on shore) and the transitional area between the offshore cabling and the onshore cabling. This term applies to the entire landfall area at Lytham St. Annes between Mean Low Water Springs and the transition joint bay inclusive of all construction works, including the offshore and onshore cable routes, intertidal working area and landfall compound(s).
Local Planning Authority	The local government body (e.g., Borough Council, District Council, etc.) responsible for determining planning applications within a specific area.

Term	Meaning
Marine licence	The Marine and Coastal Access Act 2009 requires a marine licence to be obtained for licensable marine activities. Section 149A of the Planning Act 2008 allows an applicant for to apply for 'deemed marine licences' in English waters as part of the development consent process.
Morecambe OWL	Morecambe Offshore Windfarm Ltd is a joint venture between Cobra Instalaciones y Servicios, S.A. (Cobra) and Flotation Energy Ltd.
Morgan and Morecambe Offshore Wind Farms: Transmission Assets	<p>The offshore export cables, landfall and onshore infrastructure for the Morgan Offshore Wind Project and the Morecambe Offshore Windfarm. This includes the offshore export cables, landfall site, onshore export cables, onshore substations, 400 kV grid connection cables and associated grid connection infrastructure such as circuit breaker compounds.</p> <p>Also referred to in this report as the Transmission Assets, for ease of reading.</p>
Morgan OWL	Morgan Offshore Wind Limited is a joint venture between bp Alternative Energy investments Ltd. and Energie Baden-Württemberg AG (EnBW).
National Policy Statement(s)	The current national policy statements published by the Department for Energy Security and Net Zero in 2023.
Planning Inspectorate	The agency responsible for operating the planning process for applications for development consent under the Planning Act 2008.
Protected species	A species of animal or plant which it is forbidden by law to harm or destroy.
Ramsar sites	Wetlands of international importance that have been designated under the criteria of the Ramsar Convention. In combination with Special Protection Areas and Special Areas of Conservation, these sites contribute to the national site network.
Renewable energy	Energy from a source that is not depleted when used, such as wind or solar power.
Special Areas of Conservation	A site designation specified in the Conservation of Habitats and Species Regulations 2017. Each site is designated for one or more of the habitats and species listed in the Regulations. The legislation requires a management plan to be prepared and implemented for each SAC to ensure the favourable conservation status of the habitats or species for which it was designated. In combination with Special Protection Areas and Ramsar sites, these sites contribute to the national site network.
Special Protection Areas	A site designation specified in the Conservation of Habitats and Species Regulations 2017, classified for rare and vulnerable birds, and for regularly occurring migratory species. Special Protection Areas contribute to the national site network.
The Secretary of State for Energy Security and Net Zero	The decision maker with regards to the application for development consent for the Transmission Assets.
Transmission Assets	See Morgan and Morecambe Offshore Wind Farms: Transmission Assets (above).

1 Applicants' response to Relevant Representations

1.1 Introduction

1.1.1.1 Following closure of the relevant representation period under Section 56 of the Planning Act 2008 for the Morgan and Morecambe Offshore Wind Farms: Transmission Assets (referred to as 'the Transmission Assets') (the Applicants), the Applicants have taken the opportunity to review each of the Relevant Representations (RRs) received from stakeholders who registered as Interested Parties in the examination.

1.1.1.2 Table 2.1 provides an overview of the Applicants' response to Relevant Representation of Lancashire County Council (RR-1262).

2 Responses to Relevant Representations

2.1 Lancashire County Council

Table 2.1: RR-1262– Lancashire County Council

Reference	Relevant Representation Comment	Applicants' response
RR-1262 1262.1	The County Council recognises the national benefit of this project in terms of energy security, meeting renewable energy targets, and creating sustainable economic growth in Lancashire. However, it is important that this is achieved without significant damage to the local built and natural environment, local communities and the tourist economy. The local impacts of the project and their cumulative impacts should be considered and adequately addressed by the applicant.	The Applicants note the Relevant Representation from Lancashire County Council and acknowledge the concerns raised.
RR-1262 1262.2	<p>A significant amount of additional information was provided in December 2024, which is an update on the initial proposal and a number of LCC officers/members have been briefed on the project by the applicant's representatives, primarily through overview presentations describing the project.</p> <p>To support the successful delivery of this project, the process should be front loaded to allow the likely effects of the project to be fully consulted on, with the design of the project evolving up to the point of application submission and be proportionate to the nature of that proposed, not being burdensome for the applicant, consultees, and the communities affected by the proposal.</p>	<p>The Applicant is committed to continuing to work with Lancashire County Council.</p> <p>Through the development phase of the Transmission Assets the Applicants held Expert Working Group (EWG) meetings as set out in The Technical Engagement Plan (APP 189) and its appendices (APP 190-192).</p> <p>Lancashire County Council were participants in these meetings, relevant to their statutory remit, as set out in sections 1.2.6, 1.2.7, 1.2.9 and 1.4.3 of The Technical Engagement Plan (APP189).</p> <p>The Applicants have subsequently met with Lancashire County Council on both the 12th March and h and 7th April with regard to Traffic and Transport matters. The Applicants will prepare Statements of Common Ground to discuss matters specifically in relation to Lancashire County Council's</p>

Reference	Relevant Representation Comment	Applicants' response
	<p>However, the requisite detail for a project of this scale has not been discussed, described or agreed on, including how the approach will work. The County Council needs certainty that all impacts can and will be adequately addressed by the applicant</p> <p>It is disappointing that key aspects of the applicant's approach were unmalleable prior to the applicant's Preliminary Environmental Information Report being produced, as LCC fully embrace collaboration, want to provide support, and have the benefit of local knowledge and providing vital public services. Unfortunately, with the approach taken by the applicant to this project, there has been limited cooperation to address concerns. This is very disappointing. However, the County Council remains supportive of a close working arrangement, to resolve the issues that are contained in these comments and others that may arise as the project progresses.</p> <p>It is noted that some of the updated information is a positive update since the draft documents were considered, such as the width of cable route construction corridor reducing from 122m to 100m. However, the Morgan substation footprint has increased significantly from 125,000m² to 164,000m².</p>	<p>concerns and is confident that these matters can either be agreed and / or adequately addressed through the Examination.</p> <p>The Applicants highlight that as stated in paragraph 3.7.2.13 of the Transmission Assets Description (AS-024) although the total area for the Morgan onshore substation has increased, the increase in area is to provide adequate space for landscaping, environmental mitigation and biodiversity benefit. Additional area has also been provided for drainage and water attenuation.</p>
RR-1262 1262.3	<p>Alternative cable routes to the National grid substation at Penworthan</p> <p>It is noted that the only requirement from the then NGENSO (NESO since Nov 2024) was to connect to the national grid transmission network at Penwortham.</p>	<p>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</p>

Reference	Relevant Representation Comment	Applicants' response
	<p>Work has been undertaken by the applicant to consider local alternative locations for some infrastructure and routeing. However, this is isolated to the local area with an offshore search extent of Formby to Blackpool. This does not preclude a wider extent to be fully explored to ensure the solution that is delivered is the most appropriate having regard to impacts on communities, business, tourism and farmland, and damage to ecology/landscape/archaeology as well as cost. For example, this current extent excludes other opportunities further north by connecting into existing overhead infrastructure elsewhere (i.e. in the Lancaster area which has direct link to Penwortham).</p> <p>As presented, there are deficiencies with that proposed as other suitable options to the proposed routeing have not been considered and reviewed.</p>	<p>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.</p> <p>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).</p> <p>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, TCE and NESO, which confirms that the HND needed to consider cost, deliverability and operability, environmental impacts and community impacts on an equal footing.</p>

Reference	Relevant Representation Comment	Applicants' response
		<p>A key recommendation of the HND process for the Morgan Offshore Wind Project and the Morecambe Offshore Windfarm is stated below:</p> <p>“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.”</p> <p>See Figures 11 and 28 of the HND.</p> <p>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:</p> <p>“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.</p> <p>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</p>

Reference	Relevant Representation Comment	Applicants' response
		<p>and relevant in the consideration of applications for infrastructure resulting from those exercises.</p> <p>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.</p> <p>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.”</p> <p>See also paragraph 2.15:</p> <p>‘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.’</p> <p>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</p>

Reference	Relevant Representation Comment	Applicants' response
		<p>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:</p> <ol style="list-style-type: none"> 1. "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. In contrast, Penwortham had a more accessible footprint, fewer constraints, and better electrical connectivity to the wider network". <p>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.</p> <p>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.</p>

Reference	Relevant Representation Comment	Applicants' response
		<p>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.</p>
RR-1262 1262.4	<p>Cumulative Impacts</p> <p>The cumulative impacts have not been adequately assessed within the application, nor has adequate evidence presented to support the approach.</p> <p>Despite the assessments within the Environmental Statement identifying residual impacts from the project regarding landscape and visual effects, ecology and setting of heritage assets, no mitigation nor compensation has been actively discussed nor agreed.</p> <p>Impact on the highway and highway assets has not been adequately considered, nor has there been agreement of any pre-commencement works (to ensure the highway network can be made suitable for its intended use), nor agreement regarding funding/repair of damage caused to public infrastructure by this project. Safe delivery of the proposal remains the priority for these types of schemes, to limit adverse impacts. As these discussions have not been progressed there is inadequate assurance regarding mitigation, reinstatement of highway assets post-development, nor mechanism of delivery (such as s106, UU, s278 or s59).</p>	<p>The Applicants note that all topic impact assessments have appropriately considered potential cumulative effects with other projects in the vicinity. Volume 1, Annex 5.5: Cumulative screening matrix and location plan (APP-039) outlines the methodology for identification of cumulative projects for consideration and identifies where cumulative impacts have the potential to give rise to likely significant effects for specific impact assessments topic areas with spatial or temporal overlap. Further detail is provided on this matter in the Rule 9 – ES Assessment of Construction Scenarios document (AS-070).</p> <p>Section 5.4.9 of Volume 1, Chapter 5: Environmental assessment methodology (APP-034) sets out the cumulative assessment methodology, which is then followed in each of the technical chapters within the Environmental Statement. The Applicants maintain that an adequate cumulative assessment has been undertaken.</p> <p>With regard to residual effects on heritage assets, section 5.11 of Volume 3, Chapter 5: Historic environment identifies that the only identified residual effects are in relation to the impact of the Transmission Assets onshore works on the character of the historic landscape. These impacts are up to minor adverse but are permanent, which is not significant. Further mitigation comprises the preparation of an Outline Landscape Management Plan which would further reduce the overall impact and</p>

Reference	Relevant Representation Comment	Applicants' response
		<p>effect, however, the residual effect will remain unchanged. The Applicants have made a commitment (CoT15 of Volume 1, Annex 5.3: Commitments Register of the ES (AS-030)) to develop Detailed Landscape Management Plan(s) in line with the submitted Outline Landscape Management Plan (AS-050). This is secured by Requirement 6 within Schedules 2A & 2B of the draft Development Consent Order (AS-004). Detailed Landscape Management Plan(s) will be implemented by the Applicants as approved by relevant local authorities in consultation with stakeholders, as appropriate. No residual cumulative impacts have been identified.</p> <p>With regard to residual effects on ecology, Volume 3, Chapter 3: Onshore ecology and nature conservation identifies that the only moderate adverse residual effect is with regard to habitat loss at Mill Brook Valley Biological Heritage Site (BHS). The area at the BHS is to be used for temporary construction compounds and the habitat would be reinstated following the completion of the works, however, a precautionary approach has been applied to the assessment due to the risk that habitat of comparable value cannot be provided and maintained in the long term. An Outline Ecological Management Plan (APP-212) has been submitted and the Applicants have made a commitment (CoT76 of Volume 1, Annex 5.3: Commitments Register of the ES (AS-030)) to develop Detailed Ecological Management Plan(s) will include details on any long term mitigation and management measures relevant to onshore ecology and nature conservation. This will include the management of ecological mitigation areas. 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 relevant local authorities in consultation with stakeholders, as appropriate. For cumulative the same residual effects is identified and management via the same process.</p> <p>Regarding mitigation of potential landscape and visual effects, the above plans are also relevant and secured in the same manner. Landscape and visual effects regarding the onshore substations are also secured via the</p>

Reference	Relevant Representation Comment	Applicants' response
		<p>Outline Design Principles (APP-209) (secured under Requirement 6 of the draft DCO (AS-004)).</p> <p>The Applicants are confident that the Statement of Common Ground process that will continue through the Examination phase will provide the appropriate forum to actively discuss and agree any additional proportionate mitigation with Lancashire County Council for residual effects concluded within the Cumulative Effects Assessments.</p> <p>Impacts on the highway and highway assets have been assessed within Volume 3, Chapter 7: Traffic and transport (APP-108). Mitigation identified in relation to potential effects on the highway and highway assets, agreements on pre-commencement works (i.e. onshore site preparation works), or agreements regarding public infrastructure are considered within the outline Construction Traffic Management Plan (APP-211) and outline Highway Access Management Plan (AS-052). Lancashire County Council (along with Blackpool Borough Council) is identified as the designated local highway authority and therefore a discharging authority in relation to these documents at the detailed design stage post-consent. No stage of the onshore works may commence until the appropriate management plan(s) have been submitted to and approved by the relevant highway authority. These commitments are secured within Requirement 9 and Requirement 10 of Schedules 2A and 2B of the draft Development Consent Order (AS-004).</p>
RR-1262 1262.5	<p>Socio-Economic</p> <p>The County Council seeks a commitment or a Memorandum of Understanding to establish and maximise the education, employment, and skill development opportunities from this project. It is important that the economic benefits of the project are maximised</p>	<p>Employment and Skills Plan(s)</p> <p>Requirements to secure opportunities in relation to employment and skills have been provided in Requirement 19 of Schedules 2A and 2B to the draft Development Consent Order (DCO) (AS-004). Detailed Employment and Skills Plan(s) will be produced prior to construction, in accordance with the Outline Employment and Skills Plan (APP-239). The detailed Employment and Skills Plan(s) will set out further information on how the Applicants will</p>

Reference	Relevant Representation Comment	Applicants' response
	<p>and utilise a local supply chain to promote sustainable economic growth.</p> <p>There are concerns that the impacts on tourism have not been adequately addressed within the submissions. There are high numbers of visitors through the year to the whole Fylde coast. It is essential that the proposal considers time periods where there are likely to be large numbers of visitors (i.e. Lytham Festival, Golf Tournaments, Blackpool Illuminations, etc.), and works to limit impacts during periods of higher demand.</p>	<p>engage with local workers and training providers for anticipated employment opportunities associated with the Transmission Assets.</p> <p>The Applicants consider that through the inclusion of Requirement 19 of Schedules 2A and 2B within the draft DCO (AS-004) a robust approach to ensuring measures in relation to employment and skills has been provided.</p> <p>Tourism</p> <p>Potential indirect impacts on the visitor economy have been assessed within the North West England study area (refer to section 2.4.5 of Volume 4, Chapter 2: Socio-economics (APP-141)). The assessment considers interactions between the visitor economy and potential visual impacts and recreation uses.</p> <p>The only long term potential for significant effects on visual amenity would be effects on equestrians and walkers using the linked Public Right of Way (PRoW) immediately adjacent and near to the Morgan and Morecambe onshore substation sites (set out within Volume 4, Chapter 1: Landscape and visual resources (APP-123)). Within the context of the North West England visitor economy, the magnitude of impact on visual receptors is assessed to be negligible. It is reasonable to assume such an isolated long term impact would also be considered as negligible within the wider context of the Fylde visitor economy.</p> <p>Volume 3, Chapter 6: Land use and recreation (APP-104) assesses the significance of the temporary impact on the recreational use of coastal areas, other Public Rights of Way, and the temporary impact on the recreational use of recreational resources. The assessment concludes that during the construction, operation and maintenance and decommissioning phases, potential effects will be of no more than minor adverse significance,</p>

Reference	Relevant Representation Comment	Applicants' response
		which is not significant in Environmental Impact Assessment terms. There are therefore unlikely to be any significant effects on tourism in North West England associated with impacts on recreation as a result of the Transmission Assets.
RR-1262 1262.6	Air Quality It is not apparent that air quality impact has been satisfactorily considered, having full regard to increases as a consequence of construction and traffic movements. Suitable mitigation must be agreed to minimise adverse impacts on air quality. A Requirement is recommended to continuously review air quality monitoring data and proactively manage construction traffic to minimise exceedance risks.	<p>Volume 3, Chapter 9: Air quality (APP-121) considers the potential impacts from construction dust and construction traffic emissions and makes recommendations for appropriate mitigation measures where required. The assessment follows best practice guidance and concludes that with the implementation of recommended mitigation measures the effects will not be significant in Environmental Impact Assessment (EIA) terms. With regard to a continuous review of air quality monitoring data, Section 9.11.4 of Volume 3, Chapter 9: Air quality (APP-121) concludes that with appropriate mitigation measures from the Guidance on the assessment of dust from demolition and construction (IAQM, 2014), the air quality effects arising from dust are not expected to be significant. In addition, the results of modelling of traffic-related emissions show that the impacts are negligible. Therefore, in both instances monitoring is not required.</p> <p>The relevant mitigation measures are set out within the Outline Dust Management Plan (APP-195) and Outline Pollution Prevention Plan (APP-197) is secured by Requirement 8 of Schedule 2A and Schedule 2B, Code of Construction Practice within the draft DCO (AS-004).</p> <p>There is no need to add an additional requirement concerning construction traffic as construction traffic will be managed as outlined in the Outline Construction Traffic Management Plan (APP-211). The detailed Construction Traffic Management Plan(s) are secured via Requirement 9 of the draft DCO (AS-004).</p>
RR-1262 1262.7	Noise and Vibration	<p>Volume 3, Chapter 8: Noise and vibration of the Environmental Statement (APP-117) presents the potential impacts and effects predicted to result from construction noise, construction vibration and construction traffic</p>

Reference	Relevant Representation Comment	Applicants' response
	Noise and vibration has not been satisfactorily considered, having full regard to increases as a consequence of construction and traffic movement. Suitable mitigation must be agreed to ensure that noise and vibration levels are acceptable. A Requirement is recommended to continuously review noise and vibration levels and proactively manage construction traffic and construction to minimise impacts. This also includes the limited nighttime works required for cable pulling.	<p>noise from the concurrent construction of the Transmission Assets (as the worst-case). The assessment has been undertaken in accordance with best practice guidance adopted on projects of a similar nature.</p> <p>The Applicants confirm that outline measures to manage construction noise and vibration are set out within the outline Construction Noise and Vibration Management Plan (oCNVMP) (APP-196). Provision of detailed Construction Noise and Vibration Management Plan(s), which must be prepared and approved by the relevant planning authority (in consultation with key stakeholders) is secured by Requirement 8 of Schedule 2A and Schedule 2B of the draft Development Consent Order (AS-004). This includes the approach to managing specific works to be undertaken outside of construction working hours (as secured by Requirement 14 of Schedule 2A and Schedule 2B of the draft Development Consent Order (AS-004)). Detailed mitigation measures will be defined during detailed design phase and will be set out in detailed CNVMP(s), the latter being secured by Requirement 8 (Code of Construction Practice) of the draft DCO (AS-004). These plans will be submitted to and approved by the relevant planning authority in consultation with other stakeholders, including Lancashire County Council, where relevant.</p> <p>The Applicants also confirm that construction traffic will be managed in accordance with the outline Construction Traffic Management Plan (APP-211). The detailed Construction Traffic Management Plan(s) are secured via Requirement 9 of the draft DCO (AS-004).</p>
RR-1262 1262.8	<p>Public Rights of Way (PROW)</p> <p>The impact on the PROW network and its users has not been satisfactorily considered. As presented, the documentation makes no commitment and does not have regard to the needs of the community, but only provides a process regarding changes and closures.</p>	Where possible, the Applicants have sought to avoid potential impacts on the PROW network, either via the design of the Transmission Assets or via the commitment to utilise trenchless techniques, which avoids the requirement for the temporary stopping up and/or diversion of affected routes, in certain locations (CoT44, secured through Requirement 8 of Schedules 2A & 2B of the draft DCO, and CoT90 which is secured through Requirement 5(3) of Schedule 2A & 2B of the draft DCO (AS-004)).

Reference	Relevant Representation Comment	Applicants' response
	<p>It is unclear which rights of way will be open, diverted or closed, nor whether alternative routes are available. For example where a PROW crosses a haul road, the proposed strategy is unclear.</p> <p>The principles need to be agreed at this stage. It must be ensured safety is not compromised, and public inconvenience must be considered and minimised rather than accepted without mitigation.</p>	<p>Where avoidance has not been possible, suitable outline management measures have been proposed as part of the Outline PROW Management Plan (APP-048) to maintain access to the PROW network and the safety of users during construction, of the Transmission Assets, including managed crossings, a single temporary diversion and two permanent gated crossings. No management of PROW will be required during the operation and maintenance phase of the Transmission Assets. The PROWs that will remain open (i.e., unaffected) during construction of the Transmission Assets are set out in Table 1.2 of the Outline PROW Management Plan (APP-048) and comprise routes where trenchless techniques are proposed, and no management is required (e.g., 5-2-BW 16).</p> <p>Only a single PROW is expected to be temporarily diverted during construction of the Transmission Assets, bridleway 5-5-BW 16. The nature of the proposed temporary diversion of bridleway 5-5BW 16 is described in section 1.5.6 and summarised in Table 1.2 of the Outline PROW Management Plan (APP-048). The existing route of bridleway 5-5-BW 16 and the proposed indicative diversion (5a-5b) are presented in Figure 1.5 of the Outline PROW Management Plan (APP-048). There is no requirement for the permanent stopping of any PROW as a result of the Transmission Assets.</p> <p>The potential impacts of the Transmission Assets on PROW, including public footpaths and bridleways and other promoted routes are assessed in section 6.11 of F3.6 Volume 3, Chapter 6: Land use and recreation (APP-104). This includes consideration of the commitment to utilise trenchless techniques and outline management measures set out in the Outline PROW Management Plan (APP-048).</p> <p>The outline management measures proposed for each of the affected PROW within the Onshore Order Limits were presented to Lancashire County Council as part of an EWG held in September 2024 prior to submission of the DCO application, with feedback received used to inform</p>

Reference	Relevant Representation Comment	Applicants' response
		<p>relevant sections of the Outline PRoW Management Plan (APP-048.) Details of the meeting can be found within section 1.4.4. of The Technical Engagement Plan (APP 189).</p> <p>Impacts to PRoW will be controlled during the construction phase through the Outline PRoW Management Plan (APP-048), which form part of the CoCP. The CoCP is secured by Requirement 8 of Schedules 2A and 2B of the draft DCO (AS-004). Detailed PRoW Plan(s) will be implemented as approved by the relevant local planning authorities.</p>
RR-1262 1262.9	<p>Flood risk</p> <p>Flooding in Lancashire is a significant issue, with flooding of land, properties and highway now occurring more frequently. Significant areas of land around West Lancashire, the Fylde, and Wyre are predisposed to flooding in wet seasons, with a higher occurrence in areas which are low lying. The information within the application is not sufficient to determine how the proposed development would interact with existing land, and its consequential impacts on properties and the highway network in terms of areas of existing flood risk and areas affected by surface water flooding. It is considered that this issue needs to be fully addressed by the applicant with further documentation produced that can be reviewed.</p>	<p>The Applicants have made a commitment (CoT12 of Volume 1, Annex 5.3: Commitments Register of the ES (AS-030)) to completely bury the onshore export cables and the 400 kV grid connection cables underground. This is secured by Schedule 1, Part 1 of the draft Development Consent Order (AS-004). As cables are to be buried below ground, no surface water runoff from these elements to the surrounding environment will occur.</p> <p>Due to the negligible increases in impermeable area associated with the onshore export cable corridor and 400 kV grid connection cable (associated with transition joint bay and link box covers) only negligible increases in surface water runoff will occur. As a result, new impermeable areas associated with these aspects of the Transmission Assets will not increase flood risk during the operational and maintenance phase and no drainage to mitigate surface water runoff will be required.</p> <p>A site-specific FRA has been undertaken (AS-040, AS-042 and AS-044) in accordance with NPS EN-1, the National Planning Policy Framework and associated Planning Practice Guidance and has been undertaken for a Maximum Design Scenario for the Transmission Assets. Taking into account commitments proposed (APP-024), sections 1.5.11, 1.6.11 and 1.7.11 of Volume 3, Annex 2.3: Flood risk assessment (Parts 1 to 3 (AS-040, AS-042 and AS-044)) conclude that the Transmission Assets have a</p>

Reference	Relevant Representation Comment	Applicants' response
		<p>low to very low risk of flooding from all assessed sources and flood risk will not be increased as a result of development.</p> <p>The Applicants have made a commitment (CoT35 of Volume 1, Annex 5.3: Commitments Register of the ES (AS-030)) to implement Detailed Code of Construction Practice(s) (CoCP) in line with the Outline CoCP (APP-202). This would include measures regarding water environment and drainage including Detailed Surface and Groundwater Management Plan(s) in accordance with Outline Surface and Groundwater Management Plan (APP – 202) which includes information for managing surface water runoff during construction. This is secured by Requirement 8 within Schedules 2A & 2B of the draft Development Consent Order (AS-004). Detailed CoCP(s) will be implemented by the Applicants as approved by relevant local authorities in consultation with stakeholders, as appropriate.</p> <p>The impact of increased surface water flood risk as a result of higher rates of surface water runoff from additional impermeable areas is assessed within section 2.11.3. of Volume 3, Chapter 2: Hydrology and flood risk (APP-070). Taking into consideration the mitigation measures that have been committed to, the magnitude of the impact is deemed to be negligible adverse and the sensitivity for the study area is considered to be high. The effect will, therefore, be of minor adverse significance, which is not significant in Environment Impact Assessment (EIA) terms. The Outline Operational Drainage Management Plan (APP-215) sets out how surface water from within the onshore substations will be managed to mitigate any increase flood risk during the operational and maintenance phase. Measures will include the use of Sustainable Drainage Systems (SuDS) in line with the SuDS hierarchy of prevention, source control, site control and regional control. In the case of the Transmission Assets, separate attenuation ponds would be used at each of the onshore substations and controlled outfalls from each of these ponds would be into the Dow Brook. This will ensure that flows from impermeable areas within each substation site will be restricted to the 1 in 2-year greenfield runoff rate. The</p>

Reference	Relevant Representation Comment	Applicants' response
		<p>Applicants have made a commitment (CoT11 of Volume 1, Annex 5.3: Commitments Register of the ES (AS-030)) to develop Detailed Operational Drainage Management Plan(s) will be prepared in accordance with the Outline Operational Drainage Management Plan (APP-215). This will include measures to limit discharge rates and attenuate flows to maintain greenfield runoff rates at the onshore substations. This is secured by Requirement 20 within Schedules 2A & 2B of the draft Development Consent Order (AS-004). Detailed Operational Drainage Management Plan(s) will be implemented by the Applicants as approved by relevant local authorities in consultation with stakeholders, as appropriate.</p> <p>The Applicants have made a commitment (CoT84 of Volume 1, Annex 5.3: Commitments Register of the ES (AS-030)) to develop Detailed CoCP(s) in line with the Outline CoCP (APP-202). This includes field drainage plans which will be developed in consultation with the relevant landowners. If required, additional field drainage will be installed to ensure the existing drainage of the land is maintained during and after construction. This is secured by Requirement 8 within Schedules 2A & 2B of the draft Development Consent Order (AS-004). Detailed CoCP(s) will be implemented by the Applicants as approved by relevant local authorities in consultation with stakeholders, as appropriate.</p>
RR-1262 1262.10	Changes are needed to the wording of the Development Consent Order to satisfy the Lead Local Flood Authority (LLFA)	The Applicants met with the LLFA on 17 January 2025 and will continue to proactively engage with them to progress ongoing discussions in relation the protective provisions. The Applicants have now provided a revised set of protective provisions to the LLFA further to this meeting and the Applicants anticipate being in a position to include updated protective provisions in the draft DCO (AS-004) during Examination.

Reference	Relevant Representation Comment	Applicants' response
RR-1262 1262.11	There are inconsistencies in the submissions which require addressing	The Applicants met with LCC on the 12 th March and 7 th April to understand their concerns and are currently working to address these and update any submissions, where relevant.
RR-1262 1262.12	There is further evidence required to satisfy the LLFA, and clarity is required to provide assurance to the LLFA that the impacts will be suitably addressed.	The Applicants note the concerns raised by the LLFA and is committed to continuing to work with them. The Applicants last met with the LLFA on 17th January 2025 to progress ongoing discussions and have requested a follow-on meeting to further discuss address their concerns. The Applicants are confident that all matters can either be agreed and / or adequately addressed through the Examination.
RR-1262 1262.13	Ecology The County Council is concerned that there are some ecological receptors which have not been fully assessed and/or have insufficient mitigation/compensation measures identified within the Environmental Statement and secured within the draft Development Consent Order (DCO). These include: <ul style="list-style-type: none"> • The impact on bats, • Hedgerows (including its removal) • Woodlands and trees (including their removal both prior to and during construction • Impacts on over-wintering birds associated with coastal European level wildlife sites in this area. 	<p>The Applicants are confident that the assessment of ecological receptors is robust, precautionary and has identified sufficient and appropriate mitigation measures.</p> <p><u>Bats</u></p> <p>The potential impacts on bats have been assessed using data from record centres and data collected by the Applicants from 2022-2024 surveys (APP-084 and APP-085) and as set out in Section 3.11.11 of Volume 3, Chapter 3: Onshore Ecology and Nature Conservation (APP-075). Potential impacts to bats will be mitigated during the construction phase through the measures set out in the Outline Ecological Management Plan (EMP) (APP-212). Mitigation measures relating to bats include; pre-construction surveys to inform the detailed EMP(s) and the installation of bat boxes and the installation of suitably sized culverts. The detailed EMP(s) are secured by Requirement 12 of Schedules 2A and 2B of the draft DCO (AS-004). Detailed EMP(s) will be implemented as approved by the relevant local planning authorities in consultation with Natural England. Taking account these measures, the assessment concluded that the</p>

Reference	Relevant Representation Comment	Applicants' response
		<p>impact would be minor adverse which is not considered significant in Environmental Impact Assessment (EIA) terms.</p> <p><u>Hedgerows</u></p> <p>The potential impact on hedgerows as a result of the Transmission Assets has been assessed in Sections 3.11.10 and 3.13.7 of Volume 3, Chapter 3: Onshore Ecology and Nature Conservation (APP-075). The assessment concluded that the impacts relating to the loss of hedgerows would all be minor adverse which is not considered significant in EIA terms.</p> <p>The Applicants have made a commitment (CoT13 of Volume 1, Annex 5.3: Commitments Register of the ES (AS-030)) that sections of hedgerows and trees which are removed will be replaced using like to like hedgerow species, subject to landowner agreement. This is secured by Requirement 12 within Schedules 2A & 2B of the draft Development Consent Order (AS-004). Detailed EMP(s) will be implemented by the Applicants as approved by local planning authorities in consultation with Natural England.</p> <p><u>Woodlands and trees</u></p> <p>The potential impacts on woodlands as a result of the Transmission Assets has been assessed in Sections 3.11.6 and 3.11.7 Volume 3, Chapter 3: Onshore Ecology and Nature Conservation (APP-075). The main area of woodlands within the Transmission Assets Order Limits is Masons Wood BHS, however the Applicants have committed to utilising trenchless techniques to install the 400kV grid connection cables at this location, and so it will not be directly impacted by the Transmission Assets. The assessments concluded that the impacts relating to the loss of woodlands would be no change to minor adverse which is not considered significant in EIA terms.</p> <p>With regard to trees, section 1.9.5 of Volume 3 Annex 10.5: Tree survey and arboricultural impact assessment – Parts 1 and 2 (APP-128 and APP-129) includes an assessment of potential impacts from tree removal. Micro-</p>

Reference	Relevant Representation Comment	Applicants' response
		<p>siting will be used within the Onshore Infrastructure Area wherever practicable. During detailed design, options will be explored to limit conflicts with the root protection areas and maximise tree retention. Whilst some tree loss will occur within the onshore substations works areas, the retention of high-quality trees will be targeted, where achievable.</p> <p><u>Over-wintering birds</u></p> <p>The majority of potential impacts associated with the construction of the Transmission Assets will be temporary and minimal, with some permanent habitat loss which will be mitigated through the provision of a permanent high tide roost at Fairhaven saltmarsh and permanent mitigation area south of Newton-with-Scales (for waders and farmland birds. These are outlined in the Outline Ecological Management Plan (EMP) (APP-212). The Applicants have made a commitment (CoT113 of Volume 1, Annex 5.3: Commitments Register of the ES (AS-030)) to the provision of mitigation measures at Fairhaven saltmarsh where construction activities are undertaken in the intertidal area to reduce disturbance upon roosting wader features of Ribble and Alt Estuary SPA. 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 relevant local authorities in consultation with Natural England, as appropriate. In addition, the Applicants have made a commitment (CoT120 of Volume 1, Annex 5.3: Commitments Register of the ES (AS-030)) to the provision of mitigation areas south of Newton-with-Scales to mitigate potential permanent habitat loss with each of the onshore substations. Measures may include the creation of scrapes and thickening of hedgerows. 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 relevant local authorities in consultation with Natural England, as appropriate.</p>

Reference	Relevant Representation Comment	Applicants' response
		<p>The potential impacts upon each qualifying feature of the local designated sites has been properly assessed using data from records centres and site-specific surveys. The impacts have been mitigated in all stages of the development and have been avoided where possible. Specific assessments for wintering birds can be found in the following reports; Volume 3, Annex 4.2: Wintering and migratory birds technical report – Part 1 and 2 (APP-092 and APP-093).</p>
RR-1262 1262.14	<p>Ecology</p> <p>In addition to these areas, the Council is disappointed with the lack of understanding of local ecological designations and features of interest. This includes the impacts on a farmland compensation area which was necessary to mitigate SPA impacts for a development at Queensway, Lytham.</p>	<p>As outlined in Section 3.7.2 of Volume 1, Chapter 3: Project description (AS-024) and Section 4.6.3 of Volume 1, Annex 4.3: Site selection and refinement of the onshore infrastructure (AS-028), at PEIR two cable onshore export cable corridor route options (Option 1 north and Option 2 south) were included in the Lytham Moss and Higer Ballham area. A BRAG analysis was undertaken (see Table 4.14 of AS-028 which considered ecological designations). In addition, following feedback from the Section 42 consultation feedback on these two route options through the Lytham Moss and Higer Ballham area, the southern option which passed through to the south of Higher Ballham was removed to mitigate potential impacts related to ornithology on the Farmland Conservation Area as far as practicable.</p> <p>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. This is secured by Requirement 12 within</p>

Reference	Relevant Representation Comment	Applicants' response
		Schedules 2A & 2B of the draft Development Consent Order (AS-004). Detailed EMP(s) will be implemented by the Applicants as approved by local planning authorities in consultation with Natural England.
RR-1262 1262.15	Ecology The impacts on this sensitive area will be long lasting, there is limited commitment to biodiversity net gain, and this needs to be fully addressed by the applicant with further documentation produced for review.	A detailed assessment of the potential impacts of the Transmission Assets on ecology and nature conservation are set out in Section 3.11 of Volume 3, Chapter 3: Ecology and Nature Conservation (APP-075). As set out in the Onshore Biodiversity Benefit Statement (AS-054), 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. 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 in accordance with NPS EN-1 paragraph 4.6.6 (which encourages Energy NSIP proposals to seek opportunities to provide net gains for biodiversity where possible) and considers its proposals are reasonable and proportionate.
RR-1262 1262.16	Ecology There are also significant issues regarding the quality of the ecological surveys that have been undertaken as part of the Environmental Assessment.	The Applicants welcome further feedback form Lancashire County Council. The surveys were undertaken in accordance with Volume 3, Annex 3.4: Onshore ecology and nature conservation survey methodologies (APP-076). A sufficient level of survey coverage has been achieved to inform and complete the robust assessment of ecological receptors. The survey coverage was discussed with members of the Onshore ecology, onshore and intertidal ornithology EWG on 31 May 2024 and a

Reference	Relevant Representation Comment	Applicants' response
		technical note was issued for feedback. No feedback was received from Lancashire County Council. Further details regarding the technical engagement can be found in Section 1.2.5 of the Technical Engagement Plan (APP-189).
RR-1262 1262.17	Archaeology <p>The submitted information falls short of the level of detail required by the County Archaeologists. The development needs to identify areas of the proposed route that may have greater archaeological potential include provision for a greater level of archaeological researching and excavation if required. This needs to be fully addressed by the applicant with further documentation produced for review.</p>	<p>The application documents present information regarding known and potential archaeological sites and deposits within the Order Limits. Information gained through desk-based research is set out in ES Volume 3, Annex 5.1: Historic environment desk-based assessment (APP-097) and ES Volume 3, Annex 5.4: Geoarchaeological desk-based assessment (APP-101). Additional information acquired through fieldwork undertaken specifically for the Transmission Assets is set out in ES Volume 3, Annex 5.2: Onshore archaeological geophysical survey report (APP-098 and APP-099) and ES Volume 3, Annex 5.6: Interim trial trenching report (APP-103). The information provided within the aforementioned application documents (APP-098, APP-099 and APP-103) enabled a robust and precautionary assessment to be undertaken.</p> <p>The County Archaeologist will be consulted on all further archaeological investigations to be undertaken by the Applicants, to obtain their approval on the location and methodologies. The Outline Onshore and Intertidal Written Scheme of Investigation (APP-214) sets out the basis for any further archaeological and geoarchaeological investigations that may be required before the commencement of construction. Paragraph 1.5.1.1 explains that the programme of post-consent archaeological and geoarchaeological work will initially comprise further geophysical survey and trial trenching of land within the Onshore Infrastructure Area. This work will cover any areas where geophysical survey and/or trial trenching has not been undertaken previously.</p> <p>Paragraph 1.5.1.2 of the Outline Onshore and Intertidal Written Scheme of Investigation (APP-214) set of the process through which further archaeological investigations will be agreed and undertaken. This process</p>

Reference	Relevant Representation Comment	Applicants' response
		<p>includes consultation with the Historic Environment Team at Lancashire County Council in order to determine the number and locations of the areas where detailed archaeological investigation is required. The implementation of the programme of work set out the Outline Onshore and Intertidal Written Scheme of Investigation (APP-214) is secured through Requirement 11 in Schedules 2A and 2B in the Draft Development Consent Order (APP-005).</p> <p>The Applicants will continue to liaise with the Historic Environment Team at Lancashire County Council and will provide any updates at the next iteration of the Outline Onshore and Intertidal Written Scheme of Investigation (APP-214).</p>
RR-1262 1262.18	<p>Landscape</p> <p>The proposal must allow an accurate assessment of its landscape impacts particularly in terms of the removal of key landscape features such as trees and hedgerows either through the cable construction route itself or through other works such as highway changes that are necessary to provide safe access to the construction site from the primary road network.</p>	<p>The assessment of potential landscape and visual effects, reported in F3.10, Volume 3, Chapter 10: Landscape and Visual Resources (APP-123), has accounted for the removal of key landscape features, such as trees and hedgerows, required for the cable construction route and associated works. As an example, Paragraph 10.12.2.49 states (inter alia, <u>emphasis</u> added by the Applicants for this response): “<i>During the construction phase, direct impacts will occur across a 100 m wide area over a route of approximately 17 km, which lies partially within the Green Belt (see Volume 3, Figure 10.4). <u>Direct impacts may include minimal tree removal, site clearance, soil storage, excavation, installation of temporary fencing, haul routes, and construction compounds (areas of hardstanding with fencing and lighting).</u></i>”</p> <p>The Applicants also refer Lancashire County Council to F3.10.5 Volume 3, <i>Annex 10.5: Tree survey and arboricultural impact assessment</i> (APP-128), which reports the landscape features (trees and hedgerows) may be subject to removal as part of the Transmission Assets, however, micro-siting will be used within the Onshore Infrastructure Area to avoid as many trees wherever practicable.</p>

Reference	Relevant Representation Comment	Applicants' response
		The Applicants also note that <i>Volume 1, Annex 5.3: Commitments Register (AS-030)</i> - which documents the mitigation measures ('Commitments') identified through the Environmental Impact Assessment (EIA) process - commits the Applicants as part of CoT13 to replacing the hedgerows and trees that are removed using like for like hedgerow species. This commitment is secured via DCO Schedules 2A & 2B, Requirement 8 (Code of Construction Practice); and Requirement 12 (Ecological Management Plan).
RR-1262 1262.19	Landscape The land restoration proposals should also be sufficiently detailed so that it can be concluded that there will be an enhancement of landscape features compared to the existing situation. This needs to be fully addressed by the applicant with further documentation produced for review.	<p>The Applicants acknowledge Lancashire County Council's comments and refer them to <i>Volume 1, Annex 5.3: Commitments Register (AS-031)</i>, which documents the mitigation measures ('Commitments') identified through the Environmental Impact Assessment (EIA) process. Please refer to the mitigation measures and commitments detailed in RR-1262.4 above for the relevant plans and how these are secured.</p> <p>The outline Landscape Management Plan (oLMP) (APP-208), submitted as part of the Application, provides the framework for landscape design and maintenance measures, which will inform the detailed Landscape Management Plans for the Morgan OWL onshore substation and the Morecambe OWL substation.</p> <p>The landscape proposals and management obligations aim to ensure the successful establishment and growth of proposed planting following construction. The oLMP details the landscape management measures to be implemented during the first five years after planting or seeding along the onshore export cable corridor and the 400 kV grid connection cable corridor, as well as for the lifetime of the onshore substations.</p> <p>The oLMP is to be read in conjunction with the outline Ecological Management Plan (APP-212), which accompanies the DCO application. It describes the onshore ecological mitigation measures to be implemented</p>

Reference	Relevant Representation Comment	Applicants' response
		before, during, and after the construction of the onshore development, along with long-term management strategies for reinstated habitats, including hedgerows, trees, and woodlands.
RR-1262 1262.20	Land Use <p>The proposals will result in the loss of an area of agricultural land due to the (now) 100m width of the construction corridor. Such impacts may be for a time period significantly longer than the construction period taking into account the phasing of the development from the two windfarms, as well as any consequences to surface water and land drainage. This needs to be fully addressed by the applicant with further documentation produced for review.</p>	<p>The assessment of the temporary loss of agricultural land, including Best and Most Versatile (BMV) land during construction of the Transmission Assets was undertaken based on the MDS set out in Table 6.18 of Volume 3, Chapter 6: Land use and recreation (APP-104). The Rule 9 – ES Assessment of Construction Scenarios (AS-070) confirmed that the MDS for the assessment is sequential construction as this represents the longest duration of temporary loss of agricultural land, including BMV land. With respect to onshore export cable corridor and 400 kV grid connection cable corridor, the duration of the construction phase under the sequential construction scenario would be up to 66 months. As such, the assessment of the temporary loss of agricultural land, including BMV land has already considered the longest possible construction period for the cable corridors. Following the implementation of measures set out in the Soil Management Plan and Code of Construction Practice, which will be prepared in accordance with the Outline Soil Management Plan (APP-200) and Outline Code of Construction Practice (APP-193) (secured under Requirement 8 of Schedule 2A and Schedule 2B of the draft DCO), the phasing of development would have no implications for the conclusions reached regarding the temporary loss of agricultural land, including surface water and land drainage, during construction of the Transmission Assets. Measures to control surface water runoff and flood risk will be implemented via the Outline Surface Water Groundwater Management Plan (APP-202), which forms part of the Outline CoCP (secured under Requirement 8 of Schedule 2A and Schedule 2B of the draft DCO). In addition, the Applicants have made a commitment (CoT84 of Volume 1, Annex 5.3: Commitments Register of the ES (AS-030)) to develop field drainage plans in consultation with the relevant landowners. If required, additional field drainage will be installed to ensure the existing drainage of the land is</p>

Reference	Relevant Representation Comment	Applicants' response
		maintained during and after construction. This is secured by Requirement 8 within Schedules 2A & 2B of the draft Development Consent Order (AS-004). Detailed CoCP(s) will be implemented by the Applicants as approved by relevant local authorities in consultation with stakeholders, as appropriate. Therefore, the Applicants confirm that the potential impacts arising from this worst case scenario have already been addressed.
RR-1262 1262.21	Construction Management <p>There are specific points along the onshore cable corridor where the order limits are constrained, or where the construction works will occur very close to residential properties. In addition, limited information has been presented on how development will be undertaken and managed on highway routes (including residential street and narrow rural lanes) that are used by vulnerable road users including pedestrians (local or visitors), cyclists and equestrians, whether individually or active groups i.e., walking, running or cycling groups using particular corridors, or well used defined routes such as the Preston Guild Wheel.</p>	<p>The Applicants have submitted an outline Code of Construction Practice (APP-193) with the Application that presents the framework and outline of measures to manage the environmental impacts during the construction phase of the Transmission Assets, including those locations where construction works will occur close to residential properties or where the order limits are constrained.</p> <p>The detailed CoCP(s) will be supported via a series of management plans. Requirement 8 of Schedule 2A and Schedule 2B of the draft Development Consent Order (AS-004) sets out the documents that will be appended to the detailed CoCP(s) (as secured by requirements in the DCO). Outline versions of these plans are provided with the DCO application.</p> <p>A response to highways matters has been provided at RR-1262.24 to 41.</p>
RR-1262 1262.22	Construction Management <p>It is important that the construction management plan, at this stage, also considers all known events that take place on the Fylde Coast, including the Lytham Festival, golf tournaments, Blackpool illuminations and general tourism. This is needed to ensure that a solution is possible and can be safely managed by the developer whilst not impacting on safety or convenience of the various attractions that the economy of Fylde coast relies upon. A</p>	

Reference	Relevant Representation Comment	Applicants' response
	significant amount of further work (with evidence) is necessary to understand how construction in these areas would be managed to negate against harm.	
RR-1262 1262.23	<p>Major Accidents and Disaster Assessment</p> <p>The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 introduced the requirement for Major Accidents and Disasters to be considered as part of the EIA process.</p> <p>The Civil Contingencies Act 2004 (Contingency Planning) Regulations 2005 places duties on Category 1 responders, including Lancashire County Council, to assess risks of emergencies, both natural and man-made, and to maintain emergency plans to mitigate, manage and control the effects of such emergencies to protect the public and the environment. There does not appear to be much information/communication regarding this, prior to this DCO application, related to emergency planning to allow an assessment of vulnerability to take place. This makes it difficult to understand whether the onshore construction activity has been properly assessed against the pre-existing civil emergency risks or if aspects of the construction activity itself may impact on pre-existing Lancashire wide emergency response arrangements. For example, this development impacts on many routes and corridors simultaneously, alternative emergency routes are needed, whether for the development routeing or for others in an emergency situation. Further, Blackpool Airport and the radar station is nearby, there is a rear risk power or communication lines could be impeded. Major accidents/incidents/disasters and not just those</p>	<p>The potential for major accidents and disasters arising from the construction, operation and maintenance and decommissioning phases of the Transmission Assets has been considered in the topic chapters of the ES and summarised in Table 5.3 of Volume 1, Chapter 5: Environmental assessment methodology (APP-034), these topics include the following:</p> <ul style="list-style-type: none"> • a reduction in groundwater quality and quantity resulting from accidental pollution: Volume 3, Chapter 1: Geology, hydrogeology and ground conditions (APP-068); • the impact of accidental pollution on quality of surface water and watercourses: Volume 3, Chapter 2: Hydrology and flood risk (APP-070); • increased flood risk: Volume 3, Chapter 2: Hydrology and flood risk (APP-070); • the vulnerability of the Transmission Assets to climate change: Volume 4, Chapter 1: Climate change (APP-138); • accidental pollution: <ul style="list-style-type: none"> – Volume 3, Chapter 3: Onshore ecology and nature conservation (APP-075); and – Volume 3, Chapter 4: Onshore and intertidal ornithology (APP-090). • the risk of vessel anchor and gear snagging: Volume 2, Chapter 7: Shipping and navigation (APP-056); • the risk of increased vessel collisions: Volume 2, Chapter 7: Shipping and navigation (APP-056); • a reduction of under keel clearance: Volume 2, Chapter 7: Shipping and navigation (APP-056);

Reference	Relevant Representation Comment	Applicants' response
	highlighted need to be considered with suitable risk assessment undertaken.	<ul style="list-style-type: none"> • a reduction of emergency response capability and reduced access for SAR responders: Volume 2, Chapter 7: Shipping and navigation (APP-056); • the impact of construction traffic on accidents and safety: Volume 3, Chapter 7: Traffic and transport (APP-108); and • the impact of Abnormal Indivisible Loads on safety: Volume 3, Chapter 7: Traffic and transport (APP-108). <p>Communication on the above issues was undertaken with stakeholders (including Lancashire County Council) during Expert Working Group (EWG) meetings for the following topics</p> <ul style="list-style-type: none"> • onshore ecology and nature conservation; • onshore and intertidal ornithology; • hydrology and flood risk; and • traffic and transport <p>Discussions were informed by indicative assessment results to provide attendees with sufficient detail to provide any comments as appropriate. Full details on the Evidence Plan Process and the EWG meeting for each topic are included in the Technical Engagement Plan (APP-189) and its appendices (APP-190, APP-191 and APP-192).</p> <p>The Applicants are discussions with Blackpool Airport Operations Limited (RR-245) and Blackpool Airport Properties Ltd. (RR-246) and are in ongoing dialogue with both parties. The Applicants have provided detail on those discussions in the Applicants' response to Rule 9 letter (AS-067).</p>
RR-1262 1262.24	Highways	The Applicants have provided an abridged response to all matters raised by Lancashire County Council below noting that further engagement has

Reference	Relevant Representation Comment	Applicants' response
	<p>The County Council has concerns regarding the adequacy of the submitted information. The submission is lacking in many areas of analysis in relation to highways. Evidence to support the suitability and feasibility of some of the routing proposals is required – both with/without mitigation, and with regard for all highways impacted, including structures within the highway. The proposal will generate high levels of HGV traffic, and require a number of abnormal loads, and the consequences to other users from this project and on the existing infrastructure, do not appear to have been appropriately considered nor mitigated.</p>	<p>been carried out on the 12th March and 7th April, following the submission of the relevant representation to discuss matters of detail and these will be reflected in the Statement of Common Ground to be submitted as part of the Examination process.</p>
RR-1262 1262.25	<p>Lancashire County Council, in its role as the Local Highway Authority are keen to engage in dialogue regarding necessary works for all parts of the development and it's life cycle – (i.e. access; construction; rectification works post-delivery; abnormal loads and their impact; post-development; development decommissioning). At present much of this requires further clarification.</p>	<p>The Applicants have undertaken consultation with LCC through the development of the DCO application and welcome LCCs offer to engage further.</p> <p>A summary of the pre-application consultation with LCC is provided within Section 7.3.4 of Volume 3, Chapter 7: Traffic and Transport of the Environmental Statement (APP-108).</p> <p>Both parties have agreed to continue to work together and have met on the 12 March and 7 April 2025 and to allow the Applicants to gain an understanding of LCCs concerns, provide clarifications and discuss any updates required.</p>
RR-1262 1262.26	<p>Highways</p> <p>It is expected that the assessment fully considers the effects on transport including impact on driver delay, non-motorised delay, fear and intimidation, severance (caused by construction works/traffic), road safety etc. and can be monitored throughout the project. However, the proposal includes mobilisation and operating hours of 6am-8pm</p>	<p>The Applicants would initially direct the Council to Volume 3, Chapter 7: Traffic and Transport of the Environmental Statement (APP-108) which contains an assessment of the Transmission Assets impacts to traffic and transport receptors. To inform the assessment, the Applicants have undertaken a comprehensive data collection exercise including capture of baseline traffic flows, speeds, identification of sensitive receptors and collisions for all highway links within Blackpool Council, Lancashire County</p>

Reference	Relevant Representation Comment	Applicants' response
	Mon to Sat, which indicates this matter has not been given the requisite level of consideration	<p>Council and National Highways administration areas. In total, data for 91 highway links have been collected covering over 155km of highway network.</p> <p>The assessment has considered the effects of the Transmission Assets on driver delay, severance, non-motorised user delay, fear and intimidation, road safety and abnormal loads and concludes that (with the application of mitigation measures) residual effects would not be significant in Environmental Impact Assessment (EIA) terms.</p> <p>The Applicants would clarify that working hours for Transmission Assets are 07:00 to 19:00 (Monday to Saturday) and this commitment is secured by Requirement 14 of Schedules 2A and 2B the draft DCO (AS-004).</p> <p>The outline Code of Construction Practice (APP-193) clarifies that the mobilisation period (up to one hour before and after core working hours for mobilisation i.e. 06:00-07:00 to 19:00-20:00) will include:</p> <ul style="list-style-type: none"> • arrival and departure of the workforce at the site and movement around the Transmission Assets that does not require the use of plant; • site inspections and safety checks; and • site housekeeping that does not generate significant noise or lighting levels. <p>Therefore, arrival and departure of Heavy Goods Vehicle movements are not permitted within the mobilisation period.</p> <p>To minimise construction traffic impacts there will be the requirement for employees to travel outside of these times. This approach has the benefit of ensuring that workers would travel outside of the network peak hours, thereby reducing the effects upon driver delay (capacity) and also avoids significant employee movements during the more sensitive periods for the effects of severance and amenity, e.g. during morning and evening</p>

Reference	Relevant Representation Comment	Applicants' response
		network peak hours and school start and finish times (where non-mortised user movements would be higher).
RR-1262 1262.27	Highways No (specific) discussion with the Local Highway Authority on the likely impacts has been had, and the consequences of delivery of this project are not adequately set out. As such, the LHA cannot indicate with that presented what is required to make the proposal acceptable. Further analysis is required supported by necessary mitigation.	The Applicants refer LCC to response to RR-1262.25.
RR-1262 1262.28	Highways The LHA is concerned there will likely be significant damage to the highway (including structures), and as a consequence the risk of road closures. In addition, the applicant is unclear on how the cost of development related damage to the highway network will be met. This is a concern, especially given the sensitivity of some of the roads in this part of the County (see also: Moss Roads)	The Applicants would direct LCC to Section 1.9.3 of the Outline Construction Traffic Management Plan (OCTMP) (APP-211) which includes a commitment to undertaking surveys of the highway condition before and following completion of construction. The OCTMP outlines that the results will be compared to identify any deterioration to the highway condition attributable to the Transmission Assets construction traffic and a remediation strategy agreed with LCC. The requirement to produce detailed CTMP(a) in accordance with the OCTMP and agree this with the relevant highway authority is secured by Requirement 9 of Schedule 2A and Schedule 2B of the draft DCO (AS-004).
RR-1262 1262.29	There are inconsistencies within the Outline Highway Access Management Plan (OHAMP) which indicates crossing points and accesses but then omits in supporting information. It is unclear in all locations what is being proposed and what is an error. It is essential that documents are consistent with one another.	The Applicants have discussed this matter with LCC at a meeting on the 12 March 2025 to understand what clarifications are required and LCC have provided further clarifications. The Applicants are reviewing these comments and will update the outline Highway Access Management Plan (oHAMP) (AS-052) as necessary. The Applicants would note that Section 1.3.4 and 1.3.5 of the outline Highways Access Management Plan (AS-052) set out the approach to agreeing the final design of all accesses and crossings with LCC. This would include the submission of an independent

Reference	Relevant Representation Comment	Applicants' response
		Stage 1/2 Road Safety Audit. The requirement to produce and agree the detailed HAMP(s) in accordance with the oHAMP is secured by Requirement 10 of Schedule 2A and Schedule 2B of the draft DCO (AS-004).
RR-1262 1262.30	<p>OHAMP: 62 of the proposed 65 accesses are not acceptable as presented – either due to concerns or further information being required. Concerns include:</p> <ul style="list-style-type: none"> • Inconsistent plans; • Junction layouts; • Deliverability; • Visibility requirements not being deliverable within land in control of the developer; • Incorrect visibility dimensions being applied in both the x and y directions • Visibility requirements in some cases requires a significant amount of hedgerow being removed (impacting on local Ecology and Landscape issues), so further work is required to satisfy both of these issues • High-speed road conflict. On high-speed roads where left in/left out accesses are proposed, no regard has been had to how this will be safely managed to reduce conflict (HGVs manoeuvre at low speeds). Provision of acceleration and deceleration lanes needs further consideration. 	<p>The Applicants have met with LCC on the 12 March and 7th April 2025 to discuss these matters and LCC have provided further clarifications. The Applicants are reviewing these comments and will update the outline Highways Access Management Plan (OHAMP) (AS-052) as necessary. The Applicants provide the following general points of clarification/observations with regard to the outline Highways Access Management Plan (OHAMP) (AS-052).</p> <p>Junction Layout</p> <p>The Applicants have prepared outline designs for all accesses and crossings. These plans provided in the oHAMP (AS-052) include detail of the junction geometry that has been informed by swept path analysis of the largest type of vehicles that could be expected to ensure that HGVs can safely pass.</p> <p>Visibility</p> <p>The outline access and crossing designs (provided in the oHAMP (AS-052)) include visibility splays to ensure that drivers departing from accesses and crossing can safely observe traffic on the main road. These splays have generally been developed based upon the posted speed limit of the road or measured speeds and are in accordance with the relevant design guidance. Where the provision of the visibility splay could result in the requirement for the removal of trees or hedges these splays are included within the Order Limits and the powers to remove the hedges (as</p>

Reference	Relevant Representation Comment	Applicants' response
	<ul style="list-style-type: none"> A number of the proposed junctions provide a left in / left out arrangement, however the requirement for U-turning vehicles or routing for them as presented is not clear nor is any evidence presented that suggests that other junctions can safely accommodate this. Evidence demonstrating that this is appropriate is required for both swept path and also operationally having adequate regard to safety. The proposals as presented have little regard to existing infrastructure and its need i.e. the removal of a layby to deliver an access. It would be usual to replace that removed. At locations where haul roads cross existing highway, there is a concern regarding its operation, as limited provision is proposed resulting in conflict and safety issues. 	<p>a worst case) are provided within the draft DCO (AS-004). Where the provision of the splay would not require works, e.g. it is across a highway verge or footway these are typically excluded from the Order Limits.</p> <p>The Applicants acknowledge that the provision of accesses and crossings and visibility splays will in some locations require the removal of hedges, and these are shown in B18 Tree Preservation Order and Hedgerow Plan – (APP-165 – 167). The Applicants have also discussed options that LCC highways may accept to reduce the extent of hedgerow removal, such as trimming/coppicing of the hedge, a temporary reduction in the speed limit, traffic signals or a banksperson.</p> <p>Left in left out accesses</p> <p>Left in-left out accesses are provided for junctions on main A roads, to remove the requirement for vehicles to right turn. These roads are subject to either a 40 or 50mph speed limit and as such in accordance with the requirements of the Design Manual for Roads and Bridges (National Highways, 2021. CD123 – Geometric design of at grade priority and signal controlled junctions) merge and diverge tapers are not typically required, noting merge and diverge tapers are not provided for the majority of existing junctions along these roads.</p> <p>The Applicants consider that it is not proportionate to provide swept path analysis of the U-turning at nearby roundabouts noting that the roundabouts have the appearance of being modern standard compliant junctions and would therefore have been designed to accommodate turning HGV traffic.</p> <p>Haul road crossings</p> <p>Haul road crossings are proposed to allow vehicles to safely cross from one side of the highway to the other (avoiding direct access). These crossings are proposed at locations where existing traffic flows are low and direct access is not being sought due to the minor road conditions. To</p>
RR-1262 1262.31	<p>Proposed accesses</p> <p>The above are examples of some safety issues. Full details of likely impacts on the highway network will be contained with the County Council's Local Impact Report.</p>	

Reference	Relevant Representation Comment	Applicants' response
		allow drivers to safely cross, all crossing designs (provided in the oHAMP (AS-052)) include appropriate visibility splays to allow drivers to safely observe oncoming traffic and give-way as required.
RR-1262 1262.32	<p>Moss Roads</p> <p>West Lancashire, the Fylde, and Wyre have a higher incidence of peat land and moss roads than many other areas. During hot summers, the foundations of roads become severely deformed leading to cracked road surfaces, deeply rutted surfaces, undulating road surfaces caused by subsidence along the road edge and/or across the carriageway width and in a number of cases, particularly where the road is on a bank of peat that is higher than the surrounding land, failing carriageway edges. During wetter winters, water penetration can further damage the substructure. The cost of repairing a deteriorating moss road is considerably higher than roads on other parts of the road network. Regard needs to be had to the Moss Road Strategy (Lancashire County Council, 2024).</p> <p>The proposal does not adequately consider the presence of peat and moss roads, a notable characteristic of the part of the county affected by this project</p>	Please refer to the Applicants' response to RR-1262.28 with regard to deterioration of highway condition (which includes Moss Roads).
RR-1262 1262.33	<p>Proposed routes</p> <p>The proposal does not adequately assess access routes. Safe development requires routeing that allows two vehicles to pass one another, to minimise delay and prevent reversing of large vehicles. Some of the routes proposed are narrow with carriageways which do not allow 2 HGVs to pass. In other cases, these are within the</p>	In the UK, a 'functional road hierarchy' was established in its current form in the 1960s to provide for the efficient movement of motor vehicles on the highway network (ref. Guidance on Road Classification and the Primary Route Network, 2012, DfT). The following four tier system is directed by the Department for Transport (DfT) for roads managed by a Local Highway Authority (LHA):

Reference	Relevant Representation Comment	Applicants' response
	built environment, but on-street parking (and the practical carriageway width) has not been considered. This is a concern.	<ul style="list-style-type: none"> • A roads – major roads intended to provide large-scale transport links within or between areas. • B roads – roads intended to connect different areas, and to feed traffic between A roads and smaller roads on the network. • Classified unnumbered – smaller roads intended to connect together unclassified roads with A and B roads, and often linking a housing estate or a village to the rest of the network. • Unclassified – local roads intended for local traffic. The vast majority (60%) of roads in the UK fall within this category. <p>The functional hierarchy informs policies relating to maintenance, spatial planning and traffic management; by definition A and B roads are subject to higher levels of service and less traffic restraints.</p> <p>The Applicants note that an access strategy has been developed that seeks to reduce the requirement for construction traffic to travel via local road and instead aims to prioritise the use of motorways and A and B roads (in line with the functional road hierarchy) for the movement of construction traffic where possible.</p> <p>To facilitate this strategy the Applicants have made a commitment to the use of a temporary haul roads as set out in (CoT 24 of Volume 1, Annex 5.3: Commitments Register of the ES (AS-030) and secured by Requirement 9 within Schedules 2A & 2B of the draft Development Consent Order (AS-004), thereby reducing the requirement for construction traffic to avoid travel via the local road network and avoiding sensitive communities.</p> <p>The Applicants would note that over 89% of routes to be used by HGVs are over 6.0m in width, e.g. able to accommodate two-way HGV movements.</p>
RR-1262 1262.34	Proposed routes The analysis suggests that 2 HGVs can pass within a highway of 5.5m. This assumption is flawed – it does not allow for wingmirrors, the gap required to pass, the road character (i.e. bend on approach) nor a margin of error. In addition, the approach described will be followed 'where practical', i.e. there are highway links where highway is being proposed which is below 5.5m in width. As presented, at this stage, this is a safety issue of significance.	
RR-1262 1262.35	Proposed routes It is also noted there are issues with some of the background plans and dimensions provided, which presents incorrect information regarding highway width (i.e. the plans show roads wider than they are). This issue and all others need to be resolved at this stage, otherwise there will be a safety issue when the routes are being used and cannot accommodate 2-way vehicle movements for the proposed development.	

Reference	Relevant Representation Comment	Applicants' response
		<p>It is however acknowledged by the Applicants that there are some locations where the existing highway geometry is constrained, typically this comprises of short sections of highway which provide key connections to wider main roads (referred to herein as the 'last leg'). The last leg routes form approximately 17km of the delivery routes, the majority of which are between 5.5 and 6.0m in width.</p> <p>The Applicants are engaging with LCC to understand if further measures could be included within the outline Construction Traffic Management Plan (OCTMP) (APP-211) and what plans may benefit from updating to provide LCC with the assurance that vehicle movements via the last leg routes can be effectively managed and controlled.</p>
RR-1262 1262.36	<p>Proposed routes</p> <p>The layout presented suggests removal of existing footway (for example access points A26 and A28). Removal of footway is a retrograde step and presents a safety concern that goes directly against design standards. In addition, the construction design of a footway is not the same as carriageway, with the area of footway being susceptible to poor ground conditions and which may require preloading. Footway removal (temporary) would only be supported if clear evidence is provided that the footway is not needed, and this evidence is not provided.</p>	<p>The Applicants would clarify that there are no proposals to remove the existing footway at access points A26 and A28. Rather, pedestrians would be expected to cross the proposed temporary bellmouth at designated crossing points, e.g. dropped kerbs. The Applicants would note that Section 1.3.4 and 1.3.5 of the outline Highways Access Management Plan (OHAMP) (AS-052) outlines the approach to agreeing the final design of all accesses and crossings with LCC. This would include the submission of an independent Stage 1/2 Road Safety Audit. The requirement to produce and agree the detailed HAMP(s) in accordance with the oHAMP is secured by Requirement 10 of Schedule 2A and Schedule 2B of the draft DCO (AS-004).</p>
RR-1262 1262.37	<p>Proposed routes</p> <p>No evidence has been provided regarding demand by vulnerable road users of the network or impact, which raises safety concerns.</p>	<p>The Applicants would direct the Council to Section 7.5 of Volume 3, Chapter 7: Traffic and Transport of the Environmental Statement (APP-108) which contains details of the approach to defining the baseline highway environment. This includes a review of the highway environment,</p>

Reference	Relevant Representation Comment	Applicants' response
		sensitive receptors and the affected road user (Table 7.12). A review of baseline road safety is provided within Section 7.6.5.
RR-1262 1262.38	Proposed routes <p>There is no commitment for mitigation or to fund damage to the public highway caused by the delivery of this project. However, what is highlighted is that the application requires the clearance of vegetation and other obstacles to facilitate access. This appears to indicate overrun of the highway into verges that will result in damage, compaction, reduction of the effectiveness of verge as a drain, edge of carriageway deterioration and safety of pedestrians who may use verges.</p>	<p>Highway Damage The Applicants refer LCC to their response to RR-1262.28.</p> <p>Vegetation Clearance The Applicants refer LCC to the Tree Preservation Order and Hedgerow Plan (Parts 1 to 3) (APP-165, 166 and 167). These plans indicate the worst case extent of hedgerow that could be required to be removed to facilitate the construction of the Transmission Assets. With regard to hedges alongside highways, the only hedges proposed to be removed are those required to facilitate either the construction of the accesses and crossings, or to provide the requisite forward visibility splays. No hedges are proposed to be removed for access beyond this.</p> <p>The Applicants are in ongoing dialog with LCC to understand what options LCC highways may accept to reduce hedgerow loss.</p>
RR-1262 1262.39	Bridges and Structures <p>All structures and bridges along the proposed routes will require assessing for their suitability to satisfy general HGV's and abnormal loads in both size and weight. There are routes where the County Council has identified the need for works on bridges, but not currently required based on existing usage. As a consequence of HGV movements from this project, works would likely be required on a number of these structures and would need to be delivered by the developer in advance of their use. All structures need reviewing for their suitability any changes that might be required (and can these changes</p>	<p>The Applicants' have commissioned Wynns (consulting engineers specialising in the movement of abnormal loads) to assess the potential for the movement of the cable drums and transformers for the Transmission Assets (the scope of which includes a review of highway structures and route geometry). The findings of the assessment, including identification of a mechanism to facilitate necessary development related changes, will be submitted into the examination at an appropriate future Deadline.</p> <p>The Applicants also note that the utility companies have the benefit of protective provisions at Schedule 10 to the draft DCO (AS-004).</p>

Reference	Relevant Representation Comment	Applicants' response
	be delivered within highway boundary), as well as agreement on a mechanism to facilitate necessary development related changes.	
RR-1262 1262.40	Highway No regard has been had to the impacts on other developments that are being built out, committed development, or those currently the subject of planning applications, nor works required by utility companies (who legally can work within the highway when required).	<p>The Applicants would direct the Council to Section 7.13 of Volume 3, Chapter 7: Traffic and Transport of the Environmental Statement (APP-108) which contains an assessment of the potential for cumulative effects with other schemes.</p> <p>The potential for cumulative effects with utilities companies is addressed by the powers and duties afforded by the New Roads and Street Works Act 1991 (as amended by the Traffic Management Act 2004).</p> <p>In accordance with this street works legislation, all highway works for the Transmission Assets would be required to be booked through Street Manager (National Street Works Gazetteer). The booking of any works through Street Manager (as mandated, and adopted by Lancashire County Council) will ensure that all highway works are progressed in accordance with the relevant highway authorities' requirements and restrictions (e.g. ensuring road works are scheduled outside of defined traffic sensitive periods and co-ordinated with other utility companies) and that the relevant highway authorities can continue to exercise their duties to ensure the safe and efficient movement of traffic.</p>
RR-1262 1262.41	Highway The documentation presented makes the assertion that existing HGV TROs (Traffic Regulation Orders) determine whether a route is suitable for HGVs or not. This is not the case, as HGV TROs are used in locations where historically minor roads have been used as part of a longer route, not in line with a highway hierarchy. Suitability of routes should not be determined by	Please refer to the Applicants response to RR-1262.33 and 1262.39.

Reference	Relevant Representation Comment	Applicants' response
	restrictions, but rather by characteristics of the route and potential impact of the proposal.	
RR-1262 1262.42	<p><u>Summary Position</u></p> <ul style="list-style-type: none"> a) welcomes in principle the proposals in respect of their benefits in terms of reducing carbon emissions from energy generation thereby helping to address climate change. The proposal is likely to support a number of jobs but there is scope for a commitment; b) is of the opinion that the proposals currently do not adequately address significant issues - especially those which Lancashire County Council have statutory duties in relation to, such as Highways (the safety of all users and the protection/maintenance of public infrastructure); c) is unable to confirm at this stage whether it supports the proposal based on the information presented. Documentation is inconsistent and it cannot be determined whether impacts are severe, the development can be satisfactory mitigated, or that the public assets will be suitably protected; d) remains supportive of a close working arrangement to resolve the issues. It is essential work is undertaken at a sufficient level of detail to be able to conclude matters to the satisfaction of the consultees and communities affected by the proposal, and; e) continue to raise our concerns with the Examining Authority regarding the impacts resulting from this proposal until suitable evidence is provided and 	<p>The Applicants note the summary position from Lancashire County Council. Responses to each individual point are previously addressed above. The Applicants welcome the opportunity to work with LCC in resolving matters raised and are confident that all matters can be resolved through the Examination.</p>

Reference	Relevant Representation Comment	Applicants' response
	agreed, and impacts are fully mitigated against, during and post development.	

3 References

IAQM (2024) Guidance on the assessment of dust from demolition and construction.
Available at: [REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]