

# **MORGAN AND MORECAMBE OFFSHORE WIND FARMS: TRANSMISSION ASSETS**

**Annex 3.2.18 to Response to RR -Newton with Clifton Parish Council (RR-1616)**



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## Contents

<b>1</b>	<b>APPLICANTS' RESPONSE TO RELEVANT REPRESENTATIONS .....</b>	<b>3</b>
1.1	Introduction.....	3
<b>2</b>	<b>RESPONSES TO RELEVANT REPRESENTATIONS .....</b>	<b>4</b>
2.1	Newton with Clifton Parish Council .....	4
<b>3</b>	<b>REFERENCES .....</b>	<b>ERROR! BOOKMARK NOT DEFINED.</b>

## Tables

Table 1.1: RR-1616 - Newton with Clifton Parish Council .....	4
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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 the Relevant Representation of Newton with Clifton Parish Council (RR-1616).

## 2 Responses to Relevant Representations

### 2.1 Newton with Clifton Parish Council

**Table 2.1: RR-1616 - Newton with Clifton Parish Council**

Reference	Relevant Representation Comment	Applicants' response
RR-1616 1616.1	This is a Relevant Representation (RR) regarding the Morgan and Morecambe Offshore Windfarm Transmission Assets Project (the Project), promoted by Morgan Offshore Wind Limited and Morecambe Offshore Windfarm Limited (the Applicant) made by Broadfield Law UK LLP on behalf of Newton with Clifton Parish Council (the Council). The Council objects to the Project on the grounds set forth in this RR. These grounds raise questions about the Applicant's reasoning for the proposed site locations for the Morgan and Morecambe onshore transmission assets, as well as the detrimental environmental consequences of this decision.	The Applicants thank Newton with Clifton Parish Council for their Relevant Representation and have set out their reply in responses 1616.2 to 71 below.
RR-1616 1616.2	<p><b>1 Site / Route Selection and Alternatives</b></p> <p>1.1 The Applicant, in selecting the location for its onshore transmission assets, has given preference to development in designated Green Belt land, in contravention of the requirements and guidelines prescribed in The National Planning Policy Framework (NPPF), the National Policy Statements (NPS) NPS EN-1 (Overarching National Policy Statement for Energy), NPS EN-3 (Renewable Energy Infrastructure), and the Fylde Local Development Plan (FLDP). In particular, safeguarding the environment, responding to local character, reflecting the identity of local surroundings, reducing flood risk, protecting and enhancing local landscapes and, importantly, Green Belt land.</p>	<p>The test for very special circumstances has been met.</p> <p><b><u>National Policy Statement (NPS) EN-1</u></b></p> <p>As an integral part of a nationally significant low carbon infrastructure project, the Transmission Assets are considered to be critical national priority (CNP) infrastructure, as set out in paragraph 4.2.4 of NPS EN-1 and the sections 5.24, 6.2 and 6.4 of the Planning Statement (APP-233). Paragraph 4.2.5 of NPS EN-1 confirms that energy transmission projects directed to be considered under the Planning Act 2008 under a section 35 direction (as is the case for the Transmission Assets) constitute CNP infrastructure.</p> <p>The Applicants maintain that the Transmission Assets benefit from the policy set out at paragraphs 4.2.16 and 4.2.17 of EN-1 which state that</p>



Reference	Relevant Representation Comment	Applicants' response
		<p>CNP infrastructure is assumed, as a starting point, to have met any tests which are set out within the NPSs or any other planning policy (including the NPPF), which requires a clear outweighing of harm, exceptionality or very special circumstances, provided that the Applicants demonstrate that the mitigation hierarchy requirements set out in paragraph 3.3.63 of EN-1 have been met, as set out in section 3.4.4.15 of the Planning Statement (APP-233). This includes the requirements for very special circumstances to allow for development in the Green Belt.</p> <p><b><u>Impact of the Transmission Assets on the Green Belt</u></b></p> <p>The Applicants have assessed the implications of the Transmission Assets on the Green Belt in sections 5.24.1.4-5.24.1.9 of J28: Planning Statement (APP-233). The onshore export cable corridor consists of underground cables, which constitute engineering operations under paragraph 154 of the NPPF and do not conflict with the purposes of the Green Belt. These works are temporary, with the land being restored post-installation, so the spatial and visual impacts of the works, as well as the duration of the development and its ability to be remediated mean that the onshore export cable corridor both preserves the openness of the Green Belt and does not conflict with its purposes. While the onshore substations constitute new buildings, their siting and associated landscape mitigation have been designed to minimise landscape and visual impacts, as set out in sections 4.4 to 4.9 of ES Volume 1, Chapter 4: Site selection and consideration of alternatives (AS-026) and ES Volume 1, Annex 4.3: Selection and Refinement of the Onshore Infrastructure (AS-029).</p> <p><b><u>Compliance with 'very special circumstances' test</u></b></p> <p>The Applicants have demonstrated in section 6 of the Planning Statement (APP-233) that the significant benefits of the Transmission Assets as a result of energy transmission from renewable sources mean that even if the Project was not considered to be CNP, very special circumstances do</p>



Reference	Relevant Representation Comment	Applicants' response
		<p>indeed exist to outweigh the harm to Green Belt by reason of inappropriateness or any other harm.</p> <p>As set out in section 6.4 of the Planning Statement (APP-233), the Applicants have demonstrated in the ES and associated mitigation strategies (APP-015 - APP169 and AS-024 - AS-057) that they have assessed and ensured that residual effects are minimised, where possible.</p> <p>In any event, the Project complies with NPS EN-1, NPPF 2024 and local planning policy, as demonstrated in the Planning Statement (APP-233), the National Policy Statement Tracker policy compliance trackers (APP-231), the National Planning Policy Framework Tracker (APP-234) and the Local Planning Policy Tracker (APP-236).</p> <p>The Transmission Assets therefore meet the policy tests for very special circumstances, and there is no reason why the development should not proceed in Green Belt land. The Applicants confirm that a sequential test relating to land which is not Green Belt has been undertaken to aid the site selection process. The flood risk sequential test has been set out in section 1.9 of the Flood Risk Assessment (APP-074). Further, the Applicants do not assume automatic approval of the Project. Please see further detail set out below.</p> <p><b><u>Assessment undertaken</u></b></p> <p>Rather, the Applicants have robustly assessed the proposed development against national and local planning policy, including the requirement to demonstrate very special circumstances for development in the Green Belt. As detailed in sections 5.24, 6.2 and 6.4 of the Planning Statement (APP-233), the Transmission Assets meet the policy tests set out in NPS EN-1, the NPPF and local planning policy.</p>

Reference	Relevant Representation Comment	Applicants' response
		<p><b><u>Site selection process</u></b></p> <p>The site selection and refinement process followed an iterative approach, incorporating environmental, technical, and land related constraints, including consideration of land use, to determine the most optimal solution, on balance. By way of example, design modifications have been made in response to earlier assessments. At PEIR stage, the Transmission Assets boundary was within the Kirkham and Newton Area of Separation. However, following refinements, this area has been removed from the Order Limits, and no element of the Transmission Assets crosses or affects the 'Areas of Separation' designated in the Fylde Local Plan 2032, thereby retaining greater overall distance from settlements such as Newton with Scales to the east, in response to consultation feedback.</p> <p>This iterative process, outlined in ES Volume 1, Chapter 4: Site Selection and Consideration of Alternatives (AS-026) and ES Volume 1, Annex 4.3: Selection and Refinement of the Onshore Infrastructure AS-028), progressed through four stages, incorporating feedback at each stage and assessing non-Green Belt alternatives, where feasible. However, given the spatial requirements for the transmission infrastructure and the need to connect to the national electricity transmission network at Penwortham, avoiding all Green Belt land was not possible.</p> <p>A sequential test, as required by section 4.3 and paragraph 5.8.23 of NPS EN-1, was undertaken to assess site selection alternatives and is documented in Volume 3, Annex 2.3: Flood Risk Assessment (AS-040-AS-045). Additionally, as outlined in Section 4.4 of ES Volume 1, Chapter 4: Site Selection and Consideration of Alternatives (AS-026), the design process adhered to the mitigation hierarchy (to avoid, mitigate and compensate), ensuring alignment with the NPPF and NPS EN-1.</p> <p>Although every effort was made to avoid Green Belt land, constraints dictated by the required connection at Penwortham meant complete</p>

Reference	Relevant Representation Comment	Applicants' response
		<p>avoidance was unfeasible. Please refer to RR-2027.41 above, which provides a robust justification for the selection of Green Belt sites, demonstrating that very special circumstances exist by reference to the application documentation. The Applicants have minimised the extent of Green Belt land required by virtue of its reduction in the Transmission Assets Order Limits since PEIR, with mitigation measures secured through the Commitments Register (AS-030) to reduce impacts where possible.</p> <p>The proposal has been subject to detailed consultation with local planning authorities, statutory consultees and stakeholders, as evidenced in the Consultation Report (APP-170). It is the Applicants' position that the selected locations balance the delivery of CNP infrastructure with the need to minimise environmental and community impacts, where this has been possible.</p>
RR-1616 1616.3	<p>1.2 A significant portion of the proposed route for the underground cabling and the Morgan and Morecambe substations is located within the Green Belt between Freckleton and Kirkham. At paragraph 160, the NPPF provides that 'when located in the Green Belt, elements of many renewable energy projects will comprise inappropriate development', and that where this is the case, 'the developers will need to demonstrate very special circumstances if projects are to proceed'. Paragraph 5.11.20 of NPS EN-1, paragraphs 2.8.57 – 2.8.58 of NPS EN-3, and paragraphs 7.7 -7.8 of the FLDP underline the strict requirement for very special circumstances for using Green Belt land. The Applicant has failed to clearly demonstrate how the Project's location of onshore transmission assets in Green Belt land qualifies as 'very special circumstances', particularly as it has failed to provided evidence of consideration of brownfield sites or alternatives. If a diligent consideration exercise had been conducted, the Applicant would have considered the use of already provided industrial</p>	<p>Please refer to the Applicants' response to 1616.2.</p>

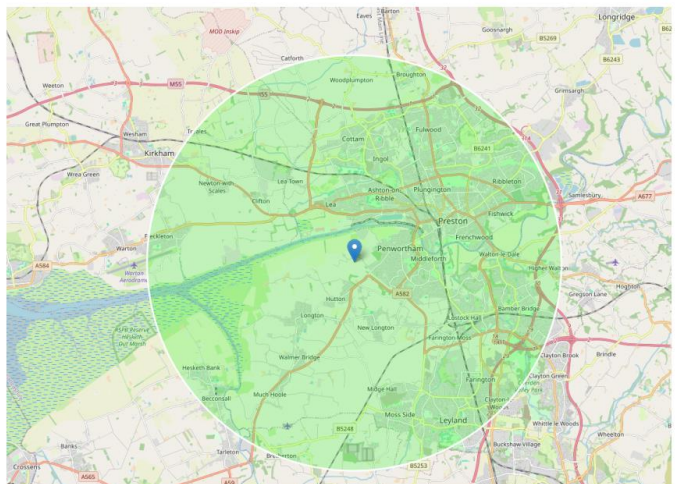
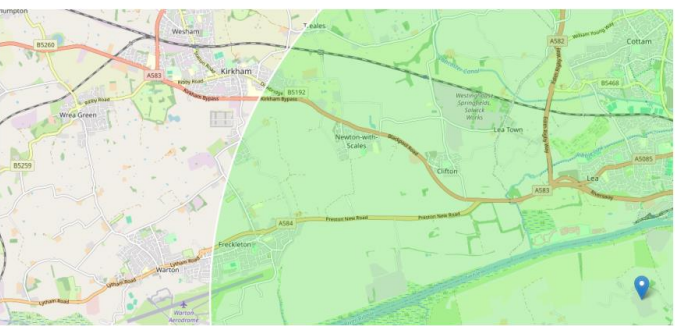
Reference	Relevant Representation Comment	Applicants' response
	development land and electricity transmission infrastructure, as outlined in paragraphs 1.14 to 1.21 of this RR.	
RR-1616 1616.4	1.3 Paragraph 2.2.10 of the NPS EN-5 (Electricity Networks Infrastructure), with reference to section 9 and Schedule 9 of the Electricity Act 1989 (as amended), requires that the Applicant has "regard to the desirability of preserving natural beauty, of conserving flora, fauna and geological or physiographical features of special interest and of protecting sites, buildings and objects of architectural, historic or archaeological interest; and... do what [they] reasonably can to mitigate any effect which the proposals would have on the natural beauty of the countryside or on any such flora, fauna, features, sites, buildings or objects." The Applicant appears to have disregarded most if not all of these considerations.	Please refer to the Applicants' response to 1616.2.
RR-1616 1616.5	1.4 In terms of size, the dimensions of the substations are disproportionately large and intrusive, and the reason for this remains unclear. The Applicant proposes to take 22.35 hectares of Green Belt land for a system with a headline output of 2GW. By contrast, the two converter substations for the 2.4GW Dogger Bank A&B Offshore wind farms occupy a footprint of a total of 7.5 hectares. Additionally, the substations for the Hornsea One and Two wind farms, which generate 2.5GW, have a footprint of 7.1 hectares, and the substation for the Mooir Vannin wind farm (see paragraph 1.6 below), which is expected to generate 1.4GW, has a maximum footprint of 6.6 hectares. Considering this, the 16.6 hectare footprint for the Morgan substation and 5.95 hectare footprint for the Morecambe substation appear to be extremely large when their combined output is 2GW. Insufficient explanation or justification has been provided by the Applicant. Had the Applicant chosen a smaller design, this would have increased their pool of possible locations, potentially eliminating the need to take Green Belt land.	<p>The Applicant notes that a comparison is being drawn between the Transmission Assets maximum approximate permanent footprint including onshore substation platform, landscaping, access, drainage (m<sup>2</sup>) and attenuation and the maximum onshore substation platform footprint (m<sup>2</sup>) for other offshore wind farm substations. The Transmission Assets maximum onshore substation platform footprint (m<sup>2</sup>) is 8 hectares for the Morgan Offshore Wind Project; and 2.97 hectares for the Morecambe Offshore Windfarm. These dimensions are comparable with the examples listed.</p> <p>Additionally, the onshore converter substations referenced are for electrical designs that utilise Direct Current (DC) technology, which typically requires a smaller footprint due to fewer circuits and less associated above ground infrastructure required to deliver equivalent power when compared to alternative current technology. As stated in Section 3.5.1.1 of Volume 1, Chapter 3 Project Description (AS-024), the onshore substations for the Transmission Assets are to use an Alternating Current technology. As such, the dimensions of the onshore substation platform footprints are not directly comparable to other projects and the Applicants are not in a</p>

Reference	Relevant Representation Comment	Applicants' response
		<p>position to comment on the design principles behind the maximum substation platform footprints identified for those projects.</p> <p>The outline Design Principles (oDP) (APP-209) sets out the considerations that will inform the detailed design of the permanent works at each of the onshore substations, including their height, layout and maximum footprint. The detailed design of each of the substations will be developed substantially in accordance with the oDP, as secured by Requirement 4(2) of Schedule 2A and Schedule 2B of the draft DCO (AS-004). These details will be submitted to and approved by the relevant planning authority prior to start of construction at each of the onshore substations.</p> <p>The Applicants have provided full justification for the heat mapping and appraisal of zones, including Black-Red-Amber-Green assessment, for the onshore substation site selection process in Volume 1, Chapter 4: Site Selection and Consideration of Alternatives of the Environmental Statement (AS-026).</p>
RR-1616 1616.6	<p>1.5 The Council acknowledges and welcomes the Applicant's efforts to reduce and streamline certain aspects of its Project design since its consultation on the Preliminary Environmental Information Report (PEIR). Nevertheless, certain crucial aspects are yet to be addressed or justified. For example, the maximum height of the Morecambe substation has decreased from 20 meters to 13 meters, but the equivalent metric for the Morgan substation has decreased from 20m to only 15m. There is no explanation provided for this distinction. These heights exclude the significantly taller lightning protection masts that will be positioned across both substation locations. These heights are higher than any building within the Green Belt or any of the surrounding residential centres. In addition, the temporary access track width for both substations has been increased from 15 meters to 20 meters.</p>	<p>The Applicants have identified the maximum main building height dimensions of each of the onshore substations within Table 3.26 of Volume 1, Chapter 3: Project Description of the Environmental Statement (AS-024).</p> <p>The maximum main building height for each of the onshore substations differs due to the expected maximum generating capacity associated with different numbers of electrical circuits of the respective offshore wind farms (approximately 1.5GW for the Morgan Offshore Wind Project and up to 480MW for Morecambe Offshore Wind Limited). These requirements mean that the Morgan Offshore Wind Project requires greater flexibility of maximum dimensions for its onshore substation in comparison to the Morecambe Offshore Windfarm.</p>

Reference	Relevant Representation Comment	Applicants' response
		<p>The outline Design Principles (APP-209) sets out the considerations that will inform the detailed design of the permanent works at each of the onshore substations, including their height, layout and maximum footprint. The detailed design of each of the substations will be developed substantially in accordance with the Outline ODP, as secured by Requirement 4(2) of Schedule 2A and Schedule 2B of the draft DCO (AS-004). These details will be submitted to and approved by the relevant planning authority prior to start of construction at each of the onshore substations.</p> <p>Table 3.26 of AS-024 also identifies 30 m as the maximum height of lightning protection at both of the onshore substation sites. Lightning rods have been assessed within section 10.12 of Volume 3, Chapter 10: Landscape and Visual Resources of the Environmental Statement, (APP-123).</p> <p>The Applicants note that the increase in width for the temporary access track to the onshore substation(s) is identified within Section 3.7.2 of Volume 1, Chapter 3: Project Description of the ES (AS-024). The increase in width was identified as necessary to facilitate utility connections from the public highway along the edge of the temporary access track to the onshore substation temporary construction compounds for the purposes of construction.</p>
RR-1616 1616.7	1.6 It is unclear why both substations could not be combined into a single site, where reasonable separation measures would ensure the independence of the Morgan and Morecambe lines. The placement of these substations in close proximity has the effect of doubling the environmental impacts. In addition, the choice of an 8 kilometre search zone for the placement of the substations is not explained, and the chosen site is situated at the very edge of this zone as shown in Figure 1 and Figure 2. The Mooir Vannin Offshore Windfarm	<p>The Applicants note that Volume 1, Annex 4.3: Selection and Refinement of the Onshore Infrastructure (AS-028) states that <i>"To maintain an aligned approach for the route planning and site selection of the onshore infrastructure, the Applicants aimed to site the substations in proximity to each other. The alignment of the siting of onshore infrastructure, through the site selection process has been undertaken to reduce impacts, for example to landowners and local communities."</i></p>

Reference	Relevant Representation Comment	Applicants' response
	<p>Project, a NSIP connecting from the Isle of Man to the Penwortham substation has not only demonstrated a search area (covering north to Fleetwood), but has also included the Hillhouse route (detailed in paragraphs 1.14 to 1.21 below) within its scope. If substations can be separated from the Penwortham substation, why couldn't they be further away? If distance has a greater impact due to a higher voltage cable between the substation and Penwortham, why was this not factored in to give greater weight to closer options rather than choosing a site at the limit of the chosen search area.</p>	<p><i>The identification of a site of sufficient size to accommodate both substations was therefore a key consideration and areas not of a suitable size were excluded through the process”.</i></p> <p>The conclusion of the heat mapping and zone appraisal within the site selection and consideration of alternatives process was that no single site was sufficient in size to accommodate both substations' maximum design parameters (Table 4.6 of AS-028).</p> <p>Section 4.5.3 of AS-028 states that: “<i>an initial 5 km buffer, was drawn around the POI at the National Grid Substation at Penwortham. This radius was used to minimise the length of the 400 kV grid connection cables that would link the new substations to the POI, to minimise cable reactive power issues, to mitigate transmission losses, and to minimise adverse effects on economic efficiency.</i></p> <p><i>An exercise was undertaken to identify zones within the 5 km buffer with the greatest potential to accommodate the Onshore Substations. Due to the presence of numerous constraints within 5 km (e.g. flood zones, priority habitat and high pressure gas mains), the search area buffer was increased to 8 km.”</i></p> <p>The selected onshore substation sites represent a combination of the acceptable distance between the onshore substations and the POI, and are sited to minimise potential impacts as identified in the Black-Red-Amber-Green assessment within AS-028, rather than giving a weighting to sites that are closer to the POI.</p>



Reference	Relevant Representation Comment	Applicants' response
	<p><b>Figure 1</b></p>  <p><b>Figure 2</b></p> 	
RR-1616 1616.8	<p>1.7 In terms of timing, the Council understands that the Morgan and Morecambe limbs of the Project may run to different timelines, which not only significantly prolongs the completion timeframe, but also</p>	<p>The Applicants acknowledge that the Transmission Assets have identified a number of potential construction scenarios which form the basis of the worst-case scenarios assessed in the Environmental Statement. These construction scenarios are outlined within Section 3.9.2 of Volume 1,</p>

Reference	Relevant Representation Comment	Applicants' response
	effectively doubles the disruption and environmental impacts resulting from the construction phase of the Project.	<p>Chapter 3: Project Description of the Environmental Statement (AS-024) and in the Rule 9 – ES assessment of Construction Scenarios (AS-070).</p> <p>A realistic worst case construction scenario has been identified within the Maximum Design Scenario for each impact assessment. The Examining Authority requested additional details on the robustness of the assessment of construction scenarios within the Rule 9 letter issued on 14th February 2025 (PD-005). The Applicants have provided further clarity on construction scenarios and the assessment of impacts within the response to the Rule 9 letter submitted on 21st March 2025: Rule 9 – ES assessment of Construction Scenarios (AS-070). AS-070 clarifies that for many of the impacts assessed concurrent construction represents the worst case and it is therefore an oversimplification to assert that where the projects run to different timescales (i.e. during sequential construction) this will double the disruption and environmental impacts. AS-070 sets out the worst-case construction scenario for each topic assessment chapter on an impact-by-impact basis.</p>
RR-1616 1616.9	1.8 The acquisition of farmland required for the construction of the two substations and the cable corridors will result in the permanent loss of agricultural land across Fylde, which is crucial for the viability of local farming activities, whether they be arable, dairy, or sheep farming. It is expected that over 45 farms along the cabling route will be adversely impacted by the Project. The land supports not only crop production but also livestock grazing, which are integral to the livelihoods of the farming community. Acquisition of farmland will not only disrupt business continuity and create long term adverse socio-economic harm to these vital businesses, but it will reduce the total land available for farming in the region and create economic hardship for farmers who may find it challenging to find suitable replacement land even if financially compensated.	<p>The Statement of Reasons (AS-009) acknowledges that some permanent loss of agricultural land is unavoidable in respect of the land required for the onshore substations. However, as set out in paragraph 1.7.1.13 of AS-009, where permanent land take is required for substations and associated infrastructure the Applicants have sought to minimise the amount of land to be permanently acquired by for example locating the substations within existing field and ownership boundaries where practicable.</p> <p>With regards to the cable corridors, the Applicants note that the onshore export cables and 400kv connection cables will be completely buried underground (as set out in the draft Development Consent Order, Schedule 1 Part 1 Authorised Development) (AS-004) and the majority of the cable corridor will be reinstated to pre-existing condition as far as reasonably practicable to allow agricultural use to resume following construction. The</p>

Reference	Relevant Representation Comment	Applicants' response
		<p>Outline Soil Management Plan (APP-200) sets out measures to protect soil quality and structure during construction, ensuring that the land remains viable for farming in the long term. This includes the production of an aftercare plan to be produced for agricultural areas within the Onshore Order Limits which will be subject to agreement with the Agricultural Liaison Officer and the affected landowner(s). This is secured in the draft Development Consent Order through Requirement 8 (Code of Construction Practice), which includes production of a Soil Management Plan in accordance with the Outline Soil Management Plan (APP-200) and Requirement 18 (Restoration of land temporarily used for construction) of the draft Development Consent Order Schedule 2A and 2B (AS-004).</p> <p>The Applicants are continuing to engage with landowners and occupiers with the aim of addressing and mitigating their concerns where practicable.</p>
RR-1616 1616.10	<p>1.9 In the short and medium-term, the construction of the substations and the additional works required to access and lay down the cables will result in significant land loss to dairy and livestock farms. This is due to the impacts of noise, disruption to the herds, impediments to access to pastures. As highlighted in paragraph 1.7 above, the two substations and cabling corridors are distinct and pertain to distinct projects, the sequencing and timing of the works may result in a construction timeline that extends beyond 6 years (up to 12 years). This uncertainty has a profound negative impact on the operational viability of the farms and the level of investment they receive from landowners and tenants.</p>	<p>The significance of the effect of the two onshore substations on farming activities is assessed Volume 3, Chapter 6: Land use and recreation (APP-104). The maximum design scenario (MDS) for the assessment assumes a sequential construction scenario as this represents the longest duration of temporary loss of agricultural land. With respect to onshore export cable corridor and 400 kV grid connection cable corridor, the duration of construction activities under any sequential construction scenario would be up to 66 months as set out in the Rule 9 – ES Assessment of Construction Scenarios (AS-070). Regardless of the construction scenario, both projects must commence construction before the 7 year implementation and compulsory acquisition periods set out in Requirement 1, Schedule 2A and Schedule 2B and Article 21 of the draft Development Consent Order (AS-004) expires. The Morecambe Offshore Wind Farm: Transmission Assets has a construction duration of up to 30 months or 2.5 years and the Morgan Offshore Wind Project: Transmission Assets has a construction duration of up to 36 months or 3 years and therefore the timeframe within which both projects would be constructed cannot extend out to 12 years.</p>

Reference	Relevant Representation Comment	Applicants' response
		<p>The Applicants assessment of impacts acknowledges the potential impacts on land holdings. The Applicants have made a number of commitments to seek to reduce impacts on land holdings which are identified in Table 6.17 of Volume 3, Chapter 6: Land use and recreation (APP-104). These are as follows:</p> <ul style="list-style-type: none"> <li>• The Applicants have made a commitment (CoT35 of Volume 1, Annex 5.3: Commitments Register of the ES (AS-030)) to measures to maintain and address issues relating to soil management which are outlined in the Outline CoCP. This is secured by Requirement 8 within Schedules 2A &amp; 2B of the draft Development Consent Order (AS-004). Detailed CoCP(s) will be implemented by the Applicants as approved by Requirement 8 within Schedules 2A &amp; 2B of the DCO in consultation with relevant stakeholders, as appropriate. An Outline Soil Management Plan has been submitted with the Application (APP-200).</li> <li>• The Applicants have made a commitment (CoT81 of Volume 1, Annex 5.3: Commitments Register of the ES (AS-030)) to enable temporary disruption to farm holdings to be reduced, wherever possible (in line with the Outline Soil Management Plan. This is secured by Requirement 8 within Schedules 2A &amp; 2B of the draft Development Consent Order (AS-004). Detailed Soil Management Plan(s) will be implemented by the Applicants as approved by relevant local authorities in consultation with relevant stakeholders, as appropriate. In addition, an Outline Construction Noise and Vibration Management Plan (APP-196) has been submitted with the Application.</li> <li>• The Applicants have made a commitment (CoT79 of Volume 1, Annex 5.3: Commitments Register of the ES (AS-030)) to the control and limitation of noise in line with the Outline Construction Noise and Vibration Management Plan (APP-196). This is secured by Requirement 8 within Schedules 2A &amp; 2B of the draft Development Consent Order (AS-004). Detailed Noise and</li> </ul>

Reference	Relevant Representation Comment	Applicants' response
		<p>Vibration Management Plan(s) will be implemented by the Applicants as relevant local authorities in consultation with relevant stakeholders, as appropriate.</p> <ul style="list-style-type: none"> <li>The Applicants have made a commitment (CoT88 of Volume 1, Annex 5.3: Commitments Register of the ES (AS-030)) to the implementation of Best Practicable Means during construction, operation and maintenance phases to ensure noise levels are limited. This is secured by Requirement 8 within Schedules 2A &amp; 2B and Requirement 10 within Schedules 2A &amp; 2B of the draft Development Consent Order (AS-004).</li> <li>Finally, the Applicants have made a commitment (CoT96 of Volume 1, Annex 5.3: Commitments Register of the ES (AS-030)) to the maintenance of farm access routes between fields in line with the outline CoCP. This is secured by Requirement 8 within Schedules 2A &amp; 2B of the draft Development Consent Order (AS-004). Detailed CoCP(s) will be implemented by the Applicants as approved by relevant local authorities DCO in consultation with relevant stakeholders, as appropriate.</li> </ul> <p>The Applicants are continuing to engage with landowners and occupiers with the aim of addressing and mitigating their concerns where applicable.</p>
RR-1616 1616.11	1.10 The Council understands that the Applicant is undertaking existing land drainage assessments, with a view to connect the Project into the surrounding land drainage systems. However, the surrounding land drainage systems have historically been designed to carry rainwater from permeable topsoil and subsoil, not from large hard standing substation pads. There are no apparent substation site designs that include internal storm tanks to collect and hold surface and roof water runoff in times of storm. Therefore, any internal or	<p>The Applicants have made a commitment (CoT11 of Volume 1, Annex 5.3: Commitments Register of the ES) (AS-030) to preparation of detailed Operational Drainage Management Plans which are to be developed in accordance with the Outline Operational Drainage Management Plan (APP-215). The detailed plans will include measures to limit discharge rates and attenuate flows to maintain greenfield runoff rates at the onshore substations are also included along with measures to control surface water runoff.</p>

Reference	Relevant Representation Comment	Applicants' response
	perimeter land drainage works that are proposed will not be able to cope with storm events.	<p>As noted in section 1.4.2 of the Outline Operational Drainage Management Plan (APP-215), surface water run-off from the Morgan and Morecambe onshore substations will be collected by perimeter drains and attenuated within water attenuation features (e.g. ponds), prior to controlled discharge to the Dow Brook. Additional Sustainable urban Drainage Systems (SuDS) components will be incorporated as necessary for source control and confirmed at the detailed design stage.</p> <p>The Operational Drainage Management Plan(s) are secured by Requirement 20 of Schedules 2A and 2B of the draft DCO (AS-004). The detailed Operational Drainage Management Plan(s) will be implemented by the Applicants as approved Lancashire County Council in consultation with the Environment Agency, as appropriate.</p>
RR-1616 1616.12	1.11 In the long-term, the buried cables will continue to pose challenges because the land is soft, mossy, and marshy. It is a well-documented and recognised risk that cables installations in such land will rise over time, which will compromise field operations. As the cables will be left in perpetuity, they will present a long-term hazard and liability to farming in the future with no planned mitigation strategy or provision from the Applicant. On a holistic level, the permanent loss of land challenges the long-term viability of these dairy farms due to restrictions in pasture availability relative to the size of the herds. As farm businesses operate in highly competitive markets, characterised by tight profit margins, the construction and operation of the two substations and cabling routes presents very real challenges in disrupting operations, and ultimately, threatening the existence of these businesses.	<p>The Applicants have undertaken a rigorous and robust route planning and site selection process in relation to the onshore infrastructure for the Transmission Assets, with a guiding principle of minimising the cable route through challenging ground conditions such as wetlands (see Volume 1, Annex 4.3: Selection and Refinement of the Onshore Infrastructure (APP-033)). The burial depth of the onshore cable will be informed by site specific information, including ground condition surveys, where required, to ensure that cable installations are appropriately designed. Additionally, the onshore export cables will be monitored remotely to determine if and where corrective activities may be required. Routine inspections can be expected to take place on an annual basis, for example to check for water egress at joint bays (see Section 3.15.2 of Volume 1, Chapter 3: Project description (AS-024)). After construction and once the land has been reinstated for the onshore export cable corridor and the 400kV grid connection corridor, the land will return to its previous condition, and so any farming activities will be able to continue during the operation and maintenance phase of the Project.</p>



Reference	Relevant Representation Comment	Applicants' response
		<p>Section 6.11.3 of Volume 3, Chapter 6: Land use and recreation (APP-104) sets out the assessment of potential temporary construction impacts from the Transmission Assets on farm holdings which identifies the implementation of commitments shown in Table 6.17 of the chapter (APP-104). The Applicants have made a commitment (CoT35 of Volume 1, Annex 5.3: Commitments Register of the ES (AS-030)) to measures to maintain and address issues relating to soil management which are outlined in the Outline CoCP. This is secured by Requirement 8 within Schedules 2A &amp; 2B of the draft Development Consent Order (AS-004). Detailed CoCP(s) will be implemented by the Applicants as approved by Requirement 8 within Schedules 2A &amp; 2B of the DCO in consultation with relevant stakeholders, as appropriate. An Outline Soil Management Plan has been submitted with the Application (APP-200). The Applicants have made a commitment (CoT81 of Volume 1, Annex 5.3: Commitments Register of the ES (AS-030)) to enable temporary disruption to farm holdings to be reduced, wherever possible (in line with the Outline Soil Management Plan. This is secured by Requirement 8 within Schedules 2A &amp; 2B of the draft Development Consent Order (AS-004). Detailed Soil Management Plan(s) will be implemented by the Applicants as approved by relevant local authorities in consultation with relevant stakeholders, as appropriate. Taking into account these measures, Paragraph 6.11.3.24 of Chapter 6 (APP-104) concludes that there would be a long term temporary moderate adverse effect on farm holdings, which is significant in EIA terms.</p> <p>The permanent impacts of the Transmission Assets on farm holdings that have the potential to give rise to likely significant effects are described in paragraphs 6.11.3.6 to 6.11.3.23 of Volume 3, Chapter 6: Land use and recreation (APP-104). The permanent impact of the Transmission Assets is predominantly associated with the land required permanently for the onshore substations and the changes that would be required in the operation of two of the farm holdings, both intensive dairy units, due to the loss of land used for grazing and silage production. However, with the implementation of a suitable package of measures to be agreed in consultation with the farmers to facilitate the required adjustments to the</p>



Reference	Relevant Representation Comment	Applicants' response
		operation of these enterprises, it is assessed that the construction of the Transmission Assets would not compromise the continued operation of these two farm enterprises.
RR-1616 1616.13	1.12 On a related vein, there will also be significant impacts on small local businesses and enterprises. For example, we are concerned that the Wrea Green Equestrian Centre Riding School aimed at creating a recreational space for the disabled community will likely close due to the adverse negative impacts on the horses caused by the construction and operation of the substations and cable corridors. Elevated stress levels in horses as a result of noise and vibration impacts could present safety risks for the riders. Closure of the equestrian centre would have a detrimental social and economic impact on the local community, particularly the disabled, who depend on it for recreation, education, and therapy.	<p>The Applicants are committed to developing the Morgan Offshore Wind Project and Morecambe Offshore Windfarm in a way that is sensitive to the environment, minimising potential effects to the local community and specific receptors, wherever possible.</p> <p>As part of the application, the Applicants have assessed potential impacts associated with noise and vibration, socio-economics and land use and recreation. The outcomes of the assessment for each of these topic areas has been assessed and are reported in the Environmental Statement.</p> <p>Section 6.11.4 of Volume 3, Chapter 6: Land Use and Recreation (APP-104) has assessed the potential impact on recreational resources (including Wrea Green Equitation Centre) and concluded that with appropriate mitigation secured through the DCO, the potential effects would be minor adverse, which is not significant in Environmental Impact Assessment (EIA) terms.</p> <p>Based on noise and vibration modelling contained within Volume 3, Annex 8.2: Construction noise and vibration of the Environmental Statement (APP-119), low magnitude impacts are predicted at Wrea Green Equitation Centre (in EIA terms), based on the model of noise generating activity (e.g. establishing access and temporary construction compounds joint bay excavation, construction or backfill). The Applicants are confident that with the application of mitigation within Section 1.2 of the outline Noise and Vibration Management Plan, that potential construction impacts to the equitation school can be appropriately managed via the suite of noise attenuation techniques available (APP-196, which form part of the Outline</p>

Reference	Relevant Representation Comment	Applicants' response
		<p>Code of Construction Practice (CoCP) (see CoT35, of Volume 1, Annex 5.3: Commitments Register) (AS-030).</p> <p>Noise control measures will be consistent with the recommendations of the current version of BS 5228 - Part 1: Noise and Part 2: Vibration. Statutory requirements and legislation will be fully complied with during the construction works. Measures that are specific to the potential impacts on the Wrea Green Equitation Centre include:</p> <ul style="list-style-type: none"> <li>• The use of plant fitted with measures which may reduce potential noise emissions, for example those with effective silencers, noise insulation, those with acoustic enclosures, or reduced sound models;</li> <li>• Activities will be designed to be undertaken with any directional noise emissions pointing away from noise-sensitive receptors, where practicable</li> <li>• Use of local noise screening or site hoardings will be used to reduce noise, where necessary and practicable</li> <li>• The appointment of a site contact to whom complaints/queries about construction activity can be directed - any complaints should be investigated, and action taken where appropriate;</li> <li>• Where noise complaints are received, construction noise and vibration monitoring may be undertaken at the relevant receptors to ensure the threshold values are not exceeded and notify the principal contractor if exceedances occur;</li> <li>• Site personnel will be informed about the need to minimise noise as well as about the health hazards of exposure to excessive noise. Their training should include advice relating to the proper use and maintenance of tools and equipment, the positioning of machinery on site to reduce noise emissions to neighbouring residents, as well as ensuring, where possible, that unnecessary</li> </ul>

Reference	Relevant Representation Comment	Applicants' response
		<p>noise is avoided when carrying out manual operations and operating plant and equipment;</p> <ul style="list-style-type: none"> <li>No audible music or radios will be played on the construction sites; and</li> <li>Information on communication will be provided in the Communications Plan, an outline of which is provided in the Outline Communications Plan (APP-194). This includes a commitment that all necessary parties (including local residents and businesses, such as Wrea Green Equitation Centre) will be informed when construction works will take place. Information provided will include information on the general location of the activities, and the expected duration.</li> </ul> <p>The CoCP(s) are secured by Requirement 8 of Schedules 2A and 2B of the draft DCO (AS-004). Detailed Construction Noise and Vibration Management Plan(s) will be implemented as approved by the relevant local planning authorities in consultation with the relevant stakeholders, as appropriate.</p> <p>The mitigation measures will be actively reviewed throughout the construction phase, where necessary, to ensure that they are effective. The Applicants believe that the Wrea Green Equitation Centre will not need to close in response to the proposals associated with the Transmission Assets.</p>
RR-1616 1616.14	1.13 The Council is concerned that approval of the Applicant's Project as proposed would have the effect of downgrading the weight of consideration to be afforded to Green Belt land, resulting in urban sprawl and a gradual loss of green belt protections which contravenes with the NPPF and multiple NPS as highlighted above. Furthermore, it would disregard a number of strategic and non-strategic development	Please refer to the Applicants' response to 1616.2.

Reference	Relevant Representation Comment	Applicants' response
	policies in the FLDP concerning the use of Green Belt land, protection of existing open spaces, Fylde's economy, tourism, leisure and community facilities. The Council would iterate that violations of the FLDP, as the primary framework document that establishes the vision and direction for development within its boundaries as approved by the Secretary of State, should not be taken lightly. As an alternative, the Council strongly advocates for and advises the Applicant to withdraw the application and promote the Hillhouse alternative set out below instead.	
RR-1616 1616.15	<i>Alternative – Hillhouse Technology Local Enterprise Zone</i> 1.14 The Local Development Frameworks across the Fylde Coastal Plain have provisioned 3 Local Enterprise Zones (LEZ) with infrastructure, utilities connectivity and planning support to facilitate development such as the Project being proposed by the Applicant. These also offer close and even adjacent access, re-use and upgrade of existing electricity transmission infrastructure which provides connectivity to the Penwortham substation, without additional further major planning, given its status and existing easement portfolio. These LEZs are segregated from countryside and residences, whilst being designed for multi-activity commercial use.	<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 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</p>

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


Reference	Relevant Representation Comment	Applicants' response
		<p><i>include the onshore connection points for offshore transmission and potential future Multi-Purpose Interconnector opportunities. Government recognises the work undertaken in the HND; the HND and subsequent network design exercises are likely to contain information that is important and relevant in the consideration of applications for infrastructure resulting from those exercises.</i></p> <p><i>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.</i></p> <p><i>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."</i></p> <p>See also paragraph 2.15:          '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</p>

Reference	Relevant Representation Comment	Applicants' response
		<p>Wind Project and Morecambe Offshore Windfarm. This process included the existing Middleton (see Section 7 of the HND) and Stanah (adjacent to the Hillhouse Enterprise Zone) substations, as confirmed to the House of Commons by Parliamentary Under Secretary of State (Department for Energy Security and Net Zero) on 17 December 2024:</p> <p>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.</p> <p>2. In contrast, Penwortham had a more accessible footprint, fewer constraints, and better electrical connectivity to the wider network".</p> <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
		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.
RR-1616 1616.16	1.15 There is no evidence submitted by the Applicant to suggest that the Hillhouse Technology LEZ (HTEZ) has been considered as a component of the land route to Penwortham, which would be via the Stanah substation. This 138-hectare site has been specifically allocated to support development in the energy sector, so could accommodate the 22.35 hectares of the proposed designs of the 1.5GW Morgan and the 0.5GW Morecambe converter substations, their respective construction compounds, road networks, utilities infrastructure, etc. It currently houses infrastructure for the Walney2 Offshore wind farm and has a direct connection with the National Grid Stanah substation with space for any increased capacity requirements.	Please refer to the Applicants' response to 1616.15.
RR-1616 1616.17	1.16 An informal examination of the Stanah substation has revealed that the existing overhead power lines and substation would need to be upgraded. However, the Stanah substation is connected to the main North-Southwest branch of the Grid that runs between Heysham and Penwortham, with the T junction being at Hambleton, whilst the east branch runs beside the M6 and then around Preston to the West before also feeding into Penwortham.	Please refer to the Applicants' response to 1616.15.
RR-1616 1616.18	1.17 Furthermore, the Council would point to the fact that National Grid have notified residents and landowners around Stanah, North Fylde and Hambleton of their intent to upgrade the Stanah substation and Tee to permit carriage of increased power levels, matching the grid loop from Heysham to Penwortham.	Please refer to the Applicants' response to 1616.15.

Reference	Relevant Representation Comment	Applicants' response
RR-1616 1616.19	1.18 This option offers a shorter land route whose connection could be upgraded comparatively easily, if the existing overhead pylons are re-strung to increase power carrying capacity with an increased number of conductors attached, potentially with reinforcement of the pylons. All easements for access to the existing overhead lines already exist, and an upgrade would not require major planning activity. The owners of the Hillhouse site are pursuing the development 32389236.1 6 of a Green Hydrogen facility at Stanah, using the underground Halite Caves on the East Side of the Wyre for storage.	Please refer to the Applicants' response to 1616.15.
RR-1616 1616.20	1.19 The HTEZ route would also be in alignment with NPS EN-5, with reference to section 9 of the Electricity Act 1989 (as amended), as the Applicant has a duty to develop and maintain and develop and efficient, coordinated and economical system of electricity distribution. To use existing infrastructure as part of this would undoubtedly mean streamlined costs, enabling the consumer to receive electricity at the lowest cost. There is evidence available that the proposal to utilise Stanah would achieve a substantial net cost saving overall of some £400 million, based on 2012 published data, compared to the current proposed underground connection across South Fylde.	Please refer to the Applicants' response to 1616.15.
RR-1616 1616.21	1.20 The Council recommends that the applicant investigate and carry out a detailed assessment of the possibility of this alternative route and location of substation, especially whether power from either or both of the Morgan and Morecambe developments or Mooir Vannin proposed developments can be supported by the Stanah HTEZ route, based on a normal generation of 40% capacity. Any surplus power could be used on site to support the hydrogen production facility. Figure 3 illustrates the more simplified route when considering the Stanah Grid substation connection.	Please refer to the Applicants' response to 1616.15.

Reference	Relevant Representation Comment	Applicants' response
	<p><b>Figure 3</b></p> 	
<p>RR-1616 1616.22</p>	<p>In summary, should the Morgan and Morecambe windfarms opt to connect to the Hillhouse site, this would bring about the following benefits:</p> <p>1.21.1 A route that only requires drilling underground for 4 kilometres.</p> <p>1.21.2 Although it will require upgrading the lines and pylons from Stanah to the Grid, this should be much cheaper than the proposed 30 kilometre corridor. 32389236.1 7</p> <p>1.21.3 Hillhouse is a brownfield site and is outside the Green Belt and is therefore a much more preferable alternative to avoid the Green Belt and maintain separation between rural communities.</p> <p>1.21.4 Springfields (Westinghouse) are seeking to develop large-scale hydrogen production at Hillhouse, which would be a good use of the spare capacity in the local area for local benefit. The current corridor only exports to the National Grid, with no local benefit.</p> <p>1.21.5 The Fleetwood MP and Town council see this as an opportunity for growth in HTEZ.</p> <p>1.21.6 Investment in this area will also attract extra skilled jobs into Fleetwood Town Council (one of the most deprived areas in</p>	<p>The Applicants have undertaken a rigorous and robust route planning and site selection process as presented in Volume 1, Chapter 4: Site selection and consideration of alternatives (AS-026). Following the identification of the Point of Interconnection (Penwortham) for both Morgan and Morecambe, the Applicants followed the sequential process set out in section 4.7.1 onwards to identify suitable locations for landfall and the cable corridors and onshore substations. The site selection chapter explains in detail the numerous options considered and the reasons for the final chosen locations. The alternatives were also subject to non-statutory and statutory consultations and feedback received was taken into account in the final route.</p> <p>For further detail please refer to responses at 1616.2, 1616.7 and 1616.15 above.</p>

Reference	Relevant Representation Comment	Applicants' response
	Lancashire) and into the port for the offshore work that would be needed to support the windfarms	
RR-1616 1616.23	<b>Cumulative Impacts</b> 2.1 The Newton with Clifton Parish comprises of rural countryside with two main settlements: 2.1.1 Newton with Scales being approximately 125 acres; and 2.1.2 Clifton being approximately 60 acres.	The Applicants note this response.
RR-1616 1616.24	2.2 At present, the Springfields nuclear fuel energy site, in conjunction with numerous solar energy projects located to the north of Clifton, at Clifton Marsh, and at Halls Cross, already entails the allocation of a total of 225 acres for green energy in Newton and Clifton Parish, with an additional 42 acres situated in close proximity. 2.3 The Project, if consented as proposed, would add two additional substations in addition to the existing 170-acre solar farm application at Clifton Marsh, south of the A584, and a 79-acre solar farm application to the west of Parrox Lane which are also in the process of being considered by Fylde Borough Council.	The Applicants note the comments made regarding other projects in proximity to the Transmission Assets.  Volume 1, Annex 5.5: Cumulative Screening Matrix and Location Plan of the Environmental Statement (APP-039) provides details of the methodology for identification of cumulative projects for consideration and have identified where cumulative impacts have the potential to give rise to likely significant effects for specific impact assessments topic areas within the Cumulative Effects Assessment (CEA). It also provides the CEA long list (both onshore and offshore) and cumulative effects screening matrix.
RR-1616 1616.25	2.4 This is a high concentration of energy generation projects within a limited radius, which would significantly alter the long-standing character of the rural settings in a short period of time, which should further count against the project as a cumulative impact. Given that PINS has recognised Moor Vanin as a NSIP, this brings into question whether an energy super highway is being built in order to satisfy future input into the National Grid.	An assessment of the potential cumulative impacts of the Transmission Assets on landscape character is contained within Volume 3, Chapter 10: Landscape and Visual Resources (APP-123). The assessment concludes a minor residual impact (which is not significant in Landscape and Visual Impact terms) following the implementation of the landscape proposals secured by Requirement 6 (Provision of landscaping) of Schedule 2A and Schedule 2B of the draft Development Consent Order (AS-004).  Both the Morgan Offshore Wind Project and the Morecambe Offshore Windfarm were scoped into the 'Pathways to 2030' workstream under the

Reference	Relevant Representation Comment	Applicants' response
		<p>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 the Holistic Network Design Review (HND). 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> <p>It is not the responsibility of the Applicants to evaluate the potential routing options to enable connection of other energy generation projects to the National Grid.</p> <p>The Mooir Vannin Offshore Wind Farm has been identified in Table A.9 of Volume 1, Annex 5.5: Cumulative Screening Matrix and Location Plan of the Environmental Statement (APP-039), and has been assessed in the cumulative effect assessment in specific topic chapters, where relevant.</p>
RR-1616 1616.26	<p><b>Deficient Community Engagement and Consultation</b></p> <p>3.1 The consultation outcome may have been at risk of having been predetermined. For example, there was a consultation on the proposed landfall site at Blackpool Airport, but this was already decided by the Holistic Network Design carried out by National Grid in 2022. Similarly, the decision to make Penwortham substation the end point did not occur as a result of consultation or engagement as no such dialogue took place with stakeholders or communities impacted by 32389236.1 8 the Project. All other potentially viable route options have been disregarded in favour of the proposed 30-kilometre corridor.</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 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</p>

Reference	Relevant Representation Comment	Applicants' response
		<p>route as set out in the Consultation Report (APP-170) and its annexes (APP-171 to APP-188).</p> <p>The Applicants have set out their position on HND within 1616.15.</p>
RR-1616 1616.27	<p>3.2 The consultation on the PEIR did not comply with the legal definition of 'preliminary environmental information' at regulation 12(2) of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017, in that information that the applicant possessed was not included. For example, landowners were shown more precise details of the substations on maps prior to the statutory consultation process and events, and those detailed maps were not provided in the PEIR.</p>	<p>The Applicants confirm that the consultation on the Preliminary Environmental Information Report (PEIR) was undertaken in accordance with the requirements of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (EIA Regulations 2017), including Regulation 12(2). The Applicants also note that in relation to adequacy of consultation the Planning Inspectorate has confirmed in their Acceptance Checklist (s55) (PD-003) that it 'is satisfied that the Applicants have complied with their statutory obligations'.</p> <p>The PEIR provided consultees with the information reasonably required to develop an informed view of the likely significant environmental effects of the development, as required by regulation 12(2)(b). The level of detail included in the PEIR was proportionate to its purpose as a preliminary assessment of environmental impacts based on the information available at the time and was consistent with standard practice for projects being consented under the Planning Act (2008).</p> <p>The Applicants engaged with affected landowners throughout the non-statutory and statutory consultation process. These discussions focused on matters specific to individual landholdings, including the potential impact of the Transmission Assets. As is common practice, landowners were provided with plans that showed relevant details in relation to their own landholdings and land interests. However, these discussions did not introduce additional environmental information beyond that which was included in the PEIR.</p> <p>The statutory consultation process, including the PEIR, was designed to ensure that all consultees, including landowners, local communities and statutory consultees, had access to the same relevant environmental information. The indicative locations of the proposed onshore substations</p>



Reference	Relevant Representation Comment	Applicants' response
		<p>were shown within the onshore substations consultation area, and were subject to ongoing refinement following feedback from consultation and further technical and environmental assessments.</p> <p>This approach taken by the Applicants is in accordance with regulation 12 of the EIA Regulations (2017) and the Planning Act (2008).</p>
RR-1616 1616.28	<p>3.3 Furthermore, at consultation events, no-one present was sufficiently qualified to answer questions from attendees, and thus the events were merely presentation of proposals rather than any attempt at engagement, the purpose of pre-application consultation. The consultation events were held too late in the process to allow the consultees to prepare their responses. The decision to open the consultation on October 12 and only hold the first event on October 26 suggests a strategy designed to obstruct any meaningful consultation.</p>	<p>The Applicants complied with all consultation requirements, as has been set out in the Consultation compliance checklist (APP-172). The Application would not have been accepted had the Planning Inspectorate found otherwise.</p> <p>The Applicants therefore strongly refute any suggestion that the consultation process was designed to obstruct meaningful consultation or lacked proper engagement.</p> <p><u>Consultation Events</u> A wide range of subject matter experts were present at consultation events. These experts were able to discuss various aspects of the project, answer questions and clarify details for attendees. Additionally, contact details and feedback forms were provided to enable attendees to seek further information following the events.</p> <p><u>Consultation Events and Accessibility</u> The statutory consultation ran from 12 October 2023 to 23 November 2023, exceeding the statutory minimum requirement and providing consultees with ample opportunity to review the materials and submit feedback. The first consultation exhibition was held on 13 October 2023, the day after the consultation opened, ensuring that in-person engagement was available at the earliest opportunity. The remaining events were distributed across the consultation period, concluding on 16 November 2023, seven days before the consultation closed, allowing time for consultees to submit informed responses.</p>



Reference	Relevant Representation Comment	Applicants' response
		<p>A variety of consultation methods were made available, including:</p> <ul style="list-style-type: none"> <li>• Five exhibition events held at different times and locations, including a Saturday session, to accommodate various attendees' schedules. These events saw over 900 attendees in total.</li> <li>• Two pop-up events in high-footfall areas (St Annes Farmers Market and a Penwortham Farmers Market), held on both a weekday and a weekend to ensure a broad reach.</li> <li>• A webinar on 6 November 2023, providing a virtual option for engagement, which included a live Q&amp;A session and remained available online for later viewing.</li> <li>• Multiple feedback channels, including an interactive online map, email, freepost address, and a telephone enquiry line that allowed the public to request information, including printed materials.</li> </ul> <p>At all consultation events, attendees were provided with a range of materials, including:</p> <ul style="list-style-type: none"> <li>• Event panels explaining the proposals, feedback mechanisms and next steps,</li> <li>• Maps of the Project area, brochures, copies of the PEIR and the PEIR Non-Technical Summary and</li> <li>• The ability to submit feedback through forms provided at the events or through digital means.</li> </ul> <p>Additionally, every consultee who submitted feedback received an acknowledgment, and the themes raised during consultation are summarised in the Consultation Report (APP-170).</p> <p><u>How feedback was considered</u></p> <p>In most cases, comments raised during consultation were addressed through provision of further information or clarification provided either in the ES chapters submitted with the application or through post-PEIR stakeholder engagement. In some cases, design decisions were made in direct response to consultation feedback received. In other instances, no</p>

Reference	Relevant Representation Comment	Applicants' response
		<p>changes were necessary or have occurred. Details surrounding how responses received during statutory consultation were considered is detailed in section 4.7 of the Consultation Report (APP-170). The consultation process was designed to ensure that all stakeholders, including members of the local community, had meaningful opportunities to engage.</p> <p><u>Consultation Process</u>  The Applicants consider that the consultation process was comprehensive, accessible, and fully compliant with statutory requirements. Events were well-attended, well-staffed, and designed to facilitate informed engagement. The scheduling of events, including an early consultation exhibition, online engagement options and varied feedback mechanisms, ensured that consultees had sufficient time to review materials and respond effectively.</p>
RR-1616 1616.29	<p>3.4 Indeed, both Fylde Borough Council and Lancashire County Council refused to issue an Adequacy of Consultation Notice in autumn 2024. It is understood that the Applicant 's failure to clearly set out any community benefits in respect of carrying out the Project and their lack of commitment to address this prior to consultation was one of the reasons for Fylde Borough Council's refusal to grant an Adequacy of Consultation Notice. In the Council's view, the Applicant is unable to clearly list any direct community benefits because these are few, if any, which are outweighed by the disadvantages as highlighted throughout this RR.</p>	<p>The Applicants acknowledge that Fylde Borough Council and Lancashire County Council stated in their Adequacy of Consultation Responses (AoC-008 and AoC-009 respectively) that the Applicants had not adequately consulted under section 42 and section 47 of the Planning Act 2008 (the 2008 Act). However, the Planning Inspectorate (PINS) independently assessed the adequacy of consultation and determined that the Applicants had met their statutory consultation obligations under sections 42, 47, and 48 of the 2008 Act, as set out in the Acceptance Checklist (section 55) (PD-003).</p> <p><u>Section 42 Consultation</u>  Fylde Borough Council raised concerns over the section 42 consultation, and that some landowners were not consulted, but as confirmed in the Acceptance Checklist (PD-003), and detailed in Chapters 4.2 and 4.3 of the Consultation Report (APP-170), the Applicants undertook an iterative process to identify affected landowners, including those newly identified, and engaged with them accordingly. PINS reviewed this process and was</p>

Reference	Relevant Representation Comment	Applicants' response
		<p>satisfied that the Applicant met the requirements of section 42(1)(d) of the 2008 Act.</p> <p><u>Section 47 Consultation</u>  Both Fylde Borough Council and Lancashire County Council also questioned whether the consultation provided enough detail for consultees to make meaningful comments under section 47 of the 2008 Act. PINS reviewed the consultation materials, including the Preliminary Environmental Information Report, and concluded that the level of detail provided was sufficient to allow consultees to understand and provide feedback on the proposed development (PD-003).</p> <p><u>Adequacy of Consultation</u>  PINS considered all Adequacy of Consultation responses and determined that any additional concerns raised did not impact the acceptance decision, as they do not bear directly on the adequacy of consultation. The Application was therefore accepted, and any remaining issues will be considered during the Examination.</p> <p><u>Community Benefits</u>  The Project will contribute to the UK's net-zero targets, provide jobs and support infrastructure investment. The Applicants remain committed to ongoing engagement with local authorities and stakeholders and have demonstrated full compliance with statutory consultation requirements. Throughout non-statutory and statutory consultation, the Applicants have stated that a Community Benefit Fund will be established. The Department for Energy Security and Net Zero has recently published its guidance on Community Funds for Transmission infrastructure. The Applicants will take cognisance of this guidance in the creation of a fund and liaise with the Local Planning Authorities on its establishment.</p>
RR-1616 1616.30	<b>Ecology</b>	<p>The protection of sand lizards (<i>Lacerta agilis</i>) under Schedule 5 of the Wildlife &amp; Countryside Act 1981 (as amended) and under Schedule 2 of the</p>

Reference	Relevant Representation Comment	Applicants' response
	<p>4.1 The sand dunes at Lytham St Annes are home to the Sefton Sand Lizards (<i>Lacerta agilis</i>), one of the rarest lizard families in the UK. These reptiles are strictly protected under Schedule 5 of the Wildlife &amp; Countryside Act 1981 (as amended) and under Schedule 2 of the Conservation (Natural Habitats &amp;.) Regulations 1994 (as amended). Following a decline in numbers during the 1960s, attributed to the loss of habitat, among other factors, the recent decade has witnessed significant conservation efforts, leading to an increase in populations that could potentially be jeopardized if not carefully considered.</p>	<p>Conservation (Natural Habitats) Regulations 1994 (as amended) is noted within Volume 3, Chapter 3: Onshore ecology and nature conservation (APP-075).</p> <p>Due to the presence of sand lizards within the sand dunes at Lytham St. Annes Dunes SSSI (along with other key constraints at the landfall), the offshore export cables will be installed using trenchless techniques to avoid direct habitat damage or disturbance, with exit points for the installation at least 100 m from the nearest sand dunes. The Applicants have made a commitment (CoT44 of Volume 1, Annex 5.3: Commitments Register of the ES (AS-030)) to locating the exit pits associated with the direct pipe installation will be at least 100 m seaward of the western boundary of the SSSI. This is secured by Requirement 8 within Schedules 2A 7 2B of the draft Development Consent Order (AS-004).</p>
RR-1616 1616.31	<p>4.2 The Project proposes to permanently remove four ponds as part of constructing the substations. Given that the Fylde is very flat and wet, it provides an ideal habitat for Great Crested Newts, which would be directly impacted by these works. This presents a significant risk, given the recent discovery of Great Crested Newt populations in an adjacent field.</p>	<p>The impacts of construction, operation and maintenance and decommissioning on great crested newts (GCN) have been considered, taking into account desk study data and survey data from April 2022 until June 2024. This is summarised in Volume 3, Annex 3.8: Great crested newt and reptile survey technical report (APP-082).</p> <p>Whilst the Transmission Assets will potentially impact GCN breeding habitat, under District Level Licencing (DLL) requirements for GCN, it is compulsory that any suitable habitat must be fully mitigated, and the cost of the licence will be used for creating habitats in other appropriate areas. The Applicants have made a commitment (CoT92 of Volume 1: Annex 5.3: Commitments Register (AS-030)) to join the Lancashire DLL scheme in relation to GCN. This is secured under Requirement 12 of Schedules 2A and 2B of the draft DCO (AS-004)). The Habitat Suitability Index (HSI) and Environmental DNA (eDNA) surveys were undertaken (within the boundary of Transmission Assets plus a 250 m buffer) to support the application and to inform proportionate compensation via the DLL scheme (Volume 3,</p>

Reference	Relevant Representation Comment	Applicants' response
		<p>Annex 3.8: Great crested newt and reptile survey technical report (APP-082)). The suitability of the Project as a part of the DLL scheme was discussed as part of Expert Working Group 2 held in September 2023 with the relevant statutory stakeholders and received no objection in principle. The DLL approach is a strategic approach which ensures GCN conservation is targeted where it is most valuable.</p> <p>The Outline Ecological Management Plan (APP-212) includes details of proposed mitigation measures associated with the direct loss of any ponds within the Transmission Assets Order Limits. Where necessary, new ponds will be created in advance of construction at locations south and west of Morgan onshore substation and at Moss Side. Detailed Ecological Management Plan(s) will be developed in accordance with the Outline Ecological Management Plan and will be secured by Requirement 12 of Schedules 2A &amp; 2B of the draft DCO (AS-004).</p>
RR-1616 1616.32	<p>4.3 A few metres away from the location of the proposed substations, there exists a significant population of critically endangered Black Tailed Godwits on the Newton Marsh SSSI. Similarly, it has been recorded that Black Tailed Godwits were nesting on Freckleton Marsh which lies adjacent to the fields. Both Great Crested Newts and Black-Tailed Godwits should be recognized in the DCO for special protection.</p>	<p>Please see response 1616.31 above in relation to Great Crested Newts.</p> <p>A desk study and a series of breeding and wintering bird surveys were carried out to support the application (see Volume 3, Annex 4.1 Breeding birds technical report (APP-091), Volume 3, Annex 4.2: Wintering and migratory birds technical report (APP-092) and (APP-093), and Volume 3, Annex 4.3: Onshore and intertidal ornithology – intertidal birds technical report (APP-094)). These included sourcing records from the British Trust for ornithology (BTO), and Fylde Bird Club between 2014 and 2023. The breeding bird and wintering bird surveys covered the area within and around Freckleton Marsh and part of the Newton Marsh SSSI which lies wholly outside of the Order Limits. The survey area covered all suitable habitat within a 500 m buffer of the Order Limits to cover habits that could be affected by disturbance. The Applicants presented the methodology used for the site-specific surveys to the relevant stakeholders during the Evidence Plan Process and no concerns were raised on the survey area</p>

Reference	Relevant Representation Comment	Applicants' response
		<p>(which included the buffer zone). The desk study confirmed the known presence of black-tailed godwit at Newton Marsh SSSI while the site-specific surveys enabled the identification of the occurrence of wintering black-tailed godwit across the Transmission Assets Order Limits. One territory of the Schedule 1 species, black tailed godwit was identified within Newton Marsh SSSI which is partially included in the survey area but well outside (approximately 500 m) of the Onshore Infrastructure Area. It is also noted that evidence of successful breeding was reported in 2022 and 2023 within Newton Marsh SSSI, which is a stronghold for this species. As the onshore export cable corridor will be situated approximately 500 m to the north of the SSSI with a series of pasture fields and hedges, and a busy dual carriageway (A584) between any works and the Newton Marsh SSSI, the Applicants concluded that will be no impacts upon black-tailed godwit within Newton Marsh SSSI.</p> <p>No potential impacts to the Newton Marsh SSSI are expected in relation to the Project (Volume 3, Chapter 4: Onshore and intertidal ornithology (APP-090)). Potential impacts from the Project on non-breeding waders (of which black tailed godwit was one species) were also assessed within Volume 3, Chapter 4: Onshore and intertidal ornithology (APP-090). The assessment concluded that there would be no more than a low potential impact on non-breeding waders (including black-tailed godwit).</p> <p>The Applicants have made a commitment (CoT120 of Volume 1, Annex 5.3: Commitments Register of the ES (AS-030)) to provide mitigation areas south of Newton-with-Scales for waders (of which Black-Tailed Godwits are one) including the creation of scrapes and thickening of hedgerow. This is secured by Requirement 12 within Schedules 2A &amp; 2B of the draft Development Consent Order (AS-004). This mitigation requires approval of detailed Ecological Management Plan(s). The Applicants have made a commitment (CoT76 of Volume 1, Annex 5.3: Commitments Register of the ES (AS-030)) to develop Detailed Ecological Management Plan(s) in line with the Outline Ecological Management Plan (APP-212). This is secured</p>

Reference	Relevant Representation Comment	Applicants' response
		<p>by Requirement 12 within Schedules 2A &amp; 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.</p> <p>The Applicants note that the need for EPS licences and the type of licences required will be determined by the pre-construction surveys. The Applicants also confirm that the stage of construction will not commence until after the licence has been granted (as secured in Requirement 13 of Schedules 2A &amp; 2B of the draft DCO (AS-004)).</p>
RR-1616 1616.33	4.4 The cable corridors for the Project traverse through the biological heritage site of Lytham Moss, which comprises 283 hectares of farmland on the Lytham Moss between Heyhouses, Long Wood and Peel. The site is of ornithological importance as a winter feeding ground for pink footed geese and whooper swans.	<p>An assessment of the local populations of pink-footed goose <i>Anser brachyrhynchus</i> and whooper swan <i>Cygnus cygnus</i> has been included in Volume 3, Chapter 4: Onshore and intertidal ornithology (APP-090).</p> <p>The assessment methodology involved undertaking a desk study in addition to site-specific breeding and wintering bird surveys within Lytham Moss Biological Heritage Site (see Volume 3, Annex 4.1 Breeding birds technical report (APP-091), Volume 3, Annex 4.2: Wintering and migratory birds technical report (APP-092) and (APP-093), and Volume 3, Annex 4.3: Onshore and intertidal ornithology – intertidal birds technical report (APP-094). No breeding territories related to these two species were found within the survey area. The assessment of potential impacts concluded there would be a negligible residual effect on non-breeding geese and swans in the onshore survey area, as set out within Volume 3, Chapter 4: Onshore and intertidal ornithology (APP-090).</p> <p>Where construction activities are proposed along the onshore export cable corridor, the Project has proposed a mitigation area which 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</p>



Reference	Relevant Representation Comment	Applicants' response
		<p>may comprise retention of spoiled crop and/or the import of additional feed, 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 provide mitigation areas south of Newton-with-Scales for waders including the creation of scrapes and thickening of hedgerow. This is secured by Requirement 12 within Schedules 2A &amp; 2B of the draft Development Consent Order (AS-004). Further, the Applicants have made a commitment (CoT76 of Volume 1, Annex 5.3: Commitments Register of the ES (AS-030).) to develop Detailed Ecological Management Plan(s) in line with the Outline Ecological Management Plan (APP-212). This is secured by Requirement 12 within Schedules 2A &amp; 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.</p> <p>The Applicants note that the need for EPS licences and the type of licences required will be determined by the pre-construction surveys. The Applicants also confirm that the stage of construction will not commence until after the licence has been granted, where impacts have been identified (as secured in Requirement 13 of Schedules 2A &amp; 2B of the draft DCO (AS-004)).</p>
RR-1616 1616.34	<p>4.5 Furthermore, a range of protected species can be found near the area of the substations. These include:</p> <p>4.5.1 Bats (pipistrelle)</p> <p>4.5.2 Toads</p> <p>4.5.3 Ring Ouzel</p> <p>4.5.4 Thrush</p> <p>4.5.5 Dunnock</p> <p>4.5.6 Starlings</p> <p>4.5.7 Sparrows</p>	<p>The scope of protected species within the assessment (section 3.11) of Volume 3, Chapter 3: Ecology and nature conservation (APP-075) was agreed in consultation with Natural England and the relevant Local Authorities during EWG1 held in March 2023 (see Table 3.5 of Volume 3, Chapter 3: Ecology and nature conservation (APP-075)). The survey scope for such species was agreed in consultation with the EWG during EWG 2 (September 2023) (see response to 1616.31 and was informed through a combination of desk study (to identify existing local records of protected species) and Phase 1 habitat surveys, which appraised the suitability of habitats within the Onshore Order Limits and appropriate buffers (as necessary) to support protected species.</p>

Reference	Relevant Representation Comment	Applicants' response
	<p>4.5.8 Brown Hares</p> <p>4.5.9 Hedgehogs</p>	<p><u>Bats</u></p> <p>Baseline site specific information on bats was collected in extensive bat roost and bat activity surveys as described in Volume 3, Annex 3.10: Bat activity survey technical report (APP-084) and Volume 3, Annex 3.11: Bat roost survey technical report (APP-085). A detailed assessment of potential impacts on bats has been undertaken in in Section 3.11.11 of Volume 3, Chapter 3: Onshore ecology and nature conservation (APP-075). The assessment concluded there would be no more than a minor adverse effects on bats as result of the Transmission Assets, which is not considered significant in EIA terms. Mitigation for potential impacts on bats is described in the Outline Ecological Mitigation Plan (APP-212). The Applicants have made a commitment (CoT76 of Volume 1, Annex 5.3: Commitments Register of the ES (AS-030)) to develop Detailed Ecological Management Plan(s) in line with the Outline Ecological Management Plan (APP-212). This is secured by Requirement 12 within Schedules 2A &amp; 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.</p> <p>The Applicants have committed to the following mitigation:</p> <ul style="list-style-type: none"> <li>• The Applicants have made a commitment (CoT02 of Volume 1, Annex 5.3: Commitments Register of the ES (AS-030)) to trenchless cable installation across a range of features, including to avoid loss of linear habitats used by bats. This secured by Requirement 5 within Schedules 2A &amp; 2B and Requirement 8 within Schedules 2A &amp; 2B of the draft Development Consent Order (AS-004).</li> <li>• The Applicants have made a commitment (CoT03 of Volume 1, Annex 5.3: Commitments Register of the ES (AS-030)) to the avoidance of sensitive sites and habitats. This is secured by DCO Article 3(1) the draft Development Consent Order (AS-004).</li> </ul>

Reference	Relevant Representation Comment	Applicants' response
		<ul style="list-style-type: none"> <li>The Applicants have made a commitment (CoT12 of Volume 1, Annex 5.3: Commitments Register of the ES (AS-030)) to the complete burial of the onshore export cables to avoid the need for overhead power lines. This is secured by DCO Schedule 1, Part of the draft Development Consent Order (AS-004).</li> <li>The Applicants have made a commitment (CoT13 of Volume 1, Annex 5.3: Commitments Register of the ES (AS-030)) to the replacement of hedgerows where removal may be required. This is secured by Requirement 8 within Schedules 2A &amp; 2B and Requirement 12 within Schedules 2A &amp; 2B of the draft Development Consent Order (AS-004).</li> <li>The Applicants have made a commitment (CoT18 of Volume 1, Annex 5.3: Commitments Register of the ES (AS-030)) to core working hours with minimal working at night for specific works when bats are active. This is secured by Requirement 14 within Schedules 2A &amp; 2B of the draft Development Consent Order (AS-004).</li> <li>The Applicants have made a commitment (CoT28 of Volume 1, Annex 5.3: Commitments Register of the ES (AS-030)) to avoiding artificial illumination of bat habitat. This is secured by Requirement 8 within Schedules 2A &amp; 2B and Requirement 12 within Schedules 2A &amp; 2B of the draft Development Consent Order (AS-004).</li> <li>The Applicants have made a commitment (CoT35 of Volume 1, Annex 5.3: Commitments Register of the ES (AS-030)) to general protected species measures. This is secured by Requirement 8 within Schedules 2A &amp; 2B of the draft Development Consent Order (AS-004).</li> </ul> <p><u>Birds</u></p> <p>Detailed site-specific bird surveys have been undertaken to inform the assessments (see Volume 3, Annex 4.1: Breeding birds technical report (APP-091), Volume 3, Annex 4.2: Wintering and migratory birds technical report (APP-092) and (APP-093), Volume 3, Annex 4.3: Onshore and</p>

Reference	Relevant Representation Comment	Applicants' response
		<p>intertidal ornithology – intertidal birds technical report (APP-094), and Volume 3, Annex 4.4: Onshore and intertidal ornithology survey methodologies (APP-095)).</p> <p>Potential impacts on birds including those listed in the response are considered in Volume 3, Chapter 4: Onshore and intertidal ornithology (APP-090). The assessment concluded that potential effects on birds and their supporting habitats would be no more than minor adverse on coastal areas and of no change in all other areas.</p> <p>Full and further mitigation measures, where applicable, would developed in detailed Ecological Mitigation Plan(s). The Applicants have made a commitment (CoT76 of Volume 1, Annex 5.3: Commitments Register of the ES (AS-030)) to develop Detailed Ecological Management Plan(s) in line with the Outline Ecological Management Plan (APP-212). This is secured by Requirement 12 within Schedules 2A &amp; 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.</p> <p>The current proposed mitigation relevant to birds includes (but is not limited to):</p> <ul style="list-style-type: none"> <li>• The Applicants have made a commitment (CoT16 of Volume 1, Annex 5.3: Commitments Register of the ES (AS-030)) to removal of vegetation outside of the bird nesting season, or preceded by nesting bird checks and protection of active nests. This is secured by Requirement 8 within Schedules 2A &amp; 2B and Requirement 12 of Schedules 2A &amp; 2B of the draft Development Consent Order (AS-004).</li> <li>• The Applicants have made a commitment (CoT16 of Volume 1, Annex 5.3: Commitments Register of the ES (AS-030)) to removal</li> </ul>


Reference	Relevant Representation Comment	Applicants' response
		<p>of vegetation outside of the bird nesting season, or preceded by nesting bird checks and protection of active nests. This is secured by Requirement 8 within Schedules 2A &amp; 2B and Requirement 12 of Schedules 2A &amp; 2B of the draft Development Consent Order (AS-004).</p> <ul style="list-style-type: none"> <li>• The Applicants have made a commitment (CoT02 of Volume 1, Annex 5.3: Commitments Register of the ES (AS-030)) to trenchless cable installation across a range of features, including to avoid loss of linear habitats used by bats. This secured by Requirement 5 within Schedules 2A &amp; 2B and Requirement 8 within Schedules 2A &amp; 2B of the draft Development Consent Order (AS-004).</li> <li>• The Applicants have made a commitment (CoT03 of Volume 1, Annex 5.3: Commitments Register of the ES (AS-030)) to the avoidance of sensitive sites and habitats. This is secured by DCO Article 3(1) the draft Development Consent Order (AS-004).</li> <li>• The Applicants have made a commitment (CoT12 of Volume 1, Annex 5.3: Commitments Register of the ES (AS-030)) to the complete burial of the onshore export cables to avoid the need for overhead power lines. This is secured by DCO Schedule 1, Part of the draft Development Consent Order (AS-004).</li> <li>• The Applicants have made a commitment (CoT35 of Volume 1, Annex 5.3: Commitments Register of the ES (AS-030)) to general protected species measures. This is secured by Requirement 8 within Schedules 2A &amp; 2B of the draft Development Consent Order (AS-004).</li> <li>• The Applicants have made a commitment (CoT44 of Volume 1, Annex 5.3: Commitments Register of the ES (AS-030)) to trenchless installation beneath the Lytham St Anne's Site of Special Scientific Interest (SSSI) dune habitat. This is secured by Requirement 8 within Schedules 2A &amp; 2B of the draft Development Consent Order (AS-004).</li> </ul> <p><u>Toads, hare and hedgehogs</u></p>

Reference	Relevant Representation Comment	Applicants' response
		<p>These species along with others were identified in the desk study (Volume 3, Annex 3.1: Onshore ecology desk study technical report (APP-067) as Priority Species for conservation in England under the Natural Environment and Rural Communities Act (2006).</p> <p>Common toad was incidentally recorded during reptile surveys, which when evaluated alongside the desk study evidence, was considered to indicate the presence of common toad populations of local importance (see Table 3.15 in Volume 3, Chapter 3: Ecology and nature conservation (APP-075)). In line with standard practice outlined in Section 3.6.4 of Volume 3, Chapter 3: Ecology and nature conservation (APP-075)), species are considered to be important ecological features (IEF) if they meet at least county level importance (which local importance falls below). Therefore, common toad was not identified as an IEF and was scoped out of the assessment.</p> <p>Brown hare was identified as likely to occur within the Onshore Order Limits given the presence of suitable habitat, and populations were evaluated to be of local importance (paragraph 3.6.1.51 of Volume 3, Chapter 3: Ecology and nature conservation (APP-075)). It was agreed with the EWG in March 2023 that Brown Hare surveys could be scoped 3.5 of out (see Table 3.5 of Volume 3, Chapter 3: Ecology and nature conservation (APP-075)). However, given the temporary nature of the impacts associated with the scheme, habitat loss was acknowledged to be temporary and unlikely to be significant. This species was therefore not identified as an important ecological feature (IEF) and was scoped out of the assessment in accordance with the standard assessment methodology (described in Section 3.6.4 of Volume 3, Chapter 3: Ecology and nature conservation (APP-075)).</p> <p>Hedgehog was identified as likely to occur within the Onshore Order Limits given the presence of suitable habitat, and populations were evaluated to be of local importance (paragraph 3.6.1.51 of Volume 3, Chapter 3: Ecology and nature conservation (APP-075)). This species was therefore not identified as an important ecological feature (IEF) and was scoped out</p>

Reference	Relevant Representation Comment	Applicants' response
		of the assessment in accordance with the standard assessment methodology (described in Section 3.6.4 of Volume 3, Chapter 3: Ecology and nature conservation (APP-075)).
RR-1616 1616.35	4.6 Protected Species Licences from Natural England or Defra have not been obtained to allow activities that would otherwise be illegal, and these or letters of no impediment should be obtained before the Project is consented. Protected species licensing requirements are in addition to the requirements for planning permission and we have not seen evidence of this.	<p>As stated in the Outline Ecology Management Plan (APP-212) pre-construction surveys (and where relevant the development of the detailed design) will be used to assess the need for European Protected Species licences. Pre-construction survey results will be considered when assessing the need for final licences for all relevant protected species including badgers, bats, Schedule 1 species, great crested species, otter, water vole, terrestrial invertebrates and mammals, where they have the potential to be affected by the Project.</p> <p>Where potential impacts are identified for any species for which there is a licensing system in place, the appropriate license will be obtained from Natural England prior to any work which could affect that species. With regard to species where potential licensing requirements have already been identified, measures will include:</p> <ul style="list-style-type: none"> <li>• Badger – The Applicants have made a commitment (CoT104 of Volume 1, Annex 5.3: Commitments Register of the ES (AS-030)) to pre-construction surveys and sett closure licencing where required as specified in the Outline Ecological Management Plan (APP-212). This is secured by Requirement 12 within Schedules 2A &amp; 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.</li> <li>• GCN – The Applicants have made a commitment (CoT92 of Volume 1, Annex 5.3: Commitments Register of the ES (AS-030)) to join the Lancashire District Level Licensing scheme in relation to Great Crested Newts as detailed in the outline ecological management plan (APP-212). This is secured by Requirement 12</li> </ul>




Reference	Relevant Representation Comment	Applicants' response
		<p>within Schedules 2A &amp; 2B of the draft Development Consent Order (AS-004).</p> <ul style="list-style-type: none"> <li>Bats – The Applicants have made a commitment (CoT104 of Volume 1, Annex 5.3: Commitments Register of the ES (AS-030)) pre-construction surveys and obtaining the necessary EPS licences specified in the Outline Ecological Management Plan (APP-212) . This is secured by Requirement 12 within Schedules 2A &amp; 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.</li> </ul> <p>The Applicants note that the need for EPS licences and the type of licences required will be determined by the pre-construction surveys. The Applicants also confirm that the stage of construction will not commence until after the licence has been granted, where impacts are identified (as secured in Requirement 13 of Schedules 2A &amp; 2B of the draft DCO (AS-004)).</p>
RR-1616 1616.36	<p><b>Burial Grounds at Quakers Wood</b></p> <p>5.1 The location of the Morecambe substation (and associated mitigation and access rights), as shown on the Work Plans as works 20b, 22b, 23b, and 24b, appear to overlap with Quakers Wood. Following archaeological research conducted by Oxford University, it has come to our attention that Quakers Wood as depicted in Figure 4 (and marked as 49 and 52) was utilised as burial grounds by Quaker communities, and generally as burial grounds by surrounding communities (see markings 76 and 126).</p>	<p>The Applicants refer to information regarding the potential Quaker burial grounds in the vicinity of Quakers Wood provided in paragraphs 1.5.8.9 to 1.5.8.12 of ES Volume 3, Annex 5.1: Historic environment desk-based assessment (APP-097). The locations of these potential burial grounds are indicated on Figure G(10) in Appendix G of ES Volume 3, Annex 5.1: Historic environment desk-based assessment (APP-097). This figure shows the relevant area as depicted on the 1838 Freckleton Tithe Map, and the potential burial grounds are represented by the plots numbered as 49, 76 and 126 on this map.</p> <p>The onshore export cable corridor in this area has been aligned such that it passes to the north of the potential Quaker burial grounds within plots 76 and 126 as indicated on the 1838 Freckleton Tithe Map. Archaeological geophysical survey has been undertaken within the onshore export cable</p>

Reference	Relevant Representation Comment	Applicants' response
	<p><b>Figure 4</b></p> 	<p>corridor in the land to the north of these potential Quaker burial grounds. The results of this geophysical survey are presented within Figures 28 and 29 in ES Volume 3, Annex 5.2: Onshore archaeological geophysical survey report – Part 1 of 2 (APP-098). The relevant area on these figures is Area 90. The geophysical survey did not identify any anomalies indicative of the presence of graves. A further programme of archaeological investigation will take place here ahead of the commencement of construction. This will be part of the proposed programme of archaeological work set out in the Outline Onshore and Intertidal Written Scheme of Investigation (APP-214). If any burials or other archaeological features are identified here, a programme of further archaeological work will be agreed and implemented in accordance with the procedures set out in the Outline Onshore and Intertidal Written Scheme of Investigation (APP-214).</p> <p>The land within the onshore export cable corridor and also within the potential Quaker burial ground within plot 49 as indicated on the 1838 Freckleton Tithe Map has also been subject to archaeological geophysical survey. The results of this geophysical survey are presented within Figures 28 and 29 in ES Volume 3, Annex 5.2: Onshore archaeological geophysical survey report – Part 1 of 2 (APP-098). The relevant area on these figures is Area 89. The geophysical survey did not identify any anomalies indicative of the presence of graves. However, the onshore export cables will be installed within this area through the use of trenchless technology therefore the potential Quaker burial ground within plot 49 as indicated on the 1838 Freckleton Tithe Map will not be disturbed. This is indicated on Sheet 22 in ES Volume 1, Annex 3.2: Onshore Crossing Schedule Part 2 of 2 (APP-027) where plot 49 as indicated on the 1838 Freckleton Tithe Map is the area shown as that part of the Trenchless Crossing Zone at the western edge of the sheet and to the north of Lower Lane.</p> <p>Potential impacts on the potential Quaker burial grounds in the vicinity of Quakers Wood have therefore been avoided either through the design of the cable route alignment (plots 76 and 126 as indicated on the 1838</p>

Reference	Relevant Representation Comment	Applicants' response
		<p>Freckleton Tithe Map) or through the use of trenchless technology for cable construction (plot 49 and 126 as indicated on the 1838 Freckleton Tithe Map). Archaeological geophysical survey has been undertaken within the onshore export cable corridor in this area, with further archaeological investigations also planned.</p> <p>Should unexpected human remains be encountered, Article 19 of Part 4 of the Draft Development Consent Order (AS-004) sets out a procedure for dealing with the removal of human remains (paragraph 19). For human remains considered to have been interred more than 100 years ago, the procedure for dealing with these is set out in paragraphs 1.5.3.10 to 1.5.3.12 of the Outline Onshore and Intertidal Written Scheme of Investigation (APP-214) secured through Requirement 11 of the draft Development Consent Order (AS-004).</p>
RR-1616 1616.37	5.2 It is estimated that between 50-60 burials occurred without headstones. Furthermore, it is anticipated that other surrounding fields have the potential to hold significant archaeological features and/or artefacts, which must be considered before any on-site works take place. On this basis, we object to any invasive works being carried out on these grounds subject to deploying an archaeological survey. Any issues brought to light therein should be adequately and sensitively addressed. Furthermore, there is no provision in the DCO to deal with human remains	Please refer to the Applicants' response to 1616.36.
RR-1616 1616.37	<p><b>Landscape and Visual Impact</b></p> <p>6.1 The visual impact of the substations and cable corridors running through the countryside is very significant, and any screening will itself have a visual impact. For example, paragraph 10.12.5 onwards of Chapter 10: Landscape and Visual Resources of the Environmental Statement (ES) shows several major and moderate adverse visual impacts from the substations.</p>	<p>The Applicants acknowledge that the Proposed Development would potentially give rise to significant landscape and visual effects in Environmental Impact Assessment ('EIA') terms, as reported in <i>Volume 3, Chapter 10: Landscape and visual resources</i> (APP-123), where relevant. As summarised at the end of APP-123, the Transmission Assets would result primarily in temporary and short-term significant effects on landscape character and visual amenity during construction, operation, and decommissioning of the Transmission Assets, as follows:</p>

Reference	Relevant Representation Comment	Applicants' response
		<ul style="list-style-type: none"> <li>• Temporary construction effects on LCA 19a: Coastal Dune due to the landfall and cable installation.</li> <li>• Temporary construction and short-term operational effects on LCA 15d: Coastal Plain due to the substations' construction, before mitigation planning has established and reduces effects over time.</li> <li>• Temporary construction and short-term operational effects on users of the substation's nearest public bridleway (ref: BW0505016, west and south of the Morgan onshore substation site) and public footpath (ref: FP050503, south of Morecambe onshore substation site).</li> <li>• Temporary and reversible construction effects on beachgoers, Blackpool Recreation Ground users, National Cycle Route 62, and residential properties at Bridge Farm, Bridge Hall Farm, Moss Side Farm, The Old Dairy, Hillock Cross Farm, Savick Brook Farm and Marsh Farm.</li> </ul> <p>The only significant longer term operational visual effects would be sequential effects on users of the nearest public bridleway (ref: BW0505016) and public footpath (ref: FP050503), which are closest to the two onshore substation sites and are connected. Once the landscape proposals – as set out in the Outline Landscape Management Plan (APP-208) and Outline Design Principles document (APP-209) – have become fully established, effects would be reduced.</p> <p>The Applicants note that for landscape and visual impact assessments (LVIAs), 'significance' refers to the 'importance' of an effect, with a 'Major' rating indicating a significant impact that is "...likely to influence the final decision..."; whereas a 'Negligible' rating indicates an effect "...of lesser concern..." (GLVIA3, para 3.35). Determining significance involves assessing both the magnitude of the effects and the sensitivity of the receptor, leading to a professional judgment regarding the effect's importance. As reported in Section 1.2.2 of APP-127, best practice</p>

Reference	Relevant Representation Comment	Applicants' response
		<p>guidance states that there are no strict rules for defining significance but LVIAs must clearly differentiate between significant and non-significant effects (GLVIA3, para 3.32). In APP-127, Section 1.6, this distinction is made by documenting that effects rated as 'Major' are considered significant and an accumulation of individual moderate effects, such as those experienced by the same visual receptor during a journey, might also be deemed significant under certain circumstances.</p> <p>Furthermore, while such significant effects on landscape and visual resources could arise from the Transmission Assets, it is important to acknowledge that the route planning and site selection process and embedded / secondary mitigation measures will be adopted as part of the Proposed Development, as set out in <i>Section 10.9 Measures adopted as part of the Transmission Assets (Commitments)</i> of APP-123. Similarly, while the effects during construction and early operation may be significant, mitigation measures – such as the burial of cables (CoT12 of Volume 1, Annex 5.4: Commitments Register (AS-030) secured by Schedule 1, Part 1 of the draft DCO (AS-004)); reinstatement of landscape features (CoT13 of Volume 1, Annex 5.4: Commitments Register (AS-030) secured by Requirement 12 of Schedules 2A and 2B of the draft DCO (AS-004)) following construction; and the implementation of a landscape mitigation proposals at the substation sites (CoT15 of Volume 1, Annex 5.4: Commitments Register (AS-030) secured by Requirement 6 of Schedules 2A and 2B of the draft DCO (AS-004)) – have been incorporated as part of the iterative design process to minimise potential effects on landscape and visual resources and ensure a well-integrated final development.</p> <p>The Applicants also confirm that the designs of each onshore substation will be finalised post-consent and at detailed design stage. The Outline Design Principles (APP-209) sets out the considerations that will inform the detailed design of the permanent works at each of the onshore substations, including their height, layout and footprint. The detailed design of each of the onshore substations will be developed in accordance with the Outline</p>

Reference	Relevant Representation Comment	Applicants' response
		Design Principles, as secured by Requirement 4(2) of Schedule 2A and Schedule 2B of the draft DCO (AS-004). These details will be submitted to and approved by the relevant planning authority prior to start of construction for each of the onshore substations.
RR-1616 1616.38	<p>6.2 Figure 5 shows a view of the substations from a public footpath. However, no renderings of the substations show the impact on the settings of the heritage assets.</p> <p>Figure 5</p> 	<p>A number of visualisations have been prepared which show how the onshore substations would appear during the operation of the Transmission Assets. The locations of the viewpoints for these visualisations are indicated on Figure 10.2 in ES Volume 3, Figures – Part 5 of 7 (APP-135). These visualisations were used within the assessment of the impacts which have the potential to give rise to likely significant effects in relation to designated heritage assets as a result of the change within their settings, which is presented in ES Volume 3, Annex 5.5: Settings assessment (APP-102). This assessment was based on the Maximum Design Scenario for the onshore substations. No significant effects were identified in respect of any designated heritage asset.</p>
RR-1616 1616.39	<p>6.3 The cluster comprising of Dagger Cottage (1164155), Dixons Farmhouse (1072035) and The White Barn (which is curtilage listed) is significantly impacted from the views from Grange Lane, Thames Street, Newton with Scales. Figure 6 provides a layman's view from the corner of Grange Lane and Thames Street of how the southern substation (represented by the blue box) will have a significant impact on the setting of these heritage assets.</p>	<p>An assessment of impacts which have the potential to give rise to likely significant effects in relation to the likely impact on the significance of designated heritage assets, including listed buildings, as a result of the change within their settings is presented in ES Volume 3, Annex 5.5: Settings assessment (APP-102). This assessment was undertaken in accordance with relevant guidance, specifically the guidance in 'The Setting of Heritage Assets' (Historic England, 2017). It follows the staged approach set out in that guidance document, in which heritage assets that could be affected by a proposed development are initially identified following by a review of the setting of the heritage asset and the contribution that the setting makes to the significance of the heritage asset.</p>



Reference	Relevant Representation Comment	Applicants' response
	<p>Figure 6</p> 	<p>The Grade II listed buildings at Newton with Scales are included within the assessment presented in ES Volume 3, Annex 5.5: Settings assessment (APP-102). The location of these Grade II listed buildings in relation to the Order Limits is indicated on Figures 1.3 - 1.5 of that document (APP-102). The review of the settings of these Grade II listed buildings is set out in Table 1.2 of ES Volume 3, Annex 5.5: Settings assessment (APP-102). For Dixon's Farmhouse, the review concludes 'The views of farmland to the south make a minor contribution to the heritage significance of the listed building, but the majority of the setting comprises residential development that makes a much more limited contribution to its heritage significance'. For Dagger Cottage, the review concludes 'The setting of the listed building makes very little contribution to its heritage significance, most of which derives from the architecture of the structure'.</p> <p>The assessment of the effect on the Grade II listed Dixon's Farmhouse as a result of the change within its setting during construction is presented in paragraphs 1.9.2.6 – 1.9.2.8 of ES Volume 3, Annex 5.5: Settings assessment (APP-102). This identifies that there would not be any view of the construction of the onshore substations from within or adjacent to the listed building. There may be views of the 400 kV grid connection cable corridor from the upper floor of the listed building, but this corridor is approximately 550 m to the south of the building. The magnitude of impact was assessed as negligible adverse, resulting in a medium-term, reversible, negligible adverse effect, which is not significant in Environmental Impact Assessment (EIA) terms.</p> <p>It is possible that the building known as The White Barn is curtilage listed by virtue of its physical attachment to, and functional relationship with, the Grade II listed Dixon's Farmhouse. However, one key aspect of curtilage listing is that the ancillary building (The White Barn) must have been in the same ownership as the principal building (Dixon's Farmhouse) at the time that the initial listing was made – in this case the key date is 1986. If the</p>



Reference	Relevant Representation Comment	Applicants' response
		<p>two buildings were in separate ownership at the time of listing, then The White Barn cannot be regarded as a curtilage listed building. Guidance on this matter is set out in the document Historic England Advice Note 10: Listed Buildings and Curtilage (Historic England, 2018).</p> <p>The Applicants have not undertaken any research on the ownership of these buildings at the time of listing, therefore is unable to comment on the curtilage listed status of The White Barn. However, curtilage structures are not listed in their own right but for their contribution to the special interest of the principal building. The construction, operation and maintenance, and decommissioning of the Transmission Assets would not result in any change within the setting of The White Barn to the extent that the impacts and effects on the significance of the Grade II listed Dixon's Farmhouse would be any greater than as set out in paragraphs 1.9.2.6 - 1.9.2.8 of ES Volume 3, Annex 5.5 Settings Assessment (APP-102).</p> <p>The assessment of the effect on the Grade II listed Dagger Cottage as a result of the change within its setting during construction is presented in paragraphs 1.9.2.9 – 1.9.2.11 of ES Volume 3, Annex 5.5: Settings assessment (APP-102). This identifies that there would not be any view of the construction of the onshore substations from within or adjacent to the listed building. There would not be any views of the 400 kV grid connection cable corridor due to the low height of the listed building, although there may be some impacts from construction noise and possibly dust. The 400 kV grid connection cable corridor is approximately 550 m to the south of the building. The magnitude of impact was assessed as negligible adverse, resulting in a medium-term, reversible, negligible adverse effect, which is not significant in EIA terms.</p> <p>There would be no impacts on these listed buildings during the operation or decommissioning of the Transmission Assets.</p>

Reference	Relevant Representation Comment	Applicants' response
		<p>The image reproduced as Figure 5 of the Relevant Representation is the visualisation from Viewpoint 6, which is presented as Figure 10.5.32 in ES Volume 3, Figures – Part 6 of 7 (APP-136). Viewpoint 6 is located to the south-east of the Morecambe onshore substation. The visualisation shows the Morecambe onshore substation in the centre-left part of the image, with the Morgan onshore substation further away and towards the right-hand side of the image. The settlement of Newton with Scales is visible here to the right of the Morgan onshore substation as a small cluster of buildings mostly rendered white, and is approximately 950 m from the viewpoint.</p> <p>Figure 10.5.32 in ES Volume 3, Figures – Part 6 of 7 (APP-136) is a Year 1 winter view showing how the onshore substations would appear immediately after construction. In addition to the maximum parameters of the substation buildings, this visualisation also indicates the 30m high lightning conductor zone. Seen at a distance of almost 1 km, the presence of the onshore substations (including any lightning conductors) in this view would not affect the ability to appreciate and understand the heritage significance of any listed buildings within the settlement of Newton with Scales.</p> <p>Figure 10.5.34 in ES Volume 3, Figures – Part 6 of 7 (APP-136) is a Year 15 summer view from the same location (Viewpoint 6). It shows the proposed landscape mitigation planting around the onshore substations after 15 years. In this image, the mitigation planting around the Morecambe onshore substation has grown to the extent that the substation buildings at the Morgan onshore substation are fully screened, although it is possible that some lightning conductors would remain visible. The presence of the lightning conductors in this view would not affect the ability to appreciate and understand the heritage significance of any listed buildings within the settlement of Newton with Scales.</p>

Reference	Relevant Representation Comment	Applicants' response
		<p>The image reproduced as Figure 6 of the Relevant Representation is not a reproduction of any of the visualisations prepared by the Applicant. It is described in the Relevant Representation as 'a layman's view from the corner of Grange Lane and Thames Street' and purports to show how the Morecambe onshore substation would appear in this view. No information is provided as to how this image was created in terms of equipment, technical specifications, adherence to guidance or best practice. Therefore it is not possible to appraise the accuracy of the image in which the Morecambe onshore substation is represented as a 'blue box'. It is not clear if the 'blue box' represents the onshore substation buildings and the 30 m high lightning conductor zone, or just the buildings. The location from which the photograph used in Figure 6 of the Relevant Representation is close to the Grade II listed Dixon's Farmhouse, but this view is not one that is available from or adjacent to the listed building.</p> <p>Figure 10.5.26 in ES Volume 3, Figures – Part 6 of 7 (APP-136) is the Year 1 winter visualisation from Viewpoint 5, which is located approximately 100 m further south along Thames Street than the location from which the photograph used in Figure 6 of the Relevant Representation was taken. The visualisation presented as Figure 10.5.26 in ES Volume 3, Figures – Part 6 of 7 (APP-136) shows that the upper parts of the buildings at the Morecambe onshore substation would be visible as well as the 30 m high lightning conductor zone. The substation buildings would be approximately 875-900 m from the viewer. The presence of the Morecambe onshore substation (including any lightning conductors) in this view would not affect the ability to appreciate and understand the heritage significance of any listed buildings within the settlement of Newton with Scales.</p>
RR-1616 1616.40	6.4 Both substations create a visual intrusion on the rural landscape. This has a significant impact as Fylde and as nearby areas like Lytham St Annes rely heavily on tourism, industrial infrastructure would undoubtedly reduce the area's rural charm. The rural charm of these routes and the establishment of Public Right of Way (PRoW),	The Applicants acknowledge that the Proposed Development may result in visual impacts on the local landscape of the Project.

Reference	Relevant Representation Comment	Applicants' response
	<p>country lanes and tracks to enjoy them are the primary reasons that attract tourists, walkers and riders to make extensive use of these routes as recreational spaces. Construction activity will make these roads significantly more dangerous. Moreover, some PRoWs will be totally closed-off due to construction works. Many of the lanes lack footpaths, and construction traffic will make walking these roads dangerous. All these aspects will have a negative impact on residents' physical and mental wellbeing</p>	<p>In response to comments regarding the Public Right of Way (PRoW) network, country lanes, and tracks, the Applicants direct the Parish Council to F3.6 Volume 3, Chapter 6: Land Use and Recreation (APP-104), along with its supporting document, F3.6.3 Volume 3, Annex 6.3: Published Recreational Resources Plan Technical Report (APP-107). This ES Chapter considers, among other aspects, the likely impacts and effects of the onshore elements on the recreational resources during the construction, operation and maintenance, and decommissioning phases. Section 6.11.4 addresses specifically, the temporary impact on the use of recreational resources (APP-104).</p> <p>Additionally, the Applicants refer the Parish Council to F3.10 Volume 3, Chapter 10: Landscape and Visual Resources ((APP-123), which considers the likely impacts and effects of the Transmission Assets on landscape and visual resource. Potential impacts on the landscape character in which the substations are located – LCA 15d: Coastal Plain – is presented in paragraphs 10.12.3.12 to 10.12.3.28 of APP-123; concluding that significant temporary construction and short-term operational effects would occur on this LCA due to the substations' construction. Over time, landscape proposals would help to integrate the Proposed Development into the agricultural landscape and connect to the existing green infrastructure of hedgerows, trees, grassland, stream and field ponds. Sections 10.12.6 to 10.12.7 (APP-123) present the Applicants' assessment of the likely visual impacts that people using recreational resources, including PRoWs, would experience within the LVIA's study area as a result of the various of elements of the Transmission Assets. It has been identified in that the Proposed Development would result primarily in temporary construction and short-term operational effects on users of the substations nearest public bridleway (ref: BW0505016, west and south of the Morgan onshore substation site) and public footpath (ref: FP050503, south of Morecambe onshore substation site). The only significant longer term operational visual effects would be sequential effects on users of the nearest public bridleway (ref: BW0505016) and public footpath (ref: FP050503), which are closest to the two substation sites and connected.</p>

Reference	Relevant Representation Comment	Applicants' response
		<p>Once the landscape proposals – as set out in the Outline Landscape Management Plan (APP-208) and Outline Design Principles document (APP-209) – have become fully established, effects would reduce to a degree.</p> <p>The Applicants will manage and maintain access to the existing Public Rights of Way (PRoW) network during construction (CoT91 of Volume 1, Annex 5.3: Commitments Register of the ES). No PRoW will be permanently stopped up as a result of the construction, operation and maintenance or decommissioning of the Transmission Assets.</p> <p>To manage the potential impacts of construction, the Applicants will apply the measures described in the Outline PRoW Plan (AS-048). For the majority of the PRoW intersected by the Onshore Order Limits, it is proposed that these will remain open with appropriate signage (i.e. managed crossings) to warn of the presence of construction vehicles, and to warn of the presence of walkers, cyclists and horse riders. These managed crossings of PRoW will be fenced off with gated crossing points and temporary site fencing to prevent the public from accessing the PRoW, when access would need to be managed. Where there is a specific requirement to maintain the access, a suitable route will be clearly marked out to aid safe passage. Where such crossings are installed, a gap will be left in the topsoil bunds after the topsoil has been stripped within the onshore export cable corridors.</p> <p>The measures to be implemented as part of the PRoW Management Strategy seek to minimise impacts on public footpaths, bridleways and other promoted routes (e.g. National Cycle Routes (NCRs), Long Distance Footpaths) during construction of the Transmission Assets. The detailed Public Right of Way Management Plan(s), which will be developed in accordance with the outline Public Rights of Way Management Plan (AS-048), and which forms part of the detailed Code of Construction</p>

Reference	Relevant Representation Comment	Applicants' response
		<p>Practice(s). The detailed CoCP(s) are secured by Requirement 8 of Schedules 2A and 2B of the draft DCO (AS-004). Detailed Public Right of Way Plan(s) will be implemented as approved by the relevant local planning authority.</p> <p>The Outline Public Rights of Way (PRoW) Management Plan (APP-198) confirms arrangements in relation to temporary diversions (section 1.5.6) and surface reinstatement (section 1.5.8). This will be brought forward in detailed PRoW Management Plan(s) secured by Requirement 8 of Schedules 2A &amp; 2B of the draft DCO (AS-004).</p> <p>Volume 1, Annex 5.1: Human health (APP-035) considers transport modes, access and connections (section 1.12.2), open space, leisure and play (section 1.12.3) and air quality (section 1.12.5) human health effects from the Transmission Assets. It concludes the Transmission Assets should not result in any significant adverse impact on public health, including for vulnerable groups. That assessment includes Lytham St Annes as part of the local population of Fylde. This conclusion applies to impacts relating to:</p> <ul style="list-style-type: none"> <li>• temporary disruption to active travel;</li> <li>• dust effects from construction and decommissioning activities and construction compounds, as well as vehicle emissions from construction traffic; and</li> <li>• temporary disruption in access to green (land) and blue (water) public open spaces.</li> </ul> <p>The UK Health Security Agency and the Department of Health's Office for Health Improvement and Disparities have reviewed the assessment and state that they agree with the methods and that they are satisfied that the proposed development should not result in any significant adverse impact on public health (AS-061).</p>

Reference	Relevant Representation Comment	Applicants' response
		<p>Chapter 7: Traffic and Transport (APP-108) contains an assessment of the impacts of the Transmission Assets upon traffic and transport receptors. To inform the assessment, the Applicants have undertaken a comprehensive data collection exercise including capturing baseline traffic flows, speeds, identification of sensitive receptors and collisions for all highway links within Blackpool Council, Lancashire Couty 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 potential impacts of the Project in relation to 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>In regard to construction noise, the Applicants have made a commitment (CoT79 of Volume 1, Annex 5.3: Commitments register (AS-030)) to implement detailed Construction Noise and Vibration Management Plan(s) which will contain measures to mitigate noise throughout the construction phase. This is secured by Requirement 8 within Schedules 2A &amp; 2B. The mitigation measures included in these Plan(s) will be developed during the detailed design and will by informed by those set out in the outline Construction Noise and Vibration Management Plan (APP-196). The detailed Plan(s) form part of the Codes of Construction Practice (CoCP(s)) and the Applicants have made a commitment (CoT35 of Volume 1, Annex 5.3: Commitments Register of the ES (AS-030)) to develop the outline CoCP into detailed CoCP(s). This is secured by Requirement 8 within Schedules 2A &amp; 2B.</p> <p>In regard to the onshore substations, an assessment, in line with BS4142:2014+A1:2019, has been undertaken to predict the potential noise</p>



Reference	Relevant Representation Comment	Applicants' response
		<p>impacts associated with the operation of each of the onshore substations, as presented in section 8.11 of ES Volume 3, Chapter 8: Noise and vibration (APP-117). The assessment has focused on longer term receptors, those which occupy an area for a long period, as opposed to PRow users which are transient in nature and exposed for a much shorter duration. The closest PRow to the onshore substations is 5-5-BW 16, which is in close proximity to Freshfield Farm. To avoid an adverse impact at those Freshfield Farm, and other longer-term receptors, the operational noise limits for the onshore substations are set to be less than 5dB(A) above representative night-time background sound levels. The background sound level is that which is exceeded for 90% of the time, representing quieter periods when other sound sources are absent e.g. car movements on nearby roads. As stated within BS4142, the lower the difference between the sound source and background sound level, the less likely an adverse impact will occur. At around 5 dB difference between the sound source and background sound level, an adverse impact may occur, depending on context. This level of impact is based on research and accumulated experience of several acousticians. When considering the noise level of the onshore substations compared to the residual sound level, the onshore substations would have no influence, thus having no impact on the short-term duration of users of the PRow. The residual sound level is that which includes all typical noise sources in the area e.g., car movements, farming activity. The daytime residual level measured at Freshfield Farm, and representative of PRow 5-5-BW 16, is presented in Table 1.8 of ES Volume 3 Annex 8.1: Baseline Sound (APP-118) and replicated below:</p> <p><u>Location LT14: 46-59 LAeq,16h dB</u></p> <p>When comparing the sound level from the onshore substations to the residual levels, the onshore substations would have no influence. This is based on the operational sound being 10 dB less than the background sound. In acoustic terms, a sound that is 10 dB less than the residual sound has no impact on the higher level.</p>

Reference	Relevant Representation Comment	Applicants' response
		Overall, the Applicants consider that they have undertaken a robust assessment of potential impacts on residents' physical and mental wellbeing and have identified appropriate mitigation to reduce those impacts.
RR-1616 1616.41	<b>Traffic Disruptions</b> 7.1 Creation of the substations and cable corridors will require significant construction work, which will disrupt local roads through the creation of noise, dust, and traffic congestion of local communities. These impacts congestion impacts will be detrimental to tourism and local businesses.	<p>Chapter 7: Traffic and Transport (APP-108) contains an assessment of the impacts of the Transmission Assets upon traffic and transport receptors. To inform the assessment, the Applicants have undertaken a comprehensive data collection exercise including capturing baseline traffic flows, speeds, identification of sensitive receptors and collisions for all highway links within Blackpool Council, Lancashire County Council and National Highways administration areas. In total, data for 91 highway links have been collected covering over 155km of highway network.</p> <p>The assessment has considered the potential impacts of the Project in relation to 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. In addition, the data contained within Volume 3, Chapter 7: Traffic and Transport (APP-108) has informed the assessment of traffic related noise, air quality and tourism effects which are considered within Chapter 8: Noise and Vibration (APP-117) and Chapter 9: Air Quality (APP-121). In regard to construction traffic noise impacts, the assessment has predicted a negligible to low impact on all roads used by construction traffic. The highest increase in noise level due to traffic is 1 dB. Due the logarithmic nature of decibels, a 1 dB increase would be unnoticeable to receptors. As best practice however, the Applicants have made a commitment (CoT79 of Volume 1, Annex 5.3: Commitments register (AS-030)) to implement detailed Construction Noise and Vibration Management Plan(s) which will contain measures to mitigate noise throughout the construction phase. This is secured by Requirement 8 within Schedules 2A &amp; 2B. The mitigation measures included in these Plan(s) will be developed during the detailed design and will be informed by</p>

Reference	Relevant Representation Comment	Applicants' response
		<p>those set out in the outline Construction Noise and Vibration Management Plan (APP-196). The detailed Plan(s) form part of the Codes of Construction Practice (CoCP(s)) and the Applicants have made a commitment (CoT35 of Volume 1, Annex 5.3: Commitments Register of the ES (AS-030)) to develop the outline CoCP into detailed CoCP(s). This is secured by Requirement 8 within Schedules 2A &amp; 2B.</p> <p>In regard to air quality impacts, traffic generated during the construction phase will increase concentrations by less than 0.5 % of the air quality objective and is predicted to have a negligible impact on air quality.</p> <p>Details of measures to manage, monitor and control dust and noise are included within the Outline Code of Construction Practice (OCoCP) (APP-193), incorporating the Outline Construction Noise and Vibration Management Plan (APP-196) and Outline Dust Management Plan (APP-195). The requirement to produce a detailed CoCP(s) in accordance with the OCoCP is secured by Requirement 8 of Schedules 2A and 2B of the draft DCO (APP-005).</p> <p>With regard to congestion impacts on tourism and local businesses, temporary traffic impacts associated with construction activity are not considered to have significant interdependencies with visitor economy performance. Baseline traffic and transport conditions are expected to return to pre-project conditions following conclusion of the construction phase.</p> <p>The Applicants note that significant commitments have been made to the use of trenchless installation techniques, such as Horizontal Directional Drilling to minimise disruption by ensuring that all roads and railways (with the exception of Leach Lane) crossed by the Transmission Assets remain open. With reference to Volume 1, Annex 5.3: Commitments Register (AS-</p>

Reference	Relevant Representation Comment	Applicants' response
		<p>030), commitment (CoT02) the use of trenchless techniques is secured via Requirement 8 (Code of Construction Practice) of Schedules 2A and 2B of the draft Development Consent Order (DCO) APP-005).</p> <p>With regard to Leach Lane (located within Lancashire County Councils administration area) the Applicants have proposed that the road remains open with works completed on a 'half / half basis' with traffic controlled through the use of temporary management, such as traffic signals. The approach to managing highway crossings is outlined in section 1.8 of the Outline Construction Traffic Management Plan (OCTMP) (APP-211). The requirement to produce detailed CTMP(s) in accordance with the OCTMP and agree this with the relevant highway authority is secured by Requirement 9 of Schedules 2A and 2B of the draft DCO (APP-005).</p>
RR-1616 1616.42	<p>7.2 Table 7.21 of Chapter 7: Traffic and Transport of the ES shows substantial percentage increases in heavy good vehicles on roads and motorways. For example:</p> <p>7.2.1 1,400% increase on Leach Lane North / Appealing Lane / The Hamlet</p> <p>7.2.2 1,740% increase on Blackpool Road North from Kilnhouse Lane junction and access A5</p> <p>7.2.3 345% increase on Ballam Road between Peel Road and accesses A16 / A19</p> <p>7.2.4 656% increase on Ballam Road between Peel Road and Fox Lane Ends</p>	<p>Volume 3, Chapter 7: Traffic and Transport of the Environmental Statement (APP-108) contains an assessment of the Transmission Assets effects upon traffic and transport receptors in compliance with EN-1 and other relevant transport policy and guidance. The assessment has considered the effects of the Transmission Assets upon the impacts of driver delay, severance, non-motorised user delay, fear and intimidation, road safety and abnormal loads and concludes that residual effects would not be significant in Environmental Impact Assessment (EIA) terms.</p> <p>It is noteworthy that the percentage change figures quoted by IPs are selective and relate to the highest percentage change in HGV traffic per link (not total traffic). In contrast it can be noted from Table 7.21 of Volume 3, Chapter 7: Traffic and Transport of the Environmental Statement (APP-108) that changes in total traffic flows on these selected links range between 3 and 16%.</p>

Reference	Relevant Representation Comment	Applicants' response
		<p>The relevant guidance published for the Environmental Assessment of Traffic and Movements (published by the Institute of Environmental Management and Assessment, 2023) notes that: <i>"Thresholds are expressed as a starting point for any assessment and typically have been derived from studies of major changes in traffic flows and therefore should be used cautiously in any assessment."</i></p> <p>The quoted high percentage changes in HGV traffic are a function of the low background HGV flows along these selected links. The Applicants would note that these figures should be viewed with caution as a percentage increase becomes an increasingly 'crude' indicator of magnitude of impact when baseline flows are very low.</p>
RR-1616 1616.43	7.3 The Applicant does not consider mitigation for the impact on users of highways or Public Rights of Way, where the introduction of abnormally shaped construction vehicles will block up the width of certain roads. For example, Lower Lane Freckleton, Bryning Lane and multiple Public Rights of Way	<p>All AIL movements will be accordance with the Road Vehicles (Authorised Weight) Regulations (1998), ensuring that advanced notification is given to the highway authorities and police ensuring that routes, safety mitigation, timings and escort requirements are agreed prior to movement to ensure minimum disruption to road users.</p> <p>In addition to the legislative requirements, section 1.4 of the Outline Construction Traffic Management Plan (OCTMP) (APP-211) includes a commitment to ensuring that the timing of abnormal indivisible loads (AIL) deliveries is discussed and agreed with the relevant highways authority to minimise delays for other road users and to minimise risk to highway users (including users of Public Rights of Way where they interact with the highway). Where an abnormal load will occupy all of the carriageway or stray into the opposing lane, there will be a requirement for a police escort to manage and control the interaction with any oncoming traffic or non-motorised road users (pedestrians, cyclists, equestrians).</p>

Reference	Relevant Representation Comment	Applicants' response
		The requirement to produce detailed CTMP(s) in accordance with the OCTMP and agree this with the relevant highway authority is secured by Requirement 9 of Schedules 2A and 2B the <b>draft DCO</b> (APP-005).
RR-1616 1616.44	Noise and Vibration 8.1 The substations and cable corridors are very close to residential properties and schools including Strike Lane Primary School, Newton Bluecoat Church of England Primary School and Carr Hill High School.	<p>The Applicants note the concerns regarding the proximity of residential properties and schools to the onshore substations and cable corridors.</p> <p>The Applicants have undertaken an assessment of the potential impacts and effects likely to result from the following:</p> <ul style="list-style-type: none"> <li>• construction noise and vibration;</li> <li>• construction traffic; and</li> <li>• operational noise from the onshore substations.</li> </ul> <p>The outcomes of these assessments are reported in ES Volume 3, Chapter 8: Noise and Vibration (APP-117). The methodologies adopted for these assessments are based upon nationally accepted industry guidance. The Applicant confirms that the assessment approach including the derivation of impact criteria and the determination of effects, has been applied to other consented Nationally Significant Infrastructure Projects.</p> <p>As noted in section 8.4 of APP-117, the assessment focussed on receptors within the following study areas where potential impacts are most likely to occur, informed by best practice guidance:</p> <ul style="list-style-type: none"> <li>• noise sensitive receptors located within 1 km of the landfall and onshore substations;</li> <li>• noise sensitive receptors located within 300 m of the onshore export cable corridor and the 400 kV grid connection cable corridor; and</li> </ul>

Reference	Relevant Representation Comment	Applicants' response
		<ul style="list-style-type: none"> <li>vibration sensitive receptors located within 100 m of onshore and intertidal construction activities.</li> </ul> <p>The assessment focussed on impacts at residential receptors within these study areas and acknowledges that educational receptors were not included. However, the Applicant notes that the schools identified are located either outside of the study areas defined above, or close to the outer limit of onshore substations study area boundary, as indicated by the distances set out below:</p> <p><u>Strike Lane Primary School:</u></p> <ul style="list-style-type: none"> <li>Closest distance to construction activities: approximately 450 m (onshore export cable corridor);</li> <li>Closest distance to onshore substations: approximately 710 m (Morecambe onshore substation)</li> </ul> <p><u>Newton Bluecoat Church of England Primary School:</u></p> <ul style="list-style-type: none"> <li>Closest distance to construction activities: approximately 370 m (site access road to 400kV grid connection cable corridor)</li> <li>Closest distance to onshore substations: approximately 1590m (Morecambe onshore substation)</li> </ul> <p><u>Carr Hill High School:</u></p> <ul style="list-style-type: none"> <li>Closest distance to construction activities: approximately 750m (Morgan onshore substation)</li> <li>Closest distance to onshore substations: approximately 750m (Morgan onshore substation)</li> </ul>



Reference	Relevant Representation Comment	Applicants' response						
		<p>The distances above identify that Strike Lane Primary School and Car Hill High School are located within the study area associated with the assessment of likely impacts resulting from the onshore substations. However, noise impacts on educational facilities such as schools are considered differently to residential receptors. These impacts will be presented in an updated assessment to be submitted at Deadline 1.</p>						
RR-1616 1616.45	<p>8.2 No information has been provided regarding the possible acoustic issues that may surround substation equipment, which may produce a low frequency 50hz background hum (estimated to be about 60dB) which can be significant in the context of the sensitive receptors identified above. What information that is available suggests that a noise level in excess of 35dB above ambient is to be expected. This is intolerable for anyone living close to the development and experience suggests that in some weather conditions the noise footprint would be far wider than predicted.</p>	<p>An assessment to predict the potential noise impacts associated with the operation of each of the onshore substations has been undertaken and presented in ES Volume 3, Chapter 8: Noise and vibration (APP-117). These predictions have been based on downwind weather conditions.</p> <p>The assessment is based on the guidance within BS 4142:2014+A1:2019, which includes a method to assess impacts on receptors resulting from industrial and commercial sound sources. This has included the setting of a representative background sound level based on the most frequently occurring background sound level measured during the baseline sound surveys undertaken in June 2023 and March 2024 (paragraphs 1.2.2.5 to 1.2.2.7 in ES Volume 3, Annex 8.1: Baseline sound survey (APP-120)).</p> <p>Several indicative mitigation measures have been included in the assessment of potential noise impacts likely to result from the operation of the onshore substations. Such measures, which may be incorporated as part of the designs of the onshore substations, are presented in Tables 8.31 of Volume 3, Chapter 8 (APP-117) and are replicated below:</p> <table> <tr> <th>Plant item</th><th>Acoustic Mitigation</th><th>Insertion Loss (dB)</th></tr> <tr> <td>400/220/33 kV Super Grid Transformer incl. Coolers</td><td>Enclosure</td><td>20</td></tr> </table>	Plant item	Acoustic Mitigation	Insertion Loss (dB)	400/220/33 kV Super Grid Transformer incl. Coolers	Enclosure	20
Plant item	Acoustic Mitigation	Insertion Loss (dB)						
400/220/33 kV Super Grid Transformer incl. Coolers	Enclosure	20						

Reference	Relevant Representation Comment	Applicants' response		
		220 kV Shunt Reactor	Enclosure	20
		400 kV Shunt Reactor	Enclosure	20
		Dynamic Reactive Power Compensator (SVC) Phase Reactors	Quieter plant/barrier/enclosure	5
		2x 33 kV Mechanically Switched Reactors (MSR)	Quieter plant/barrier/enclosure	5
		275 kV Filter	Quieter plant/barrier/enclosure	10
		400 kV Filter	Quieter plant/barrier/enclosure	10
		<p>As discussed in paragraph 1.2.3.15 of Volume 3 Annex 8.3: Operational noise (APP-120), the Applicants acknowledge that low frequency sound is likely to be emitted from the Super Grid Transformers and Shunt Reactors plant within the substations. Graph 1-1 in (APP-120) presents typical noise emissions from such plant at different frequencies, with the emissions in the 100 Hz frequency band being the most dominant.</p> <p>However, the data presented in the graph does not represent the human ear's response to sound (A-weighting), which is less sensitive at low frequencies. For instance, at 50Hz, the human ear would hear 30 dB(A) as opposed to the unweighted 60 dB emission level presented in the graph. At 100Hz, the unweighted 80 dB emission levels presented in the graph would be perceived by the human ear as 60 dB(A). This highlights that the 100Hz is likely to be the dominant tone.</p>		

Reference	Relevant Representation Comment	Applicants' response
		<p>To confirm, the proposed operational noise limits are set to be less than 5dB(A) above representative night-time background sound levels at the nearest noise sensitive receptors to the substations, as set out in paragraph 1.3.1.2 of ES Volume 3 Annex 8.3 Operational Noise. The background sound level is that which is exceeded for 90% of the time, representing quieter periods when other sound sources are absent e.g., car movements on nearby roads. The operational sound from the substations is predicted to range from 17 to 37 dB (A), depending on proximity to the substations, as presented in Table 8.34 of APP-117. The predicted sound levels are no more than 5 dB above the background sound levels, and for the majority of receptors, below this level. Therefore, the operation of the substations is complying with the noise limits, resulting in a negligible effect. By limiting the sound level from plant within the onshore substations to be less than 5dB(A) above representative background sound levels, potential adverse impacts at the noise sensitive receptors are likely to be avoided (Table 1.1 of (APP-120)).</p> <p>In addition, the Applicants have made a commitment (CoT80 of Volume 1, Annex 5.3: Commitments Register of the Environmental Statement (AS-030) to produce detailed Operational Noise Management Plan(s) for the onshore substations. This is secured under Requirement 18 of Schedules 2A and 2B of the draft DCO (AS-004). Detailed Operational Noise Management Plan(s) will be prepared and submitted to the relevant local authority for approval. The detailed Plan(s) will identify the noise limits for the operation of the onshore substations and the measures for how these limits would be monitored.</p>
RR-1616 1616.46	<b>Flooding</b> 9.1 Much of Lytham lies below sea level. The Climate Central Coastal screening tool risk map shows much of Lytham and St Annes underwater by 2050. Drilling wide cable corridors under the sand dunes, will weaken the current coastal defences. Undermining the	As noted in section 3.14.3 of Volume 1, Chapter 3: Project description (AS-024), the offshore export cables between the transition joint bay and the Landfall will be installed using trenchless installation techniques. The direct pipe trenchless technique is a fully cased system. The ducting for the cables when using this technique will comprise graded steel and involve no concrete. Concrete would only be required at the transition joint bay and

Reference	Relevant Representation Comment	Applicants' response
	<p>sand dunes and constructing a concrete corridor for cables could potentially create a corridor for water to travel inland, resulting in the flooding of vulnerable residential areas much earlier than anticipated.</p>	<p>joint bays in the form of a concrete reinforced floor. Therefore, there is no potential to a create concrete corridor to channel water inland.</p> <p>An assessment of climate change has been made to the Transmission Assets and is presented within Volume 3, Annex 2.3: Flood risk assessment (parts 1, 2 and 3) (AS-040, AS-042 and AS-044). This includes how increases in peak river flow will affect fluvial flood risk to and from the Transmission Assets, how sea level rise will affect tidal flood risk to and from the Transmission Assets and how an increase in peak rainfall intensities will affect surface water flooding to and from the Transmission Assets. An increase in flood risk as a result of sea level rise (which is demonstrated within the Climate Central Coastal screening tool) is accounted for within fluvial and tidal flood risk sections of the report (section 1.5.5, section 1.6.4 and section 1.7.4 of the Flood Risk Assessment (AS-040, AS-042 and AS-044). As discussed within the Volume 3, Annex 2.3: Flood Risk Assessment (parts 1, 2 and 3) (AS-040, AS-042 and AS-044), flood risk from tidal sources to the Transmission Assets is assessed to be low. Given the nature of tidal flood risk, an assessment of flood risk from the Transmission Assets to tidal flooding is not deemed to be necessary.</p> <p>An assessment of climate change has been made to the Transmission Assets and is presented within Volume 3, Annex 2.3: Flood risk assessment (parts 1, 2 and 3) (AS-040, AS-042 and AS-044). This includes how increases in peak river flow will affect fluvial flood risk to and from the Transmission Assets, how sea level rise will affect tidal flood risk to and from the Transmission Assets and how an increase in peak rainfall intensities will affect surface water flooding to and from the Transmission Assets. An increase in flood risk as a result of sea level rise (which is demonstrated within the Climate Central Coastal screening tool) is accounted for within fluvial and tidal flood risk sections of the report (section 1.5.5, section 1.6.4 and section 1.7.4 of the Flood Risk Assessment (AS-040, AS-042 and AS-044). As discussed within the</p>

Reference	Relevant Representation Comment	Applicants' response
		<p>Volume 3, Annex 2.3: Flood Risk Assessment (parts 1, 2 and 3) (AS-040, AS-042 and AS-044), flood risk from tidal sources to the Transmission Assets is assessed to be low. Given the nature of tidal flood risk, an assessment of flood risk from the Transmission Assets to tidal flooding is not deemed to be necessary.</p> <p>Within Volume 3, Chapter 2: Hydrology and flood risk (APP-070), the sand dunes at Lytham St Anne's have been identified as a flood defence, offering protection from tidal flooding to inland areas by virtue of elevation and also act to reduce wave action.</p> <p>During construction and decommissioning of the onshore elements of the Transmission Assets, there is a potential risk of increased flood risk as a result of damage to the existing flood defences, including the sand dunes at Lytham St Annes. This potential impact is assessed within section 2.11.4 of Volume 3, Chapter 2. Hydrology and flood risk (APP-070). Sand dunes at Lytham St Annes that act as informal flood defences. To support the assessment of this impact, a site-specific Flood Risk Assessment (Volume 3, Annex 2.3 parts 1 and 2) (APP-073) and (APP-074) in accordance with NPS EN-1, the NPPF and associated PPG has been undertaken for the study area.</p> <p>The Applicants have made a commitment (CoT44 of Volume 1, Annex 5.3: Commitments Register of the ES (AS-030)) to an offset distance between the boundary of the toe of the dunes and the trenchless technique exit pit installation area of 100 m as well as outlining that the installation of the offshore export cable corridor at Lytham St Annes SSSI and the St Anne's Old Links Golf Course will be undertaken by trenchless installation technique. This is secured by the works descriptions for Work Nos.6A and 6B together with the Works Plans (AS-014 and AS-015) and also Requirement 8 within Schedules 2A &amp; 2B of the draft Development Consent Order (AS-004). Requirement 8 provides that detailed CoCP(s)</p>

Reference	Relevant Representation Comment	Applicants' response
		will be implemented by the Applicants as approved by relevant local authorities in consultation with stakeholders, as appropriate. Taking into consideration the aforementioned commitment, the installation method of the offshore export cable corridor beneath the Lytham St Anne's Dunes SSSI, the Transmission Assets has a low to very low risk of flooding, and flood risk (including tidal flood risk) will not be increased as a result of development.
RR-1616 1616.47	9.2 The Applicant has only recently requested affected farmers to identify whether or not their fields hold water at any time of the year, indicating that they do not understand the topography of the southern Fylde, which still contains large areas of designated marsh adjacent to the areas being considered. Much of the rest of the Fylde, which is particularly low lying as shown by the EA flood maps, is reclaimed marsh and relies on the effectiveness of the drainage systems created over a long period starting with Lytham Moss in the 17th century. This includes the existing main river tributaries, the associated dykes and ditches and extensive use of buried land 32389236.1 13 tiles/drains to drain the area. Damage will naturally worsen the ability to drain the land and ensure more areas retain water, rather than have it drain.	<p>The Applicants note that southern Fylde encompasses a large area of reclaimed marshland that relies on the effectiveness of drainage systems, including field drainage. During construction, operation and maintenance of the onshore elements of the Transmission Assets, there is a potential for potential impacts on field drainage. This impact is assessed within section 2.11.6. of Volume 3, Chapter 2: Hydrology and flood risk (APP-070). Overall, 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 Environmental Impact Assessment (EIA) terms.</p> <p>The Applicants have made a commitment (CoT39 of Volume 1: Annex 5.3: Commitments Register) to retain ditches and drainage outfalls at the landfall and along the onshore export cable corridor and 400 kV grid connection cable corridor, and any damage will be repaired and reinstated. Following construction, reinstatement measures will be undertaken to ensure land is reinstated to baseline conditions. This is secured by Requirement 8 within Schedules 2A &amp; 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>Section 3.15.5 of Volume 1, Chapter 3: Project description (APP-024) discusses how areas of construction will be reinstated along the onshore export cable corridor and at the onshore substations. The Applicants have</p>

Reference	Relevant Representation Comment	Applicants' response
		made a commitment (CoT08 of Volume 1: Annex 5.3: Commitments Register) to reinstate working areas to pre-existing condition as far as reasonably practical. This is secured by Requirement 8 within Schedules 2A & 2B and Requirement 16 within Schedules 2A & 2B of the draft Development Consent Order (AS-004). In addition, the Applicants have made a commitment (CoT35 of Volume 1: Annex 5.3: Commitments Register) to develop detailed CoCP(s) in line with the Outline CoCP and include details on construction drainage (APP-193). 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.
RR-1616 1616.48	<b>Draft Development Consent Order</b> Comments in respect of the draft Development Consent Order. <b>Project A - Morgan</b> 10.1 Requirement 3 – Stages of authorised project – For clarity, a provision should be added or (3) modified so that it requires the Applicant to implement the scheme as approved by the relevant planning authority.	<p>The Applicants have included this in Schedule 2A of the draft DCO (AS-004). Please refer to Requirement 3(3) which states “(3) <i>The construction of the Project A onshore works and Project A intertidal works must follow the details provided under sub-paragraph (2).</i>”</p> <p>The same applies in relation to Project B. See Requirement 3(3) of Schedule 2B of the draft DCO (AS-004).</p>
RR-1616 1616.49	10.2 Requirement 7 – Implementation and maintenance of landscaping – For clarity, a provision should be added requiring the Applicant to implement the landscaping scheme as approved under Requirement 6.	<p>The Applicants refer to requirement 7 in Schedule 2A of the draft DCO (AS-004), noting a provision aligning with this request has already been provided:</p> <p><i>“7(1) All landscaping works must be carried out in accordance with the landscaping schemes approved under requirement 6 provision of landscaping”.</i></p> <p>The same applies in relation to Project B. See Requirement 7 of Schedule 2B of the draft DCO (AS-004).</p>



Reference	Relevant Representation Comment	Applicants' response
RR-1616 1616.50	10.3 There is no landfall construction method statement concerning works (Work Nos. 3A, 4A, 5A, 6A, 7A, 8A, 9A, 10A, 36A, 38A, 42A, 43A and 47A together with any other authorised development associated with those works and related ancillary works). A provision governing this process ought to be included to the effect that (1) no landfall construction work may commence until a method statement or equivalent has been submitted and approved by the relevant planning authority, and (2) the method statement referred to above is implemented as approved.	<p>The Applicants do not consider it is necessary to include additional drafting in the draft Development Consent Order (DCO) (AS-004) providing for a landfall construction method statement concerning the Work Nos. noted as the details of the construction methods are set out in Volume 1, Chapter 3: Project description (AS-024). Adherence to the scope of works set out in that chapter is secured through the wording in the DCO that requires the project to be in accordance with the environmental statement. In addition, there are already existing provisions within the draft DCO (AS-004) to govern construction processes at landfall. These are as follows:</p> <p>No licensed activities under the Marine Licence 1: Morgan Offshore Wind Project Transmission Assets, which would include Work Nos. 3A and 4A, may commence until a relevant construction method statement has been prepared in accordance with Condition 18(1)(e) of Schedule 14 of the draft DCO (AS-004). Condition 19(3) requires that the licensed activities must then be carried out in accordance with that construction method statement. Similarly, Project A onshore works and Project A intertidal works (which covers Work Nos 5A-54A) cannot commence until for each stage of the works a detailed code of construction practice has been prepared and approved by the relevant planning authority. This is set out in Requirement 8(1) of Schedule 2A, and in accordance with Requirement 8(2), each detailed CoCP and supporting management plan as relevant must be prepared in accordance with the outline plan submitted at application (APP-193 – APP-207). The details secured through the CoCP(s) ensure they key aspects of the Applicants' approach to construction are approved by the relevant local authority in advance. Requirement 8(3) requires those works to be carried out in accordance with the plan approved under Requirement 8(2).</p> <p>The same applies in relation to Project B. See the same provisions above noted in Schedule 2B and Schedule 15 of the draft DCO (AS-004).</p>
RR-1616	10.4 Requirement 8 – Code of construction practice – (3) only concerns Project A onshore works, does this apply to Project A	The Applicants agree that sub-paragraph (3) should also refer to Project A intertidal works. An updated draft DCO will be provided at Deadline 1.

Reference	Relevant Representation Comment	Applicants' response
1616.51	intertidal works? Please justify if not or otherwise amend to include Project A Intertidal works.	The same applies in relation to Project B.
RR-1616 1616.52	10.5 Requirement 9 – Traffic and Transport – (3) only concerns Project A onshore works, does this apply to Project A intertidal works? Please justify if not or otherwise amend to include Project A Intertidal works.	<p>There are no highway or streets which lead directly to the Project A intertidal works and Requirement 9 is therefore only intended to apply to the Project A onshore works.</p> <p>The same applies in relation to Project B. See Requirement 9 of Schedule 2B of the draft DCO (AS-004).</p>
RR-1616 1616.53	10.6 Requirement 11 – Onshore archaeology – similar projects have been prescriptive with the detail that ought to be included in the archaeological written scheme of investigation. Please include further detail on what such schemes will cover.	<p>The Applicants note this comment, however, the requirement provides for the detailed WSI(s) to be submitted in accordance with the outline onshore WSI (APP-214). This outline plan already sets out the details and requirements for the detailed WSI(s) and will form part of the certified documents accompanying any Development Consent Order as made.</p> <p>The same applies in relation to Project B. See Requirement 11 of Schedule 2B of the draft DCO (AS-004).</p>
RR-1616 1616.54	10.7 Requirement 13 – European protected species onshore – (3) only concerns Project A onshore works, does this apply to Project A intertidal works? Please justify if not or otherwise amend to include Project A Intertidal works.	<p>The Applicants confirm that they have not identified a need for EPS licences within the intertidal areas. Therefore Requirement 13(3) of Schedule 2A correctly refers only to Project A onshore works.</p> <p>The same applies in relation to Project B. Please see Requirement 13(3) of Schedule 2B of the draft DCO (AS-004).</p>
RR-1616 1616.55	10.8 Requirement 14 – Construction hours – construction hours on Saturdays are typically 0700 hours to 1300 hours, is there a justification for why the hours are 0700 hours to 1900 hours Monday	The Applicants' proposed construction working hours seek to strike a balance between protecting residential amenity and other sensitive receptors, and ensuring the projects can be delivered in a timely manner

Reference	Relevant Representation Comment	Applicants' response
	to Saturday? For (3) a provision ought to be added to the effect that such approved works must be completed within the agreed time. The outline Code of Construction Practice at paragraph 1.6.2.1 provides that no core working will be undertaken on Sundays or Bank 32389236.1 14 Holidays, except in exceptional circumstances. There is no inclusion or reference to such exceptional circumstances in Requirement 14. For the avoidance of ambiguity please detail what situations may give rise to such exceptions or if not required remove such wording as this carries the risk of establishing conflicting exceptions.	<p>without extending the overall construction durations set out in the Project Description (AS-024).</p> <p>The core working hours are secured by Requirement 14 (Construction hours) of Schedule 2A to the draft DCO (AS-004).</p> <p>The circumstances in which core working will be undertaken outside of core working hours, including on Sundays or Bank Holidays, are those specified in Requirement 14(2) of Schedule 2A to the draft DCO (AS-004). There are no other additional 'exceptional circumstances' anticipated by the projects.</p> <p>The same applies in relation to Project B. Please see Requirement 14 of Schedule 2B to the draft DCO (AS-004).</p> <p>The Applicants do not consider any amendments are required or necessary in respect of Requirement 14 in either Schedule 2A or 2B of the draft DCO (AS-004).</p>
RR-1616 1616.56	10.9 Requirement 15 – Fencing and other means of enclosure - For clarity, a provision should be added requiring the Applicant to complete the fencing and other means of enclosure works as approved by the relevant planning authority.	<p>The Applicants note this comment and an updated draft DCO will be provided at Deadline 1 which reflects this request.</p> <p>The same applies to Project B.</p>
RR-1616 1616.57	10.10 Requirement 16 – Restoration of land used temporarily for construction – as drafted, there is no hard timescale for the Applicant to carry out the restorative works which carries the risk of potential slow progress. We suggest that any restorative works are completed within 12 months of completion of the relevant stage of the Project A onshore works and Project A intertidal works, or such other period as the relevant planning authority may approve.	<p>The Applicants will provide an updated draft DCO at Deadline 1, which will reflect the change requested of a 12 month timeline for completion of restorative works.</p> <p>The same applies to Project B.</p>
RR-1616 1616.58	10.11 Requirement 18 – Control of noise during operational stage – while this requirement makes reference to the noise management plan, there is no specific sound level (in decibels) expressly stated	The Applicants maintain that Requirement 18 provides sufficient comfort that the Applicants will control operational noise. Requirement 18 requires an operational noise management plan to be approved by the relevant planning authority. That planning authority will therefore have appropriate

Reference	Relevant Representation Comment	Applicants' response
	which must not be breached at any time. This detail ought to be included given its significance.	levels of control over the Applicant's ability to commence operations, noting the Requirement 18(3) requires the Applicants to implement the NMP as approved.
RR-1616 1616.59	<b>Project B - Morecambe</b> 10.12 Many of the concerns are the same as for Project A but are listed here for completeness.	The Applicants note this response and confirm that the responses to Project A apply equally to Project B.
RR-1616 1616.60	10.13 Requirement 3 – Stages of authorised project – For clarity, a provision should be added or (3) modified so that it requires the Applicant to implement the scheme as approved by the relevant planning authority.	Please see response in relation to this issue above, which applies equally to Project B.
RR-1616 1616.61	10.14 Requirement 7 – Implementation and maintenance of landscaping – For clarity, a provision should be added requiring the Applicant to implement the landscaping scheme as approved under Requirement 6.	Please see response in relation to this issue above, which applies equally to Project B.
RR-1616 1616.62	10.15 There is no landfall construction method statement concerning works (Work Nos. 4B, 5B, 6B, 7B, 8B, 9B, 10B, 36B, 38B, 42B, 43B and 47B together with any other authorised development associated with those works and related ancillary works). A provision governing this process ought to be included to the effect that (1) no landfall construction work may commence until a method statement or equivalent has been submitted and approved by the relevant planning authority, and (2) the method statement referred to above is implemented as approved.	Please see response in relation to this issue above, which applies equally to Project B.
RR-1616 1616.63	10.16 Requirement 8 – Code of construction practice – (3) only concerns Project B onshore works, does this apply to Project B intertidal works? Please justify if not or otherwise amend to include Project B Intertidal works.	Please see response in relation to this issue above, which applies equally to Project B.
RR-1616 1616.64	10.17 Requirement 9 – Traffic and Transport – (3) only concerns Project B onshore works, does this apply to Project B intertidal	Please see response in relation to this issue above, which applies equally to Project B.

Reference	Relevant Representation Comment	Applicants' response
	works? Please justify if not or otherwise amend to include Project B Intertidal works.	
RR-1616 1616.65	10.18 Requirement 11 – Onshore archaeology – similar projects have been prescriptive with the detail that ought to be included in the archaeological written scheme of investigation. Please include further detail on what such schemes will cover.	Please see response in relation to this issue above, which applies equally to Project B.
RR-1616 1616.66	10.19 Requirement 13 – European protected species onshore – (3) only concerns Project B onshore works, does this apply to Project B intertidal works? Please justify if not or otherwise amend to include Project B Intertidal work	Please see response in relation to this issue above, which applies equally to Project B.
RR-1616 1616.67	10.20 Requirement 14 – Construction hours – construction hours on Saturdays are typically 0700 hours to 1300 hours, is there a justification for why the hours are 0700 hours to 1900 hours Monday to Saturday? For (3) a provision ought to be added to the effect that such approved works must be completed within the agreed time. The outline Code of Construction Practice at paragraph 1.6.2.1 provides that no core working will be undertaken on Sundays or Bank Holidays, except in exceptional circumstances. There is no inclusion or reference to such exceptional circumstances in Requirement 14. For the avoidance of ambiguity please detail what situations may give rise to such exceptions or if not required remove such wording as this carries the risk of establishing conflicting exceptions.	Please see response in relation to this issue above, which applies equally to Project B.
RR-1616 1616.68	10.21 Requirement 15 – Fencing and other means of enclosure – For clarity, a provision should be added requiring the Applicant to complete the fencing and other means of enclosure works as approved by the relevant planning authority.	Please see response in relation to this issue above, which applies equally to Project B.
RR-1616 1616.69	10.22 Requirement 16 – Restoration of land used temporarily for construction – as drafted, there is no hard timescale for the Applicant to carry out the restorative works which carries the risk of potential slow progress. We suggest that any restorative works are completed within 12 months of completion of the relevant stage of the Project B	Please see response in relation to this issue above, which applies equally to Project B.

Reference	Relevant Representation Comment	Applicants' response
	onshore works and Project B intertidal works, or such other period as the relevant planning authority may approve.	
RR-1616 1616.70	10.23 Requirement 18 – Control of noise during operational stage – while this requirement makes reference to the noise management plan, there is no specific sound level (in decibels) expressly stated which must not be breached at any time. This detail ought to be included given its significance.	Please see response in relation to this issue above, which applies equally to Project B.
RR-1616 1616.71	<p><b>Conclusion</b></p> <p>Given the above concerns, while the substations and existing cable corridors remain in their proposed locations, the Council opposes to these elements of the Project, and will continue to do so throughout the process until the Application has been withdrawn or their impacts have been reduced to acceptable levels, particularly given that the Applicant has failed to explore the Hillhouse option discussed above which offers a far more logical and suitable option to carry out the Project. In the Council's view, the Project, as proposed, simply disregards a number of crucial considerations stipulated in the NPPF, NPS and the FLDP as highlighted in this RR which must be addressed with due consideration as required and intended by the policy documents</p>	The Applicants have noted the concerns raised and have set out their responses above. In particular the Applicants refer to the responses at 1616.2, 1616.7 and 1616.15 in relation to site selection and grid connection matters. The Applicants have undertaken a full Environmental Impact Assessment which includes a detailed consideration of siting and routing options, as outlined in ES Volume 1, Chapter 4: Site selection and consideration of alternatives (AS-026) and where required, secured mitigation measures, to reduce potential impacts and/or effects as far as possible, as demonstrated in the ES and associated mitigation strategies (APP-015 to APP-169 and AS-024 to AS-057), and secured through the Commitments Register (AS-030).