

MORGAN AND MORECAMBE OFFSHORE WIND FARMS: TRANSMISSION ASSETS

The Applicants' Hearing Summary of the Issue Specific Hearing 1: Day 2



Deadline: Deadline 1
Application Reference: EN020028

Document Numbers:
MRCNS-J3303-BGS-19037
MOR001-FLO-CON-CAG-MOM-0013

Document Reference: S_D1_3
Rev: F01

20 May 2025

Document status

Version	Purpose of document	Approved by	Date	Approved by	Date
F01	Deadline 1	HK	May 2025	IM	May 2025

Prepared by:**Burges Salmon LLP and CMS****Prepared for:****Morgan Offshore Wind Limited,
Morecambe Offshore Windfarm Ltd**

Contents

1	THE APPLICANTS' HEARING SUMMARY OF THE ISSUE SPECIFIC HEARING DAY 1.....	1
1.1	Introduction.....	1
1.2	Hearing Summary ISH1 Day 2.....	2

Tables

Table 1.1: Hearing summary ISH1 Day 2.....	2
--	---

Glossary

Term	Meaning
400 kV grid connection cables	Cables that will connect the proposed onshore substations to the existing National Grid Penwortham substation.
400 kV grid connection cable corridor	The corridor within which the 400 kV grid connection cables will be located.
Applicants	Morgan Offshore Wind Limited (Morgan OWL) and Morecambe Offshore Windfarm Ltd (Morecambe OWL).
Biodiversity benefit	<p>An approach to development that leaves biodiversity in a better state than before. Where a development has an impact on biodiversity, developers are encouraged to provide an increase in appropriate natural habitat and ecological features over and above that being affected.</p> <p>For the Transmission Assets, biodiversity benefit will be delivered within identified biodiversity benefit areas within the Onshore Order Limits. Further qualitative benefits to biodiversity are proposed via potential collaboration with stakeholders and local groups, contributing to existing plans and programmes, both within and outside the Order Limits.</p>
Code of Construction Practice	A document detailing the overarching principles of construction, contractor protocols, construction-related environmental management measures, pollution prevention measures, the selection of appropriate construction techniques and monitoring processes.
Commitment	This term is used interchangeably with mitigation and enhancement measures. The purpose of commitments is to avoid, prevent, reduce or, if possible, offset significant adverse environmental effects. Primary and tertiary commitments are taken into account and embedded within the assessment set out in the ES.
Construction Traffic Management Plan	A document detailing the construction traffic routes for heavy goods vehicles and personnel travel, protocols for delivery of Abnormal Indivisible Loads to site, measures for road cleaning and sustainable site travel measures.
Design envelope	A description of the range of possible elements and parameters that make up the Transmission Assets options under consideration, as set out in detail in Volume 1, Chapter 3: Project Description. This envelope is used to define the Transmission Assets for EIA purposes when the exact engineering parameters are not yet known. This is also referred to as the Maximum Design Scenario or Rochdale Envelope approach.
Development Consent Order	An order made under the Planning Act 2008, as amended, granting development consent.
Direct pipe	A cable installation technique which involves the use of a mini (or micro) tunnel boring machine and a hydraulic (or other) thruster rig to directly install a steel pipe between two points.
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.

Term	Meaning
Environmental Statement	The document presenting the results of the Environmental Impact Assessment process.
Evidence Plan Process	A voluntary consultation process with specialist stakeholders to agree the approach to, and information to support, the EIA and Habitats Regulations Assessment processes for certain topics.
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.
Intertidal area	The area between Mean High Water Springs and Mean Low Water Springs.
Intertidal Infrastructure Area	The temporary and permanent areas between MLWS and MHWS.
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 Authority	A body empowered by law to exercise various statutory functions for a particular area of the United Kingdom. This includes County Councils, District Councils and County Borough Councils.
Local Highway Authority	A body responsible for the public highways in a particular area of England and Wales, as defined in the Highways Act 1980.
Main rivers	The term used to describe a watercourse designated as a Main River under the Water Resources Act 1991 and shown on the Main River Map. These are usually larger rivers or streams and are managed by the Environment Agency.
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
Maximum design scenario	The realistic worst case scenario, selected on a topic-specific and impact specific basis, from a range of potential parameters for the Transmission Assets.
Mean High Water Springs	The height of mean high water during spring tides in a year.
Mean Low Water Springs	The height of mean low water during spring tides in a year.
Micro-tunnel / micro-tunnelling	A tunnelling technique involving the use of a hydraulic (or other) jacking rig and a mini (or micro) tunnel boring machine to install a concrete tunnel between two points.
Mitigation measures	This term is used interchangeably with Commitments. The purpose of such measures is to avoid, prevent, reduce or, if possible, offset significant adverse environmental effects.
Morecambe Offshore Windfarm: Generation Assets	The offshore generation assets and associated activities for the Morecambe Offshore Windfarm.

Term	Meaning
Morecambe Offshore Windfarm: Transmission Assets	The offshore export cables, landfall, and onshore infrastructure required to connect the Morecambe Offshore Windfarm to the National Grid.
Morecambe OWL	Morecambe Offshore Windfarm Ltd is a joint venture between Zero-E Offshore Wind S.L.U. (Spain) (a Cobra group company) (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 Offshore Wind Project: Generation Assets	The offshore generation assets and associated activities for the Morgan Offshore Wind Project.
Morgan Offshore Wind Project: Transmission Assets	The offshore export cables, landfall and onshore infrastructure required to connect the Morgan Offshore Wind Project to the National Grid.
Morgan OWL	Morgan Offshore Wind Limited is a joint venture between bp Alternative Energy Investments Ltd. and Energie Baden-Württemberg AG (EnBW).
National Grid Penwortham substation	The existing National Grid substation at Penwortham, Lancashire.
National Policy Statement(s)	The current national policy statements published by the Department for Energy and Net Zero in 2023 and adopted in 2024.
Offshore booster station	A fixed structure located along the offshore export cable route, containing electrical equipment to ensure bulk wind farm capacity can be fully transmitted to the onshore substations.
Offshore substation platform(s)	A fixed structure located within the wind farm sites, containing electrical equipment to aggregate the power from the wind turbine generators and convert it into a more suitable form for export to shore.
Offshore export cables	The cables which would bring electricity from the Generation Assets to the landfall.
Offshore export cable corridor	The corridor within which the offshore export cables will be located.
Offshore Permanent Infrastructure Area	The area within the Transmission Assets Offshore Order Limits (up to MLWS) where the permanent offshore electrical infrastructure (i.e. offshore export cables) will be located.
Offshore Order Limits	See Transmission Assets Order Limits: Offshore (below).
Offshore substation platform(s)	A fixed structure located within the wind farm sites, containing electrical equipment to aggregate the power from the wind turbine generators and convert it into a more suitable form for export to shore.
Onshore export cables	The cables which would bring electricity from the landfall to the onshore substations.
Onshore export cable corridor	The corridor within which the onshore export cables will be located.

Term	Meaning
Onshore Infrastructure Area	The area within the Transmission Assets Order Limits landward of MHWS. Comprising the offshore export cable corridor from MHWS to the transition joint bay, onshore export cable corridor, onshore substations and 400 kV grid connection cable corridor, and associated temporary and permanent infrastructure including temporary and permanent compound areas and accesses. Those parts of the Transmission Assets Order Limits proposed only for ecological mitigation and/or biodiversity benefit are excluded from this area.
Onshore Order Limits	See Transmission Assets Order Limits: Onshore (below).
Onshore substations	The onshore substations will include a substation for the Morgan Offshore Wind Project: Transmission Assets and a substation for the Morecambe Offshore Windfarm: Transmission Assets. These will each comprise a compound containing the electrical components for transforming the power supplied from the generation assets to 400 kV and to adjust the power quality and power factor, as required to meet the UK Grid Code for supply to the National Grid.
Preliminary Environmental Information Report	A report that provides preliminary environmental information in accordance with the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017. This is information that enables consultees to understand the likely significant environmental effects of a project, and which helps to inform consultation responses.
Renewable energy	Energy from a source that is not depleted when used, such as wind or solar power.
Scour protection	Protective materials to avoid sediment being eroded away from the base of the foundations due to the flow of water.
Substation	Part of an electrical transmission and distribution system. Substations transform voltage from high to low, or the reverse by means of electrical transformers.
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).
Transmission Assets Order Limits	The area within which all components of the Transmission Assets will be located, including areas required on a temporary basis during construction and/or decommissioning (such as construction compounds).
Transmission Assets Order Limits: Offshore	<p>The area within which all components of the Transmission Assets seaward of Mean Low Water Springs will be located, including areas required on a temporary basis during construction and/or decommissioning.</p> <p>Also referred to in this report as the Offshore Order Limits, for ease of reading.</p>
Transmission Assets Order Limits: Onshore	<p>The area within which all components of the Transmission Assets landward of Mean High Water Springs will be located, including areas required on a temporary basis during construction and/or decommissioning (such as construction compounds).</p> <p>Also referred to in this report as the Onshore Order Limits, for ease of reading.</p>

Acronyms

Acronym	Meaning
AIS	Air Insulated Switchgear
AOD	Above Ordnance Datum
BCA	Bilateral Grid Connection Agreement
CoCP	Code of Construction Practice
CoT	Project Commitment
CBRA	Cable Burial Risk Assessment
CfD	Contracts for Difference
CMS	Construction Method Statement
CSIP	Cable Specification and Installation Plan
CTMP	Construction Traffic Management Plan
DCO	Development Consent Order
DECC	Department of Energy and Climate Change
Defra	Department for Environment, Food and Rural Affairs
DESNZ	Department for Energy Security & Net Zero
dML	Deemed Marine Licence
EnBW	Energie Baden-Württemberg AG
EIA	Environmental Impact Assessment
EMP	Environmental Management Plan
EPP	Evidence Plan Process
ES	Environmental Statement
EWG	Expert Working Group
GIS	Gas Insulated Switchgear
HDD	Horizontal Directional Drilling
HGV	Heavy goods vehicle
HNDR	Holistic Network Design Review
HVAC	High Voltage Alternating Current
IALA	International Association of Marine Aids to Navigation and Lighthouse Authorities
IAQM	Institute of Air Quality Management
LAT	Lowest Astronomical Tide
MCA	Maritime and Coastguard Agency
MCZ	Marine Conservation Zone
MDS	Maximum Design Scenario

Acronym	Meaning
MHWS	Mean High Water Springs
MLWS	Mean Low Water Springs
MMO	Marine Management Organisation
MPS	Marine Policy Statement
MTBM	Mini (or micro) tunnel boring machine
NGESO	National Grid Electricity System Operator
NPS	National Policy Statement
NSIP	Nationally Significant Infrastructure Project
O&M	Operation and Maintenance
OSP	Offshore Substation Platform
OTNR	Offshore Transmission Network Review
PDE	Project Design Envelope
PEIR	Preliminary Environmental Information Report
PPP	Pollution Prevention Plan
PRoW	Public rights of way
SAC	Special Areas of Conservation
SAR	Search and Rescue
SPA	Special Protection Area
SNCBs	Statutory Nature Conservation Bodies
SSSI	Sit of Special Scientific Interest
SWMP	Site Waste Management Plan
TEP	Technical Engagement Plan
TJB	Transition Joint Bay
UK	United Kingdom
UXO	Unexploded Ordnance
WSI	Written scheme of investigation

Units

Unit	Description
%	Percentage
dB	Decibels
Kg	Kilogram
kHz	Kilohertz

Unit	Description
KJ	Kilojoules
km	Kilometres
km ²	Kilometres squared
kV	Kilovolt
m	Metres
m ²	Metres squared
m ³	Metres cubed
nm	Nautical mile
μPa	micropascal

1 The Applicants' Hearing Summary of the Issue Specific Hearing Day 1

1.1 Introduction

- 1.1.1.1 This document presents a written summary of Morgan OWL and Morecambe OWL, (together, 'the Applicants') oral case at the Issue Specific Hearing 1 (ISH1) Day 2. ISH 1 Day 2 on Morgan and Morecambe Offshore Wind Farms Transmission Assets Development Consent Order (DCO) application took place on 01 May 2025 at Grand Hotel Blackpool, Front, North Promenade Sea, Blackpool FY1 2JQ.

1.2 Hearing Summary ISH1 Day 2

Table 1.1: Hearing summary ISH1 Day 2

	Agenda Item	Notes
5. Scope of the proposed development		
	b) Proposed design parameters and project flexibility	<p>1) The ExA asked for the Applicants to explain the broad approach taken to the proposed design parameters, project flexibility and the use of the Rochdale envelope.</p> <p>2) The Applicants confirmed that they have adopted the Rochdale Envelope (“RE”) approach to the design of the Transmission Assets. The Applicants confirmed that the approach they have taken is to identify the maximum design envelope (“MDE”) in respect of the Transmission Assets and that those maximum parameters are considered within the Environmental Impact Assessment (“EIA”), which is commonly used for this type of development to ensure a ‘worst case’ is assessed.</p> <p>3) The Applicants noted that within the Project Description (“PD”) chapter (AS-024) there is a lot of detail around the maximum parameters which have been applied to the EIA and taken through the assessment. Those details have also carried through specific project chapters, and, where needed to define the scope of consent, the parameters assessed are secured through the requirements of the DCO (Requirements 2 and 5 of Schedules 2A and 2B, AS-004). The Applicants confirmed that the MDE is additionally secured through the works descriptions in the draft DCO and the corresponding Works Plans (AS-014, AS-015, AS-016, AS-017 and AS-018) which prescribe the redline boundary (“RLB”) and works areas – the RLB is referred to in DCO applications as ‘Order Limits’ - the works and works plans are used to define particular works that can take place in particular areas.</p>

	Agenda Item	Notes
		<p>4) In terms of project flexibility, the Applicants confirmed that they have sought to design a MDE for the purposes of the Transmission Assets, and where possible have identified separate development areas for each project because it is very important that the projects can be delivered independently of each other, which requires the use of separate but aligned corridors along the cable route. However the Applicants noted that there are certain areas where defining separate corridors is not possible due to the nature of the works e.g. works at the beach and around the care home, and up to the Transition Joint Bays ("TJB") in Work Nos 10A/10B. These are overlapping work areas.</p> <p>5) The Applicants sought to clarify a further point raised during ISH Day 1 regarding the splitting of cable corridors at Blackpool Airport and Blackpool Road Recreation Ground. In this area, the DCO authorises up to 4 cables in each of those corridors, <i>however</i> Requirement 5 of the draft DCO says within those two works, there is a total maximum of 6 cables, therefore it would not be possible for a total of 8 cables to be installed.</p> <p>6) The Applicants confirmed that not all parameters that have been set out in the PD chapter are fixed parameters for the purposes of the project, some of them are indicative. Where there are key parameters that need to be secured, those are secured through specific details in the development consent order.</p> <p>7) In response to the ExA's query around the use of indicative parameters in the MDE, the Applicants confirmed that some areas are indicative, where for the purposes of undertaking the assessment it is not considered to be material to the assessment. These are matters that are being provided for information, as opposed to being a key parameter required for assessing or defining the nature of the Transmission Assets.</p> <p>8) The Applicants confirmed that the RE prescribes the overall frame for the project. Unless there is a specific reason for setting a parameter, it is not necessary for all elements of it to be secured. The Applicants confirmed that, for example, things like the maximum substation footprint are prescribed through the DCO (AS-004) and through the Works Plans (AS-0014 – AS-0018). [Post-hearing note: The Applicants would also note that the draft DCO ensures through the drafting of the associated development within the works descriptions in Schedule 1 Part 1 and requirement 2 of Schedule 1 Part 2A and 2B, that authorised development must be carried out within the parameters assessed within the environmental statement.</p>

	Agenda Item	Notes
		<p>9) The Applicants confirmed that the MDE is managed is primarily through the DCO, the Works Plans and the outline management plans. [Post-Hearing Action Note: The Applicants have provided clarification about the maximum design parameters and the PD chapter of the Environmental Statement will be updated at a later deadline to reduce some of the language which may suggest wider flexibility than what has been assessed (ISH1_21)] (see Applicants' response to Hearing Action Points due at Deadline 1 (S_D1_5)).</p> <p>10) In response to suggestions that there was insufficient detail in the Application, the Applicants confirmed that the Application provides sufficient detail to understand what is proposed and how it will be taken forward. The Transmission Assets will be subject to further detailed design, which is very common for projects of this nature.</p>
	c) Proposed construction scenarios, stages (phases) and durations	<p>11) In response to the ExA's request for an explanation of why a seven year implementation period is required for the DCO, the Applicants explained that due to the complex nature of the Transmission Assets, and the fact that the consent will be for two separate projects, this is considered to be a reasonable time period and that there is precedent from other developments, including the Sheringham and Dudgeon DCO. The Applicants also confirmed that both the DCOs for each of Morgan Offshore Wind: Generation Assets and Morecambe Offshore Windfarm: Generation Assets have both sought to include a seven year implementation period so it is important that these are aligned.</p> <p>12) In respect of the Applicants approach to the proposed construction scenarios, stages and durations, the Applicants confirmed that they have adequately assessed concurrent construction and sequential construction. The assessment has considered a worst case scenario out of immediate sequential construction, concurrent construction or sequential construction with a maximum 4 year gap between the completion of Project A and the commencement of Project B (or vice versa).</p> <p>The Applicant clarified in relation to Requirements 3A and 3B in the draft DCO (AS-004), and the circumstances in which two or more construction stages would be required, that this is a standard requirement which ensures that in respect of discharge of outline plans and details, this doesn't need to be done across the whole project in one go. The Applicants confirmed that this is staging of where the works are carried out at a particular time from a geographic perspective. The Applicants confirmed that there is no authorisation within this DCO or within the Generation Assets DCOs that would allow phasing</p>

	Agenda Item	Notes
		<p>(i.e. part of the development to be constructed and then another part at a later date).. [Post Hearing Action Note: The Applicants have clarified their position on phasing and the circumstances in which more than one stage may be progressed in their response to hearing action point ISH1_23 (see Applicants' response to Hearing Action Points due at Deadline 1 (S_D1_5)).</p> <p>In respect of the sequential construction, the Applicants confirmed that the gap of four years has been used as the maximum duration that there could be between the projects, with both implementing within the 7 years.. [Post Hearing Action Note: The Applicants have provided a construction scenario programme plate graphic for the construction scenario with a 4 year gap between the projects in their response to hearing action point ISH1_24 (see Applicants' response to Hearing Action Points due at Deadline 1 (S_D1_5))].</p> <p>13) In relation to the worst-case assessment, the Applicants emphasised that the MDE scenarios are for entirely concurrent or entirely sequential construction, any potential overlap in between these two scenarios is covered by that maximum intensity assessment of each in any event.</p> <p>14) The ExA asked the Applicants to confirm what the approach would be removal of construction compounds, depending on the amount of time between completion of Project A and commencement of Project B.</p> <p>15) The Applicants confirmed that this would be dependent on the specific length of time between the projects, with consideration of the required 12 month period prescribed in the dDCO for restoration works post-construction. This would also be dependent on liaising with the local planning authority at the relevant discharge of requirements stage for Project A and the mobilisation of Project B (or vice versa). Where there are overlapping compounds (i.e. at landfall), there would be a need for Project A to restore that compound as is defined within the DCO, then there would be a gap and Project B would re-implement and further re-instate that same compound per Requirement 16 of the DCO (AS-004). In terms of impacts, that is considered within the sequential construction scenario assessment.</p> <p>16) The Applicants confirmed that the 35 year operational phase is what has been considered for the purposes of the EIA in terms of the assessment, but confirmed that there is no time limit on the operational lifetime within the DCO (AS-004) and that this is not standard practice for offshore windfarms.</p> <p>17) The ExA sought to clarify that even though the Applicants are noting an operational period of 35 years, that in making their recommendation to the Secretary, should they assume the infrastructure</p>

	Agenda Item	Notes
		<p>would be there on a permanent basis because there is no time limit. The Applicants confirmed that the projects cannot operate indefinitely, because they will be limited by the operational lifespan of the Morgan Offshore Wind: Generation Assets and Morecambe Offshore Windfarm: Generation Assets. However, for the purposes of the Transmission Assets, it is considered to be permanent infrastructure (although it will be decommissioned at the end of its lifetime).</p> <p>18) The Applicants confirmed that there are separate construction cable corridors proposed the Morgan and the Morecambe projects. The works that each project can carry out are limited to those corridors. That was one of the key reasons for identifying separate cable corridors for each project – so that it is clear as to which areas each project would be working in and where they have rights. It is not the case that each project could take the whole of the joint corridor for the purposes of its works.</p> <p>19) The Applicants maintained that it would not be necessary to impose a requirement to notify the LPA whether they are constructing concurrently or separately, on the basis that each will need to notify the LPAs of the staging of their works under Requirement 3A and 3B and therefore when works are being carried out.</p> <p>20) In respect of a requirement for the projects to construct together, or that the construction period would be time-limited, the Applicants emphasised that this would be unreasonable in terms of the way the Transmission Assets are being brought forward. The overall effect of either sequential construction or concurrent construction has been considered, and whether any likely significant effects with mitigation are required. None of the residual effects identified, either through concurrent or sequential construction, applying appropriate mitigation, would be such that consent could not be granted.</p> <p>21) The Applicants confirmed that even though there is a 30 month proposed construction period for one project, and a 36 month proposed construction period for the other, there will not be construction works across all areas of the Order Limits for the entirety of each projects respective periods.</p> <p>22) The Applicants noted that all temporary access points will be reinstated at the end of construction. The only exception is where the Applicants require a new permanent access off Leach Lane into Blackpool Airport.</p>

	Agenda Item	Notes
		23) The Applicants confirmed that the anticipated connection dates for availability of the power for the National Grid are indicative and could be subject to change.
	d) Co-ordination between Morecambe and Morgan projects	<p>24) The Applicants confirmed that in line with EN-5, they have set out in the ES how the environmental impacts of the proposal have been considered and ensured, geographically, that by co-locating the projects as far as possible, impacts are confined to smaller areas than if they had not been co-ordinated. In respect of impacts on agricultural land from the cable corridor, by aligning the two corridors together, there is a single area that is affected – the Applicants recognise that is potentially more intensive than it would be if there were two separate cable corridors, but by containing in a single area fewer landowners are impacted.</p> <p>25) The Applicants confirmed that the joint approach for the Transmission Assets has allowed for coordinated delivery by design in that the infrastructure siting and base design have been progressed holistically. The Applicants confirmed that the development of the joint outline management plans provides a consistent basis from which the detailed management plans will be developed, even if the projects were to come forward at slightly different timeframes. In comparing this to two separate DCOs being promoted, the process undertaken by the Applicants is inherently holistic.</p> <p>26) With regard to the assessment of differing construction scenarios, the Applicants previously confirmed how the EIA has considered these scenarios, on a worst-case basis. The Applicants have not undertaken a comparative assessment of the scenarios as this is not the purpose of the EIA assessment. However, the MDE is based upon the worst case construction scenario in terms of concurrent or sequential construction.</p> <p>27) The Applicants confirmed that information was available on all construction scenarios at statutory consultation stage - the information is still on the Project website in PEIR Vol 1 Chapter 3 para 3.6.1.2.</p> <p>28) The Applicants confirmed that in coordinating to minimise environmental and community impacts, the onshore substation site selection process was aligned from an early stage with the aim of siting the substations in proximity to one another to avoid infrastructure proliferation. The Applicants confirmed that by coordinating site selection and design, it reduces the number of communities affected or spreading the effect on the same community over a wider areas. The Applicants confirmed that rather than forcing co-location into immediate proximity, they have sited the substations such that their individual mitigation proposals are most effective, primarily landscaping</p>

	Agenda Item	Notes
		<p>and mitigation, drainage etc. This means that in a scenario where only one project is built, it is still sited appropriately.</p> <p>29) The Applicants also emphasised that undertaking a joint section 42 statutory consultation process ensured community concerns could be addressed in a more aligned manner.</p> <p>30) [Post Hearing Action Note: The Applicants have provided a note which demonstrates how the proposed co-ordination aligns with NPS Policy and HND in their response to hearing action points ISH1_25 and ISH1_26 (see Applicants' response to Hearing Action Points due at Deadline 1 (S_D1_5.6)).</p> <p>31) The Applicants reiterated that this is the first project that has been brought forward by two independent developers for transmission assets for two separate offshore windfarms within a single co-ordinated DCO. The Applicants confirmed that in this project, one project is not seeking rights to do works on behalf of the other – as there is not any ability for anticipatory investment or any mechanism for financial recovery between the Applicants where one does works on behalf of the other. The Applicants confirmed that in this case, they have two entirely separate companies with no mutual shareholders, which is set out in the funding statement – the Sheringham and Dudgeon Extension Projects DCO, by way of comparison, was promoted by a single applicant (Equinor, on behalf of two Joint Ventures in which it was a key shareholder). [Post Hearing Action Note: The Applicants have provided a separate document which compares the Applicants' corporate composition with other projects in their response to hearing action point ISH1_28 (see Applicants' response to Hearing Action Points due at Deadline 1 (S_D1_5.6))].</p> <p>32) With regard to how the Applicants will coordinate during the construction phase, the Applicants confirmed that (a) because of the proximity of projects to each other, they have to work together and there is no option not to do so because the infrastructure is co-located; and (b) through the mechanisms in the draft DCO (AS-004), and through the staging plan and the discharge of requirements under the DCO, if construction is happening concurrently the parties will need to coordinate between themselves to ensure they can construct concurrently. This will also be managed by the local planning authority in terms of staging plans and discharge of outline plans required to deliver the infrastructure.</p>

	Agenda Item	Notes
		<p>33) The Applicants emphasised that coordination between the projects will be an inherent part of the post-consent process, particularly with a need to undertake post-consent surveys, engage with landowners, and consult on the details of the updated management plans. Where the projects are constructing in a closer timeframe, they will clearly need to consult more closely on the outline management plans.</p> <p>34) In response to comments regarding the adequacy of consultation, the Applicants emphasised that the Application has been accepted for examination, therefore for the purposes of the Planning Inspectorate, the statutory requirements have been met. With regard to discharge of requirements post-consent, this would sit with the local planning authority, and members of the community will have a chance to engage with this process as they would for the discharge of a standard planning conditions.</p>
	e) Summary and update on cumulative effects and inter-relationships with other projects	<p>35) The Applicants explained the process followed to get to cumulative effects assessment (“CEA”) long list. The Applicants confirmed that this is a staged process, which starts by identifying a zone of influence for each project. The Applicants then screen those projects within the zone of influence resulting in a screening matrix, which was submitted with Application (APP-039). This identified where projects are taken into CEA, based on data confidence, temporal overlap or spatial overlap between developments. The next stage is to gather information on those projects which are taken forward. The final stage is the assessment itself, this is an iterative process and does continue throughout this exam period to include new projects or updates to existing projects that are now available. This updated screening will take account of new information.</p> <p>[Post Hearing Action Note: The Applicants have provided an updated Cumulative screening matrix and location plan in their response to hearing action point ISH1_29 (see Applicants’ response to Hearing Action Points due at Deadline 1 (S_D1_5)).</p> <p>36) The Applicants confirmed they are liaising with local authorities in terms of updating the CEA long list.</p>

	Agenda Item	Notes
		<p>37) In respect to the Moor Vannin wind farm, the Applicants confirmed that the application for the wind farm was submitted to the Isle of Man government in March – it has not yet been accepted meaning that there are no application details that can be considered. In respect of the transmission elements of Moor Vannin, which the Applicants understand will connect to Penwortham, again there is nothing concrete or in the public domain in respect of this including no EIA scoping. There is no information on consideration of potential routes or likely effects, and therefore there is insufficient information for the Applicants to consider this as part of the cumulative assessment – this will be monitored going forward and considered as appropriate.</p>
	<p>f) Proposed construction working hours and mobilisation period</p>	<p>38) With regard to construction working hours, the Applicants explained that the proposed core working hours of Monday – Saturday from 7am until 7pm were justified. The Applicants addressed a suggested comparison to the Awel y Mor DCO, noting that on this project the developer also had a clear justification as to why a whole working day on Saturday was required and that the final decision on working hours was made by the SoS.</p> <p>39) The Applicants emphasised that they are seeking 7am – 7pm Saturday core hours with an hour either side for mobilisation for efficiency – if the half day on a Saturday was lost, it could impact the overall duration of the construction works at any given location.</p> <p>40) The Applicants confirmed that the mobilisation hour at the start and end of each day is designed for workers to arrive on site and prepare the site, then at the end of the day to turn off equipment etc. No HGV deliveries would be permitted within this period.</p> <p>41) Management of HGVs will be through the Construction Traffic Management Plan (“CTMP”) which is secured by Requirement 9 of the draft Development Consent Order (AS-004). The Applicants explained that typically the CTMP will set out restrictions on arrival and departure times, particularly for HGVs. The Applicants explained that the majority of site materials will be coming from quarry suppliers who have a large fleet of vehicles and would be able to time their deliveries accurately to avoid waiting. The outline CTMP contains a suite of monitoring and intervention measures in relation this.</p> <p>42) In relation to the Saturday working hours and the impact on overall programme, the Applicants confirmed that this would cause delays to individual construction elements within the overall</p>

	Agenda Item	Notes
		<p>construction period, but is not anticipated to extend the 30 month construction period for the Morecambe Offshore Windfarm: Transmission Assets or the 36 month construction period for the Morgan Offshore Wind Project: Transmission Assets. [Post Hearing Action Note: The Applicants have provided details clarifying the impact of Saturday working hours in their response to hearing action points ISH1_27 and ISH1_30 (see Applicants' response to Hearing Action Points due at Deadline 1 (S_D1_5))].</p> <p>43) The Applicants confirmed that in order to minimise potential construction traffic impact on the community, there will be ongoing engagement with Lancashire County Council and National Highways. The Applicants acknowledged that there are areas of the CTMP which will need to be refined, and the Applicants are seeking to develop these further with the relevant stakeholders.</p>
	g) Community benefits	<p>44) The Applicants confirmed that community benefits will be provided in line with recent UK Government guidance. The Applicants explained that the reason there has not yet been detailed engagement around this was on the basis that the guidance was still anticipated; however, now that this has been published, the Applicants will start consultation on community benefits later this year.</p> <p>45) The Applicants emphasised that community benefit is not a material consideration for the Secretary of State in determining whether or not consent should be granted.</p> <p>46) In relation to broader local benefits of the scheme, the Applicants confirmed that a socio-economic assessment has been undertaken. The Applicants have proposed an outline Skills and Employment Plan (APP-239) which is secured through the draft DCO (AS-009) and this sets out the approach to securing various local benefits including recruitment and skills training. This would be finalised in conjunction with Lancashire County Council.</p> <p>47) [Post Hearing Action Note: The Applicants have provided a schedule of benefits for the local community in their response to hearing action point ISH1_31 (see Applicants' response to Hearing Action Points due at Deadline 1 (S_D1_5))].</p>
5. Scope and content of the applicants' assessments		

	Agenda Item	Notes
	a) Offshore ecology, including Habitats Regulations Assessment and Marine Conservation Zone issues	<p>48) The Applicants confirmed that it is their position that Measures of Equivalent Environmental Benefit (MEEB) are not required for the Transmission Assets, given the small scale long-term habitat loss. The Applicants confirmed that despite this a 'without prejudice' MEEB submission will be provided at Deadline 1, and this has been discussed with Natural England.</p> <p>49) With regard to potential EMF effects to the protected habitat in the Ribble Estuary, the Applicants maintain that the evidence provided to date is sufficient in order to screen out this concern. The Applicants emphasised a point of discussion from ISH Day 1 that the minimum cable burial depth below the estuary would be 6 metres (post hearing note: 7 metres was inadvertently stated during the hearing; this has been corrected to 6) and there is potential for this to be deeper; however even at the 6m depth the Applicants do not anticipate any EMF impacts as these are generally localised within one or two metres of the cable. Post-hearing note: The Applicants would signpost to their response to the Environment Agency's Relevant Representation RR-677 (PDA-010)</p> <p>50) The Applicants confirmed that they have been in ongoing discussions with Natural England around effects on the relevant Special Protection Areas (SPAs). The Applicants met with Natural England on 20th February 2025 and again on 28th April 2025. The Applicants have also undertaken a site visit with Natural England. A meeting was held following the site visit, with some final matters now being considered between the parties. Conversations around mitigation are ongoing at this time; the Applicants do believe that mitigation is available to ensure there is no adverse effect on the integrity of the SPAs and will provide feedback in due course as discussions progress.</p> <p>51) In regards to fish spawning, the Applicants confirmed that the seasonal restrictions on UXO clearance for the Generation Assets DCOs was in relation to piling operations which are not required for the Transmission Assets. The Applicants explained that UXO clearance is quite different in terms of potential effects, and that by its nature UXO clearance does not lead to significant behavioural impacts on marine mammals – the main focus of this impact is around injury. The Applicants confirmed that high-order UXO clearance will be removed from the draft DCO for the Transmission Assets, with low-order UXO clearance being retained due to the substantially reduced associated impact.</p> <p>52) The Applicants confirmed that if high-order UXO clearance is required, that the Applicants would seek a standalone marine licence from the Marine Management Organisation ("MMO"). [Post Hearing Action Note: The Applicants have provided a technical document explaining the</p>

	Agenda Item	Notes
		relationship between the proposed removal of high-order UXO and spawning season restriction requirements in their response to hearing action point ISH1_32 (see Applicants' response to Hearing Action Points due at Deadline 1 (S_D1_5)).
	b) Traffic and transportation	<p>53) The Applicants confirmed that at this stage it is too early to engage with supply chains to consider which ports are under consideration so the assessment focuses on the strategic road network. The Applicants are engaging with the relevant highways authorities and will continue to progress these discussions.</p> <p>54) The Applicants confirmed that engagement with Blackpool Council is welcome and will proceed in due course, and that further engagement with Lancashire County Council will continue.</p> <p>55) The Applicants confirmed that they are confident all necessary accesses can be delivered as set out within the project design envelope. The Applicants explained that they are looking at management measures, for example to reduce the amount of hedgerows which may need to be removed, however there is a need to balance the level of detail required at this stage – there are provisions at Requirement 10 of the draft DCO (AS-004) which secure finalised highways access management plans, and it also sets out the process for technical approval.</p> <p>56) With regard to concern around some of the roads being unable to accommodate two way movements and concern that some others are unable to accommodate HGVs, the Applicants confirmed that discussions are ongoing with Lancashire County Council. In any event, the Applicants are confident in the viability of the proposed access routes, and that there are engineering solutions available where required. The Applicants confirmed that at this stage no further data is believed to be required in order to validate the assessment, all data collected to date is correct and reliable. The Applicants have committed to provision of additional information requested by Lancashire County Council's highways team as part of collaborative working to ensure deliverability of the access strategy. The Applicants will provide this information to Lancashire County Council at Deadline 1.</p> <p>57) The Applicants clarified that in respect of the access from Lower Lane access for the Morecambe substation, this operational access will be used by light goods vehicles only during operation; that is cars, vans and 4 X 4's – not lorries.</p> <p>58) In relation to crash-map data, the Applicants confirmed that the data used was the latest validated data available at the point of the application, and that the CTMP has provision for continuous</p>

	Agenda Item	Notes
		<p>monitoring of road safety during the construction phase which applies bringing the data considered up to date. The Applicants confirmed that they are not currently aware of any more recent data.</p> <p>[Post Hearing Action Note: The Applicants have provided a note in relation to the justification for CoT 37, which allows operational and maintenance movements from 07:00 until 23:00, rather than this being restricted to normal working hours in their response to hearing action point ISH1_38 (see Applicants' response to Hearing Action Points due at Deadline 1 (S_D1_5)).</p> <p>59) The Applicants confirmed that in relation to road safety and fatalities the North West Ambulance Service, RNLI and the Fire Service were all consulted, and no concerns were raised.</p>
	c) Aviation (Blackpool Airport and Warton aerodrome)	<p>60) The Applicants confirmed that they are engaged with Blackpool Airport and BAE Systems ("BAE"). The Applicants emphasised one of the key construction commitments, CoT 105, which says that no construction works in the operational area of Blackpool Airport can commence until CAP791 approval is obtained. The Applicants confirmed that they are engaging with Blackpool Airport to enter into a cooperation agreement in respect of this.</p> <p>61) The Applicants emphasised that CAP791 is not a consent or licence which the Applicants need to obtain in order to undertake the works – this is for the airport to manage, and is a procedure for notifying the Civil Aviation Authority to ensure compliance with their CAA licence.</p> <p>62) The Applicants noted that in relation to the safeguarding assessment for Warton Aerodrome, BAE is responsible for safeguarding their systems, therefore any assessment which needs to be undertaken in relation to building heights is the responsibility of BAE in order to demonstrate compliance with its CAA licence. Notwithstanding this, the Applicants confirmed that they are working with BAE in order to provide the information needed for them to undertake the safeguarding assessment. The Applicants noted that the proposed substations are in close proximity to existing pylons which are 42 metres tall; the proposed substations will be a maximum of 30m tall so there is already taller infrastructure in the vicinity.</p> <p>63) The Applicants confirmed that engagement with BAE specifically is ongoing in order to agree the strategy for a bird strike mitigation plan. The Applicants emphasised that Warton Aerodrome does have an existing bird strike mitigation plan in place, therefore anything provided to them will be to implement along with their existing mitigation plan – the Applicants maintain that further assessment</p>

	Agenda Item	Notes
		<p>is not required. There are birds in the area already, and it is not proposed that new or additional birds would be introduced to the area.</p> <p>[Post Hearing Action Note: The Applicants have provided information explaining why they have not undertaken a bird strike safeguarding assessment in their response to hearing action point ISH1_40 (see Applicants' response to Hearing Action Points due at Deadline 1 (S_D1_5))].</p> <p>64) The Applicants emphasised that the Transmission Assets do not carry substantial safety risk or risk to life. Bird mitigation areas have been identified to mitigate bird displacement and the temporary effect of the cable corridor construction and installation and permanent habitat loss due the construction of the onshore substations – no new birds will be added as this is replacement habitat, and there are birds in the area already which are managed through existing bird strike mitigation plans. This is a heavily designated area, this is a measure to effectively provide some replacement feeding areas for these displaced birds – the Applicants have made it clear that they will work with BAE and Blackpool Airport in order to manage the risk.</p>
	d) Effects on agricultural land	<p>65) The Applicants confirmed that each construction compound is related to an individual part of the authorised development, and it would not be the case that any compound would remain in place for a seven year period. The Applicants confirmed that they are working with impacted farm holdings to look at implementation of measures, in order to ensure businesses can be supported and continue to operate during the construction period.</p> <p>66) The Applicants emphasised that if there was a substantial gap between the construction phase for each of the projects, that the compound land would be reinstated between each project. The land would be reinstated to the quality of agricultural land, and soil management plans will ensure that surveys are undertaken prior to the works in order that appropriate restoration can take place.</p> <p>67) The Applicants confirmed that in respect of utilising temporary possession powers in order to construct the Transmission Assets, Article 29 of the draft DCO (AS-004) requires that the land must be returned one year after completion of the works for which the possession was taken. This time period must be dictated by completion of works, rather than commencement, as at the point of commencement there cannot be absolute certainty of exactly how long any particular works might take.</p> <p>68) The Applicants emphasised that this approach is standard across a number of DCOs. The period for temporary possession cannot be restricted to a year from commencement of the works, as the duration of the works may extend beyond one year in a particular location.</p>

	Agenda Item	Notes
		<p>69) [Post Hearing Action Note: The Applicants have submitted their response to Relevant Representation – National Farmers Union (NFU) (RR-1596) pursuant to hearing action point ISH1_44 (see Applicants’ response to Hearing Action Points due at Deadline 1 (S_D1_13)). T</p> <p>70) In relation to agricultural land classification (“ALC”), the Applicants explained that the approach taken to ALC and soil surveys does provide for a robust baseline for producing the outline Soil Management Plan and determining potential impacts on ALC. Along this particular cable route, there is a lot of detailed soil information available, so the Applicants have a strong baseline position. Mapping, scoping and initial surveys were undertaken to identify the nature of the land classifications within the Order Limits.</p> <p>71) The Applicants confirmed that a precautionary approach was undertaken, in applying the highest ALC grade to any land where there was uncertainty as to the exact classification.</p> <p>72) [Post Hearing Action Note: The Applicants have provided a note which sets out how the Applicants soil surveys meet the tests at paragraph 5.11 of NPS EN-1 have been met in their response to hearing action point ISH1_45 (see Applicants’ response to Hearing Action Points due at Deadline 1 (S_D1_5.7))).</p> <p>73) The Applicants clarified than when reference is made to the soil management plans being approved for the appropriate stage, this relates to staging in a geographical sense. This is important because, for example, soil management at the airport and at the golf course area will be very different to the soil management needed across the cable route, so it is important that separate management plans can be prepared in order to best meet the needs of different areas.</p> <p>74) The Applicants confirmed that engagement with landowners is ongoing in relation to access and livestock practices. The Applicants apologised for an instance during pre-application surveys where a gate was left open – this was addressed with the relevant landowner at the time and there is now a clear management plan which will be implemented in order to minimise the risk of any further incidents.</p> <p>75) [Post Hearing Action Note: The Applicants have provided a separate document which sets out the distribution of individual land holdings within the order limits in their response to hearing action point ISH1_46 (see Applicants’ response to Hearing Action Points due at Deadline 1 (S_D1_5.8))).</p>

	Agenda Item	Notes
	e) Flood risk, hydrogeology and drainage	<p>76) The Applicants confirmed that engagement with the Environment Agency on flood risk is ongoing, and that a meeting was held on 24 April to discuss the Environment Agency's relevant representation. One of the key discussion points was in relation to their protective provisions – it is anticipated that these will be agreed during the examination period.</p> <p>77) In relation to United Utilities, the Applicants confirmed that protective provisions negotiations are ongoing.</p> <p>78) The Applicants noted that engagement with Lancashire County Council as lead local flood authority is ongoing and further updates to the protective provisions are being progressed.</p> <p>79) The Applicants confirmed that in crossing the sand dunes, this will be entirely be by way of trenchless underground crossing so there will be no impact to the overall height of the sand dunes, meaning that the works will not in any way impact the flood defence. In addition to this, the trenchless crossing exit pit will be at least 100 metres away from the sand dunes SSSI boundary in order to mitigate any impact risk. The Applicants also confirmed that there will be no concrete involved in the trenchless cable installation.</p> <p>80) In relation to substation drainage, the Applicants have produced an outline operational drainage management plan (APP-215) which sets out management of surface water drainage and outfalls to Dow Brook. The Applicants also confirmed that the restrictions in place over the cable corridor will still allow for any agricultural practice down to a depth of 0.6m to be undertaken without consent of the Applicants.</p>
	f) Onshore ecology, including biodiversity net gain	<p>81) Regarding bird strike and biodiversity areas, the Applicants noted that a strategic workshop was being arranged with Blackpool Airport and BAE which will focus on bird strike considerations, amongst other topics. The Applicants committed to provide an update to the ExA following this workshop which would include details of the site selection for the mitigation areas. (ISH1_39)</p>

	Agenda Item	Notes
		<p>82) In response to a query from the ExA regarding the need for a derogation case in the event that agreement could not be reached with Natural England, the Applicants noted that a meeting and site visit were held with NE on Monday 28 April at which both parties agreed orally that there was likely to be appropriate mitigation such that no derogation would be required. [Post Hearing Action Note: The Applicants have provided an update on discussions with Natural England in their response to hearing action point ISH1_33 (see Applicants' response to Hearing Action Points due at Deadline 1 (S_D1_5))].</p> <p>83) The Applicants noted that no further updates were required to the HRA application documents to reflect the construction scenarios statement, as the potential gap of up to four years between construction was already incorporated as part of the assessment.</p> <p>84) In response to queries and submissions regarding sand lizards, the Applicants noted that the Wildlife Trust would welcome additional information regarding sand lizards. The Applicants reiterated that sand lizards are very sensitive and, as such, any impacts from noise and vibration have been considered and a list of mitigation measures will be provided as part of the ecological mitigation plan. The Applicants also noted that vehicle movements would be on the existing track and, as there are not predicted to be a vast number of vehicle movements, the Applicants are not anticipating any damage to the dune systems or to sand lizard habitats. The Applicants also noted that, while the dunes were already accessible to the public, the Applicants would not be permitting site staff or personnel to go over the dunes. Work Numbers 6A and 6B, which encompass the SSSI, do not allow for construction pedestrian access within the dunes which secures this.</p> <p>85) The Applicants confirmed that the type of fencing to be used was not anticipated to impact hedgehogs.</p> <p>86) In response to submissions made regarding Biodiversity Net Gain, the Applicants noted that the requirement to provide BNG is not a legal requirement for NSIPs and, as such, it is being provided voluntarily as noted in the Biodiversity Statement. The Applicants noted that the biodiversity benefit areas are not the same as the mitigation areas that have been noted by IPs as requiring further</p>

	Agenda Item	Notes
		consideration for bird strike and clarified that this would be discussed when the Applicants met with BAE/Blackpool Airport.
	g) Onshore archaeology and other heritage assets	<p>87) The Applicants committed to provide an updated map showing plot numbers and relating more clearly to the Work Numbers in respect of the Quaker burial grounds at Deadline 1. [ISH_50]</p> <p>88) In response to a query from the ExA regarding existing disagreement on the identified burial grounds, the Applicants clarified that they did not consider there to be any disagreement about burial ground locations. There is a small area of woodland known as Quakers Wood which is a recorded burial site for around 35 burials. There is an area in Freckleton Parish with woodland marked and described as a burial ground which sits in a larger field called 'burial yard' with two other fields nearby, one called lower burial yard and the other higher burial yard. The implication is that the burial ground could extend to those fields, but the first edition of the OS does not show burial grounds there. The Applicants have not seen or found any evidence for any burials outside the woodland itself. After statutory consultation, the Applicants moved the cable corridor so that it went outside the two burial yards on the south side of Lower Lane, crossing a piece of land named on the map as 'burial', but the whole of this section will be delivered through trenchless technology so no land marked on the map will be disturbed, although the Applicants do not know definitively whether there are burials there or not.</p>
	h) Landscape and visual effects of the proposed substations	89) The ExA suggested that, in the interest of time at the hearing, their submissions on landscape and visual effects of the proposed substations be postponed to written questions and written submissions.
	i) Effects on local business and tourism	90) In response to a query from the ExA on impacts to the tourist industry in the Fylde region, the Applicants noted that there is no statutory guidance on identifying socio-economic study areas so, instead, the Applicants have sought to use the best available non-statutory guidance which establishes a 60 minute commuting catchment area as local. The Applicants noted that, in terms of the appropriateness of the study area, what has been assessed is the tourism economy, which is a broad and varied receptor. In assessing tourism at an EIA level, a hyper-localised assessment would not provide sufficient robustness for the receiving economy, which operates in ways that make it difficult to define by picking a single town or local authority.

	Agenda Item	Notes
		<p>91) Regarding the 1940s festival and the Lytham Festival, the Applicants noted that these will be unaffected by the Project in terms of visual and recreational impacts as assessed. The Applicants have considered the interactions between viewpoints and how they might interact with tourism users and visitors as part of understanding the pathways that might affect tourism receptors.</p> <p>92) The Applicants committed to provide a note at Deadline 1 on how the assessment has been carried out and how it accords with the EIA Regulations. If the local authorities or other IPs are aware of evidence that links this type of project with an impact on the tourism economy, the Applicants would welcome sight of this, as the Applicants noted that this type of project has been consented and constructed in heavily populated coastal areas for a number of years and the Applicants are not aware of any evidence of an impact on tourism as a result.[ISH_52]</p>
7.	Draft Development Consent Order (DCO)	<p>93) [Post Hearing Action Note: The Applicants have provided page numbers for the table of contents to the draft DCO in their response to hearing action point ISH1_54 (see Applicants' response to Hearing Action Points due at Deadline 1 (S_D1_5))).</p> <p>94) It was noted by the ExA that both generation DCO applications have come to the end of examination and, as such, DCO provisions will have evolved to a more settled position. The Applicants committed to review the final versions of both generation dDCOs to seek to align wording where needed, with this actioned for Deadline 1, noting that there may require to be further updates depending on when decisions are made on those applications. [Post-hearing note: These updates are included in the Applicants revised dDCO (Document reference: C1/F03) at Deadline 1.]</p>