APPLICATION BY MORGAN OFFSHORE WIND LIMITED AND MORECAMBE OFFSHORE WINDFARM LIMITED FOR A DEVELOPMENT CONSENT ORDER FOR THE MORGAN AND MORECAMBE OFFSHORE WIND FARMS TRANSMISSION ASSETS

LOCAL IMPACT REPORT BY LANCASHIRE COUNTY COUNCIL UNDER SECTION 60 OF THE PLANNING ACT 2008

20th MAY 2025

Contents

1. Introduction

1.1. This report comprises the Local Impact Report (LIR) of Lancashire County Council (LCC) as a host authority for the Morgan Offshore Wind Limited and Morecambe Offshore Windfarm Ltd (the 'Applicants') scheme to construct, operate and decommission two electrically separate transmission systems connecting to the Morgan Offshore Wind Project Generation Assets and the Morecambe Offshore Windfarm Generation Assets ('the Scheme').

1.2. LCC has had regard to the purpose of LIRs as set out in s,60(3) of the Planning Act 2008 (as amended), DCLG's Guidance for the examination of applications for development consent and the Planning Inspectorate's Advice Note One, Local Impact Reports, in preparing this LIR.

2. Scope

2.1. This LIR only relates to onshore impacts of the proposed development as it affects the administrative areas of LCC.

2.2. Specifically, it is concerned with the impact above the Mean Low Water Springs set out in the Morgan and Morecambe Offshore Wind Farms: Transmission Assets Environmental Statement, Volume 1, Chapter 3: Project description. This identifies the key onshore components of the Transmission Assets for the Morgan Offshore Wind Project and the Morecambe Offshore Windfarm as including:

- Landfall comprising the landfall site: where the offshore export cables are jointed to the onshore export cables via the Transition Joint Bays (TJBs).

- Onshore elements including the onshore export cables: comprising the export cables which will be jointed to the offshore export cables via the TJBs at the landfall site, and will bring the electricity generated by the Generation Assets to the onshore substations. The cables will generally be installed through open cut techniques, but trenchless techniques, such as horizontal directional drilling, will be used where required, for example beneath roads and watercourses.

  The construction corridor for the cable will be typically 100m wide.

  From the landfall, the onshore export cable corridor will route east inland away from the coast. In the vicinity of Blackpool Airport, the cable route would split, with some cables passing in the northerly section of the Onshore Infrastructure Area through Blackpool Airport and the remaining cables passing further south through Blackpool Airport and the Blackpool Road Playing Field. Beyond Blackpool Airport and Queensway (B5261), the onshore export cable route corridor narrows and routes south east towards North Houses Lane. It then passes to the

north of Higher Ballam. The onshore export cable corridor then continues north east towards Halls Cross, north of Freckleton before reaching the onshore substation just west of Newton-with-Scales.

- Onshore substations: comprising two electrically separate onshore substations which will contain the components for transforming the power supplied via the onshore export cables up to 400 kV;

- 400 kV grid connection cables: comprising the export cables that will bring the electricity generated by the Generation Assets from the two electrically separate onshore substations to the existing National Grid substation at Penwortham;

- Environmental mitigation areas: comprising temporary and/or permanent areas, including accesses identified to provide environmental mitigation only; and

- Biodiversity benefit areas: comprising temporary and/or permanent areas, including accesses identified to provide biodiversity benefit only.

2.3. The impacts considered include those comprising all temporary and permanent areas landward of the MLWS required for the construction, and operation and maintenance of the electrical infrastructure.

2.4. This LIR does not describe the proposed development any further, relying on the applicant's description as set out in the Morgan And Morecambe Offshore Wind Farms: Transmission Assets Environmental Statement, Volume 1, Chapter 3: Project description.

2.5. This LIR takes into account the Morgan And Morecambe Offshore Wind Farms: Transmission Assets Environmental Statement, Volume 1, Chapter 3: Project description which sets out details of the measures adopted as a part of the Transmission Assets (Commitments). There are a range of mitigation and monitoring measures that have been identified through the Environmental Impact Assessment (EIA) process, to avoid or reduce potential effects. All measures to be adopted by the Transmission Assets are called 'Commitments' (CoTs). The CoTs will be used to guide the final design and details for construction, operation and maintenance, and decommissioning phases. These are listed in Table 3.2 of the Morgan And Morecambe Offshore Wind Farms: Transmission Assets Environmental Statement, Volume 1, Chapter 3: Project description.

2.6. This LIR focuses on the topic areas for which the County Council has a statutory responsibility such as highways, flooding and public rights of way. However, it also covers topic areas where the County Council routinely provides advice to district planning authorities (archaeology) as well as topics where the County Council has specialist resource and expertise such as ecology and landscape. This LIR does not seek to cover all possible environmental and planning

impacts and should be read in conjunction with the impact reports provided by the other host planning authorities within the project area.

3. Description of the Area

3.1. The proposed development site area including transmission assets and substations covers a diverse area from Lytham on the north west coast, eastwards across much of the rural area to the north west of Preston and Ribble Estuary, before crossing the River Ribble towards the existing National Grid substation immediately south west of Preston. The Lytham coast is popular for tourism/ beach users and wildlife, whilst the thin tranche of 'landscape' represented by the dunes, golf course and airport are the remaining 'green' elements which separate Lytham St. Annes from Blackpool immediately to the north.

3.2. The rural areas to the east of the coastal area are characterised by small to medium settlements set within countryside areas. There are development pressures on this area, from new roads and new residential development and more recently areas for solar farm installations.

3.3. The rural landscape comprises predominantly pasture with some arable field areas to the north and west of Preston; generally more arable fields are located to the south of Preston, but there is again a mixture of pasture and arable immediately adjacent to the substation site area. The landscape character of much of the area is strong.

3.4. The small scale field pattern immediately west of the Penwortham Substation possibly denotes an old field pattern. Elsewhere field pattern varies, to the west near to coastal areas are often large scale expanses of open fields, often with ditches as boundaries with a strongly regular field pattern. Moving eastwards the field pattern becomes more irregular and hedgerows become more prevalent, alongside small woodland blocks and prolific field ponds. Long and distant views are characteristic throughout a generally open, flat or gently rolling landscape, offering peace and tranquillity, to those using the public footpath/ bridleway network.

3.5. Beach areas provide a backdrop of dune, built development (around Lytham/Lytham St. Annes), public parks. They are extremely popular for users walking, often with dogs or runners, particularly during weekends, experiencing long views out across the estuary and expanses offering space, openness and tranquillity.

4. Planning History and Relevant Planning Policy

Planning History

4.1. The relevant County Council planning history in the vicinity of the site includes that set out in Table 3.1 below:

Table 3.1: Planning History

Reference No.	Site	Details	Issues
05/10/0634, 05/12/0729 & 05/13/0018	Annas Road former gas exploration site (fracking site).	Cable route passes immediately south of the site.	Aftercare period expired on the site. The boreholes were not drilled to their final depths and the site was never fracked due to technical difficulties.
LCC/2018/0019	Westby (Inert) Landfill site off Annas Road	Cable route passes immediately to the west and south of the site. Planning Permission expires in 2029.	Most likely no implications apart from traffic if the cable construction works coincide with landfilling operations.
5/09/0833	DRL Waste Transfer station, Annas Road	Waste Transfer Station site located immediately north of Annas Road on part of the former landfill. No issues part from maybe traffic on Annas Road.	No issues likely except perhaps traffic on Annas Road.
LCC/2014/0162	Clifton Marsh Landfill Site	Active and long standing landfill accepting household, commercial and industrial waste (including Low level nuclear waste). The cable route runs to the north of the site approximately 250 metres north of the landfill site.	

Relevant Planning Policy

National Planning Policy Framework

4.2. The National Planning Policy Framework (NPPF), which was updated in December 2024, is a material consideration. Relevant paragraphs include the following:

4.3. Paragraphs 5-6, 7-12, 58, 85-89, 109-110 115-118, 124-125 an 128, 131-141, 142-160, 161, 164-168,170-186, 187-195, 196-201 and 202-221 and 225 which are relevant with regard to nationally significant infrastructure projects, achieving sustainable development, planning obligations, the economy ,making effective use of land, promoting sustainable transport, achieving well-designed places, protecting the Green Belt, climate change and flood risk and coastal change, conserving and enhancing the natural environment and the impacts of pollution and noise on public health and historic environment, and the safeguarding of minerals.

National Policy Statements

4.4. Relevant NPSs include, the Overarching NPS for Energy (EN-1), the NPS for Renewable Energy Infrastructure Statement (EN-3) and NPS for Electricity Networks Infrastructure (EN-5).

Development Plan Policy

4.5. Development Plan policies relevant to the application comprise the following:-

Joint Lancashire Minerals and Waste Local Plan Core Strategy (February 2009)

4.6. The Minerals and Waste Development Plan for Lancashire was prepared jointly by Lancashire County Council and the two unitary authorities of Blackpool Council and Blackburn with Darwen Borough Council.

4.7. The key relevant documents of the Minerals and Waste Local Plan for Lancashire include the Core strategy and the Site Allocations and Development Control Policies Local Plan; there is also a Policies Map. The Core Strategy is the strategic document for future minerals and waste development in Lancashire. It sets out the vision, aims and objectives of the Minerals and Waste Local Plan, the principles by which development will progress over the planned period. It includes strategic policies required to deliver the vision.

4.8. Key relevant policies include the following:

- Policy CS1: Safeguarding Lancashire's Mineral Resources;
- Policy CS2: Minimising the Need for Mineral Extraction;
- Policy CS6: Promoting Waste Minimisation and Increasing Waste Awareness; and
- Policy CS7: Managing Waste as a Resource.

Joint Lancashire Minerals and Waste Local Plan Site Allocations and Development Control Policies Local Plan (September 2013)

4.9. The Site Allocations and Development Control Policies Local Plan is a combined document that identifies specific locations for development complete with inset maps showing the detailed extent of site allocations and safeguarding areas specific requirements for individual proposals and policies to ensure the

development of the identified locations is undertaken in line with the Core Strategy. It sets out development management policies to cover matters not covered in national policy including matters where local circumstances prevail.

4.10. Key relevant policies include the following:

- Policy NPPF1: Presumption in Favour of Sustainable Development;
- Policy DM1: Management of Waste and Extraction of Minerals;
- Policy DM3: Planning Obligations;
- Policy M2: Safeguarding Minerals

4.11. Lancashire County Council has also produced a guidance note to assist in implementing Policy M2 on mineral safeguarding.

Blackpool Local Plan Part 1: Core Strategy (2012-2027)

4.12. Relevant policies include the following:

- Policy NPPF1: Presumption in Favour of Sustainable Development;
- Policy CS3: Economic Development and Employment;
- Policy CS5: Connectivity;
- Policy CS6: Green Infrastructure;
- Policy CS7: Quality of Design;
- Policy CS11: Planning Obligations;
- Policy CS9: Water Management;
- Policy CS10: Sustainable Design and Renewable and Low Carbon Energy;
- Policy CS11: Planning Obligations;
- Policy CS21: Leisure and Business Tourism;
- Policy CS22: Key Resort Gateways;
- Policy CS24: South Blackpool Employment Growth; and
- Policy CS27: South Blackpool Transport and Connectivity.

Blackpool Local Plan Part 2

4.13. Relevant policies include the following:

- Policy DM7: Provision of Employment Land and Existing Employment Sites;
- Policy DM8: Blackpool Airport Enterprise Zone;
- Policy DM17: Design Principles;
- Policy DM19: Strategic Views;
- Policy DM21: Landscaping
- Policy DM28: Non-Designated Heritage Assets;
- Policy DM30: Archaeology;
- Policy DM31: Surface Water Management:
- Policy DM33: Coast and Foreshore:
- Policy DM35: Biodiversity;
- Policy DM36: Controlling Pollution and Contamination;

- Policy DM41: Transport Requirements for New Development: and
- Policy DM42: Aerodrome Safeguarding.

Fylde Local Plan to 2032 (incorporating Partial Review) Adopted December 2021

4.14. Relevant policies include the following:

- Policy GD1: Settlement Boundaries;
- Policy GD2: Green Belt;
- Policy GD3: Areas of Separation;
- Policy GD4: Development in the Countryside;
- Policy GD7: Achieving good design in development;
- Policy HW1: Health and Wellbeing;
- Policy INF1: Service Accessibility and Infrastructure;
- Policy CL1: Flood Alleviation, Water Quality and Water Efficiency;
- Policy CL2: Surface water run off and sustainable drainage;
- Policy CL3: Renewable and low carbon energy generation
- Policy ENV1: Landscape;
- Policy ENV2: Biodiversity; and
- Policy ENV5: Historic Environment.

Central Lancashire Adopted Core Strategy July 2012

4.15. Relevant policies include the following:

- Policy 1: Locating Growth;
- Policy 16: Heritage Assets;
- Policy 17: Design of New Buildings;
- Policy 18: Green Infrastructure;
- Policy 21: Landscape Character Areas;
- Policy 22: Biodiversity and geodiversity;
- Policy 24: Sport and Recreation;
- Policy 28 : Renewable and Low Carbon Energy Schemes;
- Policy 29 : Water Management; and
- Policy 31: Agricultural Land.

Preston Local Plan 2012-2026

4.16. Relevant policies include the following:

- Policy ST2: General Transport Considerations:
- Policy EN1: Development in the Open Countryside;
- Policy EN2: Protection and Enhancement of Green Infrastructure;
- Policy EN3: Future Provision of Green Infrastructure;
- Policy EN8: Development and Heritage Assets;
- Policy EN9: Design of New Development;
- Policy EN10: Biodiversity and Nature Conservation; and

- Policy EN11: Species Protection.

South Ribble Local Plan (Adopted July 2015)

4.17. Relevant policies include the following:

- Policy A1: Developer Contributions;
- Policy G1: Green Belt;
- Policy G8: Green Infrastructure and Networks – Future Provision;
- Policy G12: Green Corridors/Green Wedges;
- Policy G13: Trees, Woodlands and Development;
- Policy G16: Biodiversity and Nature Conservation; and
- Policy G17: Design Criteria for New Development.

5. Strategic Policy Context

5.1. In terms of relevant development plan policy, the key initial point to note is that there is no directly applicable development plan policy that is concerned with the provision of renewable energy infrastructure in support of off-shore windfarm development. The on-shore development includes the infrastructure to provide the export cable and associated grid link including new electricity substations.

5.2. The key issues from an LCC perspective relate to the environmental, amenity , highways and land use impacts of the development and how the application is should be determined in relation to relevant policy including the strategic objectives of mitigating climate change and the appropriateness of the location of the development.

National Planning Policy

5.3. The National Planning Policy Framework (NPPF), which was updated in December 2024, is a material consideration. It sets out national policy including in paragraph 11, the presumption in favour of sustainable development, which applies when determining planning applications. This means approving development proposals that accord with an up-to-date development plan without delay. Specifically in relation to meeting the challenge of climate change, the NPPF was updated in December 2024, to reinforce support for proposals that support the drive to mitigate and adapt to the effects of climate change. One of the key changes in the updated NPPF is that the planning system should support the transition to net zero, take full account of all climate impacts and support renewable and low carbon energy infrastructure (paragraph 161).

5.4. It makes clear that when determining planning applications for renewable and low carbon energy development and their associated infrastructure, that local planning authorities should not require applicants to demonstrate the overall need for renewable or low carbon energy, and give significant weight to the

benefits associated with renewable and low carbon energy generation and the proposal's contribution to a net zero future (paragraph 168).

5.5. It further states that once suitable areas for renewable and low carbon energy have been identified in plans, local planning authorities should expect subsequent applications for commercial scale projects outside these areas to demonstrate that the proposed location meets the criteria used in identifying suitable areas (paragraph 169). The project in this case is not identified in the Local Plan.

5.6. The NPPF in paragraph 5 makes clear that it "does not contain specific policies for nationally significant infrastructure projects. These are [instead] determined in accordance with the decision making framework in the Planning Act 2008 (as amended) and relevant national policy statements for major infrastructure, as well as any other matters that are relevant (which may include the National Planning Policy Framework)". Of relevance to this application, it also makes clear that "national policy statements form part of the overall framework of national planning policy, and may [also] be a material consideration in…making decisions on planning applications".

5.7. Relevant NPS policy is set out in the Overarching NPS for Energy (EN-1), the NPS for Renewable Energy Infrastructure Statement (EN-3) and NPS for Electricity Networks Infrastructure (EN-5).

5.8. The Overarching NPS for Energy (EN-1) (December 2023) sets out national policy for the national energy infrastructure. This includes the background to the NPS, including the urgent need for significant amounts of large-scale energy infrastructure in meeting government's energy objectives.

5.9. It refers to the publication in October 2021 of the Net Zero Strategy, which sets out the government's vision for the transitioning to a net zero economy and the policies and proposals for decarbonising all sectors of the UK economy to meet the country's net zero target by 2050 (paragraph 2.3.2). It stresses the need to transform the energy system, tackling emissions while continuing to ensure secure and reliable supply and it identifies that central to this is increasing the supply of clean energy from renewables, nuclear and hydrogen manufactured using low carbon processes (low carbon hydrogen) (paragraph 2.3.6).

5.10. The NPS makes clear that applications for the types of infrastructure covered by the NPS are to be determined on the basis that the government has demonstrated that there is a need for those types of infrastructure which is urgent and that substantial weight should be given to this need when considering applications. It also makes clear that the consideration of the specific contribution of any individual project to satisfying the need established in the NPS is not required.

5.11. The NPS for Renewable Energy Infrastructure Statement (EN-3) (November 2023) in line with NPS EN-1 identifies that there is an urgent need for new electricity generating capacity to meet the UK's energy objectives and that electricity generation from renewable sources is an essential element of the

transition to net zero and meeting the UK's statutory targets for the sixth carbon budget (CB6). It identifies that the demand for electricity is likely to increase significantly over the coming years and could more than double by 2050. This it states could require a fourfold increase in low carbon electricity generation, with most of this likely to come from renewables. It sets out technology specific guidance, including that relating to offshore wind. It does not include detailed advice in relation to onshore connection infrastructure but it does refer to the need to consider the connection into the onshore transmission network, and that applicants are expected to define the precise route for offshore transmission infrastructure, including the wind farm export cable to the offshore transmission network connection point or onshore connection point, and the onshore and offshore locations of any associated infrastructure such as substations, including onshore transmission.

5.12. The NPS for Electricity Networks Infrastructure (EN-5) identifies that the security and reliability of the UK's current and future energy supply is highly dependent on having an electricity network which will enable the new electricity generation, storage, and interconnection infrastructure that the UK needs to meet the rapid increase in electricity demand required to transition to net zero, while maintaining energy security.

5.13. Of particular relevance to the current application is that it refers to the significant amount of new network infrastructure that is required in the near term to directly support the government's ambition to deploy up to 50GW of offshore wind capacity by 2030 and that there is an expectation that there will be a need for substantially more installed offshore capacity beyond this to achieve net-zero by 2050.

5.14. It identifies that the electricity network infrastructure to support the government's offshore wind ambition is as important as the offshore wind generation infrastructure itself, and that without the development of the necessary networks to carry offshore wind power to where it is needed in the UK, the offshore wind ambition cannot be achieved.

5.15. As identified in NPS EN-1, it refers to there being a critical national priority (CNP) for the provision of nationally significant low carbon infrastructure. It includes guidance on factors influencing site selection and design for new energy network infrastructure and it advises that account needs to be taken of the fact that the initiating and terminating points, or development zone, for of new electricity networks infrastructure is not substantially within the control of the applicant.

5.16. It identifies that siting is determined both by the location of new generating stations or other infrastructure requiring connection to the network, and/or system capacity and resilience requirements determined by the Electricity System Operator. It states that these twin constraints, coupled with the government's legislative commitment to net zero by 2050, and an ambition of up to 50GW of offshore wind generation by 2030, means that very significant amounts of new electricity networks infrastructure is required, including in areas with comparatively little build-out to date.

5.17. Nevertheless, it identifies that applicants retain control in managing the identification of routeing and site selection between the identified initiating and terminating points or within the development zone, but that the exception to this is where the applicant is also responsible for the development of associated generation where the initiating point is substantially within the control of the applicant but the terminating point is not.

5.18. Whether or not this is the case, it states that this does not exempt applicants from their duty to consider and balance the site-selection considerations taking into account policies on good design and impact mitigation.

5.19. It acknowledges that the connection between the initiating and terminating points of a proposed new electricity line will often not be via the most direct route and that siting constraints, such as engineering, environmental or community considerations will be important in determining a feasible route.

5.20. It notes that there will usually be a degree of flexibility in the location of the development's associated substations, and that applicants should consider carefully their location, as well as their design. In particular, the applicant should consider such characteristics as the local topography, the possibilities for screening of the infrastructure and/or other options to mitigate any impacts.

5.21. As well as having duties under Section 9 of the Electricity Act 1989, (in relation to developing and maintaining an economical and efficient network), applicants must take into account Schedule 9 to the Electricity Act 1989, which places a duty on all transmission and distribution licence holders, in formulating proposals for new electricity networks infrastructure, to "have 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."

5.22. Within this overall policy context, it is clear that at least in terms of the principle of the development that it would satisfy the "critical national priority" (CNP) for the provision of nationally significant low carbon infrastructure".

5.23. Paragraphs 161 and 168 of the NPPF, similarly are clear about the significant weight that is to be attributed to the benefits associated with renewable and low carbon energy generation and proposal's contribution to a net zero future. They also make clear that applicants are not required to demonstrate need for renewable or low carbon energy, and that there is presumption of need built in the overarching policy framework.

5.24. The acceptability of the proposal in terms of principle is therefore clear. The extent to which it is qualified however rests upon the acceptability of the proposal in relation to the environmental, amenity , highways and land use impacts of the development and how the application should be determined in

relation to relevant development plan and other policy set out in Section 4 above and in Sections 7 to 13 below.

6. Consideration of Specific Environmental and Socio-Economic Impacts

6.1. The following section of this report analyses the likely local environmental impacts of the proposed development. These are considered under the following headings:

- Landscape and Visual Effects including Green Belts;
- Highways;
- Public Rights of Way (PRoW);
- Ecology;
- Drainage and Flood Risk;
- Historic Environment; and
- Land Use.

7. Landscape and Visual effects including Green Belt

7.1. This section of this LIR comprises the County Council's views on landscape and visual impact issues including on matters relating to the Green Belt and Area of Separation. The comments include detailed points on the design of landscaping. It is appreciated that these issues may well be raised in further discussions relating to the wording of requirements within the draft DCO or may be the subject of further submissions should the application be approved. However, the detailed comments do have significance for assessing the impacts of the proposals particularly in terms of the substation elements of the development and are therefore raised at this stage.

Planning Policy Context

Development Plan Policy

7.2. Relevant Development Plan policy includes the following:

- Blackpool Local Plan Part 1: Core Strategy (2012-2027), Policies CS6 and CS7;
- Blackpool Local Plan Part 2, Policies DM17, DM19 and DM21;
- Fylde Local Plan to 2032 (incorporating Partial Review) Adopted December 2021, Policies GD1, GD2, GD3, GD4, GD7, and ENV1
- Central Lancashire Adopted Core Strategy July 2012, Policies 17, 18 and 21;
- Preston Local Plan 2012-2026, Policies EN1, EN2 and EN9 ; and
- South Ribble Local Plan (Adopted July 2015) Policies G1, G4, G7, G8, G12, G13, and G17

Other Relevant Policy Documents

7.3. In addition to the development plan policies set out above, the following documents also need to be considered in relation to landscape and visual impact matters:

- Lancashire County Council - Flood Risk Management Strategy 2021-2027
- National Landscape Character Area No 32: Lancashire and Amounderness Plain: Natural England 2014a
- Lancashire County Council: A Landscape Strategy for Lancashire (2000)

National Planning Policy

7.4. Relevant national planning policy includes the following:

- National Planning Policy Framework (December 2024), Chapter 12, paragraphs 135-137 and 139-140, and Chapter 15, Paragraph 187.

7.5. In assessing the proposal the following documents have also been referenced:

- Landscape and Visual Impact Assessment 3rd Edition (GVLIA3) (Landscape Institute and Institute for Environmental Assessment (IEMA) 2013);
- Reviewing Landscape & Visual Impact Assessments (LVIA's) and Landscape and Visual Appraisals (LVA's) (Landscape Institute Technical Guidance Note 1/20 (10 Jan 2020);
- Notes and Classifications on Aspects of Guidelines for Landscape and Visual Impact Assessment Third edition (GLVIA3) (Landscape Institute Technical Guidance Note LITGN- 2024-01 Published August 2024);
- Landscape Sensitivity to Wind Energy Developments in Lancashire (25/02/2005) Lovejoy;
- Photography and Photomontage in Landscape and Visual Impact Assessment (Landscape Institute Technical Guidance Note Public Consultation Draft 2018-06-01).

<u>Key Issues</u>

Timescales

7.6. The applicant's statement states throughout that the two separate transmission assets and substations may not be built at the same time, and that they cannot afford greater clarity because flexibility is needed (Rochdale Envelope) (Item 3.3.1.7 of Project Description) and that effects as such consideration of the worse case scenario. The County Council considers that this raises several issues as follows:

7.7. It is difficult to accurately assess and review a scenario that may or may not happen or happen at different stages. The County Council considers that a guarantee is required that the development will not be prolonged and deals

with the reinstatement issues that will arise if only one of the windfarms and associated cable route is developed.

7.8. If only one windfarm and cable route is implemented (unknown given no guarantee) the County Council questions whether the route and location might or should significantly change from that indicated presently?

7.9. Equally, it is questioned whether the works are phased and if so how? This not stated and might affect the degree of impact and cumulative effects. It would be a useful method, both visually and on the landscape, to minimise effects. The timescales/programme of the cable construction is unclear. Document J2 (Item 1.1.5.3) refers to 'Stages' but does not go into anymore detail, therefore it is not possible to assess the potential impacts.

Sequential Development

7.10. The County Council would question whether if development is sequential it could be limited to one corridor of lesser width (rather than the 70-100m) at a time. One corridor could be then be reinstated whilst the other is in construction. This would minimise effects on landscape character. Also if both cable routes are developed, how does the applicant define responsibilities for reinstatement otherwise there are potential conflicts? Greater clarity is required.

7.11. With regard to PRoW, in the Open Space and Recreation Document it states that some footpaths may be closed for 3 months and some for 6 months. How does this work with the sequential or other scenarios – it difficult to assess the potential impacts.

7.12. The timescale for the development if it takes place in a sequential manner is quoted at between 4-5 years and it is stated that the worse case scenario is considered. However, there does not seem to be any certainty or means of control to ensure the development takes place in this manner. If there is a greater time period between each phase of the development, the landscape impacts and their significance will be very different from those assessed.

Planning Policy

7.13. Within the Planning Statement with regards to the Fylde Local Plan, there is recognition that the rural areas are 'threatened' by development. Policies GD2 and GD3 make reference to Green Belt and Areas of Separation, both required to identify the need to safeguard potential merging of settlements and therefore define the purpose of the rural area as creating this separation. The proposed Morgan and Morecambe Substations are within the defined Green Belt. The Morgan Substation is directly adjacent to the Area of Separation.

7.14. These policies should be at the core of any proposed development application, yet they are not always mentioned in the description of proposals, effects, or context of the site. This lack of reference plays down their importance. The

proposed substations will place an added and major significant pressure on the Area of Separation and would erode the separation that currently exists between existing settlements.

7.15. With reference to Green Belt it can be stated;

The NPPF (National Planning Policy Framework) sets out the government's planning policies for England and how they should be applied. The NPPF states that there is a general presumption against development in the Green Belt unless there are exceptional circumstances. The five purposes of Green Belt in the NPPF are: to check the unrestricted sprawl of large built-up areas, to prevent neighbouring towns from merging into one another, to assist in safeguarding the countryside from encroachment, and to preserve the setting and special character of historic towns.

7.16. Both substations are located within the Green Belt and include buildings that would be inappropriate development in the Green Belt as defined in paragraph 154 of the NPPF. Very special circumstances should therefore be demonstrated to justify this large scale development in the Green Belt. As stated in paragraph 160 of the NPPF, such very special circumstances may include the wider environmental benefits associated with increased production of energy from renewable sources. However, in the view of the County Council, a very special circumstances case should also include a lack of available sites out side of the Green Belt or other Green Belt locations which would have less impact such as the land adjacent to the existing Penwortham substation.

7.17. The Fylde Local Plan Policy ENV1 and GD7 make specific reference to landscape and design requirements of the proposed development- this is cross referenced to aspects of design.

7.18. In reference to the Blackpool Local Plan, Policy DM17 references the requirement for good design, however where proposals include works to Public Space and Recreational Areas and although reinstatement it is stated would be carried out, this cannot be qualified. Firstly, the exact nature of proposed works are not specified or detailed, therefore it is impossible to assess the degree and significance of landscape or visual effects. This is and should be clearly described and illustrated, with clear indication of effects and mitigation from Year 1 to Year 15 onwards and clearly state what happens with regards a sequential situation.

7.19. Preston Local Plan Policies EN1 and EN9, South Ribble Local Plan 2015 policies G1, G4, G7,G8 & G13 , Lancashire Core Strategy Policy 21 apply to landscape. They overlap and integrate to some extent with policies relating to ecological matters;

7.20. Design comments below directly relate to these policies.

7.21. The National Character Area (NCA) 32: Lancashire and Amounderness Plain provides several recommendations and observations with regards to Landscape Character, namely;

-The large number of ponds …are particularly important but a vulnerable resource'

SE01:'Managing and restoring any remnant landscape and habitat mosaics…focusing on river, watercourse and wetland landscape'

SE02: 'Conserve and manage field ponds'; 'Conserve and restore hedgerows and hedgerow trees'

SE03: 'managing development around the urban fringe….to enhance the distinctive character and countryside setting of the rural landscape';

'Encourage landscape buffers for development that impacts on land outside settlement boundaries, in order to limit the effect on the landscape'

'tree planting…where this can integrate new development or infrastructure'..

'Ensuring that significant built developments do not adversely impact the open character of the area'

'carefully ensuring light spillage is minimised, through lighting design, to minimise impact…on wildlife, particularly bats and birds'

SE04: 'Conserve and enhance…long, open views and landscape character..'

7.22. With reference to landscape character it notes:

7.23. *'small areas of Alder and Willow Woodland that have developed in some of the marl pits and ponds of the Fylde'*.

7.24. *'The northern Fylde coastal plain is predominantly improved pasture with isolated arable fields. It is a neat, ordered landscape with blocks of mixed woodland that punctuate the relatively flat to gently rolling plain'.*

7.25. *'conserve remaining field ponds- of landscape, historic, wildlife interest. Create new ponds to increase habitat diversity'.*

7.26. *'maintain the expansive landscape and tranquillity of the NCA through control of built development and avoiding vertical structures'*.

7.27. *'ensure that significant built developments do not adversely impact on the open character'*

7.28. *With reference to tranquility, occurring where there is a flat, low lying topography providing extensive views-remote areas-along the coast and inland in rural areas, it advises respect of long and open viewpoints and minimising light spillage'.*

7.29. Comments on the design in later sections of the LIR will demonstrate how these policies and this guidance have been fulfilled or otherwise.

7.30. The applicant's Environmental Statement states:

7.31. '*The coastal landscape is not located adjacent to or within the vicinity of a designated landscape and therefore does not contribute to the function of a more highly valued landscape'.*

7.32. *10.12.2.71 The landscape is not located adjacent to or within the vicinity of a designated landscape and therefore does not contribute to the function of a highly valued landscape.*

7.33. The County Council acknowledges that the proposal does not affect any areas with a statutory landscape designation but that does not mean that the development would not affect any area without landscape merit.

7.34. *10.12.2.72 This area is characterised by large geometric fields of improved pasture within flat or gently undulating lowland farmland. Woodland cover exists in shelter belts and ancient woodlands. Dense residential development and transport infrastructure traverse the landscape. The agricultural character of the area is becoming fragmented due to pressure of development'.*

7.35. The development is not dense and this statement implies a more urban character than exists by the small settlements which exist.

7.36. Item *10.12.3.11 The Outline Landscape Management Plan (document reference J2) sets out the landscape design proposals for **enhancement** of the local landscape, where practicable.*

7.37. Document *10.12.3.17 states 'The landscape is not designated for its scenic quality (although is in part designated as a Green Belt) and has a medium value and integrity largely due to its predominantly agricultural land use and typical rural characteristics of field system and scattered farmsteads (see Volume 3, Figure 10.4). The landscape has a medium capacity to accommodate the temporary construction activities associated with two substations and compounds within an open, rural/urban fringe context'.*

7.38. It is strongly disagreed that the landscape has 'medium capacity'. Changes are fundamentally different to the Landscape and Visual Character. There is nothing of a temporary nature that reduces this effect at this stage of the work. It has a low capacity for change.

7.39. *Document 10.12.3.18 states 'The direct impacts during the construction phase would be discordant in nature within an open agricultural, urban fringe landscape.*

7.40. Firstly, it is disagreed that this area is an urban fringe landscape. Secondly it is disagreed that there will be a change from Major adverse to Moderate adverse from Year 1 to Year 15. The substations would still be prominent and out of character and in the County Council's view would dominate the surrounding area.

Design

Transmission Assets: Cables

7.41. It is known that the cables will pass beneath the ground from the beach to within the Blackpool airport area by horizontal drilling at depth. It is unknown what form and what degree of impact this will make on the beach. There are no clear details, descriptions, length of time, or viewpoint to illustrate visual impacts during construction, when completed and how long this might impact on views and beachscape (either sequential nature or otherwise of the proposed development). Therefore it is impossible to assess the effects. More information is required which illustrates more than just baseline, but also construction impacts and on completion of construction. This should reflect the recommended guidance in terms of Year1, 5, and 15 as this is such a sensitive location.

7.42. Equally, it is unknown what manner of fencing will screen views of works during construction and given this is a public area it should commit towards aesthetically appropriate screening. It is not clear how this would work with tidal fluctuations? Further it is unknown how this would work in terms of the potential complexities regarding phasing of the development.

7.43. At between 70-100m wide and in places significantly wider the cable route would have significant impacts on the landscape and landscape character. It is appreciated that the construction works would be temporary. However unless construction of both cables is simultaneous or concurrent, the visual impacts could last up to 5 years or could be significantly more if the second cable construction is delayed. It is disappointing that firstly any ZTV (Zone of Theoretical Visibility) has not included the whole length of the cable route, to enable sufficient understanding and weighting of landscape and visual effects and that such assessment has only been carried out for the substations Equally there does not seem to be any description, scoring, or weighting given to these effects, given the potential magnitude over the potential sequential period of time. More detail and assessment should be provided.

7.44. As noted above, ponds are prolific and a characteristic throughout the area. Pond replacement should be minimum of like for like (Fylde Local Plan Policy ENV1) with reference to CoT22. It is unclear whether replacement ponds are proposed along the cable route. It appears ponds are categorized because of their wildlife value. NCA32 SE02 above recognises their value and encourages retention. Ponds that may not be necessarily valuable for wildlife, may be valuable for the wet woodland habitat (Alder and Willow) which seem to have developed in some ponds - a wet woodland habitat is nationally scarce. This

fact, guidance and presence does not seem to have been recognised throughout the pond assessment or documentation;

7.45. Pond proposals / restoration need to be clearly identified, described and detailed along the route. New ponds need to be accommodated and proposed in a natural manner to replicate the pattern of the landscape character.

7.46. It is accepted that BNG areas are proposed and will be of value. It is unknown how many ponds these might support, however in terms of ecology it is not necessarily a concentration in one area which is desirable (as the Morgan Landscape Strategy illustrates), but the ability for linking habitats, i.e. scattered throughout the landscape. Hence the need for replacement ponds along the length of the cable routes, not merely 5 crammed into an overly small area or not at all. More clarity and scheme development is required on this issue which reflects guidance on ponds and habitats.

7.47. Equally pond and or scrapes profiles and detailing should be agreed.

7.48. Landscape Impacts on Public Rights of Way: The PRoW are annotated and visual studies taken into account within the wider context of the transmission assets area, however it is subjective whether the extent of the visuals would be correct in terms of significance. Further assessment would be required to validate the degree of significance as annotated. Equally there is no statement to qualify what distances are applied by the consultant who has prepared the assessment.

7.49. Many PRoW will be affected as part of the transmission assets works. There is no detailing as to what rights of way restoration would comprise, particularly with regards to materials. Presumably where footpaths are located in agricultural fields, the existing surfaces would be replaced, but how would these be demarcated. Where located outside agricultural fields, rights of way should be reinstated using gravel or materials to replicate previous surfaces and if necessary replacement of appropriate stiles, gates and direction posts. Whatever is proposed needs to be sufficiently detailed.

7.50. Impacts on hedgerows :Conflicting information exists with regards to restoration of hedgerows. In places documents refer to restoration with like for like, other instances refer to restoration with species rich hedgerows. At times phrases such as 'wherever practicable',' subject to landowner agreement',' may' or 'might' are used to detail potential restoration. All hedgerows should be replaced, preferably with species rich hedgerows and also with trees planted within the hedgerows, albeit at agreed distances from cable routes and if necessary using root barrier protection. Hedgerows with trees are important features of the existing landscape character. Tree sizes should be minimum 10-12cm girth specification within hedgerows. Rabbit proof fencing may be necessary, and deer guards may be necessary as opposed to rabbit guards. Further comments are raise below regarding species.

7.51. There is reference to existing hedgerows being important (species rich) and not important-this terminology is misleading- even if a hedgerow is a monoculture such as hawthorn, it is still a native species, still provides food and shelter, characterises the landscape and provides ecological links.

7.52. It is essential that a nominated independent consultant verifies quality of soils to be used as part of restoration and to ensure the reinstatement is carried out correctly. It is imperative that compacted areas, such as haul routes and compounds are well broken up before spreading of any subsoil and topsoil. Subsoil treatment should be to appropriate BS standards as well as topsoil.

7.53. The cable route approaches the existing National Grid Substation at Penwortham from the north and west. This involves passing close to residential areas and through what appears may be an older type of landscape (small fields well defined by hedgerows) There is potential that the routing could be amended to avoid impacts on this area. For example, could the route originate from directly north to avoid conflicts with this area?

7.54. Any scheduled monument or heritage feature within the proposed cable alignment, needs to be appropriately recognized either by avoidance or translocated and restored on completion. The setting should be the same, or improved compared to the existing situation.

Substations and accompanying proposed landscaping

7.55. The Morgan Substation in its entirety is fundamentally not in keeping with the existing landscape character or Green Belt designation. The proposal introduces a very large scale, unsightly urban form, into an attractive and effective landscape, which operates successfully as part of a Green Belt designation. The Morecambe Substation, although still large and still out of character would be easier to accommodate, but still raises issues as noted below.

7.56. Whether the need and relevance of the proposed development is justified when assessed against reasons for permissible development in the Green Belt will need to be determined and/ or an alternative location proposedwhich results in less adverse effects to the landscape character and views.

7.57. The proposed location of the Morgan substation would weaken the remaining Green Belt land, particularly immediately west and north of the development, which would over time likely see piecemeal development within these areas, thus further reducing the effect of remaining Green Belt and cementing the urban boundary closer to designated Area of Separation.

7.58. It is queried whether the Brag Assessment takes into consideration or includes changes to the landscape character?

7.59. Main effects include;

- the building itself; height, massing, material type and form is-out of

character and is not aesthetic in its own right- a soft grey scale on drawings (Viewpoints) does little to demonstrate its actual appearance and to some degree enables a more sympathetic appearance than might actually be the case;

- foreshortening of views -change from an open landscape of long distance views; to large scale substation building with an urban focus, with associated fencing and lighting, external areas-hardstandings and storage;
- pattern of narrow regular fields lost, loss of scattered ponds;
- Planting of trees in a linear manner will further emphasise the linear element of the building;
- The introduction of mounds and bunds which are not characteristic features of the landscape character type;
- Loss of tranquillity through introducing urban elements into the urban landscape; see further comment below;
- Urban elements such as 3m high fencing particularly the use of palisade fencing which is unacceptable in a rural location-

7.60. The access track at 20m width is as wide as a large main road. It is queried whether this road needs to be as wide. Can it be designed with passing places, or significantly reduced in scale on completion of construction works?;

7.61. It is noted in the documentation that there would be elements of cut and fill associated with the substations. No detail of this has been provided, therefore it is not possible to assess effectively how the buildings would sit within the landscape in terms of levels, with reference to their surrounding area.

7.62. It is expected that cross sections would be provided to indicate levels and profiles of land change - these have not been provided;

7.63. Material for temporary/ permanent access tracks is not stated- likely to be MOT Type 1 for haul routes- this would probably be white limestone, which would be very noticeable within the landscape; The material surface on completion for access tracks is unknown.It is questioned whether a more appropriate material might be used to reduce landscape and visual impacts.

7.64. The access track to the Morecambe substation appears convoluted and cuts through several field areas. It would be preferable if existing tracks could be utilised to reduce impacts.

7.65. It is unacceptable to concentrate pond replacements in one small area. Ponds scattered throughout the landscape enable species to move throughout a landscape. It is unknown (drawing does not provide sufficient detail) what are proposed as scrapes and what are ponds as the drawing does not provide sufficient detail.

7.66. An attenuation pond does not constitute a pond replacement as it does not provide the same opportunities for wildlife, it is not designed with the same profiles/ margins and vegetation and it is designed solely to satisfy drainage

requirements . Equally the 'attenuation ponds' are by their location, scale and profiles not in keeping with landscape character (particularly with the Morecambe Substation, where it appears cramped into a form and appearance which fits site boundaries only and does not appear natural);

7.67. The scale of environmental mitigation (Landscape Strategy Figures 1.1, 1.2 and 1.3) as indicated is negligible compared to the scale of the proposed building (in both instances). Where feasible, the landscape mitigation should work with the landscape character in terms of landscape proposals, which should not necessarily be confined to a restricted site boundary. Off-site ponds and planting are required;

7.68. The PRoW/ Bridleway passes immediately west of the Morgan Substation. Very little space exists to mitigate the proposed development from the PROW. Equally where space does exist, screening is not proposed, other than scrub vegetation on a mounded area (See Viewpoint 1). It is unknown why there is no tree planting proposed at this location. Better mitigation is required, or proposals to divert the route of the footpath/ bridleway?

7.69. Tree Classifications (particularly A & B) as stated in the Arboricultural report should be checked by an independent arboriculturalist;

7.70. The species composition proposed for the woodland mix proposes many species that are not sufficiently tall growing to help screen the proposed substations, particularly when planted on a receding slope (Morgan-to the east down towards Dow Brook). Therefore, the proposed tree planting may not effectively screen the substations. As Ash can no longer be planted as part of a climax species (due to Ash Die back disease), it would be useful to introduce other species to supplement the oak, perhaps groups of Pine and Beech, which are larger growing and may help filter views more effectively. Equally it needs to be stated that Birch is used as a nurse species, which will mean that the numbers are reduced as climax species mature.

7.71. The Landscape Assessment states that the landscape has a medium capacity for change- (10.12.3.17). Where the Green Belt is situated directly adjacent the Area of Separation (i.e. the site of the Morgan substation) it is considered that the landscape has a low capacity for change, therefore its sensitivity is higher than stated and a greater than Significant Adverse Effect should be concluded.

7.72. The landscape strategy for the Morgan Substation (Figure 1.1. and 1.2) adjacent to Freshfield Farm looks contrived and is not in keeping with the landscape character.

7.73. Trees should be included within the proposed hedgerow restoration (albeit in consideration with guidelines for cables when appropriate). Off site planting of trees in hedgerows is recommended to strengthen the landscape character and to filter views of substations from residential properties (e.g. adjacent to Lower Lane and Parrox Lane).

7.74. Initial planting of native shrub, woodland and hedge species is preferable at 60-90cms not 40- 60cms, particularly around substations. Within the areas of woodland and hedgerow planting (associated with substation screening), planting should be larger growing tree specimens-min 14- 16cms girth / 3-4m height min.

7.75. Throughout the maintenance period, replacement planting should be sensitive to the sizes and types of planting that have been the more successful elements of planting.

7.76. It is unclear whether maintenance of the landscape proposals specifically around substation areas exists beyond the 5 year period? It should be clearly set out how the woodland and hedgerows will be managed to achieve a climax canopy. A longer period is required potentially up to 30 years.

7.77. The reference to proposed grassland is confusing. The existing grassland is classified as neutral, yet proposals for replacement specify EM6/EG9 for chalk and limestone soils? (i.e. alkaline).

7.78. Note the following specifics regarding planting proposals;

- Need to reference BS standards for subsoil suitable for planting/ seeding;
- Weed control needs to start in March and extend into October;
- Need to include for replacement planting/ seeding within maintenance activities;
- Watering to start in April to end in Sept & be inclusive of extensive dry periods;
- Indicate that Betula and Corylus are nurse species & specify % removal over time;
- Include groups of Pinus sylvestris (including larger specimens) and Fagus sylvatica to the woodland mix; specimens required into mix wherever close to public areas;
- Holly and Pinus to be container grown;
- Include Ulex europaeus (gorse) particularly closer to coastal areas;
- N.B. Ilex, Corylus, Salix caprea are not trees but shrubs, Ilex at best sub canopy- and should be managed as such;
- Include Rosa to hedgerow;
- Scrub is not a feature of the landscape character-it doesn't offer much in terms of screening. Preference for woodland.

7.79. Visual Impact Assessment / Scoring methodology:

7.80. It would assist the assessment if more than a representative view of the baseline condition at Viewpoint 19 were provided. As such it is impossible to fully assess the effects of the proposed development at this particularly sensitive location.

7.81. At times it is difficult to determine the angle of view to conceptual viewpoints. It is useful and usual to illustrate such points on small maps.

7.82. It is noted that in frequent instances the photographs taken are poor quality, either presenting a dull image or sometimes over exposed background. This does not allow a true impression of the landscape character, often preventing and obscuring long and distant views, within the viewpoint, which particularly characterise the landscape character in this location.

7.83. There is a question why Greenbank Farm and Freshfield Farm (closest to the Morgan Substation), are not noted as visual receptors?

7.84. There is objection to the frequent wording throughout the visual assessment that the substation areas are within urban fringe. This is considered incorrect. Urban fringe describes the direct periphery of existing urban development, often to larger settlements. The proposed development, particularly the substations is completely surrounded by agricultural fields, hedgerows and a rural landscape, is well within the Green Belt area and settlements are small.

7.85. There is also concern to the manner in which the wording of enhancement and mitigation are used within the document. Landscape Institute guidance states that enhancement should be used when the condition being proposed would be better than the existing situation, whilst mitigation should be used to describe measures taken to reduce the visual effects of the proposed development. The document periodically uses enhancement where it ought to be mitigation.

7.86. The lack of topographical information hinders assessment of the viewpoints. It is unclear how much higher/ lower areas adjacent are in relation to the proposed development. It is usual to describe levels within descriptions, but again this detail is lacking.

7.87. It is unknown the viewpoint locations were chosen, but obvious from assessment that on a couple of occasions the viewpoints are located at the furthest location from the site (namely The Bridleway adjacent the Morgan Substation and from along National Cycleroute 62). Landscape Institute guidance on taking photographs notes 'The role of the photographer is to microsite the camera to a location free from foreground screening'…

Viewpoints

Viewpoint 1

7.88. The document fails to annotate or inform the change in level, but it appears the footpath rises to the north. The substation therefore sits at the higher level and whilst the hedgerow (if it realistically is successfully retained with its immediate proximity to the construction site) might help screen at lower levels, might not be satisfactorily screened at its higher levels. The hedgerow is managed at a low level and therefore the majority of the development, unattractive urban fencing, unsightly built form and associated paraphernalia will be significant. It is considered that there would be a major adverse effect both at Year 1 and Year

15 both on landscape character and on views. There would be an erosion of the current openness, opportunity for distant views and blue skies and lack of tranquillity. In addition tree planting is not proposed at this location, only scrub (max height 2 - 3m) therefore built urban elements cannot be effectively screened or mitigated.

Viewpoint 2

7.89. This is a mid distance view, whereby effects are reduced with distance and taller foreground vegetation. Should the viewpoint have been located at the eastern end of Strike Lane, the viewpoint would have recorded a very different outcome. It would record far more prominent and significant impacts and likely major adverse effects. There is a large contrast therefore between the viewpoint recorded as negligible (arguably minor adverse), and circa a 200m difference of a likely major adverse. This viewpoint has been selected with foreground vegetation which significantly affects the outcome of the view.

Viewpoint 3

7.90. The representative and baseline photograph is important, despite the photograph being slightly dull and cloudy, particularly the winter baseline, which therefore blurs longer views, in that it illustrates the green and open agricultural landscape. No prominent roads or immediate 'urban fringe' are prominent. The slightly rolling landscape is visible into the distance. The edge of Newton with Scales is visible in the far distance.

7.91. It is disagreed that the magnitude of impact at construction or at Operation or Year 15 would be medium-high. There would a fundamental change to landscape character in this location, the degree of planting is minimal at this location and the associated fencing, lighting, poles, access track and hardstanding would be visible. The grey scale of the built form and fencing softens the impression of the built form and therefore misleads the assessor. It is unknown what levels or bunds are proposed given the lack of information, but estimations place the substation at the higher end of the landform within the immediate area.

7.92. Long and distant views would no longer be visible but replaced by built form. It is also likely that the Bluefield Solar Farm proposal would be seen in conjunction with the substation, should it be permitted.

7.93. Impacts are considered major adverse on landscape character and views both at Year 1 and Year 15.

Viewpoint 4

7.94. Representative viewpoint 4 baseline view (from the east looking west) (Figure 10.5.22) once again demonstrates the rural and agricultural context of the landscape character of the proposed development site/ area. Long, distant and open views characterise the view.

7.95. It is presumed that the summer viewpoint illustrating mitigation planting is Year 15 but this is not stated. The linear style mitigation planting which is also falling away to the Dow Brook (and therefore at reduced levels) as well as comprising species which cannot sufficiently screen the substation, emphasises the linear form of the Morgan substation. The latter alongside associated built development and paraphernalia would foreshorten views and would effectively create a new and closer urban edge.

7.96. Landscape character and visual effects would remain moderate adverse.

7.97. If the Bluefield Solar farm is implemented this would add to the viewpoint, which would then be dominated by built development. The Green Belt and Area of Separation would be effectively redundant in this location.

Viewpoint 5

7.98. The photographs are poor quality, dark, dull and cloudy (particularly during winter months), they present poor long and distant views and hinder appreciation of landscape character. Power lines and pylons are dominant in the view. The proposed substation development creates a new and closer urban edge in the distance foreshortening the Green Belt and rural area. It is likely it would be seen in association with the Bluefield Solar Farm (cumulative effects) increasing the urban influence and reducing the effectiveness of the Green Belt and Area of Separation designations. Seen in association, particularly during winter months, when hedges are short the combined effect would be moderate adverse.

Viewpoint 6:

7.99. It is apparent from the viewpoint that the land is rising towards the Morecambe Substation- from 7m AOD at the viewpoint to around 15m AOD, therefore at this point the substation appears on a raised plateau and as such will be more prominent. Should the substation have been proposed at the lower level, natural ground contours would have helped screen the built form and associated paraphernalia. The existing view is green, open skies and views extending in the very far distance towards properties towards the top of Parrox Lane.

7.100. Proposed mitigation would help screen the Morgan Substation in the distance, but the Morecambe Substation would remain prominent. As tree/ woodland planting only extends along the western edge at this point, screening is limited to scrub planting (max 2-3m height), it is unclear how the attenuation pond or the PRoW fit within the scenario of planting as illustrated. The tree line adjacent the attenuation pond appears very narrow on plan, therefore any screening again would be limited. The substation would remain prominent and dominant. It would create a new and unattractive urban edge, very visually prominent from the southern extent of the PRoW.

7.101. The foreground area illustrates post and mesh/ wire fencing. If these boundaries were enhanced by off site hedgerow and tree planting, filtered views of the substation would be substantially improved.

7.102. It is likely that should the Bluefield Solar Farm development be implemented this would also be seen within the view (cumulative effects) This would add to the visual and apparent loss of Green Belt and landscape character, through loss of openness and further urban elements. The Area of Separation would be considerably weakened/ lost.

Viewpoint 7

7.103. By illustrating the viewpoint to include the road junction presents an urban appearance. The Morgan Substation in its proposed location would effectively extend the urban area, as visually this would become the edge of built development.

7.104. The photographs are dull, particularly winter views, which does not enable full extent and appreciation of the distance of the view. The baseline view looking south would present rural agricultural fields towards the proposed development site and beyond into the distance.

7.105. The long views would be foreshortened and the effects are considered moderate adverse. In addition there would be little screening north and west of the proposed substation, which would increase its prominence.

Viewpoint 8

7.106. This is a mid distance view. It is unknown whether the agreed viewpoint was for mid distance or from National Cycleroute 62. If the latter, the cycle route passes much closer to the site along Kirkham Road. Effects therefore are much reduced with distance due to foreground vegetation. The Morgan Substation would be more prominent and present more adverse views from the cycle route at the closer proximity.

Viewpoint 12 (Bridleway BW0505016)

7.107. It should be noted that this viewpoint is selected from almost the most furthermost point on the bridleway (therefore at greatest distance from the Morgan Substation). A tree partially obscures the view.

7.108. The Viewpoint is at 20m AOD, but it is unknown what m AOD the proposed Substation is at, to aid assessment.

7.109. The photographs are over exposed, so again present a blurred impression, particularly of the long and distant views, that would be afforded from this location.

7.110. The existing view presents long distant views to hills beyond. These views would be foreshortened by the proposed development, which would effectively

create a new urban edge. Equally little planting on the north and western elevations limits effective screening.

7.111. As one approaches the site along this Bridleway, the effects would change from Moderate- Major Adverse at this location to Major Adverse closer to the Morgan Substation.

Viewpoint 13

7.112. This Viewpoint is also close to scattered properties along the A583 and they would experience similar views. Travelling west along the A583 the attractive view as experienced from this location and filtered views from nearby properties, particularly during winter months extends along its whole length as far as the junction with Kirkham Road. The full extent of Green Belt and Area of Separation is experienced, giving long, distant views of green agricultural fields, hedgerows and trees within the gently rolling landscape. The Landscape Character appears strong.

7.113. The photographs are again a little subdued, particularly those indicating winter views.

7.114. The Morgan Substation would completely destroy the rural outlook and distant views from this location. Landscape character would change, becoming urban from rural. The Substation and associated elements would create an imposing built form with visual 'clutter', all of which would become the new urban edge. The Area of Separation would be eroded and if the Bluefield Solar Farm is implemented the cumulative effects of both these developments would destroy effectively the Green Belt and Areas of Separation, as they currently exist in this location.

<u>General/ Documentation/ Other</u>:

7.115. It is usual practice to include topographical information in the form of a figure but this cannot be found in the assessment. It would be particularly helpful in aiding to read the landform within and around the substations, to aid assessment of views and the proposed development.

7.116. It is stated (Ecology Reports) that overall there is loss to woodlands through the whole scheme of 0.88% of woodland areas. It is noted that proposed woodland areas mitigation should be equivalent if not greater than that lost.

7.117. The Ecology Report notes that 27 No. ponds would be lost. All ponds should be replaced in similar locations as previously.

7.118. The assessment documents detail that restricted access to farming practices would be minimised, however this isn't sufficiently defined. If farmers are unable to access fields, the farming and agricultural pattern becomes affected, thus

affecting landscape character. The sequential nature could mean that areas are unavailable for prolonged periods of time. Areas could become unsightly and this undefined statement does not enable an accurate assessment of effects; i.e magnitude of effects / significance etc.

7.119. When Landscape Architects schedule contract works in the vicinity of residential areas (including compounds), works generally do not commence before 8 am or extend beyond 5pm, with no weekend work, unless by special agreement. The working hours as stated are not considered acceptable when close to residential areas.

7.120. Tranquility: No detail/ assessment has been provided. The PRoW adjacent to both substations will lack the tranquility of the existing situation. There are also potential noise issues from the substations which could further erode tranquility.

7.121. No study or assessment of night time effects- particularly lighting to substations appears to have been undertaken.

7.122. Statements regarding the ZTV are confusing. The Landscape & Visual Methodology (p.32) states that the ZTV should not account for the screening effects of vegetation or the built form -however this contradicts what is stated in 1.4.2.1 p12 which states that the ZTV uses built form and larger vegetation within the ZTV. The County Council's understanding is that it is usual not to include screening effects - it is unclear how the guidance has been implemented.

7.123. It is considered that landscape impacts have been down played in the presentation and manner of description of character in several instances (J3 2.2.1…& Landscape descriptions fail to capture the essence of the existing landscape, its green, open character, rolling landscape, its purpose in aiding/ direct proximity to Area of Separation),and its tranquility. Rather there is an emphasis on using 'urban fringe', which is misleading and incorrect.

7.124. It is strongly disagreed that the LCA in the vicinity of the proposed substation development, particularly the Morgan Substation has the capacity to withstand the changes.

7.125. The drawings are difficult to decipher particularly the graphics e.g. Fig 12 and 13 (Landscape Strategy) and Figure 1.1 Indicative Landscape Strategy Plan -the symbols are quite similar, especially when viewing at A3 scale;

7.126. The Landscape Strategy drawings / figures should also include footpaths etc. as landscape does not operate in isolation and needs to be read alongside those elements which pass through it and relate strongly. Equally to illustrate a drawing without such factors as the location of 3m high fencing and all the separate component buildings, storage, lighting elements of the proposed development does not enable accurate assessment and distorts the picture of proposed development.

7.127. It is usual when presenting viewpoints/ montages etc. to illustrate i) the existing situation ii) during construction/ Year 1 and Year 15 scenario, all with winter/

summer options, to enable a full assessment of proposals over time. The viewpoints presented do not detail the timescale. It is unclear when and why a single frame has been chosen at a particular angle. These often appear misleading in terms of presenting foreground vegetation only. It is queried why distance to the site and angle to the site are sometimes indicated with a '?' (as it is usual to denote) and it is usual to state how many frames are used for panorama views?

Cumulative Effects

7.128. It is considered that the assessment does not afford sufficient adverse weighting to the cumulative effect of both the Morgan Substation development and the Bluefield Solar Farm, both in terms of visual effects (see also viewpoint comments) and effects to the landscape character. When the two are associated and assessed it is clear to see that both developments in this area would significantly compromise both the Green Belt designation, the Area of Separation and the landscape character. Characteristics within this narrow strip would be significantly lost due to lack of rural character and specifically open areas and dominated with built development forms, fencing, lighting and associated urban features. Long distant views of green fields, hedges far into the distance would be replaced and foreshortened by development as noted above.

7.129. It is also considered incorrect to state (10.14.4.2 of Volume 3 Chapter 10 p 178) that the substations would not be visually obvious, when both developments would be seen in association. It is again incorrect to state (p181 of above document) that there would be no effects during operation and maintenance phase as the substation and solar farm would create ongoing effects of a significant nature.

7.130. It is questioned whether it can be stated that there are no cumulative effects within the landfall area, stating that development is underground and of a temporary nature. Cumulative effects might occur if the offshore windfarm development was occurring at the same time as the construction of transmission assets. The landfall area consists of a large compound area within the beach area, affecting both its intrinsic landscape character and the usage of the area. As the phasing and timescale of the proposed development is unknown, but potentially sequential, the effects and location of the compound area, with moving vehicles, high fencing, drilling equipment, storage of materials, even though 'temporary' could last up to 5 years, which is quite a long time. At what point of time does Moderate Adverse become Significant and Major Adverse and does 5 years qualify as Moderate or High?

7.131. There is no mention of cumulative assessment in association with existing pylons.

7.132. With regards to the existing substation at Penwortham there are several proposed battery storage developments noted. Further visual assessment

would be required to assess what the degree of effects might be of these with the proposed transmission assets, associated and existing development at this location.

Summary of Landscape / Visual Effects

7.133. The existing landscape character of the proposed substation sites consists of a rural, well utilised and managed agricultural landscape, with an irregular field pattern strongly defined by trees and hedgerows. Fields are characterised by frequent ponds, whilst long, open and distant views of a slightly rolling countryside present views as far as hills beyond.

7.134. Planning designations recognise the threat of development of the settlements of Kirkham and Newton-with-Scales merging and hence Green Belt and an Area of Separation exist to protect the rural area, and provide distinction between small scale settlements by maintaining openness.

7.135. The lack of a clear definition of timescale (potential sequential development), prevents accurate assessment of landscape impacts and potentially creates additional and prolonged adverse effects on landscape character, visual appearance and usage of the landscape.

7.136. The NCA succinctly describes threats to the landscape and places emphasis on the characteristics which need to be retained.

7.137. There is disagreement with some of the scoring elements from the Landscape and Visual Assessment, particularly those relating to the proposed substations.

7.138. More clarity is required with regards to the visual effects at Landfall. A further viewpoint assessment is recommended at this sensitive location.

7.139. Pond replacements need to be clarified and replicate the number, approximate location and pattern of those lost.

7.140. Enhancement is required for hedgerow replacement, not simply mitigation.

7.141. Size, species composition and detailing within the woodland mix, trees and hedgerows needs amendment and further detail.

7.142. Soils would need an independent consultant to verify quality.

7.143. The Morgan and Morecambe Substations are fundamentally out of character with the current strong rural and agricultural context of the landscape, categorised as Green Belt, within a designated Area of Separation directly adjacent and would foreshorten and destroy long and open views

7.144. Landscape 'Strategy' proposals are unable to screen the built form of the substations effectively. It is likely that ground levels would further limit the ability to screen and filter views;

7.145. Insufficient detailing is provided on levels and screen bunding .;

7.146. The scale and form of landscape mitigation is insufficient and does not work with the pattern of the landscape;

7.147. Maintenance operations/ strategy needs to be over a longer period than 5 years

7.148. Viewpoint information with the landscape assessment often consists of poor quality photographs, too dark or over exposed. This prevents an effective assessment and precise understanding of the long and distant views, which characterise specifically the Green Belt area and Area of Separation;

7.149. The wording of the assessment at times lacks impartiality or is simply incorrect. The constant use of 'urban fringe' to describe the substation site areas is considered incorrect. Equally there is incorrect usage of enhancement and mitigation;

7.150. There appears a lack of topographical information, which hinders assessment;

7.151. There is no detailed assessment of tranquillity;

7.152. There is confusion as to how the ZTV is presented and there should also be a night-time ZTV in relation to any lighting impacts.

7.153. The Landscape Strategy (Proposals) drawings/ Figures are over simplified. There needs to be more exact presentation of built form. Drawings/ figures should be accompanied by sections and cross-sections;

7.154. Viewpoints need to clearly define/ identify Year 1/ Year 15 scenarios;

7.155. There is very little detailing of cumulative effects;

7.156. Greater visual assessment at Penwortham Substation/ Grid connection would be useful to understand and fully assess the added structures and effects.

<u>Recommendations on landscape / visual effects</u>

Transmission Assets

7.157. It can be seen how the routing of the cables has endeavoured to avoid particularly sensitive sites which generally minimises effects. The cables should be able to be accommodated into the landscape, albeit effects could be significantly reduced by a narrower construction width/ margin (haul routes etc.) and precise detailing of the programme and timescale of operations. There would be concern should cable areas be defined with no works for periods of time, resulting in unmanaged, unused landscapes.

7.158. Should these matters alongside those raised within these observations be addressed, the cable elements of the transmission assets would be acceptable in relation to landscape / visual considerations..

Morgan and Morecambe Substations

7.159. There would be a preference generally, for the reasons as stated, for both substations to be located outside the Green Belt. They should ideally be located on an 'urban fringe' site or preferably close to industrial/ commercial areas/ Brownfield land. The applicant has not demonstrated any very special circumstances to justify the location of these elements of the overall development within the Green Belt

7.160. This Green Belt area is not considered to fall within the definition of Grey Belt

7.161. The Morecambe Substation alone (without Morgan) by reason of its smaller size, its location (albeit with some repositioning on lower ground levels and using enhanced off-site planting, and with a landscaping strategy that actually reflects the existing landscape character, could be accommodated without giving rise to unacceptable landscape impacts

7.162. The Morgan Substation however is considered inappropriate, by its specific location and scale, the amount of unattractive detail which would remain visible, dominant and could not be mitigated effectively. It would significantly weaken the Green Belt area, reducing long and distant views and place additional pressures upon the Area of Separation.

8. Highways

Planning Policy Context

Development Plan Policy

8.1. Relevant Development Plan policy includes the following:

- Blackpool Local Plan Part 1: Core Strategy (2012-2027), Policy CS5;
- Blackpool Local Plan Part 2, Policy DM41;
- Fylde Local Plan to 2032 (incorporating Partial Review) Adopted December 2021, Policy INF1; and
- Preston Local Plan 2012-2026, Policy ST2.

National Planning Policy

8.2. Relevant national planning policy includes the following:

- National Planning Policy Framework (December 2024), paragraphs 116-117

National Planning Policy Framework (NPPF)

8.3. Paragraph 118 of the NPPF states that “All developments that will generate significant amounts of movement should be required to provide a travel plan, and the application should be supported by a vision-led transport statement or

transport assessment so that the likely impacts of the proposal can be assessed and monitored".

8.4. Paragraph 116 of the NPPF states that "Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network, following mitigation, would be severe, taking into account all reasonable future scenarios".

8.5. Paragraph 117 of the NPPF states that "… applications for development should:

a. give priority first to pedestrian and cycle movements, both within the scheme and with neighbouring areas; and second – so far as possible – to facilitating access to high quality public transport, with layouts that maximise the catchment area for bus or other public transport services, and appropriate facilities that encourage public transport use;
b. address the needs of people with disabilities and reduced mobility in relation to all modes of transport;
c. create places that are safe, secure and attractive – which minimise the scope for conflicts between pedestrians, cyclists and vehicles, avoid unnecessary street clutter, and respond to local character and design standards;
d. allow for the efficient delivery of goods, and access by service and emergency vehicles; and
e. be designed to enable charging of plug-in and other ultra-low emission vehicles in safe, accessible and convenient locations."

8.6. The section below gives consideration to both Lancashire County Council's and Blackpool Council's highway network.

Key Issues

Project Stages and Duration

8.7. The Environmental Statement Non-Technical Summary states that, at this stage, the timings of construction activities are indicative. Table 7.17 of Traffic and Transport (ES Volume 3, Chapter 7) indicates the maximum design scenario considered for the assessment of impact of the project.

8.8. A six-day working week (Monday to Saturday 07:00 to 19:00) has been adopted. The Local Highway Authority (LHA) is concerned with construction works progressing all days on Saturdays as this would create conflict with trips for leisure and community purposes (all modes) as a consequence of there being greater recreational users on the highway network, as well as the presence of many visitors accessing the Fylde coast.

8.9. Whilst each site will be open for 12 hours per day, the hours during which access may be required would be greater than this. The documentation highlights vehicle operating hours (beyond each site) of 6am-8pm Monday to

Saturday. This will result in additional impacts of vehicles waiting on the public highway prior to the gates of working areas opening. No locations have been identified where waiting can be undertaken safely, without impacting on other users within or beyond the built environment, notwithstanding if the engines of vehicles are running or not. There is the further concern of HGVs waiting at the side of the highway, with wheels encroaching onto the footway and damaging this infrastructure, notwithstanding safety issues.

8.10. The Response to Rule 9 letter document (PINS reference: EN020028) explains the construction scenarios that authorisation is sought for. The Morgan Offshore Wind Project and the Morecambe Offshore Windfarm are being developed by two separate legal entities, each with different joint venture partners. They will be constructed and will remain electrically separate from one another with separate Bilateral Grid Connection Agreements (BCAs) with the National Energy System Operator (NESO). Notwithstanding, each offshore wind farm project has its own individual requirements and constraints, for example, their project funding. Therefore, there are multiple possible scenarios for the construction of the project, highlighted below:

i) <u>In Isolation:</u>

- Construction of the Morgan Offshore Wind Project: Transmission Assets only, with an indicative total construction duration of 36 months;

Or

- Construction of the Morecambe Offshore Windfarm: Transmission Assets only, with an indicative total construction duration of 30 months.

ii) <u>Concurrent Scenario:</u>

Construction of both project's transmission assets at the same time. Within this concurrent scenario, the two projects could be delivered as follows:

- Both projects start together (with the Morgan projected completed 6 months after the Morecambe project);

Or

- Both projects finish together (with the Morecambe project commencing 6 months after the Morgan project).

The Indicative Total Duration would be 36 months for concurrent construction, with either the same start or finish.

iii) <u>Sequential Scenario:</u>

One project is constructed first, then the remaining project second. In a sequential scenario, the second project will only commence after completion of the first.

In this scenario, the first project would establish its own working areas and reinstate them upon completion as part of its construction works, and then the second project would establish its own working areas and reinstate them upon completion as part of its construction works.

- Immediate sequential construction of the Transmission Assets with no gap would have an Indicative Total Duration of up to 66 months;

Or

- Sequential construction with a gap of up to a maximum of four years between the completion of the first project and commencement of the second project would have an Indicative Total Duration of up to 120 months, with construction activities only taking place for a combined period of 66 months.

8.11. The Maximum Design Scenario considered in the Traffic and Transport chapter of the Environmental Statement is the concurrent scenario. Table 1.18 of the Response to the Rule 9 letter justifies the use of the concurrent scenario in the assessment. While valid points are made, the LHA considers that consideration must be given to the sequential scenario, as there is no certainty as to which scenario will be adopted. This is a major concern for the LHA with much uncertainty.

8.12. While the Response to the Rule 9 letter suggests that the land would be reinstated from the first project, before the second commences in a sequential scenario, it is unclear if the accesses to the compounds and haul road, and the haul road itself would be reinstated. If the land is reinstated, and then the haul road and accesses reconstructed for the second project, this would incur large costs for the developer, and therefore it may be the case that the haul road and accesses are not reinstated. In this case, large accesses that are unused for long periods of time may become frequently parked in. This would then need to be mitigated against prior to the start of the second project. This is a major concern to the LHA with a large element of uncertainty.

8.13. Based on the project durations from the Response to Rule 9 letter (30 and 36 months), it is assumed that the elements in Table 8.1 below will run in parallel. Any delays to any element may delay the projects significantly.

Table 8.1 – Onshore Transmission Asset Elements and Durations

Onshore Transmission Asset and Duration	
Element	**Duration**
Landfall	24 months
Onshore Export Cables	36 months

Onshore Substations	30 months
400kV Grid Connection Cable	36 months

Compound Accesses

8.14. In order to deliver the permanent onshore transmission assets above, temporary construction compounds and construction access routes are required. The accesses and internal roads proposed for the construction of the substations are proposed to be permanent.

8.15. Details regarding the accesses are provided within the Outline Highways Access Management Plan (OHMAP). The location of the proposed accesses and their IDs are shown in Figures 1.1 and 1.2 of the OHAMP. A list of the accesses and a design summary is provided within Table 1.1 of the OHAMP. Drawings including the general arrangement, visibility splays and swept path analysis of the accesses are provided within Appendix A of the OHAMP.

8.16. The LHA's detailed review of the access proposals are based upon the general arrangement, visibility splays and swept path analysis drawings provided within Appendix A of the OHAMP. The LHA have reviewed the proposed accesses and their locations to identify whether the accesses proposed are safe and suitable.

8.17. The LHA's conclusions are based on observations regarding the following LHA criteria:

A. Suitable crossing provision proposed (based on likely additional traffic, having regard to good practice and guidance);
B. Adequate visibility presented and available;
C. Background OS appears accurate;
D. No Impact on Hedges & Trees;
E. Suitable radii and approach width proposed (based on expected vehicle size);
F. Adequate opportunity for signage;
G. Detail on how vehicles will be prevented from crossing the main carriageway;
H. Forms part of the proposed routing strategy;
I. Suitable acceleration/deceleration to/from access; and
J. Proposals for speed limit reductions are suitable and clear.

8.18. For each of the criteria (A to J above) provided below are more detailed descriptions of the review criteria, and this is followed by a table (Table 8.2), outlining any issues in relation to each access. Where the access satisfies the criteria, they have been indicated with a tick (✓) and where the access does not satisfy the criteria they have been marked with a cross (✗). Those criteria that do not apply to an access have been marked as not applicable (N/A).

A. Suitable of crossing provision proposed

8.19. In the location of each access, the existing pedestrian, cyclist and equestrian infrastructure and desire lines have been reviewed. In the case of an access that is proposed in a location where pedestrian, cyclist and equestrian infrastructure currently exists, it is expected that the access will provide suitable crossing provision across the access. Those locations where infrastructure currently does not exist, have been marked in the table as N/A.

B. Adequate visibility proposed

8.20. Visibility splay refers to the clear line of sight that allows a driver to see oncoming traffic from both directions at the proposed access. These splays at the junction are measured along the edge of the main road (the "Y" distance) from a point a set distance back from the edge of the main road (the "X" distance). It has been marked in the table where proposed accesses have adequate visibility or not, having regard to the nature and speed of the road (i.e., greater of the carriageway speed limits or the observed 85th percentile using 7 days of data), and their deliverability having regard to the existing environment (i.e. trees, shrubs, walls, buildings, vertical terrain etc.).

C. Background OS appears accurate

8.21. The LHA has reviewed the background OS map shown in the access drawing and marked in the table whether the background OS shown appears to be accurate or not. Incorrect OS mapping provides misleading information with regards to the suitability and safety of an access.

D. No Impact on Hedges & Trees

8.22. The LHA has considered how the access proposals may impact on existing trees or hedgerows in the verge. At a number of the proposed access locations, the required visibility has to utilise the full verge including sections of the existing hedgerow or tree line. This can be expected to have a detrimental impact on the vegetation. Again, accesses where a negative impact could be expected have been highlighted by a cross in the tables below. The construction of the accesses must be to an adoptable standard, and this is likely to require extensive excavation, potentially in a restricted space (possibly by hand) which may or will damage/remove roots of hedges/trees. The consequence of this damage may not be known for a number of years.

8.23. Hedges are often used to define land boundaries and from a farmer's perspective to protect land from prevailing weather conditions and contents such as livestock and crops. From a highway perspective, the maintaining of hedges (beyond the highway) and their cutting back is the responsibility of the landowner. The landowner has a responsibility for ensuring that it does not result in an obstruction impacting on safety.

8.24. The delivery of the proposed mitigation changes within the highway boundary will need to be delivered through a s.278 agreement. This does not give the

power to cut back hedges that are not owned by the highway authority. The statutory power that the highway authority has in this respect is found in s.154 of the Highways Act 1980 which states:

'154 Cutting or felling etc. trees etc. that overhang or are a danger to roads or footpaths.

(1) Where a hedge, tree or shrub overhangs a highway or any other road or footpath to which the public has access so as to endanger or obstruct the passage of vehicles or pedestrians, or obstructs or interferes with the view of drivers of vehicles or the light from a public lamp, or overhangs a highway so as to endanger or obstruct the passage of horse-riders, a competent authority may, by notice either to the owner of the hedge, tree or shrub or to the occupier of the land on which it is growing, require him within 14 days from the date of service of the notice so to lop or cut it as to remove the cause of the danger, obstruction or interference.

(2) Where it appears to a competent authority for any highway, or for any other road or footpath to which the public has access—

(a) that any hedge, tree or shrub is dead, diseased, damaged or insecurely rooted, and
(b) that by reason of its condition it, or part of it, is likely to cause danger by falling on the highway, road or footpath the authority may, by notice either to the owner of the hedge, tree or shrub or to the occupier of the land on which it is situated, require him within 14 days from the date of service of the notice so to cut or fell it as to remove the likelihood of danger.

(3) A person aggrieved by a requirement under subsection (1) or (2) above may appeal to a magistrates' court.

(4) Subject to any order made on appeal, if a person on whom a notice is served under subsection (1) or (2) above fails to comply with it within the period specified in those subsections, the authority who served the notice may carry out the work required by the notice and recover the expenses reasonably incurred by them in so doing from the person in default.'

8.25. For a s.154 notice to be used the criteria list above must be satisfied and the landowner can then be required to cut back any hedges of trees. In respect of any access that has to be delivered, regard must be had to vehicle safety so as not to place greater risk on the highway authority through claims, as a consequence of vehicle damage through the reduction of verges. It is reasonable to maintain existing verge widths, guidance such as TD 27/05 see LCC/1/7, highlights a 2.5m verge width (with a 1m hard strip). The historic lanes are significantly below this.

8.26. Regard must be had to the need to maintain hedges especially during the growing season. An agreement may have to be entered into to enable the recovery of the highway authority costs of any s.154 notices which will need to be sent to landowners on a regular basis and any consequential costs, if the landowner does not maintain the hedge, tree or shrub, to ensure the proposed road widths can be achieved and maintained including that required to satisfy any infrastructure such as signs or traffic lights.

E. Suitable radii and approach width proposed (based on expected vehicle size)

8.27. The proposed access junctions should have sufficient radii and approach width to accommodate the size of the expected vehicles. This would be informed by the routing strategy to/from the accesses and by Swept Path Analysis (SPA). The LHA has reviewed the proposed accesses with the proposed movements on the links (based on the limited information provided). Proposing large radii in locations where they are not required may promote movements of HGVs on routes that have not been assessed or proposed for use.

F. Adequate opportunity for signage

8.28. To raise awareness of the presence of proposed accesses, signage is critical. All signage will require adequate cover from the carriageway (it is typical for signage to be set back 450mm from the carriageway and posts to be passive) and must not impede visibility. The LHA has reviewed the available highway to identify if there is adequate opportunity for the delivery of signage and this is marked in Table 8.2 below.

G. Detail on how vehicles will be prevented from crossing main carriageway

8.29. Figures 1.1 and 1.2 of the OHAMP show the Highways Access Points in blue and the Haul Road Crossing Points in green. Haul road crossing points are proposed in pairs, opposite each other, and HGVs will cross the main carriageway to get from one access to the other, rather than routing to/from the access using the public highway. Therefore, large radii in and out of these accesses are not required. Figures 1.1 and 1.2 of the OHAMP highlight 16 crossing points.

8.30. It is the LHA's understanding that all other accesses (shown as Highways Access Points), that are located in front of each other, will not be crossing points, and HGVs will route to/from these accesses using the public highway. With this, it is important to ensure that the main carriageway, where two Highway Access Points are in front of each other, is not crossed by HGVs, and the accesses have been reviewed for detail on how vehicles will be prevented from crossing the main carriageway.

H. Forms part of routing strategy

8.31. It is expected that all proposed accesses form part of the routing strategy, and the LHA has reviewed this to ensure that this is the case.

I. Suitable acceleration/deceleration to/from access

8.32. Due to the low speeds that HGVs manoeuvre and accelerate at, on high-speed roads where left-in/left-out accesses are proposed, the provision of acceleration and deceleration lanes would minimise the level of conflict. The LHA has reviewed the accesses that this applies to and assessed whether suitable provision is proposed.

J. Proposals for speed limit reductions suitable and clear

8.33. Where speed limit reductions are proposed, the LHA has reviewed the proposals to ensure that the extent of the speed limit reductions are clear and suitable. Any proposed speed limit reductions need to be evidence based and must be self-enforcing with suitable provision (i.e., with the use of gateway treatment, signage, technology etc.). Otherwise, infrastructure may not positively influence driver behaviour of other vehicles travelling at higher speeds in either direction resulting in conflict/collisions.

8.34. It should be noted that Surface Water Flooding is not included in the Detailed Review of Proposed Access Table (Table 8.2). It is instead included in the Detailed Review of Proposed Routing Strategy (Table 8.4).

Table 8.2 - Detailed Review of Proposed Access Points

ACCESS	Access Location Classification (Urban, Suburban or Rural)	A. Suitable crossing provision proposed (based on likely additional traffic, having regard to good practice and guidance)	B. Adequate visibility presented and available	C. Background OS appears accurate	D. No Impact on Hedges & Trees	E. Suitable radii and approach width proposed (based on expected vehicle size)	F. Adequate opportunity for signage	G. Detail on how vehicles will be prevented from crossing the main carriageway	H. Forms part of the proposed routing strategy	I. Suitable acceleration/deceleration to/from access	J. Proposals for speed limit reductions are suitable and clear	**Is the access considered safe and suitable having regard to A - J**	General Notes and *column specific comments
A1	Urban	✓	N/A*	✓	✓	✗**	✓	N/A	✓	N/A	N/A	✗	* Existing Signalised Access. ** Narrow Carriageway not suitable for simultaneous 2-way HGV movements. It is unclear if HGVs will route to/from Link 17 (no swept paths provided for this movement), this movement may be unacceptable
A2	Urban	✗*	✓	✓	✓	✓	✓	N/A	✓	N/A	N/A	✗	* Walk distance across junction mouth is significant and not appropriate as presented
A3	Urban	✗*	✓	✗	✓	✓	✓	N/A	✓	N/A	N/A	✗	With increased used of this existing access, there is no detail on how sand/debris from the road towards the seafront will be prevented from coming on to the adopted highway * Walk distance across junction mouth is significant (not currently problem with low use of junction) and not appropriate as presented.
A4	Urban	✗	✗*	✓	✓	✗**	✓	N/A	✓	N/A	N/A	✗	Existing access is only suitable for current use. * Only one HGV able to use access for initial section, for which visibility is poor, and visibility issues at the end of the access. Visibility for all users crossing is poor (vulnerable users, users with prams etc). ** Swept path overruns footway
A5	Urban	✗	✗*	✗**	✗	✗***	✗	✗***	✓	N/A	N/A	✗	* Part of visibility splay is beyond the red line. ** Background OS appears to show footway that does not exist. *** Theoretically lane discipline can be achieved, however is very tortuous and will not be followed. Swept paths off Blackpool Road North not provided, but HGVs will route using Blackpool Road North.
A6	Urban	N/A	✓	✓	✓	✓	✓	N/A	✓	N/A	N/A	✓	
A7	Suburban	✓	✓	✓	✗	✓	✓	✗	✓	N/A	N/A	✓	Good signage needed to prevent rear end shunts
A8	Suburban	✓	✓	✓	✗	✓	✓	✗	✓	N/A	N/A	✓	Good signage needed to prevent rear end shunts
A9	Rural	✗	✗	✗	✗	✗	✗	N/A	✓	✗	✗	✗	Plans and detail on access not provided
A10	Rural	N/A	✗*	✗**	✗	✓	✗	✗	✗***	N/A	N/A	✗	* Visibility splay does not take into consideration trees/shrubs impacting visibility. ** Background OS shows inaccurate carriageway width. *** Table 7.21 of Volume 3 Chapter 7 indicates 0 HGVs on Link 30, yet large radii at the access proposed.

ACCESS	Access Location Classification (Urban, Suburban or Rural)	A. Suitable crossing provision proposed (based on likely additional traffic, having regard to good practice and guidance)	B. Adequate visibility presented and available	C. Background OS appears accurate	D. No Impact on Hedges & Trees	E. Suitable radii and approach width proposed (based on expected vehicle size)	F. Adequate opportunity for signage	G. Detail on how vehicles will be prevented from crossing the main carriageway	H. Forms part of the proposed routing strategy	I. Suitable acceleration/deceleration to/from access	J. Proposals for speed limit reductions are suitable and clear	**Is the access considered safe and suitable having regard to A - J**	General Notes and *column specific comments
A11	Rural	N/A	✗*	✗**	✗	✓	✗	✗	✗***	N/A	N/A	✗	* Visibility splay does not take into consideration trees/shrubs impacting visibility. ** Background OS shows inaccurate carriageway width. *** Table 7.21 of Volume 3 Chapter 7 indicates 0 HGVs on Link 30, yet large radii at the access proposed.
A12	Rural	N/A	✗*	✗	✗	✓	✗	✗	✗**	N/A	N/A	✗	* Visibility splay does not take into consideration trees/shrubs impacting visibility. ** Table 7.21 of Volume 3 Chapter 7 indicates 0 HGVs on Link 30, yet large radii at the access proposed.
A13	Rural	N/A	✗*	✗	✗	✓	✗	✗	✗**	N/A	N/A	✗	* Visibility splay does not take into consideration trees/shrubs impacting visibility. ** Table 7.21 of Volume 3 Chapter 7 indicates 0 HGVs on Link 30, yet large radii at the access proposed.
A14	Rural	N/A	✓	✓	✗	✓	✓	✗	✓	N/A	N/A	✗	
A15	Rural	N/A	✓	✓	✗	✓	✓	✗	✓	N/A	N/A	✗	
A16	Rural	N/A	✓*	✓**	✗	✓	✗***	N/A	✓****	N/A	N/A	✗	* One step below desirable minimum. ** Carriageway appears correct but verge incorrect. *** Insufficient footway to provide signing within highway. **** 0 HGVs proposed on Link 31b yet large radii to south.
A17	Rural	N/A	✗*	✓**	✗	✓	✓	✗	✓	N/A	N/A	✗	* Visibility splay does not take into consideration trees/shrubs impacting visibility. ** Only carriageway appears accurate.
A18	Rural	N/A	✗*	✓**	✗	✓	✓	✗	✓	N/A	N/A	✗	* Visibility splay does not take into consideration trees/shrubs impacting visibility. ** Only carriageway appears accurate.
A19	Rural	N/A	✓*	✓**	✗	✓	✗***	N/A	✓****	N/A	N/A	✗	* One step below desirable minimum. ** Carriageway appears correct but verge incorrect. *** insufficient footway to provide signing within highway. **** 0 HGVs proposed on Link 31b yet large radii to south.
A20	Rural	✗	✗	✗	✗	✗	✗	N/A	✓	✗	✗	✗	Plans and detail on access not provided
A21	Rural	N/A	✗*	✓	✗	N/A	✗	N/A**	N/A	N/A	✗***	✗	* Visibility shown according to proposed speed limit, for which there is a lack of detail and currently unacceptable, ** proposed crossing point, however, lack of detail on the prevention of HGVs crossing the main carriageway at high speeds. *** Vehicle speeds have been assumed but need to be evidence based. No detail provided.

ACCESS	Access Location Classification (Urban, Suburban or Rural)	A. Suitable crossing provision proposed (based on likely additional traffic, having regard to good practice and guidance)	B. Adequate visibility presented and available	C. Background OS appears accurate	D. No Impact on Hedges & Trees	E. Suitable radii and approach width proposed (based on expected vehicle size)	F. Adequate opportunity for signage	G. Detail on how vehicles will be prevented from crossing the main carriageway	H. Forms part of the proposed routing strategy	I. Suitable acceleration/deceleration to/from access	J. Proposals for speed limit reductions are suitable and clear	**Is the access considered safe and suitable having regard to A - J**	General Notes and *column specific comments
A22	Rural	N/A	✗*	✓	✗	N/A	✗	N/A**	N/A	N/A	✗***	✗	* Visibility shown according to proposed speed limit, for which there is a lack of detail and currently unacceptable, ** Proposed crossing point, however, lack of detail on the prevention of HGVs crossing the main carriageway at high speeds. *** Vehicle speeds have been assumed but need to be evidence based. No detail provided.
A23	Rural	N/A	✗*	✓	✗	N/A	✗	N/A**	N/A	N/A	✗***	✗	* Visibility shown according to proposed speed limit, for which there is a lack of detail and currently unacceptable. ** Proposed crossing point, however, lack of detail on the prevention of HGVs crossing the main carriageway at high speeds. *** Vehicle speeds have been assumed but need to be evidence based. No detail provided.
A24	Rural	N/A	✗*	✓	✗	N/A	✗	N/A**	N/A	N/A	✗***	✗	* Visibility shown according to proposed speed limit, for which there is a lack of detail and currently unacceptable. ** Proposed crossing point, however, lack of detail on the prevention of HGVs crossing the main carriageway at high speeds. *** Vehicle speeds have been assumed but need to be evidence based. No detail provided.
A25	Rural	N/A	✓*	✗	✗	✓	✗	✗	✗**	N/A	N/A	✗	* One step below desirable minimum. ** No HGVs proposed on Link 37 yet large radii to the south.
A26	Rural	✗*	✓**	✗	✗	✓	✗	✗	✗***	N/A	N/A	✗	* Removing existing sustainable provision without assessment of use or need is a retrograde step in sustainability, ** One step below desirable minimum *** No HGVs proposed on Link 37 yet large radii to the south.
A27	Rural	N/A	✓*	✗	✗	✓	✗	✗	✗**	N/A	N/A	✗	* One step below desirable minimum. ** No HGVs proposed on Link 37 yet large radii to the south. The LHA is currently assuming that vehicles are not crossing the main carriageway in this location. There is a safety issue with vehicles crossing the main carriageway.
A28	rural	✗*	✓**	✗	✗	✓	✗	✗	✗***	N/A	N/A	✗	* Removing existing sustainable provision without assessment of use or need is a retrograde step in sustainability. ** One step below desirable minimum. *** No HGVs proposed on Link 37 yet large radii to the south. The LHA is currently assuming that vehicles are not crossing the main carriageway in this location. There is a safety issue with vehicles crossing the main carriageway.

ACCESS	Access Location Classification (Urban, Suburban or Rural)	A. Suitable crossing provision proposed (based on likely additional traffic, having regard to good practice and guidance)	B. Adequate visibility presented and available	C. Background OS appears accurate	D. No Impact on Hedges & Trees	E. Suitable radii and approach width proposed (based on expected vehicle size)	F. Adequate opportunity for signage	G. Detail on how vehicles will be prevented from crossing the main carriageway	H. Forms part of the proposed routing strategy	I. Suitable acceleration/deceleration to/from access	J. Proposals for speed limit reductions are suitable and clear	**Is the access considered safe and suitable having regard to A - J**	General Notes and *column specific comments
A29	Rural	N/A	✗*	✓	✗	N/A	✗	N/A**	N/A	N/A	✗***	✗	This access is proposed off highway that is not adopted. * Visibility shown according to proposed speed limit, for which there is a lack of detail and currently unacceptable. ** Proposed crossing point, however, lack of detail on the prevention of HGVs crossing the main carriageway at high speeds. *** Vehicle speeds have been assumed but need to be evidence based. No detail provided.
A30	Rural	N/A	✗*	✓	✗	N/A	✗	N/A**	N/A	N/A	✗***	✗	This access is proposed off highway that is not adopted. * Visibility shown according to proposed speed limit, for which there is a lack of detail and currently unacceptable. ** Proposed crossing point, however, lack of detail on the prevention of HGVs crossing the main carriageway at high speeds. *** Vehicle speeds have been assumed but need to be evidence based. No detail provided.
A31	Rural	N/A	✗*	✓	✗	N/A	✗	N/A**	N/A	N/A	✗***	✗	This access is proposed off highway that is not adopted. * Visibility shown according to proposed speed limit, for which there is a lack of detail and currently unacceptable. ** Proposed crossing point, however, lack of detail on the prevention of HGVs crossing the main carriageway at high speeds. *** Vehicle speeds have been assumed but need to be evidence based. No detail provided.
A32	Rural	N/A	✗*	✓	✗	N/A	✗	N/A	N/A	N/A	✗***	✗	This access is proposed off highway that is not adopted. * Visibility shown according to proposed speed limit, for which there is a lack of detail and currently unacceptable. ** Proposed crossing point, however, lack of detail on the prevention of HGVs crossing the main carriageway at high speeds. *** Vehicle speeds have been assumed but need to be evidence based. No detail provided.

ACCESS	Access Location Classification (Urban, Suburban or Rural)	A. Suitable crossing provision proposed (based on likely additional traffic, having regard to good practice and guidance)	B. Adequate visibility presented and available	C. Background OS appears accurate	D. No Impact on Hedges & Trees	E. Suitable radii and approach width proposed (based on expected vehicle size)	F. Adequate opportunity for signage	G. Detail on how vehicles will be prevented from crossing the main carriageway	H. Forms part of the proposed routing strategy	I. Suitable acceleration/deceleration to/from access	J. Proposals for speed limit reductions are suitable and clear	**Is the access considered safe and suitable having regard to A - J**	General Notes and *column specific comments
A33	Rural	N/A	✗*	✗**	✗	✗***	✗	N/A	✗	N/A	✗****	✗	The access does not form part of routing strategy. * Visibility shown according to proposed speed limit, for which there is a lack of detail and currently unacceptable. ** Unclear. *** Very theoretical swept paths provided. No factor of safety between the swept paths and they are unlikely to be followed in reality. The manoeuvring of HGVs will be at very slow speeds with scrubbing (of carriageway) at the junction. **** Vehicle speeds have been assumed but need to be evidence based. No detail provided.
A34	Rural	N/A	✗*	✓	✗	✗**	✓	✗	✗***	N/A	✗****	✗	* Visibility shown according to proposed speed limit, for which there is a lack of detail and currently unacceptable. ** movement makes use of the full section of narrow mainline carriageway. *** 0 HGVs proposed on link 47 yet large radii to the south. **** No detail provided.
A35	Rural	N/A	✗*	✓	✗	✗**	✓	✗	✗***	N/A	✗****	✗	* Visibility shown according to proposed speed limit, for which there is a lack of detail and currently unacceptable. ** movement makes use of the full section of narrow mainline carriageway. *** 0 HGVs proposed on link 47 yet large radii to the south. **** No detail provided.
A36	Rural	N/A	✗*	✓	✗	✗**	✓	✗	✗***	N/A	✗****	✗	* Visibility shown according to proposed speed limit, for which there is a lack of detail and currently unacceptable. ** movement makes use of the full section of narrow mainline carriageway. *** 0 HGVs proposed on link 47 yet large radii to the south. **** No detail provided.
A37	Rural	N/A	✗*	✓	✗	✗**	✓	✗	✗***	N/A	✗****	✗	* Visibility shown according to proposed speed limit, for which there is a lack of detail and currently unacceptable. ** movement makes use of the full section of narrow mainline carriageway. *** 0 HGVs proposed on link 47 yet large radii to the south. **** No detail provided.
A38	Rural	N/A	✗*	✓	✗	N/A	✗	N/A**	N/A	N/A	✗***	✗	* Visibility shown according to proposed speed limit, for which there is a lack of detail and currently unacceptable. Visibility splay does not take into consideration trees/shrubs impacting visibility. ** Proposed crossing point, however, lack of detail on the prevention of HGVs crossing the main carriageway at high speeds. *** Vehicle speeds have been assumed but need to be evidence based. No detail provided.

ACCESS	Access Location Classification (Urban, Suburban or Rural)	A. Suitable crossing provision proposed (based on likely additional traffic, having regard to good practice and guidance)	B. Adequate visibility presented and available	C. Background OS appears accurate	D. No Impact on Hedges & Trees	E. Suitable radii and approach width proposed (based on expected vehicle size)	F. Adequate opportunity for signage	G. Detail on how vehicles will be prevented from crossing the main carriageway	H. Forms part of the proposed routing strategy	I. Suitable acceleration/deceleration to/from access	J. Proposals for speed limit reductions are suitable and clear	**Is the access considered safe and suitable having regard to A - J**	General Notes and *column specific comments
A39	Rural	N/A	✗*	✓	✗	N/A	✗	N/A**	N/A	N/A	✗***	✗	* Visibility shown according to proposed speed limit, for which there is a lack of detail and currently unacceptable. Visibility splay does not take into consideration trees/shrubs impacting visibility. ** Proposed crossing point, however, lack of detail on the prevention of HGVs crossing the main carriageway at high speeds. *** Vehicle speeds have been assumed but need to be evidence based. No detail provided.
A40	Rural	N/A	✗*	✓	✗	N/A	✗	N/A**	N/A	N/A	✗***	✗	* Visibility shown according to proposed speed limit, for which there is a lack of detail and currently unacceptable. Visibility splay does not take in to consideration trees/shrubs impacting visibility. ** Proposed crossing point, however, lack of detail on the prevention of HGVs crossing the main carriageway at high speeds. *** Vehicle speeds have been assumed but need to be evidence based. No detail provided.
A41	Rural	N/A	✗*	✓	✗	N/A	✗	N/A**	N/A	N/A	✗***	✗	* Visibility shown according to proposed speed limit, for which there is a lack of detail and currently unacceptable. Visibility splay does not take in to consideration trees/shrubs impacting visibility. ** Proposed crossing point, however, lack of detail on the prevention of HGVs crossing the main carriageway at high speeds. *** Vehicle speeds have been assumed but need to be evidence based. No detail provided.
A42	Rural	✗*	✓	✓	✓	✗**	✓	✗	✓**	N/A	N/A	✗	*As an example, crossing distance across the access is circa 60m ** 0 HGVs proposed on link 54 yet large radii to the south.
A43	Rural	N/A	✓	✓	✗	✗*	✓	✗	✓*	N/A	N/A	✗	* 0 HGVs proposed on route 54 to the south yet large radii proposed. Issue with surface water flooding at access.
A44	Rural	N/A	✗*	✓	✗	N/A	✗	N/A**	N/A	N/A	✗***	✗	* Visibility shown according to proposed speed limit, for which there is a lack of detail and currently unacceptable. Visibility splay does not take into consideration trees/shrubs impacting visibility. ** Proposed crossing point, however, lack of detail on the prevention of HGVs crossing the main carriageway at high speeds. *** vehicle speeds have been assumed but need to be evidence based. No detail provided.

ACCESS	Access Location Classification (Urban, Suburban or Rural)	A. Suitable crossing provision proposed (based on likely additional traffic, having regard to good practice and guidance)	B. Adequate visibility presented and available	C. Background OS appears accurate	D. No Impact on Hedges & Trees	E. Suitable radii and approach width proposed (based on expected vehicle size)	F. Adequate opportunity for signage	G. Detail on how vehicles will be prevented from crossing the main carriageway	H. Forms part of the proposed routing strategy	I. Suitable acceleration/deceleration to/from access	J. Proposals for speed limit reductions are suitable and clear	**Is the access considered safe and suitable having regard to A - J**	General Notes and *column specific comments
A45	Rural	N/A	✗*	✓	✗	N/A	✗	N/A**	N/A	N/A	✗***	✗	* Visibility shown according to proposed speed limit, for which there is a lack of detail and currently unacceptable. Visibility splay does not take into consideration trees/shrubs impacting visibility. ** Proposed crossing point, however, lack of detail on the prevention of HGVs crossing the main carriageway at high speeds. *** vehicle speeds have been assumed but need to be evidence based. No detail provided.
A46	Rural	N/A	✗*	✓	✗	N/A	✗	N/A**	N/A	N/A	✗***	✗	* Visibility shown according to proposed speed limit, for which there is a lack of detail and currently unacceptable. Visibility splay does not take into consideration trees/shrubs impacting visibility. ** Proposed crossing point, however, lack of detail on the prevention of HGVs crossing the main carriageway at high speeds. *** Vehicle speeds have been assumed but need to be evidence based. No detail provided.
A47	Rural	N/A	✗*	✓	✗ 50	N/A	✗	N/A**	N/A	N/A	✗***	✗	* Visibility shown according to proposed speed limit, for which there is a lack of detail and currently unacceptable. Visibility splay does not take into consideration trees/shrubs impacting visibility. ** Proposed crossing point, however, lack of detail on the prevention of HGVs crossing the main carriageway at high speeds. *** Vehicle speeds have been assumed but need to be evidence based. No detail provided.
A48	Rural	N/A	✗*	✓	✗	✓	✓	N/A	✓**	✗	N/A	✗	There is no justification to the proposed removal of the existing layby that is used. * Speed surveys are required in this location. X-distance for the visibility splay should be 4.5m. Visibility splay does not take into consideration trees/shrubs impacting visibility. ** No detail has been provided on where vehicles will U-turn and the suitability and safety of the location. No detail is provided on the of exit of AIL from the access.
A49	Rural	N/A	✗*	✓	✗	✓	✓	N/A	✓**	✗	N/A	✗	* Speed surveys are required in this location. X-distance for the visibility splay should be 4.5m. Visibility splay does not take into consideration tree and bus shelter impacting visibility. ** No detail has been provided on where vehicles will U-turn and the suitability and safety of the location.

ACCESS	Access Location Classification (Urban, Suburban or Rural)	A. Suitable crossing provision proposed (based on likely additional traffic, having regard to good practice and guidance)	B. Adequate visibility presented and available	C. Background OS appears accurate	D. No Impact on Hedges & Trees	E. Suitable radii and approach width proposed (based on expected vehicle size)	F. Adequate opportunity for signage	G. Detail on how vehicles will be prevented from crossing the main carriageway	H. Forms part of the proposed routing strategy	I. Suitable acceleration/deceleration to/from access	J. Proposals for speed limit reductions are suitable and clear	**Is the access considered safe and suitable having regard to A - J**	General Notes and *column specific comments
A50	Rural	✗*	✗**	✓	✗	✓	✓	N/A	✓***	✗	N/A	✗	* The proposed tactile paving is located within verge. Users would have to look behind themselves before crossing. ** Speed surveys are required in this location. X-distance for the visibility splay should be 4.5m. *** No detail has been provided on where vehicles will U-turn and the suitability and safety of the location.
A51	Rural	N/A	✗*	✓	✗	✓	✓	N/A	✓**	✗	N/A	✗	* It is unclear if the 85th percentile of the observed speeds has been used. X-distance for the visibility splay should be 4.5m. ** No detail has been provided on where vehicles will U-turn and the suitability and safety of the location.
A52	Rural	✗*	✗**	✓	✗	✓	✓	✗	✓***	✗	N/A	✗	* The proposed tactile paving is located within verge. Users would have to look behind themselves before crossing. ** Speed surveys are required in this location. X-distance for the visibility splay should be 4.5m. *** No detail has been provided on where vehicles will U-turn and the suitability and safety of the location.
A53	Rural	N/A	✗*	✓	✗	✓	✓	✗	✓**	✗	N/A	✗	* Speed surveys are required in this location. X-distance for the visibility splay should be 4.5m. ** No detail has been provided on where vehicles will U-turn and the suitability and safety of the location.
A54	Not Used												
A55	Rural	✓	✓	✓	✗	✗*	✓	N/A	✓*	N/A	N/A	✗	** Routing strategy does not continue to the north, yet large radii proposed.
A56	Rural	✓	✗*	✓	✗	✓	✓	N/A	✓**	✗***	N/A	✗	* Speed surveys are required in this location. X-distance for the visibility splay should be 4.5m. ** No detail has been provided on where vehicles will U-turn and the suitability and safety of the location. *** As proposed, there is a weaving issue due to possible lane changes in the vicinity of the proposed access.
A57	Rural	✗*	✗**	✓	✗	✗***	✓	N/A	✓****	N/A	N/A	✗	* This route forms part of the well-used defined cycleway (Guild Wheel), and there is a lack of detail on how other users will be managed. ** X-distance for the visibility splay should be 4.5m. *** Swept path shows vehicle exceeding carriageway in locations. There is no detail on how the existing number of vehicle restriction and weight restriction of the bridge will be managed. **** No detail has been provided on where vehicles will U-turn and the suitability and safety of the location.

ACCESS	Access Location Classification (Urban, Suburban or Rural)	A. Suitable crossing provision proposed (based on likely additional traffic, having regard to good practice and guidance)	B. Adequate visibility presented and available	C. Background OS appears accurate	D. No Impact on Hedges & Trees	E. Suitable radii and approach width proposed (based on expected vehicle size)	F. Adequate opportunity for signage	G. Detail on how vehicles will be prevented from crossing the main carriageway	H. Forms part of the proposed routing strategy	I. Suitable acceleration/deceleration to/from access	J. Proposals for speed limit reductions are suitable and clear	**Is the access considered safe and suitable having regard to A - J**	General Notes and *column specific comments
A58	Leisure (spine road)	✗*	✓	✓	✓	✓*	N/A**	N/A	✓	N/A	N/A	✗	Not adopted highway, access to rights need to be confirmed by landowner to use this leisure spine road. *Existing cycle lane needs to be crossed by HGVs. The swept paths make use of full section of cycleway. Large numbers of HGVs proposed. ** Beyond the highway.
A59	Rural	N/A	✗*	✓	✗	✗**	✗	N/A	✓	N/A	N/A	✗	* Part of visibility splay is beyond the red line and splays do not take in to consideration shrubs and wall impacting visibility. ** Access requires full use of carriageway by a single HGV. No detail on how other movements will be managed.
A60	Rural	N/A	✗*	✓	✗	✗**	✓	N/A	✓	N/A	N/A	✗	* Visibility splay does not take into consideration trees/shrubs impacting visibility. ** Access requires full use of carriageway by a single HGV. No detail on how other movements will be managed.
A61	Rural	N/A	✓	✗	✓	✗*	✓	N/A	✓	N/A	N/A	✗	* Swept Paths on inaccurate background OS suggests two HGVs will be able to use Howick Cross Lane simultaneously. This is incorrect, as the carriageway is circa 5m in this location (less than the width of 2 HGVs).
A62	Rural	✗*	✓	✗*	✗	✓	✓	N/A	✓**	N/A	N/A	✗	* Footway, cycleway and verge shown incorrectly, and therefore crossing provision shown is incorrect. ** No detail has been provided on where vehicles will U-turn and the suitability and safety of the location.
A63	Urban	✓	✓	✓	✓	✗*	✓	N/A	✓	N/A	N/A	✗	* Access requires use of most of carriageway by a single HGV. No detail on how other movements and HGVs will be managed.
A01	Rural	N/A	✗*	✓	✗	✓	✓	N/A	✓**	✗***	N/A	✗	* Speed surveys are required in this location. X-distance for the visibility splay should be 4.5m. ** No detail has been provided on where vehicles will U-turn and the suitability and safety of the location. *** Due to the low speeds that HGVs manoeuvre at, on high-speed roads, it is expected that for this proposed permanent access regard would be had to how this will be safely managed, reducing conflict. No provision proposed for this manoeuvre, or any justification for not providing.

A02	ACCESS
Rural	Access Location Classification (Urban, Suburban or Rural)
N/A	A. Suitable crossing provision proposed (based on likely additional traffic, having regard to good practice and guidance)
X*	B. Adequate visibility presented and available
✓	C. Background OS appears accurate
X	D. No Impact on Hedges & Trees
X**	E. Suitable radii and approach width proposed (based on expected vehicle size)
✓	F. Adequate opportunity for signage
N/A	G. Detail on how vehicles will be prevented from crossing the main carriageway
X	H. Forms part of the proposed routing strategy
N/A	I. Suitable acceleration/deceleration to/from access
X	J. Proposals for speed limit reductions are suitable and clear
X	**Is the access considered safe and suitable having regard to A - J**
* Visibility shown according to an assumed speed limit. There are no proposals to reduce the speed limit in the location. Visibility Splay is well below standards and guidance and poses a safety issue of significance. ** Access requires full use of carriageway by a single HGV. No detail on how other movements will be managed. It is unclear if this access will be used during the project construction and does not form part of routing strategy	General Notes and *column specific comments

Summary of Proposed Accesses Review

8.35. Of the 64 accesses shown in table 8.2 above, 61 are currently unacceptable to the LHA as presented. A summary of the LHA's concerns highlighted in Table 8.2, is provided below.

8.36. At accesses where footways and cycleways currently exist, there are a number of new accesses that do not propose suitable crossing infrastructure across the access or that do not provide suitable crossing infrastructure. There are many locations that require pedestrians to cross large distances across junction mouths. The LHA is concerned that no data has been collected to provide a clear understanding of pedestrian, cycle or equestrian movements or the impacts on these users (including cycle clubs and stables etc.). Those locations that make use of shared pedestrian/cycleway, risks and conflict with sustainable users need to be managed, and this has yet to be provided.

8.37. The removal of a footway is a significant concern of the LHA and will not be supported (e.g. at Accesses A26 and A28). Removal of a footway is a retrograde step for sustainable users. In addition, the construction of a footway is not the same as the construction of a carriageway, with the area of footway susceptible to poor ground conditions that requires preloading.

8.38. There are also significant issues related to visibility at accesses, where visibility splays need to be set back further (in line with the DMRB i.e., an increase from 2.4m to 4.5m) due to the type of the road. There are locations where visibility splays exceed the red line boundary of the application site or where visibility splays are unlikely to be achieved due to existing trees hedges and shrubs, that have not been taken into consideration. There are a number of locations where significant amounts of hedgerow will require to be removed in order to achieve visibility splays at accesses. There are additional implications here in terms of landscape impacts and also potentially biodiversity especially if the works required removal of trees including those with bat potential.

8.39. There are accesses that include large radii in both directions, which do not align with the routing strategy (i.e., 0 HGVs are proposed from the proceeding route to the access, yet large radii are proposed in that direction); this will promote movements of large vehicles on routes that have not been assessed or permitted for use.

8.40. Due to the low speeds that HGVs manoeuvre/accelerate at, on high-speed roads where left-in/left-out accesses are proposed, there may be benefit in providing acceleration and deceleration lanes, without which a level of conflict is created. The slow movements of HGVs in to and out of the sites located off high-speed roads have not been considered.

8.41. Where there is a break in the central reservation on high-speed roads (e.g. Access A48), to allow existing infrequent vehicles to turn right, this movement would not be permitted for any vehicle associated with the project. There do not appear to be hard-engineered solutions to prevent these movements from occurring.

8.42. For left-in/left-out accesses, the requirement for u-turning vehicles or routeing for them is not clear. Swept path analysis of u-turning HGVs at roundabouts have not been provided. A full review of the consequences of u-turners, including on other drivers is required. Currently, the u-turning movement of HGVs at the roundabouts will be infrequent, and users of the highway would not be expecting this movement. There do not appear to be any proposals to overcome this.

8.43. Current usage of existing laybys that are proposed to be removed (e.g. Access A48), need to be assessed, with suitable alternative locations provided. The LHA has been unable to locate the provision of any alternative locations.

8.44. Existing road markings are not incorporated into the proposed accesses and will cause confusion for drivers. There are safety concerns with lane changes in the vicinity of access no. A56.

8.45. Where two access are proposed in front of each other, there is no detail on how vehicles will be prevented from crossing the main carriageway. There are locations where proposed HGV numbers on routes suggest HGVs only using the access from one direction, but radii for HGVs are provided for both directions of the access. In some cases, routes are suggested to have 0 HGV movements, but large radii are proposed from the accesses (e.g. Accesses A10, A11, A12 and A13).

8.46. At some proposed crossing point accesses, the adopted highway is lightly trafficked. There do not appear to have been any consideration of how to prevent HGVs crossing the adopted highway without appropriately slowing down, having regard to the highway which is being crossed, which is a significant safety concern. At locations where haul roads cross the existing highway, there is a concern regarding its operation as limited provision is proposed that would suggest that that proposed crossing is safe to both highway users and haul road users.

8.47. Where speed limit reductions are proposed, there is a lack of detail about speed limits, an evidence base for their proposal or details about how the speed limit reductions will be achieved. Without this, the driver behaviour of other vehicles travelling at higher speeds in either direction is likely to result in conflict/collisions. This is a significant concern.

8.48. Enforcement of the proposed speed limits may be problematic due to the number of resources required to provide a regular presence in remote locations. While the applicant and their contractor could put in place extensive measures to control the construction site traffic, they need to demonstrate how the proposed speed limits will be self-enforcing. Simply signing a route with a reduced speed limit will not achieve the desired outcome. This is particularly important when considering the highway in the vicinity of the proposed construction accesses.

8.49. It must be noted that speed limit reductions will require the implementation of Traffic Regulation Orders (TROs) or Temporary Traffic Regulation Orders (TTROs). These are dependent on the success of TRO applications. This is a significant risk to the project as this does not form part of the planning process. Following successful implementation of a TRO, enforcement is subject to Lancashire Constabulary's support.

8.50. Schedule 6 of the Draft Development Consent Order (DCO) lists accesses for which the DCO seeks authorisation to *"form and lay out means of access, or improve or maintain existing means of access for the purposes of the authorised project"*. The accesses listed in Schedule 6 are shown on the Access to Works Plan. There are a large number of accesses that are included in Schedule 6 of the DCO but are not included in the OHAMP, and no detail including the suitability of the accesses has been provided. Until further information is provided to the satisfaction of the LHA, these accesses are unacceptable to the LHA, and a significant concern from an operational and safety perspective. These accesses are listed below:

- OAR_MGMC_3
- TAT_FT_MGMC_2
- OAR_MGMC_8
- OAR_MGMC_9
- OAR_MGMC_10
- OAR_MGMC_12
- OAR_MGMC_15
- OAR_MGMC_14
- OAR_ECO_MGMC_1
- TAT_ECO_MGMC_1
- OAR_ECO_MGMC_2
- OAR_MGMC_16
- OAR_MGMC_17
- OAR_MGMC_19
- OAR_MGMC_21
- OAR_MGMC_24
- OAR_MGMC_27
- OAR_MGMC_28
- OAR_MGMC_29
- OAR_MGMC_30
- OAR_MGMC_31
- OAR_MGMC_34
- OAR_MGMC_36
- TAT_ECO_MG_3
- OAR_ECO_MG_4
- OAR_MG_35
- OAR_MGMC_37
- OAR_MGMC_38
- LSS_MC_02
- OAR_MGMC_39
- OAR_MGMC_40
- OAR_ECO_MGMC_5
- OAR_MGMC_41
- TAT_ECO_MGMC_4
- TAT_ECO_MGMC_5
- OAR_MGMC_42
- OAR_ECO_MGMC_6
- OAR_MGMC_43
- OAR_MGMC_44
- OAR_MGMC_45
- OAR_MGMC_46
- OAR_MGMC_47
- OAR_MGMC_48
- TAT_ECO_MGMC_6
- OAR_ECO_MGMC_7
- OAR_MGMC_49
- OAR_MGMC_50
- OAR_MGMC_51
- OAR_MGMC_52
- OAR_MGMC_53
- OAR_MGMC_54

8.51. The above section provides only a summary of the issues identified in Table 8.2. There are a significant number of outstanding concerns and issues or

matters in relation to which further information is currently required in relation to the proposed accesses. It is the LHA's view that these concerns must be suitably addressed at this stage, prior to any DCO being granted.

Routing Strategy

8.52. Figure 7.1 (Environmental Statement Volume 3) shows the highway links that form part of the study area and routeing strategy. The links are assigned IDs on Figure 7.1.

8.53. Routeing to each access is not clear and has to be assumed from that presented, i.e. using Table 7.21 of Traffic and Transport (Vol 3, Chapter 7 of the Environmental Statement), which highlights the proposed number of daily total vehicles and heavy vehicles on each link. The LHA has considered the number of vehicles on the links either side of the access and assumed the difference in numbers between these links to be the number of vehicles using that access.

8.54. As with the detailed review of the proposed accesses, the LHA has reviewed the proposed routes to be used to identify whether they are safe and suitable for use by HGVs.

8.55. The LHA's conclusions are based on observations regarding the following LHA criteria:

A. Approximate width of the existing (usable) carriageway (excluding parking bays and cycleways) (taken from Mapping software);
B. 2027 Base daily HGV flows (taken from Table 7.21 of ES Volume 3, Chapter 7);
C. Peak daily construction HGV flows (taken from Table 7.21 of ES Volume 3, Chapter 7);
D. Simultaneous 2-way HGV movement can be accommodated on the link
E. Swept Path Analysis provided for the route;
F. Pedestrian, cyclists and equestrian demand identified;
G. Overrun does not occur;
H. Sufficient waiting areas along the route; and
I. Link not susceptible to surface water flooding.

8.56. For each of the criteria (A to I listed above) more detailed descriptions of the review criteria, are provided below. This is followed by a table (Table 8.4), outlining any issues in relation to each route. Where the route satisfies the criteria, they have been indicated with a tick (✓) and where the route does not satisfy the criteria they have been marked with a cross (✗). Those criteria that do not apply to a route have been marked as not applicable (N/A).

A. Approximate width of the existing (usable) carriageway (excluding parking bays and cycleways) (taken from Mapping software)

8.57. Within this column of Table 8.4, the LHA has provided an approximate width of available usable carriageway on the route, that excludes parking bays and cycleways. The measurement has been taken from mapping software.

B. 2027 Base daily HGV flows (taken from Table 7.21 of Environmental Statement Volume 3, Chapter 7)

8.58. The 2027 base condition daily HGV flows are presented in this column of Table 8.4, which have been taken from Table 7.21 of Environmental Statement Volume 3, Chapter 7.

C. Peak daily construction HGV flows (taken from Table 7.21 of ES Volume 3, Chapter 7)

8.59. The peak daily construction HGV flows are presented in this column of Tabel 8.4 which have been taken from Table 7.21 of Environmental Statement Volume 3, Chapter 7.

D. Simultaneous 2-way HGV movement can be accommodated

8.60. The LHA has reviewed the routes to identify if 2-way HGV movements can be accommodated on the route. To assist, the following table, Table 8.3 includes examples of vehicle widths for typical vehicles that use the roads.

Table 8.3 – Typical Vehicle Widths

Vehicle type	**Body Width, no wing mirrors**	**Total width of vehicle**
Commercial vehicle (including tractors)	2.50m	3.00m
Van	2.00m	2.40m
Range Rover	2.07m	2.22m
Ford Fiesta	1.72m	1.97m
Bicycle (single file)	distance from kerb/verge 0.75m distance from cyclist to vehicle 1.5m	2.25m (kerb/verge to overtaking vehicle)

Note: the above table excludes tolerance between vehicles (in each direction)

E. Swept Path Analysis provided for the route

8.61. With large infrastructure projects that expect high levels of HGV movements, on constrained roads, it is necessary to provide Swept Path Analysis using HGVs to identify pinch points or constraints on the routes. The LHA has reviewed whether these swept paths have been provided.

F. Pedestrian, cyclists and equestrian demand identified

8.62. It is important that the demand of sustainable users on the routes are identified to ensure that the proposals are safe and sustainable for users. The LHA has reviewed the simple information that has been provided (that is limited and insufficient, as highlighted previously).

G. Overrun does not occur

8.63. Frequent overrun of the carriageway on roads can lead to carriageway erosion or damage to kerbing. This is common when two large vehicles cannot pass each other without overrunning the verge/footway. The LHA has reviewed the proposed routes to identify if overrun on the highway currently occurs, and that would be exacerbated by the construction of the project. No regard has been had to location of highway infrastructure such as signage and lighting.

H. Sufficient waiting areas along the route

8.64. For routes that are narrow and unable to accommodate HGVs (or HGVs and agricultural vehicles) in opposing directions, it is expected that waiting areas will be used/proposed at suitable locations as mitigation. The LHA has reviewed the routes to identify if suitable waiting areas have been identified/proposed by the application.

I. Link not susceptible to surface water flooding

8.65. The LHA has reviewed LCC mapping software to identify if the routes proposed to be used are susceptible to surface water flooding.

Table 8.4 - Detailed Review of Proposed Routing Strategy

ROUTE (LINK ID)	A. Approximate width of the existing (usable) carriageway (excluding parking bays and cycleways) (taken from Mapping software)	B. 2027 Base daily HGV flows (taken from Table 7.21 of ES Volume 3, Chapter 7)	C. Peak daily construction HGV flows (taken from Table 7.21 of ES Volume 3, Chapter 7)	D. Simultaneous 2-way HGV movement can be accommodated on the link	E. Swept Path Analysis provided for the route	F. Pedestrian, cyclists and equestrian demand identified	G. Overrun does not occur	H. Sufficient waiting areas along the route	I. Link not susceptible to Surface Water Flooding	**Is the route considered suitable for HGVs, having regard to A - I**	General Notes and *column specific comments
Link 1	8.6 - 10m	132	0	Not proposed to be used by HGVs					✗	**N/A**	
Link 2	3.6m (1way)	151	0	Not proposed to be used by HGVs					✗	**N/A**	
Link 3	9 - 10m	57	0	Not proposed to be used by HGVs					✗	**N/A**	
Link 4	11.5m	32	0	Not proposed to be used by HGVs					✓	**N/A**	
Link 5	8.5m	86	0	Not proposed to be used by HGVs					✓	**N/A**	
Link 6	10 - 11.5m	184	0	Not proposed to be used by HGVs					✗	**N/A**	
Link 7	>15m	519	0	Not proposed to be used by HGVs					✗	**N/A**	
Link 8	Not Used									**N/A**	
Link 9	10.8m	381	47	✓	N/A	✗	✓	N/A	✓	✓	
Link 10	7.8m*	0	0	Not proposed to be used by HGVs					✗	**N/A**	* On-street parking reduces carriageway to 3.6m.
Link 11	>15m	284	47	✓	N/A	✗	✓	N/A	✗	✓	
Link 12	6.8m	826	0	Not proposed to be used by HGVs						**N/A**	
Link 13	>15m	533	47	✓	N/A	✗	✓	N/A	✗	✓	
Link 14	>15m	1060	198	✓	N/A	✗	✓	N/A	✗	✓	
Link 15	Not Used									**N/A**	
Link 16	>15m	1229	198	✓	N/A	✗	✓	N/A	✓	✓	
Link 17	8 - 10m	245	47	✓	N/A	✗	✓	N/A	✗	✓	
Link 18	7.9m	32	0	Not proposed to be used by HGVs						**N/A**	
Link 19	8.8 - 9.2m	101	0	Not proposed to be used by HGVs						**N/A**	
Link 20a	6.8-7.1m	196	186	✓	N/A	✗	✓	N/A	✗	✓*	* May require restrictions due to capacity issues during peaks. Blackpool EZ significant highway works may influence suitability of route whilst works are ongoing.
Link 20b	6.8-7.1m	196	107	✓	N/A	✗	✓	N/A	✓	✓*	* Significant highway works (yet to commence) at the Kilnhouse Lane junction may influence suitability of route whilst works are ongoing (linked to works associated to development currently being built out).
Link 21	Not Used									**N/A**	
Link 22a	7.1 - 7.8m	171	107	✓	N/A	✗	✓	N/A	✗	✓	
Link 22b	7.3*	6	107	✗**	N/A	✗	✓	✗	✗	✗	* On-street parking reduces carriageway to 4.3m. ** Need to have restrictions in place to support safe waiting areas (Public Transport also uses the corridor).
Link 23	7 - 7.2m	300	0	Not proposed to be used by HGVs						**N/A**	
Link 24	7.2 - 8.2m	162	0	Not proposed to be used by HGVs						**N/A**	
Link 25	7.3m	82	0	Not proposed to be used by HGVs						**N/A**	
Link 26	7.2 - 7.5m	82	21	✓	N/A	✗	✓	N/A	✗	✓	
Link 27	Not Used									**N/A**	
Link 28	7.2 - 7.5m	129	21	✓	N/A	✗	✓	N/A	✗	✓	
Link 29	>15m	323	55	✓	N/A	✗	✓	N/A	✓	✓	
Link 30	5.5 - 6m	10	0	✗	✗*	✗	✗**	N/A***	✗	✗	Accesses 10, 11, 12 and 13 proposed off this link, yet 0 HGVs suggested. * OS layer for access drawings off this link is inaccurate. ** Some limited lengths of overrun. *** Cannot be defined until SPA provided.
Link 31a	5.5 - 6m	11	38	✗	✗	✗	✗*	N/A**	✓	✗	* Some limited lengths of overrun ** Cannot be defined until SPA provided.
Link 31b	5.7m*	11	0	Not proposed to be used by HGVs						**N/A**	* On-street parking on Park View Road reduces carriageway to 4.3m.
Link 32	Not Used									**N/A**	

ROUTE (LINK ID)	A. Approximate width of the existing (usable) carriageway (excluding parking bays and cycleways) (taken from Mapping software)	B. 2027 Base daily HGV flows (taken from Table 7.21 of ES Volume 3, Chapter 7)	C. Peak daily construction HGV flows (taken from Table 7.21 of ES Volume 3, Chapter 7)	D. Simultaneous 2-way HGV movement can be accommodated on the link	E. Swept Path Analysis provided for the route	F. Pedestrian, cyclists and equestrian demand identified	G. Overrun does not occur	H. Sufficient waiting areas along the route	I. Link not susceptible to Surface Water Flooding	**Is the route considered suitable for HGVs, having regard to A - I**	General Notes and *column specific comments
Link 33	Not Used									**N/A**	
Link 34	Not Used									**N/A**	
Link 35	Not Used									**N/A**	
Link 36	Not Used									**N/A**	
Link 37	5.5 - 9.1m	64	0	Not proposed to be used by HGVs						**N/A**	
Link 38	Not Used								✓	**N/A**	
Link 39a	5 - 6.5m	63	23	✗	✗	✗	✓	N/A*	✗	✗	* Cannot be defined until SPA provided.
Link 39b	5 - 5.5m	63	13	✗	✗	✗	✗*	N/A**	✓	✗	* Some limited lengths of overrun. ** Cannot be defined until SPA provided.
Link 40	Not Used									**N/A**	
Link 41	5 - 6.5m	16	105	✗	✗	✗	✗*	N/A**	✓	✗	* Some limited lengths of overrun. ** Cannot be defined until SPA provided.
Link 42	9.3 - 10m	156	34	✓	✗	✗	✓	N/A	✓	✗	
Link 43a	5.3 - 6.3m	56	172	✗	✗	✗	✗*	N/A**	✓	✗	* Some limited lengths of overrun. ** Cannot be defined until SPA provided.
Link 43b	5.3 - 6.3m	56	108	✗	✗	✗	✗*	N/A**	✗	✗	* Some limited lengths of overrun. ** Cannot be defined until SPA provided.
Link 44	Not Used									**N/A**	
Link 45	5.3 - 6m*	90	0	Not proposed to be used by HGVs						**N/A**	* On-street parking reduces CW to 4m.
Link 46	4.7 - 6.3m	107	110	✗	✗	✗	✗	N/A*	✗	✗	* Cannot be defined until SPA provided.
Link 47	5.5 - 8m	101	0	Not proposed to be used by HGVs						**N/A**	
Link 48	Not Used									**N/A**	
Link 49	7 -9m	302	0	Not proposed to be used by HGVs						**N/A**	
Link 50	9- 9.3m	304	143	✓	✗	✗	✓	N/A	✗	✓	
Link 51	7 - 7.5m	352	214	✓	✗	✗	✓	N/A	✓	✓	
Link 52	12 - >15m	273	117	✓	✗	✗	✓	N/A	✗	✓	
Link 53	5.5 - 7.5m	90	60	✗	✗	✗	✗*	N/A**	✗	✗	* Some limited lengths of overrun. ** Cannot be defined until SPA provided.
Link 54	5 - 5.5m*	52	0	Not proposed to be used by HGVs						**N/A**	* On-street parking on Kirkham Road reduces carriageway to 4.3m.
Link 55	8 - >15m	140	0	Not proposed to be used by HGVs						**N/A**	
Link 56	Not Used									**N/A**	
Link 57a	>15m	241	209	✓	✗	✗	✓	N/A	✓	✓	
Link 57b	>15m	241	209	✓	✗	✗	✓	N/A	✓	✓	
Link 58a	>15m	418	209	✓	✗	✗	✓	N/A	✓	✓	
Link 58b	>15m	418	209	✓	✗	✗	✓	N/A	✓	✓	
Link 59	Not Used									**N/A**	
Link 60	Not Used									**N/A**	
Link 61a	13m	116	88	✓	✗	✗	✓	N/A	✗	✓	
Link 61b	11 - 13m	116	88	✓	✗	✗	✓	N/A	✗	✓	
Link 61c	10 - 12m	116	88	✓	✗	✗	✓	N/A	✗	✓	
Link 61d	12m	116	88	✓	✗	✗	✓	N/A	✓	✓	
Link 62	Not Used									**N/A**	
Link 63	5.5 - 6m	23	16	✗	✗	✗	✗*	N/A**	✓	✗	* Some limited lengths of overrun. ** Cannot be defined until SPA provided.
Link 64	Not Used									**N/A**	
Link 65a	13m	660	290	✓	✗	✗	✓	N/A	✓	✓	
Link 65b	11.5m	660	290	✓	✗	✗	✓	N/A	✓	✓	
Link 65c	>15m	660	290	✓	✗	✗	✓	N/A	✓	✓	
Link 66	Not Used									**N/A**	
Link 67	>15m	990	313	✓	✗	✗	✓	N/A	✗	✓	
Link 68	>15m	1156	313	✓	✗	✗	✓	N/A	✗	✓	
Link 69	7m	67	0	Not proposed to be used by HGVs						**N/A**	Unclear why other vehicles (lights) proposed. Unclear what this link connects to.
Link 70	>15m	1163	313	✓	✗	✗	✓	N/A	✗	✓	
Link 71	>15m	704	101	✓	✗	✗	✓	N/A	✗	✓	

ROUTE (LINK ID)	A. Approximate width of the existing (usable) carriageway (excluding parking bays and cycleways) (taken from Mapping software)	B. 2027 Base daily HGV flows (taken from Table 7.21 of ES Volume 3, Chapter 7)	C. Peak daily construction HGV flows (taken from Table 7.21 of ES Volume 3, Chapter 7)	D. Simultaneous 2-way HGV movement can be accommodated on the link	E. Swept Path Analysis provided for the route	F. Pedestrian, cyclists and equestrian demand identified	G. Overrun does not occur	H. Sufficient waiting areas along the route	I. Link not susceptible to Surface Water Flooding	**Is the route considered suitable for HGVs, having regard to A - I**	General Notes and *column specific comments
Link 72	3.6 - 14m	205	101	✗	✗	✗	✓	N/A*		✗	Forms part of unadopted route and will require use of full width of existing cycleway. * Cannot be defined until SPA provided.
Link 73	M55	4683	568	Strategic Road Network						**N/A**	
Link 74	M55	7511	568	Strategic Road Network						**N/A**	
Link 75	M55	4360	345	Strategic Road Network						**N/A**	
Link 76	M55	2566	151	Strategic Road Network						**N/A**	
Link 77	M6	11758	445	Strategic Road Network						**N/A**	
Link 78	M6	16262	668	Strategic Road Network						**N/A**	
Link 79	M6	21560	668	Strategic Road Network						**N/A**	
Link 80	M6	21898	668	Strategic Road Network						**N/A**	
Link 81	M61	8227	668	Strategic Road Network						**N/A**	
Link 82	M65	7353	445	Strategic Road Network						**N/A**	
Link 83	M61	7010	445	Strategic Road Network						**N/A**	
Link 84	M65	5734	143	Strategic Road Network						**N/A**	
Link 85	M6	13307	668	Strategic Road Network						**N/A**	
Link 86	Not Used									**N/A**	
Link 87	M6	15711	445	Strategic Road Network						**N/A**	
Link 88	Not Used									**N/A**	
Link 89	Not Used									**N/A**	
Link 90	>15m	-	-	Not proposed to be used by HGVs						**N/A**	
Link 91	>15m	2308	143	✓	✗	✗	✓	N/A	✗	✓	
Link 92	>15m	2156	143	✓	✗	✗	✓	N/A	✗	✓	
Link 93	7m	1179	143	✓	✗	✗	✓	N/A	✗	✓	
Link 94	7.2 - 9m	804	143	✓	✗	✗	✓	N/A	✓	✓	
Link 95	7.2m	559	143	✓	✗	✗	✓	N/A	✗	✓	
Link 96	7.1 - 7.5m	462	143	✓	✗	✗	✓	N/A	✓	✓	
Link 97	11.2m	663	143	✓	✗	✗	✓	N/A	✓	✓	
Link 98	>15m	1051	143	✓	✗	✗	✓	N/A	✓	✓	
Link 99	>15m	657	143	✓	✗	✗	✓	N/A	✓	✓	
Link 100	8 - 11m	45	79	✓	✗	✗	✓	N/A	✓	✓	
Link 101	5 - 6.1m*	13	79	✗	✗	✗	✗	N/A	✓	✗	* On street parking reduces carriageway to 3.8m.
Link 102	5.5* - 7m	1	14	✗	✗	✗	✓	N/A	✓	✗	* On street parking reduces carriageway to 3.4m.

Summary of Proposed Routing Strategy

8.66. Table 8.4 highlights those links of the routing strategy that are currently unacceptable to the LHA. The HGV routing to and from individual accesses is currently unclear, and it is unclear in some locations how HGV numbers have been derived (e.g. HGV numbers on Links 5, 14, 20a and 13 do not align).

8.67. There are routes that are proposed, where the existing carriageway is narrow, and in some locations further narrowed by parked cars. The LHA has been unable to locate proposals for the safe and suitable management of 2-way HGV movements in these locations. This is notwithstanding existing users of the route, including agricultural users.

8.68. No evidence or data has been provided regarding sustainable use of the network; this is a concern.

8.69. There are locations where the adopted carriageway is shown on the General Arrangement drawings to be wider than their real width (e.g., Access A10 and A11). This is misleading and incorrect; the carriageway is shown as being 7.5m wide when in reality it is circa 5.5m wide. This is a significant safety concern, because if the routes are used, they will not be able to accommodate 2-way HGVs.

8.70. It is clear from Table 8.4 that the suitability of many of the routes cannot be currently determined, without sufficient Swept Path Analysis of the routes, and therefore the LHA cannot support use of the proposed routes for HGVs. Along with the swept paths, suitable mitigation measures are required that mitigate the issue of two HGVs or HGVs and large agricultural vehicles meeting on narrow sections of highway. The approach applied to determine the acceptability of each route proposed in the application documentation, suggests that 2 HGVs can pass within highway of 5.5m width. This assumption is flawed when regard is had to the width of a HGV with wingmirrors, and a gap between moving HGVs. Notwithstanding, the additional requirements to support the swept path of an HGV when travelling on a carriageway that is not straight. In addition, there are highway links that are proposed to be used, where the usable carriageway is below 5.5m. As presented, this is a significant safety issue.

8.71. For many of the routes, two large vehicles will not be able to pass each other without overrunning the verge. While the applicant may be able to control the direction of their own HGVs to ensure that they do not meet when travelling in opposing directions on the public highway, insufficient detail has been provided, and the applicant cannot control other large vehicles on the public highway. The LHA considers that there is not sufficient width for two large vehicles to pass on some of the proposed routes, that are often used by:

- tractors
- tractors and trailers

- other commercial vehicles related of agriculture (livestock, milk tankers etc.),
- deliveries,
- collections,
- coaches,
- public transport
  (note; this excludes sustainable users such and pedestrians, cyclists and equestrians)

8.72. There are sections along the route where overrun of the carriageway currently takes place, and this would be further exacerbated by the HGV traffic generated by the project. Currently, the documentation does not have regard to damage and safety issues related to verge overrun (damage, compaction, reducing the effectiveness of verge as a drain (French), edge of carriageway deterioration and safety of pedestrians who may use verges). This is a significant safety concern.

8.73. The documentation presented makes the assertion that existing HGV Traffic Regulation Orders (TROs) determine whether a route is suitable for HGVs or not. This is not the case, as HGV TROs are used in locations where historically minor routes have been used as part of a longer route, not in line with a highway hierarchy.

8.74. To raise awareness of works to familiar and unfamiliar users of the network, as well as changes to the highway or access locations, signage along routes is key. The LHA has been unable to locate suitable detail on proposed signage. The LHA would note that due to the width of the carriageway and verge in many locations, there are limited locations where new or amended signage could be erected within constrained corridors.

8.75. To be clear, the routes proposed are fit for the current uses that they facilitate. However, the increased use of these routes for construction traffic over an extended construction period presents significant challenges. This would be in relation to the proposed routing strategy, the safety of highway users and the capacity of the roads on the proposed routes to withstand the impact of multiple HGV movements at all times of the year, without the need for extensive maintenance that may result in prolonged periods of road closure (further discussed under heading ‘Construction Traffic Management Plan’ below).

8.76. The LHA considers that it must be demonstrated by the applicant that all of the above issues can be suitably addressed and overcome, at this stage, prior to any DCO being granted. This has currently not been demonstrated

8.77. The above routes are those that have been put forward by the applicants. There is a concern that when a contractor is appointed, they may have a different strategy with different impacts, whether that is in relation to the proposes routes or the number of vehicles, neither of which will have been assessed.

<u>Roads / Streets Proposed to be Temporarily Closed</u>

8.78. Schedule 4A and 4B of the Draft DCO lists the streets and Public Rights of Way which will be temporarily closed or restricted during construction in connection with the Morgan and Morecambe projects, and the closures are shown on the Street Works Plans (Part 1 and 2).

8.79. While a level of flexibility is required for contractors with regards to the duration and timings of temporary road closures, some level of explicit detail is required at this stage. Regard must also be had to works of others such as maintenance works/improvement works by others that are likely to be required on the routes, during the project, including that related to utilities (gas, water, electricity and communication etc.).

8.80. The detailcurrently presented in isolation cannot be supported by the LHA. There are temporary road closures highlighted that will result in significant impacts on movements on the network, notwithstanding emergency requirements (whether utilities or emergency vehicles dealing with a situation). The proposed closures include, and are not limited to, Starr Gate (MGMC_HA_1A to MGMC_HA_1B), Queensway (MGMC_HA_9A to MGMC_HA_9B) and the M55 to Heyhouses Link Road (MG_HA_2A to MG_HA_2B, MC_HA_2A to MC_HA_2B and MGMC_HA_10A to MGMC_HA_10B. There are no details regarding the expected durations of closures or anticipated timings of the closures. Any highway closures at the same time (that is a possible scenario from the currently presented Draft DCO), would have further significant adverse impacts on the highway network, for example closure of Queensway and the M55 to Heyhouses Link Road. This is a significant concern.

8.81. Closure of the well-used, defined cycle route, the Guild Wheel (MGMC_PA_18A to MGMC_PA_18B) is not acceptable to the LHA. There are proposed closures, for example Leach Lane (MGMC_HA_6A to MGMC_HA_6B) and The Hamlet (MGMC_HA_8A to MGMC_HA_8B), that would sever vehicular access to a number of residential properties. This is a significant concern.

8.82. Road closures must be by liaising and agreement with the LCC/Blackpool Borough Council Street Works permit teams in advance and need to be integrated into the Street Works teams' process and timescales, as wider matters will need to be consulted on such as Public Transport Services, notwithstanding suitability of any proposed diversion route and potential utility (planned or emergency) works on such routes which cannot be determined at this stage.

Public Rights of Way (PRoW)

8.83. The impact of the development on the amenity and the quality of the user experience of the PRoW network has not been adequately addressed in the application. This aspect needs to address the impact on both the tourism industry and the local communities. As presented, the documentation makes no commitments and does not have regard to the needs of the community, but only provides a process regarding changes and closures.

8.84. It is not clear, with regard to impacts on PRoW, on what routes will be open, diverted and closed, and whether continuous alternative routes are available. The strategy that is being considered, for example where a PROoW crosses a haul road, is unclear. The principles need to be agreed at this stage to provide certainty to users. This needs to follow a legal process with mitigation provided by the developer to ensure that safety is not compromised and that PRoW's as far as possible remain open.

Construction Traffic Management Plan (CTMP)

8.85. An Outline Construction Traffic Management Plan (CTMP) has been provided as part of the application documentation. It is the LHA's view that an acceptable and agreed in principle CTMP must be developed at this stage, prior to the DCO being approved. While it is acknowledged that certain details such as:

- Access routes;
- Accesses;
- Provision of safe waiting areas beyond sites/compounds;
- Daily vehicle numbers;
- Co-ordination of vehicles, within the highway (which is beyond the applicant's control);
- Processes to deal with emergency situations beyond the applicant's control;
- Dashcam in all vehicles and tracking
- Enforcement of the CTMP by subcontractors, drivers and deliveries
- Disciplinary procedures for potential breaches

note: this list is not full inclusive

can only be firmed up once a contractor has been appointed by the applicant (this highlights the importance of early contractor involvement prior to the DCO), the LHA must be satisfied that the content and the principles of the CTMP demonstrate that safe and suitable access can be achieved. It should also be demonstrated that the impacts of the proposal that have been assessed can be managed with appropriate mitigation as necessary and controlled by suitable requirements. Based upon the information presented, the LHA does not consider that the level of certainty required in relation to these matters has been provided, which is a significant concern in relation to safety on the public highway.

8.86. There are, in addition, specific points along the onshore cable corridor where the order limits are constrained, or the construction works will occur very close to residential properties. Limited information has been presented on how the development will be undertaken and managed on highway routes (including residential streets and narrow rural lanes) that would be used by pedestrians (local or visitors), cyclists and equestrians, whether individually or active groups

i.e., walking, running or cycling groups using particular corridors, or well used defined routes i.e., the Guild Wheel.

8.87. In addition, at this stage, the Outline CTMP does not consider all the known events that take place on the Fylde Coast, including the Lytham Festival, golf tournaments, Blackpool illuminations and general coastal tourism in both Fylde and Blackpool. This information is critical to ensure that a safety and acceptable approach is put forward by the applicants, that does not adversely impact on safety or on the short or long term recreational activity that the Fylde coast relies on. The lack of detail is a significant concern, that impacts on familiar and unfamiliar traffic.

8.88. With regard to any emergency situations, there does not appear to be much information/communication by the applicants, prior to the DCO application being submitted, related to emergency planning, or information provided to assess the impacts to be assessed. This makes it difficult to understand whether the onshore construction activity has been properly assessed against the pre-existing civil emergency risks or if aspects of the construction activity will impact on pre-existing Lancashire wide emergency response arrangements.

8.89. This development will result in many HGVs operating on several routes simultaneously, without restriction. Therefore, if an incident occurs on a parallel route or a route used by the project, it is not clear as to whether that issue can be safely managed. Issues could include:

- Flooding;
- Emergency road closures as a consequence of utilities; and
- Highway maintenance on parallel routes not used by this project, requiring a road closure.

8.90. Notwithstanding these highway matters, it is unclear what regard has been had to the below ground telecommunications linked to Blackpool Airport and to NATS radar station, which also serves Manchester Airport.

8.91. No clear regard has been had to the needs of utility companies who can legally work within the highway or the needs of delivering other development, and their impacts on the existing network, whether works on the seafront or other developments in Blackpool or Fylde, including developments such as Blackpool Airport Enterprise Zone (BAEZ) and Richmond Point. A cumulative assessment needs to be undertaken. Works such as BAEZ and Richmond Point will make significant changes to the highway network in the vicinity of the proposed access routes. This must be taken into consideration and currently has not been.

8.92. There is therefore a significant amount of further information that needs to be provided and work that is necessary to understand how construction along the cable corridor will be managed to mitigate the potential impacts; this detail and information is required at this stage, prior to any DCO being granted.

Road Condition Monitoring and Maintenance Strategy

8.93. LCC's experience on other infrastructure projects has highlighted the impacts of project delivery and the consequences on the highway network as a result of substantial increases of HGV movements, particularly on the historic rural narrow highway network that has not been constructed to modern standards and therefore is not able to accommodate the additional impact/loading created as a result of major construction projects. This impact will necessitate continual temporary maintenance (and/or permanent maintenance) which will impact on corridor/availability/reliability, funded by the developer. This has implications for all road users not just the construction traffic and routeing. This impact also needs to be considered in the assessment. In addition to ongoing necessary maintenance, more significant maintenance schemes will be required, having further impacts, as highlighted above. Even with maintenance, road closures as a consequence of failure may still occur, impacting upon local communities and the development.

Note: All maintenance to be fully funded by the applicant as part of a recent major development project, was secured through a s.278 agreement, and on principal roads through a s.59 of the Highways Act 1980) to ensure that the highway network post development is no worse condition than prior to commencement. The form of the legal agreements and their principals to be agreed prior to any DCO being granted. It is acknowledged that the above comments have greater relevance on more rural working compounds.

8.94. Road condition monitoring (initially supported by a table top exercise and then by detailed and followed up with regular surveys and post completion surveys) is critical to best manage the development impacts and the required maintenance including pre-emptive works on all routes, with the detail being agreed with the LHAs (LCC and BBC). **T**hese critical matters must be agreed at this stage, prior to any DCO being granted. It is strongly recommended that no works should commence until the requisite legal agreements have been secured with initial surveys and pre-emptive works being agreed with the LHAs and delivered by the developer. This is necessary to ensure that access routes will be maintained (throughout the Morgan and Morecambe project), allowing unrestricted access, not only for construction traffic but also to satisfy the needs of all other highway users.

8.95. *Note: There is a concern that the contractor may wish to use other corridors or increase the intensity in the use of a corridor that has not been assessed or may not form part of the DCO. Also, there is a further risk, if a route has been closed as a consequence of the development, that the contractor may use an alternative route that has not been assessed and considered suitable, with a strategy in place to ensure it is maintained and fit for purpose and benchmarked against an initial survey. This would exacerbate the situation further impacting upon a wider community and its safety.*

8.96. All structures and bridges along the proposed routes will require assessing. There are routes that are proposed to be used where improvement works on bridges have been identified, but are not currently required based on existing usage. As a consequence of HGV movements from the project, these works would likely be required at a number of such structures.

8.97. The LHA requires a commitment from the applicant on this matter at this stage, prior to any DCO being granted. It is critical that the necessary controls are in place and that measures will be delivered to limit traffic impacts as well as nuisance and vibration to those properties that would be impacted. Whilst some issues arising relate to, and may be resolved by, changes to the highway, they may require other agencies involvement (e.g. Lancashire Constabulary and the Local Planning Authority). Strong communication and cooperation between the applicants and all the interested parties, including the LHA, will be required in order to ensure that highway operation is safe and convenient, and the adverse impacts of the development are addressed in a timely manner, by the applicant, on an ongoing basis.

Conclusion

8.98. The Local Highway Authorityrecognises the national benefit of this project and what it provides, meeting the renewable energy targets and creating sustainable economic growth in Lancashire. However, it is important that this is achieved without significant damage to the local built and natural environment, local communities and tourist economy. The local impacts of the projects and their cumulative impacts should be considered and adequately addressed by the applicant at this application stage of the project.

8.99. This section of the report provides a review of the highway impacts from the proposal with consideration for all relevant information uploaded on the Planning Inspectorate website to date, including the significant amount of information has been uploaded in December 2024.

8.100. Currently, there are a number of outstanding matters and areas where further information is required from the applicant in order for the LHA to fully understand the impacts of this proposal and provide final concluding comment, or to be able to offer support for the application. There are areas where the County Council has significant concerns that are currently unresolved that have been highlighted in the above section.

8.101. The submitted information is lacking in evidence to support the suitability (with/without mitigation or changes) or feasibility of much of the routeing (highways including structures within) for this project, whether to support their own vehicles, abnormal loads or the consequences to other users. Notwithstanding any rectification works post-scheme or post-delivery of abnormal loads, or the further impacts on the highway network as part of any decommissioning.

8.102. As evidence is lacking to support the suitability of routeing, no (specific) discussion with the LHA on the likely impacts has been had, and the

consequences of delivery of this project are unknown, it is not possible to indicate what needs to be mitigated against. This is notwithstanding the likely significant damage to highway (including structures), and as a consequence, the risk of road closures. In addition, the applicant is not clear on how development related damage will be overcome.

8.103. The full cumulative impacts of the existing and potential future projects in the impacted area have not been adequately assessed within the applications. Despite the assessments within the Environmental Statement identifying residual impacts from the project regarding landscape and visual effects, ecology and setting of heritage assets, no mitigation and/or compensation is proposed irrespective of mechanism (s.106 UU or s.278).

8.104. Guiding detail has not been discussed, described or agreed on, including how the approach will work, which can then support the detail and subsequent agreements that will be needed to ensure that development impacts during construction will not be severe and gives LCC certainty that all can be adequately addressed by the applicant.

8.105. The applicant has not provided sufficient evidence or mitigation to ensure that the issues that have been highlighted in these comments can be overcome or suitably managed. The LHA is currently not satisfied that that proposal is safe and suitable or that the highway issues can be overcome through DCO Requirements or further along the DCO process. The LHA cannot currently accept the highway proposals, even in principle, as issues and concerns of significance exist with the current proposals.

8.106. When the necessary further information is presented, the LHA expect to be able to conclude matters in an updated response. However, based on the information provided to date, the LHA recommend that any decision on this application is not concluded, until all outstanding/further information is presented and considered by the LHA, and concluding remarks are presented back.As currently submitted, the proposal does not have the LHA's support.

8.107. It is disappointing that all key aspects of the applicant's approach were fixed prior to masses of information being shared, as LCC fully embrace collaboration, wanting to provide support for any project, irrespective of size, having the benefit of local knowledge. Unfortunately, with the approach taken to this project, having a close working arrangement and sharing good practice and knowledge in overcoming issues was not possible. This is very disappointing. However, LCC is still very keen to work closely with the applicants and their consultants to reduce differences that are contained within these comments.

9. Public Rights of Way (PRoW)

Planning Policy Context

Development Plan Policy

9.1. Relevant Development Plan policy includes the following:

- Blackpool Local Plan Part 1: Core Strategy (2012-2027), Policy CS5;
- Blackpool Local Plan Part 2, Policy DM41;
- Fylde Local Plan to 2032 (incorporating Partial Review) Adopted December 2021, Policy HW1;
- Central Lancashire Adopted Core Strategy July 2012, Policy 24;
- Preston Local Plan 2012-2026 Policy EN3;
- South Ribble Local Plan (Adopted July 2015) Policy G8.

Other Relevant Policy Documents

9.2. In addition to the development plan policy set out above the following documents also need to be considered:

- Lancashire Rights of Way Improvement Plan 2015-2025

National Planning Policy

9.3. Relevant national planning policy includes the following:

- National Planning Policy Framework (December 2024), Chapter 8, Paragraphs 96, 103 and 105.

Key Issues

9.4. .

9.5. Although an initial meeting with the applicant was positive, PRoW would like to see a management plan including the mitigation measure for the paths impacted. This should include details on all proposed temporary closures/diversions along with the anticipated duration of the closure. The betterment for the rights of way was raised at the meeting and is intended to be requested following the opportunity to review the information requested above.

The following table details the public rights of way that would be affected by the proposed development and the specific management / mitigation measures that are required.

Type	Local Authority area(s)	Reference	Outline management measure	Grid reference	Total length affected (m)
Bridleway	Fylde	**5-2-BW 16**	Trenchless techniques proposed at this location. No management required.	[334943, 430945]	100
		5-2-BW 11	Managed crossing during the construction phase.	[333317, 431008]	462
		5-2-BW 12	Trenchless techniques proposed at this location. No management required.	[334011, 430977]	229

Type	Local Authority area(s)	Reference	Outline management measure	Grid reference	Total length affected (m)
		5-3-BW 12	Trenchless techniques proposed at this location. No management required.	[338472, 429472]	294
		5-2-BW 13	Trenchless techniques proposed at this location. No management required.	[334011, 430977]	229
		5-9-BW 12	Managed crossing with segregated access at the temporary construction compound during the construction phase.	[344832, 430019]	485
		5-5-BW 16	Temporary diversion where cable trenching works are proposed during the construction phase.	[343433, 430938]	Existing: 974 With temporary diversion: TBC
Definitive Map Modification Order	South Ribble	**7-9-DMMOO**	Trenchless techniques proposed at this location. No management required.	[350476, 428027]	53
Footpath	Fylde; South Ribble	5-3-FP 2	Managed crossing during the construction phase.	[340855, 429758]	931
	Fylde	5-9-FP 9	Coincides with operational access. No management required.	[347670, 429754]	4
		5-5-FP 2	Managed crossing of construction access tracks during construction phase. Permanent gated crossing of operational access to onshore substation during operation phase.	[344252, 429897]	22
		5-9-FP 7	Managed crossing during the construction phase.	[345334, 430267]	76
		5-5-FP 3	Managed crossing of construction access tracks during construction phase. Permanent gated crossing of operational access to onshore substation during operation phase.	[343863, 430118]	208
		5-2-FP 8	Trenchless techniques proposed at this location. No management required.	[331203, 430717]	518
		5-3-FP 4	Managed crossing during the construction phase.	[341494, 429913]	297
		5-9-FP 8	Coincides with operational access. No management required.	[346385, 430114]	78

Type	Local Authority area(s)	Reference	Outline management measure	Grid reference	Total length affected (m)
		5-5-FP 4	Managed crossing of construction access tracks during construction phase. Permanent gated crossing of operational access to onshore substation during operation phase.	[344048, 429755]	22
		5-9-FP 5	Trenchless techniques proposed at this location. No management required.	[344355, 430187]	643
		5-3-FP 5	Managed crossing during the construction phase.	[341803, 430037]	169
		5-9-FP 6	Coincides with operational access and mitigation land. No management required.	[345650, 430475]	8
	Preston	**6-8-FP 21**	Managed crossing during the construction phase.	[348362, 430020]	27
	South Ribble	**7-9-FP 4**	Trenchless techniques proposed at this location. No management required.	[349246, 428869]	278
		7-9-FP 11	Trenchless techniques proposed at this location. No management required.	[350587, 428058]	28
		7-9-FP 5	Managed crossing during the construction phase.	[349677, 428634]	638
		7-9-FP 9	Coincides with operational access. No management required.	[350477, 428315]	603
		7-9-FP 7	Managed crossing during the construction phase.	[349852, 428368]	488
		7-9-FP 10	Trenchless techniques proposed at this location. No management required.	[349860, 427789]	449
		7-9-FP 3	Coincides with operational access. No management required.	[349651, 428962]	7
Long Distance Footpath	Fylde; Blackpool	**Lancashire Coastal Way**	Trenchless techniques proposed at this location. No management required.	[330944, 430724]	591
	South Ribble	**Ribble Way**	Trenchless techniques proposed at this location. No management required.	[349245, 428863]	224
National Cycle Route	Fylde; Blackpool	**NCR 62**	Trenchless techniques proposed at this location. No management required.	[330944, 430724]	1019
	Preston	**NCR 622**	Managed crossing over the bridge, with widening of the existing route to the north and south of the bridge (where required) during the construction phase.	[348314, 429906]	364

10. Ecology

Planning Policy Context

Development Plan Policy

10.1. Relevant Development Plan policy includes the following:

- Blackpool Local Plan Part 2, Policy DM35
- Fylde Local Plan to 2032 (incorporating Partial Review) Adopted December 2021, Policy ENV2: Biodiversity;
- Central Lancashire Adopted Core Strategy July 2012, Policy 22; and
- South Ribble Local Plan (Adopted July 2015), Policies G13 and G16

Other Relevant Policy Documents

10.2. In addition to development plan policy set out above the following documents also need to be considered:

- *Local Nature Recovery Strategy (LNRS)*

10.3. It is recommended that Lancashire's emerging Local Nature Recovery Strategy should be taken into account, in:

- Protecting and enhancing identified areas of particular importance for biodiversity;
- Contributing to achievement of agreed priorities and delivery of identified potential measures, taking account of mapped opportunity areas and target species;
- Considering the strategic significance of habitats:
  - Local Nature Recovery Strategy - Lancashire County Council
  - LNRS Local Habitat Map

National Planning Policy

10.4. Relevant national planning policy includes the following:

- National Planning Policy Framework (December 2024), Chapter 15, paragraphs 187, and 193-195.
- National Policy Statements, including:
  - Overarching National Policy Statement for Energy (EN-1)
  - National Policy Statement for Renewable Energy Infrastructure (EN-3);
  - National Policy Statement for Electricity Networks Infrastructure (EN-5)
- The National Planning Policy Framework (NPPF);
- Local Plan policies.

10.5. Section 5.3 of National Policy Statement EN-1 sets out requirements in respect of Biodiversity and geological conservation.

10.6. National Policy statement EN-1 states that "*Where the development is subject to EIA the applicant should ensure that the ES clearly sets out any effects on internationally, nationally and locally designated sites of ecological or geological conservation importance, on protected species and on habitats and other species identified as being of principal importance for the conservation of biodiversity. The applicant should provide environmental information proportionate to the infrastructure where EIA is not required to help the IPC consider thoroughly the potential effects of a proposed project*".

10.7. National Policy statement EN-1 also states that "*The applicant should show how the project has taken advantage of opportunities to conserve and enhance biodiversity and geological conservation interests*".

Guidance

10.8. It would be appropriate for the following guidelines to be given consideration by the Examining Authority authority:

- National Infrastructure Planning guidance and advice notes including for example:
    - Advice Note Seven: Environmental Impact Assessment
    - Advice Note Ten: Habitats Regulations Assessments

- Government Circular: Biodiversity and Geological Conservation – Statutory Obligations and their impact within the planning system (ODPM 06/2005, DEFRA 01/2005);
- Planning for Biodiversity and Geological Conservation: A Guide to Good Practice (March 2006);
- Relevant Planning Practice Guidance;
- CIEEM Guidelines for Ecological Impact Assessment, 2018;
- Ecological Impact Assessment Checklist (CIEEM & ALGE, 2019);
- BS42020 Biodiversity – Code of Practice for Planning and Development.
- Biodiversity net gain. Good practice principles for development - CIEEM, IEMA & CIRIA (2019); and
- Recognised survey and mitigation guidelines, including (but not limited to) current Natural England standing advice, guidelines and Technical Information Notes.

<u>Key Legislation, Policies, Strategies And Guidance</u>

10.9. In determining this application, the requirements of the following legislation, policies and guidance should be addressed:

Legislation (and associated guidance)

- The Planning Act 2008 and associated secondary legislation;
- The Environment Act 2021 and associated secondary legislation;
- Infrastructure Planning (Environmental Impact Assessment) Regulations 2017;
- The Conservation of Habitats and Species Regulations 2017 (as amended);
- The Wildlife and Countryside Act 1981 (as amended);
- The Natural Environment and Rural Communities Act 2006 (as amended);
- The Eels (England and Wales) Regulations 2009;
- The Protection of Badgers Act 1992.
- Government Circular: Biodiversity and Geological Conservation – Statutory Obligations and Their Impact Within The Planning System (DEFRA 01/2005, ODPM 06/2005).

Key Issues

10.10. Summary of the key ecological issues arising from the proposal include:

- The adequacy/completeness of the ecological surveys and assessments undertaken.

- Measures to avoid or minimise ecological impacts.

- Implications for statutory designated sites and their qualifying features, including:

    - Ribble and Alt Estuaries Special Protection Area (SPA) and Ramsar Site (partly within the Order limits).
    - Ribble Estuary Site of Special Scientific Interest incorporating Ribble Estuary NNR (Partly within Order limits).
    - Lytham St Anne's Dunes SSSI (Partly within Order limits).
    - Ribble Estuary Marine Conservation Zone (Partly within Order limits).
    - Lytham Coastal Changes SSSI (Impact Risk Zone within order limits).
    - Newton Marsh SSSI (Impact Risk Zone within order limits).
    - Lytham St. Anne's Local Nature Reserve (Partly within the Order limits).

- Implications for Functionally Linked Land supporting SPA qualifying species.

- The requirement for the Examining Authority to undertake a Habitats Regulations Assessment in respect of internationally designated sites, qualifying species/features and functionally linked land.

- Implications for non-Statutory designated sites and their qualifying features, including the following Biological Heritage Sites (Lancashire non-statutory wildlife sites) that intersect with the Order limits:

    - Freshfield Farm ponds North (BHS 43SW06).
    - Freshfield Farm Ponds South (BHS 43SW05).

- Lytham Foreshore Dunes and Saltmarsh (BHS 32NW01).
- St Anne's Old Links Golf Course and Blackpool South Railway Line (BHS 33SW02).
- Lytham Moss (BHS 33SE W1).
- Lea Marsh (BHS 42NE06).
- River Ribble lower tidal section (BHS 42NE03).
- Mill Brook Valley (BHS 52NW01).
- Howick Hall Ponds (BHS 52NW11).
- Mason's Wood (BHS 42NE07).
- Savick Bridge (BHS 42NE04).
- Westby Clay Pit (BHS 33SE01).
- Booths Plantation (BHS 42NE09).

- Implications for Lytham St Anne's Dunes Geological Site.

- Roadside verges recognised for their biodiversity value at Queensway (Partly within the Order limits).

- Irreplaceable habitats recognised in The Biodiversity Gain Requirements (Irreplaceable Habitat) Regulations 2024, including:
  - Coastal Sand Dunes
  - ancient woodland
  - ancient and veteran trees

- Other habitats that would be technically very difficult (or take a very significant time) to restore, recreate or replace, including:

  - Habitats of lowland peat
  - Coastal habitats

- Habitats of Principal Importance, such as:

  - Coastal habitats including:
    - Coastal Sand Dunes.
    - Coastal Saltmarsh
    - Coastal and Floodplain Grazing Marsh
    - Mudflats
  - Good quality semi-improved and marshy grasslands including:
    - Lowland meadow
    - Purple moor-grass and rush pasture
  - Woodland habitats including:
    - Lowland mixed deciduous woodland
  - Wetland habitats including:
    - Lowland fen
    - reedbed
  - Ponds
  - Rivers and streams
  - Hedgerows

- Hedgerows classified as 'Important' (Hedgerow Regulations, 1997) or species-rich.

- Mature trees and their root protection zones.

- Habitats created to mitigate the ecological impacts of earlier developments, including the M55-Heyhouses link road.

- Habitats supporting diverse invertebrate assemblages.

- Protected species and their habitat, including:

    - Great Crested Newt
    - Otter
    - Bats
    - Sand Lizard
    - Other reptiles such as Common Lizard and Slow Worm
    - Water vole
    - Breeding Birds
    - Badgers
    - Eel

- Protected species mitigation licence requirements.

- The requirement for the Examining Authority to have regard to the Habitats Regulations in respect of licensable impacts on protected species.

- Species of Principal Importance and their habitat, including (For example):

    - Common Toad
    - Hedgehog
    - Brown Hare

- Important and Sensitive Bird Areas.

- Wintering birds

- Notable Invertebrates including (for example):

    - Alder Leaf Beetle and Mud Pond Snail (Red Data Book Species)
    - Burreed Pollen Beetle (the only record in Lancashire)

- Other notable species, such as:

    - Species of conservation concern
    - Locally or nationally rare, scarce or threatened species
    - Lancashire Biodiversity Action Plan Species

- Invasive non-native species.

- Habitat connectivity, wildlife corridors and ecological networks.

- Delivery of biodiversity gains as required by national policy, including management and monitoring of replacement habitats.

- Compliance with legislation, policy and best practice guidance relevant to ecology and nature conservation.

- Consideration of Lancashire's emerging Local Nature Recovery Strategy, including:

    - Mapped Areas of Particular Importance for Biodiversity.
    - Mapped Areas that could become of Importance for Biodiversity.
    - Agreed Priorities
    - Identified Potential Measures

- Ecological impacts arising from wider environmental effects such as hydrological changes, pollution, air quality etc.

10.11. The submitted environmental statement acknowledges that there is the potential for significant effects on:

- Lytham St. Anne's Dunes SSSI,
- Lytham St. Anne's LNR,
- Three Biological Heritage Sites,
- Bats,
- Great Crested Newts,
- Otters,
- Sand lizards,
- Aquatic invertebrates,
- Terrestrial invertebrates.

<u>Recommended Considerations</u>

10.12. It is recommended that the Examining Authority should give consideration to the following matters as part of the examination, in consultation with its own ecological advisors:

Further Consultation

- Appropriate specialists should be consulted regarding:
    - Legal interpretation of statutory requirements.
    - Impacts on the stability and dynamics of sand dunes.
    - Impacts on peat.
    - Biosecurity issues, including (but not restricted to) avoiding the spread of pests, diseases and invasive species.

- Wider environmental matters such as issues relating to noise, air quality, emissions, pollution, ground water changes and other hydrological effects, etc.
- Risks of bentonite breakout during trenchless cabling.
- Off-shore ecological implications of the proposals.

- The Environment Agency should be consulted regarding:
  - Hydrological effects and related impacts.
  - Matters relating to pollution prevention.
  - Impacts on the aquatic environment.
  - Impacts on fish populations and associated mitigation requirements.

- The Marine Management Organisation should be consulted regarding implications for:
  - The Ribble Estuary Marine Conservation Zone.
  - Off-shore ecological implications of the proposals.

- Natural England should be consulted regarding:
  - Impacts on statutory designated sites, qualifying features/species and functionally linked land (taking account of Impact Risk Zones).
  - Habitats Regulations Assessments.
  - Other requirements of the Habitats Regulations.

- It is recommended that relevant nature conservation organisations should also be given the opportunity to comment (For example, Fylde Bird Club, RSPB, Lancashire Wildlife Trust, Amphibian and Reptile Conservation Trust etc).

<u>Adequacy/completeness of ecological surveys/assessments</u>

10.13. The Examining Authority will need to be satisfied that all ecological surveys, and assessments have been undertaken by appropriately qualified, licenced and experienced ecologists in accordance with the requirements of legislation, policy and best practice guidance.

10.14. Owing to access constraints, 8.5% of the Onshore Order Limits and 19.6% of the survey area were assessed from surveys undertaken in adjacent parcels, through the use of aerial photography and desk-based analysis, rather than site-based habitat surveys. The Examining Authority will need to consider implications for identifying:

- Notable habitats
- Habitats of potential value to legally protected or otherwise notable species.
- Implications for consideration of statutory requirements such as licensing and Habitats Regulations requirements.
- The potential need for avoidance of impacts on un-surveyed areas.

10.15. It is recommended that examination of the scheme should ensure that the impact assessment has taken account of all areas of particular importance for

biodiversity identified within the emerging Local Nature Recovery Strategy for Lancashire.

Measures to Avoid or Minimise Ecological Impacts

10.16. It needs to be clearly demonstrated that the mitigation hierarchy has been applied to all elements of the scheme in accordance with the principles stated within the National Planning Policy Framework (NPPF). If significant harm to biodiversity resulting from a development cannot be avoided, adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused (NPPF 2024, paragraph 193).

10.17. The Examining Authority will need to be satisfied that there is no satisfactory alternative location or design solution with a reduced ecological impact, taking particular account of the sites, habitats and species listed above and discussed further below.

10.18. The application documents and data accessible to Lancashire County Council indicate that the proposed development could potentially have impacts on important ecological sites, habitats and species, including those summarised above. Potential impacts of the proposed scheme and associated works include (for example):

- habitat loss,
- habitat degradation and disturbance,
- habitat fragmentation, severance and isolation,
- ecological impacts arising from hydrological changes,
- potential killing, injury and disturbance of protected and priority species,
- destruction or disturbance of habitats used by protected and priority species,
- impacts arising from lighting, noise, vibration, dust etc.

10.19. It needs to be demonstrated that the location and design of all elements of the proposed development and associated works have been informed by the ecological surveys, in order to avoid or minimise ecological impacts.

10.20. Wherever alignment of cable construction corridors and siting of infrastructure and working areas cannot be adjusted to avoid impacts on sensitive sites, habitats, features and species, then directional drilling or other approaches that avoid open trenching should be considered.

Statutory Designated Sites

10.21. The proposed scheme may have impacts on statutory designated sites including those listed above. Natural England should be consulted in respect of potential impacts on International and National statutory designated sites (such as SPA and SSSI).

10.22. A Habitats Regulations Stage 1 Screening report and Stage 2 Information to support an appropriate assessment have been submitted with the application.

Specialist advice should be sought when assessing the information submitted to inform the Habitats Regulations Assessment.

10.23. The determining authority is a competent authority for the purposes of the Habitats Regulations and has a duty to consider whether the proposals would result in likely significant effects on an internationally designated site.

10.24. The Examining Authority will need to confirm if sufficient information has been provided to establish whether or not there would be a likely significant effect on any European Designated Site, qualifying features or functionally linked land. If so, it will need to be ensured that the applicant has provided sufficient information to enable the Examining Authority to undertake an appropriate assessment in accordance with the requirements of the Habitats Regulations and related case law.

Local Nature Reserve

10.25. Lytham St. Anne's Dunes LNR is within the Onshore Order Limits. The LNR is situated within the SSSI. The applicant proposes that loss of habitat will be avoided through the use of direct-pipe trenchless technology. The Examining Authority will need to be satisfied that the proposals are sufficient to avoid impacts on the LNR. A DCO Requirement should be considered to secure necessary avoidance measures.

Non-Statutory Designated Sites

10.26. Planning decisions should contribute to and enhance the natural and local environment by protecting and enhancing sites of biodiversity value (NPPF 2024, Section 187).

10.27. Eleven Biological Heritage Sites are located wholly or partially within the Onshore Order Limits. Measures are therefore required to protect Biological Heritage Sites and their qualifying features, as well as other sites of biodiversity value, from the impacts of this development.

10.28. Measures to avoid such impacts through alignment of cable corridors, haul roads and micro-siting of infrastructure and working areas would therefore be appropriate. Where avoidance of impacts through micro-siting and realignment is not possible, then alternative avoidance measures would be appropriate, such as directional drilling or other trenchless techniques. A DCO Requirement to agree final avoidance measures and secure their implementation would be appropriate.

10.29. The main predicted impacts on Biological Heritage Sites are summarised below. The Examining Authority should consider the possibility of design amendments to avoid such impacts. If the Examining Authority is satisfied that these impacts are unavoidable, then final mitigation/compensation measures should be agreed and their implementation secured through an appropriate DCO Requirement. It should be demonstrated through application of the biodiversity metric that overall biodiversity gains would be delivered.

10.30. The scheme, as currently proposed, would result in a permanent loss of habitat (including qualifying features) within:

- Freshfield Farm Pond North and South Biological Heritage Sites.
- Mill Brook Valley BHS.

10.31. The proposed development would affect pink-footed goose, whooper swan and their habitat at Lytham Moss Biological Heritage Site.

10.32. The applicant proposes that, beneath Mason's Wood BHS, a grid connection cable corridor would be installed using trenchless techniques. It should be demonstrated that this alignment is unavoidable. If so, it should be demonstrated that that the trenchless techniques would avoid detrimental impacts on the BHS and its qualifying features, including tree root protection zones.

10.33. Temporary access through Biological Heritage Sites should be avoided wherever possible. A pedestrian construction access route within Lytham Foreshore Dunes and Saltmarsh BHS is proposed, using existing areas of bare sand across the dunes and foreshore associated with public access to the beach. This could exacerbate erosion impacts within the BHS. It is suggested that specialist advice be sought in relation to potential impacts on the stability of sand dunes. Appropriate DCO requirements to prevent impacts on Biological Heritage Sites resulting from temporary access would be appropriate.

Habitats

10.34. Notable habitats that could be affected by the proposed scheme are summarised above. This includes habitats identified within the submitted survey reports and others that may not have been detected owing to acknowledged survey access constraints.

Irreplaceable Habitats

10.35. Development resulting in the loss or deterioration of irreplaceable habitats should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists (NPPF 2024, paragraph 193). NPPF, 2024 defines irreplaceable habitats as: " *Habitats which would be technically very difficult (or take a very significant time) to restore, recreate or replace once destroyed, taking into account their age, uniqueness, species diversity or rarity*".

10.36. In order to meet requirements of the NPPF as well as statutory requirements, it would be appropriate to apply this to all habitats listed in The Biodiversity Gain Requirements (Irreplaceable Habitat) Regulations 2024 and any other habitats that would be technically very difficult (or take a very significant time) to restore, recreate or replace (as per NPPF definition).

10.37. No works that could have a detrimental impact on irreplaceable habitats should be approved unless the applicant provides a robust statement to describe

alternatives explored to avoid these impacts and why they were not feasible. Bespoke compensation measure should be provided for any unavoidable impacts on irreplaceable habitats and should be secured by an appropriate DCO Requirement.

10.38. Coastal sand dunes and a veteran tree are statutory irreplaceable habitats and occur within the order limits. The occurrence of lowland fen habitat within the zone of influence may also be possible (owing to un-surveyed areas and sensitivity of the habitat to wider impacts of pollution or hydrological changes).

10.39. Directional drilling is proposed to avoid impacts on coastal dunes. The determining authority will need to be satisfied that this is adequate to avoid detrimental impacts on the habitat. Appropriate specialist advice should be sought. If impacts would be unavoidable then a suitable compensation strategy will need to be agreed and its implementation secured by DCO Requirement.

10.40. The Environmental Statement states that the veteran tree can be retained. A DCO Requirement to protect the tree and its root protection zone would be appropriate.

10.41. Peat deposits occur within the Order limits. The potential impacts of the proposed development on peat and habitats of peat soils should be considered by the Examining Authority. The England Peat Action Plan 2021 should be taken into account in examining the proposed scheme and appropriate specialists should be consulted. DCO requirements to secure appropriate avoidance, mitigation and compensation proposals may be appropriate.

Other Notable Habitats

10.42. Habitats of Principal Importance could potentially be affected by the proposed development such as (for example):

- Coastal habitats including:
    - Coastal Sand Dunes.
    - Coastal Saltmarsh
    - Coastal and Floodplain Grazing Marsh
    - Mudflats
- Good quality semi-improved and marshy grasslands including:
    - Lowland meadow
    - Purple moor-grass and rush pasture
- Woodland habitats including:
    - Lowland mixed deciduous woodland
- Wetland habitats including:

    - Lowland fen
    - reedbed

- Ponds
- Rivers and streams
- Hedgerows

10.43. This takes into account:

- Records available to Lancashire County Council.
- Submitted desk study and field survey results.
- Access constraints preventing field survey of 8.5% of the Onshore Order Limits and 19.6% of the survey area.
- Sensitive habitats within a potential wider zone of influence (such as those that may be sensitive to hydrological changes or pollution).

10.44. The Environmental Statement acknowledges that there would be a loss of (or impacts on) some of these habitats, including:

- Coastal and floodplain grazing marsh
- Coastal saltmarsh
- Deciduous woodland
- Good quality semi-improved grassland
- Ponds
- Hedgerows

10.45. The Examining Authority will need to be satisfied that any impacts on notable habitats, including Habitats of Principal Importance, are unavoidable, taking into account direct losses or damage to habitats as well as wider impacts such as hydrological changes or pollution. Consideration should be given to adjustments to cable corridor alignment and micro-siting of infrastructure and working areas to avoid impacts on these habitats. If infrastructure/assets cannot be located to avoid these habitats, then the potential for horizontal directional drilling or other trenchless techniques should be considered. A DCO requirement to secure protection of these habitats and/or appropriate mitigation/compensation measures would be appropriate.

Species

Protected Species

10.46. The proposed works have the potential to have impacts on protected species, such as:

- Killing or injury,
- Destruction of eggs
- Damaging levels of disturbance,
- Destruction of habitats including breeding sites and places of shelter.

10.47. ODPM Circular 06/2005, referenced in Footnote 68 of NPPF 2024, states that "*It is essential that the presence or otherwise of protected species, and the extent that they may be affected by the proposed development, is established before the planning permission is granted*" and that "*the survey should be completed and any necessary measures to protect the species should be in place, through conditions and/or planning obligations, before the permission is granted*" (Paragraph 99).

10.48. DEFRA Circular 01/2005 states that if protected species are reasonably likely to be present and affected by the proposed development, then a survey/assessment to establish the presence or absence of protected species and the extent that they may be affected by the proposed development needs to be undertaken before planning permission is granted (Para 99).

10.49. Owing to access constraints, 8.5% of the Onshore Order Limits and 19.6% of the survey area were assessed from surveys undertaken in adjacent parcels, through the use of aerial photography and desk-based analysis, rather than site-based surveys. Prior to determination of the application, the determining authority will need to ensure that sufficient surveys have been undertaken in order to:

- identify potential impacts such as those listed above,
- meet national policy requirements such as those listed above,
- meet statutory and licencing requirements for all relevant species as discussed below.

<u>Species Protected under The Conservation of Habitats and Species Regulations 2017</u>

10.50. Bats, great crested newts, otters and sand lizard are present in the vicinity of the proposed scheme. Measures to avoid any breach of The Habitats Regulations are therefore needed. If such a breach would be unavoidable, then a Natural England Licence would be required before development work could commence.

10.51. The Conservation of Habitats and Species Regulations 2017 (as amended) state that public bodies, in the exercise of their functions, must have regard to the requirements of the Habitats Directive. This means that the Examining Authority will need to have regard to the requirements of the Directive in reaching a decision. Therefore, if a Natural England Licence would be required for the development, then the Examining Authority will not be able to approve a scheme if there is reason to believe that the necessary licence would not be issued. This means that the Examining Authority will need to consider the licensing tests prior to determination of the application. In summary, these tests are that:

1. The works are required for a purpose specified in the Conservation of Habitats and Species Regulations (Reg 55), such as:

- preserving public health or public safety or other imperative reasons of overriding public interest, including those of a social or economic nature and beneficial consequences of primary importance for the environment.

2. There is no satisfactory alternative.
3. The action authorised will not be detrimental to the maintenance of the population of the species concerned at a favourable conservation status in their natural range.

10.52. If there would be licensable impacts on any European protected species or its habitat, the application will therefore need to demonstrate how the above 3 tests will be addressed. This should include mitigation proposals to address the third test. The mitigation proposals should be informed by adequate survey data on population size and distribution, collected in accordance with recognised guidelines.

Great Crested Newts

10.53. There are records of great crested newts within the order limits and the vicinity. Environmental DNA survey results submitted by the applicant confirm the presence of great crested newts. The proposed scheme would affect terrestrial and aquatic habitats suitable for the species, including ponds where the presence of great crested newts has been confirmed. Killing, injury or damaging levels of disturbance are likely and there is potential for other environmental impacts on the species, such as pollution.

10.54. The applicant has stated the intention to apply for a Natural England District Level Licence for great crested newts. An Impact Assessment and Conservation Payment Certificate (IACPC) therefore needs to be submitted to the Examining Authority. Provided the IACPC has been signed on behalf of Natural England and the site details and boundaries of the IACPC are the same as the Development Consent Order (DCO) application, the IACPC can be relied upon by the Examining Authority as confirmation that the impacts of the development on great crested newts are capable of being fully addressed in a manner which complies with the requirements of the Habitats Regulations.

Sand Lizard

10.55. A population of sand lizard occurs within the Order limits on dune habitat of the Ribble Estuary SSSI and Lytham St. Anne's Dunes SSSI.

10.56. No sand lizard surveys appear to have been undertaken in connection with this application. The populations have been monitored by the Fylde Sand Dune Project Steering Group between 2021 and 2023. Monitoring shows that sand lizards are still present at Fylde Dunes.

10.57. The applicant proposes that installation of the export cables at Lytham St Annes Dunes SSSI will be undertaken using a direct pipe trenchless technique to pass cables beneath the foredune habitat in the Ribble Estuary SSSI. The

Environmental Statement states that this area supports the majority of the sand lizard population. The Examining Authority will need to understand the implications for all elements of the sand lizard population within the order limits and vicinity.

10.58. The potential for disturbance to sand lizards is acknowledged within the Environmental Statement and outline measures to mitigate this impact are proposed.

10.59. Prior to determination of the application, the Examining Authority will need to be satisfied that all licensable impacts on the species and its habitat will be avoided. This should include (for example) consideration of:

- all parts of the sand lizard population and their habitat.
- the adequacy of the proposed trenchless technique in avoiding damage to sand lizards and their habitat,
- the adequacy of proposed mitigation measures in avoiding damaging levels of disturbance.

10.60. If avoidance of licensable impacts cannot be demonstrated then the licensing tests (above) will need to be considered. The determining authority would need to ensure that there was sufficient information and data, to inform consideration of the licencing tests. Consultation with suitable species specialists would be appropriate. The Examining Authority should not approve the application if there is reason to believe that any necessary licence would not be issued.

10.61. Notwithstanding the potential need to consider the licensing tests, a DCO Requirement relating to the avoidance of impacts on the species would be appropriate.

Bats

10.62. The scheme would affect habitats suitable for foraging/commuting and roosting bats. Construction throughout the Order limits would involve the removal of trees with potential for roosting bats. A risk of killing or injuring bats, as well as roost abandonment are also acknowledged within the Environmental Statement. There is also potential for night-time lighting during construction of the substation that would contribute to habitat disturbance and fragmentation.

10.63. There are numerous records of bat species in the vicinity of the proposed scheme. Survey reports provided by the applicant confirm use of the area by foraging/commuting bats of various species. Three bat roosts have been identified within survey reports submitted by the applicant, as well as numerous potential roosting features within trees and structures. However, 8.5% of the Onshore Order Limits and 19.6% of the survey area were not included within the site-based habitat surveys and the Environmental Statement acknowledges other limitations on the bat surveys undertaken.

10.64. The scheme should be designed and measures should be implemented to avoid impacts on bat habitats, including roosts, potential roosting features and important feeding/commuting habitat.

10.65. If impacts are shown to be unavoidable, then the determining authority, in consultation with its ecological advisors, will need to establish whether or not a Natural England licence would be required. Given the acknowledged limitations of the surveys as notced above, it will need to be ensured that there is sufficient survey data to inform this consideration. If there would be licensable impacts, then the licensing tests (above) will need to be considered.

10.66. The Environmental Statement acknowledges that it is unlikely that bats would continue to use a hibernation roost that is located in woodland adjacent to land required for the National Grid connection compound. It seems likely that a licence would be considered necessary in this case as with all other cases of roost destruction.

10.67. Aside from the potential need to consider the licensing tests, a DCO Requirement relating to the avoidance of impacts on the species would be appropriate. As well as avoidance of impacts on roosting features, this should include maintaining flight paths throughout construction and mitigation of lighting impacts.

Otter

10.68. A confidential technical report on otters has been submitted for consideration by the determining authority. Construction within the onshore Order limits will involve activities in and close to aquatic habitats with potential to be used by otter. It is acknowledged within the Environmental Statement that the loss and disturbance of these areas has the potential for killing and injuring otter. Otter would also be vulnerable to other impacts such as pollution.

10.69. The scheme should be designed and measures should be implemented to avoid impacts on otters and their habitat. Some avoidance measures have been proposed, including use of trenchless techniques beneath suitable habitat. A DCO Requirement for detailed avoidance measures to be submitted for approval would be appropriate.

10.70. If impacts on otters are shown to be unavoidable, then the determining authority, in consultation with its ecological advisors, will need to establish whether or not a Natural England licence is required. It will need to be ensured that there is sufficient survey data to inform this consideration. If there would be licensable impacts, then the licensing tests (above) will need to be considered prior to determination of the application.

10.71. <u>Other Protected Species</u>

Water Vole

10.72. There are water vole records in the vicinity of the proposed scheme and the field survey report indicates potential presence of the species.

10.73. Measures should be implemented for the avoidance of impacts on water vole. This should include detailed alignment of cable corridors, haul roads, micro-siting of infrastructure and construction techniques to avoid impacts on habitat suitable for water vole. This should be the subject of a DCO Requirement.

10.74. If impacts on water vole can be shown to be unavoidable, then the need for a Natural England licence will need to be considered.

Reptiles

10.75. In addition to Sand Lizard (discussed above), there are records of slow-worm and common lizard in the vicinity of the proposed scheme. These species may occupy suitable habitats within the working area before or during the works. It will need to be ensured that there is no breach of the legislation protecting these species. Precautionary working methods including pre-construction surveys would therefore be appropriate. This should be the subject of a DCO Requirement.

Badger

10.76. A confidential technical report on badgers has been submitted for consideration by the Examining Authority.

10.77. The scheme should be designed and measures should be implemented to avoid impacts on badgers and their habitat. If such impacts are shown to be unavoidable, then the Examining Authority, in consultation with its ecological advisors, will need to establish whether or not there would be licensable impacts on badgers and to determine appropriate mitigation/compensation measures.

10.78. A DCO Requirment for detailed avoidance measures to be submitted for approval would be appropriate.

Eel

10.79. European Eel were recorded during the site surveys. It will need to be demonstrated how any breach of relevant legislation (including obstructing the passage of eels) will be avoided. A relevant DCO Requirement would be appropriate.

Breeding birds

10.80. The proposed scheme would result in a loss of habitat suitable for breeding birds (including ground nesting species). DCO requirements would be appropriate to avoid any breach of legislation protecting breeding birds and to ensure appropriate replacement habitat.

Other Notable Species

10.81. Other notable species and their habitat that could be adversely affected by the proposed development include:

- Species of Principal Importance (NERC Act, 2006) including:
  - Brown Hare,
  - Hedgehog,
  - Common Toad,
- Birds of Conservation Concern (including wintering and breeding birds),
- Plants (including botanical interest within part of the River Ribble, Lower Tidal Section BHS),
- Invertebrates (including notable species and assemblages of ponds and terrestrial habitats within the Order limits).

10.82. Other notable species and their habitat that could be adversely affected by the proposed development include:

10.83. The Examining Authority will need to be satisfied that the scheme has been located and designed in a way that avoids or minimises impacts on these species. The need to revise the scheme to avoid these impacts should be considered. A DCO Requirement relating to avoidance, mitigation and compensation for impacts on these species would be appropriate. This should include micro-siting of infrastructure and working areas, construction techniques, pre-construction surveys and other precautionary working methods.

Fish

10.84. The Examining Authority should consult the Environment Agency and other appropriate specialists to determine potential impacts and appropriate DCO Requirements for the protection of fish populations. This should include measures to avoid impacts on suitable habitats, such as micro-siting of infrastructure, use of trenchless techniques and pollution prevention measures.

Invasive Species

10.85. There are records of invasive species in the vicinity of the proposed scheme. Pre-commencement surveys are proposed to map out the distribution of such species. Measures will need to be implemented to prevent the spread of invasive species as a result of the works. A DCO Requirement for measures to prevent the spread of invasive species would be appropriate.

Mitigation, Compensation and Biodiversity Gains

10.86. The results of surveys and impact assessments undertaken should inform the design of the proposed development and associated mitigation, restoration, compensation and enhancement measures.

10.87. Mitigation and compensation measures should include targeted habitat creation/enhancement measures for all identified impacts on sites habitats and species discussed above.

10.88. It should be demonstrated that impacts will be mitigated, that compensation will be provided for all unavoidable impacts and that enhancement measures will provide an overall net gain in biodiversity value. It should be demonstrated that mitigation and compensation proposals meet the requirements of legislation, policy and guidance summarised below.

10.89. Planning decisions should contribute to and enhance the natural and local environment by minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures and incorporating features which support priority or threatened species (NPPF 2024, Section 187). Opportunities to improve biodiversity in and around developments should be integrated as part of their design (NPPF 2024, Section 193).

10.90. The scheme is exempt from the mandatory requirement to deliver 10% biodiversity net gain. However, it would be appropriate for the applicant to submit evidence to demonstrate that the above NPPF requirement to provide net gains for biodiversity will be achieved. The statutory biodiversity metric is a universally recognised mechanism for calculating biodiversity losses and gains (including parameters for temporary impacts). A DCO Requirement would therefore be appropriate requiring submission of the complete biodiversity metric to accompany full details of proposed habitat creation and enhancement, demonstrating overall gains for area-based habitats, hedgerows and water courses.

10.91. It is recommended that mitigation, compensation and biodiversity gain measures should seek to contribute to delivery of Lancashire's emerging Local Nature Recovery Strategy (LNRS). This should include:

- Protecting and enhancing identified areas of particular importance to biodiversity.
- Contributing to achievement of agreed priorities and delivery of identified potential measures, taking account of mapped opportunity areas.

10.92. The scheme should include proposals for maintaining, restoring and enhancing habitat connectivity within the application area and the wider landscape.

10.93. Habitat creation should not be at the expense of existing habitats or features of ecological importance. Habitat creation proposals should comprise native plant communities appropriate to the location, soils, hydrology and site conditions. Guidance on native species selection is given on Lancashire County Council's Ecology webpages:

- Ecology advice for developers - Lancashire County Council
- Plant-species-appropriate-for-habitat-creation-in-Lancashire.pdf

10.94. Mitigation measures should include protection of retained habitats, species and features of ecological value, including those listed above as well as tree root protection measures. Details can be included within a Construction Environmental Management Plan or similar document. This should be the subject of a DCO Requirement.

Management and Monitoring

10.95. Establishment maintenance and long-term management and monitoring proposals for retained, restored and replacement habitats should be provided, including remedial action to be taken in the event of failed habitat establishment. This should be the subject of a DCO Requirement.

10.96. The timescale of the management and monitoring commitment should be stated. A 30-year management and monitoring commitment would be appropriate, in line with current and emerging requirements relating to Biodiversity Net Gain.

10.97. It should be demonstrated how the necessary maintenance and management will be secured for the lifetime of the anticipated DCO requirements.

10.98. Monitoring measures should be sufficient to measure the success of mitigation and compensation measures, to inform the need for remedial measures and to inform establishment maintenance and long-term management.

Suggested DCO Requirements

10.99. If the Examining Authority is minded to give consent to the above proposals (or any amended proposals), then it is recommended that the DCO requirements suggested below should be considered in relation to ecological matters.

10.100. No site clearance, site preparation, demolition, earth moving or development, shall take place, and no construction materials or machinery should be brought onto the site, until the following documents/details have been submitted and approved by the determining authority in consultation with its ecological advisors and other appropriate specialists. The approved measures must be implemented in full.

- Detailed design information including:
    - Detailed alignment of cable routes, haul roads and construction corridors and micro-siting of infrastructure, access routes and working areas, demonstrating that ecological impacts have been avoided or minimised.
    - Locations where horizontal directional drilling or other trenchless techniques will be implemented to avoid or minimise ecological impacts.
    - Design details addressing avoidance of impacts on:
        - Statutory designated sites and their qualifying features
        - Biological Heritage Sites and their qualifying features
        - Other non-statutory designated sites

        - Verges identified for their biodiversity importance.
        - Statutory irreplaceable habitats and other habitats that would be technically very difficult (or take a very significant time) to restore, recreate or replace.
        - Habitats of Principal Importance (NERC Act, 2006).
        - Important and species-rich hedgerows.
        - Mature trees and their root protection zones.
        - Habitats created to mitigate the ecological impacts of earlier developments, including the M55-Heyhouses link road.
        - Habitats supporting diverse invertebrate assemblages.
        - Hydrologically sensitive habitats.
        - Protected species and their habitat
        - Species of Principal Importance (NERC Act 2006) and their habitat.
        - Wintering birds and their habitat.
        - Other notable species such as species of conservation concern and their habitat.

- A Construction Environmental Management Plan (or similar document). The document shall include (*inter alia*):

    - Precautionary working methods for the avoidance of any breach of legislation including (but not limited to):

        - The Conservation of Habitats and Species Regulations 2017 (as amended);
        - The Wildlife and Countryside Act 1981 (as amended).

    - Details of all licences/permits/consents/exemptions to be in place prior to commencement of works.
    - Details of responsible persons and organisations, including lines of communication.
    - The role and responsibilities and the operations to be overseen by an appropriately competent person (e.g. ecological clerk of works / on site ecologist).
    - The times during the works when specialist ecologists will be present on site to oversee works.
    - Training and/or briefing of site operatives on ecological matters and required working methods and procedures to ensure compliance with legislation and DCO requirements.
    - An ecological constraints plan to be issued to the contractor, including (*inter alia*):

        - Identification of biodiversity protection zones / exclusion zones around sensitive sites, habitats, features and species;
        - Locations of demarcated working areas/exclusion zones, including details of barriers, fences, warning signs and their maintenance throughout construction;
        - Details of all pedestrian and vehicular access routes, demonstrating avoidance of ecological impacts.

        - Designated sites;
        - Known locations of protected and priority species and their habitat;
        - Tree root protection areas;
        - Exclusion zones surrounding water bodies and water courses.

- A method statement for the felling of trees with bat roost potential.
- Measures that will be taken to ensure compliance with relevant parts of BS42020 - Biodiversity Code of practice for planning and development.
- Procedures to be followed if the unforeseen presence of protected species is detected or suspected at any stage before or during the works;
- Precautionary working methods for the avoidance of impacts on the following species and their habitats (including precautionary pre-construction surveys):

    - Protected species
    - Priority species (NERC Act, 2006)
    - Species of conservation concern
    - Qualifying species of designated sites
    - Other notable species.

- Avoidance of impacts on nesting birds, their nests and eggs, including appropriate timing of site clearance works to avoid the nesting season (March to August inclusive).
- Protection of animals from entrapment in open excavations, pipes, tunnels etc.
- Maintaining commuting/migration/flight paths throughout construction.
- Measures to prevent disturbance of sensitive species and habitats as a result of lighting, noise, vibration, vehicle movements, storage of materials or other causes;
- Protection of retained and replacement habitats from construction works and related operations, including:

    - Measures to protect statutory and non-statutory designated sites, including a bespoke method statement for each potentially affected site.
    - Exclusion of sensitive sites and habitats from construction works, working areas, compounds and access routes.
    - Tree root protection measures in accordance with BS5837.
    - Demarcation of working areas and exclusion zones.
    - Measures to protect habitats and exclusion zones from machinery, disturbance and storage of materials.
    - Protection of water courses and water bodies from silt or other pollution.
    - Avoidance of soil compaction
    - Protection of habitats from impacts of hydrological changes.
    - Protection of sand dunes and other sensitive habitats from erosion, trampling and machinery access.

- Control/eradication/preventing the spread of invasive non-native species, including:
    - Any plants listed on Schedule 9 of the Wildlife and Countryside Act 1981 (as amended).
- Biosecurity measures.
- Air quality and dust management.
- Soil management proposals including protection of peat soils and associated habitats.
- A programme of works, demonstrating avoidance of seasonal ecological constraints such as:
    - Hibernation
    - Breeding seasons.

- Details of mitigation and compensation measures for anticipated impacts on protected species, species of principal importance (NERC Act S41), species of conservation concern, qualifying species of designated sites or other notable species identified within the Environmental Statement. The measures shall include/specify:
    - Proposals for precautionary pre-works surveys/inspections.
    - The purpose and conservation objectives for the proposed works.
    - Detailed designs and working methods to achieve stated objectives.
    - Extent and location/area of proposed works on appropriate scale maps and plans.
    - Short-term and long-term protection against killing or injury, including any necessary barriers and commuting routes.
    - Replacement nesting/roosting/hibernation/resting place features.
    - Establishment of replacement habitat to meet the needs of the species at all life cycle stages.
    - Maintenance of habitat connectivity.
    - Type and source of materials to be used where appropriate,
    - Timetable for implementation demonstrating that works are aligned with the proposed phasing of development and seasonal ecological constraints.
    - Persons and organisations responsible for implementing the works.
    - Details of initial aftercare and long-term maintenance.
    - Details for monitoring and remedial measures.
    - Details for disposal of any waste arising from works.

- Details of bespoke compensation for any unavoidable impacts on irreplaceable habitats and other habitats that would be technically very difficult (or take a very significant time) to restore, recreate or replace.

- A detailed scheme for biodiversity enhancements, including:
    - Responsible organisations, personnel and lines of communication.

- Baseline information and ecological survey data for all habitat creation and enhancement locations. This shall demonstrate that habitat creation will not be at the expense of any existing priority habitat or populations of protected and priority species.
- Information about the steps to be taken to minimise the adverse effect of each phase of development on biodiversity within the order limits.
- Full and complete biodiversity gain calculations, calculated using the statutory biodiversity metric and accompanied by supporting plans, demonstrating biodiversity gains in accordance with National Policy.
- Clearly stated aims and objectives with reference to the site survey, evaluation and assessment of impacts.
- Details of all habitat creation considered necessary to achieve Natural England licences (subject to approval by Natural England as part of the licensing process).
- Habitat creation and management for species populations affected by the works, including:

    - Protected species
    - Priority species (NERC Act, 2006)
    - Species of conservation concern
    - Qualifying species of designated sites
    - Other notable species.

- Restoration and enhancement of statutory and non-statutory designated sites, including bespoke compensation measures for each affected site.
- Habitat creation for the enhancement of habitat connectivity and buffering of designated sites.
- Contributions to delivery of the priorities and potential measures identified within Lancashire's emerging Local Nature Recovery Strategy, taking account of mapped opportunity areas and target species.
- Details of all target habitats to be created, re-established or enhanced, including in-situ habitat reinstatement and other habitat creation to compensate for ecological impacts of the scheme and to deliver biodiversity net gain.
- Planting and seeding mixes, comprising native species appropriate for the location, soil, hydrology and site conditions.
- Detailed proposals and methods for translocation of habitats and species.
- Detailed methods for translocation of materials from affected ponds to maintain populations of notable invertebrates.
- Protection measures for seeded/planted areas.
- Planting plans and habitat management compartment plans.
- Detailed habitat creation proposals, including site preparation and habitat establishment methods including watering.
- Targeted habitat creation for species likely to be affected by the proposed scheme.
- Full details of nest boxes, roosting boxes, hedgehog shelters, hibernacula, habitat piles, other wildlife shelters, their proposed locations, installation proposals and their maintenance.

- A work programme, including timing of all works for each development phase.

- A habitat management and monitoring plan, including:

  - A description and evaluation of the sites, habitats and features to be managed (or reference to this information in other documents).
  - Responsible organisations, personnel and lines of communication.
  - Measures that will be taken to ensure compliance with relevant parts of BS42020 - Biodiversity Code of practice for planning and development.
  - Clearly stated aims, objectives and success criteria.
  - Management options and constraints.
  - A rationale for all prescribed management.
  - Detailed maintenance, management and monitoring prescriptions for all retained and replacement habitat, to achieve the stated aims and objectives.
  - Disposal of arisings.
  - Weed control methods
  - Management of recreational pressure.
  - A 5-year establishment maintenance plan for all habitats.
  - A further 25-year management plan (Years 6-30).
  - Monitoring locations, timing and durations.
  - Collection of baseline data to inform the monitoring proposals.
  - A monitoring plan, including details of data collection methods, to demonstrate successful habitat creation and achievement of stated objectives and to inform the need for adjustments to the approved management regime.
  - Contingency plans and remedial action to be implemented in the event of failed habitat establishment or other mitigation measures.
  - A detailed habitat compartment map.
  - A detailed work programme.
  - Periodic review of the management plan including reporting and consultation with the determining authority.
  - Stated legal, contractual and funding mechanisms to secure long-term management.

- A plan for monitoring impacts on dune stability and dynamics. The plan shall specify remedial action to be taken in the event that detrimental impacts are identified.

10.101. Works for which a Natural England licence is expected to be required shall not commence unless or until the determining authority is provided with either:

- a copy of the licence issued by Natural England, or
- a copy of a written statement from Natural England, confirming that a licence is not required.

10.102. Prior to decommissioning, a decommissioning environmental management plan or equivalent document should be submitted for approval by the determining authority. The approved document shall be implemented in full.

This shall specify proposals for the avoidance and mitigation of ecological impacts during decommissioning.

11. Drainage and Flood Risk

Planning Policy Context

Development Plan Policy

11.1. Relevant Development Plan policy includes the following:

- Blackpool Local Plan Part 1: Core Strategy (2012-2027), Policy CS9.
- Blackpool Local Plan Part 2, Policies DM33 and DM35;
- Fylde Local Plan to 2032 (incorporating Partial Review) Adopted December 2021, Policies CL1 and CL2; and
- Central Lancashire Adopted Core Strategy July 2012, Policy 29;

Other Relevant Policy Documents

11.2. In addition to development plan policy set out above the following documents also need to be considered:

- Lancashire County Council Ordinary Watercourse Regulation Policy; and
- Lancashire Local Flood Risk Management Strategy 2021 – 2027

National Planning Policy

11.3. Relevant national planning policy includes the following:

- National Planning Policy Framework (December 2024), Chapter 14, 161, 164-168,and 170-186;
- National Policy Statement for Water Resources Infrastructure (April 2023); and
- Defra Technical Standards for Sustainable Drainage Systems (March 2015).

Role of Lancashire County Council as the Lead Local Flood Authority

11.4. Lancashire County Council is the Lead Local Flood Authority for the areasubject to these proposals. In this capacity, the County Council has a role in the planning process as a statutory consultee for major development with surface water drainage, under the Town and Country Planning (Development Management Procedure) (England) Order 2015. Additionally, the County Council regulates consentable activities affecting ordinary watercourses through 'ordinary watercourse consent' under the Land Drainage Act 1991 (as amended).

Key Issues

Impacts to Watercourses and Community Engagement

11.5. The Lead Local Flood Authority is aware, through reports of flooding and by working in partnership with other flood risk management authorities, that there are complex flood risk and land drainage issues within the Transmission Assets Order Limits that require careful consideration by the Applicant. The applicant's commitment (CoT84) in Section 1.4.1.6 of the Outline Code of Construction Practice (MOR001-FLO-CON-ENV-RPT-0124 MRCNS-J3303-RPS-10058 Rev F01, Dated September 2024) to appoint an Agricultural Liaison Officer in time for commencement of pre-construction activities is welcomed. It is understood that this Officer will be the dedicated point of contact for ongoing engagement about practical matters with landowners, occupiers, and their agents during pre-construction and construction phases. It is strongly advised that this role be extended to include proactive engagement with other communities and landowners likely to be impacted by the works, including but not limited to:

- Clifton;
- Freckleton;
- Kirkham;
- Lytham St Annes;
- Penwortham; and
- Wrea Green.

11.6. It is of note that the area through which the proposed export cable corridor travels is generally low lying, with little gradient, and is crisscrossed by many watercourses (both main river and ordinary watercourses) that are essential for land drainage and managing flood risk. Consequently, these watercourses are sensitive and susceptible to siltation and flood risk and should be retained wherever possible, in accordance with commitments CoT39 and CoT82 of the Outline Code of Construction Practice (MOR001-FLO-CON-ENV-RPT-0124 MRCNS-J3303-RPS-10058 Rev F01, Dated September 2024).

11.7. Where modifications to watercourses are unavoidable, the identified impacts must be appropriately considered, justified and mitigated by the Applicant, in accordance with commitments CoT41, CoT82, CoT86, and CoT121 of the Outline Code of Construction Practice (MOR001-FLO-CON-ENV-RPT-0124 MRCNS-J3303-RPS-10058 Rev F01, Dated September 2024). Further detail on how the Lead Local Flood Authority would normally expect this to be achieved is available in the County Council's Ordinary Watercourse Regulation Policy.

Vegetation Removal and 'Buffer Zones' for Watercourses

11.8. The removal of trees and hedgerows may have an impact on the stability of the banks of ordinary watercourses. Removal of established trees and hedgerows can also have an impact on the local flood risk as these contribute to the local land drainage. The Applicant's commitment to replace and restore trees and hedgerows like-for-like in terms of their species is welcomed. However, it is important to recognise that it will take many years for these newly planted trees

and hedgerows to become established and return the local hydrological environment to its pre-construction conditions. Therefore, their removal should be further considered in the Detailed Operational Drainage Management Plan and Detailed Code of Construction Practice to demonstrate the impact on local flood risk, land drainage and structural bank stability is considered, assessed, and mitigated.

11.9. Paragraph 1.7.2.7 of the Outline Code of Construction Practice (MOR001-FLO-CON-ENV-RPT-0124 MRCNS-J3303-RPS-10058 Rev F01, Dated September 2024) commits the Applicant to "measures to mitigate flood risk arising from surface water runoff to be implemented during the construction of crossings include stand-off distances from main rivers, ordinary watercourses and associated flood defences (CoT10)." However, it is noted that the wording of CoT10 in Table 1.2 relates only to watercourses classified as 'main rivers' and not to those classified as 'ordinary watercourses'. It is recommended that further clarification is sought on mitigation measures for ordinary watercourses in relation to this point to avoid confusion and ambiguity at later stages of the project.

'Unmapped' Ordinary Watercourses

11.10. Not all ordinary watercourses are mapped on the 'main river map' published on gov.uk. This is the map which Lead Local Flood Authorities use to identify whether a watercourse is classified as 'main river' or 'ordinary', and this is a consistent approach across England. To mitigate the risk to unmapped ordinary watercourses, the project team is expected to treat any feature that has the potential to be an ordinary watercourse, as defined in Section 72 of the Land Drainage Act 1991, as such. This will include compliance with the 'Protective Provisions for the Lead Local Flood Authority' contained within the Development Consent Order.

National Flood Risk Assessment 2 (NaFRA2)

11.11. The Applicant should be aware that the national flood risk assessment has recently been updated by the Environment Agency. The National Flood Risk Assessment 2 (NaFRA2) is an updated flood risk assessment model developed by the Environment Agency, superseding the previous 2018 update on which the current Flood Risk Assessment and Operational Drainage Management Plan are based.

11.12. The new NaFRA2 maps were published on 25th March 2025 and are a material consideration in planning and development decisions. The new NaFRA2 data is publicly available via:

- check your long term flood risk
- data.gov.uk
- Flood map for planning - GOV.UK

11.13. As this new mapping and modelling was not available at the time the Flood Risk Assessment and Operational Drainage Management Plan were complied, the

Lead Local Flood Authority considers that it would be unreasonable to expect this evidence to be updated prior to and during the examination stage. However, it is considered reasonable to expect the Applicant to use the new NaFRA2 maps and data when developing, preparing and submitting the Detailed Operational Drainage Management Plan and Detailed Code of Construction Practice to consider and inform their assessment, understanding and mitigation of flood risks and subsequent sustainable drainage design. This is important to ensure there is no increase in flood risks as a result of the development.

11.14. NaFRA2 uses new data and improved methods, enhancing the accuracy and resolution of flood risk modelling. As a result, some areas may now be shown to be at a different level of flood risk than before the new modelling was released. The flood risk modelling within the project area for the Morgan and Morecambe Offshore Wind Farm Project appears to have changed, and the new "Risk of Flooding from Surface Water" map generally indicates higher levels of surface water flood risk. Screenshots on the following page illustrate examples of these changes.

Risk of Flooding from Surface Water
Project Area south of Division Lane

Previous

New

Risk of Flooding from Surface Water
Project Area west of Clifton

Previous

New

Requirement of Our Consent re Disapplication of Section 23 of the Land Drainage Act 1991 - Protective Provisions

11.15. The Lead Local Flood Authority is currently considering its consenting to the disapplication of Section 23 of the Land Drainage Act 1991 (as amended), but would seek to secure powers to consent to certain works in ordinary watercourses and the final details of the proposed works through the Protective Provisions included in the draft Development Consent Order Schedule 10, Part 10 ('For the protection of the Lead Local Flood Authority'). The current wording of the draft Protective Provisions does not sufficiently reflect the Lead Local Flood Authority's current powers and it is the authority's view that they require refinement to better align with the Land Drainage Act 1991 and the statutory duties and responsibilities of the Lead Local Flood Authority and other relevant parties. The authority is actively negotiating this with the relevant Project Teams to develop and agree on revised wording. The Project Team seems to understand these requirements.

11.16. The Project Team is also seeking disapplication of Section 30 of the Land Drainage Act. However, that is not a matter for the Lead Local Flood Authority to consent to, as the Body making Orders under Section 30 is the First Tier Tribunal.

Operational Drainage Management Plan

11.17. If designed incorrectly, the proposed increase in impermeable area, both above and below ground, across the extent of the Order Limits could lead to an increase in flood risk, particularly for surface water, both on-site and elsewhere.

11.18. While the Lead Local Flood Authority has no issues in principle to the proposed outline Operational Drainage Management Plan (MOR001-FLO-CON-ENV-PLN-0061 MRCNS-J3303-RPS-10078 Rev: F01, September 2024), changes are necessary to clarify who will be involved with reviewing and approving the detailed Operational Drainage Management Plan, and how this will be facilitated in practice. Specifically, changes are required to the following parts of the draft Development Consent Order, Schedules 2A and 2B, Requirement 20(1) (Operational Drainage Management Plan):

a) Replace 'Lancashire County Council' with 'the relevant planning authority'.
b) Include the 'Lead Local Flood Authority' as a consultee, alongside the Environment Agency.

11.19. A discrepancy has been identified between the Flood Risk Assessment (Volume 3, Annex 2.3: Flood risk assessment – MOROO1-FLO-CON-ENV-RSA-0002 MRCNS-J3303-RPS-10127 Rev: ES Issue, September 2024) and the outline Operational Drainage Management Plan (MOR001-FLO-CON-ENV-PLN-0061 MRCNS-J3303-RPS-10078 Rev: F01, September 2024). The Flood Risk

Assessment states that "the drainage scheme will provide a minor beneficial benefit in regards to surface water flood risk with the restriction of surface water flows from the site to the 1 in 1-year greenfield runoff rate." However, the outline Operational Drainage Management Plan indicates that the discharge rate will be controlled to the Qbar rate, which corresponds approximately to a 1 in 2-year event. This inconsistency requires clarification as to which return period will be used to control surface water discharge from the site.

11.20. To avoid ambiguity and potential delay at future stages of the project, it is recommended that, as a minimum, the following evidence be specified in the draft Development Consent Order, Schedules 2A and 2B, Requirement 20(1) (Operational Drainage Management Plan) for inclusion in the detailed Operational Drainage Management Plan:

a) Sustainable drainage calculations for peak flow control and volume control for the:

   i. 100% (1 in 1-year) annual exceedance probability event;
   ii. 3.3% (1 in 30-year) annual exceedance probability event + 30% climate change allowance, with an allowance for urban creep;
   iii. 1% (1 in 100-year) annual exceedance probability event + 35% climate change allowance, with an allowance for urban creep.

b) Final sustainable drainage plans appropriately labelled to include, as a minimum:
   i. Site plan showing all permeable and impermeable areas that contribute to the drainage network either directly or indirectly, including surface water flows from outside the curtilage as necessary;
   ii. Sustainable drainage system layout showing all pipe and structure references, dimensions and design levels; to include all existing and proposed surface water drainage systems up to and including the final outfall;
   iii. Details of all sustainable drainage components, including landscape drawings showing topography and slope gradient as appropriate;
   iv. Drainage plan showing flood water exceedance routes in accordance with Defra Technical Standards for Sustainable Drainage Systems;
   v. Details of proposals to collect and mitigate surface water runoff from the development boundary;
   vi. Measures taken to manage the quality of the surface water runoff to prevent pollution, protect groundwater and surface waters, and deliver suitably clean water to sustainable drainage components.

c) Evidence that a free-flowing outfall can be achieved. If this is not possible, evidence of a surcharged outfall applied to the sustainable drainage calculations will be required.

Other Matters Concerning the Code of Construction Practice

11.21. The Lead Local Flood Authority has no issues in principle to the proposed outline Code of Construction Practice (MOR001-FLO-CON-ENV-RPT-0124 MRCNS-J3303-RPS-10058 Rev: F01, September 2024). However, the individual bodies within 'Lancashire County Council' should be specified as separate consultees to avoid ambiguity and potential delays at future stages of the project. Specifically, the following change is recommended to the Development Consent Order, Schedules 2A and 2B, Requirement 8(1) (Code of Construction Practice):

a) Replace 'Lancashire County Council' with the 'Lead Local Flood Authority and the Highway Authority'.

12. Historic Environment

Planning Policy Context

Development Plan Policy

12.1. Relevant Development Plan policy includes the following:

- Blackpool Local Plan Part 1: Core Strategy (2012-2027), Policy CS8;
- Blackpool Local Plan Part 2 Site Allocations and Development Management Policies (Adopted 2024), Policy DM30;
- Fylde Local Plan to 2032 (incorporating Partial Review) Adopted December 2021, Policy ENV5;
- Central Lancashire Adopted Core Strategy July 2012, Policy 16 and
- Preston Local Plan 2012-2026, Policy EN8.

Other Relevant Policy Documents

12.2. In addition to development plan policy set out above the following documents also need to be considered:

Managing Significance in Decision-Taking in the Historic Environment, Historic Environment Good Practice Advice in Planning: 2 (Historic England 2015);
Statements of Heritage Significance: Analysing Significance in Heritage Assets, Historic England Advice Note 12 (Historic England 2019);
Commercial Renewable Energy Development and the Historic Environment, Historic England Advice Note15 (Historic England 2021); and

Planning and Archaeology, Historic England Advice Note 17 (Historic England 2022).

National Planning Policy

12.3. Relevant national planning policy includes the following:

- National Planning Policy Framework (December 2024), Chapter 16, Paragraphs 202 and 207-218.

Key Issues

12.4. The proposals pass through an area of known archaeological interest, and it can be expected that several previously unknown sites of archaeological significance, dating primarily to the prehistoric period, may well be encountered.

12.5. Initial comments on the proposals were made after a consultation was received in November 2022 from Blackpool Council on a Scoping Opinion request (22/0853) in which Lancashire County Council's Historic Environment Team (LCC HET) stated:

"The proposed assessment methodology outlined in section 8 of the Scoping Report is one that the HET would consider entirely appropriate and necessary. The HET would welcome consultation on the proposed sources to be used in compiling the initial the EIA."

The HET was first contacted directly by the Onshore Contents Lead for the project in December 2022 to take part in the Transmission Assets Historic Environment Expert Working Group (EWG) at which stage contact was made with the scheme's archaeological consultant, Mick Rawlings of RPS.

12.6. The Historic Environment Desk Based Assessment (F3.5.1), & Outline Onshore and Intertidal Written Scheme of Investigation (J9) were then both compiled after consultation with the HET as part of the PEIR stage, and although the HET did have a number of comments to make, they have been acted upon (see pp 27-34 of Volume 3, Chapter 5: Historic Environment – F3.5). Our overall thoughts on the PEIR were that the HET was happy with the methodology being followed, and that the proposed further works were an appropriate means to obtain further information as to the nature and extent of the archaeological resource across the proposed development.

12.7. The HET will in due course be providing further comment on the content and conclusions of the various reports (where they relate to the onshore works, see Volume 3, Chapter 5, Annexes 5.1, 5.2, 5.4 & 5.6) that have been submitted for the Development Consent Order application.

12.8. It should however be recognised that the Trial Trenching stage of the evaluation of the route has yet to be completed, the excavation of 139 of a proposed 222 trial trenches, having been reported in Volume 3, Annex 5.6: Interim trial trenching report, and it is therefore not currently possible to provide a definitive

comment on the nature and extent of any further site works that the HET might consider necessary.

13. Land Use

Planning Policy Context

Development Plan Policy

13.1. Relevant Development Plan policy includes the following:

- Joint Lancashire Minerals and Waste Local Plan Core Strategy (February 2009)
- Joint Lancashire Minerals and Waste Local Plan Site Allocations and Development Control Policies Local Plan (September 2013)

Key Issues

13.2. Preston Waste Transfer Station is right on the eastern boundary of the study area butLCC does not consider that it would be significantly affected.

Of more concern is a proposed temporary construction access on the B5259, just north of Lytham Household Waste Recycling Centre. Due to safety concerns with how the site was previously operated, LCC changed the operation of the site after Covid19 and this does result in a backlog of traffic onto the public highway at busy times and during skip changes. The access is on a blind bend and the queuing traffic has been raised as a concern. There is an inert landfill at the golf course just south of the site and there has on occasions been deposits of mud on the road. LCC is concerned that to add further traffic just to the north of the site may cause further disruption and incidents.

14. Draft Statement of Common Ground

14.1. LCC has given initial consideration to the draft Statement of Common Ground (SoCG). The SoCG as drafted, at this stage is not supported by LCC. Whilst the applicants have indicated their position using words such as adequate/sufficient/appropriate then having a status of 'Ongoing point of discussion', LCC considers, to the extent that this suggests that discussions are one step from being agreed, is misleading/inaccurate. LCC does not at this stage consider the stated RAG ratings to be appropriate. It considers that there are still a significant number of matters in relation to which detailed discussions have yet to commence, and where it is currently not the case that they have been resolved.

15. Conclusions

15.1. This report comprises the Local Impact Report (LIR) of Lancashire County Council (LCC) as a host authority for the Morgan Offshore Windfarm Limited and Morecambe Offshore Windfarm Ltd scheme to construct, operate and

decommission two electrically separate transmission systems connecting to the Morgan Offshore Wind Project Generation Assets and the Morecambe Offshore Windfarm Generation Assets.

15.2. LCC has had regard to the purpose of LIRs as set out in s,60(3) of the Planning Act 2008 (as amended), DCLG's Guidance for the examination of applications for development consent and the Planning Inspectorate's Advice Note One, Local Impact Reports, in preparing this LIR.

15.3. This LIR only relates to onshore impacts of the proposed development as it affects the administrative areas of LCC. It analyses the likely local environmental impact of the proposed development. These have been considered under the following headings:

- Landscape and Visual Effects including Green Belts;
- Highways;
- Public Rights of Way (PRoW);
- Ecology;
- Drainage and Flood Risk;
- Historic Environment; and
- Land Use.

15.4. LCC has identified that there are significant shortcomings in the assessment of the environmental impacts of the development, in relation to the issues list above.

15.5. Development plan policy, the NPPF and National Policy Statements require that adverse impacts be weighed against the public benefits. The proposals must properly identify, assess and manage adverse impacts. LCC considers that the DCO and supporting documents are deficient in this regard. The EIA has a failed to properly assess all scenarios and impacts with insufficient, incomplete and inadequate detail.

15.6. The applicants have not committed to the required mitigation which would reduce the adverse impacts which may arise from the multiple phases of development, decommissioning and duplicate infrastructure.

15.7. The likely impacts are that the adverse impacts of the development have not been properly defined, thereby preventing the weighing of those impacts against the public benefits. It has not been demonstrated that the adverse impacts cannot be minimised, in such a manner as accords with policy.