

MORGAN AND MORECAMBE OFFSHORE WIND FARMS: TRANSMISSION ASSETS

**Applicants' Response to Written Representations from Statutory
Consultees and other Organisations**

Deadline: Deadline 2
Application Reference: EN020028

Document Numbers:
MRCNS-J3303-RPS-19082
MOR001-FLO-CON-CAG-0070

Document Reference: S_D2_3
F01

5 June 2025



Document status					
Version	Purpose of document	Approved by	Date	Approved by	Date
F01	Deadline 2	HK	June 2025	IM	June 2025

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Glossary

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

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

1 Applicants' response to Written Representations

1.1 Introduction

- 1.1.1.1 Following Deadline 1, Morgan Offshore Wind Limited and Morecambe Offshore Windfarm Limited (hereafter, 'the Applicants') have taken the opportunity to review each of the Written Representations (WRs) and post hearing submissions received from stakeholders who registered as Interested Parties in the Examination.
- 1.1.1.2 Details of the Applicants' response to each of the Written Representations (WRs) and post hearing submissions of Statutory Consultees are set out in the subsequent sections of this document and its annexes. Applicants' response to Written Representations (WRs) of People with Interest in Land (PWIL) (Document reference: S_D2_2) and others (Document reference: S_D2_4) are provided in separate documents.
- 1.1.1.3 The Applicants have numbered the WRs and post hearing submissions in line with the Planning Inspectorate's document library, with subsequent paragraph number, e.g. REP1-001.1, REP1-001.2, etc.
- 1.1.1.4 This document is accompanied by the following annexes:
- Annex 3.1 to Applicants' Response to WRs from Statutory Consultees: Lancashire Association of Local Councils Fylde Area Committee Energy Working Group (Document reference: S_D2_3.1)
 - Annex 3.2 to Applicants' Response to WRs from Statutory Consultees: Marine Management Organisation (Document reference: S_D2_3.1)
 - Annex 3.3 to Applicants' Response to WRs from Statutory Consultees: Response to Natural England's Risk and Issues Log (Document reference: S_D2_3.1)
 - Annex 3.4 to Applicants' Response to WRs from Statutory Consultees: Newton with Clifton and Freckleton Parish Councils (Document reference: S_D2_3.1)

2 Responses to Written Representations

2.1 Blackpool Borough Council

Table 2.1: REP1-070 –Blackpool Borough Council

Reference	Written Representation Comment	Applicants' response
REP1-070 070.1	<p>Blackpool Borough Council's Written Representation as landowner and owner of the Blackpool Airport companies.</p> <p>1. Blackpool Borough Council ('Council') submits this written representation in its capacity as landowner and owner of the Blackpool Airport companies, on the application for a Development Consent Order (DCO) for the transmission assets associated with the Morgan Offshore Wind Project and the Morecambe Offshore Windfarm ('Application'), submitted by Morgan Offshore Wind Limited and Morecambe Offshore Windfarm Limited (together, the 'Applicants').</p> <p>Blackpool Borough Council's position on the Application</p> <p>2. The Council neither supports nor opposes the Application. The Council at this stage reserves its position subject to further information from the Applicant to satisfy itself of its key concerns regarding the proposed development, set out in this written representation and the LIR.</p>	<p>The Applicants acknowledge Blackpool Borough Council's position and highlight and welcome the ongoing engagement through the Statement of Common Ground process and associated technical meetings that have taken place since Deadline 1.</p>
REP1-070 070.2	<p>Blackpool Borough Council's key issues as land and infrastructure owner</p> <p>3. The Council is the owner of the Blackpool Airport operational and property holding companies, Blackpool Airport Operations Limited, and Blackpool Airport Properties Limited (the ownership structure is set out in the Council's submission at Deadline A [PDA-033]).</p> <p><u>Blackpool Airport</u></p>	<p>The Applicants have identified appropriate mitigation in the form of CoT105 (see Volume 1, Annex 5.3: Commitments Register (AS-030)) to address any potential impacts to Blackpool Airport. Further to this, the Applicants and Blackpool Airport have been in detailed discussions and negotiations to enter into a cooperation agreement regarding the Blackpool Airport works and to address potential impacts on the operations of the Airport. The Applicants will continue to actively engage and work with Blackpool Airport (including post-consent and as a part of detailed design) to ensure the continued safe, efficient and uninterrupted operation of the Airport.</p>

Reference	Written Representation Comment	Applicants' response
	4. It is critical for the ongoing viability of the Blackpool Airport that the proposed development has no operational or reputational/commercial impacts on the airport during construction or operation phases.	
REP1-070 070.3	5. The proposed development red line boundary includes rights and works areas which cover not only the Airport land but also the main Airport runway. These Works and rights currently retain the flexibility to be undertaken as either trenchless or open trench construction. The Applicants are requested to commit to all cable installation at the Airport by trenchless drilling, or set out a detailed engineering explanation as to why they are unable to do so.	As referenced at REP1-070.2, the Applicants and Blackpool Airport have been in detailed discussions and negotiations regarding the works on Blackpool Airport's operational land for many months. The key principle that the Airport requires to underpin the design of the Projects works is that Blackpool Airport are able to ensure the continued safe, efficient and uninterrupted operation of the Airport. The construction techniques to be used within Blackpool Airport are one of the matters currently under discussion with Blackpool Airport. The Applicants are confident that through those discussions the concerns raised can be addressed in full during the Examination.
REP1-070 070.4	<u>Land sterilisation</u> 6. The Council is concerned that it's land interests around the Blackpool Enterprise Zone and the Blackpool Airport may be sterilised or adversely impacted by the works requested in the Application. Protective Provisions in the dDCO are requested by the Council.	Negotiations are underway with Blackpool Council as landowner of the Airport to secure the necessary land rights for the Transmission Assets. Heads of Terms have been issued to Blackpool Airport and Blackpool Borough Council, latest sent 19 th March 2025, and acknowledged by both DWF and their appointed agent Peter Roberts. Engagement on Heads of Terms is progressing with the latest engagement on 1 st May. Given the early, vision stage of proposals for the Blackpool Airport Enterprise Zone, the Applicants do not believe that Protective Provisions are necessary or appropriate. Protective provisions are used to protect existing infrastructure or undertakings, not as protections for future potential interactions which are only speculative at this stage. The Applicants are confident that any concerns Blackpool Council may have regarding land sterilisation can be managed through the land agreements currently under negotiation.
REP1-070 070.5	7. The northern access runs through land earmarked for development of the Silicon Sands digital campus as part of the Council's plans for the Blackpool Enterprise Zone. This has	The northern access route through Blackpool Airport is identified as Work No. 34A34B on the Works Plans – Onshore and Intertidal Part 1 of 2 (AS-016). Work No. 34A34B DCO is for permanent access including creation and improvement of

Reference	Written Representation Comment	Applicants' response
	potential to delay or restrict the development of the Enterprise Zone, or make the Enterprise Zone less attractive to prospective occupiers. The Council seeks greater detail and firmer commitments as to what the northern access route will be used for by the Applicant, and timings for such use.	<p>access to highway and works to visibility splays as defined in Schedule 1 Part 1 Authorised Development of the draft DCO (C1/F04).</p> <p>The northern access route through Blackpool Airport is an operational access. The Project Description states that no construction is proposed for operational accesses. Operational accesses for the onshore export cable corridor and 400kV grid connection cable corridor would typically be accessed using a Light Goods Vehicle or other 4x4 or multi-terrain vehicle. However, no vehicles are proposed to be used along PRowS or bridleways for operation and maintenance activities. The Applicants response to ISH1_38 within REP1-037 states the vehicle movements associated with the planned operation and maintenance hours will be updated from 07:00 – 23:00 to 07:00 – 19:00. An update to the Commitments Register (F1.5.3/F03) has been submitted at Deadline 2.</p> <p>The use of the northern access route is one of the matters currently under discussion with Blackpool Airport and Blackpool Council. The Applicants are confident that through those discussions the concerns related to the northern access can be addressed in full during the Examination.</p>
REP1-070 070.6	8. The cables are proposed to traverse the Airport land south of the runway and rights include land across the main Airport runway. The application documents do not provide commitments as to the depth which these cables will be laid or the construction methodology. If the cables are laid too shallow, the potential future uses of this land will be significantly restricted, and the land could be sterilised entirely.	<p>The Applicants and Blackpool Airport have been in detailed discussions and negotiations regarding the works on Blackpool Airport's operational land for many months. The key principle that the Airport requires to underpin the design of the Projects works is that Blackpool Airport are able to ensure the continued safe, efficient and uninterrupted operation of the Airport.</p> <p>The target burial depth of the onshore export cables through the Airport is one of the matters currently under discussion with Blackpool Airport. The cable depths will align with those presented in the Volume 1, Chapter 3: Project Description of the ES (F1.3/F03) depending on the installation technique. The Applicants would note that the land to the south of the main runway is already effectively sterilised for use due to the height restrictions associated with the safeguarding requirements of the main runway. The Applicants are confident that any concerns Blackpool Council may have regarding land sterilisation can be managed through the land agreements currently under negotiation.</p>

Reference	Written Representation Comment	Applicants' response
REP1-070 070.7	9. Inclusion of the main airport runway in the DCO redline boundary should be removed by submission of a request for an amendment to the Examination Authority. Any impact to the operations of Blackpool Airport operations are unable to be funded by the Council.	<p>The Applicants and Blackpool Airport have been in detailed discussions and negotiations regarding the works on Blackpool Airport's operational land for many months. The key principle that the Airport requires to underpin the design of the Projects works is that Blackpool Airport are able to ensure the continued safe, efficient and uninterrupted operation of the Airport.</p> <p>The construction techniques to be used, and their associated spatial extent within Blackpool Airport, are matters currently under discussion with Blackpool Airport. The Applicants are confident that through those discussions the concerns raised can be addressed in full during the Examination.</p>
REP1-070 070.8	<p><u>Extent of rights sought over Council owned land</u></p> <p>10. Guidance requires the Applicant to show certainty and necessity as to intended use of the land for the project and associated rights sought to be acquired, as sufficient to justify the interference of human rights in contravention of Article 1.</p> <p>11. The Council considers that the Application does not demonstrate rights sought to be acquired are justified to meet the requisite tests of necessity, certainty, and proportionality. Particularly with respect to the Starr Gate accessway, and interference with the runway at Blackpool Airport as being reasonably required to deliver the Scheme. The tests under the Planning Act 2008 have not been met.</p> <p>12. The compelling benefit in the public interest of the interference with the public accessway from Starr Gate and interference of the operations at the Blackpool Airport is not proven. The lack of detail as to the need for the rights sought (both in scope and duration) also means there is insufficient certainty that the rights sought are required for the proposed development.</p>	<p>The Applicants refer BBC to the explanation provided at CAH 1 and summarised in their hearing summary [REP1-036] where they explained in detail how their approach to seeking compulsory acquisition of rights and land for the Transmission Assets meets the tests in s122 of the Planning Act and the relevant 'Guidance related to procedures for the compulsory acquisition of land' (Sept 2013). The Applicants also refer to their response at CAH1_2 of the Applicants' response to Hearing Action Points at Deadline 1 (REP1-037) which further explains how all reasonable alternative to compulsory acquisition have been explored in accordance with the relevant Guidance. This is also set out in the Statement of Reasons [REP1-012], and the Book of Reference [REP1-014], where the specific rights sought for each plot of land are identified based upon the Applicants' objective of seeking to reduce the impact on affected parties and only included the permanent acquisition of land or rights in land where temporary powers are not adequate. In addition, where rights are sought these are the least intrusive to ensure the cables are protected and can be suitably maintained. The Applicants maintain that the land and rights over land which are included within the scope of the draft Development Consent Order are necessary and proportionate in order to deliver the Transmission Assets.</p> <p>In respect of Starr Gate (Plots 2-007 – 2-0012 on the Land Plan (REP1-004)), the Applicants are only seeking temporary powers to access the land during construction works and have confirmed to BBC (and the RNLI) that this will be infrequently used and access would only be required by light vehicles to launch small vessels during landfall construction activities (see ISH 1_15 5(a)(ii) from</p>

Reference	Written Representation Comment	Applicants' response
		<p>(REP1-037). As set out in that response the outline Construction Traffic Management Plan has been updated and provided to BBC and secures the necessary mitigation to ensure the Applicants use does not unnecessarily interfere with the use by others.</p> <p>In respect of Blackpool Airport, the Applicants have sought to locate the Order Limits away from the main operational runway as far as reasonably practicable, and as the Council is aware, have been in detailed discussions with Blackpool Airport for many months to ensure consultation feedback has been incorporated into the site selection process as detailed in REP1-070 070.2 and REP1-070 070.3 above.</p> <p>The Applicants consider that the limited scale and nature of the interference with Starr Gate, and the fact that any works within Blackpool Airport will be agreed with the Operator means that all reasonable steps have been taken to ensure the public interest in the delivery of almost 2GW of new renewable capacity from the Morgan and Morecambe Generation Projects more than outweighs the necessary limited use of Starr Gate and the temporary construction impacts at Blackpool Airport.</p>
REP1-070 070.9	<p><u>Drainage infrastructure:</u></p> <p>13. The Council is not the local flood authority for the majority of the land within the proposed order limits. However, The Council owns drainage infrastructure within and adjacent to the order limits, which may be affected by works and hydrological impacts of the proposed development. The direction of flow for the existing airport / main runway surface water drainage is east towards the Queensway to main river before crossing Queensway to join the main Moss Sluice system.</p> <p>14. Drainage channels are the responsibility of riparian owners to maintain. The local context is such that the main river which takes away storm water, located to the south of the River Ribble, is at capacity with a shallow gradient and subject to tidal influence and prone to localised flooding. Therefore development on the EZ at Eastern gateway is subject to</p>	<p>The Applicants note the Council's comment regarding the capacity of the local river system and the restrictions on surface water discharge from the EZ to greenfield runoff rates. The Applicants also note the Council's concern that changes to the drainage ecosystem will increase the overall discharge to the existing system will increase localised flooding.</p> <p>The Applicants confirm that surface water runoff from the construction of the Transmission Assets will be managed in accordance with the Surface and Groundwater Management Plan (APP-202). The Surface and Groundwater Management Plan forms part of the Code of Construction Practice and is secured in Requirement 8 Schedule 2A and 2B of the draft DCO (C1/F04). The Surface and Groundwater Management Plan sets out measures to manage surface water runoff and site drainage from the construction works to avoid increasing the flood risk elsewhere.</p>

Reference	Written Representation Comment	Applicants' response
	<p>provisions restricting surface water discharge to greenfield run off rates necessitating extensive on site attenuation.</p> <p>15.Changes to the drainage eco-system which increase overall discharge to the existing system or interrupted flows and increased localised flooding would have a significant impact on the airport, the EZ and surrounding residential and agricultural property. The Southern area of the airport identified for the solar farm and the Transmission route is poorly drained with a high water table and subject to local flooding with run off of storm water and investment required to improve existing field drainage. These drainage systems may easily be impacted by the transmission routes – with onsite attenuation potentially required to prevent further overloading of the eastward flowing drainage system.</p> <p>16. The drainage system located within the Airport land is prone to sand infiltration requiring regular cleaning to maintain flow capacities and prevent localised flooding and standing water. The additional problem to the Airport operations is unwanted bird activity attracted to any standing water. Any construction impacts on the existing drainage system would be problematic, and may result in a partial closure / temporary restriction of Airport operations.</p>	
REP1-070 070.10	<p>Review of the Applicants' response to the Council's Relevant Representation</p> <p>17. The Applicants' response to the Council's Relevant Representation overstates engagement with the Council. The Council welcomes meetings which have arisen as a result of the Hearings attendance and look forward to future proactive engagement.</p>	<p>The Applicants welcome meetings that have arisen as a result of the Hearings attendance and look forward to proactive engagement. The Applicants can confirm that a draft Statement of Common Ground has been provided to Blackpool Borough Council in advance of technical meetings to seek agreement on ongoing points of discussion. An agreement has been reached with the Council that the draft SoCG will be submitted at Deadline 3.</p>

2.2 Canal & River Trust

Table 2.2: REP1-074 – Canal & River Trust

Reference	Written Representation Comment	Applicants' response
REP1-074 074.1	<p>Dear Sir/Madam,</p> <p>Proposal: Application by Morgan Offshore Wind Limited and Morecambe Offshore Windfarm Limited for an Order Granting Development Consent for the Morgan and Morecambe Offshore Wind Farms Transmission Assets (“the Application”)</p> <p>Canal & River Trust (the Trust) Submission for Deadline One, (Unique Reference: 20053937).</p> <p>Further to your Rule 8 letter and following the publication of the Examining Authority's (ExA's) timetable, please find attached:</p> <ul style="list-style-type: none"> The Trust's preferred Protective Provisions provided to the applicant on 29th January 2025 (Appendix A) <p>In addition, below, is an update on the Trust's latest position in relation to the examination, with headings to identify the various elements in relation to Deadline One (DL1), including update on the Trust's draft Statement of Common Ground (SOCG) with the applicant; on proposed Protective Provisions for the benefit of the Trust; and on progress made on negotiating an agreement in terms of the acquisition and/or use of land occupied by the Trust.</p>	The Applicants note this response.
REP1-074 074.2	<p><u>Trust's Role as an Interested Party</u></p> <p>The Trust responded on 27th January 2025 to register and comment as an Interested Party for the Examination relating to the Morgan and Morecambe Offshore Wind Farms Transmission Assets and made Relevant Representations. The Trust provided a summary of the</p>	The Applicants acknowledge the Canal and River Trust's (the Trust) position as an Interested Party and welcome the Trust's ongoing engagement with the Application.

Reference	Written Representation Comment	Applicants' response
	Relevant Representations at Deadline A, which set out our concerns raised at that stage. The Trust had registered to attend and speak at the ISH1 on 30th April and CAH1 on 2nd May, however following progress made with the applicant on the days preceding the hearings we were able to notify the ExA's that we would no longer need to attend to make oral submissions at either hearing.	
REP1-074 074.3	<u>Statement of Common Ground</u> At this stage negotiations have not commenced in relation to a draft SoCG with the applicant. Given progress made on addressing the Trusts concerns it may be the case that a SoCG will not be required.	The Applicants also consider that good progress has been made to date with the Trust and do not consider that a Statement of Common Ground will be required.
REP1-074 074.4	<u>Further Compulsory Acquisition Hearing</u> As explained in our relevant representation summary (submitted at Deadline A), the Trust have lease holder right on land that may be affected by the Application, namely related to Works 25A and 25B. Ahead of the CAH1 on 2nd May the applicant explained its general expectation that negotiations with leaseholders would flow from negotiations completed with freeholders. However, the applicant identified the need to engage with the Trust about its leasehold interests early and its land agents (Dalcour Maclaren) made direct contact on 29th April 2025 and advised that they would be in contact in the coming weeks to provide Head of Terms following a review of the lease. They advised that negotiations with the freeholder of the land, Tallentine Limited, had been ongoing since November 2024. On the basis of this correspondence from Dalcour Maclaren, the Trust were content to allow these to negotiation to progress and no longer needed to attend CAH1. We did however reserve our position to attend future CAH if required.	The Applicants issued heads of terms to the Trust on the 21 st May 2025 following redrafting to account for comments made by the land agent group and the discussions with the freeholder. The Applicants welcome the engagement and negotiation on the terms and hope to make progress on the voluntary agreement for the land rights sought in the coming weeks.

Reference	Written Representation Comment	Applicants' response
	<p>To date no further contact or correspondence has been received from the applicant in relation to these land negotiations. The Trust sent a chasing email on 16th May 2025 to the applicant's land agent seeking an update on when discussion may commence with the Trust. Given the current position in relation to this matter, the Trust intends, at this stage, to speak at the next Compulsory Acquisition Hearing.</p> <p>The Trust will update the ExA on the progress made in relation to this matter at each relevant deadline.</p>	
REP1-074 074.5	<p><u>Hearing(s)</u></p> <p>The Trust notes that the ExA may choose to hold further Hearing(s) about specific topics that may need to be explored orally. The Trust should be available to attend these, should the ExA consider it necessary.</p>	The Applicants note this response.
REP1-074 074.6	<p><u>Protective Provisions for the Trust</u></p> <p>The draft DCO, as submitted, did not contain any specific protective provisions (PP's) for the Trust as a statutory undertaker. The Trust provided the applicant its preferred protective provisions on 29th January 2025 (Appendix A). As set out in our summary Relevant Representation submitted at Deadline A, these draft protective provisions provided to the applicant are based on the DCO made for Keadby 3 (SI 2022/1396) and similar have been recently included in the Cottam (SI 2024/943) & Gate Burton (SI 2024/807) Solar NSIPs, where the proposed developments affecting the Trust's asset is an underground electricity cable.</p> <p>We are pleased to advise that since then progress has been made on negotiation with the applicant on PP's for the Trust to be included within the DCO. The Trust provided an updated draft of the PPs to the applicant on 24</p>	<p>The Applicants welcome the comments made by the Trust regarding progress made on the negotiation of protective provisions.</p> <p>The Applicants provided a set of protective provisions for the Trust in the draft Development Consent Order (DCO) at Deadline 1 (REP1-008).</p> <p>As confirmed in Part 2 of the Land Rights Tracker (REP1-065), the Applicants are confident that the protective provisions can be agreed before the close of examination.</p>

Reference	Written Representation Comment	Applicants' response
	<p>April 2025. The applicant in turn provided an updated version on 14th May 2025 responding to and resolving some of the comments. The Trust are currently awaiting further comments from the applicant. Whilst some matters remaining outstanding for further discussion, the parties have become more closely aligned and remain confident that these PPs can be agreed before close of the examination.</p> <p>It is understood that the applicant will include PPs for the Trust in the next updated draft DCO to be submitted at Deadline 1 to reflect the progress of negotiations, though these have not been agreed by the Trust.</p> <p>The Trust will update the ExA on the progress made in relation to the protective provisions and other matters at each relevant deadline.</p>	
REP1-074 074.7	<p><u>Site Inspections</u></p> <p>The Trust have no suggested locations for the ExA site inspections. The Trust do not wish to attend an accompanied site inspection.</p> <p><u>Future correspondence</u></p> <p>The Trust would welcome all future correspondence to be received electronically to the following email address: NationalPlanning.Function@canalrivertrust.org.uk</p> <p>Please do not hesitate to contact me with any queries you may have.</p> <p>Yours sincerely, [redacted] Senior Planner – Major Projects & Infrastructure</p>	The Applicants note this response.

2.3 Defence Infrastructure Organisation

Table 2.3: REP1-075 –Defence Infrastructure Organisation

Reference	Written Representation Comment	Applicants' response
REP1-075 75.1	<p>Introduction</p> <p>Thank you for consulting the Ministry of Defence (MOD) on the above proposed development.</p> <p>The Defence Infrastructure Organisation (DIO) Safeguarding Team represents the Ministry of Defence (MOD) as a consultee in UK planning and energy consenting systems to ensure that development does not compromise or degrade the operation of defence sites such as aerodromes, explosives storage sites, air weapon ranges, and technical sites or training resources such as the Military Low Flying System.</p> <p>The applicant seeks an Order granting Development Consent for assets that would transmit the electricity generated by both the Morgan and Morecambe Offshore Wind Farms to a grid connection at the existing Penwortham Substation. The proposed Transmission Assets (TAs) include:</p> <ul style="list-style-type: none"> • the installation of up to 484km of offshore export cables, • a landfall site where offshore cables would be linked to onshore cables; • the installation of up to 17km of onshore export cables; • two new substations (one each for Morgan Offshore Wind Farm and Morecambe Offshore Wind Farm) with both situated North-east of Hall Cross and West of Newton-le-Scales; and 	<p>The Applicants acknowledge DIO's position on Warton Aerodrome and welcome the ongoing engagement with BAE Systems on behalf of Warton Aerodrome through the Statement of Common Ground process and associated technical meetings that have taken place since Deadline 1 ((see the Applicants' response to WR of BAE System in Table 2.15 below).</p>

Reference	Written Representation Comment	Applicants' response
	<ul style="list-style-type: none"> biodiversity and environmental enhancements across seven sites. <p>The application site/development corridor occupies statutory safeguarding zones surrounding and associated with Warton Aerodrome, an aerodrome used by both military and civilian aircraft. At its closest point the application site/development corridor is within 1.7km of the aerodrome boundary. The application site/development corridor is within/passes through safeguarding zones designated to preserve the operation and capability of the aerodrome by requiring consultation where development would introduce environments that may support or attract those large and/or flocking bird species hazardous to aviation safety, where development reaches or exceeds certain heights above ground level, and where development by virtue of its location, nature, scale, massing, or external materials has the potential to degrade the operation and/or capability of technical assets which facilitate air traffic management.</p>	
REP1-075 75.2	<p>Birdstrike</p> <p>The application site is within a zone where the potential for a development to provide a habitat or other environment attractive to large and/or flocking bird species is of particular concern. The proposed application site/development corridor, specifically the proposed sub stations and associated environmental mitigation and biodiversity benefit areas, has the potential to attract or support hazardous bird species within an area where aircraft are at critical stages of flight resulting in a reduction to aviation safety.</p> <p>The applicant's submission identifies that, close to each of the two proposed new onshore substations,</p>	<p>The Applicants have committed to working with BAE Systems as aerodrome operator to review and update the existing Bird Strike Risk Assessment that is currently in place at the aerodrome (as per the requirements of CAP 772 Wildlife hazard management at aerodromes) to ensure that, in the unlikely event there would be any changes in bird strike risk as a consequence of the Transmission Assets mitigation, the existing technical mitigation solutions remain appropriate. This commitment is explained within the Strategy for Wildlife Hazard Management Plan (S_D2_14)) submitted at Deadline 2 and has been sent to BAE and Blackpool Airport. This would ensure that the Transmission Assets would not result in the degradation of aviation safety at Warton Aerodrome.</p> <p>The proposed waterbodies have been carefully evaluated as part of their site selection, and while they are situated in an area of concern for bird activity, effective measures will be implemented to deter large and flocking bird species</p>

Reference	Written Representation Comment	Applicants' response
	<p>new waterbodies are to be created which would replace a number of existing smaller ponds. The waterbody proposed close to the Morgan onshore substation would result in the creation of a significantly larger area of open water which would be more attractive to both waterfowl and gulls than the existing smaller waterbodies. This larger waterbody has the potential to attract large and/or flocking bird species from the River Ribble and the Ribble Estuary which may result in the movement of birds across the aerodrome as well as through airspace where aircraft from take-off and/or to land at Warton Aerodrome. The creation of such a waterbody close to the aerodrome would, without the provision of details necessary to assess the potential to form an attractant (specifically relating to the form, operation, and maintenance of the waterbody), be considered unacceptable. Given the proximity of the development corridor to Warton Aerodrome and the potential for the development to result in the degradation of aviation safety the MOD must, at this time, object to the proposal.</p>	<p>from congregating near them, to be secured via engagement and agreement on the outline Wildlife Hazard Management Plan. Additionally, ongoing monitoring and maintenance will ensure that these measures remain effective over time, further safeguarding aviation safety while promoting biodiversity in the region.</p> <p>The Applicants have also committed to updating the outline Ecological Management Plan (J6/F02) to provide further detail on the design and habitat mitigation measures that are proposed for each of the environmental mitigation and biodiversity benefit areas. This will include the specific features provided for the displaced target species and will also consider where other species may be attracted and how this will affect wildlife movement patterns and subsequent wildlife attractant habitats risk assessment in response. Where possible, this will be based on case studies and evidence from other projects. Where appropriate, indicative locations of specific features will be identified. Information will also be provided on the ongoing management measures that will be implemented during the construction and operation of the Transmission Assets (e.g. cutting rotations) following the identification of any elevated bird strike risk (CAP 772 Chapter 4 – Risk Identification). The measures will take into account the guidance within CAP 772 Wildlife hazard management at aerodromes (CAA, 2017) Chapter 5 – Habitat Management). This information will be provided to Natural England, BAE Systems and Blackpool Airport. This commitment is explained within the Strategy for Wildlife Hazard Management Plan (S_D2_14)) submitted at Deadline 2 and has been sent to BAE and Blackpool Airport. Blackpool Airport and BAE provided comment on the strategy and amendments have been incorporated into the version submitted into Examination.</p>
REP1-075 75.3	<p>It should be noted that this objection may be addressed through the submission of additional data which sets out the following:</p> <ul style="list-style-type: none"> specifics for each of the proposed waterbodies to include location and site plans, section plans which clearly show bank profile and water level (taking into account 1:30 and 1:100 storm events); 	<p>The Applicants note the DIO's comments in relation to the specific detail of the proposed waterbodies and hedgerow creation. As noted above, the Applicants have also committed to updating the outline Ecological Management Plan (J6/F02) to provide further detail on the design and habitat mitigation measures that are proposed for each of the environmental mitigation and biodiversity benefit areas (which will include the ponds and hedgerows). This will include the specific features provided for the displaced target species and will also consider where</p>

Reference	Written Representation Comment	Applicants' response
	<ul style="list-style-type: none"> where waterbodies are designed to drain to dry, details of the drain to dry time given storm events (1:30 and 1:100); and proposed maintenance measures and schedules to ensure any designed drain to dry time does not increase. <p>Across the wider development corridor hedgerow, scrub, and woodland planting are proposed. Extensive planting of species with high proportions of fruit, berry, and hip bearing plants may result in a significant increase in availability of these food sources for hazardous flocking birds, including Starlings, winter thrushes and Wood Pigeon. In addition, the management of soil as may be produced through the installation of cables has the capacity to provide a food source for hazardous flocking bird species. The proximity of these potential food sources/feeding habitat to Warton Aerodrome have the potential to attract hazardous bird flocking species resulting in the detriment of aviation safety.</p> <p>It is noted that the applicant's draft Development Consent Order (September 2024) makes provisions for the submission and approval of a written landscaping scheme (Schedule 2A, Requirement 6 and Schedule 2B, Requirement 6), and for the submission and approval of a Code of Construction Practice, which identifies a requirement for a soil management plan (Schedule 2A, Requirement 8 and Schedule 2B, Requirement 8), which would address these concerns. To ensure that appropriate assessments can be completed, the MOD should be identified as consultee for each of these requirements.</p>	<p>other species may be attracted and how this will affect wildlife movement patterns and subsequent wildlife attractant habitats risk assessment in response.</p> <p>The Applicants do not consider that the projects will increase or alter the risk posed by bird strike to aircraft operating out of Warton Aerodrome or that the projects will create an increased risk to public safety. The Applicants are committed to working with BAE and other stakeholders (including Blackpool Airport) to ensure that stakeholders are confident in the Applicants' assessment conclusions and that Warton Aerodrome's existing safeguarding systems and wildlife management plan (required under CAP 772) can continue to be complied with. The Applicants have engaged with BAE on behalf of Warton Aerodrome on a strategy for preparing an outline Wildlife Hazard Management plan for the Transmission Assets. This commitment is explained within the Strategy for Wildlife Hazard Management Plan (S_D2_14) submitted at Deadline 2 and has been sent to BAE.</p> <p>An outline of the proposed steps was discussed with BAE on 19th May, and the Strategy for Wildlife Hazard Management Plan (S_D2_14) was sent to BAE on 29th May. The document outlines the steps that the Applicants are proposing to undertake to work with BAE. Comments were received from BAE and amendments were made accordingly. A further technical meeting is currently being arranged.</p> <p>It is the Applicants' position that the existing Bird Strike Risk Assessment that is currently in place at Warton Aerodrome (as per the requirements of CAP 772 Wildlife hazard management at aerodromes) would be updated to ensure that, in the unlikely event there would be any changes in bird strike risk as a consequence of the Transmission Assets mitigation, the existing technical mitigation solutions remain appropriate. This would ensure that BAE remain in control of the Bird Strike Risk Assessment, but the Applicants would be required to provide relevant information to inform this through (i) an agreed approach to monitoring and (ii) evidence on the likely additional attraction, if any, of birds to the wildlife zone. The principles of this approach have been agreed with Blackpool Airport as a robust approach in respect of their concerns on bird strike and will be further discussed at the next technical meeting with BAE.</p>

Reference	Written Representation Comment	Applicants' response
		<p>The update and implementation of any such additional work would be at the cost of the Applicants.</p> <p>The Applicants strongly believe that management of bird strike risk is achievable, as demonstrated by the ongoing management undertaken by Warton Aerodrome under their existing Wildlife Hazard Management Plan.</p> <p>Following discussion with aviation stakeholders, the Applicants have updated Requirements 8, 10 and 12 of the draft DCO (C1/F04) submitted at Deadline 2 to include BAE as a named consultee. Relevant updates to the related outline management plans will be submitted at Deadline 3.</p> <p>The Applicants do not believe it is necessary to add the MOD as a consultee for Requirement 6. The outline wildlife hazard management plan will form the basis of bespoke wildlife hazard management plans to be secured for BAE (on behalf of Warton Aerodrome) as part of the discharge of Requirement 12 post-consent. This will allow Warton Aerodrome to absorb the Transmission Assets wildlife hazard management plans into their existing plans.</p>
REP1-075 75.4	<p>Aerodrome Height</p> <p>The proposed development site occupies statutory safeguarding zones designed to preserve aviation safety by ensuring that the three-dimensional air space above and surrounding an aerodrome is kept free of obstacles. This three-dimensional airspace is defined by a series of obstacle limitation surfaces, drawn using aerodrome data including runway dimensions, which allow the height of proposed development to be assessed to see whether it would reduce aviation safety by forming an obstacle to aircraft operating from and/or around that aerodrome.</p> <p>Whilst the majority of the development proposed would be unlikely to have any significant impact on these obstacle limitation surfaces, there are elements,</p>	<p>The Applicants welcome this representation and have been in dialogue with BAE Systems regarding the safeguarding requirements and are committed to providing the appropriate information to ensure BAE is satisfied that the Transmission Assets do not affect the safe operation and development of Warton Aerodrome in relation to OLS and IFP. The Applicants will proactively assist in the provision of information should BAE Systems wish to undertake their own assessment and consider that this can be resolved alongside the Examination.</p> <p>BAE Systems will be in a position to gain the required assurances via the Safety Management System when further detail is provided by the Applicants regarding above surface infrastructure works such as site, positioning and, height data. The Applicants have committed to working collaboratively with BAE Systems to dynamically manage / control crane positioning and heights, where/if required.</p> <p>The Applicants agree that the potential for the lightning protection masts, comparable to the existing intervening and surrounding built environment (including existing electrical cable pylons), to introduce an obstacle to aircraft may be addressed by supplementing the wording of the requirement with a stipulation</p>

Reference	Written Representation Comment	Applicants' response
	<p>specifically the lightning protection masts detailed at paragraph 1.2.2.18 in the Outline Landscape Management Plan (Document Ref: J2 Rev: F01 dated September 2024), that may result in the introduction of obstructions that penetrate obstacle limitation surfaces degrading aviation safety for those aircraft arriving at, or departing from, Warton Aerodrome.</p> <p>This impact may be addressed by the submission of additional data, specifically the location and height above ground level of these elements of the development. It is likely that the MOD would require that obstacles are fitted with aviation safety lighting and the submission of sufficient information to ensure obstacles can be appropriately charted in order to address these concerns.</p> <p>It is acknowledged that the applicant's draft Development Consent Order (September 2024) contains requirements for the submission of Detailed Design Parameters (Schedule 2A, Requirement 5 and Schedule 2B, Requirement 5) however the submission of details of the potentially harmful element, the lightning protection masts is not necessitated by the wording proposed. The potential for the lightning protection masts to introduce an obstacle to aircraft may be addressed by supplementing the wording of the requirement with a stipulation that details of the locations and maximum heights of all structures/elements with a maximum height of, or exceeding, 15.2m above ground level should form part of the Detailed Design Parameters and identifying that</p>	<p>that details of the locations and maximum heights of all structures/elements with a maximum height of, or exceeding, 30 m above finished ground level (as the maximum height of lightning protection masts) should form part of the detailed Design Parameters. And regarding obstacle safeguarding, it is acknowledged that the MOD is a consultee for the purpose of this requirement. The Applicants stated during Issue Specific Hearing 1 (para 112 of ID 5(a)(vii) Agenda Item vii. Proposed substation that in response to a clarificatory question from BAE Systems, Requirement 5(a) of the draft DCO should specify the height of the onshore substation buildings as 'above finished ground level' and the Applicants will be correcting this in the next version of the draft DCO and ensure the draft DCO and Project Description (AS-024) parameters align.</p> <p>This data will also allow BAE Systems to ensure obstacles can be appropriately charted in order to address these concerns, noting that existing overhead line pylons are in proximity to the proposed onshore substation locations and they are of greater height (42 m) than the lightning protection masts for the onshore substations..</p>

Reference	Written Representation Comment	Applicants' response
	<p>the MOD is a consultee for the purpose of this requirement.</p> <p>In addition to the completed development introducing an obstacle to aircraft, the implementation of a development of this type may require the use of tall construction equipment or plant such as cranes. The deployment of plant or equipment which has a height of, or exceeding, a height of 15.2m above ground level would introduce obstacles that may degrade aviation safety. This impact may be addressed by adding a requirement for a Construction Environment Management Plan which identifies the plant/equipment proposed to be deployed, the periods for which it would be present in given development areas, and the lighting that would be displayed on it. The MOD should be identified as a consultee for the purposes of that requirement.</p>	
REP1-075 75.5	<p>Technical</p> <p>The application site also falls within safeguarding zones defining areas where the height of a given development, the materials used in its construction, and introduction of sources of electro-magnetic fields/interference may impact on the operation of technical assets deployed at Warton Aerodrome. These technical assets may include surveillance equipment such as radars, navigational equipment such as Instrument Landing Systems and Precision Approach Radars, communication equipment, and other types of technical installations supporting operational defence or national security requirements.</p>	<p>The Applicants welcome this representation and the confirmation that the MOD has no technical safeguarding objections to the development.</p>

Reference	Written Representation Comment	Applicants' response
	After reviewing the plans and documentation provided in the application the MOD have no technical safeguarding objections to the application development.	
REP1-075 75.6	Offshore Export Cable Route and Landfall After reviewing the plans and documentation provided in the application and received from the applicant the MOD have no safeguarding objection to the offshore export cable route and landfall aspects of this application.	The Applicants note that the MOD have no safeguarding objection to the offshore export cable route and landfall aspects of the Application.
REP1-075 75.7	Summary The MOD must object to this application on the grounds that insufficient information is currently available to allow necessary assessments to be completed for the potential for the development to result in an increased risk of birdstrike and degradation of aviation safety. The MOD must emphasise that the advice provided within this letter is in response to the data and information detailed in the developer's documents titled "Environmental Statement, Volume 1, Chapter 3: Project Description (Rev: ES01, dated December 2024)", "Environmental Statement, Volume 3, Chapter 11: Aviation and Radar (Rev ES Issue, dated September 2024)", Outline Ecological Management Plan (Rev: F01, dated September 2024)" and "Onshore Biodiversity Benefit Statement (Rev F02, dated December 2024)". Any variation of the parameters (which include the location, dimensions, form, and finishing materials) detailed may significantly	The Applicants acknowledge the submission by the MOD and Warton Aerodrome's position but note that there is ongoing engagement through the Statement of Common Ground process with BAE Systems on behalf of Warton Aerodrome and associated technical meetings to resolve matters raised in relation to risk of birdstrike and aviation safety. The Applicants are confident these matters can be resolved.

Reference	Written Representation Comment	Applicants' response
	<p>alter how the development relates to MOD safeguarding requirements and cause adverse impacts to safeguarded defence assets or capabilities. In the event that any amendment, whether considered material or not by the determining authority, is submitted for approval, the MOD should be consulted and provided with adequate time to carry out assessments and provide a formal response.</p>	

2.4 Environment Agency

Table 2.4: REP1-076 –Environment Agency

Reference	Written Representation Comment	Applicants' response
REP1-076 076.1	<p>Dear Sir</p> <p>DEADLINE 1 - WRITTEN REPRESENTATIONS.</p> <p>We submitted our Relevant Representation (RR) [RR-677] dated 27/01/2025. The applicant provided a response to these representations in the subsequent document [PDA-010] <i>Procedural deadline A Submission - Annex 3.2.3 Response to RR- Environment Agency (RR677)</i></p> <p>The Written Representations presented below have been made in response to [PDA-010].</p>	The Applicants thank the Environment Agency for their Written Representations and have responded below.
REP1-076 076.2	<p>Environment Agency position</p> <p>Overall we are satisfied that we are in continuing productive discussions with the Applicant and that progress is being made across all the issues raised in RR-677.</p>	The Applicants thank the Environment Agency for their engagement and advice throughout the pre-application and examination stages of the Transmission Assets.
	Regarding Ecology – There is on-going discussion to ensure future engagement with the Environment Agency is secured regarding other mitigation measures; other habitat creation and wetland habitat creation.	The Applicants refer to the response to REP1-076 076.5 below.
	Regarding Flood Risk – There is on-going discussion to ensure that there is adequate consultation through the use of Protective Provisions and the disapplication of FRAPS, for works affecting main river or in the floodplain. Also to ensure that temporary storage of soil does not divert or obstruct the movement of floodwaters.	The Applicants refer to the response to REP1-076 076.6 below.
	Regarding Geology, hydrogeology and ground conditions – There is on-going discussion to ensure that future engagement with the Environment Agency is secured regarding the required	The Applicants refer to the response to REP1-076 076.7 below.

Reference	Written Representation Comment	Applicants' response
	Hydrogeological Risk Assessment(s) and Foundation Works Risk Assessment(s) to protect ground water resources and groundwater dependant terrestrial ecosystems.	
	Regarding Consultation Timescales - We maintain our position that the Environment Agency requires 21 days to review consultations on matters specified in requirements.	The Applicants refer to the response to REP1-076 076.9 below.
REP1-076 076.3	Detailed Responses. Our detailed responses to each point raised in [PDA-010] are set out below.	The Applicants note the Environment Agency's comments and have provided responses to each point raised by the Environment Agency below.
REP1-076 076.4	0677.1 Ecology: Potential impact of EMF on fish <u>This Ref. can be closed.</u> We are satisfied with the conclusion that the depth of cable burial below the River Ribble of 7-45m will mean that EMF will be negligible at the riverbed and therefore no impact on fish.	The Applicants note that the Environment Agency are now satisfied that there will be no potential impacts of EMF on fish.
REP1-076 076.5	0677.2 Ecology EA consultation regarding outstanding Biodiversity issues: • detailed Biosecurity Plan • water vole surveys • mitigation measures for otters • Habitat creation and improvement proposals at Lea Marsh Fields and Dow Brook. <ul style="list-style-type: none"> • Biosecurity Plan – This can be closed. We are satisfied that we will consult on the detailed Biosecurity Plan under Requirement 8 of the dDCO [APP-005], to be approved in consultation with the Environment Agency. • Water voles – This can be closed. We are satisfied with the response. See Ref 0677.12 	The Applicants note that the Environment Agency's concerns have been addressed in respect of the Biosecurity Plan and water voles.
	<ul style="list-style-type: none"> • Mitigation for otters - On-going discussion. This will be covered under the Ecological Management Plan, 	The Applicants confirm that the Environment Agency are included as a named consultee in Requirement 12 of the draft DCO (C1/F04) submitted at Deadline 2.

Reference	Written Representation Comment	Applicants' response
	Requirement 12, for which the EA requests to be added as consultee.	
	<ul style="list-style-type: none"> Habitat creation for otter – On-going discussion. This will be detailed in the Biosecurity Benefit Statement for which the EA requests to be added as consultee. 	As set out in the Onshore Biodiversity Benefit Statement (J11/F03), the habitat creation for otter at Lea Marsh Fields is a voluntary commitment being made by the Applicants. However, the Applicants note the Environment Agency's wish to be consulted regarding the biodiversity benefit proposals post consent.
REP1-076 076.6	<p>0677.3</p> <p>Flood Risk EA requests early involvement in detailed project design</p> <p>This matter is on-going. To ensure there is adequate consultation through the use of Protective Provisions and the disapplication of FRAPS.</p>	<p>The Applicants confirm that there are on-going discussions in relation to the protective provisions for the Environment Agency included in Part 9, Schedule 10 of the draft DCO (document reference C1/F04). The protective provisions ensure ongoing consultation with the Environment Agency through the detailed design stage as it notes where the Environment Agency must be consulted on plans and details of works carried out by the Applicants. As set out in Part 2 of the Land Rights Tracker (REP1-065), the Applicants are awaiting further comments from the Environment Agency. The Applicants are confident the protective provisions for the Environment Agency will be agreed before the end of Examination.</p> <p>In line with discussions with the Environment Agency, the Applicants will be providing additional information to the Environment Agency at Deadline 3 to support ongoing dialogue for the disapplication of FRAPS. This includes a list of requirements for standard FRAP application to be included in Protective Provision.</p>
REP1-076 076.7	<p>0677.4</p> <p>Geology • Hydrogeological Risk Assessment required. • Foundation Works Risk Assessment required.</p> <p>This matter is on-going.</p> <ul style="list-style-type: none"> Hydrogeological risk assessment (HyRA) for all HDD or any other trenchless utility installation methods is proposed to be secured through Requirement 8. We are satisfied with this approach, but for clarity, a hydrogeological risk assessment must be listed under sub-paragraph (2) of Requirement 8 of the dDCO [APP-005]. An outline Hydrogeological risk 	<p>The Applicants confirm that it will be submitting an outline hydrogeological risk assessment for the trenchless cable installation beneath Lytham St Annes SSSI at Deadline 3 and Requirement 8 of the draft DCO (C1/F04) has been updated to include the provision of a hydrogeological risk assessment at sub-paragraph (2).</p> <p>The Applicants are progressing the outline hydrogeological risk assessment to support ongoing dialogue with the EA on the impact of trenchless installation beneath Lytham St Annes SSSI. The Applicants have requested a meeting with the Environmental Agency to share and discuss the outcome of this work in advance of submission at Deadline 3.</p>

Reference	Written Representation Comment	Applicants' response
	assessment should be provided in support of the Outline CoCP [APP-193]	
	<p>The EA has requested a plan to show the maximum design scenarios for the dewatering and Transition joint bays to show location of the entry pits, the depth of dewatering and the period over which the dewatering would take place.</p> <ul style="list-style-type: none"> A Foundation Works Risk Assessment is proposed to be secured through Requirement 8. We are satisfied with this approach, but for clarity, a Foundation Works risk assessment must be listed under sub-paragraph (2) of Requirement 8 of the dDCO [APP-005]. 	<p>The Applicants have made a commitment (CoT103 of Volume 1, Annex 5.3: Commitments Register (F1.5.3/F03)) to produce detailed piling risk assessment(s) where suspected contamination is present and piling is proposed. The need to prepare these assessments at specific locations will be confirmed during detailed design in consultation with the Environment Agency.</p>
REP1-076 076.8	<p>0677.5</p> <p>Amended Requirements To include consultation with the Environment Agency Requirement 4 – Substation works Requirement 6 – Landscaping Requirement 12 – Ecological Management Plan</p> <p><u>This Ref. can be closed.</u></p> <ul style="list-style-type: none"> Requirement 4 – This matter can be closed. We are satisfied with the response. Requirement 6 – This point can be closed as it is repeated under 0677.2 above. We are satisfied that our concerns regarding habitat creation for otters will be covered in the Biodiversity Benefit Statement for which the EA requests to be added as consultee. Requirement 12 – This point can be closed as it is repeated under 0677.2 above. The EA requests to be added as consultee, notably with regard to mitigation measures for otters. 	<p>The Applicants note that these matters are now closed.</p>
REP1-076	0677.6	<p>The Applicants maintain that the proposed wording, which has been added to the draft DCO (C1/F04) at Deadline 2, provides sufficient flexibility for a 21-day period</p>

Reference	Written Representation Comment	Applicants' response
076.9	<p>Amended timescales EA requires 21 days to review consultations on matters specified in requirements.</p> <p>This matter is on-going.</p> <p>We are not satisfied with the suggested wording 'or a longer period is agreed with both the undertaker and the discharging authority'.</p> <p>We maintain our position that the Environment Agency requires 21 days to review consultations on matters specified in requirements.</p>	<p>to be agreed if the nature of the documents to be consulted on means that a longer period is required.</p> <p>The current base 10-day timescale is standard and is well precedented, the Applicants would refer the Environment Agency to the Awel y Mor Development Consent Order and the Hornsea Project Four Offshore Wind Farm Development Consent Order.</p>
REP1-076 076.10	<p>0677.7</p> <p>Protective Provisions</p> <p>This matter is on-going.</p> <p>We are in on-going discussion regarding the final form of the protective provisions.</p>	<p>The Applicants confirm that there are on-going discussions in relation to the protective provisions for the Environment Agency included in Part 9, Schedule 10 of the draft DCO (C1/F04). As set out in Part 2 of the Land Rights Tracker (REP1-065), the Applicants are awaiting further comments from the Environment Agency. The Applicants are confident the protective provisions for the Environment Agency will be agreed before the end of Examination.</p>
REP1-076 076.11	<p>0677.8</p> <p>Remaining detailed points which have not been addressed</p> <p><u>This Ref can be closed.</u></p> <p>See points below.</p>	<p>The Applicants note that this reference is now closed.</p>
REP1-076 076.12	<p>0677.9</p> <p>Work Package Tracker</p> <p><u>This Ref. can be closed.</u></p> <p>The process of incorporating outstanding matters into the SoCG is on-going.</p>	<p>The Applicants note that this reference is now closed.</p>
REP1-076 076.13	<p>0677.10</p> <p>Consents Strategy</p>	<p>The Applicants note that this reference is now closed.</p>

Reference	Written Representation Comment	Applicants' response
	<p><u>This Ref can be closed.</u></p> <p>We are satisfied with the Consents and Licences document [APP-232].</p>	
REP1-076 076.14	<p>0677.11</p> <p>Invasive non-native species technical report</p> <p><u>This Ref. can be closed.</u></p> <p>We will review the errata sheet submitted at Deadline 1.</p> <p>We are satisfied that the Biosecurity protocol is listed under Requirement 8 of the dDCO [APP-005], to be approved in consultation with the Environment Agency.</p>	The Applicants note that this reference is now closed.
REP1-076 076.15	<p>0677.12</p> <p>Water vole technical report</p> <p><u>This Ref. can be closed.</u></p> <p>We are satisfied the response.</p>	The Applicants note that this reference is now closed.
REP1-076 076.16	<p>0677.13</p> <p>Outline Ecological Management Plan</p> <p><u>This Ref. can be closed.</u></p> <p>Section 1.6.4.28: This part of the Ref. can be closed. We are satisfied with the response.</p> <p>CoT128: This part of the Ref. can be closed, as it is covered under Ref.0677.4 above.</p> <p>CoT104: This part of the Ref. can be closed, as it is covered under Ref.0677.5 above.</p>	The Applicants note that this reference is now closed.
REP1-076 076.17	<p>0677.14</p> <p>Onshore Biodiversity Benefit Statement</p> <p>Section 1.5.2.8 & 1.5.3.13: The EA support any plans to improve the condition of Dow Brook and the habitat creation at</p>	The Applicants refer to the response to RR-0677 0677.5 (PDA-010). The Applicants have made a new commitment (CoT131) to a minimum of 8 m set back of all mitigation landscape planting within the onshore substation sites from Dow Brook. Volume 1, Annex 5.3: Commitments register of the ES (F1.5.3/F03) has

Reference	Written Representation Comment	Applicants' response
	<p>Lea Marsh Fields, particularly the creation of ditches. We request that we are consulted on any such proposals and Landscape Management Plan as they are developed through consultation under amended Requirement 6.</p> <p>This matter is on-going.</p> <p>Section 1.5.1.3 of the Biodiversity Benefit Statement [APP-216] states that the habitat creation and enhancement proposals remain indicative at this stage in the DCO application process, and will be based on detailed landscaping designs for the onshore substations and biodiversity benefit area at Lea Marsh Fields.</p> <p>We wish to secure consultation on these landscaping designs, specifically where they are relevant to watercourse enhancement and creation as detailed in paras 1.5.2.8 (Dow Brook) and 1.5.3.13 (Lea Marsh Fields) of the Biodiversity Benefit Statement [APP-216].</p>	<p>been updated to include this new commitment at Deadline 2. On this basis, the Applicants do not consider it necessary to consult the Environment Agency on the Landscape Management Plan and amend the Requirement 6 to include the Environment Agency as consultee, as this will avoid any impacts on Dow Brook.</p> <p>Please see response to REP1-076 076.5 above as per habitat creation within the biodiversity benefit area at Lea Marsh Fields. As set out in the Onshore Biodiversity Benefit Statement (J11/F03), the habitat creation for otter at Lea Marsh Fields is a voluntary commitment being made by the Applicants. However, the Applicants note the Environment Agency's wish to be consulted regarding the biodiversity benefit proposals post consent.</p>
REP1-076 076.18	<p>0677.15</p> <p>Otter survey technical report</p> <p><u>This Ref. can be closed.</u></p> <p>We are satisfied with the approach to pre-commencement surveying for otter.</p> <p>The Environment Agen's request to be a consultee with regards to otter mitigation measures that will form part of the Ecological Management Plan is covered in Ref. 0677.2 above.</p>	The Applicants note that this reference is now closed.
REP1-076 076.19	<p>0677.16</p> <p>Outline Pollution Prevention Plan</p> <p><u>This Ref can be closed.</u></p> <p>We are satisfied with the response.</p>	The Applicants note that this reference is now closed.

Reference	Written Representation Comment	Applicants' response
REP1-076 076.20	<p>0677.17</p> <p>Outline Dust Management Plan</p> <p>1.4.5.1 Dust suppression:</p> <p>This matter is ongoing.</p> <p>We maintain our position that para 1.4.5.1 of the outline Dust Management Plan [APP-195] should highlight that if water is obtained by local extraction, then this may require an abstraction licence. This potential need for a licence will then be identified in the detailed Dust Management Plan(s). Failure to recognise the need for an abstraction licence could result in subsequent unnecessary delays to site construction activities.</p>	<p>This is noted by the Applicants. The potential need for abstraction licences is already detailed within the Consents and licences required under other legislation document (REP1-030), and the Applicants are aware of the relevant timescales.</p>
REP1-076 076.21	<p>0677.18</p> <p>River Ribble Crossing Potential for flood risk and environmental impacts.</p> <p><u>This Ref can be closed</u></p> <p>Concerns are covered under RR-0677.3 above.</p>	<p>The Applicants note that this reference is now closed.</p>
REP1-076 076.22	<p>0677.19</p> <p>Hydrology and flood risk</p> <p>Glossary & Page 10,14</p> <p>Page 15 Row 3 column 2:</p> <p>Page 18 Row 2 column 2:</p> <p>Page 48 Row 3 column 4: minimum vertical clearances</p> <p>2.6.10.11 Page 77: flood risk impacts from temporary works</p> <p>Page 89. Hydrology and flood risk Flood warning and evacuation</p> <p>Glossary & Page 10,14:</p> <p>We await review of the errata sheet submitted at D1.</p>	<p>Glossary & Page 10,14:</p> <p>The Applicants await the Environment Agency's review of Section 1.7 of the Errata (REP1-064) submitted at Deadline 1.</p>

Reference	Written Representation Comment	Applicants' response
	We are satisfied with the explanation that the correct stand-off has been applied to Dow Brook which is fluvial within the search area for the substation.	
	Page 15 Row 3 column 2: <u>This Ref can be closed.</u> We are satisfied that the new flood risk data will be taken into account at the detailed design stage.	Page 15 Row 3 column 2: The Applicants note that this reference is now closed.
	Page 18 Row 2 column 2: <u>This can be closed.</u> We are satisfied that the design of the outfall to Dow Brook will be in consultation with the Environment Agency, secured through Requirement 20.	Page 18 Row 2 column 2: The Applicants note that this reference is now closed.
	Page 48 Row 3 column 4: We recognise that CoT10 is a commitment to maintaining a minimum 2m vertical clearance below all main rivers, secured in Requirement 8, and through Protective Provisions Schedule 10 Part 9. We are currently in discussion with the applicant to ensure that the Protective Provisions are applicable to all potential works areas where the Environment Agency would need to be consulted at the detailed design stage.	Page 48 Row 3 column 4: The Applicants confirm that there are on-going discussions in relation to the protective provisions for the Environment Agency included in Part 9, Schedule 10 of the draft DCO (C1/F04). The protective provisions ensure ongoing consultation with the Environment Agency through the detailed design stage as it notes where the Environment Agency must be consulted on plans and details of works carried out by the Applicants. As set out in Part 2 of the Land Rights Tracker (REP1-065), the Applicants are awaiting further comments from the Environment Agency. The Applicants are confident the protective provisions for the Environment Agency will be agreed before the end of Examination.
	2.6.10.11 Page 77: We await the technical note at D1 to clarify that there will be no flood risk effects from temporary construction works in the maximum design scenario.	2.6.10.11 Page 77: The Applicants await the Environment Agency's review of Section 1.3 of the Clarification Note: Construction Scenarios (REP1-060) submitted at Deadline 1.

Reference	Written Representation Comment	Applicants' response
	Page 89. <u>This Ref can be closed.</u> We are satisfied that flood warning procedures will be prepared as part of the detailed CoCP(s) in consultation with the Environment Agency.	Page 89: The Applicants note that this reference is now closed.
REP1-076 076.23	0677.20 Flood risk assessment – Part 1 of 2 <u>This Ref can be closed.</u> We are satisfied with the response.	The Applicants note that this reference is now closed.
REP1-076 076.24	0677.21 Flood risk assessment – part 2 of 2 <u>This Ref can be closed.</u> Matter is covered under Ref.0677.3 above.	The Applicants note that this reference is now closed.
REP1-076 076.25	0677.22 Soil Management Plan Further discussion required. The EA's concern is specifically regarding the potential for temporary soil storage to divert or obstruct the movement of flood waters. This concern does not appear to be addressed in the Outline Soil Management Plan [APP-200] and associated best practice guidance.	The Applicants note that the Outline Soil Management Plan (APP-200) refers to recognised best practice guidance including the DEFRA Construction Code of Practice for the Sustainable Use of Soils on Construction Sites (Defra, 2009). Section 5.4 of this DEFRA guidance stipulates that temporary soil storage should not be located close to drains and watercourses such that they cause any increase flooding risk to the surrounding area. The Applicants consider that adherence to the DEFRA guidance will address the EA's concern.
REP1-076 076.26	0677.23 Geology, hydrogeology and ground conditions Table 1.14 Row 2 and Table 1.17 Row 2: <u>This Ref. can be closed.</u> We are satisfied with the response. Table 1.14 and Table 1.17 Row 2: <u>This Ref. can be closed.</u> We are satisfied with the response. Commitments:	The Applicants note that this reference is now closed.

Reference	Written Representation Comment	Applicants' response
	<u>This Ref. can be closed.</u> We are satisfied with the response.	
REP1-076 076.27	0677.24 Schedule 10 Protective Provisions Part 9 2. (4) Typographical error <u>This Ref can be closed.</u> This error will be corrected through the revised protective provisions.	The Applicants note that this reference is now closed.
REP1-076 076.28	0677.25 Additional Requirement: Hydrogeological Risk Assessment (HyRA) <u>This Ref can be closed.</u> Covered in Ref.0677.4 above.	The Applicants note that this reference is now closed.
REP1-076 076.29	0677.26 Additional Requirement: Foundation Works Risk Assessment <u>This Ref can be closed.</u> Covered in Ref.0677.4 above.	The Applicants note that this reference is now closed.
REP1-076 076.30	0677.27 Additional Requirement: Consultation with the Environment Agency on detail design <u>This Ref. can be closed.</u> Matter covered under Ref.0677.3 above.	The Applicants note that this reference is now closed.
REP1-076 076.31	0677.28 Flood Risk Activity Permits (FRAPs) <u>This Ref. can be closed.</u>	The Applicants note that this reference is now closed.

Reference	Written Representation Comment	Applicants' response
	Matter covered under Ref.0677.3 above.	

2.5 Fylde Council

Table 2.5: REP1-079 –Fylde Council

Reference	Written Representation Comment	Applicants' response
REP1-079 079.1	<p>1. Approach</p> <p>1.1 Fylde Council [FBC] is a statutory consultee and Interested Party with reference to the proposed Morgan and Morecambe Offshore Wind Farms Transmission Assets development.</p> <p>1.2 This Written Statement [WS] is submitted at Deadline 1, alongside a Local Impact Report [LIR]. Whilst FBC acknowledges that the purpose of the LIR is typically to set out an evidence-based assessment of the likely impacts of the proposals, as set out in the LIR and expanded upon in this WS, FBC considers that the submitted Environmental Statement [ES] does not enable such a primarily objective assessment.</p> <p>1.3 This means that there is overlap between the LIR and WS in terms of the issues covered. However, FBC considers that both the LIR and WS are relevant and not duplicative – the WS provides a clear explanation of the authority's view on the application and comments on the planning balance, whereas the LIR focuses on interpreting and appraising the evidence.</p>	The Applicants note the response from Fylde Borough Council, and the approach taken between their Local Impact Report and their Written Representation.
REP1-079 079.2	<p>2. Policy Context</p> <p><u>National Policy and Guidance</u></p> <p>2.1 The National Planning Policy Framework [NPPF] is a material consideration for the assessment of NSIPs and as such has been referred to as appropriate within this LIR.</p> <p>2.2 There are a number of National Policy Statements which are relevant to the assessment of NSIPs, the most pertinent being EN-1, EN-3 and EN-5.</p>	The Applicants note Fylde Borough Council's response.

Reference	Written Representation Comment	Applicants' response
	<p>2.3 These proposals are subject to the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 [the EIA Regulations].</p> <p><u>The Development Plan</u></p> <p>2.4 The Fylde Local Plan to 2032 (incorporating Partial Review) [FLP] is the extant plan for Fylde. The relevant policies are referenced throughout the LIR as appropriate. Links to the Local Plan are provided in appendix 2 to this report.</p> <p>2.5 FBC has published its Local Development Scheme 2025 which sets out the programme for the production of the next Local Plan. The existing Local Plan will be five years old from adoption in December 2026. Initial stages of preparation of the new plan have commenced, including the issue of a call for sites. It is intended to undertake a Regulation 18 consultation in August-September 2025. Consideration of sites through the Strategic Housing and Economic Land Availability Assessment process will run from May to October 2025. Publication for consultation under Regulation 19 stage is scheduled for May-June 2026, with submission proposed for August 2026.</p> <p>2.6 The new plan will run to 2042, ten years on from the existing Local Plan. Initial intentions are that the new plan will incorporate existing policies where possible, although that is subject to the outcomes of the Regulation 18 stage.</p>	
REP1-079 079.3	<p>3. The Authority's View</p> <p><u>Structure</u></p> <p>3.1 In order to appropriately set out the Authority's views and comments on planning balance, FBC has structured this WR with reference key topics as set out below. FBC has been mindful of the list of matters covered in Issue Specific Hearing 1 and refers to these where appropriate.</p> <p>- Draft Development Consent Order</p>	The Applicants note Fylde Borough Council's response and have responded to each point raised below.

Reference	Written Representation Comment	Applicants' response
	<ul style="list-style-type: none"> - Environmental Statement - Economy - Environment - Human Health 	
REP1-079 079.4	<p>4. Draft Development Consent Order</p> <p>4.1 FBC notes that the DCO is the most significant output of the Nationally Significant Infrastructure Process [NSIP] because, alongside other matters, it should define the works which have been approved and should set out the requirements which will control the construction, commissioning, operations and decommissioning of the approved works.</p> <p>4.2 The applicant confirmed at Specific Issue Hearing 1 that the Rochdale Envelope approach was being used, seeking to set out the worst-case scenario of development. However, the guidance (Paragraph 008 Reference ID 04-008-20240430) requires that the parameters used must be no more than necessary to accurately contain the proposed development. This goes on to explain that where the final positioning of works is to be secured by detailed design, these must be accompanied by the precise location of works, subject to limits of deviation.</p> <p>4.3 The dDCO does not include such locations and limits, for example with regards to dams in the dune areas and junction boxes along the route.</p> <p>4.4 As set out in more detail in its LIR, FBC expects an updated dDCO to be provided which addresses two main issues. First, the ES is deficient and therefore the dDCO cannot be accurate and effective. Second, the dDCO does not provide appropriately specific controls to ensure that the works are carried out in a way which appropriately reflects the assessment in the ES and also which enables appropriate</p>	<p>4.1 The proposed works are set out in Schedule 1 (Authorised Project) of the draft DCO (C1/F04) and shown on the Works Plans - Onshore and Intertidal Part 1 of 2 (AS-016) and Works Plans - Onshore and Intertidal Part 2 of 2 (AS-017). In addition, further detail regarding the proposed works can be found in Volume 1, Chapter 3: Project Description (F1.3/F03).</p> <p>4.2 The Applicants therefore maintain that the works falling within 'associated development' do not go beyond what has been assessed in the Environmental Statement (ES). The Applicants refer Fylde Borough Council to their response to Hearing Action Point ISH1_22 (see REP1-037), which explains the Applicants' use of the Rochdale Envelope, i.e. that the ES is based on a maximum design scenario. The Council is therefore in a position to both understand and assess the impacts of the Transmission Assets from the application documentation.</p> <p>The Applicants also refer Fylde Borough Council to point 4.1.4 in the Applicants' response to Fylde Council Local Impact Report (S_D2_5) in regard to the use of the Rochdale Envelope.</p> <p>4.3 As noted above, the proposed works, and the proposed locations for each set of proposed works, are set out in Schedule 1 (Authorised Project) of the draft DCO (C1/F04) and shown in the Works Plans - Onshore and Intertidal Part 1 of 2 (AS-016) and Works Plans - Onshore and Intertidal Part 2 of 2 (AS-017). Works No. 6A6B, covers Lytham St Annes SSSI, the description of works states "Morgan/Morecambe onshore cable works under Lytham St. Annes Dunes SSSI including up to four/two cable circuits and associated cable ducts between Work No. 5A and Work No. 8A laid underground by trenchless installation technique works or direct pipe works" Therefore this does not allow for there to be cofferdams and/or pits associated with the trenchless technique in this specific area. The Applicants confirm that the use of temporary cofferdams is limited to Works Nos. 5A, 5B, 4A, and 4B, where such measures may be necessary to facilitate</p>

Reference	Written Representation Comment	Applicants' response
	<p>control with reference to requirements to be discharged by FBC.</p> <p>4.5 FBC also considers that similar issues exist with regards to protected provision but at this stage defers these matters to Lancashire County Council [LCC] and other statutory undertakers as appropriate.</p> <p>4.6 For development which will have such significant, long-term impacts over a large part of Fylde, FBC is of the opinion that it is unacceptable that the dDCO does not properly define the works or control the construction, commissioning, operations and decommissioning.</p>	<p>construction activities. The location of the cable link boxes and joint bays will be determined post-consent through detailed design and further survey work.</p> <p>4.4 The Applicants refer Fylde Borough Council to points 18.1.3 and 4.2.1 in the Applicants' response to Fylde Council Local Impact Report (S_D2_5) in regards to the robustness of the ES and controls within the dDCO.</p> <p>In addition, Requirement 3 of Schedules 2A and 2B of the draft Development Consent Order (C1/F04) states that works may not be commenced until notification has been submitted to the relevant planning authority detailing whether the Project onshore works and intertidal works will be constructed in a single stage or in two or more stages. This ensures that the Council as local planning authority will have full visibility of the stages of the construction of the Transmission Assets.</p> <p>4.5 The Applicants note Fylde Borough Councils comment.</p> <p>4.6 The Applicants refer Fylde Borough Council to point 4.2.1 in the Applicants' response to Fylde Council Local Impact Report (S_D2_5) in regards to the controls within the dDCO.</p>
REP1-079 079.5	<p>5. Environmental Statement</p> <p>5.1 The EIA Regulations set out a requirement for the Environmental Statement [ES] to describe the aspects of the environment likely to be significantly impacted by the proposals, with specific reference to a range of topics. FBC notes the range of topics identified in the submitted ES and also summarised by the topics specified by the ExA to guide the examination.</p> <p>5.2 At a high level, FBC is of the opinion that parts of the ES are inappropriate, incomplete or inconsistent. Details were notably provided through Relevant Representations [RR-0705] with further explanation provided in the LIR submitted alongside this WR. This has two main implications. Firstly, it inhibits proper assessment of the potential impacts and all work following on from this, including but not limited to design of mitigation, monitoring and management. Secondly, it makes the process more difficult for interested parties to engage with</p>	<p>The Applicants note the comments raised by Fylde Borough Council and have provided comments to their Relevant Representation in Applicants' Response to Written Representations from Statutory Consultees (S_D2_3) and local impact report in the Applicants' response to Fylde Council Local Impact Report (S_D2_5).</p> <p>In the development of the Application the Applicants' have used the Rochdale Envelope approach, i.e that the Environmental Statement is based on a maximum design scenario (MDS). The assessment of effects in each ES topics are undertaken based on the MDS (worst case) described in the Volume 1, Chapter 5: Environmental assessment methodology (APP-034). The Applicants also highlight that each topic chapter of the ES sets out the assumptions made regarding the project design envelope, relevant to that chapter, and the MDS for each impact, along with a justification for the use of the MDS as the basis of each respective assessment.</p> <p>The Applicants maintain that the Application provides a detailed and complete suite of documents which includes a robust Environmental Statement and associated outline management plans.</p>

Reference	Written Representation Comment	Applicants' response
	and reduces the confidence of members of the public that matters are being appropriately addressed. 5.3 Furthermore, FBC is of the opinion that topics relating to: Human Health and Recreation; and, Risk Management and Resilience, should also be identified and used for the purposes of structuring the examination.	An assessment on the potential impacts on human health as a result of the Project can be found in Volume 1, Annex 5.1 : Human Health (APP-035). Similarly, the topic of Recreation is covered in Volume 3, Chapter 6: Land Use and Recreation (APP-104). Lastly, Risk Management is a multi-disciplinary topic however is covered within the following documentation: <ul style="list-style-type: none"> • Volume 3, Chapter 2: Hydrology and Flood Risk (APP-070); • Outline Spillage and Emergency Response Plan (AS-046) • Code of Construction Practice (APP-193).
REP1-076 076.6	5.4 In terms of Human Health, FBC considers that this position is supported by Paragraph 4.3.2 of EN-1 as well as the requirements of the EIA Regulations, which include specific reference to consideration of the effects on human health. This is explained further under the 'Human Health' heading later in this WR.	In addition, the Applicants highlights that Schedules 2A & 2B of the draft DCO (C1/F04) requires the Applicants to submit a range of management plans for approval to the relevant planning authority before commencement of such works.
REP1-076 076.7	5.5 In terms of Risk Management and Resilience, Paragraph 4.3.3 of EN-1 and the EIA Regulations set out a requirement assess "the likely significant effects of the proposed project on the environment, covering the direct effects and any indirect, secondary, cumulative, transboundary, short, medium, and long-term, permanent and temporary, positive and negative effects at all stages of the project, and also of the measures envisaged for avoiding or mitigating significant adverse effects." 5.6 The LIR submitted by FBC sets out in detail matters relating to risk and resilience, summarising that large infrastructure projects of this scale inevitably introduce a range of risks to the local environment, businesses, community and service resilience, particularly during the construction and decommissioning phases. The current proposals lack sufficient detail, assessment and control, and the impacts are potentially so significant that such matters must be considered as a discrete topic.	The Applicants have also provided a response to further comments in regards to Human Health in REP1-07 079.11below and within Section 14 and 15 within the Applicants' response to Fylde Council Local Impact Report (S_D2_5).
REP1-076	6. Economy	6.1: Potential effects on socio-economics and tourism have been assessed within ES Volume 4, Chapter 2: Socio-economics (APP-141) and clarified within

Reference	Written Representation Comment	Applicants' response
076.8	<p>6.1 Paragraph 4.2.12 of EN-1 clearly requires applicants to set out how residual impacts of the development will be compensated for as far as possible and should also set out how any mitigations or compensation measures will be monitored, and reporting agreed to ensure that action is taken. This recognises that not only is there a need for the proposals to identify the potential impacts but also to set out a detailed strategy for managing those impacts.</p> <p>6.2 Chapter 8 of the FLP sets out that the preservation and development of a strong, vibrant and sustainable economy is a high priority. The LIR submitted by FBC alongside this WR provide more detailed assessment of the likely economic impacts. This includes impacts on specific, significant economic infrastructure such as Warton Aerodrome, tourism and agricultural land. These impacts are exacerbated by the high degree of flexibility sought and lack of detail provided by the applicant, for example in terms of build-out scenarios.</p> <p>6.3 FBC considers that the proposals are not supported by sufficient information to meet the requirements of EN-1. For example, a key reference in terms of managing economic impacts is the Outline Employment and Skills Plan [APP-239]. The commitments in this plan are often vague typically setting out “encouragement” or “support” (for example within Table 1.4), with no specific actions or control mechanisms presented.</p>	<p>S_D1_5.10 Annex 5.10 to the Applicants response to Hearing Action Points: ISH1 52 - Rev F01 (REP1-046).</p> <p>6.2: No representations have been made suggesting there would be potential socio-economic impacts on Warton Aerodrome, which was scoped out of ES Volume 3, Chapter 11: Aviation and radar (APP-130).</p> <p>The impact of the Transmission Assets on agricultural land holdings are considered in Volume 3, Chapter 6: Land use and recreation (APP-104)</p> <p>6.3: The Outline Employment & Skills Plan (OESP) (APP-239) has been prepared in line with NPS EN-1 [Paragraph 5.13.4]. The OESP establishes the high level approach to support positive local employment, training and employment impacts included in the DCO application. The language used within the OESP is therefore appropriate for this purpose.</p> <p>The OESP will form the basis of detailed Employment and Skills Plans (ESPs) which will be prepared in consultation with local stakeholders to ensure actions respond to local needs. The preparation of these detailed plans in accordance with the OESP is set out within Requirement 19 (Employment and Skills Plan) in Schedules 2A and 2B of the draft DCO (C1/F04). This is cited within the ES Volume 4, Chapter 2: Socio-economics (APP-141) at Table 2.29.</p>
REP1-079 079.9	6.4 FBC notes that the applicant is of the opinion that a s106 or other legal agreement will only be required for a narrow range of specific impacts, such as at Blackpool Airport or Blackpool Road South playing fields. FBC is of the opinion that a broader s106 will be required to adequately secure compensation for the residual impacts and that this should sit within the DCO along with details of the monitoring and reporting procedures.	The Applicants refer Fylde Borough Council to points 17.1.1 and 17.1.2 in the Applicants' response to Fylde Council Local Impact Report (S_D2_5) where details are provided on the S106 and information on the Applicants' commitments to delivering wider community benefits.
REP1-079	7. Environment	The Applicants highlight that they have committed to providing biodiversity benefit although this is not a mandatory requirement of any Nationally Significant

Reference	Written Representation Comment	Applicants' response
079.10	<p>7.1 Section 5.4 of EN-1 sets out requirements relating to biodiversity and geological conservation.</p> <p>7.2 Section 5.4.21 goes on to explain that energy infrastructure projects have the potential to deliver significant benefits and enhancements, beyond Biodiversity Net Gain, which would result in wider environmental gains.</p> <p>7.3 The Coastal Change Management areas in Fylde are particularly sensitive to change and include the Ribble Estuary SSSI and adjoining Lytham St. Anne's Dunes SSSI which in turn support Sand Lizards which are a priority species, protected under the Wildlife and Countryside Act, 1981. The proposed development will impact upon these areas and it is very concerning to see a lack of detail about what is proposed. For example, the timing, duration and frequency of works, the access management, the size, number and location of build infrastructure, all within these sensitive areas are not specified.</p> <p>7.4 The Relevant Representations and LIR submitted by FBC, as well as submission by other interested parties, provide extensive detail of where the applicant's submission is incomplete and inaccurate with regards to ecological assessment.</p> <p>7.5 Section 5.4.22 of EN-1 goes on to specifically require that NSIP proposals consider the move of mobile and migratory species. FBC notes that a significant unresolved matter relates to the fact that the applicant has not provided proper information relating to impacts on birds and proposed mitigation.</p> <p>7.6 As a result of these issues, FBC is of the opinion that the ES and proposals which flow from it do not meet the requirements of EN-1.</p>	<p>Infrastructure Project. The Applicants are proposing to make a voluntary commitment to achieve an overall biodiversity benefit for areas of permanent habitat loss associated with the permanent above-ground infrastructure of the Transmission Assets.</p> <p>The Applicants reiterate that there would be no direct impacts to the sand dune habitats or sand lizard population at Lytham St Anne's SSSI, LNR, BHS and GHS as a result of the construction of the project, because the dunes will be crossed using trenchless technology. Further information regarding the trenchless technique installation can be found in Volume 1: Chapter 3: Project Description (F1.3/F03).</p> <p>Section 3.11.4 of Volume 3, Chapter 3: Onshore Ecology and Nature Conservation (APP-075) assesses the potential impacts to Lytham St Annes Dunes SSSI which concludes that all potential impacts would result in either a minor adverse residual effect or no effect which are not considered significant in EIA terms.</p> <p>In addition, Section 3.11.13 of Volume 3, Chapter 3: Onshore Ecology and Nature Conservation (APP-075) provides an assessment of the potential impact on sand lizards as a result of the Transmission Assets. The assessment concludes that all potential impacts would result in either a minor adverse residual effect or no effect which are not considered significant in EIA terms.</p> <p>An assessment of the potential impact on the Ribble Estuary SSSI are presented in Section 3.11.3 of Volume 3, Chapter 3: Onshore Ecology and Nature Conservation (APP_075). The assessment concludes that all potential impacts would result in either a minor adverse residual effect or no effect which are not considered significant in EIA terms.</p> <p>The Applicants would also refer Fylde Council to the Applicants' Response to Fylde Council Local Impact Report (REP1-078 – paragraphs 4.1.1, 4.1.2, 4.1.3, 4.1.4 and 4.2.1) (S_D2_5).</p> <p>The Applicants note this comment 7.4 and refer Fylde Council to The Applicants' response to FBC's Relevant Representation (PDA-030) and to the Applicants' Response to Fylde Council Local Impact Report (REP1-078, S_D2_5).</p>

Reference	Written Representation Comment	Applicants' response
		The Applicants stand by the Environmental Statement (ES) and maintain that it, and the Transmission Assets proposal, meet the requirements set out in National Policy Statement EN-1.
REP1-079 079.11	<p>8. Human Health</p> <p>8.1 Chapter 4.4 of EN-1 relates to health and sets out that whilst access to energy is clearly beneficial to society and health as a whole, the construction and operation of energy infrastructure may have negative impacts on health. FLP echoes this at page 179, noting that renewable energy has a link to health and wellbeing.</p> <p>8.2 EN-1 goes on to give examples of the types of impacts on health, which notably includes: increased traffic; dust; and noise. Whilst FBC is concerned about these impacts across the lifetime of the development, they are likely to be particularly pronounced during the build-out and decommissioning phases. This means that details of the nature, timing, duration and frequency of any works are required to be able to assess the impacts of the development.</p> <p>8.3 The Relevant Representations and LIR submitted by FBC set out the opinion that there is a lack of specific detail, or any evidence of meaningful engagement by the applicant with contractors and suppliers. This in turn means that the potential adverse health impacts and measures to avoid, reduce or compensate for these impacts cannot be achieved, in accordance with Section 4.4.4. of EN-1.</p>	<p>The Applicants refer Fylde Borough Council to Section 14 within the Applicants' response to Fylde Council Local Impact Report (S_D2_5).</p> <p>The Applicants highlight that the UK Health Security Agency and the Department of Health's Office for Health Improvement and Disparities have reviewed the assessment and state that they agree with the methods and that they are satisfied that the proposed development should not result in any significant adverse impact on public health (AS-061).</p> <p>In addition, Schedules 2A & 2B of the draft DCO (C1/F04) contain specific controls with regard to timing, frequency, construction and decommissioning:</p> <ul style="list-style-type: none"> - Requirement 3 (Stages of authorised project) requires the Applicants to confirm to the relevant planning authority whether construction of the authorised project will be in one or more stages and submission of the details of these stages for approval before the onshore and intertidal works may start. It also prevents the construction from being carried out in more than one overall phase. - Requirement 8 (Code of Construction Practice) provides that no stage of the onshore works or intertidal works may commence until detailed CoCP(s) for the relevant stage of works have been submitted to and approved by the relevant planning authority (following consultation with Lancashire County Council, Natural England, the EA and the Marine Management Organisation (MMO) as appropriate). The detailed CoCP(s) must cover all the matters in the Outline Code of Construction Practice (APP-193) and its annexed outline management plans for the matters listed within the requirement. The detailed plans must be implemented as approved. - Requirement 14 (Construction hours) sets out standard construction hours for the onshore construction works and construction-related traffic movements except where otherwise specified in the Requirement. Sub-paragraph (2) specifies the type of work that can be carried out outside of the standard

Reference	Written Representation Comment	Applicants' response
		<p>construction hours. Sub-paragraphs (3) to (5) deal with the specific notification requirements in relation to works.</p> <ul style="list-style-type: none"> - Requirement 16 (Restoration of land used temporarily for construction) requires land used for temporary construction of the Project A or Project B onshore works and Project A or Project B intertidal works to be reinstated within 12 months following completion of the relevant stage of works in accordance with the details approved by the relevant planning authority. - Requirement 22 (Onshore decommissioning) requires the submission for approval to the relevant planning authority an onshore decommissioning plan for the Project A or Project B onshore works within six months of permanent cessation of commercial operation or Project A onshore works or Project B onshore works prior to any decommissioning works taking place. The onshore decommissioning plan must be implemented as approved. <p>This ensures that the Council as local planning authority will have full visibility of the all-project documents and management plans.</p> <p>The Applicants would also refer Fylde Council to the Applicants' Response to Fylde Council Local Impact Report detailing the specific controls with regard to timing, frequency, construction and decommissioning (REP1-078 – paragraphs 4.2.1, 8.1.20, 12.1.12 and 12.2.2) (S_D2_5)..</p> <p>In relation to point 8.3, the Applicants also confirm that the details presented in the application have been informed by extensive experience gained through the development of offshore wind and cable infrastructure projects across the UK. As such, the proposals reflect established good practice within the industry. These standards and approaches will be maintained and further developed through the work of the appointed contractors, who will be required to adhere to the commitments and methodologies set out within the application. This therefore, also means that the potential adverse health impacts and measures to avoid, reduce or compensate for these impacts will be achieved, in accordance with Section 4.4.4. of EN-1.</p>
REP1-079	9. Summary	The Applicants note the comments raised by Fylde Borough Council which have been responded to above.

Reference	Written Representation Comment	Applicants' response
079.12	<p>9.1 FBC has sought to set out the likely impacts of the proposed development within the Fylde local authority area in its LIR submitted alongside this WR. The purpose of this WR is to set out the view of FBC on the application and to comment on the planning balance.</p> <p>9.2 In terms of being able to form a view on planning balance, FBC and its consultees have encountered a consistent problem with the ES and dDCO, this being that they are at times inadequate, incomplete and inconsistent. Any attempt to balance the adverse impacts against the benefits of the scheme must be supported by the required information.</p> <p>9.3 Indeed, National Policy Statements EN-1, EN-3 and EN5 are predicated on balance and provisions for appropriate mitigation. This is true in the broadest sense and Section 2.6.2 of EN-1 explains that sustainable development is relevant not just in terms of addressing climate change but also because the way energy infrastructure is deployed affects the wellbeing of the environment, society and the economy. Notably here, the way in which energy infrastructure is deployed is also of central importance.</p> <p>9.4 FBC is concerned that the applicant is not able to explain how the infrastructure will be deployed and considers that this uncertainty may be at the heart of deficiencies in the ES and dDCO. This may be why much of the information presented lacks specific or appropriate detail.</p>	

2.6 Historic England

Table.6: REP1-082 –Historic England

Reference	Written Representation Comment	Applicants' response
REP1-082 082.1	<p>Morgan and Morecambe Offshore Wind Farms: Transmission Assets</p> <p>PINs Ref: EN020032</p> <p>Historic England Registration ID: 20053940</p> <p>Marine/Offshore comments for inclusion within Historic England's Written Representation</p> <p>1) Environmental Statement (ES), Volume 1, Chapter 3 Project description (Document Ref: F1.3; PINs Examination Ref: APP-024) – The proposed project will comprise construction, operation and maintenance and decommissioning of the offshore export cables (as described in Table 3.1), Sub-section 3.11 (Pre-construction and/or site preparation activities) describes preparatory works inclusive of Unexploded Ordnance (UXO) clearance and sand wave clearance and removal. We therefore take this opportunity to stress the importance of ensuring all planning for pre-construction geophysical and geotechnical surveys includes advice from a professional, accredited and experienced archaeological consultancy service. The importance of this approach is to ensure adequate attention is given to risk assessment that presently unknown elements of the historic environment might be encountered. We therefore appreciate the attention given in paragraph 3.12.3.9 regarding a consent obligation that any UXO identified for clearance does not coincide with archaeology/sensitive seabed features. Furthermore, we note the estimation "...that up to 9% of the cable route may require sandwave clearance..." and that these sand waves could be 5m in height, particularly adjacent to the proposed Morgan Offshore Wind Farm. Paragraph 3.12.3.16 also highlights that</p>	<p>The Applicants welcome this response. The Outline Offshore Written Scheme of Investigation (WSI) and Protocol for Archaeological Discoveries (PAD) (APP-222) sets out the requirement for a retained archaeologist to provide input into the planning of geophysical and geotechnical surveys (Section 1.7.3).</p>

Reference	Written Representation Comment	Applicants' response
	"...Pre-Lay Grapple Run activities will take account of and adhere to any archaeological mitigation as detailed in the Outline Offshore Written Scheme of Investigation for archaeology."	
REP1-082 082.2	2) In reference to potential impact, each offshore export cable (to a maximum of 6 cables) could be installed within separate trenches spaced 200m apart. However, closer to the Lancashire coast, in the approach to at Lytham St Annes, the separation distance will be reduced to 20m. Although the Applicants wish to maintain design flexibility, a possible cable burial depth (paragraph 3.4.12.8) of 3m is set out in Table 3.6. It is therefore apparent that to effectively plan any campaign of cable installation using trenching, plough, jetting or mechanical cutting, it will be essential to subject all pre-construction geophysical survey data to archaeological analysis and interpretation Regarding the detail within sub-section 3.14.5 (Works between the direct pipe exits pits to MLWS), we defer to the relevant local authority archaeological advice service for any further comment regarding the historic environment as might be encountered within the intertidal area.	The Applicants welcome this response. The Outline Offshore WSI and PAD (APP-222) sets out the requirement for any new geophysical and / or geotechnical survey data, together with factual reports, to be made available to the Applicants' retained archaeologist, or a suitably qualified Archaeological Contractor, for archaeological analysis and interpretation (Section 1.7.4).
REP1-082 082.3	3) ES Volume 1, Chapter 8 (Marine Archaeology and Cultural Heritage (Document Ref: F2.8; PINs Examination Ref: APP-059) utilises desk-based sources of information held by the UK Hydrographic Office (UKHO), Historic England's National Record for the Historic Environment (NRHE) and the Shipwreck Inventory held by Manx National Heritage. These archival sources indicate the presence of 15 "live" wreck records within the transmission assets cable corridor, with 6 records corroborated with geophysical data (acquired in 2022, as described in Section 8.6.4). We note that one (military) aircraft loss record is attributed to the proposed development corridor, as described in paragraph 8.6.3.25). If this record is	The Applicants welcome this response. As detailed in Section 1.8.3 of the Outline Offshore WSI and PAD (APP-222), the Applicants consider that the majority of aircraft wrecks are military and so fall under the legal protection of the Protection of Military Remains Act 1986.

Reference	Written Representation Comment	Applicants' response
	confirmed it is important to be aware that it could be subject to the Protection of Military Remains Act 1986.	
REP1-082 082.4	4) We are aware that the Applicants commissioned geophysical survey data which was acquired between April and September 2022 and comprised Multibeam Echo Sounder (MBES), Side Scan Sonar (SSS), Magnetometer, parametric Sub-bottom Profiler (SBP) and Pinger SBP. We also acknowledge that geotechnical survey was conducted in 2022 to acquire vibro-cores and how the analysis contributed to our understanding of Quaternary period climatic conditions within the Eastern Irish Sea region.	The Applicants note this response.
REP1-082 082.5	5) Paragraph 8.6.4.3 details 147 anomalies of potential archaeological interest were identified within the proposed Order limits for Morgan Generation, Morecambe Generation and Morgan and Morecambe Transmission projects with 8 anomalies through to be of "high" potential, 14 "medium" potential and 125 "low" potential anomalies. Also identified is one magnetic-only anomaly (paragraph 8.6.4.4) and given that it is not identified within other geophysical survey data it is thought that it could represent a buried feature. It is important that the Applicants have acknowledged in Section 8.6.6 (Data limitations) that there is the risk that this project could subsequently discover presently unknown elements of the historic environment, such as to buried archaeological features, as described within Table 8.11 (High and Medium Potential Anomalies within the Offshore Order Limits).	The Applicants note this response. The potential for activities to expose previously unrecorded marine archaeology receptors is acknowledged with mitigation provided in the Outline Offshore WSI and PAD (APP-222).
REP1-082 082.6	6) Section 8.7 (Scope of the assessment) is focused on assessment of the impacts potentially arising from the construction, operation and maintenance, and decommissioning phases of the proposed Transmission Assets. We concur with the summaries provided in Tables 8.13 and 8.14 regarding impacts either scoped in or out of the assessment. Section 8.8 (Measures adopted as part of the	The Applicants welcome this response.

Reference	Written Representation Comment	Applicants' response
	Transmission Assets (Commitments) relies on embedded mitigation to avoid significant impact and that Table 8.15 includes "commitment CoT63" for Outline Offshore Written Scheme of Investigations (WSI) for Archaeology which includes the use of Archaeological Exclusion Zones (AEZs) and a Protocol for Archaeological Discoveries (PAD). We concur with approach to using AEZs (as described in Section 8.8.2 and Table 8.16).	
REP1-082 082.7	7) Section 8.9 (Key parameters for assessment) considers the "maximum design scenario" whether concurrent or sequential (vis. spatial scale and extent of impacts). We are therefore prepared to accept the descriptions provided in Table 8.17 (Maximum design scenario considered). Sub-section 8.10.5 Approach to Historic Seascape Characterisation (HSC) attempts to consider HSC as a factor in the ES assessment exercise. However, it does not adequately or sufficiently explain how HSC provides context within which change can be considered and evaluated. We do not agree with the conclusions offered, such as set out in paragraph 8.10.5.9. In our response to the Preliminary Environmental Information Report (PEIR) consultation exercise (November 2023) we also explained our disagreement. However, we do not consider it necessary to offer further comment on this topic.	The Applicants welcome Historic England's agreement with the Maximum Design Scenario (MDS) as presented in AS-032. The Applicants note Historic England's position on Historic Seascape Characterisation (HSC) and welcome the closure of this topic.
REP1-082 082.8	8) Section 8.11 (Assessment of effects) the determination of residual effects for construction, operation and maintenance and decommissioning phases, and the reliance on embedded mitigation measures, such as recording archaeology before any loss, does not reduce harm or magnitude of impact. We appreciate that the investigation of archaeology at risk of loss or disturbance is essential and will reduce the loss of knowledge and understanding, but it cannot reduce the actual harm. We therefore do not agree with the downgrading of	As stated in RR-0839 839.4 (PDA-007), this is noted by the Applicants. It is acknowledged that action to record sites cannot remove the magnitude of the impact on marine archaeology receptors and therefore the significance of effect. However, the primary project mitigation will be avoidance, which would be achieved for known receptors through the implementation of AEZs and for unknown receptors and low potential anomalies through pre-construction site investigation surveys, micro-siting, and other mitigation such as the Protocol for Archaeological Discoveries and Temporary AEZs. These are set out and are secured within the Outline Offshore WSI and PAD (APP-222) and will be implemented through the detailed Offshore WSI and PAD for archaeology, as

Reference	Written Representation Comment	Applicants' response
	residual impact and concluding residual effects as “not significant” in EIA terms used in this section.	secured within Conditions 18(1)(g) and (2) within the deemed marine licences in the draft DCO (C1/F04, Schedules 14 and 15). Crucially, in the case of a discovery of high potential receptor, a Temporary AEZ can be assigned if appropriate. Where a Temporary AEZ is assigned mid-construction, such construction would be paused and would not recommence in the Temporary AEZ without the approval of Historic England as the Archaeological Curator (APP-222, Section B.5.7). Investigation of archaeology at risk of loss or disturbance will be only used as a final resort, after consultation with Historic England, and will be in line with relevant guidance (e.g. Archaeological Written Schemes of Investigation for Offshore Wind Farm Projects (The Crown Estate, 2021)).
REP1-082 082.9	9) Table 8.21 (Monitoring commitments) describes the application of outline offshore WSI, however, a WSI is not “monitoring” per se, but a framework for investigation methodologies to be implemented e.g. ahead of construction to inform final design planning to adequately take account of the historic environment that is either known to exist within the development area or that might be encountered (i.e. the presently unknown).	This is noted by the Applicants. In line with Condition 18(1)(g)(v) within the deemed marine licences in the draft DCO (C1/F04, Schedules 14 and 15), the Outline Offshore WSI and PAD (APP-222) contains the commitment to monitor the appropriateness and effectiveness of the AEZs within the Transmission Asset Order Limits and the condition of the archaeological assets within the Offshore Order Limits, where required.
REP1-082 082.10	10) Section 8.12 (Cumulative effect assessment methodology) and 8.13 (Cumulate effects assessment), we appreciate the detail provided regarding the assessment methodology and the consideration of four scenarios plus the use of tiered approach alongside other identified project and plans. We are therefore prepared to accept the conclusions presented in Tables 8.24 to 8.29.	The Applicants welcome this response.
REP1-082 082.11	11) ES Volume 2, Annex 8.1 Marine Archaeological Technical Report (Document Ref: F2.8.1; PINs Examination Ref: APP-060) – Section 1.3.4 provides a review of data acquired from geophysical surveys conducted between April and September 2022 and concluded that these data were “...of an appropriate	As stated in RR-0839 839.2 (PDA-007), in response to section 51 (s51) advice (of the Planning Act 2008), updated versions of the marine archaeology ES chapter and technical report were submitted into examination (Response to s51 advice - 2.8 ES Volume 2, Chapter 8: Marine archaeology (AS-032); Response to s51 advice - F2.8.1 ES Volume 2, Annex 8.1: Marine archaeology technical report (AS-

Reference	Written Representation Comment	Applicants' response
	<p>specification, coverage and quality to undertake a robust marine archaeological assessment to inform the EIA process" (paragraph 1.3.4.6). We also note that subsequent analysis and interpretation of these data and of geotechnical vibro-cores obtained was conducted by an appropriately experienced and accredited consultancy. Regarding the presentation of information, it is apparent that archaeological interpretation of data (desk-based as well as geophysical data) is for the order limits for Morgan Generation Assets (PINs Project Ref: EN010136), Morecambe Generation Assets (PINS Project Ref: EN010121) and Morgan and Morecambe Offshore Wind Farms Transmission Assets (PINs Project Ref: EN020032). However, it is noticeable that Morgan and Morecambe Transmission ES Chapter 8 states there are 14 "medium" anomalies within the Offshore Order Limits (paragraph 8.6.4.3), as does the Annex 8.1 Technical Report (in paragraph 1.5.6.3), but paragraph 1.5.6.5 states there are 13 "medium" potential. This is a minor matter, but clarity on the actual number of anomalies afforded "medium" status will be appreciated. For example, Annex 8.1, Figure 1.7 shows 14 "medium" potential anomalies. The number of "low" potential anomalies should also be checked as the Technical Report states 122 and ES Chapter 8 states 125. Annex 8.1, Table 1.9 identifies "medium" potential anomalies and Table 1.10 "high" potential anomalies within the Transmission Assets order limits; with two "high" potential anomalies within the proposed export cables corridor e.g. MG23_0014 and MG23_0059 (see also Figures 1.11 and 1.12). It is apparent that the most appropriate strategy for these anomalies should be avoidance. However, sufficient attention is necessary within the accompanying Outline WSI to support all subsequent investigation necessary to inform project planning, should consent be obtained.</p>	<p>034)). These updated documents clarified the numbers of anomalies within the marine archaeology study area (which encompasses the Offshore Order Limits). There were 147 anomalies within the marine archaeology study area. Of these, 128 anomalies of potential archaeological interest were identified within the Offshore Order Limits. Of these, eight were classified as high potential anomalies, 12 as medium potential and 108 as low potential anomalies (see Response to s51 advice - 2.8 ES Volume 2, Chapter 8: Marine archaeology (AS-032), paragraph 8.6.4.3; and Response to s51 advice - F2.8.1 ES Volume 2, Annex 8.1: Marine archaeology technical report (AS-034), paragraph 1.5.6.4).</p>
REP1-082	12) Outline Offshore Written Scheme of Investigation and Protocol for Archaeological Discoveries (Document Ref: J17;	The Applicants note this comment.

Reference	Written Representation Comment	Applicants' response
082.12	PINs Examination Ref: APP-222). It is important that acknowledgement is provided that the Outline Offshore WSI and Protocol for Archaeological Discoveries (PAD) details the principles to be implemented to ensure the protection of marine archaeological receptors through all phases of the Transmission Assets project (construction, operation and maintenance and decommissioning) as relevant to the known historic environment and the risk of encountering presently unknown sites of potential archaeological interest.	
REP1-082 082.13	13) We agree with the approach that the WSI to guide delivery of this proposed project (should consent be obtained) is set out within the Transmission Assets Order Limits for the area seaward of Mean High Water Springs (MHWS). We hereby support the requirement for "...a written scheme detailing the stages of construction for Project A or Project B to be submitted for approval by the MMO prior to the commencement of the licensed activities." (paragraph 1.2.1.4). Importantly, we appreciate the attention given to pre-construction and/or site preparation activities and the definition of "works".	The Applicants welcome this response.
REP1-082 082.14	14) Outline Offshore WSI, Section 1.4.5 (Archaeological Curator) – the text of this section requires amendment given that it is the relevant Local Authority historic environment advice service that is primarily body responsible for advice within any intertidal area and therefore up to MHWS and should be included accordingly in Table 1.2. For clarity, Historic England is the only independent (national) curatorial body that can provide advice for any area seaward of Mean Low Water and outwith of any terrestrial local planning authority jurisdiction. Outline Offshore WSI Paragraph 1.4.8.2, requires clarifying – "approval", as a consent requirement, is only possible from the MMO (as the competent authority). In order to reach a decision to approve any Final Offshore WSIs for	<p>The Applicants welcome Historic England's suggestions. The Outline Offshore WSI and PAD (APP-222) will be updated in the suggested manner in Sections 1.4.5 and 1.4.8.2 and submitted at Deadline 3.</p> <p>It is noted that the Outline Offshore WSI and PAD (APP-222) is only applicable to activities seawards of Mean Low Water Springs (MLWS). The activities in the area between Mean High-Water Springs and MLWS are covered by the Outline Onshore and Intertidal WSI (APP-214).</p>

Reference	Written Representation Comment	Applicants' response
	Archaeology, it is likely that the MMO will seek the advice of the statutory historic advisory body (Historic England). It is therefore relevant to differentiate between formal approval, as can only be given by the MMO, and consultation with Historic England in the production of any final Offshore WSIs for Archaeology, prior to submission to the MMO.	
REP1-082 082.15	15) Outline Offshore WSI Section 1.6 (mitigation) – we accept the measures set out in this section, as summarised as “secured commitment” CoT63 e.g. Archaeological Exclusion Zones (AEZs), monitoring and watching briefs and the use of a protocol system for reporting finds of possible archaeological interest. Furthermore, we accept the process of producing method statements in consultation with Historic England to guide further archaeological work (i.e. specialist analysis of further survey data acquired by the project), prior to any formal approval by the relevant competent authority (the MMO) in accordance with their decision-making timeframes. Section 1.9 (Reporting and archiving) correctly identifies key matters of relevance to the proposed development, which are appropriately included within the draft Deemed Marine Licences, as stated in paragraph 1.9.2.3.	The Applicants welcome this comment.
REP1-082 082.16	16) Draft Development Consent Order (Document Ref: C1; PINs Examination Ref: Ref: APP-005) – we recommend that attention is given to Schedules 14, condition 18(1)(g) and Schedule 15, condition 18(1)(g) regarding the production of a scheme specific Offshore Written Scheme of Investigation (WSI). In order to ensure how these projects are delivered in a consistent way nationally, we request that conditions 11(2) and 11(3) in deemed Marine Licence Schedule 12 (Transmission Assets) in the Rampion 2 Offshore Wind Farm Order 2025 (made 4th April 2025) are used as a template for this draft DCO. For example, to include the relevant local curatorial body in relation to those part of the offshore Order limits landwards	<p>The Applicants have compared the drafting of Conditions 18(1)(g), 18(2) and 19 of Schedules 14 and 15 of the draft DCO (C1/F04) with conditions 11(2) and 11(3) of the Rampion 2 Offshore Wind Farm Order 2025. The Applicants note that this drafting does not include a reference to a ‘relevant local curatorial body’ nor does it use the wording noted by Historic England. It is therefore not clear what changes Historic England require, and the Applicants will engage with Historic England directly on this point.</p> <p>The Applicants would highlight that there is a separate Outline Onshore and Intertidal Written Scheme of Investigation (landwards of MLWS) (APP-214).</p>

Reference	Written Representation Comment	Applicants' response
	of Mean Low Water Springs as well as consultation with the statutory historic body (Historic England).	

2.7 Lancashire Association of Local Councils Fylde Area Committee Energy Working Group

The Applicants' response to the WR of the Lancashire Association of Local Councils Fylde Area Committee Energy Working Group (REP1-083) is provided in Annex 3.1 to Applicants' Response to WRs from Statutory Consultees: Lancashire Association of Local Councils Fylde Area Committee Energy Working Group (Document Reference: S_D2_3.1)

2.8 Marine Management Organisation

The Applicants' response to the WR of the Marine Management Organisation (REP1-086) is provided in Annex 3.2 to Applicants' Response to WRs from Statutory Consultees Marine Management Organisation (Document Reference: S_D2_3.2).

2.9 Maritime and Coastguard Agency

Table 2.7: REP1-088 –Maritime and Coastguard Agency

Reference	Written Representation Comment	Applicants' response
REP1-088 088.1	<p>Dear Sir/Madam</p> <p>Morecambe and Morgan Offshore Wind Farms: Transmission Assets</p> <p>Deadline 1 – Written Representation</p> <p>The Maritime and Coastguard Agency (MCA) is an Executive Agency of the Department for Transport and is responsible throughout the UK for implementing and developing the UK Government's maritime safety and environmental protection policy. This includes co-ordinating maritime Search and Rescue (SAR) through His Majesty's Coastguard 24 hours a day, and checking that ships meet UK and international safety rules. The MCA works to prevent the loss of lives at the coast and at sea, to ensure that vessels are safe, and to prevent coastal pollution. The UK Technical Services Navigation Branch is responsible for UK radiocommunication and navigation policy. This primarily covers SOLAS Convention (Safety of Life at Sea Convention 1974, as amended) Chapters IV and V; the COLREG Convention (International Regulations for Preventing Collisions at Sea 1972, as amended); and the ITU Convention (International Telecommunications Convention 1932, as amended). The Navigation Risk Assessment (NRA), the Shipping and Navigation chapter of the Environmental Impact Report and the draft DCO have been reviewed and we would like to comment as follows:</p> <p>F2.7 Volume 2, Chapter 7: Shipping and Navigation (APP-056),</p> <p>F2.7.1 Volume 2, Annex 7.1: Navigation risk assessment – Part 1 of 2 (APP-057) and,</p>	<p>This is noted by the Applicants.</p>

Reference	Written Representation Comment	Applicants' response
	F2.7.1 Volume 2, Annex 7.1: Navigation risk assessment – Part 2 of 2 (APP-058).	
REP1-088 088.2	<p>The Applicant has undertaken a detailed Navigation Risk Assessment (NRA) in accordance with MCA guidance MGN (Marine Guidance Note) 654 and NRA risk assessment methodology. We are satisfied that appropriate traffic data has been collected in accordance with MGN654. This includes various sources of data including Automatic Identification System (AIS) data from 2019 and 2022. This has been supplemented by vessel traffic surveys for the generation assets assessment from 2021 to 2023. MCA is content that the traffic data collection is suitable for the assessment.</p> <p>Key and appropriate stakeholders were identified, and the MCA is content that suitable consultation took place via a hazard identification workshop and dedicated meetings. A completed MGN 654 Checklist has been provided as part of the NRA, and we are content the recommended NRA methodology process has been followed.</p> <p>We are content with the applied mitigations listed in Tables 1.10 and 1.37 which are reflected in the draft Development Consent Order, subject to some amendments (see below). We are content that the Hazard Log in Appendix A provides a reasonable assessment of the hazards and we note there are no unacceptable risks identified.</p> <p>We are content with regards to the process undertaken for complying with the guidance in MGN 654 and its annexes, and we welcome the work to be undertaken for addressing the guidance and recommendations in the future.</p>	The Applicants welcome this response.
REP1088 088.3	<p>Cable Routes and Cable Protection</p> <p>It is noted in the Project Description (APP-024) that High Voltage Alternate Current (HVAC) equipment will be used and there will not be an offshore substation. HVDC cables are not</p>	This is noted by the Applicants. Condition 18(1)(e)(iii) of Schedule 14 and Schedule 15 (deemed marine licences) limits any cable protection exceeding five percent navigable depth referenced to Chart Datum without approval from the licencing authority in consultation with the MCA and Trinity House.

Reference	Written Representation Comment	Applicants' response
	<p>expected to have an impact on electro-magnetic fields and ships' magnetic compasses.</p> <p>We note that the cables are expected to be buried and any consented cable protection works must ensure existing and future safe navigation is not compromised. If cable protection measures are required e.g., rock bags or concrete mattresses, the MCA would accept a maximum of 5% reduction in surrounding depth referenced to Chart Datum. This will be particularly relevant where depths are decreasing towards shore and potential impacts on navigable water increase.</p>	
REP1088 088.4	<p>Safety Zones</p> <p>There is no mechanism for applying for safety zones around cables or cable laying vessels in the UK. The applicant has suggested they will develop a process for managing and communicating the use of 'advisory exclusion zones' in the post-consent stage (APP-240 J33 Safety Zone Statement). MCA would like to clarify that the International Regulations for Preventing Collisions at Sea (IRPCS or Collision Regulations) apply to all vessels at sea and accordingly, vessels must remain a safe distance from the cable laying vessel. The applicant may request third party vessels remain a specified distance from the cable laying vessel, which can be promulgated via their local notifications to mariners, however there is no legal basis for enforcement unless there is an infringement of the Collision Regulations.</p>	This is noted by the Applicants.
REP1-088 088.5	<p>Unexploded Ordnance (UXO)</p> <p>Clearance HM Coastguard (HMCG) must be notified at least seven days in advance of any proposed UXO clearance works, in this case to zone32@hmcg.gov.uk and zone33@hmcg.gov.uk and to include emergency contact information for the vessel and the expected timescale of operation. Verbal communication should be made directly with</p>	The Applicants have updated the draft DCO (REP1-008) at Deadline 1 to remove high-order UXO clearance and restrict clearance to low-order techniques (see Condition 20 in Schedule 14 and 15). Condition 14(8) in Schedule 14 and Schedule 15 secures the issuance of local notice to mariners (which would include HMCG) at least 14 days prior to the commencement of the authorised scheme or any part thereof. Condition 14(9) in Schedule 14 and Schedule 15 secures that local notice to mariners are updated and reissued at regular intervals and supplemented with VHF radio broadcasts agreed with the MCA. Condition 20(1) in

Reference	Written Representation Comment	Applicants' response
	HMCG at the start of the UXO works, and again to notify the end of the clearance. This can be established either using the appropriate radio channels/frequencies or via telephone in this case to Holyhead MRCC on 01407 762051.	Schedule 14 and Schedule 15 prohibits commencement of UXO clearance until a method statement has been approved by the licencing authority in consultation with the MCA. Therefore, the Applicants will incorporate the specific notification requirements to HMCG in the method statement for low order unexploded ordnance clearance.
REP1-088 088.6	Wreck Material (advisory note) The applicant is reminded of their legal obligation, under part 9 of the Merchant Shipping Act 1995, to report all recoveries of wreck material to the Receiver of Wreck. This must be done within 28 days of recovery. Failure to report the recovery of wreck material to the Receiver is a criminal offence. Additional information and a report of wreck and salvage form can be found at www.gov.uk/guidance/wreck-and-salvage-law .	The Applicants welcome this response. As detailed in section B.6.1 of the Outline Offshore Written Scheme of Investigation (WSI) and Protocol for Archaeological Discoveries (PAD) (APP-222), appropriate finds will be reported to the Receiver of Wreck within the required timescales (28 days) by the Applicants. Additionally, Condition 18(1)(g)(vii) in Schedule 14 and Schedule 15 secures the requirement to report any wreck or wreck material found during construction, operation, and decommissioning of the Transmission Assets.
REP1-088 088.7	Emergency Response and Search and Rescue As there will be no permanent surface piercing structures as part of the transmission assets a completed SAR Checklist and a full Emergency Response Co-operation Plan (ERCoP) are not required. A Marine Emergency Action Card (MEAC) is considered appropriate for this project.	This is noted by the Applicants.
REP1-088 088.8	Post Construction Surveys We will expect a post lay cable burial survey to be carried out to confirm where the target depths have or have not been met. Any locations where the cable remains as either surface laid or shallow buried should be reassessed, considering the traffic levels and types of vessel activity in that area as further risk mitigation may be required, such as an anchor penetration study. This should be discussed further once the final installation techniques have been identified, with relevant navigation stakeholders. We will expect a hydrographic survey of the export cable route in accordance with MGN 654 Annex 4 supporting document	The Applicants confirm that post-construction monitoring is secured under Condition 26 (3)(a) of Schedules 14 and 15 of the draft DCO (C1/F04) which includes a requirement to undertake a full sea floor coverage swath-bathymetry survey that meets the requirements of MGN 654 and its supporting Hydrographic Guidelines for Offshore Renewable Energy Developers. Additionally, Condition 18(1)(e)(iv) requires the Applicants to submit proposals for monitoring offshore cables including details of cable protection until the authorised scheme is decommissioned which includes a risk based approach to the management of unburied or shallow buried cables, and Condition 26(5) in Schedule 14 and Schedule 15 secures that following the installation of cables, details of cable monitoring required under 18(1)(d) must be updated with the results of the post installation surveys.

Reference	Written Representation Comment	Applicants' response
	<p>titled 'Hydrographic Guidelines for Offshore Developers', available on our website: https://www.gov.uk/guidance/offshore-renewable-energy-installations-impact-on-shipping. We would like to highlight the need to provide the data in either GSF or CARIS format and that Total Vertical and Horizontal Uncertainty (TVU & THU) calculations are provided.</p>	
REP1-088 088.9	<p>C1 Draft Development Consent Order including Deemed Marine Licences (APP-005)</p> <p>We would like to request the following amendments in the Deemed Marine Licences as follows:</p> <p><u>Schedule 14 Part 1</u></p> <p>1(4)(f) – MCA contact details in should be amended to:</p> <p><i>Maritime and Coastguard Agency</i> <i>UK Technical Services Navigation</i> <i>Spring Place</i> <i>105 Commercial Road</i> <i>Southampton</i> <i>SO15 1EG</i> <i>Email: navigationsafety@mcga.gov.uk</i></p>	<p>The Applicants have amended the MCA's contact details in Schedules 14, 15, 16 and 17 of the draft DCO (C1/F04) submitted at Deadline 2.</p>
REP1-088 088.10	<p><u>Schedule 14 Part 2</u></p> <ul style="list-style-type: none"> 14(9) – replace “regular intervals” with “weekly intervals”. This was requested at the PEIR stage. 24(4)(a) – side scan sonar data is not necessary for the bathymetry survey, therefore suggest removing “and side scan sonar, of the area(s)”. 	<ul style="list-style-type: none"> 14(9) has been amended as requested in Schedules 14 and 15 of the draft DCO (C1/F04). 24(4)(a) has been amended as requested in Schedules 14 and 15 of the draft DCO (C1/F04). 26(3)(a) has been amended as requested in Schedules 14 and 15 of the draft DCO (C1/F04). 28(1) has been amended as requested in Schedules 14 and 15 of the draft DCO (C1/F04).

Reference	Written Representation Comment	Applicants' response
	<ul style="list-style-type: none"> 26(3)(a) – side scan sonar data is not necessary for the bathymetry survey, therefore suggest removing “and side scan sonar, of the area(s)”. 28(1) – the close out report must be submitted within three months of the date of completion. This was requested at the PEIR stage. 	
REP1-088 088.11	<p><u>Schedule 15 Part 1</u></p> <p>1(4)(f) – MCA contact details in should be amended to:</p> <p><i>Maritime and Coastguard Agency</i> <i>UK Technical Services Navigation</i> <i>Spring Place</i> <i>105 Commercial Road</i> <i>Southampton</i> <i>SO15 1EG</i> <i>Email: navigationsafety@mcga.gov.uk</i></p>	Please see response to REP1-088 088.9 above.
REP1-088 088.12	<p><u>Schedule 15 Part 2</u></p> <ul style="list-style-type: none"> 14(9) – replace “regular intervals” with “weekly intervals”. 24(4)(a) – side scan sonar data is not necessary for the bathymetry survey, therefore suggest removing “and side scan sonar, of the area(s)”. 26(3)(a) – side scan sonar data is not necessary for the bathymetry survey, therefore suggest removing “and side scan sonar, of the area(s)” 28(1) – the close out report must be submitted within three months of the date of completion. 	Please see response to REP1-088 088.10 above.
REP1-088	<u>Schedule 16 Part 1</u>	Please see response to REP1-088 088.9 above.

Reference	Written Representation Comment	Applicants' response
088.13	1(4)(e) – MCA contact details in should be amended to: <i>Maritime and Coastguard Agency</i> <i>UK Technical Services Navigation</i> <i>Spring Place</i> <i>105 Commercial Road</i> <i>Southampton</i> <i>SO15 1EG</i> <i>Email: navigationsafety@mcga.gov.uk</i>	
REP1-088 088.14	<u>Schedule 16 Part 2</u> <ul style="list-style-type: none"> 14(8) – replace “regular intervals” with “weekly intervals”. 18(1) – the close out report must be submitted within three months of the date of completion. 	<ul style="list-style-type: none"> 12(8) has been amended as requested in Schedules 16 and 17 of the draft DCO (C1/F04). 18(1) has been amended as requested in Schedules 16 and 17 of the draft DCO (C1/F04).
REP1-088 088.15	<u>Schedule 17 Part 1</u> 1(4)(e) – MCA contact details in should be amended to: <i>Maritime and Coastguard Agency</i> <i>UK Technical Services Navigation</i> <i>Spring Place</i> <i>105 Commercial Road</i> <i>Southampton</i> <i>SO15 1EG</i> <i>Email: navigationsafety@mcga.gov.uk</i>	Please see response to REP1-088 088.9 above.
REP1-088 088.16	<u>Schedule 17 Part 2</u> <ul style="list-style-type: none"> 14(8) – replace “regular intervals” with “weekly intervals”. 	Please see response to REP1-088 088.14 above.

Reference	Written Representation Comment	Applicants' response
	<ul style="list-style-type: none"> 18(1) – the close out report must be submitted within three months of the date of completion. 	
REP1-088 088.17	<p>Conclusion</p> <p>The comments detailed above are considered appropriate and necessary for the safety of navigation and Search and Rescue purposes. We hope you find them useful at this stage and MCA is happy to discuss further as the project progresses.</p>	This is noted by the Applicants.

2.10 National Grid Electricity Transmission plc

Table 2.8: REP1-089 –National Grid Electricity Transmission plc

Reference	Written Representation Comment	Applicants' response
REP1-089 089.1	<p>1 Introduction</p> <p>This written representation is submitted on behalf of National Grid Electricity Transmission plc (NGET) in response to the application by Morgan Offshore Wind Limited and Morecambe Offshore Windfarm Limited (together the Promoter) for a development consent order (DCO) for the Morgan Offshore Wind Farm and the Morecambe Offshore Wind Farm (Proposed Development).</p>	<p>This is noted by the Applicants.</p>
REP1-089 089.2	<p>2 NGET infrastructure</p> <p>2.1 As set out in NGET's relevant representation dated 27 January 2025, NGET has a number of assets that form an essential part of the electricity transmission network in England and Wales either within, or in close proximity to, the Proposed Development, being:</p> <p><u>Substation</u></p> <p>(a) Penwortham 275kV substation;</p> <p>(b) Penwortham 400kV substation;</p> <p>(c) Associated overhead and underground apparatus including cables;</p> <p><u>Overhead Lines</u></p> <p>(d) ZQ 400kV OHL Padiham – Penwortham Carrington – Daines – Penwortham;</p> <p>(e) ZQ 275kV OHL Kirkby – Penwortham = Washway Farm 1 Kirkby – Penwortham – Washway Farm 2;</p> <p>(f) ZQ 400kV OHL Heysham – Hutton = Penwortham 1 Heysham – Hutton – Penwortham 2; and</p> <p>(g) VF 400kV OHL Heysham – Penwortham – Stanah 1 Heysham – Penwortham – Stanah 2,</p>	<p>The Applicants acknowledge and thank National Grid Electricity Transmission (NGET) for the information provided in relation to its infrastructure and its plans in relation to the Eastern Extension and the Upgraded Infrastructure. The Applicants note NGET's description that the NGET Penwortham substation upgrade is "<i>critical infrastructure to enable the connection of multiple projects at this location</i>". This is consistent with the position in NGET's relevant representation that its proposals are "<i>part of NGET's Great Grid Upgrade – the largest overhaul of the grid in generations. NGET infrastructure projects across England and Wales are connecting additional renewable energy to homes and businesses [...]</i>".</p> <p>Although focussed on the protection of its assets, NGET's representation aligns with the Applicants' explanation in response to ISH1_HAP6 (REP1-039) of the process by which a Point of Interconnection is identified (for the projects the PoI is the NGET Penwortham substation). It also reinforces the Applicants' position, supported by NPS policy, that it is not necessary nor appropriate to consider or assess during this Examination different projects with alternative Pols (or "terminating point[s]" in terms of paragraph 2.2.1 of NPS EN-5).</p> <p>This explanation of NGET's broader plan for the assets in this area also reinforces the complexity and strategic nature of providing a transmission network as an electricity transmission licensee, and highlights again (see Section 3.5 of REP1-039) the practical challenge of participants in the Examination unilaterally proposing technical upgrades and changes to NGET's network.</p>

Reference	Written Representation Comment	Applicants' response
	<p>(together, Existing Infrastructure).</p> <p>2.2 Additionally, NGET is bringing forward a project to upgrade the existing Penwortham substation in the near future (the Penwortham Upgrade). These upgrade works comprise the physical extension of the Penwortham substation to the east of the existing substation (Eastern Extension), a substation extension in north (Upgraded Infrastructure), and associated works and infrastructure.</p> <p>2.3 The Eastern Extension and the Upgraded Infrastructure are located within NGET non-operational land and therefore additional land is not required to facilitate construction but planning applications will need to be submitted and approved.</p> <p>2.4 NGET will also be constructing a cable route into the Eastern Extension to facilitate a connection to the network for Network Rail Infrastructure Limited (Network Rail Connection).</p> <p>2.5 The Penwortham Upgrade is critical infrastructure to enable the connection of multiple projects at this location, with the Proposed Development being only one of a number of projects requiring a future connection to the Penwortham substation. NGET has entered into connection agreements with each of the relevant customers obligating NGET to provide a connection for their individual projects.</p> <p>2.6 In addition, the Upgraded Infrastructure (being part of the Penwortham Upgrade), is also required to replace existing infrastructure at the Penwortham substation. An extension is required in the north to fulfil NGET's legal obligation to facilitate new connections and upgrade infrastructure, so it is efficient and economic. NGET proposes to construct the Upgraded Infrastructure to transition away from the current infrastructure in place at the substation so that existing connections are provided via the Upgrade Infrastructure as well as to facilitate a number of new connections at the Penwortham substation.</p>	

Reference	Written Representation Comment	Applicants' response
	2.7 The Penwortham substation will also be impacted by a programme of works taking place in the North-West region to reinforce the network for the more efficient transport of electricity across the country. In particular, the Mersey Ring Project will upgrade the lower voltage, lower capacity elements of the network to increase the amount of electricity able to flow through the existing network. This will make the network more efficient and lower the impact on the environment and communities. Penwortham substation will be subject to upgrades to existing overhead lines as a result of the Mersey Ring Project and these are vital for ensuring the longevity of the network.	
REP1-089 089.3	<p>3 Summary of NGET's concerns</p> <p>3.1 The Proposed Development provides for the connection of the Morgan Offshore Wind Farm and the Morecambe Offshore Wind Farm at Penwortham substation. The draft Order and associated works plans currently anticipate that the cables for each wind farm can be connected at either the western or the eastern side of the substation.</p> <p>3.2 It is currently anticipated that the Morgan Offshore Wind Farm connection (Morgan Connection) (will be via the new the Eastern Extension (located to the east of the existing substation) and the Morecambe Offshore Wind Farm connection (Morecambe Connection) will be via a new bay to be constructed on the western side of the existing substation (within the substation's operational boundaries).</p> <p>3.3 There are therefore a number of interfaces between the Proposed Development, NGET's existing apparatus and the Penwortham Project which raise concerns for NGET.</p>	The Applicants note that paragraph 3.2 of NGET's written representation states that it is 'currently anticipated' that Morgan will connect to the east and Morecambe to the west. Given the significant works identified for the Penwortham substation it is notable that NGET are not definitive on this. As NGET's own plans for Penwortham are not currently in the public domain and may be subject to change, the Applicants remain of the view that it is entirely reasonable for Morgan and Morecambe to retain the flexibility to connect to either side of the existing Penwortham substation, dependent on NGET's final decisions and programme for its own works.
REP1-089 089.4	<p><u>Morgan Connection interface with Eastern Extension</u></p> <p>3.4 The draft Order provides powers to undertake electrical works for Morgan to connect into the existing Penwortham National Grid substation (Work No. 32A and 33A). It has been established that Morgan will not be connecting into</p>	The Applicants note that NGET states at paragraph 3.4 that Morgan OWL will connect into the Eastern Extension. However, as per REP1-089 089.3 above, the Applicants note that NGET's plans for Penwortham are not currently in the public domain and may be subject to change.

Reference	Written Representation Comment	Applicants' response
	<p>the existing Penwortham substation but instead will be connecting into the Eastern Extension.</p> <p>3.5 To undertake the Eastern Extension works to facilitate both the Proposed Development and the Network Rail Connection, it is necessary for NGET to have control over this Work Area. NGET cannot be put in a position where the Eastern Extension works could be compromised or prejudiced by an individual connectee project, such as the Proposed Development. Without the Eastern Extension, the Proposed Development cannot connect and therefore NGET any works proposed to be undertaken in this area by the Promoter should be approved by NGET.</p>	<p>The information provided by NGET in relation to other connectee projects and their own works (i.e. both the proposed Eastern Extension works and the upgraded infrastructure works) is noted; however, it is also notable that NGET's written representation does not include firm proposals or indicative timings for any of the NGET works or proposed connections. Once that information is in the public domain, the Applicants will consider it further with NGET, including any potential interactions with the Transmission Assets and how these can best be managed. The Applicants will continue their ongoing engagement with NGET with particular focus on the protective provisions and associated side agreements as this is the appropriate mechanism via which to manage any interaction and overlap between NGET's works and other connectee projects.</p>
REP1-089 089.5	<p><u>Network Rail Connection</u></p> <p>3.6 The Eastern Extension will facilitate both the Morgan Connection and the Network Rail Connection. The Network Rail Connection is necessary to increase capacity. This will allow for the increased utilisation of the electrified railway line, required due to upgrading the fleet from diesel to electric.</p> <p>3.7 Due to the limited space available within this area, it is currently anticipated that the Network Rail Connection will be routed into the Eastern Extension from the south, through Plot 18-054 within which construction compounds are proposed to be located as part of Works No. 18A/B under the draft Order.</p> <p>3.8 Given that powers have been sought under the draft Order in relation to Plot 18-054, NGET needs to ensure that this area is not sterilised by construction compounds to facilitate either the Morgan Connection or Morecambe Connection preventing construction of the Network Rail Connection.</p>	
REP1-089 089.6	<p><u>Preservation of permanent access to Penwortham substation</u></p>	

Reference	Written Representation Comment	Applicants' response
	<p>3.9 The Order provides powers for the creation and improvement of access to highway and works to visibility splays (Works No. 34) and creation of temporary accesses and visibility splays for construction (Works No. 19A) at the bellmouth of the access road. This is NGET's primary access to the Penwortham substation and will be required for the Eastern Extension. NGET needs to retain access at all times to the Penwortham substation and during the Eastern Extension works.</p> <p>3.10 The Order also proposes to route the Morgan Connection cable under the access road and NGET needs to ensure that its access to the substation and the Eastern Extension is not adversely affected as a result of these works.</p>	
REP1-089 089.7	<p><u>Reinstatement of screening mound</u></p> <p>3.11 There is currently a screening mound located to the east of the Penwortham substation (shown as Plot 18-048 in the Order Land Plan) which was required under a planning condition to the authorising permission when the substation was built to ensure adequate screening. The mound will need to be reprofiled to accommodate the Eastern Extension and ensure there is a safe distance between the mound and the new Eastern Extension equipment. This will be achieved by cutting into the side of the mound facing the existing substation to make it narrower. The mound will require an element of reinstatement following completion of the Eastern Extension works due to screening requirements of the local planning authority. The local planning authority may also require conditions providing that the mound be physically altered from its existing state to make the application for the Eastern Extension works acceptable.</p> <p>It is understood that the Morgan Connection works will include alterations of the mound. Depending on the timing</p>	

Reference	Written Representation Comment	Applicants' response
	<p>of the Morgan Connection works, it may be the case that NGET have undertaken works to alter the mound in accordance with conditions of the local planning authority and therefore NGET would want to ensure that the mound was returned to this condition following completion of the Morgan Connection works.</p>	
<p>REP1-089</p> <p>089.8</p>	<p><u>Upgraded Infrastructure</u></p> <p>3.12 NGET intends to expand the existing substation to the north (within operational boundaries) to fulfil it's legal obligation to facilitate new connections and upgrade infrastructure, so it is efficient and economic. The expansion would require OFGEM approval.</p> <p>3.13 Although the Upgraded Infrastructure is currently anticipated to fall within the operational boundaries of the existing Penwortham substation, in the event that OFGEM does not approve the Upgraded Infrastructure, NGET will need to redesign to provide an alternative solution which would need to be located outside of the operational boundaries. The area that would be appropriate for this would be the area to the south-west of the existing Penwortham substation. The extent of the area available to NGET in order to undertake these works is limited by the presence of a gas pipeline which would need to be accommodated into any design.</p> <p>3.14 This is land that is not owned by NGET and therefore compulsory acquisition would need to be sought. NGET is not clear at this stage of the exact proposed route for the Morecambe Connection but needs to ensure that the route is sympathetic to the proposed future infrastructure that may need to be undertaken here and NGET should have approval of the route.</p>	

Reference	Written Representation Comment	Applicants' response
REP1-089 089.9	<p>4 Protective provisions</p> <p>4.1 There is significant infrastructure being delivered within the same area and potentially within similar timescales. As such, there needs to be careful co-ordination and consultation undertaken between NGET and the Promoter to ensure that each project can be delivered without unduly interfering with the each other and other connectee projects. This is provided for in the form of protective provisions that NGET is seeking to include in the Order (NGET Protective Provisions). These also provide for the protection of NGET's Existing Infrastructure as well as compliance with relevant safety standards.</p> <p>4.2 NGET seeks to secure protective provisions broadly in line with those that were included in the recently granted Awel y Môr Offshore Wind Farm Development Consent Order (the AYM DCO). For background, the development proposed under the AYM DCO proposed similar interactions with NGET apparatus as are present here in that NGET is constructing an extension to the existing Bodelwyddan substation to facilitate connections with third-party connectees, including the project which was the subject of the AYM DCO.</p> <p>4.3 The protective provisions secured under the AYM DCO included safeguarding provisions as per paragraphs 3 to 7 of NGET's Protective Provisions, along with associated amendments to other standard protective provisions to ensure that they apply to the future NGET works/apparatus/land, e.g. the protective provisions concerning the acquisition of NGET's land by the Promoter in paragraph 11 of NGET's Protective Provisions – without appropriate amendments, these protective provisions would not apply to third party land required for the NGET Upgrade Projects and the NHM Project.</p> <p>4.4 The interactions between NGET's existing and future apparatus and the Proposed Development are more extensive and complex at this location as compared to Awel</p>	<p>The Applicants note that NGET has provided its preferred form of protective provisions. As set out in the Land Rights Tracker (REP1-065), the Applicants are continuing to engage with NGET in respect of their required form of protective provisions and the necessary commercial agreements required to secure the appropriate protections for NGET. The Applicants continue to consider that the relevant documentation can be agreed before the end of examination.</p>

Reference	Written Representation Comment	Applicants' response
	<p>y Môr Offshore Wind Farm and Bodelwyddan Substation as there is more future NGET apparatus to be constructed and a greater physical overlap of the Proposed Development with NGET's proposed schemes. There is thus even greater scope for the Proposed Development to compromise or prejudice the construction and operation of one or more of the future NGET projects. In other words, there is an even greater necessity for the inclusion of safeguarding provisions of this nature in the DCO than there was even for the AYM DCO.</p> <p>4.5 The draft DCO submitted to the Examination does not include paragraphs 3 to 7 of NGET's Protective Provisions. Without specific safeguarding provisions for NGET's future upgrade projects, the protective provisions currently included in the draft Order only relate to existing NGET apparatus and land and so there is nothing to prevent the Proposed Development from adversely affecting the Penwortham Project as set out above to the serious detriment of NGET's undertaking and other connectees at this site.</p> <p>4.6 As such, NGET considers that it is reasonable and appropriate for the safeguards and protections secured for NGET's benefit in the AYM DCO to be included in the DCO here.</p> <p>4.7 For completeness, we include a copy of the AYM DCO at Appendix 1. The protective provisions for NGET's benefit from Part 3 of Schedule 9 of the AYM DCO. A copy of the NGET Protective Provisions are included at Appendix 2.</p>	
REP1-089 089.10	<p>5 Status of negotiations</p> <p>5.1 NGET's solicitors have been engaging with the Promoter's solicitors in relation to the protective provisions. Negotiations are significantly more advanced with Morgan Offshore Wind Limited than Morecambe Offshore Windfarm Limited however a meeting was held between NGET and Morecambe on 19 May 2025 and negotiations are now</p>	Please see response to REP1-089 089.9 above.

Reference	Written Representation Comment	Applicants' response
	<p>progressing. For the reasons set out above, NGET considers that it is absolutely necessary for the NGET Protective Provisions to be included in the Order and will continue to make robust submissions throughout the Examination until this principle is agreed and the wording is included within the Order.</p> <p>5.2 Until satisfactory agreement has been reached with the Promoter, NGET must continue to reserve the right to make further submissions to the examination and attend hearings at a later date.</p>	

2.11 Natural England

The Applicants' response to the Risk and Issue Log of Natural England (REP1-093) is provided in Annex 3.3 to Applicants' Response to WRs from Statutory Consultees: Natural England's Risk and Issues Log (Document Reference: S_D2_3.3).

2.12 Network Rail

Table 2.9: REP1-094 –Network Rail

Reference	Written Representation Comment	Applicants' response
REP1-094 094.1	<p>Introduction</p> <p>We are instructed by Network Rail Infrastructure Limited ("Network Rail") in relation to the Development Consent Order ("DCO") application made by Morgan Offshore Wind Project Limited and Morecambe Offshore Windfarm Ltd ("the Promoter") to construct, operate and maintain, and decommission two electrically separate transmission systems connecting two nationally significant infrastructure projects -the Morgan Offshore Wind Project: Generation Assets and the Morecambe Offshore Windfarm: Generation Assets - in the east Irish Sea approximately 30 kilometres from the northwest coast of England to the National Grid, at Penwortham, Lancashire ("the Project").</p> <p>Network Rail is a statutory undertaker responsible for maintaining and operating the country's railway infrastructure and associated estate. Network Rail owns and operates Great Britain's railway network and has statutory and regulatory obligations in respect of it. Network Rail aims to protect and enhance the railway infrastructure and therefore any proposed development on, over or under the railway network or which is adjacent to and interfaces with the railway network or potentially affects Network Rail's land interest will be carefully considered. It was confirmed on 31 March that the Examining Authority accepted that as a statutory party Network Rail would be granted interested party status.</p>	<p>The Applicants thank Network Rail Infrastructure Limited (Network Rail) for its written representation (REP1-094). The Applicants note and acknowledge Network Rail's role as a statutory undertaker, its statutory and regulatory obligations, the nature of its operational railway infrastructure and its land interest. The Applicants thank Network Rail for their continued engagement.</p>
REP1-094	Powers sought in the DCO	<p>The Applicants note Network Rail's position and concerns in relation to the powers sought under the draft Development Consent Order (DCO) (C1/F04). As confirmed</p>

Reference	Written Representation Comment	Applicants' response
094.2	<p>Network Rail is an affected landowner. There are references in the DCO Book of Reference to land for which Network Rail is the owner and occupier. The draft Order for the Project ("the draft Order") includes powers for the Promoter to permanently acquire rights as well as the extinguishment, suspension or interference with easements or other rights over land where Network Rail has an interest. Whilst Network Rail does not object in principle to the DCO, Network Rail does object to the powers contained in article 22 (compulsory acquisition of rights) and article 24 (private rights) of the draft Order authorising the Promoter to compulsorily acquire rights in or over land which forms part of Network Rail's operational railway land and which Network Rail relies upon for the carrying out of its statutory undertaking.</p> <p>Any acquisition of permanent rights should only be granted with Network Rail's consent and would require an easement agreed with Network Rail. It would also need to go through Network Rail's land clearance process as required by Network Rail's Network Licence. Any existing rights which Network Rail have over the land would need to be retained and cannot be subject to extinguishment under the Order.</p> <p>Due to the draft Order seeking to authorise work either above or adjacent to Network Rail's operational railway and works which may impede Network Rail's ability to ensure the safe, efficient and economical operation of the railway network, Network Rail requires certain standard protections for the benefit of the operational railway and to manage this interface. Network Rail's requirements for the protection of its operational railway and associated railway infrastructure are set out in further detail in this representation.</p>	<p>in the Applicant's response to Network Rail's Relevant Representation (PDA-007, Applicants' response to AS-065.3), there are protective provisions for the benefit of Network Rail at Part 8 of Schedule 10 to the DCO (REP1-008). These provisions restrict the Applicants from exercising its powers under articles 22 (compulsory acquisition of rights), 24 (private rights) and article 31 (statutory undertakers) in respect of railway property without Network Rail's consent.</p>
REP1-094 094.3	<p>Protective Provisions and associated agreements</p> <p>Network Rail welcomes the form of protective provisions for the protection of Network Rail's operations which are included on</p>	<p>The Applicants note Network Rail's request for inclusion of Electromagnetic Interference (EMI) provisions and will continue to engage with Network Rail in</p>

Reference	Written Representation Comment	Applicants' response
	<p>the face of the draft Order (Part 8 of Schedule 10). However, the current protective provisions are inadequate insofar as they do not contain the Electro Magnetic Interference ("EMI") provisions.</p> <p>It is imperative that the EMI provisions are included in the draft Order. The EMI provisions provide a high-level approval process and set out steps to determine the EMI levels at the appropriate stages in the Project. The purpose of these provisions is to ultimately protect Network Rail's apparatus from EMI. Network Rail submits that, in order to effectively protect its assets, the EMI provisions must be included. Accordingly, at present Network Rail objects to the draft Order on the basis that it does not include protective provisions in Network Rail's standard form.</p> <p>Network Rail does not object in principle to the Project, however, Network Rail requires in addition to the Protective Provisions, the Applicant to enter into a Framework Agreement to manage the direct interface that the Project has with the operational railway. Network Rail and the Applicant are in early discussions in relation to such a Framework Agreement.</p> <p>Network Rail may also require an Asset Protection Agreement where works are significantly close in location and disruptive in nature to the operational railway network. Such agreements are well precedented to ensure the appropriate and necessary technical, engineering and safety requirements for working on, over or near Network Rail's operational railway are applied to the Project. Due to the location of the Applicant's proposed works, Network Rail requires an Asset Protection Agreement in order to carry out its statutory duty.</p> <p>Network Rail has made contact with the Promoter with a view to agreeing the Protective Provisions and entering into related agreements. These negotiations are at a very early stage. Network Rail maintains that the following requirements as set</p>	<p>relation to the protective provisions at Part 8 of Schedule 10 to the draft DCO (C1/F04).</p> <p>The Applicants further acknowledge the need for a Framework Agreement and, where appropriate, an Asset Protection Agreement. The Applicants are progressing discussions with Network Rail in relation to each of these.</p>

Reference	Written Representation Comment	Applicants' response
	out in Section 4 must be met in order for it to remove its objection.	
REP1-094 094.4	<p>Removal of objection</p> <p>If the following criteria are met, then it is anticipated that Network Rail would be in a position to withdraw the objections made above:</p> <ol style="list-style-type: none"> 1. Network Rail's required amendments to the Protective Provisions are to be included in the Order for the Project; 2. the Promoter enters into a Framework Agreement, any required easement, licences and Asset Protection Agreements or any other required agreements are entered into in respect of addressing both the acquisition of rights over and/or temporary use of Network Rail's existing operational land; and 3. Network Rail is granted with clearance and any necessary regulatory consents to enter into any of the agreements referred to above following internal consultation with affected stakeholders across the business. <p>Network Rail reserves its position both in representation and in submissions at hearings to seek the amendments to the draft Order to ensure protective provisions are interest for the benefit of Network Rail's operational infrastructure which is affected by the Project.</p>	<p>The Applicants note Network Rail's position and remain committed to engaging with Network Rail to seek to resolve the matters raised in its written representation (REP1-094). The Applicants will continue to work with Network Rail to finalise the protective provisions and associated agreements as appropriate.</p>

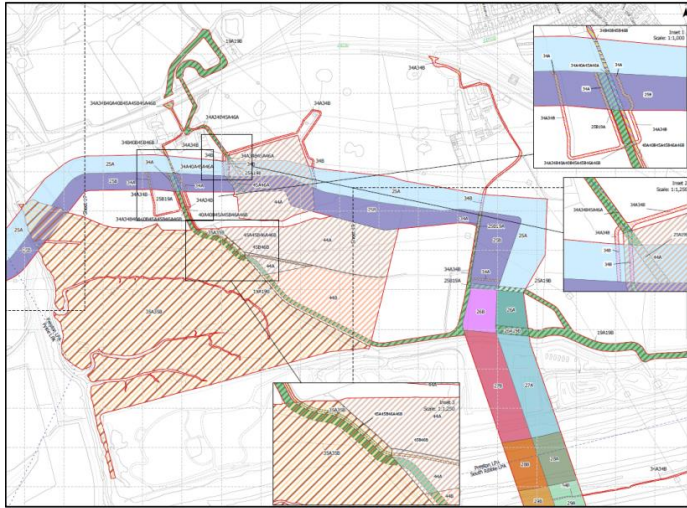
2.13 Preston City Council

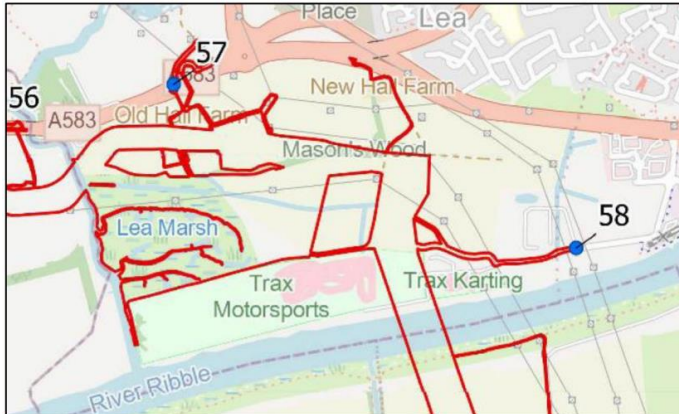
Table 2.10: REP1-095 –Preston City Council

Reference	Written Representation Comment	Applicants' response
REP1-095 095.1	<p>1. INTRODUCTION</p> <p>1.1.1. This Relevant Representation is submitted by Preston City Council in respect of the Morgan and Morecambe Transmission Assets. The report aims to set out the proposals and constraints which specifically impact the administrative area of Preston City Council so that these can be appropriately considered as part of the Development Consent Order (DCO).</p> <p>1.1.2. Furthermore, the report will highlight the relevant development plan policies from both the existing development plan and the emerging development plan which is expected to be at Regulation 19 following consideration by the full Council on the 30th January 2025. The emerging development plan is expected to be adopted in December 2026. A copy of the emerging development plan can be accessed on the Council's website at the following address: https://www.preston.gov.uk/article/2270/Central-Lancashire-Local-Plan</p>	The Applicants note Preston City Council's response.
REP1-095 095.2	<p>2. LOCATION AND SETTING WITHIN PRESTON</p> <p><u>2.1. Location</u></p> <p>2.1.1. The proposed transmission infrastructure would be located on the southwestern edge of the district area of the City of Preston within the open countryside, close to the boundary with Fylde Borough Council. The area of Preston to be affected is located west of Preston Docks and north of the River Ribble within the National Character Area</p>	The Applicants note Preston City Council's response regarding the location and setting of the Transmission Assets in relation to Preston.

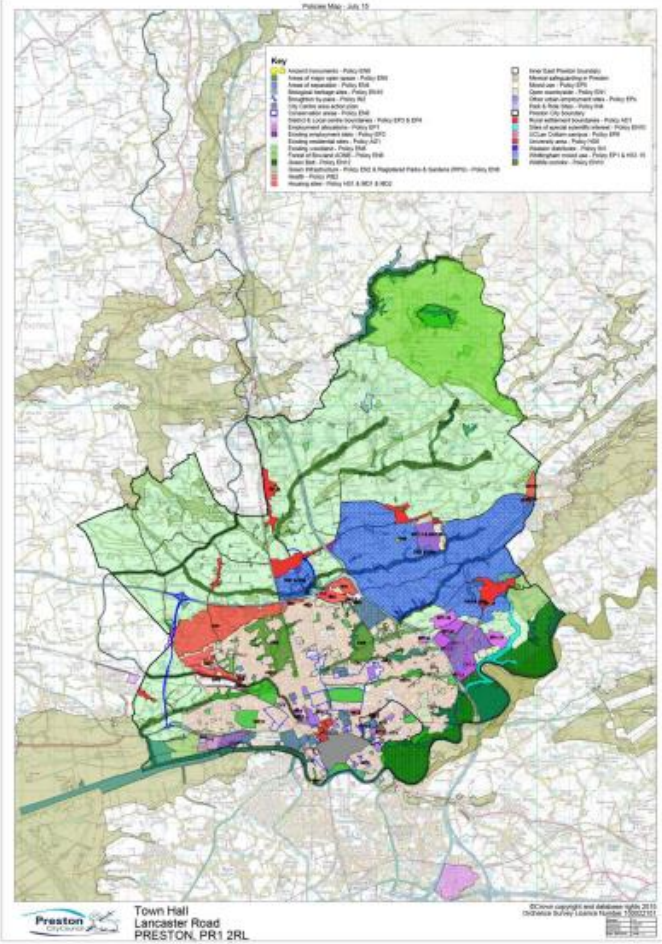
Reference	Written Representation Comment	Applicants' response
	<p>'Lancashire and Amounderness Plain' and MCA 34: Blackpool Coastal Waters and Ribble Estuary.</p> <p><u>Heritage</u></p> <p>2.1.2. There are four listed buildings located to the north and within 120m of the proposed works. One of the listed buildings is Grade I listed and three are Grade II listed. Details of the listed buildings are provided below:</p> <ul style="list-style-type: none"> • Old Lea Farmhouse Blackpool Road (Grade I listed) • The Stable Block circa 50 Meters South of Old Lea Hall Farmhouse (Grade II listed). • Barn circa 120 Metres Southeast of Old Hall Farmhouse (Grade II listed) • Barn circa 75 Meters North of New Hall Farmhouse (Grade II listed) <p>All the listed buildings are located north of the proposed cable corridor south of the A583.</p> <p><i>Figure 1 – Listed Buildings</i></p>  <p>Taken from https://www.preston.gov.uk/planningpublicmaps</p>	

Reference	Written Representation Comment	Applicants' response
REP1-095 095.3	<p><u>2.2. Extent of the works within the City of Preston Cable Corridor</u></p> <p>2.2.1. The proposed transmission infrastructure would include approximately 630m of cable corridor which would enter on the western boundary of Preston, south of the A583 Blackpool Road. The cable corridor would travel under the Savick Brook, which runs in a north-south direction. The cable corridor would travel in an easterly direction heading slightly northwards to avoid Lea Marsh. Once past Lea Marsh the cable corridor would turn southwards and travel towards the River Ribble. This first phase of the corridor would travel through agricultural land.</p> <p>2.2.2. The 265m of cable corridor prior to the River Ribble would travel through a motor sports site known as Phoenix Park. The Phoenix Park site has planning permission for motocross and go karting uses and allows camping related to operations at the site including those attending competitions (06/2021/1413) and children receiving education and training (06/2024/0822) at the site.</p> <p>2.2.3. The proposed cable corridor would then travel under the River Ribble and into the authority area of South Ribble.</p>	<p>The Applicants note Preston City Council's response, .</p> <p>Specifically, the following comments are provided in response to 2.2.2:</p> <p>Application 06/2021/1413: Trax Motor Sport, the motor sport site at Phoenix Park, was operational at the time of the DCO submission, and is thus considered as a part of the baseline.</p> <p>Application 06/2022/1110, which is the original reference number for application 06/2024/0822 and an amendment to planning permission 06/2022/1110, comprised changes to the wording of condition no.2 (non-material amendment not subject to consultation). This has been considered in the CEA at the ES submission stage (refer to ID number 820, Volume 1, Annex 5.5: Cumulative screening matrix and location plan of the ES (REP1-020)).</p>

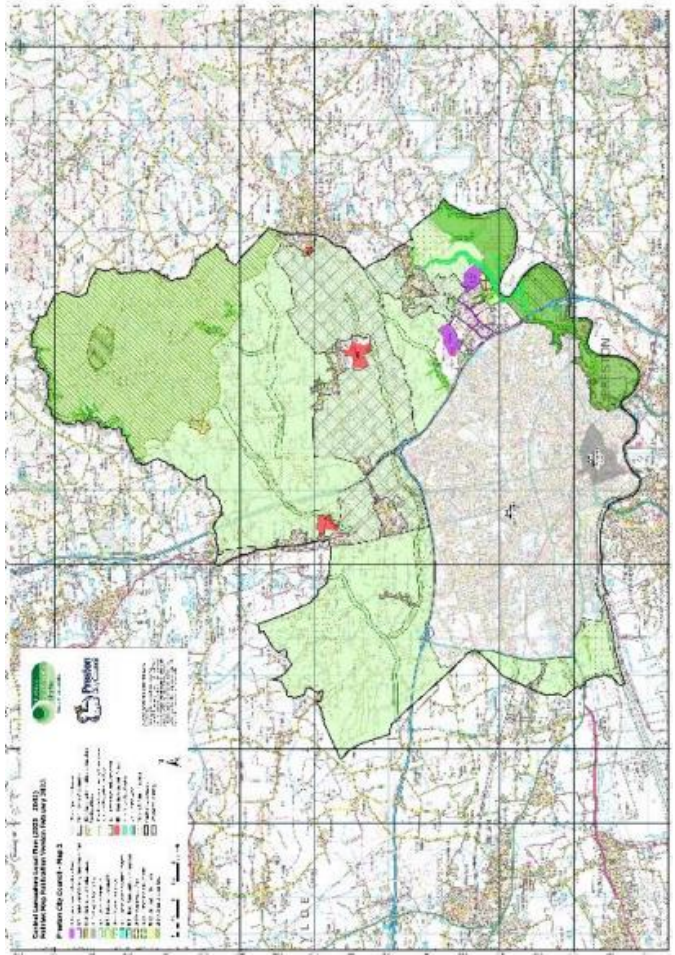
Reference	Written Representation Comment	Applicants' response
	<p><i>Figure 2 – Plan of works proposed within the district area of Preston</i></p>  <p>Figure 2 extract of Works Plan – Sheet 18 of 21, Works Plans Part 2, Drawing. No. BP-GBR-MORG-REG-0175</p> <p><u>Temporary Accesses</u></p> <p>2.2.4. The proposed works would utilise some existing access points as well as constructing two new accesses points for construction vehicles. Two access points would be created as shown on Figure 1.2 Construction Highways Accesses and Haul Road Crossing Points (East) IDs 57 and 58 (Outline Highway Access Management Plan). The first access and egress would be created off the A583 Blackpool Road, and the second off Wallend Road.</p>	

Reference	Written Representation Comment	Applicants' response
	<p>Figure 3 – Temporary Access Points</p>  <p>Figure 3 extracted from Figure 1.2 Construction Highway Access and Haul Road Crossing Points (East) Drawing No. 11255-0012-04.</p> <p><u>Mitigation</u></p> <p>2.2.5. The area of Lea Marsh would include temporary biodiversity mitigation during the construction phase of the development as well as a permanent biodiversity enhancement scheme on its eastern side to provide mitigation to offset the harm to biodiversity, which would be caused by the proposed development.</p>	
REP1-095 095.4	<p>3. DEVELOPMENT PLAN</p> <p><u>3.1. Current Development Plan</u></p> <p>3.1.1. The current Development Plan is made up of the Central Lancashire Core Strategy 2012 and the Preston Local Plan 2012-2026. The policies detailed below would be relevant to the proposed DCO. Extracts of proposed policies are available in Appendix A whilst the documents can be accessed via the planning policy page on the</p>	The Applicants note Preston City Council's response.

Reference	Written Representation Comment	Applicants' response																								
	<p>Council's website: https://www.preston.gov.uk/article/928/Planning-policy.</p> <table><thead><tr><th>Core Strategy</th><th>Local Plan</th></tr></thead><tbody><tr><td>Policy 1 Locating Growth</td><td>Policy ST2 General Transport Considerations</td></tr><tr><td>Policy 2 Infrastructure</td><td>Policy EN1 Development in the open countryside</td></tr><tr><td>Policy 15 Skills and Economic Inclusion</td><td>Policy EN7 Land Quality</td></tr><tr><td>Policy 16 Heritage</td><td>Policy EN8 Development and Heritage Assets</td></tr><tr><td>Policy 20 Countryside Management and Access</td><td>Policy EN10 Biodiversity and Nature Conservation</td></tr><tr><td>Policy 21 Landscape Character Areas</td><td>Policy EN11 Species Protection</td></tr><tr><td>Policy 22 Biodiversity and Geodiversity</td><td></td></tr><tr><td>Policy 28 Renewable and Low Carbon Energy Schemes</td><td></td></tr><tr><td>Policy 29 Water Management</td><td></td></tr><tr><td>Policy 30 Air Quality</td><td></td></tr><tr><td>Policy 31 Agricultural Land</td><td></td></tr></tbody></table>	Core Strategy	Local Plan	Policy 1 Locating Growth	Policy ST2 General Transport Considerations	Policy 2 Infrastructure	Policy EN1 Development in the open countryside	Policy 15 Skills and Economic Inclusion	Policy EN7 Land Quality	Policy 16 Heritage	Policy EN8 Development and Heritage Assets	Policy 20 Countryside Management and Access	Policy EN10 Biodiversity and Nature Conservation	Policy 21 Landscape Character Areas	Policy EN11 Species Protection	Policy 22 Biodiversity and Geodiversity		Policy 28 Renewable and Low Carbon Energy Schemes		Policy 29 Water Management		Policy 30 Air Quality		Policy 31 Agricultural Land		
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	<p>Figure 4 – Local Plan 2012-2026 Policies Map (double click map to enlarge)</p>  <p>Town Hall Lancaster Road PRESTON, PR1 2RL</p>	
REP1-095	3.2. Emerging Development Plan	The Applicants note Preston City Council's response.

Reference	Written Representation Comment	Applicants' response
095.5	<p>3.2.1. As noted in the introduction, a new Development Plan is being developed for Preston City Council, which is expected to reach Regulation 19 on the 30th January 2025 following consideration at the City Council's Full Council meeting. The new Development Plan is expected to be adopted in December 2026. The following proposed policies should therefore be considered as part of the proposal, extracts are provided in Appendix A:</p> <p style="text-align: center;">Emerging Development Plan</p> <hr/> <p>Policy SS1 Development Patterns</p> <hr/> <p>Policy EC9 Skills and Economic Inclusion</p> <hr/> <p>Policy EN4 Amenity</p> <hr/> <p>Policy EN5 Green Infrastructure</p> <hr/> <p>Policy EN6 Biodiversity Net Gain</p> <hr/> <p>Policy EN7 Designated Sites for Nature Conservation</p> <hr/> <p>Policy EN8 Trees, Woodlands and Hedgerows</p> <hr/> <p>Policy EN9 Species Protection</p> <hr/> <p>Policy EN10 Development and Flood Risk</p> <hr/> <p>Policy EN13 Heritage Assets and Archaeology</p> <hr/> <p>Policy EN14 Environmental Quality</p> <hr/> <p>Policy EN16 Protection of Agricultural Land</p> <hr/> <p>Policy EN17 Development in the Open Countryside</p> <hr/> <p>Policy EN19 Landscape Character</p> <hr/> <p>Policy CC1 (Strategic Policy): Climate Change</p> <hr/> <p>Policy CC2 Renewable Energy Generation and District Heating Networks</p> <hr/> <p>Policy ST1 (Strategic Policy): Strategic Transport Priorities</p> <hr/> <p>Policy ID1 (Strategic Policy): Infrastructure Planning Principles</p>	<p>The Applicants also refer Preston City Council to the Applicants' response to Hearing Action Point ISH1 2: Planning Statement Addendum (S_D2_9).</p>

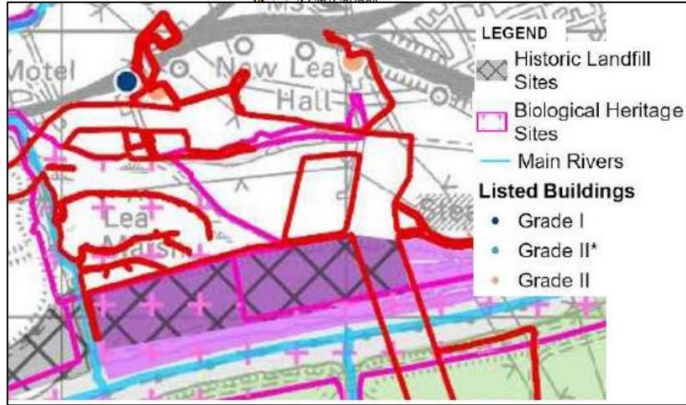
Reference	Written Representation Comment	Applicants' response
	<p>Figure 5 – Emerging Development Plan Policies Map (double click map to enlarge)</p> 	

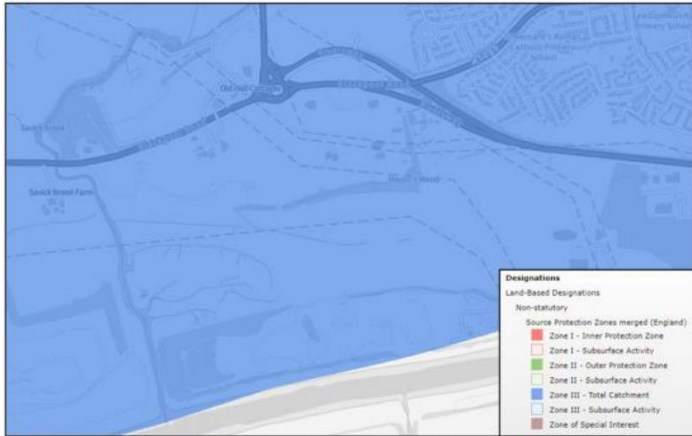
Reference	Written Representation Comment	Applicants' response
REP1-095 095.6	4. COMMENTS ON THE PROPOSED WORKS 4.1. Landscape 4.1.1. The proposed cable corridor would be located in the open countryside within the National Character Area 'Lancashire and Amounderness Plain' and MCA 34: Blackpool Coastal Waters and Ribble Estuary.	The Applicants refer to response RR1775.1 provided in Procedural Deadline A Submission - Annex 3.2.22 to Response to RR – Preston City Council (RR-1775) (PDA-029) and section 1.3.2.2 and Appendix A of ES Volume 3, Annex 10.2: Landscape character baseline technical report and ES Volume 3, Chapter 10: Landscape and visual resources which address these points.
REP1-095 095.7	4.1.2. This Development Consent Order is for a large-scale project and the submitted documents follows best practice making reference to Landscape and Visual assessment being in accordance with Visual Impact Assessment: Third Edition, 2013, Landscape Institute and Institute of Environmental Management and Assessment (GLVIA3). Additionally, Landscape Institute technical guidance notes are also referred to.	The Applicants thank Preston City Council for confirming that the Landscape and Visual Impact Assessment has followed best practice.
REP1-095 095.8	4.1.3. The baseline survey & site analysis is comprehensive and there is reference to relevant standards concerning landscape and visual features, eg hedgerow regulations. It also refers to Preston Local Plan 2012-26 Policy EN3.	The Applicants thank Preston City Council for confirming that the baseline survey and site analysis for the Landscape and Visual Impact Assessment is comprehensive, and appropriate references have been made to landscape and visual features and the Preston Local Plan 2012 – 26, Policy EN3. Full details of the Applicants' compliance with Preston Local Plan are detailed in the Local Planning Policy Tracker (APP-236)
REP1-095 095.9	4.1.4. The transmission route would enter the Preston district boundary in the Clifton Marshes area and then runs through Lea Marsh and across the River Ribble to the south. The proposed works would therefore run through the Biological Heritage Sites of Lea Marsh and the River Ribble Lower Tidal Section. From the data included, the works within the Preston district boundary would be pipeline installation and no structures will be erected above ground in this area. Based on the submitted information the impact on the character of the landscape will be	The Applicants refer to response RR1775.4 provided in Procedural Deadline A Submission - Annex 3.2.22 to Response to RR – Preston City Council (RR-1775) (PDA-029) which addresses these points.

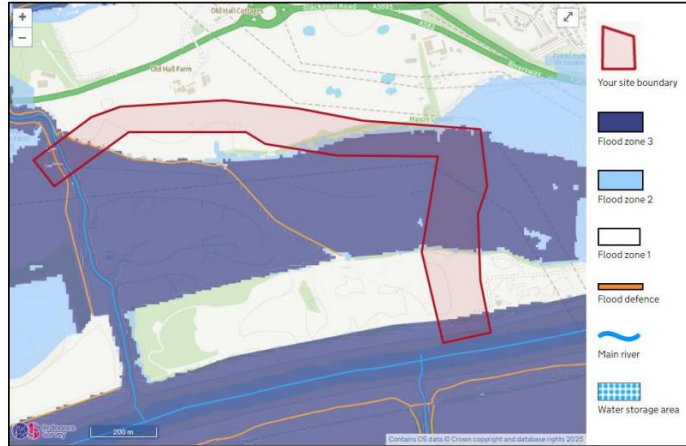
Reference	Written Representation Comment	Applicants' response
	greatest during the pre-construction and construction phases.	
REP1-095 095.10	4.1.5. If the works were to go ahead then disturbance and damage to the Biological Heritage Sites appears inevitable as will some loss of other landscape features, such as trees & hedgerow. Preston City Council would therefore encourage detailed analysis of the design with the aim of reducing this impact where possible. Biodiversity enhancement is proposed adjacent to the east side of Lea Marsh, which would fall within the district area of Preston and the final scheme should demonstrate that this adequately compensates for any harm. Additionally, the said scheme will need to ensure that it does not adversely change or harm the existing character of the area. Finally, in view of the distinctive level topography in the area of the proposed development the Council would expect changes to finished ground level to be avoided and where they cannot be that they are kept to a minimum, in order to retain and avoid harm to the existing character of the area.	The Applicants refer to response RR1775.5 provided in Procedural Deadline A Submission - Annex 3.2.22 to Response to RR – Preston City Council (RR-1775) (PDA-029) which addresses these points.
REP1-095 095.11	<p><u>4.2. Heritage</u></p> <p><u>Archaeology</u></p> <p>4.2.1. Lancashire County Council's Historic Environment Team provides advice to Preston City Council on archaeology matters. They have indicated that they have been in discussions with the applicants on the proposed works undertaken so far and are content with the assessment and survey work that has been, and remains to be, undertaken in assessing the archaeological potential of the proposed development corridor.</p> <p><u>Listed Buildings</u></p> <p>4.2.2. As detailed in Section 2.1 above, there are 4no. listed buildings within two farmsteads, Old Lea Hall Farm</p>	<p><u>Archaeology</u></p> <p>The Applicants thank Preston City Council for confirming that Lancashire County Council's Historic Environment Team are content with the assessment and survey work that has been and remains to be undertaken in assessing the archaeological potential of the Transmission Assets. The Applicants will continue to liaise with the Historic Environment Team at Lancashire County Council and will provide any updates at the next iteration of the Outline Onshore and Intertidal Written Scheme of Investigation (APP-214). The Applicants also refer to response RR1775.6 provided in Procedural Deadline A Submission - Annex 3.2.22 to Response to RR – Preston City Council (RR-1775) (PDA-029) and Annex 3.2.5 to Response to RR - Lancashire County Council (RR-1262) (PDA-012) which address these points further.</p>

Reference	Written Representation Comment	Applicants' response
	<p>(3no. listed buildings including a Grade I listed building) and a Grade II listed barn located 75 metres north of new hall farmhouse, lie in close proximity to the proposed works, as detailed in Figure 6 below. There is a potential for the setting of these buildings to be impacted during the proposed works. This is because the proposed works would involve a large engineering operation to dig the trenches and bury the proposed cables underground, with a cable corridor 75m wide. The machinery and materials required, if stored close to these buildings would have the potential to negatively impact their rural setting and be at odds with the rural character of the area.</p> <p>4.2.3. Furthermore, the scheme proposes to use the existing accesses to the above farmsteads to access the proposed works with one intended to be permanent. Whilst there may be a benefit to not creating additional access off the highway, which could have an urbanising effect on the character of the area, routing traffic past the listed buildings has the potential to cause damage. Firstly, through vibrations from heavy machinery traveling in close proximity to the buildings and secondly by increasing the amount of traffic, which would increase the chance of an accident that as a result, could cause damage to a listed building. It is however acknowledged that these risks would presumably only be for the duration of the works with only limited access likely to be required to the Biological Heritage Site following completion of the works.</p> <p>4.2.4. Notwithstanding the above, officers remain concerned with regards to the impact the proposed works would have on the special historic significance and setting of the aforementioned listed buildings, particularly the Grade I listed Old Lea Hall Farmhouse. Officers would therefore strongly discourage the proposed use of the existing access to Old Lea Hall farm to facilitate the</p>	<p><u>Listed Buildings/Access</u></p> <p>Access is required in the vicinity of Lea Old Hall Farm to serve the 400 kV grid connection cable corridor between the A583 and River Ribble. The Applicants refer to B11 Access to Works Plan, Sheet 16 (APP-157); to access this section, traffic would utilise access TAT_MGMC_57, shown on the Access to Works Plan (APP-157) to the north of the A583m, before travelling over the A583 on the existing overbridge.</p> <p>The Applicants note that this bridge is subject to a 32 tonne weight limit and also forms part of the Preston Guild Wheel cycle route. Consequently, appropriate management measures are proposed within an update to the Outline Construction Traffic Management Plan (OCTMP) submitted at Deadline 2 (J5/F02). These measures would manage the interface between all users of the overbridge and limit the size of vehicles.</p> <p>The measures consist of construction vehicles first being required to travel to the temporary construction compounds located on the A583 Blackpool Road and A584 Preston New Road. Material deliveries would be broken down/divided on to smaller HGVs, such that the gross vehicle load does not exceed 30 tonnes (i.e. below the overbridge weight limit) and employees would also be grouped into vehicles to reduce single occupancy trips.</p> <p>Before departing the temporary construction compounds, drivers would be required to ensure that a banksperson is in place. Once the banksperson is in place (one either side of the bridge) they will radio the driver to advise them to proceed and temporarily stop any users of the overbridge until the construction traffic has cleared the bridge.</p> <p>To support the banksperson in their duties, warning signs would also be erected either side of the overbridge. Noting these restrictions, use of the construction access route which passes through the farmyard at Old Lea Hall Farm would be limited to vehicles of no more than 30 tonnes. The Applicants refer to response REP1-208 208.2 in regard to the management of vibration from construction activities.</p> <p>The Applicants' assessment of the likely effects of the Transmission Assets on the listed buildings at Old Lea Hall Farm is presented in ES Volume 3, Chapter 5: Historic environment (APP-096), with further details set out in ES</p>

Reference	Written Representation Comment	Applicants' response
	<p>construction of this part of the cable line. This is due to the proximity of the works to existing designated heritage assets and the potential harm that could be caused to them, particularly to the existing Grade I listed building, which forms part of the only surviving domestic range of a late-medieval manor house of the de Hoghton family (late C17/early C18). We would therefore request that alternative access points are explored that are not located in such close proximity to protected historic buildings.</p> <p>4.2.5. The proposed works will impact the landscape, and the level of harm would be dependent on the exact nature of the restoration. If the cable corridor is returned to its pre-development character, then there would presumably be no long-term impact. However, if the character of the land was altered by the proposed works, then this could affect the setting of the listed buildings. The level of change would determine the level of harm. However, the restoration of the site to its pre-existing character could be suitably controlled by condition in order to preserve the heritage assets.</p> <p><i>Figure 6 – Constraints</i></p>	<p>Volume 3, Annex 5.5: Settings assessment (APP-102). The assessment concludes that there would be a minor adverse effect in respect of the Grade I listed Old Lea Farmhouse and the two Grade II listed auxiliary farm buildings. The effects would occur during construction and would be short or medium term and fully reversible. These are not significant effects in EIA terms.</p> <p>The Applicants consider that the likely effects on the listed buildings as a result of change within their setting represents less than substantial harm to their significance. In accordance with the policy established in paragraph 5.9.32 of the Overarching National Policy Statement for Energy (NPS-EN1) this harm should be weighed against the public benefits of the Transmission Assets. The Applicants refer to paragraph 2.3.8 of the National Policy Statement for renewable energy infrastructure (NPS-EN3) which states '<i>In considering the impact of the historic environment as set out in Section 5.9 of EN-1 and whether the Secretary of State is satisfied that the public benefits would outweigh any harm or loss to the significance of a designated heritage asset, the Secretary of State should take into account the positive role that large-scale renewable projects play in the mitigation of climate change, the delivery of energy security and the urgency of meeting the net zero target</i>'.</p> <p>Articles 29(4) and 29(5) and Requirement 16 of Schedules 2A & 2B of the draft DCO (C1/F04) requires land used for temporary construction of the Project A or Project B onshore works and Project A or Project B intertidal works to be reinstated within 12 months following completion of the relevant stage of works in accordance with the details approved by the relevant planning authority to ensure there will be no long term effects on the listed buildings.</p>

Reference	Written Representation Comment	Applicants' response
	 <p>Extract from Figure 8.2b Onshore environmental Constraints Drawing No. 12693-0358-04</p>	
REP1-095 095.12	<p><u>4.3. Ground Contamination and Ground Water</u></p> <p><u>Ground Contamination</u></p> <p>4.3.1. The proposed cable corridor would cut through a site known as Phoenix Park located off Wallend Road and running adjacent to the northern boundary of the River Ribble. This site is located over a historic landfill, Lea Marsh, (see Figure 6 above) which was historically used to deposit dredgings from the River Ribble.</p> <p>4.3.2. The Council's Environmental Health Officer has reviewed the Phase 1 Geo-environmental preliminary risk assessment and is satisfied with its recommendation for a Phase 2 Intrusive Ground Investigation followed by the production a Remediation Strategy, Validation Sampling and finally a Verification Report where required. They agree with the proposed watching brief for any contaminated land that has so far been undiscovered during construction. These proposals should be secured by condition to ensure contaminated land is appropriately</p>	<p>The Applicants refer to response RR1775.7 provided in Procedural Deadline A Submission - Annex 3.2.22 to Response to RR – Preston City Council (RR-1775) (PDA-029) which addresses these points.</p>


Reference	Written Representation Comment	Applicants' response
	<p>dealt with so that it does not pose a risk to human health, ground water or the wider environment.</p> <p><u>Ground Water</u></p> <p>4.3.3. The cable corridor route through Preston is wholly within Ground Water Protection Zone III total catchment (see Figure 7 below). Given the corridor will cross through a historic landfill site, the development must ensure that both the construction works and the built development does not allow contaminants to migrate to impact upon the underlying Ground Water Source Protection Zone.</p> <p><i>Figure 7 – Groundwater Source Protection Zones</i></p>  <p>Groundwater data obtained from https://magic.defra.gov.uk/MagicMap.aspx</p>	
REP1-095 095.13	<p>4.4. Flood Risk</p> <p>4.4.1. The proposed cable corridor will be partially located within Flood Zone 3 (see Figure 8 below). Flood Zone 3 is identified where it crosses Savick Brook, south of Mason's Wood and adjacent to the River Ribble. The built development would be buried underground and so would</p>	<p>The Applicants refer to response RR1775.8 provided in Procedural Deadline A Submission - Annex 3.2.22 to Response to RR – Preston City Council (RR-1775) (PDA-029) which addresses these points.</p>

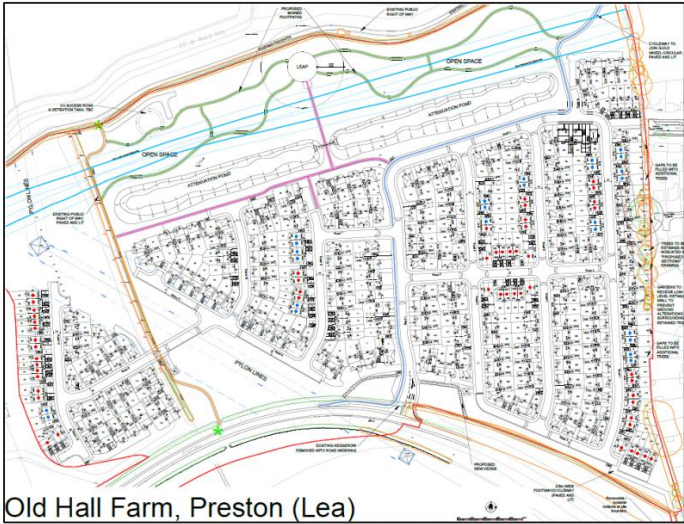
Reference	Written Representation Comment	Applicants' response
	<p>be unlikely to be impacted by or impact upon flood risk. However, construction work would be at risk from flooding and could increase flood risk offsite, if flood water were to be displaced by the works. The impacts of development could be controlled by a condition requiring a construction water management plan.</p> <p><i>Figure 8 – Flood Zones</i></p>  <p>Mapping taken from GOV.UK Flood map for planning</p>	
REP1-095 095.14	<p>4.5. Amenity</p> <p>4.5.1. The closest neighbouring property to the proposed construction works is at Old Hall Farm, adjacent to the northern edge of the cable corridor and with construction and permanent access arrangements proposed through the farmstead. New Hall Farm is located 60m north of the proposed corridor and the proposals include a permanent access proposed through the farmstead. Old Hall Cottages, a pair of semi-detached properties located approximately 255m north of the cable corridor and 15m east of a proposed works access onto A583 Blackpool</p>	<p>The Applicants refer to response RR1775.9 provided in Procedural Deadline A Submission - Annex 3.2.22 to Response to RR – Preston City Council (RR-1775) (PDA-029) which addresses these points.</p>

Reference	Written Representation Comment	Applicants' response
	<p>Road. Phoenix Park is located on top of part of the route of the proposed cable corridor and the proposed compound locations for drilling under the River Ribble (as detailed on Works Plan – Sheet 18 of 21 Drawing No. BP-GBR-REG-0175) are proposed to be located adjacent to its north boundary.</p> <p>4.5.2. Both farms include farmhouses, Old Hall Cottages are in residential use and the Phoenix Park development includes accommodation for those attending events at the site and children in care (see section 4.6 for further details on Phoenix Park).</p> <p>4.5.3. The closest main urban area of Preston is Lea and Larches located north of the proposed works. The closest existing property is approximately 385m north of the proposed works located on the north side of the A5085. A new housing development is also under construction north of the A583 Riversway (outline 06/2018/0885, reserved matters 06/2022/1177) with permission for 280no. dwellings.</p> <p>4.5.4. It is unclear how long the proposed works within the district area of Preston would take or at what stage of the proposal they would be undertaken, but given the close proximity to places of residents, there will clearly be a potential for construction works to impact upon amenity of said residents. The operation of the cable infrastructure would not impact upon amenity. Whilst some maintenance of the biodiversity gain site would presumably require visits to inspect and undertake maintenance. Assuming these were undertaken in normal working hours 8am-6pm, they would be unlikely to have an unacceptable detrimental impact. This could be controlled by a suitable management plan.</p>	

Reference	Written Representation Comment	Applicants' response
	<p>4.5.5. The Council's Environmental Health Officer has reviewed the submitted information relating to Noise and Vibration, Air Quality, Dust Management, Pollution Prevention, Artificial Light Management, Construction Noise and Vibration Management and Statutory Nuisance etc. They note that a best practice approach has been taken in all reports and undertaken with reference to all relevant legislation and standards.</p> <p>4.5.6. With regards to the proposed measures to control air quality and dust management, noise and vibration, artificial lighting, and pollution prevention are satisfactory. The Officer notes that the recommended hours of working within Preston for construction or demolition works to protect the amenity of local residents are: Monday to Friday 08:00 – 18:00hrs, Saturday 08:00 – 13:00hrs, and No time on a Sunday or Bank Holidays. In contrast the submission proposes: Core working hours for the construction of the intertidal and onshore works will be as follows: Monday to Saturday: 07:00 - 19:00 hours; and up to one hour before and after core working hours for mobilisation ("mobilisation period") i.e. 06:00 to 20:00. As identified above, there are nearby properties and Phenix Park development which would likely be adversely impacted by the proposed working hours. We would request that the use of Preston's standard working hours be considered to reduce the impact works would have on these receptors. Additionally, the recommendations put forward in the submitted technical reports for further work and mitigation measures should be conditioned.</p>	
REP1-095 095.15	<p><u>Community engagement</u></p> <p>4.5.7. The DCO submission includes an Outline Communication Plan (Document reference J1.1) which sets out that neighbours and key stakeholders will be</p>	<p>The Applicants refer to response RR1775.10 provided in Procedural Deadline A Submission - Annex 3.2.22 to Response to RR – Preston City Council (RR-1775) (PDA-029) which addresses these points.</p>

Reference	Written Representation Comment	Applicants' response
	communicated with. Specifics are to be agreed once contractors are appointed. Councillors are a main point of contact for many members of the public and would likely be contacted if residents have concerns or issues arise. The wards in which work is being undertaken in or in close proximity to, the ward Councillors for these areas should be kept informed of the program of works and have a point of contact to raise any concerns with.	
REP1-095 095.16	<p><u>4.6. Consented Development</u></p> <p><u>Phoenix Park</u></p> <p>4.6.1. The proposed cable corridor will travel through a site known as Phoenix Park, which is located on the northern bank of the River Ribble and extends from Savick Brook in the west to Wallend Road in the east. The site currently provides for the training and education of children in care together with public access to the motocross and go karting uses. People attending competitions at the site are able to stay at the site overnight and the site includes 16 lodges for occupation by children in care (06/2024/0822).</p> <p>4.6.2. The site has extant permission for a four storey education, training and leisure facility with associated sports pitches (06/2024/0651) which the Council understands has lawfully commenced. Additionally, the application site benefits from an extant permission 06/2023/0245 for a leisure development including dry ski slope, mountain bike track and creation of a leisure lake, which was approved in August 2023.</p> <p>4.6.3. At this stage, it is not known when, or if the approved development at the site will be fully built out. However, the proposed development presents an opportunity to enhance the leisure and training facilities, which would provide social, economic and environmental benefits. Social benefits would be provided through the</p>	The Applicants refer to response RR1775.11 provided in Procedural Deadline A Submission - Annex 3.2.22 to Response to RR – Preston City Council (RR-1775) (PDA-029) which addresses these points.

Reference	Written Representation Comment	Applicants' response
	<p>provision of sports facilities for the general public and training and education opportunities for children in care. Economic benefits through the building, operation and jobs, which would be created by the development. Finally environmental benefits would be achieved through the redevelopment of the site, which would allow remediation of contamination at the site and through delivery of biodiversity net gain. As such the proposed transmission infrastructure should ensure that this development would not be prevented from being brought forward.</p> <p><i>Figure 9 – Proposed Development at Phoenix Park</i></p>  <p>Extract of Location Plan Drawing No. LP-C-01 Rev B submitted under application 06/2023/0245</p> <p><u>Land off Riversway</u></p> <p>4.6.4. There is an ongoing development north of Riversway (outline 06/2018/0885, reserved matters 06/2022/1177) which covers approximately 14.5ha of land, which has approval for 280no. dwellings. It is bound to the north by the Guild Wheel Cycle Route, to the east by existing residential development, to the south by Riversway and to the west by the Edith Rigby Way. As the approved development has commenced there will be additional receptors close to the proposed cable corridor. The impacts of the development on these dwellings should be considered as some will likely be delivered prior to works commencing on site if a DCO is granted.</p>	

Reference	Written Representation Comment	Applicants' response
	<p>Figure 10 – Riversway Site Plan</p>  <p>Old Hall Farm, Preston (Lea) Extract of Site Layout Plan approved under application 06/2022/1177</p>	
REP1-095 095.17	<p>4.7. Highways</p> <p>4.7.1. Highways comments are being prepared separately by Lancashire County Council as the Highways Authority.</p> <p>4.7.2. The City Council notes that access to the proposed works would in part be provided by the M6, M55 and Edith Rigby Way, which are major transport routes used by residents of and those who work within Preston. As such any significant increase in traffic or road closures would likely have wide reaching impact which any DCO approval will need to consider and appropriately control.</p> <p>4.7.3. Consideration will also need to be given to the potential cumulative traffic impacts with Edith Rigby Way providing highways capacity for the planned urban expansion of Preston as allocated under the current Local</p>	<p>The Applicants refer to response RR1775.12 provided in Procedural Deadline A Submission - Annex 3.2.22 to Response to RR – Preston City Council (RR-1775) (PDA-029) which addresses these points.</p>

Reference	Written Representation Comment	Applicants' response
	Plan. Additionally, the emerging Development Plan includes additional land for housing up to the east side of Edith Rigby Way and to the west side around Bartle Hall Hotel where there is an extant outline permission 06/2020/0888. As such the scheme must ensure that traffic impacts are minimised to prevent an unacceptable cumulative impact on highways infrastructure. Road closures of major routes should be prevented.	
REP1-095 095.18	<p><u>4.8. Ecology</u></p> <p>4.8.1. Ecology comments are being prepared separately by the Greater Manchester Ecology Unit who act as the Council's Ecology advisors.</p> <p>4.8.2. The principle of providing biodiversity gain on the east side of Lea Marsh has the potential to positively enhance biodiversity within the area.</p>	The Applicants refer to response RR1775.13 provided in Procedural Deadline A Submission - Annex 3.2.22 to Response to RR – Preston City Council (RR-1775) (PDA-029) which addresses these points.
REP1-095 095.19	<p>5. CONCLUSIONS</p> <p>5.1.1. The proposed development will impact on the southwestern edge of Preston west of Preston Docks and south of the A583. There are a number of constraints including: its open countryside location and character, nearby listed buildings, a contaminated historic landfill site, groundwater protection zone, flood risk, residential amenity, proposed development in the area, cumulative impact on highways capacity, and ecology.</p> <p>5.1.2. The UK Government has an ambition to deliver 50 GW of offshore wind by 2030. This is part of a range of works aimed at reducing greenhouse gas emissions as a response to climate change. In principle the proposals would work towards this but must ensure that impacts to the local environment from the proposed works are appropriately controlled and minimised. Additionally, the works must not place an unacceptable impact on residents</p>	The Applicants refer to response RR1775.14 provided in Procedural Deadline A Submission - Annex 3.2.22 to Response to RR – Preston City Council (RR-1775) (PDA-029) which addresses these points.

Reference	Written Representation Comment	Applicants' response
	<p>who live close to the proposed works or the road infrastructure relied on by those who live and work in Preston.</p> <p>5.1.3. We trust that this document sets out the constraints and areas of concern which affect the authority of Preston and will be fully considered as part of the DCO application.</p>	

2.14 Royal National Lifeboat Institution

Table 2.11: REP1-096 –Royal National Lifeboat Institution

Reference	Written Representation Comment	Applicants' response
REP1-096 096.1	<p>A 'Teams' meeting was undertaken on the 12th May including representatives from Blackpool and Lytham St Annes Lifeboat Stations, RNLI Regional Management and members of the applicants' technical team.</p> <p>The purpose was to review the applicants' responses (RR-1899.1-3) to the initial concerns raised by the RNLI and to confirm suitability of their clarification and mitigation proposals.</p>	The Applicants note this comment.
REP1-096 096.2	<p>1. Starr Gate Slipway</p> <p>Initial concerns with regard to the continuous availability of this slipway during the works have been allayed. It has been made clear that the slipway will not be fenced, gated or otherwise obstructed and will be used simply for vessel launch in support of cable laying and for vehicle access to the beach as necessary.</p> <p>In the event of an emergency situation, RNLI vehicles and vessels will be prioritised by contractors.</p> <p>The proposed Communications Plan will be updated to include the RNLI.</p>	The Applicants welcome this comment. The Outline Communications Plan (APP-194) will be updated at Deadline 3 to include reference to the RNLI.
REP1-096 096.3	<p>Certain other matters came to light during these discussions which are outlined below:</p> <p>2. Floating Cables</p> <p>We were advised that cables may take up to two days per cable to install and, as a result, there may be instances where a cable is not fully submerged for a period of time.</p>	As set out under Section 3.14.5 of Volume 1, Chapter 3 Project Description of the Environmental Statement (F1.3/F03) flotation devices will be used to bring the offshore export cables from the cable lay vessel to the tide mark (see Plate 3.8 in F1.3/F03 for an example of typical cable floats) during the cable pull-in process. The cable floats will keep the cable on the sea surface at all times. Whether installation occurs during the day or at night, the cable lay vessel will be present at the offshore end of the floating section of the export cable, and a number of rigid inflatable boats (RIBs) will be present

Reference	Written Representation Comment	Applicants' response
	<p>During daylight this shouldn't present any navigational concerns, as we understand there will be support boats and markers used to identify the position of the cable.</p> <p>However, in poor visibility or at night, the presence of a floating or semi-submerged cable is likely to present a risk to lifeboats carrying out shoreline search patterns and there is of course the coincident risk of damage to the cable from hull and propellor strikes.</p> <p>Clarification of the relevant safety measures would be appreciated. At night any floating or semi-submerged cable and associated temporary picket buoy etc should be suitably marked (preferably lit) and notified to the Coastguard, as well as the local lifeboat stations. Our crews can then avoid crossing the line of any cables.</p>	<p>around the floating export cable assisting the export cable pull-in process and acting as guard vessels. It is likely that an intermediate pulling platform will also be present at the transition between the floating section of the export cable and rolled section close to the shore (as set out under Section 3.14.5 of Volume 1, Chapter 3 Project Description of the Environmental Statement (F1.3/F03)). Whilst it is not possible to use visible lighting to mark the location of the floating export cable, all vessels and the intermediate pulling platform shall be displaying lights and local vessel activity will be monitored by the cable lay vessel (and intermediate pulling platform if used) and the Marine Co-ordination Centre. As noted in the response above, the Outline Communications Plan (APP-194) will be updated at Deadline 3 to include the RNLI. During preparation of the final Communications Plan, post-consent, the Applicants can liaise with the RNLI on specific communication requirements, such as daily calls during pull-in procedures to ensure that RNLI are aware of activity and can avoid the floating export cables.</p>
REP1-096 096.4	<p>3. Lytham St Annes Launch Area</p> <p>At this stage we wish to retain a holding objection to the scheme until such time as the impacts on the operational efficiency of the Lytham Lifeboat has been fully established.</p> <p>It has become apparent that the proposed cable entry point on the beach and associated working area coincides with the optimum launch and recovery point for the Lytham St Annes Shannon Class offshore lifeboat.</p> <p>This lifeboat is normally towed in its carriage, using a tracked launch tractor, from the boathouse, along the beach, to a position close to the New Thursby Care Home. This position is used to access the maximum available water depth along this very shallow coastline, thereby ensuring best speed of launch on service.</p>	<p>Annex 5.3 to the Applicants response to Hearing Action Points: ISH1 13, 14, 16, 17 (REP1-040) sets out additional information regarding the works proposed at the Lytham St. Annes Beach to facilitate the landfall of the offshore export cables. REP1-040 includes detailed plans of the proposed working areas (see Figure 1 and Figure 3 in REP1-040), which should provide RNLI with the information required to determine whether there would be a conflict with the RNLI's regular launch area.</p> <p>It should be noted that movement of RNLI lifeboat and launcher across the foreshore between the direct pipe exit pits at the top of the beach and the sea would only be restricted during the export cable pull-in process and beach burial works. This will be up to 6 weeks per cable and up to 36 weeks in total over the construction period. However, during these periods, the Applicants would highlight that REP1-040, and Figure 3 in particular, show that there would be a minimum of 100m between the direct pipe exit pits and the sand dunes of the Lytham St Annes sand dunes Site of Special Scientific Interest (SSSI). This would allow the RNLI to transit past the work area to access launch sites to the north or south of the work area.</p>

Reference	Written Representation Comment	Applicants' response
	<p>Recovery is achieved by driving the boat ashore and then winching it into the carriage, which is then rotated 180 degrees to position the vessel for the next launch.</p> <p>The current development proposals are insufficiently detailed at this stage to define an exact area of conflict between this regular launch area and the proposed works area. However, we have agreed to produce a drawing showing the manoeuvring and launch area that the lifeboat generally uses. This is in process and will be forwarded as soon as completed. We would appreciate further discussions on this point once more detail is available.</p>	<p>The Applicants will arrange a meeting with RNLI to be held in the next few weeks to discuss this matter and allow the parties to provide updates into the Examination at Deadline 3 (7 July 2025).</p>
REP1-096 096.5	<p>Here again, a secondary but important issue for the applicants is that the combined weight of the lifeboat and launching equipment, when fully loaded, totals close to 60 tonnes. The lifeboat itself is some 18 tonnes. We understand the cables will be buried up to 3m deep. However, given that sand levels do vary materially due to longshore drift, and especially as a result of storm impacts (which can scour sand away and /or deposit it quite quickly) the available cover may be reduced from time to time.</p> <p>The applicants will need to consider the likely impacts from such a heavy vehicle passing over and around the cable runs to avoid potential damage.</p>	<p>The Application does not propose any permanent loss of access on the foreshore once the landfall works are complete. The Applicants have considered the matter of the weight of the lifeboat and launching equipment and potential for effects on the buried export cable and cable ducts following RNLI raising the matter at our meeting of 12 May 2025. The Applicants considers that once the export cables and cable ducts are fully installed, there should be no issues with transit of the lifeboat and launching equipment. The Applicants will engage with RNLI on this matter at the meeting proposed to be raised in the next few weeks.</p> <p>The Applicants would also highlight that the Marine Management Organisation (MMO) asked a related question in their relevant representation (RR-1414), which the Applicants have responded to at Deadline 2 (see the Applicants response to RR-1414-23 in Table 3.1 of S_D2_3.2). The MMO asked the Applicants to “<i>confirm their understanding of the risk of future cable exposure (necessitating reworking) under conditions of shoreline retreat; and whether the natural realignment is factored into the landfall location and burial depth design</i>”. The Applicants response is set out below for ease of reference.</p> <p><i>“The Applicants acknowledge the MMO’s request for clarification on the risk of future cable exposure due to shoreline retreat at the landfall location. The detailed assessment of beach level variability, as set out in the Outline Cable Burial Risk Assessment (CBRA, APP-219), identifies intertidal variability of</i></p>

Reference	Written Representation Comment	Applicants' response
		<p><i>up to +/-1.5m. Accordingly, the target Depth of Lowering (DoL) for cable burial has been conservatively established at 3.0 m below beach surface level. This ensures that even under conditions of maximum recorded variability, the minimum burial depth would remain at least 1.5m, sufficient to prevent cable exposure and associated risks.</i></p> <p><i>In terms of shoreline retreat, the analysis undertaken by the Applicants, to inform the CBRA also confirms a trend of sediment accumulation and dune migration seaward, rather than significant shoreline recession, at the selected landfall site. This indicates a limited likelihood of future shoreline retreat posing a risk to the buried cables.</i></p> <p><i>The Applicants confirm that the potential for future shoreline changes, including the scenario of natural realignment and retreat, has been factored into the burial depth design. The design approach adopted incorporates a conservative burial DoL of 3.0m to mitigate the risk of cable exposure due to future beach-level variations, including scenarios involving shoreline retreat."</i></p>

2.15 South Ribble Borough Council

Table 2.12: REP1-097 –South Ribble Borough Council

Reference	Written Representation Comment	Applicants' response
REP1-097 1.1	<p>1. Introduction</p> <p>2. Written representation ('reps') is hereby presented on behalf of South Ribble Borough Council ('the Council') and sets out the Council's thoughts with regards to the aforementioned, proposed development, having regard to, but not repeating relevant representation provided in Jan 2025 which does need to be addressed, and any additional documentation provided by the applicant since that date. Reps are organised by topic, but the order in which they are presented should not be taken to imply any degree of significance.</p> <p>3. The topics covered are as follows:</p> <ul style="list-style-type: none"> • Heritage • Ecological Matters • Public Rights of Way • Other Matters <ul style="list-style-type: none"> ▪ Crown land ▪ Site compounds ▪ Construction Management ▪ River Ribble Crossing <p>4. Topics which are the statutory function of other organisations, and as such the Council defers to those organisations for separate written representation are:</p> <ul style="list-style-type: none"> • Highways/Traffic Management/Transport – Lancashire County Council Highways 	<p>The Applicants note South Ribble's comment and have responded to each point raised below.</p>

Reference	Written Representation Comment	Applicants' response
	<ul style="list-style-type: none"> • Archaeology (excluding Heritage)- Lancashire County Council Archaeology • Drainage/Flood & Water Management - Lancashire County Council Local Lead Flood Authority and the Environment Agency • Public Protection related to power facilities – Lancashire Fire and Rescue <p>5. For ease, the identifying references obtained from works plan MOR001-FLO-CON-ENV-PLN-0031-MRCNS-J3303-JVW-10012 noted below are as follows:</p> <ul style="list-style-type: none"> • 18A/B Morgan/Morecambe construction compounds • 19A/B – Morgan/Morecambe construction access works • 28A/B – Morgan/Morecambe 400kv connection to National Grid and River Ribble crossing works between Mean High-Water Spring on northern and southern riverbanks • 29A/B – Morgan/Morecambe 400kv connection to National Grid and River Ribble crossing works at southern riverbank • 30A/B – Morgan/Morecambe 400kv connection to National Grid and River Ribble crossing southern compound area • 31A/B – Morgan/Morecambe 400kv connection to national Grid and River Ribble crossing southern compound area • 32A/B – Morgan/Morecambe 400kv connection and connection work to National Grid • 34A/B – Morgan/Morecambe permanent access • 37A/B – Morgan/Morecambe 400kv connection and connection works to National Grid • 38A/B – Morgan/Morecambe National Grid substation connection works 	

Reference	Written Representation Comment	Applicants' response
	<ul style="list-style-type: none"> 48A/B – Morgan/Morecambe 400kv connection to National Grid temporary area 49A/B – Morgan/Morecambe permanent environmental mitigation works 	
REP1-097 1.2	<p>6. Heritage</p> <p>7. Having considered Offshore Historic and Scheduled Monuments Site Plan (sheets 17 and 18) Ref BP-GBR-MORG-REG-0183-01, the Council feels that in the main the proposal is unlikely to impact negatively on, or result in significant harm to, the heritage assets shown or their setting. Notwithstanding concerns raised in relevant reps that archaeology has not yet been fully explored but would lie within the remit of Lancashire County Council Archaeology Department to whom the Council defers, the following heritage assets may be affected, and care is requested during construction.</p> <ul style="list-style-type: none"> Hesketh Farm (Grade II – grid ref (e) 349908 / (n) 428004) – Hesketh Farm lies immediately west of the National Grid substation with 34A/B permanent access proposed adjacent, and 19A/B construction access facing. Howick Hall Site (HER Ref PRN1453-MLA145) – 34A/B permanent route passes adjacent HER to east of Millbrook/north of Liverpool Road (no HER ref available) – 18A/B compound and 19A/B access adjacent Parish Boundary Stone (HER PRN6665-MLA666) – no recorded evidence of above ground stone but 18A/B compounds may affect if stone is still in situ 	<p>The Applicants welcome the acknowledgement from South Ribble Borough Council that in the main the proposal is unlikely to impact negatively on, or result in significant harm to, the heritage assets. The Applicants are aware of the locations of all heritage assets recorded on the Lancashire Historic Environment Record (HER) and on the National Heritage List for England (NHLE). A programme of further archaeological work to be undertaken prior to construction is set out in the Outline Onshore and Intertidal Written Scheme of Investigation (APP-214), which is secured through Requirement 11 within Schedules 2A and 2B of the Draft Development Consent Order (C1/F04).</p> <p>The Applicants have made a commitment (CoT84 of Volume 1, Annex 5.3: Commitments Register of the ES (F1.5.3/F03)) to develop Detailed CoCP(s) in line with the Outline CoCP (APP-193). This includes the use of best practice measures to minimise the effects of construction of the Transmission Assets on the settings of existing heritage assets. This is secured by Requirement 8 within Schedules 2A & 2B of the draft Development Consent Order (C1/F04). Detailed CoCP(s) will be implemented by the Applicants as approved by relevant local authorities in consultation with stakeholders, as appropriate.</p>
REP1-097 1.3	<p>8. Ecological Matters</p> <p>9. The Councils Ecologist (GMEU) has considered information submitted to the Examination up to the 25th April 2025. GMEU welcomes further information provided by the applicants, and detailed responses to ecological issues raised by others, which have satisfied</p>	<p>As shown in Volume 3, Annex 6.2: Agricultural land classification survey results (APP-106), the soil auger boring surveys have identified limited areas of peat within the Onshore Infrastructure Area. In addition, the soil survey work also found that peat resources identified in the Soil Survey of England and Wales mapping (see Table 6.5 of Volume 3, Annex 6.2: Agricultural land classification survey results (APP-106)) have been subject to significant</p>


Reference	Written Representation Comment	Applicants' response
	<p>many of the questions which the Council and GMEU had on ecology issues. Nevertheless, some issues relating to ecology remain to be addressed.</p> <p>10. <i>Impact on Peat</i> - further information is required in relation to the management and restoration of peat during the construction process. In addition to acting as a significant carbon store, peat can support important habitats, and, in some cases, restorable peat could be considered to be an irreplaceable habitat because of its integral role in supporting important rare habitats. Currently the level of information provided does not provide sufficient reassurances that impacts on peat can be adequately avoided, mitigated or compensated. A more comprehensive Peat Management Plan should be required to be developed.</p>	<p>wastage over the 60 year period since the original mapping was undertaken in the late 1960s, as intensive agricultural management of these soils has continued. Section 1.7.6 of the Outline Soil Management Plan (APP-200) includes several commitments to manage potential impacts of the Transmission Assets on peat within the Onshore Order Limits, where these cannot remain in situ during the construction phase. These could include, where required:</p> <ul style="list-style-type: none"> <input type="checkbox"/> additional peat probing surveys to determine the extent and depth of peat to be affected; <input type="checkbox"/> additional measures to ensure the effective handling, storage and reinstatement of peat during the construction phase; <input type="checkbox"/> the preparation of appropriate Peat Management Plans PMP(s) as part of the detailed SMP(s) which will be submitted for approval by the relevant local authorities prior to the commencement of construction, as secured under Requirement 8 of Schedules 2A & 2B of the draft DCO (C1/F04) <p>In addition to the ALC and soil surveys reported in Volume 3, Annex 6.2: Agricultural land classification survey results (APP-106), peat resources were also considered in Volume 3, Chapter 1: Geology, hydrogeology and ground conditions (APP-068), Volume 3, Chapter 3: Onshore ecology and nature conservation (APP-075) and Volume 3, Chapter 5: Historic environment (APP-096). Taking the above information into account, it is considered that sufficient information has been provided with respect to peat resources within the study area to determine the likely significant effects of the Transmission Assets and inform mitigation requirements reported in Volume 3, Chapter 6: Land use and recreation (APP-104) and the J1.7 Outline Soil Management Plan (APP-200).</p>
REP1-097 1.4	<p>11. <i>Impact on Ribble and Alt Estuaries Designated Sites – Birds</i> - further proposals are required to ensure that impacts on notable bird species associated with the Ribble and Alt Estuaries designated sites where landfall occurs within and close to the intertidal zone can be avoided and/or successfully mitigated. GMEU suggest that mitigation could take the form of (further) restrictions on times of working and</p>	<p>The Applicants have made a commitment (CoT129 of Volume 1, Annex 5.3: Commitments Register (AS-030) that no construction activities at landfall on Lytham St Annes beach will be undertaken between November and March (inclusive). This is to mitigate disturbance to roosting wader features of Ribble and Alt Estuary SPA and Ramsar site. This is detailed within the Outline Ecological Management Plan (J6/F02).</p>

Reference	Written Representation Comment	Applicants' response
	the extent of working areas. Relevant representation made in January also refers to the Councils concern that excessive working hours would impact upon residential and local amenity without due reference to measures to secure some form of control	<p>In addition to the seasonal restriction the Applicants are providing mitigation measures at Fairhaven Saltmarsh to reduce disturbance upon roosting wader features of Ribble and Alt Estuary SPA. The Applicants have made a commitment (CoT113) (Volume 1, Annex 5.3: Commitments Register (F 1.5.3/F03) to prepare detailed Ecological Management Plan EMP(s) in accordance with the Outline Ecological Management Plan (OEMP) (J6/F02). This is secured by Requirement 12 within Schedules 2A and 2B of the draft DCO (C1/F04). Detailed EMP(s) will be implemented by the Applicants as approved by the relevant planning authority in consultation with Natural England.</p> <p>The Applicants would also refer South Ribble to the Applicants' response to Hearing Action Points submitted at Deadline 1 – ISH1_30 (REP1-037) which provides justification on the proposed construction working hours.</p>
REP1-097 1.5	<p>12. <i>Outline Ecological Management Plan and Biodiversity Benefit Statement</i> – GMEU welcome the provision of these documents, but note that they are submitted in Outline, with further details to follow if the scheme is permitted.</p> <p>13. The Biodiversity Benefit Statement refers to habitat creation and enhancement as 'indicative' rather than confirmed. GMEU would prefer it if more details were to be provided on these issues during the Examination, to provide the necessary level of reassurance that ecological impacts will be able to be mitigated and/or compensated, and ecological enhancement achieved, before any permission is granted to the proposals. Details should include land ownership and management information, and bodies responsible for future management and monitoring of ecological mitigation and enhancement areas.</p> <p>14. In particular, GMEU would welcome further reassurance that impacts on sand dune systems and saltmarsh will be able to be successfully mitigated, including details of how any areas of saltmarsh and sand dune vegetation are to be restored if they are lost or damaged. Whilst acknowledging that the statutory requirement to</p>	<p>Ecological mitigation</p> <p>The Applicants have made a commitment (CoT 76 of Volume 1, Annex 5.3: Commitments Register (F 1.5.3/F03, latest version of the Commitments Register submitted at Deadline 2) to produce detailed Ecological Management Plan(s) (EMP) in accordance with the Outline Ecological Management Plan (OEMP) (J6/F02, latest version of the OEMP submitted at Deadline 2). The Outline Ecological Management Plan (J6/F02) has been prepared and submitted as part of the application for development consent and includes but is not limited to pre-construction, construction and post-construction mitigation measures relating to habitats and protected or notable species, species mitigation licences and the role of the Ecological Clerk of Works (ECOW) where relevant. This is secured by Requirement 12 within Schedules 2A and 2B of the draft DCO (C1/F04). Detailed EMP(s) will be implemented by the Applicants as approved by the relevant planning authority in consultation with Natural England.</p> <p>The Applicants' note the comments raised by South Ribble in regard to further detail required and will pro-actively engage with them on this. However,</p>

Reference	Written Representation Comment	Applicants' response
	<p>provide at least a 10% gain in biodiversity may not apply to the project, nevertheless the scheme should aim to deliver a meaningful improvement to biodiversity. To this end there should be further consideration of the need for habitat creation and enhancement efforts to contribute to the creation of coherent nature recovery networks in Lancashire.</p>	<p>details on the monitoring of the Environmental Mitigation areas can be found in Section 1.9 of the Outline Ecological Management Plan (J6/F02)</p> <p>Biodiversity benefits</p> <p>As set out in the Onshore Biodiversity Benefit Statement (J11/F03, latest version of the Onshore Biodiversity Benefit Statement submitted at Deadline 2), the Applicants are proposing to make a voluntary commitment to achieve an overall biodiversity benefit for areas of permanent habitat loss associated with the permanent above-ground infrastructure of the Transmission Assets in accordance with National Policy Statements (NPS) EN-1 and EN-5. Whilst these biodiversity benefit measures are not legally required and are not required in order to mitigate any environmental impacts identified through the EIA, the Applicants are committed to delivering those measures where they are able to acquire the land and rights to do so. The Applicants have put careful consideration into the biodiversity benefit measures put forwards in accordance with NPS EN-1 paragraph 4.6.6 (which encourages Energy NSIP proposals to seek opportunities to provide net gains for biodiversity where possible) and considers its proposals are reasonable and proportionate. The final habitat creation and enhancement proposals will be based on detailed landscaping designs for the onshore substations and biodiversity benefit area at Lea Marsh Fields – hence they are indicative at this stage. The Onshore Biodiversity Benefit Statement has been updated at Deadline 2 with further details on Lea Marsh Fields (J11/F03)</p> <p>Impacts on saltmarsh and sand dunes</p> <p>There would be no significant effects to saltmarsh and sand dune habitats as a result of the construction of the project, and therefore no specific mitigation for impacts to these habitats is proposed other than the inherent mitigation provided by the trenchless drilling technique that will be used under the sand dune habitats at landfall. Section 1.6.4 of the Outline Ecological Management Plan (J6/F02) provides detail on the mitigation measures proposed with respect to the protection of the sand lizard population in the Lytham St Anne's dunes. This is secured by Requirement 12 within Schedules 2A and 2B of the draft DCO (C1/F04). Detailed EMP(s) will be implemented by the Applicants</p>

Reference	Written Representation Comment	Applicants' response
		as approved by the relevant planning authority in consultation with Natural England.
REP1-097 1.6	15. <i>Cumulative Impacts</i> - GMEU are not convinced that the cumulative impacts of the proposals in relation to recent and planned development pressures along the route of the transmission assets have been comprehensively assessed. In particular, areas already identified for mitigating and compensating the ecological impacts of current and future developments around Lytham Moss, Lytham Foreshore Dunes and Saltmarsh and the St Annes old Links Golf Course Biological Heritage Sites need to be fully considered (Fylde Borough)	<p>An assessment of cumulative effects for onshore ecology and nature conservation has been included in Section 3.13 of Volume 3, Chapter 3: Onshore ecology and nature conservation (APP-075). As part of this Lytham St Annes Dunes SSSI, Lytham St Annes LNR and Lytham Foreshore Dunes and Saltmarsh and the St Annes Old Links Golf Course Biological Heritage Sites were considered with no significant effects arising.</p> <p>An update to the CEA longlists has been undertaken and included in Volume 1, Annex 5.5: Cumulative effects screening matrix and location plan (REP1-020) to take account of applications submitted since submission of the Transmission Assets and where status' have changed. An update to the assessment of cumulative effects has been submitted (S_D2_10) which concludes there is no potential for new cumulative effects to arise or an increase in cumulative effects for each of the topics considered and the conclusions of the Transmission Assets CEA and in-combination assessments therefore remain unchanged.</p>
REP1-097 1.7	16.Public Rights of Way 17. It is noted on plan BP-GBR-MORG-REG-0180: sheet 17 that the Ribble way (MC13B) and public right of way (MG13/A), and on sheet 18 that public rights of way MCMC11A/B and 14A/B would be temporarily restricted or closed. Relevant representation (Jan 25) raised concern as to the use of the term 'temporary' and whether development would be concurrent or progress over a lengthier time period. A more detailed idea of what 'temporary' in this case would be welcomed, so as to enable the Council to manage resident expectations.	<p>The Applicants will manage and maintain access to the existing Public Rights of Way (PRoW) network during construction (CoT91 of Volume 1, Annex 5.3: Commitments Register of the ES (As-030))). No PRoW will be permanently stopped up as a result of the construction, operation and maintenance or decommissioning of the Transmission Assets. To manage the potential impacts of construction, the Applicants will apply the measures described in the Outline PRoW Plan (AS-048). Table 1.2 provides detail on the proposed mitigation measures which sets out that trenchless techniques are proposed at the Ribble Way location and therefore no management measures are required. At locations 13A-13B (7-9-FP 5) and 14A-14B (7-9-FP-7) managed crossings are proposed and outline measures for the controls of these crossings are included in Section 1.5 of the Outline PRoW Plan (AS-048).</p>

Reference	Written Representation Comment	Applicants' response
		<p>For the majority of the PRow intersected by the Onshore Order Limits, it is proposed that these will remain open with appropriate signage (i.e. managed crossings) to warn of the presence of construction vehicles, and to warn of the presence of walkers, cyclists and horse riders. These managed crossings of PRow will be fenced off with gated crossing points and temporary site fencing to prevent the public from accessing the PRow, when access would need to be managed. Where there is a specific requirement to maintain the access, a suitable route will be clearly marked out to aid safe passage.</p> <p>Where such crossings are installed, a gap will be left in the topsoil bunds after the topsoil has been stripped within the onshore export cable corridors. The measures to be implemented as part of the PRow Management Strategy seek to minimise impacts on public footpaths, bridleways and other promoted routes (e.g. National Cycle Routes (NCRs), Long Distance Footpaths) during construction of the Transmission Assets. The detailed Public Rights of Way Management Plan(s), which will be developed in accordance with the outline Public Rights of Way Management Plan (AS-048), and which forms part of the detailed Code of Construction Practice(s). The detailed CoCP(s) are secured by Requirement 8 of Schedules 2A and 2B of the draft DCO (C1/F04). Detailed Public Right of Way Plan(s) will be implemented as approved by the relevant local planning authority.</p>
REP1-097 1.8	<p>18. Other Matters</p> <p>19. Crown Land – It is noted that land identified on plan DM_22003214_CLP_1. Sheets 8 and 9 are in the ownership of the King's Most Excellent Majesty In Right Of His Duchy Of Lancaster, and the Ministry of Housing, Communities and Local Government. MHCLG Parcel 18.005 however also forms part of planning permission 07/2024/00013/VAR issued by this Council which has been implemented for development of a 49.99 MW Battery Storage Facility, with associated infrastructure and landscaping. The western section of this site which has been developed, is shown on drawing MOR001-FLO-CON-ENV-PLN-0031-MRCNS-J3303-JVW-10012 as being proposed for 19A/19B, and may no longer be an available route</p>	<p>The Applicants note the response and the recent development of the 49.99MW Battery storage facility which interacts with plot 18-005 (REP1-004). The Applicants are in on-going discussions with the landowner regarding the proposed access in this location and the ability for the projects to co-exist so the access route can be used.</p> <p>In addition, the Applicants highlight that Article 47 of the draft DCO submitted at Deadline 2 (C1/F04) has been updated to clarify that any other development, or part thereof, which benefits from an existing planning permission and overlaps with the Order Limits, will be able to proceed. This amendment ensures that the DCO does not prevent the implementation of separately consented developments within the same geographical area.</p>

Reference	Written Representation Comment	Applicants' response
	<p>for construction access. An extract from the approved site plan is provided below.</p> <p>This planning permission may also be relevant to the applicants Report on Interrelationships with Other Infrastructure Projects submission.</p>  <p>Figure 1 Approved site layout - ref 07/2024/00013/VAR:</p>	
REP1-097 1.9	<p>20. Site Compounds – Whilst ecological protection has been addressed above, and would also sit partially within the remit of the Environment Agency, the Council is concerned that compounds noted as 18A/B on sheet 18 are within very close proximity to Mill Brook and a smaller watercourse running in an east to west direction to the south of the proposed compound. Please include details of watercourse protection as part of your final documentation.</p>	<p>Mill Brook is classified as an Environment Agency Main River. The smaller watercourse referenced is classified as an ordinary watercourse. The Outline Surface and Groundwater Management Plan (APP-202) which forms part of the Outline CoCP includes measures to:</p> <ul style="list-style-type: none"> <input type="checkbox"/> minimise the level of contaminants being generated; <input type="checkbox"/> prevent contaminated water moving to a surface or groundwater body; and, <input type="checkbox"/> maintain silt control and drainage measures to ensure they remain effective

Reference	Written Representation Comment	Applicants' response
		Detailed Surface Water and Groundwater Management Plan(s) will be implemented by the Applicants as approved by the relevant planning authorities in consultation with the Environment Agency which will include details of all watercourse protections. This is secured via Requirement 8 of Schedules 2A and 2B of the draft DCO (C1/F04).
REP1-097 1.10	<p>21. Construction Management – As noted above and in relevant representation from Jan 25, the Council has real concerns as to the extended hours of construction; particularly in areas such as the proposed construction access works marked 19A/B on sheet 18 running between Pollards Farm, and the approved development identified by section 19 (above), and the site compounds to the south of the National Grid facility marked 18A/B to the rear of residential properties on Howick Cross Lane</p> <p>22. Please note references to 34A/B identified on the southern section of sheet 17 are not shown on sheet 18.</p>	<p>The Applicants would also refer South Ribble to the Applicants' response to Hearing Action Points submitted at Deadline 1 – ISH1_30 (REP1-037) which provides justification on the proposed construction working hours.</p> <p>The Applicants can also confirm that the references are present on Sheet 18 of the Works Plans (AS-015) however, the labels are positioned slightly differently to increase the readability of the plan.</p>
REP1-097 1.11	23. River Ribble Crossing – Plans provided do not appear to clearly show how works to cross the River Ribble will be conducted. This lack of information is concerning, and the Council would ask that more information is provided in a readily accessible format.	The Applicants would refer South Ribble Borough Council to Section 3.15.8 of Volume 1, Chapter 3: Project Description (F1.3/F03) which provides details on the trenchless techniques proposed for the River Ribble crossing.
REP1-097 1.12	<p>24. As stated in relevant representation, the Council is very conscious that the National Planning Policy Guidance relating to Nationally Significant Infrastructure Projects states that the Planning Act provides for a process which requires 'a front-loaded approach where the developer consults on a proposed application before submitting that application to the Planning Inspectorate (acting on behalf of the Secretary of State'. There are a number of areas where this has not been the case, and whilst the submission is considerable in its approach, there are areas of the process where assumptions have been made, and documentation is less than complete.</p> <p>This representation is submitted for, and on behalf of South Ribble Borough Council.</p>	The Applicants note the comments made by South Ribble Borough Council and will continue to pro-actively engage with them.

Reference	Written Representation Comment	Applicants' response
	Should you have any comments or questions please do not hesitate to contact us	

2.16 SP Energy Networks

Table 2.13: REP1-098 –SP Energy Networks

Reference	Written Representation Comment	Applicants' response
REP1-098 098.1	Thank you for the opportunity to comment on the above DCO application. The following written representations are made further to the comments submitted by SP Energy Networks, on behalf of SP Manweb the electricity distribution licence holder, in its representation dated 20th February 2025 (Ref AS-062)	The Applicants thank SP Energy Networks (SPEN) for its written representation (REP1-098) and for their continued engagement.
REP1-098 098.2	Further to SPENs representations, which referred to working with the applicant regarding suitable protective provisions, SPEN has been engaging with the applicant regarding a revised set of protective provisions for SP Manweb. SPEN is now in receipt of a draft copy of PPs for SPM and these are generally acceptable. SPEN sees the next step being for these PPs to be published in the Examination documents before reviewing its position to confirm this. SPEN has noted the Deadline 3 due date of 7th July when it can further respond.	<p>The Applicants confirm that they have been engaging with SPEN to develop bespoke protective provisions for SP Manweb, which reflect the interactions between the Transmission Assets and SP Manweb's network. As set out in the Lands Right Tracker (REP1-065), the Applicants provided a set of protective provisions for the protection of SP Manweb to SPEN on 6 May 2025 and these draft protective provisions were included as a new Part 11 to Schedule 10 of the draft Development Consent Order (DCO) submitted at Deadline 1 (REP1-008).</p> <p>The Applicants will continue to engage with SPEN and SP Manweb to seek to finalise the protective provisions for SP Manweb, included in Schedule 10 of the draft DCO (C1/F04) with a view to addressing SPEN's concerns and facilitating the withdrawal of its objection. The Applicants note that SPEN will respond further at Deadline 3, and the Applicants will continue to engage with SPEN ahead of Deadline 3 with a view to reaching agreement on the protective provisions.</p>
REP1-098 098.3	SPEN will continue to reserve the right to add to the above in the event there are any changes to the proposed development and draft DCO, as well as any other aspects of the proposed development	The Applicants acknowledge SP Manweb's land interests and confirm that engagement is ongoing with SPEN and SP Manweb to ensure that their concerns are appropriately addressed through the protective provisions.
REP1-098 098.4	SPEN may also see it necessary to submit further representations regarding SP Manweb's land interests under its Affected Persons status (Reference MMTA-AP032).	The Applicants note this response.

2.17 BAE Systems

Table 2.14: REP1-111–BAE Systems

Reference	Written Representation Comment	Applicants' response
REP1-111 111.1	Morgan and Morecambe Offshore Wind Farms: Transmission Assets [Ref. EN020028] - Deadline 1: Response to the Action Points of the ExA arising from Issue Specific Hearing 1 (Our client: BAE Systems [Unique Reference: 20053944])	The Applicants acknowledge BAE's response to the ExA's Hearing Action Points.
REP1-111 111.2	<p>Dear Sir/Madam,</p> <p>As you will be aware, we are instructed to act on behalf of BAE Systems in connection with the application for development consent made in respect of the Morgan and Morecambe Offshore Wind Farms: Transmission Assets.</p> <p>We write in order to respond to the Examining Authority's ("ExA") action points arising from Issue Specific Hearing 1 – in particular, Action Point 41 (which was directed to our client to provide a response): Provide an update on any progress with the various matters listed in their closing submission to this Examination which were outstanding as at 10 March 2025 of the connected Morgan Offshore Wind project.</p> <p>BAE Systems' closing statement and final submissions to the ExA for the Morgan Offshore Wind Project: Generation Assets [Ref. EN010136] are contained in the following application documents: ref. REP6-096 and ref. REP7-018.</p> <p>The Applicant sought to address the matters raised by our client in its response to the ExA's Rule 17 letter (application document ref. REP7-004) (copy attached) – see section 4.1 headed "Aviation and Radar" and</p>	<p><u>In respect of the Morgan Offshore Wind Project: Generation Assets:</u></p> <p>Morgan OWL notes BAE's summary of its position at the close of the Morgan Generation examination and the additional information that has been provided at BAE's request. As noted in the response, that information is still being considered by BAE. Morgan OWL is actively seeking engagement to understand when BAE will complete its review in order to resolve any outstanding issues and is waiting for BAE to respond to requests for meetings to discuss these matters. In terms of the activity list referred to by BAE, Activity 2 (delivery of the IFP assessments for Walney Aerodrome (by NATS, the Approved Procedure Design Organisation (APDO) for Walney Aerodrome) was completed and issued to BAE on 21 May 2025. Against Activity 4, (delivery of the IFP assessments for Warton Aerodromes (by Sagentia Aviation, the APDO for Warton Aerodrome), Morgan OWL understand that Sagentia is still waiting for technical information from BAE to complete its assessment). Although these are matters for the Morgan Generation examination, Morgan OWL highlights that the Examining Authority's report for the Morgan Generation project has now been provided to the SoS and any relevant updates on BAE's position will be publicly available at Morgan Offshore Wind Project Generation Assets - Project information.</p> <p><u>In respect of the Morecambe Offshore Windfarm: Generation Assets:</u></p> <p>Morecambe OWL note BAE's summary of its position at the close of the Morecambe Generation examination. Morecambe OWL has had correspondence with BAE in respect of both Walney and Warton Aerodromes since the close of</p>

Reference	Written Representation Comment	Applicants' response
	<p>Appendix A containing Table A.1: "Key tasks and high-level programme for finalisation of aviation and radar matters (AR 3.1)".</p> <p>Table A.1 identifies 15 activities, grouped under 4 broad headings, as follows:</p> <ol style="list-style-type: none"> 1. IFP / MSA [Instrument Flight Procedure / Minimum Sector Altitude]: Activities 1 to 7 2. VHF / UHF / DF communications [Very High Frequency / Ultra High Frequency / Direction Finding]: Activities 8 to 10 3. DCO Requirement – inclusion of OSPs [Offshore Substation Platforms]: Activities 11 to 13 4. PSR [Primary Surveillance Radar]: Activities 14 and 15 <p>At the present time, none of the above-mentioned matters can be completely closed out. The up to date position with regard to the activities referred to in Table A.1 is as follows:</p> <ul style="list-style-type: none"> • Activity 1 – negotiations in respect of a commercial agreement for the implementation of mitigation have not yet commenced. The Applicant and BAE Systems are discussing the terms of the non-disclosure agreement which is required to be put in place before negotiations in respect of the aforementioned commercial agreement can begin in earnest. Further, it should be noted that a commercial agreement is required to be put in place for all mitigation, not only that which is relevant to the IFPs and MSAs at Walney and Warton Aerodromes. This is the case for both the Morgan and the Morecambe (see below) Offshore Wind Farm projects. • Activities 2 and 4 – delivery of the IFP assessments for Walney (by NATS) and Warton Aerodromes (by 	<p>examination, and there are further meetings scheduled with BAE in the coming weeks in respect of Walney Aerodrome although BAE has, to date, not responded to requests for a meeting in respect of Warton Aerodrome.</p> <p>Morecambe OWL considers that the DCO submitted at the close of the Morecambe Generation examination contains robust and unambiguous drafting which secures mechanisms for both of BAE's points (i) and (ii) to be agreed, implemented and maintained, as required, for the life of the authorised development before any above-sea infrastructure can be constructed. It would not be standard for a full mitigation solution in respect of radio communications to be agreed and documented at this stage of the Morecambe Generation application, particularly as the operational impacts are still being further considered by BAE. Similarly, BAE is continuing to undertake a more detailed operational assessment of the proposed radar mitigation measures (which BAE originally expected to complete mid-way through the Morecambe Generation examination), although it confirmed that the proposed mitigation was technically viable. There are suitable requirements which would deliver the necessary mitigation once operational assessments are complete.</p> <p>Morecambe OWL considers that these are matters for the Morecambe Generation examination.</p>

Reference	Written Representation Comment	Applicants' response
	<p>Sagentia Aviation; formerly Osprey) remains outstanding; a fixed date/timeline for delivery has not been confirmed.</p> <ul style="list-style-type: none"> • Activities 8 and 9 – Technical Safeguarding Assessments (in respect of “CNS” equipment – communication, navigation and surveillance) for Walney and Warton Aerodromes (prepared by NATS) were delivered to BAE Systems on 8 May 2025 and are in the process of being considered. BAE Systems will look to engage with the Applicant in respect of the assessment findings once their review has been concluded. • Activities 11 and 12 – Line of Sight Assessments (in respect of OSPs) for Walney and Warton Aerodromes (prepared by Sagentia Aviation) were delivered to BAE Systems on 8 May 2025 and are in the process of being considered. BAE Systems will look to engage with the Applicant in respect of the assessment findings once their review has been concluded. Pending agreement over this matter being reached, the draft Requirement wording in respect of air traffic services at Walney and Warton Aerodromes cannot be settled as between the Applicant and BAE Systems and must remain in discussion. • Activity 14 – the Applicant's proposed mitigation solution in respect of the PSR at Warton Aerodrome has been technically assessed by BAE Systems (Operations) Ltd (“BAE Ops”). It is currently undergoing operational assessment in order to ascertain its acceptability. Once BAE Ops is satisfied that implementation of the proposed mitigation solution will prevent or remove any adverse impacts arising from the authorised development upon the operation of the PSR and the PSR air traffic control operations, it will advise the Defence Infrastructure Organisation (“DIO”) and DIO 	

Reference	Written Representation Comment	Applicants' response
	<p>will take the necessary steps to remove the MOD's objection to the DCO application.</p> <ul style="list-style-type: none"> • Activity 15 – the MOD's objection to the DCO application on the basis of the authorised development's adverse impact on the PSR at Warton Aerodrome is still in place, and draft Requirement wording to secure the implementation of an approved radar mitigation scheme is still to be agreed. <p>For completeness, we also wanted to confirm the latest position in respect of the aviation related items which remained in discussion between the Applicant and BAE Systems at the completion of the examination in respect of the Morecambe Offshore Windfarm: Generation Assets [Ref. EN010121].</p> <p>Summary details of the above-mentioned items are provided in our client's closing submissions to the ExA – see application document ref. REP6-069 (which appended application document ref. REP5-056).</p> <p>Following the close of the examination, there has been no further engagement between the Applicant and BAE Systems – consequently:</p> <p>(i) an agreement in respect of the impacts arising from the authorised development (alone and cumulatively when considered alongside other schemes) on radio (VHF, DF and UHF) communications to aircraft operating from Walney and Warton Aerodromes, and a suitable mitigation solution to address those impacts, remains outstanding; and</p> <p>(ii) the MOD's objection to the DCO application on the basis of the authorised development's adverse impact on the operation of the PSR and PSR air traffic control operations at Warton Aerodrome is still in place, and draft Requirement wording to secure the implementation</p>	

Reference	Written Representation Comment	Applicants' response
	<p>of an approved radar mitigation scheme is still to be agreed.</p> <p>Should the ExA have any queries or require additional clarification in respect of the matters discussed in this email, they should not hesitate to let us know.</p>	

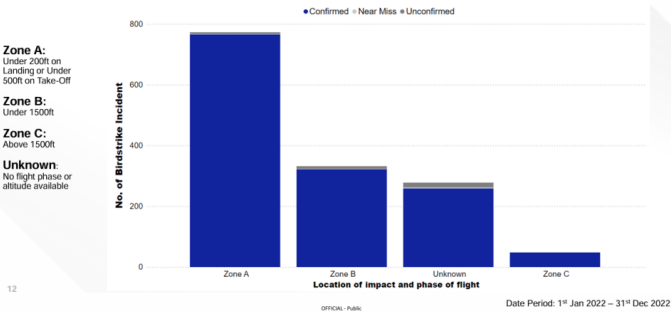
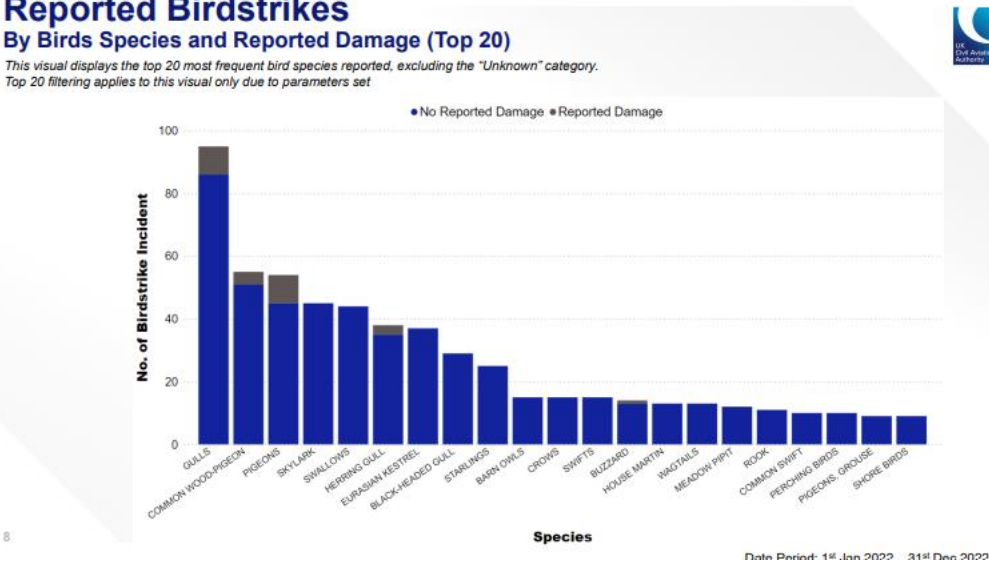
Table 2.15: REP1-112–BAE Systems

Reference	Written Representation Comment	Applicants' response
REP1-112 112.1	<p>1.0 INTRODUCTION</p> <p>1.1 This Statement sets out BAE Systems' written representations at Deadline 1. It provides comments on the Applicants' Response to BAE Systems' Relevant Representations (Examination Library Document: PDA-008) and builds on the oral submissions made by BAE Systems during the Preliminary Meeting and Issue Specific Hearing 1 (ISH1) which took place on 29 April 2025 and 30 April / 1 April 2025 respectively. The matters upon which this Statement will focus are as follows:</p> <ul style="list-style-type: none"> • The need for, and scope of, a Bird Strike Risk Assessment; • Site selection process for the Applicants' Ecological Mitigation Sites and Biodiversity Benefit Areas • Other Aviation Related Safeguarding Assessments • Solar Farm at Barrows Lane, Warton 	<p>The Applicants acknowledge BAE Systems' position and welcome the ongoing engagement through the Statement of Common Ground process and associated technical meetings that have taken place since Deadline 1.</p>

Reference	Written Representation Comment	Applicants' response
REP1-112 112.2	<p>2.0 THE NEED FOR, AND SCOPE OF, A BIRD STRIKE RISK ASSESSMENT</p> <p>2.1 BAE Systems' Relevant Representations (RR-208) set out the need for and importance of a Bird Strike Risk Assessment in order to understand the risk posed by bird strike to aircraft operating out of Warton Aerodrome and whether this risk could be increased or altered as a result of the proposed development, subject of the Applicants' DCO application. This remains BAE Systems' starting position. Absent a thorough assessment and a proper understanding of the nature and level of risk involved, we fail to see how a suitable, robust and effective mitigation strategy can be devised.</p>	<p>The Applicants do not consider that the Project will increase or alter the risk posed by bird strike to aircraft operating out of Warton Aerodrome or that the Project will create an increased risk to public safety.</p> <p>The Applicants met with BAE on 19 May and have committed to working with them to provide information to resolve their concerns. Further technical meetings are planned to discuss the Strategy for Wildlife Hazard Management Plan (S_D2_14 submitted at Deadline 2).</p> <p>It is the Applicants' position that the existing Bird Strike Risk Assessment that is currently in place at the Aerodrome (as per the requirements of CAP 772 Wildlife hazard management at aerodromes) would be updated to ensure that, in the unlikely event there would be any changes in bird strike risk as a consequence of the Transmission Assets mitigation, the existing technical mitigation solutions remain appropriate. This would ensure that BAE remain in control of the Bird Strike Risk Assessment, but the Applicants would be required to provide relevant information to inform this through (i) an agreed approach to monitoring and (ii) evidence on the likely additional attraction, if any, of birds to the wildlife zone. The principles of this approach have been verbally agreed with Blackpool Airport as a robust approach and will be further discussed at the next technical meeting with BAE.</p> <p>The update and implementation of any such additional work would be at the cost of the Applicants.</p>
REP1-112 112.3	<p>Factors to be Considered in a Bird Strike Risk Assessment</p> <p>2.2 In their response to BAE Systems' Relevant Representations (PDA-008) (which was repeated during ISH1), the Applicants have stated that, in their view, they can provide mitigation for the existing bird population without consequently increasing the safety risk to BAE Systems. At page 7 of PDA-008, the Applicants reference their intention only to provide mitigation habitat for those birds which are already present in the area, that may otherwise be displaced during construction works for the</p>	<p>Whilst it is the Applicants' view that the small scale mitigation measures, and Biodiversity Benefit Areas proposed, will have no perceivable change to the highly populated, and fluctuating bird populations in the area, the Applicants acknowledge that there is merit in discussing this further with BAE. The Applicants met with BAE on 19 May and have committed to working with them to provide information to help deal with their concerns associated with the location of the mitigation areas and potential increase in birds within the flight paths and thus increasing risk of bird strikes. A further technical meeting is currently being arranged.</p> <p>The Applicants have also committed to updating the outline Ecological Management Plan (APP-212) to provide further detail on the design and habitat mitigation measures that are proposed for each of the environmental mitigation and biodiversity</p>

Reference	Written Representation Comment	Applicants' response
	<p>proposed development and through the loss of habitats at the onshore substation sites.</p> <p>2.3 However, BAE Systems takes little comfort from this statement and has a number of concerns regarding the Applicants' approach.</p> <p>2.4 The Applicants are assuming that the Ecological Mitigation Sites will not increase overall numbers of birds in the area. However, no evidence has been provided to demonstrate that this would be the case and no assessment of the baseline or the future development scenario has been undertaken. The Applicants' view is an extremely simplistic one – this being that bird numbers will not increase because only mitigation for what is being lost is proposed. It is feasible that the Ecological Mitigation sites could attract more birds to the area for reasons such as the habitat to be provided is of better quality (being specifically designed) than the existing habitat, or the Mitigation Sites may be more conveniently located for larger bird populations. However, it would appear as though the Applicants have not considered this.</p> <p>2.5 Additionally, it is not the case that only mitigation for what is being lost by way of habitats is proposed. The Applicants are also proposing to provide areas of habitat creation – termed “Biodiversity Benefit Areas” – at the onshore substation sites and at Lea Marsh Fields. These areas are not proposed as mitigation, rather they are additional habitat proposed to deliver a voluntary biodiversity net gain. Whilst the Biodiversity Benefit Areas may not specifically be designed to attract birds, they could inadvertently do so. During ISH1, BAE Systems provided the example of otter habitat unintentionally attracting birds as a result of the presence of discarded fish carcasses, a food source for otters. At page 11 of</p>	<p>benefit areas. This will include the specific features provided for the displaced target species and will also consider where other species may be attracted and how this will affect wildlife movement patterns in response. Where possible, this will be based on case studies and evidence from other projects. Where appropriate, indicative locations of specific features (e.g. feeding areas and / or scrapes) will be identified. Information will also be provided on the ongoing management measures that will be implemented during the construction and operation (e.g. cutting rotations). The measures will take into account the guidance within CAP 772: Wildlife hazard management at aerodromes (CAA, 2017). The oEMP will also set out the principles of the ongoing monitoring strategy in relation to the delivery of the ecological mitigation (i.e. not with an aviation perspective, but whether the ecological mitigation sites are performing ecologically / ornithologically as intended). This information will be provided to Natural England, BAE Systems and Blackpool Airport. This commitment is explained within the Strategy for Wildlife Hazard Management Plan (S_D2_14) submitted at Deadline 2 and has been sent to BAE and Blackpool Airport</p>

Reference	Written Representation Comment	Applicants' response
	PDA-008, the Applicants state that there are no proposals to increase the number of birds within the area as a result of habitat creation. Whilst this sentiment is acknowledged, BAE Systems has no visibility of the measures which the Applicants are proposing to implement at the Biodiversity Benefit Areas in order to prevent an increase in bird numbers from occurring.	
REP1-112 112.4	<p>2.6 It is not just an overall increase in bird numbers in the area that may worsen the bird strike risk to aircraft operating out of Warton Aerodrome – it is clear from the Applicants' Response to BAE Systems' Relevant Representations (PDA-008) that this is something which they fail to appreciate and consequently have not yet grappled with. The bird strike risk could change and potentially worsen if the proposed development results in birds being brought closer to the Aerodrome, thereby increasing bird concentrations in proximity of the Aerodrome, as well as flight paths and take-off and approach paths, even if overall bird numbers within the wider area don't increase. This underlines the critical need for detailed surveys and assessments to be undertaken in order to identify bird concentrations within the area of Warton Aerodrome and the regular movement patterns of local bird populations (particularly those species considered hazardous) at different times of the year.</p> <p>2.7 Information collated by the Civil Aviation Authority shows that bird strike risk greatly increases at lower altitudes. Over the period from 1 January 2022 to 31 December 2022 (latest data available), of all the reported bird strikes across the UK, we note that the largest number occurred at under 200ft or under 500ft, as shown by the graph below:</p>	<p>The Applicants note the information submitted by BAE and that, following review of the Blackpool Airport bird strike data, bird strike is 'runway critical' with the majority of historic bird strikes being as a result of birds within the airport itself (rather than from concentrations in proximity). The Applicants note that the current wildlife baseline will be set out in BAE's existing Wildlife Hazard Management Plan and its Safety Management System, which the Applicants have requested.</p> <p>The Applicants note that the issue is more complex than simply increasing the numbers of birds in the area, and having reviewed the bird data for the area, the Applicants have noted that Warton Aerodrome is adjacent to some of the highest concentrations of bird activity outside of the Ribble and Alt Estuary, namely Newton Marsh SSSI which supports nationally important numbers of waders and wildfowl during both the breeding and non-breeding seasons. The Applicants note that all of the proposed mitigation areas are further away from the Aerodrome than Newton Marsh SSSI which sits almost at the end of Warton's runway, with the Estuary and saltmarshes (also areas with existing very high densities of birds) adjacent to the south and west of the Aerodrome. As a result, the potential risk would theoretically be reduced rather than increased if the ecological mitigation and biodiversity benefit areas were to act as an attractant (and therefore draw birds further away from the runway) as suggested by BAE.</p> <p>From review of the CAA and Blackpool Airport bird strike data (as Warton Aerodrome have not yet made their data available to the Applicants), it has also become clear that gulls cause the greatest risk to air safety (see CAA national data below), not only are they regularly struck but they are also large enough to cause damage. Approximately 85% of Blackpool Airport's 5 year strikes (the nearest local proxy available to the Applicants) involved gulls (see Blackpool Airport's appendix to their written rep). The reasons behind this are not understood at this time but the</p>

Reference	Written Representation Comment	Applicants' response
	<p>Zone A: Under 200ft on Landing or Under 500ft on Take-Off</p> <p>Zone B: Under 1500ft</p> <p>Zone C: Above 1500ft</p> <p>Unknown: No flight phase or altitude available</p>  <p>(source: Civil Aviation Authority, UK Reported Birdstrikes 2022¹)</p> <p>2.8 Aircraft operating from Warton Aerodrome are at lower altitudes closer to the Aerodrome (for taking-off and landing). The proposed location of some of the Ecological Mitigation Sites and the Biodiversity Benefit Sites, being in close proximity to Warton Aerodrome, introduces the potential for increased concentrations of birds to be present in areas where aircraft is operating at lower altitudes. This is of significant concern to BAE Systems and is a potential adverse impact of the proposed development which simply must be assessed and properly understood.</p>	<p>Applicants are clear that they are not proposing mitigation for gulls and that main attractants for gulls in the area are likely the landfill site or the sewage treatment plant that are closer to Warton Aerodrome than the proposed mitigation areas.</p> <p>Reported Birdstrikes By Birds Species and Reported Damage (Top 20)</p> <p>This visual displays the top 20 most frequent bird species reported, excluding the "Unknown" category. Top 20 filtering applies to this visual only due to parameters set</p>  <p>(source Civil Aviation Authority, 2022)</p> <p>The Applicants are committed to understanding trends and distributions of birds in the area to aid their ongoing discussions with BAE and have committed to providing a technical note that captures the baseline bird numbers and how birds currently use the bird survey area. This commitment is explained within the Strategy for Wildlife Hazard Management Plan (S_D2_14) submitted at Deadline 2 and which has been sent to BAE and Blackpool Airport.</p>

Reference	Written Representation Comment	Applicants' response
REP1-112 112.5	2.9 Changes in the number and / or concentration of specific bird species also needs to be considered. Different types of birds present different levels of risk of bird strike, but also different levels of damage and seriousness of outcome should a bird strike occur.	<p>The Strategy for Wildlife Hazard Management Plan (S_D2_14) submitted at Deadline 2, sets out how the Applicants will ensure any changes in the number and/or concentration of different bird species will be considered as well as the species distribution locally assemblage composition, factoring in that the geese and swans may represent a low risk of strike (based upon the CAA and Blackpool Airport 5 year bird strike data and considering the number of geese in the area) but that a strike by these larger species is likely to cause a greater level of damage to aircraft. All work will be carried out based upon the guidance set out in CAP 772: Wildlife Hazard Management at Aerodromes from the CAA, and the Applicant wishes to work constructively with BAE on this issue.</p> <p>This commitment is explained within the Strategy for Wildlife Hazard Management Plan (S_D2_14) submitted at Deadline 2 and has been sent to BAE and Blackpool Airport.</p>
REP1-112 112.6	<p>Bird Strike Mitigation</p> <p>2.10 During ISH1, the Applicants made oral submissions that they would work with BAE Systems to develop a mitigation and management plan for bird strike risk. Whilst BAE Systems welcomes this, we do not consider it appropriate, nor possible, to develop a robust and effective mitigation strategy until a detailed understanding of how bird strike risk could be altered and potentially worsened by the proposed development and what the specific contributory factors are to that change in risk.</p> <p>2.11 The different contributory factors will necessitate different mitigation solutions. For example, it may be a specific type of habitat or a specific habitat feature that is contributing towards a change and/or increase in risk. The mitigation solution in that instance could be the redesign or removal of the habitat feature (such as a water feature). However, the Applicant's risk assessment could identify that it is the location of a specific Ecological</p>	<p>The Applicants note that reviewing and updating BAE's existing safeguarding systems can only be undertaken by BAE on behalf of Warton Aerodrome due to the sensitive nature of operations at Warton Aerodrome and that this must also take into account the existing Wildlife Hazard Management Plan (which Warton Aerodrome is required to implement as per CAP 772 guidance, and as part of its existing and ongoing Safety Management System to remain in compliance with its CAA licence). Unlike Blackpool Airport, BAE have not yet provided the Applicants with a copy of their existing Wildlife Hazard Management Plan.</p> <p>The Applicants have provided a technical note at Deadline 2 that clarifies the site selection process that was followed to identify the Transmission Assets' environmental mitigation and biodiversity benefit areas – see Environmental Mitigation and Biodiversity Benefit Site Selection Note (S_D2_13). This includes the criteria that was applied to identify these areas (such as proximity of the parcel to the location of the impact; the size of land parcel) and how feedback was considered. Alongside the description of the site selection process, the Applicants have also set out why each ecological mitigation and biodiversity benefit area was selected.</p> <p>The outline of this information was communicated to BAE at a meeting on 19 May. This also explained the Applicants' proposed approach for the Strategy for Wildlife</p>

Reference	Written Representation Comment	Applicants' response
	<p>Mitigation Site or Biodiversity Benefit Area that is driving a change and/or an increase in the baseline risk. In that instance, consideration may need to be given to relocating the site in question or to abandoning it all together. It's not at all clear whether the Applicant's site selection criteria for identification of the Ecological Mitigation Sites and Biodiversity Benefit Areas took account of bird strike risk and the potential for the Applicant's habitat re-provision and creation proposals to give rise to adverse impacts on aviation interests. Further information regarding the Applicants' site selection process the Ecological Mitigation Sites and Biodiversity Benefit Areas (and the criteria against which candidate sites were assessed) has been requested by BAE Systems and is awaited.</p>	<p>Hazard Management Plan (S_D2_14) submitted at Deadline 2 which has been sent to BAE and Blackpool Airport.</p> <p>Within the Strategy for Wildlife Hazard Management Plan (S_D2_14), there are also details explaining that the outline Wildlife Hazard Management Plan will set out a process for reviewing monitoring results and adapting the management measures quickly, where necessary. These adaptive management measures (e.g. changes to ecological mitigation areas layout, maintenance, scaring tactics) will be outlined in a mitigation hierarchy that will form the basis of any response period and the Applicants are confident that the mitigation hierarchy will not require a consideration of alternatives locations for ecological mitigation or biodiversity benefit, as this mitigation hierarchy already applies to Warton Aerodrome's ongoing management of their own Wildlife Hazard Management Plan, as required by their Safety Management System under their CAA licence. This strategy has been sent to BAE (and Blackpool Airport) for discussion and agreement. The Strategy for Wildlife Hazard Management Plan (S_D2_14) has been submitted at Deadline 2 to demonstrate the forward engagement plan with BAE (and Blackpool Airport). This document will support ongoing discussions between the Applicants, Blackpool Airport and BAE with regards to the safeguarding of Blackpool Airport and Warton Aerodrome.</p>
REP1-112 112.7	<p>2.12 It is important that the mitigation strategy which is ultimately implemented by the Applicants comprises both preventative and reactionary/responsive measures.</p> <p>2.13 Preventative measures will be those that seek to ensure that the proposed development does not result in a change to and/or worsening of the bird strike risk. As stated above, this may include designing the habitat areas created in such a way as to avoid or minimise bird attractants. It could also include the use of management and maintenance techniques which make sites unsuitable or less attractive to birds (such as regular mowing). As stated above, subject to the findings of a risk assessment, it may be that the only suitable form of</p>	<p>As noted above, the Applicants do not consider that the Project will increase or alter the risk posed by bird strike to aircraft operating out of Warton Aerodrome or that the Project will create an increased risk to public safety, noting that bird strike is an existing risk which BAE is obliged to monitor and mitigate for under CAP 772 (as set out in more detail in REP1-112 112.2 above). The Applicants have engaged with BAE on a strategy for preparing an outline Wildlife Hazard Management plan for the Transmission Assets. This commitment is explained within the Strategy for Wildlife Hazard Management Plan (S_D2_14) submitted at Deadline 2 and has been sent to BAE and Blackpool Airport.</p> <p>The outline Wildlife Hazard Management Plan will take into account the guidance provided in CAP772 (CAA, 2017) and the measures within the existing wildlife hazard management plans for Blackpool Airport and Warton Aerodrome. This document will remain live for the duration of the mitigation in place and therefore the mitigation will</p>

Reference	Written Representation Comment	Applicants' response
	<p>preventative mitigation is the relocation of the relevant Ecological Mitigation Site and/or Biodiversity Benefit Area or its removal altogether from the project proposals.</p> <p>2.14 Reactionary/responsive measures, which principally comprise adaptive management techniques, will require on-going monitoring– an example includes tactics to scare birds away from certain areas if numbers / concentrations on individual sites are understood to be increasing.</p>	<p>be dynamic based on the risk posed at that time; this will consider both reactionary and responsive measures.</p> <p>The wildlife hazard management plan will explain how the mitigation measures within the oEMP and other construction management plans (e.g. the Code of Construction Practice) will manage the risk of bird strike alongside the measures already in place at both Blackpool Airport and Warton Aerodrome and the strategy to be agreed for monitoring the effectiveness of these measures, including the duration, frequency, vantage points, and reporting procedures for the monitoring.</p> <p>Key to the strategy will be the process for reviewing monitoring results and adapting the management measures quickly, where necessary. These adaptive management measures (e.g. changes to ecological mitigation areas layout, maintenance, scaring tactics) will be outlined in a mitigation hierarchy that will form the basis of any response period. The monitoring strategy will also include a commitment for ongoing monitoring post construction at the permanent mitigation areas.</p>
REP1-112 112.8	<p>2.15 The Applicants accept the fact that mitigation is required – in the form of a “Bird Strike Mitigation Plan” which will be a new appendix to the Outline Ecological Mitigation Plan (Examination Library Document: APP-212). It follows therefore that the risk/adverse impact being mitigated against needs to be assessed and understood. The Ecological Mitigation Sites and Biodiversity Benefit Areas are within the Order Limits of the Applicant's DCO application; they form part of the proposed development for which development consent is being sought. The likely environmental effects of the entirety of the proposed development, their significance and whether they are adverse or beneficial in nature, are required to be assessed. This is critical to the Secretary of State being able to make a sound decision in respect of whether or not to grant the Applicant's DCO application. It is within this context that BAE Systems makes these written representations and repeats its</p>	<p>The Applicants are committed to working with BAE to ensure that BAE's existing safeguarding systems and wildlife management plan (required under CAP 772) can continue to be complied with. The Applicants have engaged with BAE on a strategy for preparing an outline Wildlife Hazard Management Plan for the Transmission Assets. This commitment is explained within the Strategy for Wildlife Hazard Management Plan (S_D2_14) submitted at Deadline 2 and has been sent to BAE and Blackpool Airport.</p> <p>An outline of the proposed steps was discussed with BAE on 19 May, and the Strategy for Wildlife Hazard Management Plan (S_D2_14) was sent to BAE on 29 May. The document outlines the steps that the Applicants are proposing to undertake to work with BAE but the Applicants have received no response from BAE to date.</p> <p>The Applicants are committed to working with BAE to provide information at upcoming deadlines to facilitate BAE's understanding of the nature and level of risk involved. The Applicants strongly believe that management of bird strike risk is achievable, as demonstrated by the ongoing management undertaken by Warton Aerodrome under their existing Wildlife Hazard Management Plan.</p>

Reference	Written Representation Comment	Applicants' response
	<p>request for the Applicants to undertake a Bird Strike Risk Assessment and to submit the results of the Assessment to the Examination.</p> <p>2.16 BAE Systems consider that the scope of the above-mentioned Assessment and Mitigation Plan should be as follows:</p> <p>(i) Aims – an initial section that clarifies the overall aims of the document.</p> <p>(ii) Methodology – details of how changes to bird strike risk have been identified / assessed and how mitigation / prevention options have been considered.</p> <p>(iii) Baseline Analysis – in order to identify how the proposed development may change bird strike risk, it is essential that an assessment of current bird numbers, locations / concentrations and movements for a range of bird species is undertaken. The assessment will need to consider how these factors change over the course of a year as numbers and concentrations of birds are affected annually by factors such as migration and will also need to consider the potential implications of climate change (for example, are bird numbers increasing as migration routes change due to climate change).</p> <p>(iv) Assessment of Effects – details of how the proposed development may alter the baseline scenario. In order to undertake this assessment, greater detail will be required on the proposals for the Ecological Mitigation Sites and Biodiversity Benefit Areas, including the types of habitat proposed, specific habitat features, and management regimes.</p> <p>(v) Consideration of Alternatives – if the Assessment of Effects identifies that risk will change and/or increase, it would first be appropriate to consider if alternative</p>	

Reference	Written Representation Comment	Applicants' response
	<p>proposals would avoid or reduce that risk before moving on to consider mitigation measures.</p> <p>(vi) Mitigation and Monitoring Proposals – identification of both preventative and reactionary/responsive mitigation measures and details of monitoring which will be undertaken to assess if the mitigation measures being implemented are proving effective.</p>	
REP1-112 112.9	<p>3.0 SITE SELECTION PROCESS FOR ECOLOGICAL MITIGATION SITES AND BIODIVERSITY BENEFIT AREAS</p> <p>3.1 It is noted that the Examining Authority's (ExA) questions following ISH1 include a question to the Applicants about the site selection process for the Ecological Mitigation Sites and Biodiversity Benefit Areas. BAE Systems welcomes this question and would like the Applicants to confirm whether bird strike risk and the potential for the Applicant's habitat re-provision and creation proposals to give rise to adverse impacts on aviation interests were a factor in the site selection process and what (if any) alternatives were considered (including not delivering the Biodiversity Benefit Sites, noting that the provision of these sites is a voluntary commitment by the Applicants).</p>	The Applicants have provided a response to this matter within REP1-112 112.6.
REP1-112 112.10	<p>4.0 OTHER AVIATION RELATED SAFEGUARDING ASSESSMENTS</p> <p>4.1 BAE Systems' Relevant Representations (RR-208) highlighted the need for other aviation safeguarding assessments to be undertaken in connection with the proposed development and submitted to the Examination (such as safeguarding assessments in respect of communication, navigation and surveillance (CNS) equipment at Warton Aerodrome). BAE Systems has yet</p>	<p>The Applicants noted during Issue Specific Hearing 1 on aviation matters that the responsibility for any safeguarding assessment sits with BAE Systems on behalf of Warton Aerodrome.</p> <p>The Applicants are committed to providing the appropriate information to ensure the Transmission Assets do not affect the safe operation and development of Warton Aerodrome in relation to CNS. The Applicants will proactively assist in the provision of information should BAE Systems wish to undertake their own assessment and consider that this can be resolved alongside the Examination.</p>

Reference	Written Representation Comment	Applicants' response
	to discuss these matters with the Applicants and any appropriate safeguarding requirements which may need to be secured within the provisions of the draft DCO (Examination Library Document: AS-004) but will seek to engage in the requisite dialogue.	It is noted by the Applicants that the MOD Defence Infrastructure Organisation (DIO) Written Representation (REP1-075) stated that after reviewing the plans and documentation provided in the application the MOD has no technical safeguarding objections to the proposed development.
REP1-112 112.11	4.2 In the meantime, BAE Systems welcomes the Applicants' commitment to providing the appropriate information to ensure that the proposed development does not affect the safe operation and development of Warton Aerodrome in relation to Obstacle Limitation Surfaces (OLS), Instrument Flight Procedures (IFP) and radar and transmitter/receiver aerial surfaces (see page 14 of PDA-008).	<p>The Applicants welcome this representation and have been in dialogue with BAE Systems regarding the safeguarding requirements and are committed to providing the appropriate information to ensure the Transmission Assets do not affect the safe operation and development of Warton Aerodrome in relation to OLS and IFP. The Applicants will proactively assist in the provision of information / data should BAE Systems wish to undertake its own assessment and consider that this can be resolved alongside the Examination.</p> <p>This data will also allow BAE Systems to ensure obstacles can be appropriately charted in order to address these concerns and that appropriate aviation obstacle lighting can be fitted where required.</p>
REP1-112 112.12	<p>5.0 SOLAR FARM AT BARROWS LANE, WARTON</p> <p>BAE Systems' Relevant Representations (RR-208) referred to a solar farm at Browns Lane in Warton, the cables for which are currently being installed to connect Warton Aerodrome to the solar farm. The route of the cables for the solar farm crosses the Applicants' proposed cable corridor at [X]. This interaction is required to be appropriately managed in order to ensure that the co-existence of the cable infrastructure for the solar farm and that of the proposed development can be achieved.</p> <p>The Applicants' reference to Protective Provisions for the protection of electricity undertakers in the Applicants' Response to BAE Systems' Relevant Representations (see page 20 of PDA-008) (to be secured through Part 1 of Schedule 10 to the draft DCO (AS-004)) is noted. However, BAE Systems requires further dialogue with the</p>	<p>The Applicants note that Protective Provisions for the protection of electricity undertakers are secured through Part 1 of Schedule 10 to the draft DCO (REP1-008) which are for the protection of existing electrical assets and will be agreed directly with the relevant Statutory Undertakers.</p> <p>The Applicants can provide an update to BAE regarding the progress of discussions in relation to those Protective Provisions but it is ultimately the responsibility of an affected Statutory Undertaker to ensure that requisite protections are in place. The protective provisions secured in Part 1 of Schedule 10 to the draft DCO (REP1-008) are industry standard and based on recent precedent. The Applicants are not aware of any concerns raised by those relevant electricity undertakers to suggest they are not sufficient protections to ensure continued operations of the electricity infrastructure. While the developer of the solar farm at Browns Lane has not chosen to participate in the examination, the Applicants can commit to facilitating and/or attending separate, tripartite discussions between BAE, the solar farm developer and the Applicants if BAE consider this to be helpful.</p>

Reference	Written Representation Comment	Applicants' response
	Applicants in respect of this matter in order to be assured that the requisite protections are in place to ensure no adverse impact on operations at Warton Aerodrome and the ability of the Aerodrome to remain connected to and to draw power from the solar farm once it is operational.	

2.18 Blackpool Airport Operations Limited and Blackpool Airport Properties Limited

Table 2.16: REP1-115 –Blackpool Airport Operations Limited and Blackpool Airport Properties Limited

Reference	Written Representation Comment	Applicants' response
REP1-115 115.1	<p>1. Introduction</p> <p>1.1 This written representation is made in accordance with Deadline 1 of the examination timetable for the application by Morgan Offshore Wind Limited and Morecambe Offshore Windfarm Ltd (the “Applicants”) for development consent for the Morgan and Morecambe Offshore Wind Farms Transmission Assets project (the “Project”) by (1) Blackpool Airport Operations Limited (“BAOL”) and (2) Blackpool Airport Properties Limited (“BAPL”), together the “BA Entities”.</p> <p>1.2 As set out in the BA Entities’ relevant representations, [RR-0245] and [RR-0246] (the “RRs”), BAOL is the licensed operator of Blackpool Airport (the “Airport”). The land on which the Airport is situated is owned by BAPL. Both BAOL and BAPL are wholly owned subsidiaries of Blackpool Airport Limited, which is in turn wholly owned by Blackpool Council. The RRs also provide further background to the Airport’s operations and the BA Entities’ respective obligations in relation to the same.</p> <p>1.3 As noted in the RRs, the BA Entities’ interests in respect of the Project are considered broadly aligned at this stage. This written representation is therefore submitted on a joint basis. Where any particular matter applies to BAOL or BAPL only this is indicated below.</p>	<p>The Applicants acknowledge Blackpool Airport Operations Limited and Blackpool Airport Properties Limited position and welcome the ongoing engagement through negotiation of the co-operation agreement and technical meetings that have taken place since Deadline 1.</p>
REP1-115 115.2	<p>2. Cooperation Agreement</p> <p>2.1 As outlined by the Airport at OFH1, the Applicants and BAOL have been in detailed discussions regarding the works on the Airport’s operational land for several months, and are currently in the process of negotiating a cooperation</p>	<p>The Applicants and Blackpool Airport have been in detailed discussions and negotiations regarding the works on Blackpool Airport’s operational land for many months and the Applicants are of the view that positive progress has been (and continues to be) made between the parties. The key principle that the Airport requires to underpin the design of the Transmission Assets is that Blackpool</p>

Reference	Written Representation Comment	Applicants' response
	<p>agreement (the "Cooperation Agreement"), which is well-progressed. Given the commercially sensitive nature of the Cooperation Agreement, the BA Entities are not able to provide any substantive detail on its terms at this stage, but will keep the Examining Authority updated as required. The key principle that BAOL requires to underpin the Cooperation Agreement is to ensure the continued safe, efficient and uninterrupted operation of the Airport. All activities taking place within the Airport must also be to the satisfaction of the Airport's regulator (the Civil Aviation Authority, the "CAA").</p> <p>2.2 Whilst the BA Entities' key concerns are generally expected to be addressed through the Cooperation Agreement, there are certain issues on which the BA Entities may require further information and/or which may not be able to be addressed through the Cooperation Agreement. At this stage the BA Entities therefore consider it appropriate to draw the Examining Authority's attention to these matters, which are summarised in sections 3 to 7 below.</p> <p>2.3 For completeness, the BA Entities also summarise below the matters raised in the RRs which it is hoped will be adequately addressed within the Cooperation Agreement and are not therefore considered live issues as at Deadline 1:</p> <p>2.3.1 Construction techniques to be employed within the Airport;</p> <p>2.3.2 The extent of the works corridor within the Airport;</p> <p>2.3.3 Impacts on the Airport's operations during construction of the Project arising from matters such as dust and foreign object debris; and</p> <p>2.3.4 Impacts on the Airport during the operational phase of the Project, for example impacts on apparatus such as the Airport's nav aids (save as noted at section 5 below).</p>	<p>Airport is able to ensure the continued safe, efficient and uninterrupted operation of the Airport.</p> <p>The construction techniques to be used within Blackpool Airport, extent of the works corridor, dust and foreign object debris, nav aids and new matters that have arisen since submission of Relevant Representations are all matters currently under discussion with Blackpool Airport. The Applicants are confident that through those discussions the concerns raised can be addressed in full.</p>

Reference	Written Representation Comment	Applicants' response
	2.4 Concerns that have arisen since the date of the RRs in respect of (i) drainage / flood risk, (ii) permissible construction access routes to the Airport and (iii) the Airport's safeguarding obligations are also expected to be addressed through the Cooperation Agreement.	
REP1-115 115.3	<p>3. Construction sequencing and duration</p> <p>3.1 As was noted during OFH1 and ISH1, the draft development consent order currently confers total flexibility on the Applicants in respect of the construction sequencing of the two projects which comprise the Project, such that they may come forward concurrently or sequentially (subject to the proposed seven year time limit for implementation of the development consent order).</p> <p>3.2 The BA Entities listened to and acknowledge the Applicants' justification for this flexibility provided during the hearings, however it is clear that any impacts of the Project on the Airport's operations would be reduced to the extent that construction is able to take place concurrently and/or the overall construction period is able to be compressed. The BA Entities would therefore be supportive in principle of any controls in the development consent order which would secure this.</p>	The Applicants acknowledge and understand BAOL and BAPL's concerns and refer them to Annex 5.2 to the Applicants' response to Hearing Action Points: ISH1 6, 8, 9, 19, 26 & 28 (REP1-039) submitted at Deadline 1. Section 8 of REP1-039 sets out why flexibility has to be retained within the draft DCO (C1/F04) to allow for the projects to secure the most timely delivery of each individual project's infrastructure and to facilitate delivery of Critical National Priority (CNP) Infrastructure. There is no policy or other reasonable basis to justify any change to the draft DCO to require two independent projects to construct concurrently, which would also potentially cause delay to the delivery of CNP Infrastructure which would itself be contrary to the relevant NPS policy. The Applicants have also clearly explained in the Explanatory Memorandum (REP1-010) why the 7 year implementation period is necessary and justified for the Project. (See sections 1.6.6.8 to 1.6.6.11 and 1.7.2.5 to 1.7.2.6 of the Explanatory Memorandum (REP1-010)).
REP1-115 115.4	<p>4. Bird strike and interaction with the Airport's bird hazard area</p> <p>4.1 BAOL is required under aviation regulation to identify, manage and mitigate wildlife hazards, both within the Airport site itself and within a 13km radius of the site. The Airport has prepared and implemented a Wildlife Hazard Risk Assessment and Management Plan (the "BA WHRAMP", a copy of which is appended to these written representations) which amongst other things ensures that sufficient risk management processes are in place to effectively manage</p>	The Applicants do not consider that the Project will increase or alter the risk posed by bird strike to aircraft operating out of Blackpool Airport or that the Project will create an increased risk to public safety. The Applicants are committed to working with Blackpool Airport and other stakeholders (including BAE Systems) to ensure that stakeholders are confident in the Applicants' assessment conclusions and that Blackpool Airport's existing safeguarding systems and wildlife management plan (required under CAP 772: Wildlife hazard management at aerodromes) can continue to be complied with. The Applicants are engaging with Blackpool Airport (and BAE Systems) on a strategy for preparing a bespoke outline wildlife hazard management plan for the Transmission Assets. The strategy has been sent to Blackpool Airport (and BAE)

Reference	Written Representation Comment	Applicants' response
	<p>any bird strike risk, particularly from pink footed geese. BAOL would draw the Examining Authority's attention to the following sections of the BA WHRAMP:</p> <p>4.1.1 Section 0.5: Wildlife Hazard Assessment (pp.7-14), which sets out the identified bird strike risk within the Airport and the 13km safeguarding area.</p> <p>4.1.2 Section 0.6: Risk Assessment of Hazard Species (pp.15-29), which sets out the risk assessment in respect of specific bird species (in particular, section 0.6.1 addresses pink footed geese).</p> <p>4.1.3 Section 1.2.26: TEP/Blackpool Airport data showing locations of Geese 2023/4 (pp.99-100), which shows the bird strike safeguarding area together with levels of pink footed geese observed in the year 2023/24. Data from 2024/25 is currently awaited, but is understood to be largely unchanged, providing evidence that the current management regime is operating effectively to keep bird numbers at an acceptable level.</p> <p>4.2 The draft Outline Ecological Management Plan for the Project [APP-212] proposes a temporary construction mitigation area at Lytham Moss to mitigate general disturbance and potential impacts on geese, swan and wader feeding and roosting areas (paragraph 1.3.1.1 and Figure 1.3). This land falls within the Airport's safeguarding / bird hazard area under the BA WHRAMP (specifically field C1 shown at section 1.1.26 referred to above), and as a result is subject to existing arrangements to actively manage bird levels and dissuade large numbers from coming within close proximity of the Airport. Any improvement in the attractiveness of the habitat in the western area of the Moss would be most likely to involve the larger numbers currently found in the centre and east of the Moss, once they are subject to disturbance and disruption as a result of the Project,</p>	<p>for discussion and agreement. The Strategy for Wildlife Hazard Management Plan has been submitted at Deadline 2 (S_D2_14) to demonstrate the forward engagement plan with Blackpool Airport (and BAE). This document will support ongoing discussions between the Applicants, Blackpool Airport and BAE Systems ("BAE") with regards to the safeguarding of Blackpool Airport and Warton Aerodrome.</p> <p>In response to specific points noted by BAOL, the Applicants would like to draw attention to the fact that the Transmission Assets site specific surveys found large numbers of pink-footed goose already within Blackpool Airport's flight path from runway 28 (those areas coloured red, pink, orange and yellow in the figure titled 2023/2024 Winter Bird Survey- Geese Locations and Numbers from section 0.7 Wildlife Hazard Assessment (p 34)) and that the area predicted to be impacted by temporary habitat loss and disturbance covers much of these areas. The Applicants also note that the Transmissions Asset's proposed ecological mitigation area falls within the green area marked as C1 on this map. Currently there is ongoing goose and swan feeding taking place within C3, this is mitigation for the Queensway housing development and M55 link road and is known as the Farmland Conservation Area (FCA). The Applicants note that the Transmission Assets' proposal to feed geese in C1 is further east and away from the airport and flightpath than current FCA goose feeding area and that the current mitigation in C3 has not caused any increases in risks to public safety.</p>

Reference	Written Representation Comment	Applicants' response
	<p>relocating to the west, near the Airport. This would represent a demonstrable and unacceptable safety risk to aircraft arriving at and departing the Airport due to the threat of bird strike.</p> <p>4.3 This matter was discussed during ISH1, where the Applicants indicated that the ecological mitigation measures proposed are not intended to increase bird levels, but to maintain current levels across the wider assessment area. However, the BA Entities consider this to be a misunderstanding of the issue: it is not the overall numbers across the Moss area as a whole that the BA Entities are concerned by, but any increase in specific areas (i.e. at closer proximity to the Airport), which is exactly what the mitigation measures, as currently proposed, are intended to achieve at Lytham Moss.</p>	<p>Combined-count field data (TEP/BAOL) for Pink Footed Geese- total of 40 visits as part of Winter Bird Survey within the QFCA. Data uses totalcount recorded for each surveyed area and averaged over the number of visits.</p> <p>0 100 200 400 600 800 1,000 Metres</p> <p>Runway 28 end</p> <p>Rowland Homes Development Site</p> <p>C11</p> <p>C10 PG seen on 3 days- 2100 Total. Ave -700</p> <p>C9 PG seen on 9 days- 2152 Total. Ave -359</p> <p>C8 PG seen on 2 days- 884 Total. Ave -442</p> <p>C7 PG seen on 2 days- 647 Total. Ave -324</p> <p>C6 PG seen on 1 day-4 Total. Ave -5</p> <p>C5 PG seen on 2 days- 182 Total. Ave -91</p> <p>C4 0 PG seen</p> <p>C3 PG seen on 12 days- 4134 Total. Ave -345</p> <p>C2 PG seen on 6 days- 3379 Total. Ave -563</p> <p>C1 PG seen on 15 days-9606 Total. Ave -640</p> <p>The Applicants note Blackpool Airport's concerns and look forward to working with Blackpool Airport on the development of the surrounding strategy that accompanies the proposed mitigation. However, the Applicants also acknowledge that their advisors, who are expert ornithologists, predict that geese will most</p>

Reference	Written Representation Comment	Applicants' response
		<p>likely be displaced from the high risk zones in the runway approach due to the habitat loss and disturbance from cable burying activities that will take place here. The mitigation aims to provide resources for these displaced birds and relocate them to fields in C1 which is to the south of the runway approach (and further away than the current accepted FCA mitigation area) and outside of the amber and red risk zones. This is also closer to the existing Ribble Estuary roost site (located on the saltmarshes within the estuary). This may also lead to fewer geese crossing the flight path as they would have no need to fly further if their food, day habitat and roost area are closer together. The Applicants also note that there has been no increase in risk caused by the goose feeding in the FCA and propose that their mitigation could be managed in the same way with bird scaring tactics employed if risks were to increase.</p> <p>The Applicants consider that their mitigation plans at Lytham Moss are more likely to draw pink-footed geese further away from the Airport than they currently are. Therefore, there has been no misunderstanding of the safety concerns and the Applicants would refer Blackpool Airport to their own Birdstrike Mitigation Plan which has a green risk rating for geese despite Lytham Moss holding up to 10,000 geese at any one time and despite their being existing feeding of geese within the FCA which is supported by Blackpool Airport.</p> <p>The Applicants have updated the outline Ecological Management Plan (oEMP) at Deadline 2 (J6/F02) to provide further detail on the design and habitat mitigation measures that are proposed for each of the environmental mitigation and biodiversity benefit areas. The detailed EMPs will include the specific features provided for the displaced target species and will also consider where other species may be attracted and how this will affect wildlife movement patterns and subsequent wildlife attractant habitats risk assessment in response. Where possible, this will be based on case studies and evidence from other projects. Where appropriate, indicative locations of specific features will be identified. Information will also be provided on the ongoing management measures that will be implemented during the construction and operation of the Transmission Assets (e.g. cutting rotations) following the identification of any elevated bird strike risk (CAP 772 Chapter 4 – Risk Identification. The measures will take into account the guidance within CAP 772 Wildlife hazard management at aerodromes (CAA, 2017) Chapter 5 – Habitat Management). This information will be provided to</p>

Reference	Written Representation Comment	Applicants' response
		Natural England, BAE Systems and Blackpool Airport. This commitment is explained within the Strategy for Wildlife Hazard Management Plan (S_D2_14)) submitted at Deadline 2 and has been sent to BAE and Blackpool Airport. Blackpool Airport and BAE provided comment on the strategy and amendments have been incorporated into the version submitted into Examination.
REP1-115 115.5	4.4 In addition, the proposed construction compound to the east of Queensway (Works No. 18A/B) also lies within the Airport's safeguarding / bird hazard area. This could itself become an attraction to birds such as gulls, and therefore constitute a bird strike risk, unless managed appropriately.	<p>The Applicants do not consider that the Project will increase or alter the risk posed by bird strike to aircraft operating out of Blackpool Airport or that the projects will create an increased risk to public safety. The Applicants are committed to working with Blackpool Airport and other stakeholders (including BAE Systems) to ensure that stakeholders are confident in the Applicants' assessment conclusions and that Blackpool Airport's existing safeguarding systems and wildlife management plan (required under CAP 772) can continue to be complied with. The Applicants are engaging with Blackpool Airport (and BAE Systems) on a strategy for preparing an outline Wildlife Hazard Management Plan for the Transmission Assets. This document will be used to support ongoing discussions between the Applicants, Blackpool Airport and BAE with regards to the safeguarding of Blackpool Airport and Warton Aerodrome.</p> <p>It is intended that measures to dissuade gulls and other generalist foragers will be covered by this plan and agreed in consultation with Blackpool Airport. These measures will also be committed to within an update to the outline Code of Construction Practice at an appropriate deadline following discussion on the outline Wildlife Hazard Management Plan. This commitment is explained within the Strategy for Wildlife Hazard Management Plan (S_D2_14) submitted at Deadline 2. Blackpool Airport provided comment on the strategy and amendments have been incorporated into the version submitted into Examination.</p>
REP1-115 115.6	<p>4.5 During the hearings it was also noted that the Applicants intend to prepare a draft outline bird strike management plan for review by the BA Entities, and other interested parties concerned by bird strike risk (such as BAE Systems).</p> <p>4.6 The BA Entities welcome further discussions with and assessment work from the Applicants on this matter, however at this stage it is unclear the extent to which the heightened bird strike risk can be satisfactorily mitigated whilst the Lytham</p>	<p>The Applicants do not consider that the Project will increase or alter the risk posed by bird strike to aircraft operating out of Blackpool Airport or that the projects will create an increased risk to public safety. As discussed above, the Applicants have engaged with Blackpool Airport on a strategy for preparing an outline Wildlife Hazard Management Plan for the Transmission Assets. This commitment is explained within the Strategy for Wildlife Hazard Management Plan (S_D2_14) submitted at Deadline 2.</p>

Reference	Written Representation Comment	Applicants' response
	Moss mitigation site remains in its proposed location, for the reasons outlined above.	<p>An outline of the proposed steps was discussed with Blackpool Airport on 9 May, and the Strategy for Wildlife Hazard Management Plan (S_D2_14) was sent to Blackpool Airport on 29 May. The document outlines the steps that the Applicants are proposing to undertake to work with Blackpool Airport. Comments were received from Blackpool Airport and amendments were made accordingly.</p> <p>The Applicants have committed to working with Blackpool Airport Operations Limited as aerodrome operator to review and update their existing bird strike risk assessment following a wildlife attractant habitats risk assessment for all on-aerodrome and off-aerodrome areas within the study area to be undertaken by the Transmission Assets. The wildlife attractant habitat risk assessment will identify any bird species and changes in populations which may be attracted to the works areas due to increase in potential food sources, standing water or any other factor which may attract birds. This commitment is explained within the Strategy for Wildlife Hazard Management Plan (S_D2_14) submitted at Deadline 2 and has been sent to Blackpool Airport.</p> <p>The Applicants strongly believe that management of bird strike risk is achievable, as demonstrated by the ongoing management undertaken by Blackpool Airport under their existing Wildlife Hazard Management Plan.</p> <p>Following discussion with aviation stakeholders, the Applicants have updated Requirements 8, 10 and 12 of the draft DCO (C1/F04) submitted at Deadline 2 to include Blackpool Airport as a named consultee. Relevant updates to the related outline management plans will be submitted at Deadline 3.</p>
REP1-115 115.7	<p>5. Impacts arising from electromagnetic fields (“EMF”)</p> <p>5.1 The BA Entities have concerns regarding the possible impact of EMF arising from the Project's cables on Airport infrastructure and operations. The possible nature and extent of this impact is not yet understood and further assessment work is required.</p> <p>5.2 The BA Entities note that the Applicants have commissioned RINA to undertake an EMF desktop study considering EMF impacts at the Airport – the BA Entities welcome this but are liaising with the Applicants to seek to</p>	<p>The Applicants welcome this representation and confirm that they are working with BA to understand the possible nature and extent of this effect (if any).</p> <p>BA will be consulted on the output of any studies, and should any mitigation be required (which the Applicants do not consider likely), the scope of such mitigation will be aligned with BA. The Applicants note the scope requests provided by BA and are considering this within the context of the information to be required in support of the CAP791 process and the relevant industry guidance on EMF assessments for underground cables inside the airport perimeter.</p>

Reference	Written Representation Comment	Applicants' response
	<p>understand the scope of the assessment, in order to ensure that it is adequate and will consider the impacts of EMF on all relevant Airport receptors (being (i) aircraft and helicopters, especially aircraft using fly-by-wire; (ii) Airport nav aids; (iii) Airport cabling and general cabling adjacent to the proposed cable route; (iv) Airport employees, users and other visitors; and (v) communications equipment, both installed and hand held).</p> <p>5.3 In any event, the BA Entities must reserve their position in respect of EMF impacts pending the outcome of satisfactory assessments and an understanding of what mitigation may be available to adequately address any impacts identified.</p>	
REP1-115 115.8	<p>6. Land sterilisation</p> <p>6.1 The BA Entities, in particular BAPL, are keen to ensure that the Project does not result in the sterilisation of any land within the Airport from future Airport and other development. Discussions are ongoing between the land agents appointed by the BA Entities and the Applicants in this regard, and it is hoped that a satisfactory outcome can be reached.</p>	<p>The Applicants confirm that discussions between the appointed land agents is ongoing and that the Applicants will continue to work with BAPL and BAOL to satisfactorily resolve these concerns during Examination.</p> <p>Heads of Terms have been issued to Blackpool Airport and Blackpool Borough Council, latest sent 19th March 2025, and acknowledged by both DWF and their appointed agent Peter Roberts. Engagement on Heads of Terms is progressing with the latest engagement on 1st May.</p>
REP1-115 115.9	<p>7. DCO controls</p> <p>7.1 Finally, notwithstanding the fact that bespoke mitigations are sought to be agreed with the Applicants through the Cooperation Agreement, it is recognised that there may be Project-wide development consent order requirements / control documents that have relevance to and/or would benefit the BA Entities. The BA Entities are therefore engaging with the Applicants on which requirements / control documents the BA Entities should be consulted on, and any consequential amendments to the draft development consent order will be captured by the Applicants in due course.</p>	<p>Following discussion with BAOL, the Applicants have updated Requirements 8, 10 and 12 of the draft DCO (C1/F04) submitted at Deadline 2 to include BAOL as a named consultee. Relevant updates to the related outline management plans will be submitted at Deadline 3.</p>

Reference	Written Representation Comment	Applicants' response
REP1-115 115.10	<p>8. Conclusion</p> <p>8.1 The BA Entities require the Applicants to demonstrate that the Project will not affect the Airport's safe, efficient and uninterrupted operations. Discussions with the Applicants have been constructive and largely positive to date and the BA Entities are hopeful that many of their concerns will be satisfactorily addressed through the Cooperation Agreement.</p> <p>8.2 However, at this point there are matters which require further consideration, and in some cases may fall outside of the scope of the Cooperation Agreement.</p> <p>8.3 BAOL is also under a duty to the CAA, who will need to approve all works within the Airport, to ensure the Airport's regulatory compliance. In particular, as was discussed during the hearings, works within the Airport's licensed aerodrome require approval under the CAA's CAP791 process. A separate technical note summarising the CAP791 process is being submitted by the BA Entities at Deadline 1, as agreed at ISH1.</p> <p>8.4 As referenced above, BAOL is similarly under a legal duty in respect of safeguarding. BAOL has robust safeguarding procedures in place and is working with the Applicants to ensure that all construction activities falling within the Airport's safeguarding areas are adequately safeguarded and, where necessary, appropriate mitigations are secured.</p>	<p>The Applicants welcome this response and are closely working with BA to ensure that BA's obligations under the Air Navigation Order (ANO, 2016) and its requirements to the CAA, under its Aerodrome License (regulatory compliance), are safeguarded; primary achieved through adherence to the CAP791 requirements.</p>

2.19 Cadent Gas Limited

Table 2.17: REP1-118 – Cadent Gas Limited

Reference	Written Representation Comment	Applicants' response
REP1-118 118.1	<p>INTRODUCTION</p> <p>Cadent Gas Limited ("Cadent") is a licensed gas transporter under the Gas Act 1986, with a statutory responsibility to operate and maintain the gas distribution networks in North London, Central and North West England. Cadent's primary duties are to operate, maintain and develop its networks in an economic, efficient and coordinated way.</p> <p>Cadent has made a relevant representation in this matter which was accepted by the Examining Authority as an additional submission [AS-058] in order to protect apparatus owned by Cadent. Cadent does not object in principle to the development proposed by the Applicant.</p> <p>Cadent is holder of a licence under Section 7 of the Gas Act 1986 and operates four gas distribution networks in North London, Central England (West and East) and the North West. Cadent is required to comply with the terms of its Licence in the delivery of its statutory responsibilities. It is regulated by the Network Code which contains relevant conditions as to safe transmission of gas and compliance with industry standards on transmission, connection and safe working in the vicinity of its Apparatus, to which see paragraph 2.</p> <p>Cadent has low, medium, intermediate and high pressure gas pipelines and associated apparatus located within the order limits which are affected by works proposed as indicated by the numerous references to Cadent in the Book of Reference.[APP-015]. Cadent's rights to retain its apparatus in situ and rights of access to inspect, maintain, renew and repair such apparatus located within or in close proximity to the order</p>	<p>The Applicants acknowledge and note Cadent Gas Limited's (Cadent) written representation and their role as a statutory undertaker.</p> <p>The Applicants are aware of Cadent's apparatus located within the Order Limits and have been actively negotiating bespoke protective provisions to provide adequate protection in this regard. The Applicants thank Cadent Gas for their continued engagement.</p>

Reference	Written Representation Comment	Applicants' response
	<p>limits need to be maintained at all times and access to inspect such apparatus must not be restricted.</p> <p>Cadent has identified that it will require adequate protective provisions to be included within the DCO to ensure that its apparatus and land interests are adequately protected and to include compliance with relevant safety standards.</p> <p>Cadent wish to ensure appropriate land rights are available for any diversion of their assets sitting outside the adopted highway boundary and will require consent to be granted where there are proposals to work within the easement strip of any existing Cadent's Apparatus.</p>	
REP1-118 118.2	<p>REGULATORY PROTECTION FRAMEWORK</p> <p>Cadent require all Applicants carrying out development in the vicinity of their Apparatus to comply with:</p> <p>(a) CD/SP/SSW/22 Cadent's policies for safe working in the vicinity of Cadent's Assets;</p> <p>(b) ICE (institution of Gas Engineers) recommendations IGE/SR/18 Edition 2 Safe Working Practices to Ensure the Integrity of Gas Pipelines and Associated Installations, and</p> <p>(c) the HSE's guidance document HS(G)47 Avoiding Danger from Underground Services.</p> <p>The industry standards referred to above have the specific intention of protecting:</p> <p>(a) the integrity of the pipelines and thus the distribution of gas;</p> <p>(b) the safety of the area surrounding gas pipelines;</p> <p>(c) the safety of personnel involved in working with gas pipelines.</p> <p>Cadent requires specific protective provisions in place for an appropriate level of control and assurance that the industry</p>	<p>The Applicants note the regulatory framework which the Applicants must comply with when carrying out development within the vicinity of Cadent apparatus and confirm that they are negotiating bespoke protective provisions to ensure the appropriate protections are in place for Cadent's apparatus and to ensure compliance with this regulatory framework as appropriate.</p>

Reference	Written Representation Comment	Applicants' response
	regulatory standards will be complied with in connection with works in the vicinity of Cadent's Apparatus.	
REP1-118 118.3	<p>PROTECTIVE PROVISIONS</p> <p>Cadent seeks to protect its statutory undertaking, and insists that in respect of works in close proximity to their Apparatus as part of the authorised development the following procedures are complied with by the Applicant:</p> <p>(a) Cadent has had the opportunity to review and consent to the plans, methodology and specification for works within 15 metres of any Apparatus, works which will adversely affect their Apparatus or otherwise breach distances/guidance set out in paragraph 2 above.</p> <p>(b) DCO works in the vicinity of Cadent's apparatus are not authorised or commenced unless protective provisions are in place preventing compulsory acquisition of Cadent's land or rights or overriding or interference with the same.</p> <p>(c) DCO works in the vicinity of Cadent's apparatus are not commenced unless there is third party liability insurance effected and maintained for the construction period of the relevant authorised works and that the person or body undertaking the works (acknowledging the ability to transfer the benefit of the DCO) has the appropriate net worth to enable it to meet any liability arising from damage to Cadent's apparatus (acknowledging the potential significant consequences of damaging a gas pipeline) or there is appropriate security in place through a bond or guarantee.</p> <p>Cadent maintain that without an agreement or qualification on the exercise of unfettered compulsory powers or works in the vicinity of its Apparatus the following consequences will arise:</p> <p>(a) Failure to comply with industry safety standards, legal requirements and Health and Safety Executive standards create a health and safety risk.</p>	As already noted above, the Applicants are engaging with Cadent in order to agree the bespoke protective provisions included in Part 6, Schedule 10 of the draft Development Consent Order (DCO) (C1/F04). The Applicants consider that, once agreed, these protective provisions will provide Cadent with the protections it requires for its apparatus and land interests.

Reference	Written Representation Comment	Applicants' response
	<p>(b) Any damage to Apparatus has potentially serious hazardous consequences for individuals/property located in the vicinity of the pipeline/apparatus if it were to fail.</p> <p>(c) Potentially significant consequences arising from lack of continuity of supply;</p> <p>Insufficient property rights have the following safety implications:</p> <p>(a) Inability for qualified personnel to access apparatus for its maintenance, repair and inspection.</p> <p>(b) Risk of strike to pipeline if development occurs within the easement zone in respect of which an easement/restrictive covenant is required to protect the pipeline from development.</p> <p>(c) Risk of inappropriate development within the vicinity of the pipeline increasing the risk of the above.</p>	
REP1-118 118.4	<p>The dDCO [AS-004] contains specific Protective Provisions for the protection of Cadent, but they are deficient in a number of respects. Cadent have been in discussions with the Applicant and understands that the next draft of the dDCO should include amendments to Cadent's protective provisions which address a number of its concerns. Two matters, however, remain outstanding and these need to be addressed through a side agreement, if the requirements are not to appear on the face of the DCO.</p> <p>In particular, definitions related to acceptable insurance and security and related text need to be included in paragraph 2 and 11 in a side agreement as set out in the Schedule to this Representation.</p> <p>Provision needs to be included within the dDCO or in a side agreement that the works in the vicinity of Cadent's apparatus are not commenced unless: (1) there is third party liability insurance effected and maintained for the construction period of the relevant works; and (2) the person or body undertaking</p>	<p>The Applicants confirm that they provided an updated set of protective provisions for Cadent in the draft DCO at Deadline 1 (REP1-008).</p> <p>The Applicants acknowledge the points made by Cadent concerning insurance and indemnity provisions. The Applicants confirm that they are negotiating separate commercial agreements with Cadent to resolve these matters.</p> <p>As confirmed in Part 2 of the Land Rights Tracker (REP1-065), the Applicants are confident that the protective provisions and separate commercial agreements can be agreed before the close of examination to ensure that Cadent's apparatus and land interests are adequately protected and that there will be no serious detriment to the carrying on of Cadent's undertaking.</p>

Reference	Written Representation Comment	Applicants' response
	<p>the works (acknowledging the ability to transfer the benefit of the DCO) has the appropriate net worth at the time of commencing works to enable it to meet any liability arising from damage to Cadent's apparatus or that there is appropriate security in place through a bond or guarantee.</p> <p>Insurance and appropriate security are required given the nature of the apparatus in the vicinity of the development and the current financial standing of the Applicants. As recorded in the Funding Statement which accompanies the application [APP-008]:</p> <p>(a) Morgan Offshore Wind Limited is a special purpose vehicle which does not currently hold substantial assets or revenue generating ability. The necessary financial and fund sets or revenue generating ability. The necessary financial and funding support comes from the Morgan Shareholders bp plc and EnBW; and</p> <p>(b) Morecambe Offshore Wind Farm Limited is also a special purpose vehicle which does not currently hold substantial assets or revenue generating ability. The necessary financial and funding support comes from its shareholders and ultimate parent companies i.e. Flotation Energy and Cobra Instalaciones y Servicios S.A (the Morecambe Shareholders).</p> <p>The security provisions are required to support the indemnity provided and to address a situation where the conditions of insurance are not met. In particular, the security measures contained in the Cadent Protective Provisions are required in order to provide certainty that the indemnity afforded to Cadent can be relied upon in the event that damage is caused to the Apparatus and the gas distribution network.</p> <p>Cadent derives no benefit from the Project and needs to ensure that it is not be exposed to any costs or losses as a result of the Project. Money spent and costs incurred by Cadent is ultimately passed on to consumers in their energy</p>	

Reference	Written Representation Comment	Applicants' response
	<p>bills. This is not appropriate in respect of losses caused by a third party and Cadent requires, therefore, the comfort that works near its apparatus are the subject of appropriate insurance and security.</p> <p>For the purposes of the Planning Act 2008 and section 127, Cadent is a statutory undertaker and the land included within the order limits is statutory undertakers' land. Cadent require the above additional protections to ensure that there is no serious detriment to the carrying on of Cadent's undertaking. Cadent contend that it is essential that the above outstanding issues are addressed to their satisfaction to ensure adequate protection for their Apparatus and so that Protective Provisions consistent with their standard terms are provided.</p>	
REP1-118 118.5	<p>APPENDIX</p> <p>AMENDMENTS REQUIRED TO PROTECTIVE PROVISIONS IN PART 6 OF SCHEDULE 10</p>	Cadent's preferred protective provisions are acknowledged and noted.

2.20 Newton with Clifton and Freckleton Parish Council

The Applicants' response to the WR of Newton with Clifton and Freckleton Parish Council (REP1-183) is provided in Annex 3.4 to Applicants' Response to WRs from Statutory Consultees: Newton with Clifton and Freckleton Parish Council (Document Reference: S_D2_3.4).

2.21 Orsted IPs

Table 2.18: REP1-188 –Orsted IPs

Reference	Written Representation Comment	Applicants' response
REP1-188.1	<p>Introduction</p> <p>This written representation is provided in accordance with Deadline 1 of the examination timetable for the application Morgan Offshore Wind Limited and Morecambe Offshore Wind Limited (the “Applicants”) for an order granting development consent for the Morgan and Morecambe Offshore Wind Farms Transmission Assets (“Project”).</p> <p>We represent six owners of operational offshore windfarms in the East Irish Sea (as set out relevant representations RR-0218, RR-0276, RR-1558, RR2303, RR-2266, RR-2267), who we refer to together as the “Ørsted IPs” for the purposes of this written representation.</p> <p>The Ørsted IPs’ developments can be seen on Figure 9.4, Chapter 9 of the Environmental Statement (the “ES”) [APP-066].</p> <p>The Ørsted IPs do not object to the Project in principle, however, have some concerns regarding the Applicants’ approach to the environmental assessment for the Project, as raised in their relevant representations and set out below. The Ørsted IPs note the Applicants’ comments in response to their relevant representations at procedural deadline A [PDA-007]. However, their concerns are not resolved.</p>	The Applicants note this comment.
REP1-188.2	<p>Wildlife Impacts/Environmental Assessment</p> <p>Given the increasingly complex nature of the existing and proposed development environment in the East Irish Sea, the</p>	The adequacy of the cumulative effects assessment in respect of Barrow OWF was addressed by the Applicants’ response to Relevant Representations (RR-0218 0218.3 of REP1-225). Furthermore the Applicants are not aware of any evidence submitted to this examination from the Ørsted IPs that the anticipated

Reference	Written Representation Comment	Applicants' response
	<p>Ørsted IPs have an interest in ensuring the EIA for the Project accurately assesses the potential effects of the Project on wildlife and identifies appropriate mitigation.</p> <p>As flagged in Barrow Offshore Windfarm Limited's relevant representation, Barrow Offshore Wind Farm ("Barrow OWF") has incorrectly been excluded from the Applicants' cumulative effects assessments. The Ørsted IPs have addressed this issue extensively in the examinations for the applications for development consent order for both the Morgan and Morecambe offshore wind farms (the "Generation Assets").</p> <p>The Applicants have stated, in [PDA-007] that "Any plans for future upgrading and repowering of the Barrow OWF have been assumed to be subject to separate consents and/or approvals, and therefore cannot be assessed by the Applicants at this stage".</p> <p>As explained in the relevant representations and throughout the examination of the Generation Assets, Barrow OWF does not require any new consents nor amendment to existing consents to continue operating beyond 2030.</p> <p>The operational consent for Barrow OWF is not time limited. There is no requirement in any of the licences held for Barrow OWF for the asset to be decommissioned at a particular date. There is no reasonable basis for excluding this asset from the Project's environmental assessments.</p> <p>Additionally, the Ørsted IPs have undertaken technical investigations regarding the asset integrity of their portfolio, in particular of Barrow OWF, and considers it is technically capable of operating beyond 2030. This information was submitted in the examination of the Morecambe Offshore Wind Generation Assets, and therefore the Applicants are well aware of this position.</p> <p>Failure to include Barrow OWF is irrational and would be a failure to accurately describe the environmental baseline and</p>	<p>approvals which would be needed to extend the lifetime of the Barrow OWF (as currently licensed or as assessed in its Environmental Statement) are not required.</p> <p>In response to a written question 1GEN10 (EN010121-PD-011) for the Morecambe Generation Assets examination the MMO stated (EN010121-REP3-085):</p> <p><i>The MMO attended a meeting with Barrow Offshore Wind Limited on 15 January 2025 to discuss 1GEN10. The MMO notes that the Barrow Offshore Wind Limited is aware that it currently holds two active licences with the MMO (L/2016/00297/4 and L/2015/00281/1). The MMO and Barrow Offshore Wind Limited both agreed within this meeting that should works be required post 2030, then a new Marine Licence application will be submitted. A new licence would be submitted for any decommissioning activities.</i></p> <p>The Applicants therefore consider that this clarifies that a further consent would be required for Barrow OWF to continue operating post 2030.</p> <p>The Applicants have carried out the assessments for the Transmission Assets on the basis of the information available in the public domain (which in the case of Barrow OWF includes the Environmental Impact Statement (EIS) prepared in May 2002 which provides for an "operational period of 20 years"), in accordance with EIA best practice. It is considered reasonable and appropriate to assume that projects cumulatively assessed will be constructed and operated in accordance with the consent and assessment for that project. The Applicants consider this is an appropriate principle on which to conclude the cumulative assessment in the EIA for the Transmission Assets is appropriate.</p> <p>In respect of the compensation required under the Habitats Regulations for potential impacts on red throated diver please see the Applicants' comments on the Natural England Risk and Issue Log (S_D2_3.3) at Deadline 2.</p>

Reference	Written Representation Comment	Applicants' response
	<p>its likely evolution as required by the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 ("EIA Regulations"). Barrow OWF is able to continue to operate beyond 2030 without any further operational consents and it is not for the Applicants to make assumptions regarding a potential decommissioning date, especially given that the Ørsted IPs have reiterated the likely continued operation of the windfarm in this and other DCO examinations. On the basis of the information before the Applicants, Barrow OWF should be included in the assessments of the Project.</p> <p>Additionally, the Ørsted IPs remain concerned regarding the possible uncertainty of compensation measures that may be required in respect of the Project's impact on red throated divers, a protected feature of the Liverpool Bay SPA. The Applicants have stated, in [PDA-007] that the Project will have no adverse effects on red-throated diver and therefore no compensation is proposed. However, as outlined in the Applicant's response to Natural England's relevant representation [PDA-014] Natural England does not agree with this conclusion, and that discussions are ongoing regarding "...potential impacts and any further mitigation measures required". Therefore, the Ørsted IPs consider uncertainty remains regarding possible compensation which may be implemented.</p>	
REP1-188 188.3	<p>Shipping and navigation</p> <p>The Ørsted IPs maintain that the Project does not provide for adequate engagement with interested parties in respect of shipping and navigation issues. Given the number of vessel movements and stakeholders with interests in this region, it is important that a robust engagement process is secured.</p> <p>As outlined in the Ørsted IPs relevant representations, the outline vessel traffic management plan ("OVTMP") does not adequately specify how interested parties will be consulted with</p>	<p>Please see the Applicants' response to the Ørsted IP's relevant representations (RR-0218.4, 0276.4, 1558.3, 2303.4, 2266.4, 2267.4 of The Applicants' Response to Relevant Representations Part 2 - Affected parties and statutory consultees (PDA-007)). With respect to the MNEF the Applicants' records show that the meeting on 8 February 2024 was not the first that the Ørsted IPs were invited to attend. As noted in the Applicants' response to relevant representations (RR-0218.4, 0276.4, 1558.3, 2303.4, 2266.4, 2267.4 of REP1-225), and as set out in Table 7.5 of Volume 2, Chapter 7: Shipping and navigation (APP-056), Ørsted attended MNEF meetings on 18 January 2023 (MNEF 4), 21 September 2023 (MNEF 5) and as noted by Ørsted IPs, 8 February 2024 (MNEF 6) (MNEF</p>

Reference	Written Representation Comment	Applicants' response
	<p>in respect of the detailed VTMPs. The Ørsted IPs seek to be specifically names as consultees, rather than relying on the blanket provision for engagement with “existing sea users”. Additionally, details such as the matters for and timing of engagement should be specified.</p> <p>The Ørsted IPs also maintain that greater specificity is required regarding the Marine Navigation Engagement Forum, including in respect of membership and how it will be secured in the long term. The Ørsted IPs seek to be named specifically as consultees in that document, to provide certainty they will be engaged with as necessary.</p> <p>It is acknowledged that important details, such as port location, will not be known until much later in the process. As such, it is important for clear and precise methods of engagement with interested parties to be secured.</p> <p>The Ørsted IPs note, in response to the Applicants comments regarding their previous engagement through the MNEF that the first invitation they received to attend the MNEF was in relation to the sixth meeting of the MNEF on 8 February 2024.</p>	<p>meetings 1 – 3, which were held in late 2021 and through 2022 are not recorded in APP-056 or the Technical Engagement Plan (APP-189) as the focus of those meetings was on the Morecambe Generation Assets, Morgan Generation Assets and Mona Offshore Wind Project with only brief updates on the Morgan and Morecambe Transmission Assets owing to the consenting process for the Transmission Assets still being subject to the Holistic Network Design (HND) and Section 35 direction processes, which were concluded at the end of 2022 ahead of MNEF 4 on 18 January 2023).</p> <p>The Applicants have committed in Table 7.5 in Volume 2, Chapter 7: Shipping and Navigation of the Environmental Statement (APP-056) to maintain the MNEF post-consent (should consent be granted). This commitment will be updated at Deadline 3 to confirm that the MNEF will be maintained through the pre-construction phase and for a minimum of five years into the operation and maintenance phase. This is to align with similar commitments made in the project-specific outline VTMP by both Morgan Generation Assets and Morecambe Generation Assets. The purpose of the post-consent MNEF will be to ensure that the appropriate authorities and stakeholders are informed of works being carried out in waters adjacent to the Project. The Applicants anticipate that the frequency of MNEF meetings will be agreed with the group at the first meeting post-consent when the Applicants have a better understanding of the pre-construction programme and programme for preparation of key pre-commencement documents including the final VTMP. The MNEF has been and will be an open forum and will be inclusive for any additional stakeholders who may wish to attend it at any point in the future.</p> <p>As set out in the Applicants' Response to Relevant Representations Part 2 - Affected parties and statutory consultees (PDA-007) referenced above, it would not be appropriate for a commercial organisation to be named as a consultee in approving the VTMP, which will be issued for approval to the MMO in consultation with the MCA and Trinity House. However, the Applicants have made the commitment above to secure continuation of the MNEF post-consent and for a minimum of five years into the operation and maintenance phase, to which the Ørsted IPs will be invited.</p>

Reference	Written Representation Comment	Applicants' response
REP1-188 188.4	<p>Climate Change/GHG Assessment</p> <p>The Ørsted IPs maintain that the Applicants assessment of the Project's effects in terms of climate change [APP-138] requires to be updated.</p> <p>The assessment considers the GHG emissions of the Project, cumulatively with the impacts of the Generation Assets (refer to section 1.13). As outlined in the Ørsted IPs relevant representations, the GHG assessments for the Generation Assets have been updated to reflect loss of renewable energy generation at their assets due to the wake effects of the Generation Assets.</p> <p>However, these updates have not been carried through to the cumulative assessment for the Project and therefore it is not accurate. We note the Applicants' statement in [PDA-007] that: "The Applicants consider that the submitted GHG assessment (APP-139) does not need to be updated to reflect the updated assessments submitted to the examinations for the Generation Projects as the conclusions regarding significance have not been altered".</p> <p>The Ørsted IPs consider it is important that the information before the Secretary of State is accurate, so that it can robustly assess the merits of the Project, regardless of whether any conclusions as to significance of effect are altered.</p> <p>Further, it is important to note that the updated assessments for the Generation Assets are overly conservative and do not reflect a realistic worst-case scenario. The assessments do not account for total long-term loss of generation from surrounding developments, whose ability to continue operating may be jeopardised by the Generation Assets. The Applicants are not in a position to make conclusions regarding the significance of the effect until they are properly assessed.</p>	<p>Please see the Applicants' response to the Ørsted IPs' relevant representations (RR-0218.5, 0276.5, 1558.4, 2303.5, 2266.5, 2267.5 of REP1-225).</p> <p>With respect to the points raised in the Ørsted IPs WR, the Applicants have presented a sensitivity analysis below to demonstrate that the revised figures for net greenhouse gas (GHG) emissions presented in the Morecambe OWF climate change chapter have no impact on the conclusions on the significance of effects presented within the Transmission Assets climate change chapter (APP-138).</p> <p>The below figures are the net GHG emissions that were presented within the Transmission Assets' climate change chapter (APP-138), paragraph 1.13.2.15. To reconfirm the scenarios are as follows: Scenario 1: Transmission Assets together with Morecambe Offshore Windfarm: Generation Assets; Scenario 2: Transmission Assets together with Morgan Offshore Wind Project: Generation Assets; and Scenario 3: Transmission Assets together with Morgan Offshore Wind Project: Generation Assets and Morecambe Offshore Windfarm: Generation Assets.</p> <ul style="list-style-type: none"> • Scenario 1: between 353,073 and -34,669,172 tCO₂e • Scenario 2: between 33,306 and -50,973,394 tCO₂e • Scenario 3: between 28,258 and -86,000,687 tCO₂e. <p>The below net GHG emissions for each Scenario include the latest net GHG emission figures presented for the Morgan and Morecambe Generation Assets, accounting for the loss of avoided emissions arising from wake loss effects on the Ørsted IPs' projects:</p> <ul style="list-style-type: none"> • Scenario 1: between 382,244 and -34,291,390 tCO₂e • Scenario 2: between 33,306 and -50,973,394 tCO₂e • Scenario 3: between 57,429 and -85,622,905 tCO₂e <p>As illustrated above, there are no large changes to the net GHG emission figures included within the Transmission Assets climate change chapter (APP-138) as a result of applying the updated Morgan and Morecambe Generation figures. The marginal change to the net GHG emissions does not impact or affect the conclusions on significance presented in paragraphs 1.13.2.20 to 1.13.2.22 (within the Transmission Assets climate change chapter (APP-138)).</p>

Reference	Written Representation Comment	Applicants' response
	<p>This issue has been raised in the examinations for the Generation Assets and remains unresolved. The parties are awaiting the Secretary of State's determination of this issue.</p> <p>In light of the above, it is not appropriate for the Applicants to rely on outdated data regarding the GHG emissions from the Generation Assets as the basis for its environmental assessment of the Project.</p>	<p>The Applicants' position remains consistent with that of the response to the Ørsted IPs relevant representations (RR-0218.5, 0276.5, 1558.4, 2303.5, 2266.5, 2267.5 of REP1-225) noting that the submitted GHG assessment Annex (APP-139) and climate change chapter (APP-138) do not need to be updated to reflect the updated assessments submitted to the examinations for the Generation Projects as the conclusions regarding significance have not been altered.</p>

2.22 SABIC UK PETROCHEMICAL S LIMITED AND SABIC PETROCHEMICALS BV

Table 2.19: REP1-195 –SABIC UK PETROCHEMICAL S LIMITED AND SABIC PETROCHEMICALS BV

Reference	Written Representation Comment	Applicants' response
REP1-195 195.1	<p>2. SUMMARY OF SABIC'S POSITION</p> <p>2.1 SABIC made a relevant representation in relation to the Application to protect its position in relation to the following key concerns:</p> <p>2.1.1 To adequately protect its assets from the authorised works, compulsory acquisition, temporary possession and diversion.</p> <p>2.1.2 To ensure that suitable and adequate indemnity and insurance provisions are included in the Order.</p> <p>2.1.3 To ensure that SABIC Petrochemicals BV benefits from the protection of that indemnity and those insurance provisions.</p> <p>2.2 More details about SABIC's operations and concerns are set out below.</p> <p>2.3 SABIC does consider that its concerns are capable of being allayed by protective provisions. However such protections must be both suitable and adequate.</p> <p>2.4 SABIC provided the Applicant with its standard protective provisions for its pipelines on 1 April 2025.</p> <p>2.5 SABIC presently awaits the Applicant's comments on this document and the extent of any agreement and disagreement between the parties is therefore not currently known.</p> <p>2.6 In light of the above, SABIC does not consider that it is possible at present to submit a meaningful Statement of Common Ground, as requested by the ExA.</p>	<p>The Applicants thank SABIC UK Petrochemicals Limited and SABIC Petrochemicals BV (SABIC) for its written representation and its continued engagement and hope that this will lead to agreement on protective provisions and a Statement of Common Ground.</p>
REP1-195 195.2	<p>3. SABIC'S OPERATIONS</p> <p>3.1 Overview</p>	<p>The Applicants note the overview provided by SABIC of its operations, including the Cracker at Wilton, the North Tees Site, the Trans Pennine Ethylene Pipeline</p>

Reference	Written Representation Comment	Applicants' response
	<p>3.1.1 SABIC operates from two primary sites at Wilton International and the North Tees Site. These facilities are linked together via pipeline corridors known as Link Line Corridors.</p> <p>3.1.2 In addition SABIC operates two cross-country pipelines: the Trans-Pennine Ethylene Pipeline and the Wilton to Grangemouth Ethylene Pipeline which form part of the national ethylene production and distribution network.</p> <p>3.1.3 This Application affects the Trans-Pennine Ethylene Pipeline.</p> <p>3.2 Wilton International</p> <p>3.2.1 Wilton International is an industrial area between Eston and Redar in North Yorkshire bounded by the A174 to the south, the A1053 Greystone Road to the west, the A1085 and the Mains Dike to the east.</p> <p>3.2.2 SABIC operates a facility at Wilton International, known as the Cracker, which is used to manufacture ethylene.</p> <p>3.3 North Tees Site</p> <p>3.3.1 The North Tees Site is situated at Seal Sands on the north bank of the River Tees.</p> <p>3.3.2 It is the site of substantial storage, distribution and shipping services including three shipping terminals. Ethane is imported into the North Tees Site via the River Tees and, once processed by the Cracker, ethylene is exported.</p> <p>3.4 Pipelines: TPEP and WGEP</p> <p>3.4.1 National Ethylene Pipeline Network</p> <p>(a) The UK's ethylene production relies on only three crackers: SABIC's Cracker at Wilton, INEOS' at Grangemouth and ExxonMobil's at Mossmorran.</p> <p>(b) These three crackers are linked together and linked to various ethylene consumers across Grangemouth, Wilton,</p>	<p>(TPEP), and the Wilton to Grangemouth Ethylene Pipeline (WGEP), as well as the broader national ethylene network.</p> <p>The Applicants acknowledge SABIC's concerns regarding the national importance of the ethylene production and distribution system and its position that robust protections are required for the TPEP.</p> <p>The Applicants confirm that they have been engaging with SABIC to understand the nature of its assets and operations and to develop bespoke protective provisions, which reflect the interactions between the Transmission Assets and SABIC's assets. As set out in the Land Rights Tracker (REP1-065), the Applicants updated Part 3 of Schedule 10 of the draft Development Consent Order (DCO) (REP1-008) at Deadline 1 to reflect the fact that these protective provisions are for the protection of SABIC.</p> <p>The Applicants will continue to work with SABIC to develop and agree suitable protective provisions for inclusion in the draft DCO (C1/F04), with a view to ensuring appropriate safeguards for SABIC's infrastructure while enabling delivery of the Transmission Assets.</p>

Reference	Written Representation Comment	Applicants' response
	<p>Stanlow, Runcorn, Carrington and Saltend (Hull) via a series of interconnected pipelines</p> <p>(c) A UK Onshore Pipeline Operators' Association document, providing some information about this system is copied at Annex 1 in order to aid the ExA's understanding of SABIC's operations and the national scale of the ethylene circuit. This document is a little out of date, but provides helpful background information.</p> <p>3.4.2 SABIC's National Operations</p> <p>(a) SABIC's operations include two major pipelines:</p> <p>(i) the Trans Pennine Ethylene Pipeline (TPEP); and</p> <p>(ii) the Wilton to Grangemouth Ethylene Pipeline (WGEP).</p> <p>(b) The TPEP and WGEP should be properly understood as two links in the larger national ethylene pipeline production and supply network. This provides a critical link between SABIC's operations on Teesside and the other two UK ethylene Crackers, and supply routes to end-users of ethylene.</p> <p>(c) SABIC's own operations are therefore fundamentally connected with other manufacturers of ethylene. A diversion of SABIC's apparatus may have significant effects across all three operations.</p> <p>(d) The Examining Authority is asked to keep firmly in mind that these three facilities – Wilton, Grangemouth and Mossmorran – comprise the totality of the UK's ethylene manufacturing industry. The protection of SABIC's facilities and apparatus from compulsory acquisition is therefore important not just as a protection for SABIC, but also for the protection of INEOS and Exxonmobil whose businesses utilise the TPEP to supply customers, and therefore the future of the UK's ethylene manufacturing industry.</p> <p>(e) In short, any operational problems experienced by SABIC on Teesside as a result of the authorised development would</p>	

Reference	Written Representation Comment	Applicants' response
	<p>be likely to cause operational problems to the ethylene production and distribution system at a national level.</p> <p>3.4.3 TPEP</p> <p>(a) The TPEP is a high pressure buried pipeline through which ethylene manufactured at the Cracker at Wilton is transported to Runcorn for use by Vynova. It can also be used to transport ethylene manufactured at Grangemouth (where INEOS has a cracker) and Mossmorran (where ExxonMobil has a cracker).</p> <p>(b) As a major accident hazard pipeline the TPEP is likely to present engineering challenges to the proposed development. Development in the vicinity of the TPEP could present serious operational difficulties to SABIC and would not usually be allowed.</p> <p>(c) The potentially nationally significant serious detriment to the UK ethylene production and distribution system – and to end users of ethylene – is a factor which should be borne clearly in mind by the Examining Authority when considering which version of the protective provisions to include in their final recommended Order.</p> <p>(d) In particular, it is only right that the highest and most rigorous standards are applied in the Order to make sure that compulsory acquisition powers are only used when there is no other option.</p>	
REP1-195 195.3	<p>4. THE OPERATIONAL AND SAFETY CONTEXT OF SABIC'S BUSINESS</p> <p>4.1 COMAH</p> <p>4.1.1 SABIC's operations at Wilton and North Tees Sites fall within the ambit of the Control of Major Accident Hazards Regulations 2015 (COMAH), whilst the WGEP and TPEP fall under the Pipelines Safety Regulations 1996 (PSR). The TPEP is a major accident hazard pipeline (MAHP) under PSR.</p>	<p>The Applicants note the detailed information provided by SABIC regarding its regulatory obligations under the Control of Major Accident Hazards Regulations 2015 and Pipelines Safety Regulations 1996, the designation of the TPEP as a Major Accident Hazard Pipeline and the operational and safety context of SABIC's business.</p> <p>The Applicants acknowledge the importance of ensuring that the TPEP and associated assets are protected during the construction and operation of the Transmission Assets.</p>

Reference	Written Representation Comment	Applicants' response
	<p>4.1.2 Both COMAH and PSR place SABIC under a duty to take all necessary measures to prevent major accidents involving dangerous substances, and to limit the consequences to people and the environment of any major accidents which do occur.</p> <p>4.2 PSR</p> <p>4.2.1 Under regulation 12 of the Pipelines Safety Regulations 1996 (PSR) SABIC as operator of the TPEP must ensure that no fluid is conveyed in a pipeline unless adequate arrangements have been made for dealing with an accidental loss of fluid from, discovery of a defect in or damage to or other emergency affecting the pipeline.</p> <p>4.2.2 Regulation 23 of the PSR places a duty on SABIC as pipeline operator to prepare a major accident prevention document (MAPD). In respect of any health and safety arrangements or procedures described in the MAPD, SABIC must "ensure that those arrangements or procedures are followed". Protective provisions are required for SABIC to ensure that it is able to continue to comply with this duty.</p> <p>4.2.3 Regulation 25 PSR also places a duty on the local authority to prepare an emergency plan in respect of MAHPs.</p> <p>4.2.4 Regulation 15 of PSR provides that no person should cause damage to a pipeline and is aimed at third parties carrying out work around pipelines.</p> <p>4.2.5 Because it is an underground pipeline the TPEP is protected by a coating as well as cathodic protection which can be affected by electrical interference.</p> <p>4.2.6 When planning any new works in close proximity to the pipelines, SABIC requires as much advance notice as possible, so that they can agree safe working conditions and ensure that they comply with their duties. SABIC requires that it is notified of any works within 50 metres either side of the pipeline. Cases</p>	<p>The Applicants confirm that the protective provisions at Part 3 of Schedule 10 of the draft DCO (C1/F04) include provisions for working methods, appropriate notice periods and ongoing engagement with SABIC as operator of the TPEP, as well as clear restrictions and safeguards in relation to the exercise of such powers in respect of protected land and pipelines.</p> <p>The Applicants will continue to engage with SABIC with regards to bespoke amendments to address SABIC's specific concerns.</p>

Reference	Written Representation Comment	Applicants' response
	<p>where it is not notified are pipeline infringements and are considered to be a "near miss".</p> <p>4.2.7 It follows that protective provisions are needed so that SABIC can approve works details and also to ensure that the Applicant monitors for damage during the works and that both parties are able to discharge their duties under the PSR.</p> <p>4.3 Diversion</p> <p>4.3.1 It is important to understand the technical and engineering difficulties of carrying out any works which might require the diversion of even a short section of the TPEP.</p> <p>4.3.2 The TPEP is designed to transmit ethylene directly and swiftly over a long distance. Although it is periodically joined to other links and spurs to Holford and Carrington, those links are infrequent.</p> <p>4.3.3 Equally the design of the TPEP does not incorporate valve chambers at short intervals which would allow parts of the pipeline to be isolated so that work can be carried out. This means that in the event that the undertaker sought to divert the pipeline it would be likely that SABIC would have to isolate a section of the TPEP over 10 miles in length. This section would then need to be purged of inventory before any work could be carried out.</p> <p>4.3.4 SABIC estimates that such works would be likely to take 5-6 weeks to complete, and that its losses would run into the millions of pounds during such an interruption.</p> <p>4.3.5 In addition, such works would cut off supply to the Runcorn site affecting the manufacturing processes which take place there. The Runcorn site includes a facility for manufacturing chlorine operated by Runcorn MPC Limited (a joint venture between INEOS Inovyn and Vynova). Some of this chlorine is supplied to a second plant, operated by Vynova,</p>	

Reference	Written Representation Comment	Applicants' response
	<p>which manufactures ethylene dichloride (EDC): it is this plant which uses the ethylene from the TPEP.</p> <p>4.3.6 SABIC cannot comment in any detail on the scale of operational difficulties or losses that would be suffered by the businesses operating from Runcorn as a result of an interruption to supply from the TPEP. However logically the following concerns need to be considered:</p> <p>(a) An interruption in ethylene supply to Vynova would be likely to affect or prevent the production of EDC at that plant.</p> <p>(b) If and to the extent that EDC is not being manufactured, that might also impact the production of the chlorine use to supply that plant.</p> <p>(c) This might impact on the supply of the chlorine used elsewhere in industry and/or public life, as it is understood that not all of the chlorine produced is used to manufacture EDC.</p> <p>(d) SABIC understands that Runcorn is the only large-scale chlorine manufacturing site in the UK.</p> <p>(e) Given the scale of operations at Runcorn, it is likely that their losses are also likely to be very significant and run into millions if not tens of millions of pounds.</p> <p>4.3.7 It is therefore difficult to predict the consequences of an interruption to ethylene supply across the chemical sector.</p> <p>4.3.8 These effects would be difficult to minimise or mitigate. There may potentially be a technical work-around using the WGEP to transport ethylene to Grangemouth and then the North West Ethylene Pipeline (NWEP) to transport ethylene down to Runcorn, however the NWEP is not a SABIC asset and is not under SABIC's control and it is far from guaranteed that this solution would be available.</p>	

Reference	Written Representation Comment	Applicants' response
	4.3.9 For this reason, SABIC is seeking to impose strong controls in the protective provisions against the use of powers of compulsory acquisition under the Order.	
REP1-195 195.4	<p>4.4 Split Ownership</p> <p>4.4.1 One important feature of SABIC's operations is that:</p> <p>(a) The apparatus is operated by one group company, SABIC UK Petrochemicals Limited; but</p> <p>(b) The inventory (ie the contents of the pipelines) is owned by a different group company (SABIC Petrochemicals BV).</p> <p>4.4.2 This arrangement reflects the international, transcontinental nature of SABIC's ethylene production and supply business, a feature which is not present in the same way in the domestic operations of, say, National Grid Electricity Transmission Plc or National Gas Transmission.</p> <p>4.4.3 There is therefore a split of ownership between SABIC UK Petrochemicals Limited which owns the fixed, physical, apparatus in the UK, and SABIC Petrochemicals BV, who owns and continues to own the inventory as it passes across international borders to be processed and distributed or, in this case, is distributed through the TPEP.</p> <p>4.4.4 It is SABIC Petrochemicals BV who would be likely to suffer consequential loss as a result of the authorised development.</p> <p>4.4.5 It is a well-established principle that protective provisions have a role in protecting the financial position of the person affected, because otherwise the authorised development could cause a third party to suffer significant financial losses, thereby putting their future operations at risk.</p> <p>4.4.6 SABIC's protective provisions therefore provide for the benefit of the indemnity and the insurance policy to include SABIC Petrochemicals BV. This is to place SABIC and the</p>	<p>The Applicants note SABIC's position regarding the split ownership of its assets and inventory, and its request that indemnity and insurance provisions reflect this arrangement. The Applicants are engaging with SABIC on these matters as part of the discussions on the protective provisions.</p>

Reference	Written Representation Comment	Applicants' response
	undertaker in the same position they would be in if SABIC's business was not an international one.	
REP1-195 195.5	<p>4.5 Employment</p> <p>4.5.1 SABIC is a major employer in the UK, employing approximately 400 full time employees (with an additional 400 contractors), and 31,000 persons globally.¹</p> <p>4.6 Financial Benefits and Investment</p> <p>4.6.1 SABIC's operations contribute £400 million to the economy in the North East of England.</p> <p>4.6.2 In recent years SABIC has made significant investments at Wilton International, including around £250 million on its Low Density Polyethylene plant and around £850 million on a fuel conversion project for the Cracker.</p> <p>4.6.3 As such it is very strongly in the public interest to protect SABIC's interests and assets in the areas of the proposed DCO Application. Businesses and investors into the UK need to know that their established operations will be properly protected and that they can invest in them with confidence.</p>	The Applicants are committed to continued engagement with SABIC to ensure its concerns are addressed and that the Transmission Assets can proceed in a way that minimises impacts on existing businesses and infrastructure.
REP1-195 195.6	<p>5. SABIC'S ADDITIONAL SITE SPECIFIC CONCERNS</p> <p>5.1 Laying of Underground Cables</p> <p>5.1.1 Schedule 1 of the dDCO describes Works 25A and 25B, which cross the TPEP as works to install cable circuits and associated cable ducts either by open cut trenching or trenchless installation.</p> <p>5.1.2 SABIC has a number of safety requirements where works are undertaken in the vicinity of the TPEP, including relating to undertaking excavations, piling, backfilling, compaction, horizontal directional drilling and superintendence. It also prohibits certain activities such as storage, lifting and hydraulic testing over the TPEP.</p>	<p>The Applicants note the detailed safety and engineering requirements outlined by SABIC in relation to works near the TPEP.</p> <p>The Applicants confirm that protective provisions for the protection of pipelines, including the TPEP, are already included at Part 3 of Schedule 10 of the draft DCO (C1/F04).</p> <p>These provisions require the Applicant to adopt appropriate working methods, provide advance notice of works, engage with SABIC and implement safeguards for pipeline infrastructure during construction. The Applicants are reviewing the additional draft protective provisions submitted by SABIC and will continue to engage with SABIC with regards to bespoke amendments to address SABIC's specific concerns.</p>

Reference	Written Representation Comment	Applicants' response
	<p>5.1.3 It also requires that drawings of underground services are approved. A minimum distance of 300 mm must be maintained and the angle of crossing must not be less than 60 degrees. Concrete raft protection must be provide above the pipeline (or above and below the pipeline if the new apparatus is to be installed under it).</p> <p>5.1.4 The UK's Institution of Gas Engineers (IGEM) guidance (IGEM/TD/1) should be adhered to. This recommends minimum separation of 300cm (3,000mm) for parallel pipes (or even greater, dependent on soil-type and pipeline pressure), and 60cm (600mm) for vertical separation.</p> <p>5.1.5 The TPEP is protected by a cathodic protection system and extreme care must be exercised during all construction work to avoid damage to cables, connections and test stations. As the proposed cables will carry high voltage electricity, interaction tests will have to be carried out to ensure the TPEP cathodic protection system is not impacted.</p> <p>5.1.6 SABIC would also be concerned about construction traffic passing over the TPEP otherwise than on public highways. SABIC would need to approve temporary crossing points and relevant protection.</p>	
REP1-195 195.7	<p>5.2 Permanent Environmental Mitigation Works</p> <p>5.2.1 The dDCO provides for Works Nos. 49A and 49B as "permanent environmental mitigation works" over a 30 hectare site. The works are identified in the Outline Ecological Management Plan ("OEMP") as "Permanent mitigation area south of Newton-with-Scales".</p> <p>5.2.2 SABIC has two concerns about the scheme in this location:</p> <p>(a) The proposed wader scrapes (shallow depressions created in fields to benefit wading birds). The making of these depressions by the Application would be of concern to SABIC if</p>	<p>The Applicants note SABIC's concerns regarding the proposed permanent environmental mitigation works in the vicinity of the TPEP. As noted in the Applicants' response to SABIC's relevant representation (Table 2.103 of PDA-007), the detailed design of the measures at the permanent mitigation area south of Newton-with Scales will take into account SABICs TPEP infrastructure. Further, the Applicants refer to row 1917.5 in Table 2.103 of PDA-007, which sets out how the draft DCO (C1/F04) controls the Applicants' compulsory acquisition and other powers in relation to apparatus or land owned by SABIC.</p> <p>As outlined above, the Applicants confirm that the protective provisions for the protection of pipelines, including the TPEP, are already included at Part 3 of Schedule 10 of the draft DCO (C1/F04). These provisions ensure the safety and</p>

Reference	Written Representation Comment	Applicants' response
	<p>they are in the vicinity of the TPEP, as they would constitute excavations which could damage the TPEP. Additionally, any loss of cover above a pipeline increases the risk of third party interference with it.</p> <p>(b) The thickening of existing hedgerows and gapping of hedgerows with new native planting. SABIC maintains certain rules in relation to planting of trees and shrubs in the vicinity of the TPEP, as their roots would be likely to cause damage. For example, hawthorn should be planted not less than 3 metres away from the TPEP.</p> <p>5.2.3 In light of these difficulties and constraints, SABIC does not believe that it is appropriate for the scheme to use this land and is very concerned that the Applicant has not given due consideration to possible alternatives.</p>	<p>integrity of pipeline infrastructure during the delivery of all Transmission Assets works, including environmental mitigation measures.</p> <p>The Applicants are reviewing the additional draft protective provisions submitted by SABIC and will continue to engage with SABIC to address its specific concerns, while ensuring the delivery of the Transmission Assets, including the environmental mitigation works, in accordance with detailed Ecological Management Plan(s), which will be informed by the Outline Ecological Management Plan (APP-212).</p>
REP1-195 195.8	<p>6. SABIC'S GENERAL CONCERNS</p> <p>6.1 DCO Powers</p> <p>6.1.1 SABIC is concerned about powers of compulsory acquisition, in particular the right to take exclusive temporary possession and to create rights which are not compatible with SABIC's existing rights (including the power to override SABIC's existing rights).</p> <p>6.1.2 The Applicant has not confirmed whether it needs to extinguish SABIC's rights or divert the TPEP. This creates an unacceptable level of uncertainty for SABIC in terms of the project. If the Applicant is unable to say that it needs to extinguish SABIC's rights then it is difficult to see how they can satisfy the Secretary of State that the powers being sought are no more than is reasonably required for the purposes of the development.</p>	<p>The Applicants acknowledge SABIC's position regarding the scope of powers sought. The Applicants are not seeking to extinguish or divert the TPEP. Any rights sought in relation to SABIC's land or apparatus would be governed by protective provisions in SABIC's favour, as set out in the protective provisions in Part 3 of Schedule 10 to the draft DCO (C1/F04). The Applicants continue to engage with SABIC to finalise the drafting.</p>
REP1-195 195.9	<p>6.2 Article 33</p>	<p>The Applicants note SABIC's support for the principle of guarantees and securities in Article 33 of the draft DCO (C1/F04) and its concerns regarding the process for assessing the adequacy of security and compensation liabilities. The Applicants</p>

Reference	Written Representation Comment	Applicants' response
	<p>6.2.1 SABIC supports the principle of guarantees and securities being provided before compulsory acquisition takes place, as contained in Article 33 of the dDCO, however the Applicant has not made adequate provision in the article to ensure that the Secretary of State is able to determine if the level of security is adequate.</p> <p>6.2.2 SABIC is particularly concerned about the incidental suspension or extinguishment of an inconsistent right under Article 22 or 29 and how the effect of the extinguishment or suspension of its rights would be taken into account under to ensure that an adequate security is obtained. Article 33 does not provide a mechanism under which information is to be provided to the Secretary of State to allow them to make an objective assessment regarding the level of compensation to be provided.</p> <p>6.2.3 In the absence of protective provisions to the contrary, the only cogent way to make this assessment would be to assume that the Applicant will exercise such powers to their fullest extent to extinguish SABIC's rights and remove SABIC's apparatus such as to prevent its continued operations and to place this outcome into the balance against the benefits of the scheme.</p> <p>6.2.4 It is unclear whether the Applicant has taken into account this "worst case" assessment in its Funding Statement [APP-008]. However its estimate of £19,967,103 in paragraph 1.7.1.3 would not seem to take into account compensation payable to SABIC in the event of the extinguishment of its rights in respect of the TPEP.</p> <p>6.2.5 Although the quantum of compensation is not a matter for the ExA, the proper and adequate assessment of potential compensation in the context of the Funding Statement and the adequacy and securing of the funding to sufficiently meet that</p>	<p>confirm that Article 33 provides protection for affected parties by ensuring that Morgan OWL and Morecambe OWL cannot exercise key powers of compulsory acquisition, including those under Article 22 (compulsory acquisition of rights) and Article 29 (temporary use of land for carrying out the authorised project), unless and until the Secretary of State has approved the amount of any guarantee or alternative form of security, or confirmed that no such security is required. This approval process enables the Secretary of State to make an informed and objective assessment of the adequacy of the security, based on financial information provided by the Applicants.</p> <p>As confirmed in the Property Cost Estimates (PCE) at Annexes 1 and 2 of the Funding Statement (APP-009 and APP-010) costs for utility apparatus such as pipelines (which would include the TPEP) are not included in the figures referred to by SABIC.</p> <p>Compensation for impacts on SABIC's assets, including any extinguishment or suspension of rights, would therefore be determined under the Protective Provisions at Part 3 of Schedule 10 of the draft DCO (C1/F04). These provisions prevent the Applicants from exercising powers under Articles 22 or 29 in relation to the SABIC's assets (including the TPEP) without SABIC's consent, agreement via arbitration, or deemed consent mechanisms.</p>

Reference	Written Representation Comment	Applicants' response
	liability, are (in the case of a private company) matters which the ExA should properly consider.	
REP1-195 195.10	<p>6.3 Article 16</p> <p>6.3.1 SABIC is concerned about the traffic regulation powers provided in Article 13 of the dDCO. These relate to streets, which includes but is not limited to highways and could include access routes to SABIC's assets.</p> <p>6.3.2 The power to regulate traffic under Article does not include a geographical limit, and is not limited to the specific roads identified on the street works plan. This seems too broad for a project of this nature.</p>	<p>The Applicants acknowledge SABIC's concerns regarding the scope of Article 13. While Article 13 provides a general power to temporarily restrict or manage streets, its exercise over any street not listed in Schedules 4A and 4B of the draft DCO (C1/F04) is subject to the consent of the relevant street authority (which may impose reasonable conditions) under Article 13(6)(b) of the draft DCO (C1/F04). This safeguard ensures that the power to restrict or manage streets is controlled and appropriately limited.</p> <p>In addition, the protective provisions at Part 3 of Schedule 10 of the draft DCO (C1/F04) provide strong safeguards for access to pipelines and protected land, including specific requirements to consult with SABIC and others on construction access plans, manage construction to minimise impacts on access, and ensure continued access to protected assets. The Applicants consider these provisions ensure that access to SABIC's assets is properly protected.</p>
REP1-195 195.11	<p>7. PROTECTIVE PROVISIONS</p> <p>7.1 SABIC does consider that its concerns can be allayed by protective provisions. However such protections must be both suitable and adequate.</p> <p>7.2 SABIC provided the Applicant with its standard protective provisions for its pipelines on 1 April 2025. These are contained at Annex 2 of this document.</p> <p>7.3 At Deadline 1 SABIC awaits the Applicant's comments on this document and the extent of any agreement and disagreement between the parties is not known.</p> <p>7.4 SABIC will engage with the Examination to seek to ensure the protect its position in particular in relation to the following key concerns:</p>	<p>As set out above, the Applicants confirm that Part 3 of Schedule 10 of the draft DCO (C1/F04) contains protective provisions for the benefit of SABIC's assets, including the TPEP. These provisions address matters such as working methods, access, safety measures and restrictions on the exercise of powers including compulsory acquisition, temporary possession and extinguishment of rights.</p> <p>The Applicants note that SABIC has provided its standard protective provisions for pipelines and confirm that these are being reviewed. The Applicants will continue to engage with SABIC with a view to agreeing bespoke protective provisions that are suitable and adequate to address SABIC's concerns prior to the close of examination.</p>

Reference	Written Representation Comment	Applicants' response
	<p>7.4.1 To adequately protect its assets from the authorised works, compulsory acquisition, temporary possession and diversion.</p> <p>7.4.2 To ensure that suitable and adequate indemnity and insurance provisions are included in the Order.</p> <p>7.4.3 To ensure that SABIC Petrochemicals BV benefits from the protection of that indemnity and those insurance provisions.</p>	

2.23 The Corporation of Trinity House of Deptford Strond

Table 2.20: REP1-209 –The Corporation of Trinity House of Deptford Strond

Reference	Written Representation Comment	Applicants' response
REP1-209 209.1	<p>Morgan and Morecambe Offshore Wind Farms Transmission Assets</p> <p>Dear Sir / Madam</p> <p>Further to the application relating to the Morgan and Morecambe Offshore Wind Farms Transmission Assets, we wish to provide our further responses as follows in relation to Deadline 1.</p> <p>Comments to the draft Development Consent Order (DCO) (APP-005)</p> <p><u>Arbitration</u></p> <p>With regard to 'Arbitration', as provided for in Part 6, s.46 of the draft DCO, Trinity House requests that the wording be amended to reflect the 'Savings Provisions for Trinity House' clause as follows:</p> <p><i>"(1) Subject to article 38 (saving provisions for Trinity House), any difference under any provision of this Order, unless otherwise provided for, is to be referred to and settled in arbitration in accordance with the rules at Schedule 13 (arbitration rules) of this Order, by a single arbitrator to be agreed upon by the parties, within 14 days of receipt of the notice of arbitration, or if the parties fail to agree within the time period stipulated, to be appointed on application of either party (after giving written notice to the other) by the Secretary of State.</i></p> <p><i>(2) For the avoidance of doubt, any matter for which the consent or approval of the Secretary of State or the Marine</i></p>	<p>The Applicants have amended Article 46 of the draft DCO (C1/F04) to include the words '<i>Subject to article 38 (saving provisions for Trinity House)</i>', which will be provided at Deadline 2.</p>

Reference	Written Representation Comment	Applicants' response
	<i>Management Organisation is required under any provision of this Order, is not subject to arbitration."</i>	
REP1-209 209.2	<p><u>Marine Licences One and Two Conditions</u></p> <p>With regards to the conditions for Marine Licences One and Two, as provided for by Schedule 14, Part 2, and Schedule 15, Part 2, Trinity House highlights the reference to condition 14 at s.18(b), which should read as a reference to condition 15. Accordingly, Trinity House requests the amendment of this sub-clause to read as follows:</p> <p>"(b) an aids to navigation management plan to be agreed in writing by the MMO following appropriate consultation with Trinity House specifying how the undertaker will ensure compliance with condition 15 from the commencement of construction of the authorised scheme to the completion of decommissioning of the authorised scheme;"</p> <p>Please address all correspondence regarding this matter to me at [redacted]@trinityhouse.co.uk, CC'ing in the Navigation Services Manager, Mr. Stephen Vanstone, at [redacted]@trinityhouse.co.uk.</p> <p>Yours faithfully, [redacted] Jack Walker Legal Executive</p>	<p>The Applicants have made this cross-reference correction so that Condition 18(b) of Schedules 15 of the draft DCO (C1/F04) now refers to Condition 15 rather than Condition 14, which will be provided in an updated draft DCO/DMLs at Deadline 2.</p>

2.24 The Wildlife Trust for Lancashire, Manchester and North Merseyside

The Applicants' response to the WR of The Wildlife Trust for Lancashire, Manchester and North Merseyside (REP1-210) is provided in Annex 3.5 to Applicants' Response to WRs from Statutory Consultees: The Wildlife Trust for Lancashire, Manchester and North Merseyside (Document Reference: S_D2_3.5).

2.25 Mooir Vannin Offshore Windfarm Limited

Table 2.21: REP1-224–Mooir Vannin Offshore Windfarm Limited

Reference	Written Representation Comment	Applicants' response
REP1-224 224.1	<p>1. Written representation</p> <p>1.1 This written representation is provided in accordance with Deadline 1 of the examination timetable for the application made by Morgan Offshore Wind Limited and Morecambe Offshore Wind Limited (the “Applicants”) for an order granting development consent for the Morgan and Morecambe Offshore Wind Farms Transmission Assets (“Project”).</p> <p>1.2 We represent Mooir Vannin Offshore Windfarm Limited (“Mooir Vannin”), which filed a relevant representation (accepted as an additional submission) [AS-063] in respect of the Project.</p> <p>1.3 As outlined in its relevant representation, Mooir Vannin is the developer of the Mooir Vannin Offshore Wind Farm (the “MVOWF”), a proposed fixed-foundation offshore wind farm with an indicative capacity of c. 1.4 GW within the Isle of Mann’s jurisdiction. MVOWF has secured a grid connection at Penwortham substation and submitted an application for Marine Infrastructure Consent for the Mooir Vannin Generation Project in March 2025.</p> <p>1.4 The transmission infrastructure required for MVOWF, located within England’s jurisdiction (the East Irish Sea Transmission Project (the “MV transmission project”)), is being developed by Orsted East Irish Sea Transmission Limited (“OEIST”). The MV transmission project has been awarded a section 35 Direction under the Planning Act 2008 and an application will be made in due course for development consent for the MV transmission project.</p>	<p>The Applicants note the response and acknowledge the potential for proximity between Mooir Vannin Offshore WF, the MV transmission project and the Transmission Assets.</p> <p>The Mooir Vannin Offshore WF and the Mooir Vannin transmission project (the latter also known as the East Irish Sea Transmission Project) have been identified in Table A.9 of Volume 1, Annex 5.5: Cumulative Screening Matrix and Location Plan of the Environmental Statement (REP1-020). Both projects have been assessed in the cumulative effects assessment in specific topic chapters, where relevant. There is, however, limited information in the public domain about the MV transmission project and therefore the potential for interactions with the Transmission Assets are at this stage largely unknown. The Applicants have held preliminary discussions with OEIST and will keep the position under review, engaging further as more information on its project becomes available.</p>

Reference	Written Representation Comment	Applicants' response
	<p>1.5 OEIST is an interested party to this proceeding and has submitted a relevant representation [AS-064] and has also submitted a written representation.</p> <p>1.6 The location of MVOWF is displayed on Figure 9.4, Chapter 9 of the Environmental Statement (the "ES") [APP-066]. The MV transmission project is not displayed on this figure but, as the Applicants have noted in their response to relevant representations [PDA-007], it has been screened into the cumulative effects assessment for the Project.</p> <p>1.7 Due to the proximity of the Project to MVOWF and the MV transmission project (upon which the MVOWF will rely) Mooir Vannin considers close engagement is required from the Applicants regarding the overlap between the parties' interests.</p> <p>1.8 Mooir Vannin's concerns are captured in the written representation submitted by OEIST. Mooir Vannin supports the solutions sought by OEIST in its written representation.</p>	

2.26 Orsted East Irish Sea Transmission Limited

Table 2.22: REP1-225 –Orsted East Irish Sea Transmission Limited

Reference	Written Representation Comment	Applicants' response
REP1-225 225.1	<p>1. Introduction</p> <p>1.1 This written representation is provided in accordance with Deadline 1 of the examination timetable for the application made by Morgan Offshore Wind Limited and Morecambe Offshore Wind Limited (the “Applicants”) for an order granting development consent for the Morgan and Morecambe Offshore Wind Farms Transmission Assets (“Project”).</p> <p>1.2 We represent Orsted East Irish Sea Transmission Limited (“OEIST”), which filed a relevant representation (accepted as an additional submission) [AS-064] in respect of the Project.</p> <p>1.3 As outlined in its relevant representation, OEIST is the developer of the East Irish Sea Transmission Project (the “MV transmission project”), which is the proposed transmission infrastructure located within England and English waters required to connect the Mooir Vannin Offshore Wind Farm (“MVOWF”) to the UK grid. A grid connection has been secured for MVOWF and an application for Marine Infrastructure Consent for the Mooir Vannin Generation Project was submitted in March 2025.</p> <p>1.4 The MV transmission project has been awarded a section 35 direction under the Planning Act 2008 and an application will be made for a Development Consent Order for an Onshore Substation, Electricity Balancing Infrastructure, offshore booster stations, offshore and onshore cabling and associated development as required.</p> <p>1.5 The location of MVOWF is displayed on Figure 9.4, Chapter 9 of the Environmental Statement (the “ES”) [APP-066]. The MV transmission project is not displayed on this</p>	<p>The Applicants note the response and acknowledge the potential for proximity between Mooir Vannin Offshore Wind Farm (MVOWF), the Mooir Vannin (MV) transmission project and the Transmission Assets. Further comments on the specific points raised by OEIST are provided below.</p> <p>As noted in the Applicants’ Statement of Commonality (REP1-047), given the early stage of the East Irish Sea Transmission project there is not sufficient detail to enable the parties to prepare an SOCG, however, the Applicants will keep this under review.</p>

Reference	Written Representation Comment	Applicants' response
	<p>figure but, as the Applicants have noted in their response to relevant representations [PDA-007], it has been screened into the cumulative effects assessment for the Project.</p> <p>1.6 Due to the proximity of the Project to the MV transmission project, OEIST seeks close engagement with the Applicants in respect of the overlap between their developments. In particular, OEIST has concerns regarding the crossing of offshore transmission infrastructure, potential onshore crossings, the extent of land take in the vicinity of the River Ribble and access to the Penwortham substation. Both projects have secured grid connections to the Penwortham substation and will require access to construct and maintain the required grid connections.</p> <p>1.7 In light of the above, and the issues raised in this representation, OEIST considers a statement of common ground with the Applicants may be helpful as matters progress.</p>	
REP1-225 225.2	<p>2. Transmission crossings</p> <p>2.1 OEIST considers there to be potential for both the offshore and onshore transmission cables required for the MV transmission project and the Project to overlap.</p> <p>2.2 OEIST notes the Applicants' comment in its response to relevant representations [PDA-007] that the date for MVOWF's connection to the grid is 2037 and therefore the Applicants consider any overlap between construction of the MV transmission project and the Project is likely to be limited.</p> <p>2.3 However, considerable work is being undertaken to develop MVOWF's grid connection and the routeing options for the MV transmission project are under consideration. The results of this work indicate it is highly probable that the grid connection date will be brought forward and therefore it is possible the construction of the two developments will overlap. As such, the Applicants cannot rely on there being limited</p>	<p>The Applicants acknowledge the potential for the Transmission Assets to interact with MVOWF and the MV transmission project noting that both projects were screened into the Applicants' cumulative effect assessment (CEA) matrix (REP1-020) and considered within the relevant environmental statement topic chapters cumulative assessments, where appropriate.</p> <p>Based on information in the public domain, the Transmission Entry Capacity (TEC) Register stipulates a connection for the Isle of Man Offshore Windfarm (Moor Vannin Offshore Wind Farm Limited) will be provided by National Grid on 30 October 2037. The Applicants cannot speculate on whether it is possible (or indeed highly probable or not) that the grid connection date can be brought forward to increase any potential interactions and do not consider it appropriate for the CEA to be based upon speculative dates.</p> <p>The Applicants will continue to engage with the East Irish Sea Transmission project and consider this engagement will be more productive following publication of the East Irish Sea Transmission project Scoping Report, and further consultation</p>

Reference	Written Representation Comment	Applicants' response
	<p>overlap between the developments in carrying out their assessments of the Project – such an approach would not be safe or reasonable.</p> <p>2.4 It is not clear how the Applicants plan to manage this likely overlap of the assets. OEIST consider engagement from the Applicants is necessary in order to reach agreement regarding this matter. If such engagement is not forthcoming, or this matter is not able to be addressed by agreement, OEIST will seek that protective provisions are incorporated in the development consent order to ensure its interests are adequately protected.</p>	<p>and application documents in due course, when there is a greater level of detail on possible interactions available.</p> <p>Given the early stage of the OEIST project the Applicants do not consider it either necessary or appropriate for protective provisions (which are used to protect existing infrastructure or undertakings) to be included within the draft DCO (C1/F04) as any potential interactions are entirely speculative. In the event that consent is granted for the Transmission Assets, it will be for the OEIST DCO to include such provisions in relation to the consented works.</p>
REP1-225 225.3	<p>3. Grid connection at Penwortham</p> <p>3.1 The MV transmission project and the Project will both connect to the Penwortham substation. Evidently, both projects will require access to construct connections to the substation. Both developers will require land rights for the installation of cables and ancillary rights to facilitate the construction and maintenance of the assets.</p> <p>3.2 The Applicants are seeking to compulsorily acquire extensive property rights (both permanent and temporary) surrounding the Penwortham substation. These are illustrated on Land Plan – Sheet 18 [AS-019].</p> <p>3.3 As outlined in the statement of reasons [AS-010], these rights are required to enable access to the cable corridor, the construction, operation and decommissioning of underground cables and ancillary infrastructure and to connect the cables to the National Grid substation. These rights apply throughout the construction, operation, maintenance and decommissioning phases of the Project. As outlined in the draft development consent order [AS-005], the rights sought include the imposition of restrictive covenants which would prevent, among other matters, construction works, excavation and activities</p>	<p>As explained in the Statement of Reasons (REP1-012), the draft DCO (C1/F04) only includes powers to compulsorily acquire the land and rights needed to construct, operate and decommission the Transmission Assets.</p> <p>The Applicants engaged with NGET during the pre-application stage regarding the property rights required to connect the Transmission Assets at Penwortham. The Applicants have also responded separately to the matters raised in the NGET Written Representation (REP1-089), including the protective provisions required to ensure delivery of other planned infrastructure at this location, although the MV transmission project is not mentioned specifically, likely due to its much later connection date in 2037. In any case the Applicants expect that NGET will continue to manage access to the Penwortham substation in the same way as other projects come forward (including any risk of land being sterilised by another project) and the Applicants will collaboratively engage in that forum as required.</p>

Reference	Written Representation Comment	Applicants' response
	<p>which would alter, increase or decrease ground cover or soil levels.</p> <p>3.4 OEIST considers the extent of rights sought surrounding the substation to be excessive and may impede its ability to deliver the MV transmission project. It is acknowledged that the Applicants' broad-brush approach to the acquisition of property rights to enable the Project's grid connection is likely to have arisen from a lack of detail provided by National Grid Electricity Transmission ("NGET") regarding the Project's grid connection. OEIST therefore suggest that NGET should be engaged early in the process to clarify the details of the Project's connection, which would allow for property rights sought by the Applicants to be narrowed to reflect what will be necessary for the Project.</p> <p>3.5 If NGET is unable to provide such detail at this stage, it is suggested that the development consent order will require a mechanism for reducing the extent of rights sought for the grid connection as quickly as possible, to ensure the Project does not impede other developments' access to the Penwortham substation.</p> <p>3.6 Additionally, it is noted that Penwortham and the surrounding area (including the River Ribble) is subject to utilities, agriculture and other land use and environmental constraints. OEIST would like to work with the Applicants (in addition to NGET and the National Grid Energy System Operator) to ensure that the Applicants' works do not create significant challenges or sterilise access to Penwortham for the MV transmission project.</p>	

3 References

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