

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

**Applicants' Response to Public Written Representations**



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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 reviewed each of the Written Representations (WRs) and post hearing submissions received from members of the public.
- 1.1.1.2 Details of the Applicants' response to each of the Written Representations (WRs) and post hearing submissions are set out in the subsequent sections of this document and its annexes.
- 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 In order not to duplicate material and responses that have already been provided to the Examination, the Applicants have cross referred to previous submissions in their responses to Written Representations where those previous submissions address the point being made. Any new points are addressed within this response.
- 1.1.1.5 A number of the WRs responded to in this document have suggested that there is an alternative cable route and that the Point of Interconnection (POI) for the Transmission Assets should have been at, around or via Stanah. The Applicants are aware that their responses at Deadline 1, and in particular Annex 5.2 to the Applicants response to Hearing Action Points: ISH1 6, 8, 9, 19, 26 & 28 (REP1-039), will not have been available before submission of WRs. By way of summary the Applicants note the following:
- The Pol is the "terminating point" (in the language of paragraph 2.2.1 of NPS EN-5) where the projects connect to the National Electricity Transmission System owned by NGET. The Pol for the projects is at the NGET Penwortham substation. The Pol was not selected by the Applicants. It was determined by a separate process which is subject to legal duties and process, and for which NESO (the UK's Electricity System Operator Licensee) is responsible, with input from National Grid Electricity Transmission (NGET) and the Applicants. The Pol was informed by the Holistic Network Design (HND) process led by NESO. A route to Stanah would involve a change to the Pol, which is not a decision within the direct control, statutory function, or expertise of the Applicants (as explained in more detail in Section 3 of REP1-039).
  - The Applicants reiterate that they were engaged in the HND process and carefully considered the Pol proposed before accepting the connection offer, based on a clear and considered view that it represents a suitable and appropriate connection for the Generation Assets (Section 4.2 of REP1-039) which is supported by the NPS and is capable of being delivered sensitively within the host community and environment.

- The Applicants' position, supported by NPS policy, is that it is neither necessary nor appropriate to consider or assess hypothetical projects with alternative Pols as part of the determination of the Transmission Assets application.

1.1.1.6 The Applicants also note the submission from Mr Harrop submitted at Deadline 1 (REP1-117) which provides information Mr Harrop received from National Grid in December 2024 via a Freedom of Information request and which supports the statements made in REP1-037.

## 2 Responses to Written Representations

### 2.1 Alexander Miller Cairns (REP1-100)

**Table 2.1: REP1-100 – Alexander Miller Cairns**

Reference	Written Representation Comment	Applicants' response
REP1-100.01	<p>Concerns arise over the following which I have entered as bullet points:</p> <ul style="list-style-type: none"> <li>- Selection of proposed site. • No alternative sites considered. Stanah would be a shorter, cheaper and less damaging alternative. Which could connect to Penwortham, utilising already existing National Grid 400KV line, with cost savings into the millions, utilising brownfield sites as opposed to greenbelt agricultural land.</li> </ul>	<p>As noted above at section 1.1 Introduction, a number of responses have provided comments on site selection and the assessment of alternatives including suggesting that the Point of Interconnection for the Transmission Assets should be at or via Stanah. The Applicants provided an initial response on site selection and the assessment of alternatives at section 2.31.1 of The Applicants' Response to Relevant Representations Part 1 - Introduction and thematic responses (PDA-005). Following discussions relating to site selection and alternatives at Issue Specific Hearing 1 and in response to a number of the Examining Authority's Hearing Action Points, the Applicants provided a detailed technical response on these matters including explaining why the proposed alternative connection to Stanah a viable alternative route or Point of Interconnection for the Transmission Assets is not. This was provided at Deadline 1 in Annex 5.2 to the Applicants response to Hearing Action Points: ISH1 6, 8, 9, 19, 26 &amp; 28 - Rev F01 (REP1-039). A summary of the position is provided at section 1.1 above.</p>
REP1-100.02	<ul style="list-style-type: none"> <li>• Concerns also arise over extended construction periods, site selection and lack of local community benefits.</li> </ul>	<p>In relation to construction periods the Applicants have provided further consideration of potential construction scenarios in their Rule 9 - ES assessment of Construction Scenarios (AS-070) at Section 1.5 . The Applicants have also clarified in response to Examining Authority's Hearing Action Point ISH1_27 in the Applicants' response to Hearing Action Points due at Deadline 1 - Rev F01 (REP1-037) that construction periods beyond the assessed durations of 36 months for Morgan OWL and 30 months for Morecambe OWL would fall outside the assessed project envelope, meaning such activities would not be permissible under the consent sought by the Applicants.</p> <p>The Applicants have responded to concerns in relation to Consultation in Section 2.2.2 of their Response to Relevant Representations Part 1 - Introduction and thematic</p>

Reference	Written Representation Comment	Applicants' response
		<p>responses (PDA-005) in particular noting that the Acceptance Checklist (s55) (PD-003) where the Planning Inspectorate confirms in relation to adequacy of consultation it "is satisfied that the Applicants have complied with their statutory obligations." The Applicants note this was similarly acknowledged by the Examining Authority (see paragraph 30 of The Applicants' Hearing Summary of the Compulsory Acquisition Hearing 1 (REP1-036)). The Applicants would also note that they have carried out extensive rounds of non-statutory consultation which are detailed within the Applicants' Consultation Report (APP-170).</p> <p>In relation to community benefits, following discussion in Issue Specific Hearing 1 and in response to Examining Authority's Hearing Action Point ISH1_31 the Applicants have updated their Statement of Reasons with information on local community benefits. The Applicants will also be undertaking further engagement on community benefits with local stakeholders as discussed in The Applicants' response to Hearing Action Points due at Deadline 1 - Rev F01 (REP1-037).</p>
REP1-100.03	<ul style="list-style-type: none"> <li>• Insufficient efforts on consultations.</li> </ul>	See response to REP1.100.02 and the Applicants would also note that they have carried out extensive rounds of non-statutory consultation which are detailed within the Applicants' Consultation Report (APP-170).
REP1-100.04	<ul style="list-style-type: none"> <li>• Beach access at St Anne's facing lengthy closures without any mitigation plans in place.</li> </ul>	<p>The Applicants previously addressed concerns relating to beach access in section 2.5 of The Applicants' Response to Relevant Representations Part 1 - Introduction and thematic responses (PDA-005). Following the discussions at the Hearings, and in response to Hearing Action Points, the Applicants provided further detailed technical clarifications in relation to beach access in Annex 5.3 to the Applicants response to Hearing Action Points: ISH1 13, 14, 16, 17 (REP1-040).</p> <p>Further details of the public access to the beach during construction is set out in The Outline Open Space Management Plan which is at Appendix A of the Outline Public Rights of Way (PRoW) Management Plan (AS-048). This sets out the discrete working areas that will be subject to access management during construction works.</p>

Reference	Written Representation Comment	Applicants' response
REP1-100.05	<ul style="list-style-type: none"> <li>Unresolved air safety concerns due to lack of engagement with BAE systems and Blackpool airport.</li> </ul>	<p>The Applicants are in ongoing dialogue with BAE Systems Warton (Aerodrome) as well as the owner and operator of Blackpool Airport and are confident that any concerns on air safety can be satisfactorily addressed.</p>
REP1-100.06	<ul style="list-style-type: none"> <li>Restricted access concerns during the construction phase, with regard to emergency vehicles, creating delays to local residents.</li> </ul>	<p>The Applicants have assessed the potential impact of the Transmission Assets on emergency services in Volume 3, Chapter 7: Traffic and Transport (APP-108) which considers the Transmission Assets traffic in relation to driver delay, severance, non-motorised user delay, fear and intimidation, road safety and abnormal loads.</p> <p>During construction, when the greatest impacts to the considerations on emergency services will be experience, the Applicants highlight that extensive commitments have been made to minimise disruption. The use of trenchless installation techniques, such as Horizontal Directional Drilling (HDD) to minimise disruption to all A, B and Classified roads (with the exception of Leach Lane) and railways proposed to be crossed by the Transmission Assets (see CoT02, Volume 1, Annex 5.3: Commitments Register (F 1.5.3/F03)). This commitment to the use of trenchless techniques is secured via Requirement 8 (Code of Construction Practice) of Schedules 2A and 2B of the draft DCO (REP1-008). With regard to Leach Lane, the Applicants have committed to maintaining access, with works completed on a 'half / half basis' with traffic to be controlled through the use of temporary traffic management, such as traffic signals. The open cut trenching on Leach Lane is not expected to result in any road closures and vehicular access would always be maintained including for emergency services and for buses.</p> <p>The approach to managing highway crossings is outlined in Section 1.10 of the Outline Construction Traffic Management Plan (OCTMP) (J5/F02).</p> <p>Subject to the grant of the DCO, the Applicants would note that the effects of construction traffic and highway works from Transmission Assets would be managed, monitored and controlled through the development of the detailed CTMPs. In compliance with Requirement 9 in Schedules 2A and 2B of the draft DCO (REP1-008), the detailed CTMPs would need to be agreed with the relevant highway authorities. In approving the detailed CTMPs the relevant highway authorities would apply their statutory duties under</p>

Reference	Written Representation Comment	Applicants' response
		the Traffic Management Act, 2004 to ensure the “expeditious movement of traffic on the authority’s road network” which includes emergency services.
REP1-100.07	• Biodiversity concerns persist, with protected bird species inhabiting affected areas of land.	The Applicants refer to their response to Relevant Representations Part 1 - Introduction and thematic responses (PDA-005) Section 2.3.2.4 and 2.12 on Ecology. The Applicants in that document also reconfirm that approximately 68.9 ha of agricultural land will be subject to permanent land take for biodiversity benefit enhancement or mitigation areas
REP1-100.08	• Temporary land use remains unaccounted for in the biodiversity net gain calculations.	The Applicants have responded to this comment explained within document The Applicants' Response to Relevant Representations Part 1 - Introduction and thematic responses (PDA-005) at paragraph 2.12.2.8 that they are making a voluntary commitment to biodiversity benefit for areas of permanent habitat loss.
REP1-100.09	• The alternative route offers a more direct, cost efficient and environmental solution.	Please see the Applicant’s response to REP1-100.01.

## 2.2 Andrew John Treharne (REP1-101)

**Table 2.2: REP1-101 – Andrew John Treharne**

Reference	Written Representation Comment	Applicants' response
REP1-101.01	On December 12th 2024, I called the applicants' helpline to ask about the timescales for HGV traffic and disruption to the playing fields, I followed this with an email the next day. Despite several reminders, it took them until almost 4pm on January 27th 2025 to respond regarding HGV traffic, the last day for registering an interest in the inspection process and making written submissions. I think	The Applicants recognise the significant level of information submitted as part of the Transmission Assets application and provided assistance to those who requested support. A high volume of enquiries were received following the acceptance of the application for examination, and the Applicants endeavoured to respond to these as quickly as possible.

Reference	Written Representation Comment	Applicants' response
	<p>the applicants had a responsibility to help members of the public navigate the thousands of pages of documents to make sense of them and find what they needed to understand the potential impact on their lives. Otherwise, the helpline was little more than window dressing. I attended one of the events during the consultation, at the farmers market in St Annes. Those present were unable to answer my questions, simply leafing through the brochure which had already been sent out to residents. In their response in January, the applicants referred me to a 439-page document of tables and diagrams regarding traffic movements (document F3.7.5 Volume 3, Annex 7.5: Construction trip generation assumptions). From what I can make out, they are proposing to use Blackpool Road North as access for HGVs over a period of three and a half years with around one hundred a day for four of those months. That's around one every five minutes, six days a week. Their information indicates that this is a 1740% increase. I think it's greater than that. I've lived on this road for more than 20 years and rarely see any HGVs. It's a quiet road that doesn't lead anywhere but people's homes and the playing fields.</p> <ul style="list-style-type: none"> <li>• Where did they get their data from? Perhaps they included the bin lorry on Friday and the number 11 bus which uses part of the road a few times each day.</li> <li>• Why are they proposing to use this quiet residential road for all these HGV movements in the first place? The cable corridor runs through airport land as far as Queensway. Could some of the traffic access the corridor directly from Queensway instead? There is also the industrial estate between Kilnhouse Lane and the airport. One of the roads on the estate runs to within a few metres of the playing</li> </ul>	<p>To establish baseline conditions an Automatic Traffic Counter (ATC) was installed by a third-party specialist survey company for the Applicants in March 2024. The counter collected details of traffic flows (including vehicle composition) and speeds over 24 hours a day for seven days. A copy of the survey data is presented within Volume 3, Annex 7.2: Traffic survey data – Part 2 of 3 (APP-112) (page 1557 onward).</p> <p>It can be seen from this data that vehicles are grouped into classes 1 to 12, depending upon their size and numbers of axles. The data shows that on average throughout the seven-day week there were six heavy vehicles per day.</p> <p>The Applicants acknowledge that there would be a significant percentage change in HGV traffic. The quoted high percentage changes in HGV traffic are a result of the low background HGV flows and the Applicants would note that when baseline numbers are low, the use of percentages can create an unintentionally distorted indicator of magnitude. these figures should be viewed with caution as a percentage increase becomes an increasingly 'crude' indicator of magnitude of impact when baseline flows are very low.</p> <p>It should be noted that the assessment is based on the Maximum Design Scenario (i.e. a worst case scenario of Morgan and Morecambe Transmission Assets peak construction activity occurring concurrently resulting and the peak daily traffic that could occur for a temporary period). In reality, this peak demand would occur for a limited period of time (similar quantum for four months) and average HGV demand would be 50% or less in comparison. This can be evidenced in Volume 3, Annex 7.5: Construction trip generation assumptions, Appendix B Construction vehicle assignment diagrams and tables, (page 295) (APP-115).</p> <p>The Applicants considered alternative options to access from north and east, however, these would have required construction traffic to cross/interact with the runway (which would not be permitted by Blackpool Airport). Options to route via the industrial estate were also considered but discounted noting that access would be via existing operational car parks or service yards and could impact the operation of these businesses. These units also include a wide range of uses, including retail and recreational activities that attract the general public. Alternative options to access from the west are equally constrained due to the railway line and sand dunes.</p>

Reference	Written Representation Comment	Applicants' response
	<p>fields. Could these access points be used for at least some of the time?</p> <ul style="list-style-type: none"> <li>• If there really is no viable alternative to sending thousands of HGVs down a quiet residential road over a period of several years, they must find an alternative route on that basis alone.</li> </ul>	
REP1-101.02	<ul style="list-style-type: none"> <li>• Why is the proposed working day for construction from 8am to 6pm? That's unacceptable in a quiet residential area.</li> </ul>	As explained in their Explanatory Memorandum (REP1-010) that these are standard construction hours but would like to clarify that these are standard for projects of a similar nature.
REP1-101.03	<ul style="list-style-type: none"> <li>• The applicants are still negotiating with Blackpool Airport regarding how the cables will be installed there. If they don't know whether they are digging trenches or not, how were they able to estimate the HGV traffic flows? How realistic are these?</li> </ul>	<p>The Applicants would note that the derivation of construction traffic demand, has been based upon the Maximum Design Scenario (i.e. a worst case scenario) and appropriate contingencies have also been applied to all vehicle movements to ensure they are robust. Further details in regard to the maximum design envelope are summarised within Table 7.17 of Volume 3: Chapter 7: Traffic and Transport (APP-108) of the Environmental Statement (ES).</p> <p>It should also be noted that the Applicants have committed to the production of detailed Construction Traffic Management Plans (CTMPs). These CTMPs would set out measures to ensure that the numbers of HGV movements are managed and monitored so that the assessed numbers assessed in Volume 3: Chapter 7: Traffic and Transport (APP-108) of the ES are not exceeded. The requirement to produce the detailed CTMP(s) in accordance with the OCTMP is secured by Requirement 9 of Schedules 2A and 2B of the draft DCO (REP1-008).</p>
REP1-101.04	<ul style="list-style-type: none"> <li>• Around half the playing fields will be fenced off for health and safety reasons while drilling takes place. What is the nature of the risk to people walking above this and is it something that could also affect the animals inhabiting the nature reserve and dunes?</li> </ul>	<p>The Applicants confirm appropriate exclusion fencing will be erected on the Blackpool Road Recreational grounds for a maximum of 2 months within the 5 months of active construction to mitigation potential impacts to users (CoT123, Secured via the DCO Schedules 2A &amp; 2B, Requirement 8 (Code of Construction Practice)). The Blackpool Road Recreation Grounds is an open public space accessible 24 hours a day. Additionally, there is potential for both entry and exit pits associated with the trenchless drilling to be located within the recreation grounds, to ensure public safety during construction, temporary exclusion fencing will be erected around the vicinity of these works.</p>

Reference	Written Representation Comment	Applicants' response
		<p>In comparison to the playing fields, the St Anne's Link Golf course operates under controlled access conditions, with staggered usage based on the rate of play, restricted numbers to members and paying visitors, as well as access restricted to specific hours. All works occurring within the order limits through the golf course will be entirely underground, with the entry pits located within Blackpool Airport and the exit pits located at the beach.</p> <p>Regarding the potential impact on wildlife within the Lytham St Annes Local Nature reserve and Lytham St Anne's Dunes SSSI, these areas will not be directly impacted by the trenchless drilling. As outlined in the Project Description (F1.3/F03), the trenchless method involves installing cables to a minimum depth of 10m, ensuring no surface disturbance or habitat disruption occurs within these sensitive areas.</p> <p>The Work Nos 8A/8B (as shown on Sheet 5 in the Work Plans F1.3/F03) cover the golf course with the cable circuits at this location installed underground via trenchless technique with no impact to the surface at the golf course. A further comparison of works occurring within the St Anne's Link Golf course and the Blackpool Road Recreational Grounds is provided within response REP1-101.04.</p>
REP1-101.05	<ul style="list-style-type: none"> <li>• They said that they are not going to fence off any of the Old Links golf course while the cables are installed. At the open hearing, they mentioned the relative size of the playing fields and the numbers of people using them. Looking at the map, the golf course looks to be about four times the size of the playing fields. Exactly how do they propose to keep golfers off the cable route for months at a time if they are unable to do this on the much smaller fields?</li> </ul>	Please see the response to REP1-101.04 above.
REP1-101.06	<ul style="list-style-type: none"> <li>• As I understand it from one of the football volunteers, this could mean the loss of the full sized 11-a-side pitches and the 5-a-side pitches. Leaving them with one community pitch and a few others. The only alternative I've heard being suggested is at Poolfoot Farm in Fleetwood. This is ten miles from the playing fields, with Blackpool in between. I know from making the journey many times</li> </ul>	The Applicants have committed that where mitigation is required for construction activities at Blackpool Road Recreation Ground (for example, the relocation or provision of alternate amenities) these measures will be secured via separate agreements with the relevant parties. For example, via section 106 agreements under the Town and Country Planning Act 1990 and/or section 111 agreements under the Local Government Act 1972 via the following commitment, CoT20 (see Volume 1, Annex 5.3: Commitments Register (F 1.5.3/F03)).

Reference	Written Representation Comment	Applicants' response
	when I worked in Fleetwood, that this can take between 30 minutes and an hour to drive, depending on the time of day. Aside from it being highly unlikely they have so many fields sitting around spare, this will mean many players and volunteers being unable to take part. At the moment, they can walk or cycle to the fields or be dropped off and picked up a few minutes from home. Instead, they would face a 20-mile round trip. That doesn't sound very green to me. As a family, we know how difficult that can be as one of us plays football in Fleetwood once a week. It's not possible for someone to drive them there without waiting at the ground until they've finished.	The Applicants are continuing to proactively engage with Fylde Borough Council and St Annes Football Club to further develop the mitigation options; however an alternative location has not yet been decided.

## 2.3 Andy Lee (REP1-103)

**Table 2.3: REP1-103 – Andy Lee**

Reference	Written Representation Comment	Applicants' response
REP1-103.01	Chairman of FACTS Sub postmaster for freckleton. Sectary of LDWA, and a land holding of 4.500. Inland on the Cable corridor route. After trying 3 times of trying to summit my statement, when comes to numbers, it automatically closes down. I will be speaking on the 24 th of July.	The Applicants note the response and look forward to hearing from Mr Lee at the hearing.

## 2.4 Angela Esslinger (REP1-104)

**Table 2.4: REP1-104 – Angela Esslinger**

Reference	Written Representation Comment	Applicants' response
REP1-104.01	<p>Alternative Route We welcome the Planning Inspectorate's approach to reporting on alternatives and referencing the Stonehenge and Langley Park School judgements. Both set precedents around considering alternatives, and the concept of Materially Advantageous Solutions. There is an established connection of an Irish Sea Wind Farm to Penwortham. This routes via the National Grid line that runs northwest to Hambleton and then on to Middleton/Heysham. At Hambleton, there is a tee junction to Stanah substation to which Walney 2 is connected and which supplies Blackpool North and the Isle of Man. This existing line is 400KV capability already but to accommodate more offshore wind power, additional cables would be beneficial on the existing pylon system. This was accounted for when presenting the alternative with a substantial cost saving of £450m, based on the 2012 grid costings. The line is capable of taking the power levels of M&amp;M at normal operating levels, which is at about 40% of maximum capacity. Looking to the future, the excess could be used to generate green hydrogen, which is the proposed use by the current site owner of Hillhouse TEZ land. We note the various attempts by the applicants to avoid responsibility for considering any alternatives. These include the Michael Shanks MP response which clearly references an earlier version covering a Morecambe Bay scheme. Instead, the applicants looked for complex and costly engineering solutions rather than simple options and continue to refuse to acknowledge any possibility of an alternative route. The Moor Vannin proposal shows that a wider landfall area can be considered and would allow the</p>	<p>As noted above at section 1.1 Introduction, a number of responses have provided comments on site selection and the assessment of alternatives including suggesting that the Point of Interconnection for the Transmission Assets should be at or via Stanah. The Applicants provided an initial response on site selection and the assessment of alternatives at section 2.31.1 of The Applicants' Response to Relevant Representations Part 1 - Introduction and thematic responses (PDA-005). Following discussions relating to site selection and alternatives at Issue Specific Hearing 1 and in response to a number of the Examining Authority's Hearing Action Points, the Applicants provided a detailed technical response on these matters including explaining why the proposed alternative connection to Stanah is not a viable alternative. This was provided at Deadline 1 in Annex 5.2 to the Applicants response to Hearing Action Points: ISH1 6, 8, 9, 19, 26 &amp; 28 - Rev F01 (REP1-039).</p>

Reference	Written Representation Comment	Applicants' response
	<p>option of the 'alternative route' with all the advantages that M&amp;M have ignored. EN5 2.3.17 seeks the reduction of impacts. It is telling that the applicant repeatedly defers to National Grid any responsibility for the decision on landfall, route and connection point. There remains no acceptance of any responsibility by the applicant for options to get power to Penwortham instead they simply 'do as they are told.' Landfall should be based on the shortest and most direct route. The alternative route is shorter, has available landfall, connects to an available substation and whose owner wants it. It meets all four criteria in the HNDR - 1. Cost to consumer 2. Deliverability and Operability 3. Impact on environment 4. Impact on local communities</p> <p>The Applicant said that Hillhouse substations would need more 400KV cabling but this is incorrect. It is already 400kV. The alternative proposed removes all of the issues that follow, without exception, and also would benefit the offshore route by taking the cable path outside of a protected offshore area close to Blackpool.</p>	
REP1-104.02	<p>Site selection and joined up approach The Site selection was predetermined given the extension of search area from 5km to 8km, and the downgrading of taking 22Has of Green Belt to Amber instead of Black or Red. It has become clear that far from being a joined-up proposal there are no benefits to local communities of a joint proposal from M&amp;M. There are concerns about the corporate structure of the applicants and their financial viability. The applicants refuse to commit to a single period of construction, instead wanting to allow a period of up to four years between schemes, with 3 years for the first scheme, up to four years gap and then a further 3 years with a 2 period of at least 10 years allowed. This is only of benefit to the applicants and not to local communities impacted by these proposals. One proposal could wait for</p>	<p>Please see the Applicants response to REP1-104.2 In addition Section 7 of Annex 5.2 to the Applicants response to Hearing Action Points: ISH1 6, 8, 9, 19, 26 &amp; 28 - Rev F01 (REP1-039) sets out the benefits of coordination and need for project separation.</p>

Reference	Written Representation Comment	Applicants' response
	the other to ensure this and a limit for the overall time could be set. These matters can be enforced in the DCO.	
REP1-104.03	Consultation and engagement with stakeholders It is clear that there are numerous examples of where there is a lack of clarity, a lack of engagement with major stakeholders and failure to respond constructively to reasonable requests from the Panel and others. This lack of engagement is reflected in the lack of detail in the applicant's submission. The lack of detail shows poor preparation, poor engagement with stakeholders and poor co-ordination between the two sides of the project.	The Applicants have responded to concerns in relation to Consultation in Section 2.2.2 of their Response to Relevant Representations Part 1 - Introduction and thematic responses (PDA-005) in particular noting that the Acceptance Checklist (s55) (PD-003) where the Planning Inspectorate confirms in relation to adequacy of consultation it "is satisfied that the Applicants have complied with their statutory obligations." The Applicants note this was similarly acknowledged by the Examining Authority (see paragraph 30 of The Applicants' Hearing Summary of the Compulsory Acquisition Hearing 1 (REP1-036)). The Applicants would also note that they have carried out extensive rounds of non-statutory consultation which are detailed within the Applicants
REP1-104.04	Agriculture The failure to ensure concurrent rather than sequential construction will have a detrimental effect on local landowners and farmers. Instead of farmers' losing their land for 3 years they will lose it for 10 years. There is little opportunity for any activity 'in-between' and livestock herds cannot be turned off, on, off and on again during a 10 year period. Equally arable land will be damaged during construction with too little time to recover before further damage and disruption in the second wave of construction. The financial impact of this prolonged construction is profound.	The Applicants have responded to this comment within section 2.3.2 of The Applicants' Response to Relevant Representations Part 1 - Introduction and thematic responses (PDA-005).  The Applicants in their response to Issue Specific Hearing Action Point 46 confirmed that they are aware that there are different types of agricultural and rural business across the Transmission Assets order limits, including dairy, beef, mixed livestock, arable, mixed and equine. These businesses all have slightly differing farming calendars throughout the seasons and therefore the use and timings of activities on the land differ.
REP1-104.05	Beach Access The prospect of a beach closure at St Annes was dismissed by the applicant, whereas it is clear that closures of the beach will occur and there appear to be no mitigation plans for access in place. The applicant refused to provide plans for the beach when asked by the Inspectors. Furthermore there is an outstanding risk assessment and engagement with the Environment Agency which means their commitment is not secured. There is an ecosystem under the dunes that has not been	The Applicants previously addressed concerns relating to beach access in section 2.5 of The Applicants' Response to Relevant Representations Part 1 - Introduction and thematic responses (PDA-005). Following the discussions at the Hearings, and in response to Hearing Action Points, the Applicants provided further detailed technical clarifications in relation to beach access in Annex 5.3 to the Applicants response to Hearing Action Points: ISH1 13, 14, 16, 17 (REP1-040).  Further details of the public access to the beach during construction is set out in The Outline Open Space Management Plan which is at Appendix A of the Outline Public

Reference	Written Representation Comment	Applicants' response
	adequately considered by the applicant and any damage has no planned mitigation.	<p>Rights of Way (PRoW) Management Plan (AS-048). This sets out the discrete working areas that will be subject to access management during construction works.</p> <p>The Applicants are in ongoing dialogue with the Environment Agency (EA) and have resolved a number of matters with them as confirmed by the EA's written representation REP1-076. The Applicants are continuing to actively engage with the Environment Agency to resolve all outstanding matters including those relating to the Lytham St Annes SSI (sand dunes) as set out at ISH1_49 of The Applicants' response to Hearing Action Points due at Deadline 1 (REP1-037). This includes providing a preliminary hydrogeological risk assessment in relation to the trenchless installation beneath Lytham St Annes SSSI at Deadline 3.</p>
REP1-104.06	Air safety We are concerned at the lack of engagement with BaE Systems and the failure to commit to a survey. Their importance to us in terms of our defence, and to the local economy is profound and would be compromised without an agreement on managing birdstrikes. The applicant is sluggish and unresponsive to legitimate concerns on air safety and the future of BaE Systems. Indeed it seems that no likely mitigation is available according to BaE Systems	<p>The Applicants take safety seriously and have previously responded to this matter relating to BAE Systems Warton within document The Applicants' Response to Relevant Representations Part 1 - Introduction and thematic responses (PDA-005), please see paragraphs 2.21.2.4 to 2.21.2.7 and provided further detail in their Deadline 1 Cover letter (REP1-001). In particular the Applicant has responded to issues around birdstrike in their response to Issue Specific Hearing 1 Action Point 40, in the Applicants' response to Hearing Action Points due at Deadline 1 (REP-037)</p> <p>Further detail on the site selection for the mitigation and biodiversity benefit areas is being submitted at Deadline 2.</p> <p>The Applicants are in ongoing dialogue with by BAE Systems Warton (Aerodrome) and are confident that any concerns can be satisfactorily addressed. The Applicants are committed to working with BAE Systems to provide them with the necessary information to undertake all aspects of their safeguarding assessment, including details for bird strike mitigation and will do so as part of continued engagement throughout the Examination.</p>
REP1-104.07	Community Benefits Unfortunately, M&M avoided defining any community benefits until the application has been approved. TASC has offered to engage with M&M about how community benefits, in line with Government guidance issued on 9th April 2025, might work if the proposal was approved. This was rejected out of hand by the applicant.	<p>The Applicants regret that due to the timetabling of the Government's guidance they were unable to engage in the dialogue that TASC were seeking. In relation to community benefits, following discussion in Issue Specific Hearing 1 and in response to Examining Authority's Hearing Action Point ISH1_31 the Applicants have updated their Statement of Reasons with information on local community benefits. As confirmed by the Applicants in Issue Specific Hearing 1 they will be providing community benefits in</p>

Reference	Written Representation Comment	Applicants' response
	The new community funds guidance means communities would get £530,000 per substation.	line with Government guidance (see page 11 of The Applicants' Hearing Summary of the Issue Specific Hearing 1: Day 2 (REP1-035)). The Applicants will also be undertaking further engagement on community benefits with local stakeholders as discussed in The Applicants' response to Hearing Action Points due at Deadline 1 - Rev F01 (REP1-037).
REP1-104.08	Cumulative Impact Existing projects already cover 225 acres with nuclear and solar energy within the Parish – larger than the villages of Newton with Scales and Clifton together. In addition there are two proposed solar farms making another 249 acres. One of these, 25/0541 on the Fylde Council website “Installation of a 32 hectare solar farm with associated infrastructure including: series of solar photovoltaic arrays, switch rooms, substations, inverters power stations, fencing, pole mounted CCTV cameras, access tracks and landscaping with biodiversity measures” on the land west of Parrox Lane, Newton with Clifton, is adjacent to the proposed M and M substations. Previously rejected because of the poor access for hundreds of HGV's down Parrox Lane, it now proposes an access route for construction which runs along Lower Lane, Freckleton (which is also proposed for the M&M traffic) and then onto a bridleway, public right of way, leading onto a track which goes across the cabling route. The applicants' 3 proposal clearly avoids these proposed solar farms but given they are likely to be considered by Fylde Borough Council Planning prior to the end of this DCO examination it is unclear how any conflicts in access would be addressed. These proposals in total would result in a non-stop sea of solar panels, substations and cabling route on the greenbelt and best and most valued farmland between Newton with Scales, Freckleton and Kirkham. It is very clear that there has been no consideration of the	<p>The Applicants have responded to matter of cumulative effects in response to Issue Specific Hearing Action Point 29 which can be found in The Applicants' response to Hearing Action Points due at Deadline 1 - Rev F01 (REP1-037).</p> <p>The Applicants have carried out Cumulative Effects Assessment (CEA) screening and refer to Volume 1, Annex 5.5: Cumulative screening matrix and location plan (REP1-020) The Applicants will be submitting an update vis Review of Cumulative Effects Assessment and In-Combination Assessment at Deadline 2.</p>

Reference	Written Representation Comment	Applicants' response
	cumulative impact of these proposals on the local community.	
REP1-104.09	<p>Ecology May birds on the UK red list for birds of conservation concern have been observed on the land scheduled for the substations over the past 5 years, including: lapwing, grey partridge, greenfinch, house martin, marsh warbler, curlew, black tailed godwit, woodcock, dunlin, lesser spotted woodpecker, mistle thrush, herring gull, common cuckoo, swift, yellow wagtail, marsh tits, marsh warbler, skylark, yellowhammers house sparrows and starlings. Other protected species include great crested newts, hedgehogs and pipistrelle bats. From the Biodiversity Statement ([AS-054]) it seems that they are only providing biodiversity net gain (BNG) for the permanent land take. The rules require land that is used temporarily and not fully reinstated for two years also to be included in the BNG calculation; presumably that will apply to most of the cable routes, so they should be included as well. Any reduction in the quality of (the permanent) habitat at Newton March, Lytham Moss, Freckleton Marsh and Lea Marsh to discourage birds from visiting it will have a consequential effect on the biodiversity score so it may not be possible to satisfy BNG requirements (admittedly not yet a legal obligation but recommended in policy) and avoid increasing bird strike risk. The proposed habitat can be found on page 56 of APP-106 These points were summarily dismissed as BNG was not a legal requirement despite this being a government intention, that the applicant was seeking to meet it, and would be a legal requirement later this year.</p>	<p>The Applicants have responded to the matter of Ecology in section 2.12 of their Response to Relevant Representations Part 1 – Introduction and thematic responses (PDA-005).</p> <p>In response to submissions made regarding Biodiversity Net Gain, the Applicants are pleased to reconfirm that although the requirement to provide BNG is not a legal requirement it is being provided voluntarily as explained in the Biodiversity Statement (AS-054).</p>
REP1-104.10	<p>Flooding It is unclear that all aspects of the questions posed regarding flooding and drainage have been fully accounted for. Examples of this relate to mitigation of the</p>	<p>The Applicants have responded to the matter of flood risk at Section 2.16 within document The Applicants' Response to Relevant Representations Part 1 - Introduction and thematic responses (PDA-005) and in response to Issue Specific Hearing Action</p>

Reference	Written Representation Comment	Applicants' response
	issues of interrupting the drainage water courses by the build work especially if it is not known exactly what has been done previously and these works lie hidden below ground, which many drains will do, especially on farmland. Much of the land is already prone to flooding.	points 48 and 49 contained in the Applicants' response to Hearing Action Points due at Deadline 1 - Rev F01 (REP1-037).
	Heritage The Lancashire Historic Environment Record shows there are Bronze Age Cairns, Roman Fort settlements and Quaker burial grounds. Freckleton, Newton and Kirkham are all mentioned in the Domesday book. There have been numerous Roman finds in the areas of Kirkham and Dowbridge areas, where there was access to the sea along the river Dow. Indeed one of the tracks proposed for HGV access south of Newton is called 'Thames Street'. The Lancashire Historic Environment Record states: "This area of Lancashire is considered to be one of the richest areas of Neolithic to Bronze Age activity within the North West" therefore causing potential damage to future archaeological research and buried artefacts. Allegedly the church and lost hamlet of Kilgrimol may remain buried in the sands under the site of the incoming cable route, between Starr Gate and St Annes.	The matter of heritage and archaeology is discussed in the Applicants' Response to Relevant Representations Part 1 - Introduction and thematic responses (PDA-005) at Section 2.18. The Applicants are committed to respecting the heritage of the local area and Requirement 11 of Schedules 2A and 2B of the draft DCO (REP1-008) requires that detailed Onshore and Intertidal Written Schemes of Investigation will be implemented by the Applicants as approved by Lancashire County Council in consultation with Historic England, as appropriate. Further, any archaeological works must be carried out by a suitably qualified and competent person or body previously notified to the relevant planning authority.
REP1-104.11	Local economy We welcome the Planning Inspectorate seeking a review of the impact of the proposals on the Fylde rather than the whole North West, taking into account of Fylde being a peninsula. The current approach is too high level and the assessment is not appropriate.	The Applicants have responded to the point raised by the Examining Authority in Annex 5.10 to the Applicants response to Hearing Action Points: ISH1 52 (REP1-046) with a note on effects on local business and tourism.
REP1-104.12	National Planning considerations 4 NPPF sets out the need for "very special purpose" to justify use of Green Belt land and that there should be consideration of public health and wider defence and security issues. The applicants' case does not adequately justify the use of green belt or take adequate account of these other issues.	In relation to the Green Belt, the Applicants have responded to this comment at Section 2.17.2 within document The Applicants' Response to Relevant Representations Part 1 - Introduction and thematic responses (PDA-005). The Applicants have also demonstrated in section 6 of the Planning Statement (REP1-032) that the significant benefits of the Transmission Assets, as a result of energy transmission from renewable sources, mean that even if the Transmission Assets were not considered to be Critical

Reference	Written Representation Comment	Applicants' response
		<p>National Priority Infrastructure, very special circumstances exist which outweigh any harm to Green Belt.</p> <p>Further consideration of Green Belt matters has been set out in the Applicant's response to Hearing Action Points due at Deadline 1 - Rev F01 (REP1-037).</p>
REP1-104.13	<p>Recreation spaces Disappointing that the applicant wrongly excluded Sport England as a Statutory Consultee. As with other areas there is a lack of clarity about the nature of the works proposed and a lack of detail regarding the impact of the proposed works on recreation areas in the Fylde</p>	<p>As explained by the Applicant and noted in the Applicants' Hearing Summary of the Issue Specific Hearing 1: Day 1 Rev F01(REP1-034), Sport England are not a statutory consultee and whilst the Applicants would welcome any engagement from Sport England they are in discussions with Fylde Borough Council and others in relation to recreation matters, please see section 2.28.2 of the Applicants' Response to Relevant Representations Part 1 - Introduction and thematic responses (PDA-005).. The Applicants have also provided a note as to the likely time duration and the extent of the impacts on the Blackpool Road recreation ground in their response to Hearing Action Points: ISH1 18: Blackpool Road Recreation Ground – Summary of impacts (REP1-041)</p>
REP1-104.14	<p>Safety Because of the location of Blackpool Airport, there are only two north / south major arterial roads between Blackpool and St Anne's. One is Clifton Drive to the west of the airport and the other is Queensway to the east of the airport. Both roads become major bottlenecks when planned roadworks are carried out on just one side of the airport, causing long queues of traffic and severe delays. Both these roads will need to be crossed by the cable route. We have not seen any 'emergency vehicle impact statement' in relation to access by Police, Fire, Ambulance and Coastguard emergency vehicles. We are also concerned that many other issues remain unresolved. These include: • The LPG and liquid ethane routes which are crossed by the cabling route • Impact of increased traffic, including heavy goods vehicles, on pedestrians, motorised wheel chair users, horse riders, and cyclists • Concerns about birdstrike impacting on air safety for local people. There is major local sensitivity on this subject. In 1944, an aircraft crashed into a school in Freckleton, killing many children and it remains the worst disaster for loss of</p>	<p>The Applicants have assessed the potential impact of the Transmission Assets on emergency services in Volume 3, Chapter 7: Traffic and Transport (APP-108) which considers the Transmission Assets traffic in relation to driver delay, severance, non-motorised user delay, fear and intimidation, road safety and abnormal loads.</p> <p>During construction, when the greatest impacts to the considerations on emergency services will be experience, the Applicants highlight that extensive commitments have been made to minimise disruption. The use of trenchless installation techniques, such as Horizontal Directional Drilling (HDD) to minimise disruption to all A, B and Classified roads (with the exception of Leach Lane) and railways proposed to be crossed by the Transmission Assets (see CoT02, Volume 1, Annex 5.3: Commitments Register (F 1.5.3/F03)). This commitment to the use of trenchless techniques is secured via Requirement 8 (Code of Construction Practice) of Schedules 2A and 2B of the draft DCO (REP1-008). With regard to Leach Lane, the Applicants have committed to maintaining access, with works completed on a 'half / half basis' with traffic to be controlled through the use of temporary traffic management, such as traffic signals. The open cut trenching on Leach Lane is not expected to result in any road closures and vehicular access would always be maintained including for emergency services and for buses.</p>

Reference	Written Representation Comment	Applicants' response
	<p>life on the ground in England. • Concerns about the failure to agree a transport plan and its impact on traffic accidents and fatalities. • Substation failure and proximity to residential areas as shown by three recent examples of substation fires.</p>	<p>The approach to managing highway crossings is outlined in Section 1.10 of the Outline Construction Traffic Management Plan (OCTMP) (J5/F02).</p> <p>Subject to the grant of the DCO, the Applicants would note that the effects of construction traffic and highway works from Transmission Assets would be managed, monitored and controlled through the development of the detailed CTMPs. In compliance with Requirement 9 in Schedules 2A and 2B of the draft DCO (REP1-008), the detailed CTMPs would need to be agreed with the relevant highway authorities. In approving the detailed CTMPs the relevant highway authorities would apply their statutory duties under the Traffic Management Act, 2004 to ensure the “expeditious movement of traffic on the authority’s road network” which includes emergency services.</p> <p>The Applicants take safety seriously and have previously responded to this matter relating to BAE Systems Warton comment within document The Applicants' Response to Relevant Representations Part 1 - Introduction and thematic responses (PDA-005), please see paragraphs 2.21.2.4 to 2.21.2.7 and provided further detail in their Deadline 1 Cover letter (REP1-001). In particular the Applicants have responded to issues around birdstrike in their response to Issue Specific Hearing 1 Action Point 40, in the Applicants' response to Hearing Action Points due at Deadline 1 (REP-037). Further detail on the site selection for the mitigation and biodiversity benefit areas is being submitted at Deadline 2.</p> <p>The Applicants confirmed at Issue Specific Hearing 1 that engagement with BAE is ongoing in order to agree a strategy for a bird strike management plan (see paragraphs 60 - 64 of The Applicants' Hearing Summary of Issue Specific Hearing 1 – Day 2 (REP1-035)). The Applicants also provided responses in relation to this matter at ISH1_40 of The Applicants' response to Hearing Action Points due at Deadline 1 (REP1-037) and provided further detail in relation to engagement with both BAE and Blackpool Airport in the Deadline 1 Cover letter (REP1-001). At deadline 2, the Applicants have submitted the Strategy for Wildlife Hazard Management Plan (S_D2_14) which has been shared with BAE and Blackpool Airport as part of the Applicants ongoing engagement with those bodies as explained in the Applicants responses to Blackpool Airport and BAE written representations in The Applicants Responses to Written Representations from Statutory</p>

Reference	Written Representation Comment	Applicants' response
		Consultees and other organisations (S_D2_3). The Applicants will continue to actively engage with BAE and Blackpool Airport to resolve their concerns in relation to bird strike.
REP1-104.15	Traffic and Transport There are already issues with existing road capacity and delays. This includes the M6 access to the Fylde where there are regular accidents and delays. It also includes Preston Road Lytham which prevented some members of the public attending the hearings. We support the concerns expressed by Lancashire County Council (LCC) about flawed traffic plans and the need to not compromise on safety. In particular we have concerns about 5km of roads that do not appear able to take this level of traffic either in terms of road quality or sharing with pedestrians etc. These include "moss roads" which LCC has a specific statutory for and which are not suitable for heavy vehicles. There remains no detailed or agreed transport plans as sought by LCC and Fylde Borough Council	The Applicants have responded to the matter of traffic and transport at Section 2.32 within document The Applicants' Response to Relevant Representations Part 1 - Introduction and thematic responses (PDA-005).
REP1-104.16	A shorter, more cost-effective alternative could connect Penwortham via Stanah using an existing National Grid line, saving an estimated £903m. This route would repurpose a brownfield site, creating jobs in Lancashire's deprived areas for green hydrogen production. However, applicants dismiss its feasibility, opting instead for a new, complex route across Greenbelt land. Concerns include poor site selection, long construction periods, and minimal local benefits. Stakeholders feel consultation efforts are lacking. Agricultural disruption, beach access restrictions, unresolved air safety risks, and emergency vehicle access limitations add to the issues. Community benefits remain undefined, and cumulative impacts on Greenbelt areas and biodiversity lack proper assessment. Despite these concerns, applicants refuse to consider realignments,	<p>The Applicants have responded to this comment within The Applicants' Response to Relevant Representations Part 1 - Introduction and thematic responses (PDA-005). For a more technical response see document Annex 5.2 to the Applicants response to Hearing Action Points: ISH1 6, 8, 9, 19, 26 &amp; 28 - Rev F01 (REP1-039).</p> <p>In relation to impacts on emergency services the Applicants have assessed the potential impact of the Transmission Assets on emergency services in Volume 3, Chapter 7: Traffic and Transport (APP-108) which considers the Transmission Assets traffic in relation to driver delay, severance, non-motorised user delay, fear and intimidation, road safety and abnormal loads.</p> <p>During construction, when the greatest impacts to the considerations on emergency services will be experienced, the Applicants highlight that extensive commitments have been made to minimise disruption. The use of trenchless installation techniques, such as Horizontal Directional Drilling (HDD) to minimise disruption to all A, B and Classified</p>

Reference	Written Representation Comment	Applicants' response
	<p>risking a decade of disruption. The overlooked alternative offers a simpler, more sustainable solution.</p>	<p>roads (with the exception of Leach Lane) and railways proposed to be crossed by the Transmission Assets (see CoT02, Volume 1, Annex 5.3: Commitments Register (F 1.5.3/F03)). This commitment to the use of trenchless techniques is secured via Requirement 8 (Code of Construction Practice) of Schedules 2A and 2B of the draft DCO (REP1-008). With regard to Leach Lane, the Applicants have committed to maintaining access, with works completed on a 'half / half basis' with traffic to be controlled through the use of temporary traffic management, such as traffic signals. The open cut trenching on Leach Lane is not expected to result in any road closures and vehicular access would always be maintained including for emergency services and for buses.</p> <p>The approach to managing highway crossings is outlined in Section 1.10 of the Outline Construction Traffic Management Plan (OCTMP) (J5/F02).</p> <p>Subject to the grant of the DCO, the Applicants would note that the effects of construction traffic and highway works from Transmission Assets would be managed, monitored and controlled through the development of the detailed CTMPs. In compliance with Requirement 9 in Schedules 2A and 2B, the detailed CTMPs would need to be agreed with the relevant highway authorities. In approving the detailed CTMPs the relevant highway authorities would apply their statutory duties under the Traffic Management Act, 2004 to ensure the "expeditious movement of traffic on the authority's road network" which includes emergency services.</p> <p>The Applicants previously addressed concerns relating to beach access in section 2.5 of The Applicants' Response to Relevant Representations Part 1 - Introduction and thematic responses (PDA-005). Following the discussions at the Hearings, and in response to Hearing Action Points, the Applicants provided further detailed technical clarifications in relation to beach access in Annex 5.3 to the Applicants response to Hearing Action Points: ISH1 13, 14, 16, 17 (REP1-040).</p> <p>Further details of the public access to the beach during construction is set out in The Outline Open Space Management Plan which is at Appendix A of the Outline Public Rights of Way (PRoW) Management Plan (AS-048). This sets out the discrete working areas that will be subject to access management during construction works.</p>

Reference	Written Representation Comment	Applicants' response
		In relation to community benefits, following discussion in Issue Specific Hearing 1 and in response to Examining Authority's Hearing Action Point ISH1_31 the Applicants have updated their Statement of Reasons with information on local community benefits. The Applicants will also be undertaking further engagement on community benefits with local stakeholders as discussed in The Applicants' response to Hearing Action Points due at Deadline 1 - Rev F01 (REP1-037).

## 2.5 Ann DeRizzio (REP1-107)

**Table 2.5: REP1-107 – Ann DeRizzio**

Reference	Written Representation Comment	Applicants' response
REP1-107.01	<p>Alternative Route</p> <p>We welcome the Planning Inspectorate's approach to reporting on alternatives and referencing the Stonehenge and Langley Park School judgements. Both set precedents around considering alternatives, and the concept of Materially Advantageous Solutions.</p> <ol style="list-style-type: none"> <li>1. There is already an established connection of an Irish Sea Wind Farm to Penwortham. This routes via the National Grid line that runs northwest to Hambleton and then on to Middleton/Heysham.</li> <li>2. At Hambleton, there is a tee junction to Stanah substation to which Walney 2 is connected and which supplies Blackpool North and the Isle of Man. This existing line is 400KV capability already but to accommodate more offshore wind power, additional cables would be beneficial on the existing pylon system.</li> </ol>	<p>The Applicants refer to their response to Relevant Representations Part 1 - Introduction and thematic responses (PDA-005). For a more detailed response see document Annex 5.2 to the Applicants response to Hearing Action Points: ISH1 6, 8, 9, 19, 26 &amp; 28 - Rev F01 (REP1-039). As noted above at section 1.1 Introduction, a number of responses have provided comments on site selection and the assessment of alternatives including suggesting that the Point of Interconnection for the Transmission Assets should be at or via Stanah. The Applicants provided an initial response on site selection and the assessment of alternatives at section 2.31.1 of The Applicants' Response to Relevant Representations Part 1 - Introduction and thematic responses (PDA-005). Following discussions relating to site selection and alternatives at Issue Specific Hearing 1 and in response to a number of the Examining Authority's Hearing Action Points, the Applicants provided a detailed technical response on these matters including explaining why the proposed alternative connection to Stanah is not a viable alternative. This was provided at Deadline 1 in Annex 5.2 to the Applicants response to Hearing Action Points: ISH1 6, 8, 9, 19, 26 &amp; 28 - Rev F01 (REP1-039).</p>

Reference	Written Representation Comment	Applicants' response
	<p>4. Using i data from the latest IET 2025 report on Transmission Technologies would suggest a saving of £900m could be achieved from using the established Northern Route infrastructure via Stanah-HTEZ rather than the applicants route.</p> <p>5. Why have the applicants not considered other alternatives. . Instead, the applicants looked for complex and costly engineering solutions rather than simple options and continue to refuse to acknowledge any possibility of an alternative route. Which is not logical, practicable or reasonable and is detrimental to the residents and businesses in the Fylde.</p> <p>6. There remains no acceptance of any responsibility by the applicant for options to get power to Penwortham instead they simply 'do as they are told.' Which again is not logical , reasonable showing that all avenue have been researched etc.</p> <p>7.Landfall should be based on the shortest and most direct route. The alternative route is shorter, has available landfall, connects to an available substation and whose owner wants it. . The alternative proposed removes all of the issues that follow, without exception, and also would benefit the offshore route by taking the cable path outside of a protected offshore area close to Blackpool. Which is a reasonable and practical solution</p> <p>7. M&amp;M. proposals maximises the impact to the area and the people living in the Fylde .</p>	
REP1-107.02	<p>8. The applicants refuse to commit to a single period of construction, instead wanting to allow a period of up to four years between schemes, with 3 years for the first scheme, up to four years gap and then a further 3 years with a period of at least 10 years allowed. This is only of</p>	<p>The time periods noted are a worst case scenarios and the Applicants would like to reassure Ms DeRizzio and others that it is their intention to deliver the Transmission Assets as quickly as possible and with as little disruption as possible to local communities. Unfortunately, there is a need for project separation which the Applicants' have set out in Section 8 of document Annex 5.2 to the Applicants response to Hearing</p>

Reference	Written Representation Comment	Applicants' response
	benefit to the applicants and not to local communities impacted by these proposals. Surely they should be able to give a better time frame structure - nothing here is constructive not just local people but wildlife and environment	Action Points: ISH1 6, 8, 9, 19, 26 & 28 - Rev F01 (REP1-039). In delivering the Transmission Assets greater certainty can be given in the post consent stage where relevant planning authorities and others will be involved in approval of stages of the construction of the Transmission Assets.
REP1-107.03	9. There has been a distinct lack of proper engagement and consultation with stake holders - It is apparent that there are numerous examples of where there is a lack of clarity, a lack of engagement with major stakeholders and failure to respond constructively to reasonable requests from the Panel and others. This shows that M & M have not thoroughly planned their submission and have not engaged with stakeholders because they do not have the answers to reasonable questions.	The Applicants take consultation and ongoing communications with the community seriously. A number of non-statutory consultations, alongside statutory consultations in accordance with the Planning Act 2008. A range of consultation events were held in the vicinity of the proposed Transmission Assets, including online events, exhibitions and pop-up events between November and December 2022, April and June 2023, and October and December 2023. These events were advertised in local newspapers, on local radio, on posters in the local area, through postcards and newsletters distributed through the local area and on social media. Further details can be found in the Consultation Report (APP-170).
REP1-107.04	Agriculture - They have failed to work with farmers and do not seem to understand how livestock are kept, what they eat or where and how they graze or the financial implications to farmers because of the construction and disruption	In relation to Agriculture the Applicants have responded to this matter within document The Applicants' Response to Relevant Representations Part 1 - Introduction and thematic responses (PDA-005) at Section 2.3. The Applicants are engaged in continued discussions and negotiations with landowners, including compensation provisions to address impacts to the existing farming business, where these cannot be avoided but the Applicants want to minimise any disruption to farmers which is reflected in their choice of trenchless construction techniques.
REP1-107.05	Beach Access Closing and or drastically altering access to the beach will have a significant impact on tourism and local people. It will make it impossible for people with disabilities to easily access the beach and will thus hamper well being, and goes against disability discrimination laws. The beach ecosystem including wildlife rare and migrating will be greatly impacted by how the dunes and the beach is going to be destroyed in the process. The ecosystem under the dunes that has not been adequately considered	The Applicants previously addressed concerns relating to beach access in section 2.5 of The Applicants' Response to Relevant Representations Part 1 - Introduction and thematic responses (PDA-005). Following the discussions at the Hearings, and in response to Hearing Action Points, the Applicants provided further detailed technical clarifications in relation to beach access in Annex 5.3 to the Applicants response to Hearing Action Points: ISH1 13, 14, 16, 17 (REP1-040).  Further details of the public access to the beach during construction is set out in The Outline Open Space Management Plan which is at Appendix A of the Outline Public

Reference	Written Representation Comment	Applicants' response
	by the applicant and any damage has no planned mitigation.	<p>Rights of Way (PRoW) Management Plan (AS-048). This sets out the discrete working areas that will be subject to access management during construction works.</p> <p>The Applicants are in ongoing dialogue with the Environment Agency (EA) and have resolved a number of matters with them as confirmed by the EA's written representation REP1-076. The Applicants are continuing to actively engage with the Environment Agency to resolve all outstanding matters including those relating to the Lytham St Annes SSI (sand dunes) as set out at ISH1_49 of The Applicants' response to Hearing Action Points due at Deadline 1 (REP1-037). This includes providing a preliminary hydrogeological risk assessment in relation to the trenchless installation beneath Lytham St Annes SSSI at Deadline 3.</p>
REP1-107.06	Air safety The lack of engagement with BAE Systems is apparent and the failure to commit to a survey does not show good practice .s	<p>The Applicants take safety seriously and have previously responded to this matter relating to BAE Systems Warton comment within document The Applicants' Response to Relevant Representations Part 1 - Introduction and thematic responses (PDA-005), please see paragraphs 2.21.2.4 to 2.21.2.7 and provided further detail in their Deadline 1 Cover letter (REP1-001). In particular the Applicants have responded to issues around birdstrike in their response to Issue Specific Hearing 1 Action Point 40, in the Applicants' response to Hearing Action Points due at Deadline 1 (REP-037). Further detail on the site selection for the mitigation and biodiversity benefit areas is being submitted at Deadline 2.</p> <p>The Applicants confirmed at Issue Specific Hearing 1 that engagement with BAE is ongoing in order to agree a strategy for a bird strike management plan (see paragraphs 60 - 64 of The Applicants' Hearing Summary of Issue Specific Hearing 1 – Day 2 (REP1-035)). The Applicants also provided responses in relation to this matter at ISH1_40 of The Applicants' response to Hearing Action Points due at Deadline 1 (REP1-037) and provided further detail in relation to engagement with both BAE and Blackpool Airport in the Deadline 1 Cover letter (REP1-001). At deadline 2, the Applicants have submitted the Strategy for Wildlife Hazard Management Plan (S_D2_14) which has been shared with BAE and Blackpool Airport as part of the Applicants ongoing engagement with those bodies as explained in the Applicants responses to Blackpool Airport and BAE written representations in The Applicants Responses to Written Representations from Statutory Consultees and other organisations (S-D2_3). The Applicants will continue to</p>

Reference	Written Representation Comment	Applicants' response
		actively engage with BAE and Blackpool Airport to resolve their concerns in relation to bird strike.
REP1-107.07	<p>Cumulative Impact Existing projects already cover 225 acres with nuclear and solar energy within the Parish – larger than the villages of Newton with Scales and Clifton together. In addition there are two proposed solar farms making another 249 acres. One of these, 24/0541 on the Fylde Council website “Installation of a 32 hectare solar farm with associated infrastructure including: series of solar photovoltaic arrays, switch rooms, substations, inverters power stations, fencing, pole mounted CCTV cameras, access tracks and landscaping with biodiversity measures” on the land west of Parrox Lane, Newton with Clifton, is adjacent to the proposed M and M substations. Previously rejected because of the poor access for hundreds of HGV’s down Parrox Lane, it now proposes an access route for construction which runs along Lower Lane, Freckleton (which is also proposed for the M&amp;M traffic) and then onto a bridleway, public right of way, leading onto a track which goes across the cabling route and crosses a Main River feeding the Ribble RAMSAR site. The applicants’ proposal clearly avoids these proposed solar farms but given they are likely to be considered by Fylde Borough Council Planning prior to the end of this DCO examination it is unclear how any conflicts in access would be addressed. These proposals in total would result in a non-stop sea of solar panels, substations and cabling route on the greenbelt and best and most valued farmland between Newton with Scales, Freckleton and Kirkham. It is very clear that there has been no consideration of the cumulative impact of these proposals on the local community</p>	<p>In relation to cumulative effects and assessment the Applicants refer to their response to Relevant Representations Part 1 - Introduction and thematic responses (PDA-005) and Specific Hearing Action Point 29 which can be found in The Applicants' response to Hearing Action Points due at Deadline 1 - Rev F01 (REP1-037).</p> <p>The Applicants have carried out Cumulative Effects Assessment (CEA) screening and refer to Volume 1, Annex 5.5: Cumulative screening matrix and location plan (REP1-020) The Applicants will be submitting an update vis Review of Cumulative Effects Assessment and In-Combination Assessment at Deadline 2.</p>

Reference	Written Representation Comment	Applicants' response
REP1-107.08	<p>Ecology May birds on the UK red list for birds of conservation concern have been observed on the land scheduled for the substations over the past 5 years, including: lapwing, grey partridge, greenfinch, house martin, marsh warbler, curlew, black tailed godwit, woodcock, dunlin, lesser spotted woodpecker, mistle thrush, herring gull, common cuckoo, swift, yellow wagtail, marsh tits, marsh warbler, skylark, yellowhammers house sparrows and starlings. Other protected species include great crested newts, hedgehogs and pipistrelle bats. Any reduction in the quality of (the permanent) habitat at Newton March, Lytham Moss, Freckleton Marsh and Lea Marsh to discourage birds from visiting it will have a consequential effect on the biodiversity score so it may not be possible to satisfy BNG requirements (admittedly not yet a legal obligation but recommended in policy) and avoid increasing bird strike risk. The proposed habitat can be found on page 56 of APP-106 These points were summarily dismissed as BNG was not a legal requirement despite this being a government intention, that the applicant was seeking to meet it, and would be a legal requirement later this year.</p>	<p>The Applicants have responded to the matter of Ecology in section 2.12 of their Response to Relevant Representations Part 1 – Introduction and thematic responses (PDA-005).</p> <p>In response to submissions made regarding Biodiversity Net Gain, the Applicants are pleased to reconfirm that although the requirement to provide BNG is not a legal requirement it is being provided voluntarily as explained in the Biodiversity Statement (AS-054).</p>
REP1-107.09	<p>Flooding It is unclear that all aspects of the questions posed regarding flooding and drainage have been fully accounted for. Examples of this relate to mitigation of the issues of interrupting the drainage water courses by the build 2 work especially if it is not known exactly what has been done previously and these works lie hidden below ground, which many drains will do, especially on farmland. Much of the land is already prone to flooding.</p>	<p>The Applicants have responded to the matter of flood risk within document The Applicants' Response to Relevant Representations Part 1 - Introduction and thematic responses (PDA-005) at Section 2.16. Discussions are also ongoing with the Lead Local Flood Authority in relation to appropriate Protective Provisions to be included in the DCO and the Applicants are confident that any concerns can be satisfactorily resolved.</p>

Reference	Written Representation Comment	Applicants' response
REP1-107.10	Local economy We welcome the Planning Inspectorate seeking a review of the impact of the proposals on the Fylde rather than the whole North West, taking into account of Fylde being a peninsula. The current approach is too high level and the assessment is not appropriate.	The Applicants have responded to the point raised by the Examining Authority in Annex 5.10 to the Applicants response to Hearing Action Points: ISH1 52 (REP1-046) with a note on effects on local business and tourism.
REP1-107.11	Safety This is a key point - Because of the location of Blackpool Airport, there are only two north / south major arterial roads between Blackpool and St Anne's. One is Clifton Drive to the west of the airport and the other is Queensway to the east of the airport. Both roads become major bottlenecks when planned roadworks are carried out on just one side of the airport, causing long queues of traffic and severe delays. Both these roads will need to be crossed by the cable route. We have not seen any 'emergency vehicle impact statement' in relation to access by Police, Fire, Ambulance and Coastguard emergency vehicles.	<p>The Applicants have assessed the potential impact of the Transmission Assets on emergency services in Volume 3, Chapter 7: Traffic and Transport (APP-108) which considers the Transmission Assets traffic in relation to driver delay, severance, non-motorised user delay, fear and intimidation, road safety and abnormal loads.</p> <p>During construction, when the greatest impacts to the considerations on emergency services will be experience, the Applicants highlight that extensive commitments have been made to minimise disruption. The use of trenchless installation techniques, such as Horizontal Directional Drilling (HDD) to minimise disruption to all A, B and Classified roads (with the exception of Leach Lane) and railways proposed to be crossed by the Transmission Assets (see CoT02, Volume 1, Annex 5.3: Commitments Register (F 1.5.3/F03)). This commitment to the use of trenchless techniques is secured via Requirement 8 (Code of Construction Practice) of Schedules 2A and 2B of the draft DCO (REP1-008). With regard to Leach Lane, the Applicants have committed to maintaining access, with works completed on a 'half / half basis' with traffic to be controlled through the use of temporary traffic management, such as traffic signals. The open cut trenching on Leach Lane is not expected to result in any road closures and vehicular access would always be maintained including for emergency services and for buses.</p> <p>The approach to managing highway crossings is outlined in Section 1.10 of the Outline Construction Traffic Management Plan (OCTMP) (J5/F02).</p> <p>Subject to the grant of the DCO, the Applicants would note that the effects of construction traffic and highway works from Transmission Assets would be managed, monitored and controlled through the development of the detailed CTMPs. In compliance with Requirement 9 in Schedules 2A and 2B of the draft DCO (REP1-008), the detailed CTMPs would need to be agreed with the relevant highway authorities. In approving the detailed CTMPs the relevant highway authorities would apply their statutory duties under</p>

Reference	Written Representation Comment	Applicants' response
		<p>the Traffic Management Act, 2004 to ensure the “expeditious movement of traffic on the authority’s road network” which includes emergency services.</p> <p>The Applicants take safety seriously and have previously responded to this matter relating to BAE Systems Warton comment within document The Applicants' Response to Relevant Representations Part 1 - Introduction and thematic responses (PDA-005), please see paragraphs 2.21.2.4 to 2.21.2.7 and provided further detail in their Deadline 1 Cover letter (REP1-001). In particular the Applicants have responded to issues around birdstrike in their response to Issue Specific Hearing 1 Action Point 40, in the Applicants' response to Hearing Action Points due at Deadline 1 (REP-037). Further detail on the site selection for the mitigation and biodiversity benefit areas is being submitted at Deadline 2.</p> <p>The Applicants confirmed at Issue Specific Hearing 1 that engagement with BAE is ongoing in order to agree a strategy for a bird strike management plan (see paragraphs 60 - 64 of The Applicants' Hearing Summary of Issue Specific Hearing 1 – Day 2 (REP1-035)). The Applicants also provided responses in relation to this matter at ISH1_40 of The Applicants' response to Hearing Action Points due at Deadline 1 (REP1-037) and provided further detail in relation to engagement with both BAE and Blackpool Airport in the Deadline 1 Cover letter (REP1-001). At deadline 2, the Applicants have submitted the Strategy for Wildlife Hazard Management Plan (S_D2_14) which has been shared with BAE and Blackpool Airport as part of the Applicants ongoing engagement with those bodies as explained in the Applicants responses to Blackpool Airport and BAE written representations in The Applicants Responses to Written Representations from Statutory Consultees and other organisations (S-D2_3). The Applicants will continue to actively engage with BAE and Blackpool Airport to resolve their concerns in relation to bird strike.</p>
REP1-107.12	Other issues not properly address for us the stakeholders living in the area. • Impact of increased traffic, including heavy goods vehicles, on pedestrians, motorised wheel chair users, horse riders, and cyclists • Concerns about birdstrike impacting on air safety for local people. T • The failure to agree a transport plan and its impact on traffic accidents and fatalities. . • There are issues with access to	The Applicants note this response. Subject to the grant of the DCO, the Applicants would note that the effects of construction traffic and highway works from Transmission Assets would be managed, monitored and controlled through the development of the detailed CTMPs. In compliance with Requirement 9 of the draft DCO (REP1-008), the detailed CTMPs would need to be agreed with the relevant highway authorities. In approving the detailed CTMPs the relevant highway authorities would apply their

Reference	Written Representation Comment	Applicants' response
	the site with existing roads being single track and designed for light traffic only.	statutory duties under the Traffic Management Act, 2004 to ensure the "expeditious movement of traffic on the authority's road network" which includes emergency services.
REP1-107.13	Traffic and Transport There are already issues with existing road capacity and delays. This includes the M6 access to the Fylde where there are regular accidents and delays. It also includes Preston Road Lytham which prevented some members of the public attending the hearings. The traffic plans are flawed traffic and compromise on safety. In particular t 5km of roads that do not appear able to take this level of traffic either in terms of road quality or sharing with pedestrians etc. These include "moss roads" which LCC has a specific policy for and which are not suitable for heavy vehicles. There was not an opportunity to examine this in depth at the Issue Specific Hearing.	The Applicants have responded to the matter of traffic and transport at Section 2.32 within document The Applicants' Response to Relevant Representations Part 1 - Introduction and thematic responses (PDA-005).

## 2.6 Anne Broughton (REP1-108)

**Table 2.6: REP1-108 – Anne Broughton**

Reference	Written Representation Comment	Applicants' response
REP1-108.01	I am a long term local resident of the Fylde in the parish of Treales, Roseacre & Wharles and whilst my property is not immediately affected by the plans for transmission cables, my lifestyle, health and wellbeing will be significantly impacted by the loss of amenity that the Fylde currently offers.	The Applicants note this response and would like to reassure Ms Broughton that any impact on amenity will be limited in scope and time and that once constructed the Transmission Assets are unlikely to have any impact on amenity.

Reference	Written Representation Comment	Applicants' response
REP1-108.02	<p>I am a keen cyclist, I along with a few of friends ride the lanes of the Fylde regularly - weekly, for our physical and mental health, to enjoy the company, the fresh air, countryside, rural lanes all that the Fylde provides and the lanes that will not be directly impacted by the planned works, they will suffer from diversions that will be necessary and from displaced traffic. This area is also used by many cycle clubs - British cycle club, Blackpool Clarion cycle club, Blackpool Youth cycle Association, Preston Cycle club, Red Rose cycle club Cleveleys Cycle club (with over 140 members). The groups regularly use the rural lanes around the proposed works as part of our training routes and for social riding. The Fylde countryside is used by thousands of cyclists every week, throughout the year. The routes around in and around the Fylde are very popular as they are the gateway from the Fylde Coast to the hills of the Forest of Bowland and beyond. This can be evidenced by accessing Strava, (see below for an extract of Strava information) a website and mobile app used to track athletic activity via GPS. Its headquarters are located in San Francisco, California. The most popular activities tracked using the software are cycling and running which will show a portion of the very high level of athletic activity on these rural roads. The number of cycling clubs who use these roads number over 30 with thousands of members. Again, this can be evidenced by accessing the websites and Facebook pages of these clubs who post regular daily rides. For example, Blackpool Clarion Club has over 650 members and run daily rides across the Fylde coast and along the proposes route. There are several Charitable rides that use the amenity of the area notable the Manchester to Blackpool cycle ride which is new held twice a year and has 7,000 riders. The amenity value of the area cannot be underestimated, and the</p>	<p>The Applicants are aware of concerns relating to the interaction of cyclists and construction vehicles and consider that both uses of the road network can be accommodated. Volume 3, Chapter 7: Traffic and Transport (APP-108) of the Environmental Statement assessment has considered the potential impacts of the construction of the Transmission Assets and increases in traffic flows as a result of construction traffic upon non-motorised user delay and fear and intimidation (non-motorised user amenity) for users of the local and strategic road networks. The assessment concludes (with the application of the identified mitigation measures) that the residual effects would not be significant in Environmental Impact Assessment (EIA) terms.</p> <p>The Applicants note that an access strategy has been developed that seeks to reduce the requirement for construction traffic to travel via local roads and instead aims to prioritise the use of motorways and A and B roads for the movement of construction traffic where possible. To facilitate this strategy the Applicants have made extensive commitments to the use of temporary haul roads through the cable corridor, thereby reducing the requirement for construction traffic to avoid travel via the local road network.</p>

Reference	Written Representation Comment	Applicants' response
	<p>parish and other villages and the rural road network are promoted by Fylde Borough Council to encourage tourism and leisure within the Fylde Coast. This area also forms part of the Lancashire Cycle Link.</p> <p>The proposed applications will necessitate the introduction of unacceptable levels of HGV and other commercial traffic associated with heavy industrial activity onto our rural lanes. Vulnerable road users like cyclists, runners, walkers and horse riders will be put at serious risk and inevitably there will be accidents</p>	
REP1-108.03	<p>These rural roads are dangerous enough with the levels of traffic that already use them. They are susceptible to flooding which has been demonstrated all too well this winter. Mud on the roads is a major concern already and has been highlighted in local newsletters by the police. This is caused by farm and other heavy traffic driving on the grass verges, which causes mud to spray onto the roads which is very dangerous for cyclists and all road users.</p>	<p>The Applicants recognise concerns relating to mud on the road network Section 1.7 of the Outline Construction Traffic Management Plan (OCTMP) (J5/F02) includes mitigation measures that there is a risk that vehicles will deposit mud and debris on the highway i.e. in the vicinity of construction site accesses at the onshore substations, wheel cleaning facilities will be provided. The condition of the adjacent highway will be monitored and if mud or debris is found to be present, measures such as road sweeping will be put in place by the Contractors to secure its removal with minimal delay.</p> <p>Following engagement with the local highway authority (Lancashire County Council), additional measures in relation to control of material on the highway have been added to Section 1.4 of an updated version of the oCTMP submitted at Deadline 2 (J5/F02). These include regular inspections of the public highway in the vicinity of the active site accesses and road sweepers on call to clear any detritus and other material from the public highway.</p> <p>The requirement to produce detailed CTMP(s) in accordance with the OCTMP and agree this with the relevant highway authority is secured by Requirement 9 of Schedules 2A and 2B the draft DCO (REP1-008).</p>
REP1-108.04	<p>It is certain that HGVs will use and ultimately destroy the verges. They are there for a very important purpose; to protect wildlife, to stop flooding from fields reaching the roads, allow walkers to move off the road when traffic is approaching and to enhance the beauty of the rural area.</p>	<p>The Applicants note the concerns raised. Section 1.6 of the Outline Construction Traffic Management Plan (OCTMP) (J5/F02) details that the access locations are identified in the Outline Highway Access Management Plan (document reference J8). Working areas will be designed to enable plant, materials and waste to be loaded/unloaded, areas will be designed where practicable to enable vehicles to enter</p>

Reference	Written Representation Comment	Applicants' response
	<p>The roads will therefore become more dangerous for all users. How can it therefore be that these lanes are possibly suitable and safe for heavy HGV traffic associated with major industrial activity. No traffic management plan can mitigate all the risks of bringing an industrial process into the heart of the countryside on unsuitable roads. The amenity of this area will be lost to all the thousands of people who currently cycle and ride and walk it.</p>	<p>and exit in forward gear. All site accesses will be designed to eliminate the risk of vehicles queueing back onto the highway by providing sufficient length and width close to the adjacent highway, which is appropriate to the types of vehicles anticipated to use the access. Parking on and around construction sites will avoid parking on verges or highways, to avoid vehicles idling and waiting for access and to defer construction workers from driving to site unnecessarily</p> <p>Following engagement with the local highway authority (Lancashire County Council), additional measures in relation to narrow road widths (i.e. 'last leg' links) have been identified and included in Section 1.9 of an updated version of the oCTMP submitted at Deadline 2 (J5/F02).</p> <p>The requirement to produce detailed CTMP(s) in accordance with the OCTMP and agree this with the relevant highway authority is secured by Requirement 9 of Schedules 2A and 2B the draft DCO (REP1-008).</p>
REP1-108.05	<p>This destruction of the Fylde, the significant disturbance to the lives of the many who live and use the Fylde is not necessary, an alternative route has been identified that is much less impactful, which merits the most serious consideration. This route would be the obvious choice identified by the people of Lancashire and largely supported by the people of Lancashire if the M&amp;M consultations had been meaningful consultations. The route is significantly shorter and therefore cheaper (estimated at approx £480m cheaper at 2012 prices), the Secretary of State has a responsibility, a duty to protect consumers under the Electricity Act of 1989, so cost is a material factor, as the unnecessary costs will be passed onto consumers through future electricity bills</p>	<p>As noted above at section 1.1 Introduction, a number of responses have provided comments on site selection and the assessment of alternatives including suggesting that the Point of Interconnection for the Transmission Assets should be at or via Stanah. The Applicants provided an initial response on site selection and the assessment of alternatives at section 2.31.1 of The Applicants' Response to Relevant Representations Part 1 - Introduction and thematic responses (PDA-005). Following discussions relating to site selection and alternatives at Issue Specific Hearing 1 and in response to a number of the Examining Authority's Hearing Action Points, the Applicants provided a detailed technical response on these matters including explaining why the proposed alternative connection to Stanah is not a viable alternative. This was provided at Deadline 1 in Annex 5.2 to the Applicants response to Hearing Action Points: ISH1 6, 8, 9, 19, 26 &amp; 28 - Rev F01 (REP1-039).</p>

## 2.7 Brian Harrop (REP1-117)

**Table 2.7: REP1-117 – Brian Harrop**

Reference	Written Representation Comment	Applicants' response
REP1-117.01	<p>Connection to the National Grid. During the preliminary hearings the Applicants stated they had no choice in deciding upon Penwortham as the connection point. This seemed an area of contention with legal representatives of Parish councils (and a query from the Chair). There seemed to be issues with the Grid's use of the words "preferred" route and that the Applicants "substantially" had no decision. I raised this issue with the National Grid back in December - via a Freedom of Information request - and received the reply below. It seems to me that the Applicants are correct in that the Grid has the responsibility to decide on the connection point.</p> <p>"Thank you for your message. As part of our legal obligation to facilitate new connections to the network, it is our responsibility to identify the most suitable connection point based on factors such as location, project requirements, network resilience, cost, environment and the capacity of our existing infrastructure. Penwortham and Stanah substations have different roles within our electricity network and for Morgan and Morecambe's proposed projects, Stanah is currently not best placed to accommodate these connections. Stanah is a small substation that has primarily been designed to step down the power from higher voltage transmission lines to lower voltage lines, so that it is ready to be distributed to</p>	<p>The Applicants note the submission from Mr Harrop and are grateful for the clarity provided by the submission of the National Grid response from December 2024 via Freedom of Information request.</p> <p>As noted above at section 1.1 Introduction, a number of responses have provided comments on site selection and the assessment of alternatives including suggesting that the Point of Interconnection for the Transmission Assets should be at or via Stanah. The Applicants provided an initial response on site selection and the assessment of alternatives at section 2.31.1 of The Applicants' Response to Relevant Representations Part 1 - Introduction and thematic responses (PDA-005). Following discussions relating to site selection and alternatives at Issue Specific Hearing 1 and in response to a number of the Examining Authority's Hearing Action Points, the Applicants provided a detailed technical response on these matters including explaining why the proposed alternative connection to Stanah is not a viable alternative. This was provided at Deadline 1 in Annex 5.2 to the Applicants response to Hearing Action Points: ISH1 6, 8, 9, 19, 26 &amp; 28 - Rev F01 (REP1-039).</p>

Reference	Written Representation Comment	Applicants' response
	consumers. Penwortham is much larger in comparison and is part of our high-voltage transmission network, which is able to connect power generation sources, such as wind farms, to the network. Unlike Stanah, Penwortham substation currently has the flexibility and capacity on-site to facilitate Morgan and Morecambe's connection requests.	

## 2.8 Christine Marshall (REP1-121)

**Table 2.8: REP1-121 – Christine Marshall**

Reference	Written Representation Comment	Applicants' response
REP1-121.01	I believe that the application for the Morgan and Morecambe windfarm should be refused as there has been a flawed consultation process. There are many people in the area that are not aware of these plans and those who are aware find the plans lack detail and are difficult to interpret	<p>The Applicants take consultation and ongoing communications with the community seriously. A number of non-statutory consultations, alongside statutory consultations in accordance with the Planning Act 2008. A range of consultation events were held in the vicinity of the proposed Transmission Assets, including online events, exhibitions and pop-up events between November and December 2022, April and June 2023, and October and December 2023. These events were advertised in local newspapers, on local radio, on posters in the local area, through postcards and newsletters distributed through the local area and on social media. Further details can be found in the Consultation Report (APP-170).</p> <p>The Applicants have responded to concerns in relation to Consultation in Section 2.2.2 of their Response to Relevant Representations Part 1 -</p>

Reference	Written Representation Comment	Applicants' response
		Introduction and thematic responses (PDA-005) in particular noting that the Acceptance Checklist (s55) (PD-003) where the Planning Inspectorate confirms in relation to adequacy of consultation it "is satisfied that the Applicants have complied with their statutory obligations."
REP1-121.02	It seems that the applicants have not done their homework thoroughly which you will become aware of when reading all the submissions and in particular have refused to consider a cheaper and more viable route. It seems that the route chosen by them has been dictated to them and they have had closed minds when presented with a perfectly reasonable alternative route which would save huge amounts of money. It is perfectly clear that causing so much destruction to greenbelt land ,peoples homes and the general environment is entirely unnecessary and the Examining Authority need to make sure the alternative route suggested is thoroughly looked into before this application proceeds. It is clear that Morgan and Morecambe's application has been submitted without due care and in haste and not showing enough respect to those who would be affected. In my opinion they have not done their homework thoroughly enough. Must do better	As noted above at section 1.1 Introduction, a number of responses have provided comments on site selection and the assessment of alternatives including suggesting that the Point of Interconnection for the Transmission Assets should be at or via Stanah. The Applicants provided an initial response on site selection and the assessment of alternatives at section 2.31.1 of The Applicants' Response to Relevant Representations Part 1 - Introduction and thematic responses (PDA-005). Following discussions relating to site selection and alternatives at Issue Specific Hearing 1 and in response to a number of the Examining Authority's Hearing Action Points, the Applicants provided a detailed technical response on these matters including explaining why the proposed alternative connection to Stanah is not a viable alternative. This was provided at Deadline 1 in Annex 5.2 to the Applicants response to Hearing Action Points: ISH1 6, 8, 9, 19, 26 & 28 - Rev F01 (REP1-039).

## 2.9 Christopher John Nebard (REP1-122)

**Table 2.9: REP1-122 – Christopher John Nebard**

Reference	Written Representation Comment	Applicants' response
REP1-122.01	It is now clear that a much shorter, cheaper, more speedily available, less damaging alternative could connect to Penwortham via Stanah (an existing Enterprise Zone) using an existing National Grid line. This is already 400KV capable, with cost savings estimated at £903 million at current prices. This alternative would use a designated brownfield site, create jobs in one of the most deprived areas of Lancashire in future energy production, and yet the Applicants dismiss its feasibility, opting for complex solutions. The Applicants avoid responsibility for landfall and connection decisions via Stanah, deferring to National Grid, and hence they have opted for a conflicted, all new, cross-Greenbelt route	As noted above at section 1.1 Introduction, a number of responses have provided comments on site selection and the assessment of alternatives including suggesting that the Point of Interconnection for the Transmission Assets should be at or via Stanah. The Applicants provided an initial response on site selection and the assessment of alternatives at section 2.31.1 of The Applicants' Response to Relevant Representations Part 1 - Introduction and thematic responses (PDA-005). Following discussions relating to site selection and alternatives at Issue Specific Hearing 1 and in response to a number of the Examining Authority's Hearing Action Points, the Applicants provided a detailed technical response on these matters including explaining why the proposed alternative connection to Stanah is not a viable alternative. This was provided at Deadline 1 in Annex 5.2 to the Applicants response to Hearing Action Points: ISH1 6, 8, 9, 19, 26 & 28 - Rev F01 (REP1-039).
REP1-122.02	Concerns arise over site selection, extended construction periods, and lack of benefits to local communities. Consultation efforts are insufficient, leading to stakeholder frustration. Agricultural impacts include prolonged and permanent land loss and enormous disruption. Beach access at St Anne's faces likely closures without mitigation plans. Air safety concerns remain unresolved due to poor engagement with BAE Systems. By extension, national security issues would arise. Emergency access for blue light vehicles during the construction period would create a danger to residents.	We thank Mr Nebard for taking the time to raise the issues he has and can confirm that the following submissions provide responses in detail: <ol style="list-style-type: none"> <li>1. The Applicants' Response to Relevant Representations Part 1 - Introduction and thematic responses (PDA-005).</li> <li>2. The Applicants' response to Hearing Action Points due at Deadline 1 - Rev F01 (REP1-037); and</li> <li>3. The Applicants refer to their response to Relevant Representations Part 1 - Introduction and thematic responses (PDA-005). For a more technical response see document Annex 5.2 to the Applicants response to Hearing Action Points: ISH1 6, 8, 9, 19, 26 &amp; 28 - Rev F01 (REP1-039).</li> </ol>

Reference	Written Representation Comment	Applicants' response
		The Applicants would also invite Mr Nebard to review responses provided to other parties in this document which touch on his matters of concern.
REP1-122.03	Community benefits remain undefined despite available government guidance. The human cost and cumulative impacts of the proposed substations, Transmission Assets and cabling route, lack adequate assessment. Biodiversity concerns persist, with protected bird species inhabiting affected areas. Temporary land use remains unaccounted for in biodiversity net gain (BNG) calculations	<p>In relation to community benefits, following discussion in Issue Specific Hearing 1 and in response to Examining Authority's Hearing Action Point ISH1_31 the Applicants have updated their Statement of Reasons with information on local community benefits. The Applicants will also be undertaking further engagement on community benefits with local stakeholders as discussed in The Applicants' response to Hearing Action Points due at Deadline 1 - Rev F01 (REP1-037).</p> <p>The Applicants confirmed at Issue Specific Hearing 1 that there is no legal requirement for the Transmission Assets to provide BNG and as such, it is being provided on a voluntary basis. (See paragraph 86 of The Applicants' Hearing Summary of Issue Specific Hearing 1 – Day 2 (REP1-035).) The Applicants Onshore Biodiversity Benefit Statement (J11/F03) explains the approach taken by the Applicants and confirms that the calculation undertaken for biodiversity benefit utilises the latest Defra Biodiversity Metric (version 4.1) in line with guidance and NPS EN-1.</p>
REP1-122.04	All of these issues are worsened by the refusal of the Applicants to consider any alignment of their works leading to a potential 10 year period of disruption. Ultimately, the alternative route offers a more direct, speedier, cost-efficient, and environmentally viable solution that has been ignored by the Applicants. On such grounds, and with the knowledge that it does exist, the alternative route and point of connection via Stanah must surely be considered against the Applicants' current proposal. Whether or not previous reasons (for the Stanah alternative being ignored) were as a result of Electricity Systems Operator, National Grid, Holistic Network Design, or Applicant decisions, for this to have been omitted in the past is	<p>The Applicants explained their approach to construction scenarios and coordination between Morgan OWL and Morecambe OWL at Issue Specific Hearing 1 (see in particular paragraphs 11 - 34 of The Applicants' Hearing Summary of Issue Specific Hearing 1 – Day 2 (REP1-035)). Following the hearings, the Applicants provided a detailed technical response to these points within Annex 5.2 to the Applicants response to Hearing Action Points: ISH1 6, 8, 9, 19, 26 &amp; 28 - Rev F01 (REP1-039). Section 7 of REP1-039 sets out how Morgan OWL and Morecambe OWL will continue to work together post consent to deliver the two projects comprised within the Transmission Assets. Section 8 of REP1-039 clearly explains why flexibility must be retained within the draft DCO (REP1-008) to allow for the projects to be constructed in different ways and why Morgan OWL and Morecambe OWL cannot commit to concurrent construction within the draft DCO.</p> <p>With regards to the suggested alternative route, the Applicants refer Mr Nebard to REP1-122.01 above.</p>

Reference	Written Representation Comment	Applicants' response
	not a reason, now, for the NSIP/Development Consent Order process to continue to ignore it or for the alternative not to be fully and properly considered.	

## 2.10 Daryl Charles Bentley (REP1-127)

**Table 2.10: REP1-127 –Daryl Charles Bentley**

Reference	Written Representation Comment	Applicants' response
REP1-127.01	We consider that a much shorter, cheaper, less damaging alternative can connect to Penwortham via Stanah, using an existing National Grid line, already 400KVcapable, with cost savings estimated at £903mat current prices. The alternative would use a designated brownfield site and create jobs in one of the most deprived areas of Lancashire in future energy intensive, green hydrogen production, yet applicants dismiss its feasibility, opting for complex solutions. The applicants avoid responsibility for landfall decisions, deferring to National Grid and hence they have opted for a conflicted, all new, cross-Greenbelt route. Concerns arise over site selection, extended construction periods, and lack of benefits to local communities.	As noted above at section 1.1 Introduction, a number of responses have provided comments on site selection and the assessment of alternatives including suggesting that the Point of Interconnection for the Transmission Assets should be at or via Stanah. The Applicants provided an initial response on site selection and the assessment of alternatives at section 2.31.1 of The Applicants' Response to Relevant Representations Part 1 - Introduction and thematic responses (PDA-005). Following discussions relating to site selection and alternatives at Issue Specific Hearing 1 and in response to a number of the Examining Authority's Hearing Action Points, the Applicants provided a detailed technical response on these matters including explaining why the proposed alternative connection to Stanah is not a viable alternative. This was provided at Deadline 1 in Annex 5.2 to the Applicants response to Hearing Action Points: ISH1 6, 8, 9, 19, 26 & 28 - Rev F01 (REP1-039).
REP1-127.02	Consultation efforts are insufficient, leading to stakeholder frustration.	The Applicants take consultation and ongoing communications with the community seriously. A number of non-statutory consultations, alongside

Reference	Written Representation Comment	Applicants' response
		<p>statutory consultations in accordance with the Planning Act 2008. A range of consultation events were held in the vicinity of the proposed Transmission Assets, including online events, exhibitions and pop-up events between November and December 2022, April and June 2023, and October and December 2023. These events were advertised in local newspapers, on local radio, on posters in the local area, through postcards and newsletters distributed through the local area and on social media. Further details can be found in the Consultation Report (APP-170).</p> <p>The Applicants have responded to concerns in relation to Consultation in Section 2.2.2 of their Response to Relevant Representations Part 1 - Introduction and thematic responses (PDA-005) in particular noting that the Acceptance Checklist (s55) (PD-003) where the Planning Inspectorate confirms in relation to adequacy of consultation it "is satisfied that the Applicants have complied with their statutory obligations."</p>
REP1-127.03	Agricultural impacts include prolonged and permanent land loss and disruption.	<p>The Applicants have responded to this comment within Section 2.3 of document The Applicants' Response to Relevant Representations Part 1 - Introduction and thematic responses (PDA-005). The Applicants in their response to Issue Specific Hearing Action Point 46 confirmed that they are aware that there are different types of agricultural and rural business across the Transmission Assets order limits, including dairy, beef, mixed livestock, arable, mixed and equine. These businesses all have slightly differing farming calendars throughout the seasons and therefore the use and timings of activities on the land differ.</p>
REP1-127.04	Beach access at St Anne's faces likely closures without mitigation plans.	<p>The Applicants previously addressed concerns relating to beach access in section 2.5 of The Applicants' Response to Relevant Representations Part 1 - Introduction and thematic responses (PDA-005). Following the discussions at the Hearings, and in</p>

Reference	Written Representation Comment	Applicants' response
		<p>response to Hearing Action Points, the Applicants provided further detailed technical clarifications in relation to beach access in Annex 5.3 to the Applicants response to Hearing Action Points: ISH1 13, 14, 16, 17 (REP1-040).</p> <p>Further details of the public access to the beach during construction is set out in The Outline Open Space Management Plan which is at Appendix A of the Outline Public Rights of Way (PRoW) Management Plan (AS-048). This sets out the discrete working areas that will be subject to access management during construction works.</p>
REP1-127.05	Air safety concerns remain unresolved due to poor engagement with BAE Systems.	The Applicants refer to their response to Relevant Representations Part 1 - Introduction and thematic responses (PDA-005) and provided further detail in Deadline 1 Cover letter (REP1-001).
REP1-127.06	Emergency access for blue light vehicles during the construction period would create a danger to residents. The roads in our area already suffer from major delays when any road works are set up, adding to traffic numbers and the need for temporary lights will cause our area to become gridlocked.	<p>The Applicants have assessed the potential impact of the Transmission Assets on emergency services in Volume 3, Chapter 7: Traffic and Transport (APP-108) which considers the Transmission Assets traffic in relation to driver delay, severance, non-motorised user delay, fear and intimidation, road safety and abnormal loads.</p> <p>During construction, when the greatest impacts to the considerations on emergency services will be experience, the Applicants highlight that extensive commitments have been made to minimise disruption. The use of trenchless installation techniques, such as Horizontal Directional Drilling (HDD) to minimise disruption to all A, B and Classified roads (with the exception of Leach Lane) and railways proposed to be crossed by the Transmission Assets (see CoT02, Volume 1, Annex 5.3: Commitments Register (F 1.5.3/F03)). This commitment to the use of trenchless techniques is secured via Requirement 8 (Code of Construction Practice) of Schedules 2A and 2B of the draft DCO (REP1-008). With regard to Leach Lane, the Applicants have committed to maintaining access, with works completed on a 'half / half basis' with traffic to be controlled through the use of temporary traffic management, such as traffic signals. The open cut trenching on Leach Lane is not expected to result in any road closures and vehicular access would always be maintained including for emergency services and for buses.</p>

Reference	Written Representation Comment	Applicants' response
		<p>The approach to managing highway crossings is outlined in Section 1.10 of the Outline Construction Traffic Management Plan (OCTMP) (J5/F02).</p> <p>Subject to the grant of the DCO, the Applicants would note that the effects of construction traffic and highway works from Transmission Assets would be managed, monitored and controlled through the development of the detailed CTMPs. In compliance with Requirement 9 in Schedules 2A and 2B, the detailed CTMPs would need to be agreed with the relevant highway authorities. In approving the detailed CTMPs the relevant highway authorities would apply their statutory duties under the Traffic Management Act, 2004 to ensure the “expeditious movement of traffic on the authority’s road network” which includes emergency services.</p>
REP1-127.07	Community benefits remain undefined despite available government guidance. Existing and proposed energy projects threaten to overwhelm greenbelt areas. The cumulative impacts of substations, cabling, and solar farms lack adequate assessment.	<p>The Applicants regret that due to the timetabling of the Government’s guidance they were unable to engage in the dialogue that TASC were seeking. In relation to community benefits, following discussion in Issue Specific Hearing 1 and in response to Examining Authority’s Hearing Action Point ISH1_31 the Applicants have updated their Statement of Reasons with information on local community benefits. As confirmed by the Applicants in Issue Specific Hearing 1 they will be providing community benefits in line with Government guidance (see page 11 of The Applicants' Hearing Summary of the Issue Specific Hearing 1: Day 2 (REP1-035)) The Applicants will also be undertaking further engagement on community benefits with local stakeholders as discussed in The Applicants' response to Hearing Action Points due at Deadline 1 - Rev F01 (REP1-037)</p> <p>The Applicants have responded to the matter of cumulative effects in response to Issue Specific Hearing Action Point 29 which can be found in The Applicants' response to Hearing Action Points due at Deadline 1 - Rev F01 (REP1-037). The Applicants have carried out Cumulative Effects Assessment (CEA) screening and refer to Volume 1, Annex 5.5: Cumulative screening matrix and location plan (REP1-020) The Applicants will be submitting an</p>

Reference	Written Representation Comment	Applicants' response
		update vis Review of Cumulative Effects Assessment and In-Combination Assessment at Deadline 2 (S_D2_10).
REP1-127.08	Biodiversity concerns persist, with protected bird species inhabiting affected areas. All of these issues are worsened by the refusal of the applicants to consider any alignment of their works leading to a potential 10 year period of disruption. Ultimately, the alternative route offers a more direct, cost-efficient, and environmentally viable solution that has been ignored by applicants.	The Applicants have responded to this comment within Section 2.12 of document The Applicants' Response to Relevant Representations Part 1 - Introduction and thematic responses (PDA-005). In relation to the site selection matter the Applicants refer to their response to Hearing Action Points: ISH1 6, 8, 9, 19, 26 & 28 - Rev F01 (REP1-039).

## 2.11 David Barlow (REP1-129)

**Table 2.11: REP1-129 – David Barlow**

Reference	Written Representation Comment	Applicants' response
REP1-129.01	I have made a previous comment regarding the using of lower lane for access to the proposed Morecambe substation construction, however this is a more personal comment regarding my circumstances and treatment throughout the process to date, together with some comments and observational questions arising from the preliminary hearing s that started on the 29th April. I live at XXXXX opposite the proposed Morecambe substation.	<p>Given the nature of Mr Barlow's concerns the Applicants will seek to engage with Mr Barlow directly in relation to the more personal and sensitive issues raised.</p> <p>The health, safety and wellbeing of those who might be impacted in some way by the Transmission Assets is a serious matter for the Applicants who deeply regret that Mr Barlow feels as he does about the Applicants and Transmission Assets. The Applicants remain open to discussion with through the Examination with Mr Barlow, and indeed any other persons who share his concerns.</p>

Reference	Written Representation Comment	Applicants' response
REP1-129.02	<p>The applicant has no regard for the Human Health Issues they have caused no continue to cause, examination library appendix 35 is simply in my opinion a set of 109 pages of a generic copy and paste exercise. I am of the opinion from my treatment so far that my issues and circumstances are in no way related to the process of whether the applicants (whoever they may be, I don't think anyone really knows or sure yet other than it will not be BP) application is successful or not. Or not, because the applicant as deemed my house worthless from the minute they brought this scheme into the public domain, they have ruined my life and my family's life right now no they intend to ruin our lives for the next 11 years of construction and up to 35 years of service through to decommissioning. Well I am XXXXX this year so will be about XXXX efore I can begin to get my life back into order.</p> <p>So could somebody please explain why I am not part of the application process. After 50 years of paying into the system though numerous different taxes especially by being an employer for the last 40 years, do I not deserve to be part of the decision processor are myself and my family just as worthless as my property. Am I deemed by the applicants and the examining authorities process not worthy of any consideration, empathy, concern, duty of care, these people are putting me through. Am I not worthy of being included in any blight or other compensation scheme for the trauma we have been put through, because the applicant never recognised or cared</p>	

Reference	Written Representation Comment	Applicants' response
	<p>about how they have affected our lives. They want to use our beautiful countryside, greenbelt and our fragile lower to provide access to a humongous structure on our doorstep and have no concern for our safety whatsoever. My family, along with many other families love to walk down and indeed need to in order to access our homes. The applicants have no concern about our safety, if my daughter or any other parents children died on due to the heavy traffic they want to burden us with, they wouldn't be bothered, why, because they are shareholders in a company that doesn't even reside in the UK. Allowing Denmark to pillage our countryside in order to protect their own countryside in the pursuit of our taxpayers subsidies is not making us a world leader and job creator in renewable energy, it does not even create energy security, just short term determined energy prices.I have just returned from Copenhagen and they cruelly brag about not allowing renewable energy to encroach on their countryside and community land, yet we actually consider allowing them to do it on ours.</p> <p>I do not deserve to be treated in this way, I do not believe the EXA will allow this to continue, I do get the impression that the EXA are compassionate and that we are going to receive a fair hearing. I will not allow the applicant ruin my home and my life, I will protect my family from them and I will fight my corner to the very end</p>	

Reference	Written Representation Comment	Applicants' response
REP1-129.03	<p>These are my bullet points from the last meeting.</p> <ol style="list-style-type: none"> <li>1. I did stand up and make a comment about the dangers of lower lane, the applicant didn't really answer my question he just said the road is wide enough for two vehicles to pass. What he failed to mention is with no footpaths what happens if a pedestrian happens to be at the same passing point. This could have grave consequences and needs to be given deep consideration.</li> <li>2. Having noticed a distinct difference in the attitude or mitigation regarding bird strikes between BAe and Blackpool airport, where you would assume they would be singing of the same hymn sheet, can I ask the question, has there been any form of business collusion between the applicant and Blackpool airport either Pre, Present or possibly Post to the DCO process.</li> <li>3. Can I please ask the question, who will actually end up owning these wind farms and should detail of their future contracts with the UK not be available to the public and EXA.</li> <li>4. Flooding issues need to be resolved around the drainage from the substation sites. My question was not answered when I asked about the flooding behind my property from the single dyke that takes all the water from the substation sites to the Ribble estuary at bunker street. There are some serious flooding issues on Lower Lane on both sides of the A584.</li> </ol>	<p>The Applicants thank Mr Barlow for taking the time to attend hearings and provide his notes. We have responded to his numbered points as follows:</p> <ol style="list-style-type: none"> <li>1. The Applicants note the concerns regarding Lower Lane. However, the Applicants can confirm that HGV traffic is not proposed to travel down Lower Lane. HGV routes are illustrated on Figure 7.1 of Volume 1, Figures – Part 4 of 7 of the ES (APP-134). This shows that HGV traffic will only use the A583 or A584 to access the construction for the onshore substations. Work Number 23B of the Works Plans – Onshore and Intertidal Part 2 of 2 (AS-017) illustrates a permanent operational access to be taken to the Morgan Offshore Windfarm onshore substation via Lower Lane. Section 3.15.7 of Volume 1, Chapter 3: Project Description of the ES (F1.3/F03) states that this operational access will be used for routine visits by cars and light goods vehicles only and will facilitate safe access during normal operations. Volume 3, Chapter 7: Traffic and Transport (APP-108) assesses the potential impacts of the Transmission Assets traffic in relation to driver delay, severance, non-motorised user delay, fear and intimidation, road safety and abnormal loads. The assessment concludes (with the application of the mitigation measures) that the residual effects upon all road users (including pedestrians) would not be significant in Environmental Impact Assessment (EIA) terms.</li> <li>2. The Applicants can confirm that there has been no business collusion between the Applicants and Blackpool Airport. It was stated during Issue Specific Hearing 1 (REP1-114) that the Applicants and the Airport have been in detailed discussions and negotiations regarding the works on the Airport's operational land for many months. The Airport noted that whilst its key concerns, as outlined in its relevant representations, are for the most part likely to be addressed through the Cooperation Agreement, there are certain issues on which the Airport may require further information and/or which may not be able to be addressed through the Cooperation</li> </ol>

Reference	Written Representation Comment	Applicants' response
	<p>5. When will the applicants produce a scaled down model to let the community of Freckleton see exactly what these substations are going to look like. The applicant appears to be withholding as much information as possible from the community in order to reduce the amount of objections. Unfortunately for my community the applicant has created a situation enabling the public to unwittingly sleepwalk through the process</p>	<p>Agreement, and so it reserved its position in relation to such matters. This includes bird strike and potential bird strike mitigation.</p> <p>3. Developers (such as the Applicants) construct the necessary transmission assets, with the completed transmission assets being transferred to an Offshore Electricity Transmission (OFTO) appointed through Ofgem's 1 tender process at a price set by the authority following a costs assessment, based on the costs that ought to have been incurred: therefore, for transitional projects, the role of the OFTO is to finance, own and operate an asset that has been or will be constructed by the developer. More details are available via Ofgem.</p> <p>4. The Applicants refer to their response to Relevant Representations Part 1 - Introduction and thematic responses (PDA-005). Regardless, the Transmission Assets have committed (see CoT11 of Volume 1, Annex 5.3: Commitments register of the ES (document reference APP-037)) to preparation of detailed Operational Drainage Management Plans. An Outline Operational Drainage Management Plan (APP-215) for the substation sites has been prepared and submitted with the application for development consent. The Plan will include measures to ensure that existing land drainage is reinstated and/or maintained. This will include measures to limit discharge rates and attenuate flows to maintain greenfield runoff rates at the onshore substations. It will also include measures to control surface water runoff, including measures to prevent flooding of the working areas or offsite and to ensure any runoff is treated appropriately. Detailed Operational Drainage Management Plan(s) will be developed in accordance with the Outline Operational Drainage Management Plan and in line with the latest relevant drainage guidance notes in consultation with the Environment Agency and the Lead Local Flood Authority (Lancashire County Council). This is secured via Requirement 20 of Schedules 2A and 2B of the draft DCO (REP1-008).</p>

Reference	Written Representation Comment	Applicants' response
		5. The Applicants do not intend to produce a scaled-down model of the onshore substations as visualisations of the onshore substations for the Transmission Assets are available within Volume 3, Figures – Part 6 of 7 (APP-136) which provide appropriate representations of the proposals.

## 2.12 David Blackburn (REP1-131)

**Table 2.12: REP1-131 – David Blackburn**

Reference	Written Representation Comment	Applicants' response
REP1-131.01	I believe the site for the substation is inappropriate and has severe and permanent impact on residents and the agricultural lands around the cable and substation locations. Morgan and morcambe have made it as difficult as possible to keep people notified.the consultation was flawed by the fact it did not provide enough information in a clear format understandable by a lay person .the whole consultation process should be restarted.the close proximity to households could have an impact on people's health and wellbeing. alternative site suggestions should be carefully considered.	As noted above at section 1.1 Introduction, a number of responses have provided comments on site selection and the assessment of alternatives including suggesting that the Point of Interconnection for the Transmission Assets should be at or via Stanah. The Applicants provided an initial response on site selection and the assessment of alternatives at section 2.31.1 of The Applicants' Response to Relevant Representations Part 1 - Introduction and thematic responses (PDA-005). Following discussions relating to site selection and alternatives at Issue Specific Hearing 1 and in response to a number of the Examining Authority's Hearing Action Points, the Applicants provided a detailed technical response on these matters including explaining why the proposed alternative connection to Stanah is not a viable alternative. This was provided at Deadline 1 in Annex 5.2 to the Applicants response to Hearing Action Points: ISH1 6, 8, 9, 19, 26 & 28 - Rev F01 (REP1-039).

## 2.13 Debbie Mather, Deborah Cooper, Gillian Fielding (REP1-134, 135,146)

**Table 2.13: REP1-134, REP1-135, REP1-146**

Reference	Written Representation Comment	Applicants' response
REP1-146.1	I agree with everything in this statement as a member of the general public I have found this process difficult for me and my family to navigate but one thing I do know is the applicant has not been forthcoming or engaged with people from day one and I'm glad that questions are being asked of them	The Applicants take consultation and ongoing communications with the community seriously. A number of non-statutory consultations, alongside statutory consultations in accordance with the Planning Act 2008. A range of consultation events were held in the vicinity of the proposed Transmission Assets, including online events, exhibitions and pop-up events between November and December 2022, April and June 2023, and October and December 2023. These events were advertised in local newspapers, on local radio, on posters in the local area, through postcards and newsletters distributed through the local area and on social media. Further details can be found in the Consultation Report (APP-170).
REP1-134.01	Penwortham via Stanah, using an existing National Grid line, already 400KV capable, with cost savings estimated at £903mat current prices. The alternative would use a designated brownfield site, and create jobs in one of the most deprived areas of Lancashire in future energy intensive, green hydrogen production, yet applicants dismiss its feasibility, opting for complex solutions. The applicants avoid responsibility for landfall decisions, deferring to National Grid and hence they have opted for a conflicted, all new, cross -	As noted above at section 1.1 Introduction, a number of responses have provided comments on site selection and the assessment of alternatives including suggesting that the Point of Interconnection for the Transmission Assets should be at or via Stanah. The Applicants provided an initial response on site selection and the assessment of alternatives at section 2.31.1 of The Applicants' Response to Relevant Representations Part 1 - Introduction and thematic responses (PDA-005). Following discussions relating to site selection and alternatives at Issue Specific Hearing 1 and in response to a number of the Examining Authority's Hearing Action Points, the Applicants provided a detailed technical response on these matters including explaining why the proposed alternative connection to Stanah is not a viable alternative. This was provided at Deadline 1 in Annex 5.2 to the Applicants response to Hearing Action Points: ISH1 6, 8, 9, 19, 26 & 28 - Rev F01 (REP1-039).

Reference	Written Representation Comment	Applicants' response
REP1-134.02	Greenbelt route Greenbelt route Concerns arise over site selection, extended construction periods, and lack of benefits to local communities. Consultation efforts are insufficient, leading to stakeholder frustration.	In relation to the Green Belt, the Applicants have responded to this comment at Section 2.17.2 within document The Applicants' Response to Relevant Representations Part 1 - Introduction and thematic responses (PDA-005). The Applicants have also demonstrated in section 6 of the Planning Statement (REP1-032) that the significant benefits of the Transmission Assets, as a result of energy transmission from renewable sources, mean that even if the Transmission Assets were not considered to be Critical National Priority Infrastructure, very special circumstances exist which outweigh any harm to Green Belt. Further consideration of Green Belt matters has been set out in the Applicant's response to Hearing Action Points due at Deadline 1 - Rev F01 (REP1-037).
REP1-134.03	Agricultural impacts include prolonged and permanent land loss and disruption	The Applicants have responded to this comment within section 2.3.2 of the document The Applicants' Response to Relevant Representations Part 1 - Introduction and thematic responses (PDA-005).
REP1-134.04	Beach access at St Anne's faces likely closures without mitigation plans.	<p>The Applicants previously addressed concerns relating to beach access in section 2.5 of The Applicants' Response to Relevant Representations Part 1 - Introduction and thematic responses (PDA-005). Following the discussions at the Hearings, and in response to Hearing Action Points, the Applicants provided further detailed technical clarifications in relation to beach access in Annex 5.3 to the Applicants response to Hearing Action Points: ISH1 13, 14, 16, 17 (REP1-040).</p> <p>Further details of the public access to the beach during construction is set out in The Outline Open Space Management Plan which is at Appendix A of the Outline Public Rights of Way (PRoW) Management Plan (AS-048). This sets out the discrete working areas that will be subject to access management during construction works.</p>

Reference	Written Representation Comment	Applicants' response
REP1-134.05	Air safety concerns remain unresolved due to poor engagement with BAE Systems	<p>The Applicants take safety seriously and have previously responded to this matter relating to BAE Systems Warton within document The Applicants' Response to Relevant Representations Part 1 - Introduction and thematic responses (PDA-005), please see paragraphs 2.21.2.4 to 2.21.2.7 and provided further detail in their Deadline 1 Cover letter (REP1-001). In particular the Applicant has responded to issues around birdstrike in their response to Issue Specific Hearing 1 Action Point 40, in the Applicants' response to Hearing Action Points due at Deadline 1 (REP-037)</p> <p>Further detail on the site selection for the mitigation and biodiversity benefit areas is being submitted at Deadline 2.</p> <p>The Applicants are in ongoing dialogue with by BAE Systems Warton (Aerodrome) and are confident that any concerns can be satisfactorily addressed. The Applicants are committed to working with BAE Systems to provide them with the necessary information to undertake all aspects of their safeguarding assessment, including details for bird strike mitigation and will do so as part of continued engagement throughout the Examination.</p>
REP1-134.06	Emergency access for blue light vehicles during the construction period would create a danger to residents	<p>The Applicants have assessed the potential impact of the Transmission Assets on emergency services in Volume 3, Chapter 7: Traffic and Transport (APP-108) which considers the Transmission Assets traffic in relation to driver delay, severance, non-motorised user delay, fear and intimidation, road safety and abnormal loads.</p> <p>During construction, when the greatest impacts to the considerations on emergency services will be experience, the Applicants highlight that extensive commitments have been made to minimise disruption. The use of trenchless installation techniques, such as Horizontal Directional Drilling (HDD) to minimise disruption to all A, B and Classified roads (with the exception of Leach Lane) and railways proposed to be crossed by the Transmission Assets (see CoT02,</p>

Reference	Written Representation Comment	Applicants' response
		<p>Volume 1, Annex 5.3: Commitments Register (F 1.5.3/F03)). This commitment to the use of trenchless techniques is secured via Requirement 8 (Code of Construction Practice) of Schedules 2A and 2B of the draft DCO (REP1-008). With regard to Leach Lane, the Applicants have committed to maintaining access, with works completed on a 'half / half basis' with traffic to be controlled through the use of temporary traffic management, such as traffic signals. The open cut trenching on Leach Lane is not expected to result in any road closures and vehicular access would always be maintained including for emergency services and for buses.</p> <p>The approach to managing highway crossings is outlined in Section 1.10 of the Outline Construction Traffic Management Plan (OCTMP) (J5/F02).</p> <p>Subject to the grant of the DCO, the Applicants would note that the effects of construction traffic and highway works from Transmission Assets would be managed, monitored and controlled through the development of the detailed CTMPs. In compliance with Requirement 9 in Schedules 2A and 2B, the detailed CTMPs would need to be agreed with the relevant highway authorities. In approving the detailed CTMPs the relevant highway authorities would apply their statutory duties under the Traffic Management Act, 2004 to ensure the "expeditious movement of traffic on the authority's road network" which includes emergency services.</p>
REP1-134.07	Community benefits remain undefined despite available government guidance	<p>The Applicants refer to their response to Hearing Action Points due at Deadline 1 - Rev F01 (REP1-037). The Applicants regret that due to the timetabling of the Government's guidance they were unable to engage in the dialogue. In relation to community benefits, following discussion in Issue Specific Hearing 1 and in response to Examining Authority's Hearing Action Point ISH1_31 the Applicants have updated their Statement of Reasons with information on local community benefits. As confirmed by the Applicants in Issue Specific Hearing 1 they will be providing community benefits in line with Government guidance</p>

Reference	Written Representation Comment	Applicants' response
		(.see page 11 of The Applicants' Hearing Summary of the Issue Specific Hearing 1: Day 2 (REP1-035)) The Applicants will also be undertaking further engagement on community benefits with local stakeholders as discussed in The Applicants' response to Hearing Action Points due at Deadline 1 - Rev F01 (REP1-037)
REP1-134.08	Existing and proposed energy projects threaten to overwhelm greenbelt areas. The cumulative impacts of substations, cabling, and solar farms lack adequate assessment.	The Applicants have commented on the matter of cumulative effects in response to Issue Specific Hearing Action Point 29 which can be found in The Applicants' response to Hearing Action Points due at Deadline 1 - Rev F01 (REP1-037)The Applicants have carried out Cumulative Effects Assessment (CEA) screening and refer to Volume 1, Annex 5.5: Cumulative screening matrix and location plan (REP1-020) The Applicants will be submitting an update vis Review of Cumulative Effects Assessment and In-Combination Assessment at Deadline 2
REP1-134.09	Biodiversity concerns persist, with protected bird species inhabiting affected areas. Temporary land use remains unaccounted for in biodiversity net gain (BNG) calculations.	<p>The Applicants have responded to the matter of Ecology and Biodiversity in section 2.12 of their Response to Relevant Representations Part 1 – Introduction and thematic responses (PDA-005).</p> <p>In response to submissions made regarding Biodiversity Net Gain, the Applicants are pleased to reconfirm that although the requirement to provide BNG is not a legal requirement it is being provided voluntarily as explained in the Biodiversity Statement (AS-054).</p>
REP1-134.10	All of these issues are worsened by the refusal of the applicants to consider any alignment of their works leading to a potential 10 year period of disruption. Ultimately, the alternative route offers a more direct, cost - efficient, and environmentally viable solution that has been ignored by applicants	There is a need for project separation which the Applicants' have set out in Section 8 of document Annex 5.2 to the Applicants response to Hearing Action Points: ISH1 6, 8, 9, 19, 26 & 28 - Rev F01 (REP1-039). In delivering the Transmission Assets greater certainty can be given in the post consent stage where relevant planning authorities and others will be involved in approval of stages of the construction of the Transmission Assets.

## 2.14 Deborah Jane Bell (REP1-137)

**Table 2.14: REP1-137 – Deborah Jane Bell**

Reference	Written Representation Comment	Applicants' response
REP1-137.01	In view of the current national debt I am astounded at the fact that the Government are prepared to waste circa £900 million of UK taxpayers (I.e. MY money) on the proposed route when there is another, cheaper alternative route option at Stanah. The development at Stanah would bring much needed jobs and investment to their area and would involve development on a brownfield area rather than destroying valuable greenbelt land under the proposed plans. Then Stanah development option, in addition to being a much cheaper, more cost effective option, will be quicker to deliver, therefore leading to less disruption to the surrounding area / residents.	The Applicants refer to their response to Relevant Representations Part 1 - Introduction and thematic responses (PDA-005). For a more technical response see document Annex 5.2 to the Applicants response to Hearing Action Points: ISH1 6, 8, 9, 19, 26 & 28 - Rev F01 (REP1-039). As noted above at section 1.1 Introduction, a number of responses have provided comments on site selection and the assessment of alternatives including suggesting that the Point of Interconnection for the Transmission Assets should be at or via Stanah. The Applicants provided an initial response on site selection and the assessment of alternatives at section 2.31.1 of The Applicants' Response to Relevant Representations Part 1 - Introduction and thematic responses (PDA-005). Following discussions relating to site selection and alternatives at Issue Specific Hearing 1 and in response to a number of the Examining Authority's Hearing Action Points, the Applicants provided a detailed technical response on these matters including explaining why the proposed alternative connection to Stanah is not a viable alternative. This was provided at Deadline 1 in Annex 5.2 to the Applicants response to Hearing Action Points: ISH1 6, 8, 9, 19, 26 & 28 - Rev F01 (REP1-039).
REP1-137.02	It will have less impact on people's mental health (from sound opened logistical impacts during and after construction, to children's learning/brain development due to proposed proximity to schools), nature (due to disturbance / destruction of natural habitats), and local economy (due to loss of /	The Applicants acknowledge Ms Thomas' concerns regarding mental health. The Applicants have previously addressed concerns relating to human health, including mental health at section 2.19 of The Applicants' Response to Relevant Representations Part 1 - Introduction and thematic responses (PDA-005). This confirms that an assessment of human health (including mental health) is contained in Volume 1 Annex 5.1: Human Health (APP-035) and

Reference	Written Representation Comment	Applicants' response
	disturbance to trading e.g. at local riding schools, or through the loss of valuable farming land) and this could all be avoided if the site is moved to a commercial area and moved away from a heavily populated residential area.	<p>outlines various measures aimed at ensuring the continued health and wellbeing of the local population and how these are secured through the draft Development Consent Order (REP1-008).</p> <p>The Applicants are committed to developing the Transmission Assets in a way that is sensitive to the environment, minimising potential effects wherever possible. Impacts which have the potential to give rise to likely significant effects have been carefully assessed and appropriate mitigation identified throughout the Environmental Statement. Those measures are secured through the Requirements set out in Schedules 2A and 2B of the draft DCO (REP1-009). Mitigations are also set out in the updated Commitments Register (Annex 5.3: Volume 1 (F1.5.3/F03) submitted at Deadline 2.</p>
REP1-137.03	I suspect, natural frustrations amongst local residents using the traffic lights at the top of Kirkham Road, will lead to an increase in accidents if the increase in HGV traffic causes an increase in traffic queues. The junction of Hillock Lane with Kirkham Road is another well known accident spot locally and another place for potential increase in accidents due to road user frustrations.	The Applicants have responded to matter of traffic and transport at Section 2.32 within document The Applicants' Response to Relevant Representations Part 1 - Introduction and thematic responses (PDA-005).

## 2.15 Dr. David MacGregor (REP1-139)

**Table 2.15: REP1-139 – Dr. David MacGregor**

Reference	Written Representation Comment	Applicants' response
REP1-139.01	With reference to what is assumed to be 52a and 52b of the applicants plan. The applicants have not provided a detailed plan to myself or other local residents the same as the one used for the 1st hearing. the following factors, incorrect assumptions and omissions have emerged: Firstly, the applicants have not established the ownership rights of an area adjacent to entry to Fieldway FY8 3BL. This is shown on their plan as a significant part of their secondary (non airport route). We note that the applicant had put small stakes in the ground concerning ownership of the land. It has been communicated to the applicant that this is private land, maintained by the 6 residential owners of property on Fieldway. This has been communicated to them on two occasions with insufficient or non existent responses.	The Applicants have undertaken highways searches, searches at HMLR services, on site investigation and due diligence regarding land ownership within the order limits. The Applicants refer to paragraph 4.2.4 of their Consultation Report (APP-170) which sets out the process followed for consultation and identification of persons with an interest in the land . The Applicants understand the plot being referred to as plot 04-006 shown on the Land Plan – Onshore (REP1-004) which forms part of the adopted highway under the control of Lancashire County Council as highway authority and noted in the Book of Reference (REP1-014). The Applicants request that proof of ownership be provided to them to confirm Dr MacGregors interest along with those of the other 5 properties on Fieldway through the contact details within paragraph 1.15.2.1 of the Statement of Reasons (REP1-012)
REP1-139.02	Secondly, according to the plans outlined by the applicants regarding Leach Lane and Fieldway, the applicants have not allowed for traffic along Leach Lane and traffic joining Leach Lane from Fieldway. It has not been explained how local residents will gain access to their properties, run businesses in the area during the planned disruption by the applicants.	<p>With regard to Leach Lane the Applicants have proposed that the road remains open with works completed on a 'half / half basis' with traffic controlled through the use of temporary management, such as traffic signals. The Applicants can confirm that access will therefore be maintained to their properties along Leach Lane and Fieldway.</p> <p>The approach to managing highway crossings is outlined in Section 1.10 of the Outline Construction Traffic Management Plan (OCTMP) (J5/F02). The requirement to produce detailed CTMP(s) in accordance with the OCTMP and agree this with the relevant highway authority is secured by Requirement 9 of Schedules 2A and 2B of the draft DCO (APP-005).</p>

Reference	Written Representation Comment	Applicants' response
REP1-139.03	Thirdly, the area between Blackpool Road Playing Fields and Fieldway has an unmarked boundary between the FBC assets and area of community interest ie the playing fields and the private land at Fieldway. At no time has the extent of private and community FBC Land been addressed in the applicants plans. Further to this the applicants have not produced any sort of protection plan for the mature trees which act as the natural boundary between the playing fields and the private land on which Fieldway and the residences therein stand.	<p>The Applicants refer to their above response REP1-139 139.1 regarding ownership and interests in land. Within Land Plots 04-013, 04-014, we have identified those reputed owners and rights holders as set out in the Book of Reference including Lytham Town Trust and Fylde Council and the applicant is in ongoing dialogue with both parties.</p> <p>The Applicants have made a commitment (CoT03 of Volume 1, Annex 5.3: Commitments Register of the ES (F 1.5.3/F03)) to directly avoid Ancient Woodland sites and known Tree Preservation Orders (TPOs) where practicable during the site selection process for the Transmission Assets. Where possible, unprotected areas of woodland, mature and protected trees (i.e. veteran trees) have and will also be avoided. Volume 3, Annex 10.5 Tree survey and arboricultural impact assessment – Part 1 and Part 2 (APP-128 and APP-129) provides an assessment of the arboricultural impact of the Transmission Assets. Information on Tree Preservation Orders has been added to the tree constraints plans (Appendix B of APP-128 and APP-129) and tree protection plans (Appendix C of APP-128 and APP-129). The assessment concludes that there is no impact to TPO trees or to trees within conservation areas.</p>
REP1-139.04	Fourthly, the same trees act as a natural drainage aid to water run off from a large part of the north side of Blackpool Road Playing Fields, Fieldway, The Hamlet, Richards Way and Appealing Land. The applicants appear not to have formulated localised flood mitigation or given due diligence to the issue of standing water should the trees be felled or damaged.	<p>The Applicants note the concerns raised regarding flooding. An assessment of the potential for increased flood risk arising from additional surface water runoff is presented within section 2.11.3 of Volume 3, Chapter 2: Hydrology and flood risk of the ES (APP-070). An Outline Code of Construction Practice (APP-193) has been prepared and submitted with the application for development consent. The Outline CoCP includes measures in relation to flood risk during the construction phase (which is secured via Requirement 8 of Schedules 2A and 2B of the draft DCO (REP1-008)). The measures include ensuring that surface water runoff is intercepted and attenuated on site, and that surface water discharges are controlled in in quality and volume to ensure there is no increase to flood risk.</p> <p>Paragraph 2.11.3.21 of Volume 3 Chapter 2: Hydrology and flood risk (APP-070) states that due to the negligible increases in impermeable area associated</p>

Reference	Written Representation Comment	Applicants' response
		with the landfall, onshore export cable corridor and 400 kV grid connection cable (associated with transition joint bay and link box manhole covers) only negligible increases in surface water runoff will occur. As a result, new impermeable areas associated with these aspects of the Transmission Assets will not increase flood risk during the operational and maintenance phase and no drainage to mitigate surface water runoff will be required.
REP1-139.05	Point number 5, The issue of local bat roosts in the trees adjacent to have been raised with the applicants. This issue has not been treated with sufficient seriousness by the applicants. The response by the applicants was glib at best. Local residents are aware that the applicants have set aside an area for local wildlife mitigation. The wildlife survey produced by the applicants used historic data. It has been noted that the "local" wildlife survey has not used sufficiently robust analysis and data drawn from an area at the very edge of what is permissible by distance rather than the specific area in which the bats are roosting.	Surveys have been carried out in 2022, 2023 and 2024 in order to confirm the presence or indicate the likely absence of protected species including bats. The methods and scope of ecology surveys has been agreed with key stakeholders including Natural England at Expert Topic Group (ETG) meetings prior to the submission of the DCO application, and as such the baseline data are considered sufficiently robust for ecological impact assessment purposes. In accordance with standard industry guidelines precautionary approach to baseline characterisation, impact prediction and mitigation has been taken in situations where it has not been possible to complete surveys. See Volume 3, Chapter 3: Onshore ecology and nature conservation of the ES (APP-075). The Applicants will apply for mitigation licenses from Natural England if it there are unavoidable impacts on protected species, with the information necessary to allow the application to be determined. This will include pre-construction surveys for which there is a commitment within the OEMP (APP-212) (see Table 1.2).
REP1-139.06	Point six, should the route across Leach Lane, Blackpool Road Playing Fields and The Hamlet be adopted how will this work be managed against the development by a rival "green" energy provider to adopt a significant parcel of land to the east and south of the Blackpool Airport for a solar farm. Would the concurrent construction of same and the applicants secondary route Leach Lane, Blackpool	The Applicants note the comments made regarding other projects in proximity to the Transmission Assets. Volume 1, Annex 5.5: Cumulative Screening Matrix and Location Plan of the Environmental Statement (APP-039) provides details of the methodology for identification of cumulative projects for consideration and have identified where cumulative impacts have the potential to give rise to likely significant effects for specific impact assessments topic areas within the

Reference	Written Representation Comment	Applicants' response
	Road Playing Fields and the Hamlet lead to issues around siting, transportation, noise, congestion and traffic. At present both applications appear to suggest work will run concurrently.	Cumulative Effects Assessment (CEA). It also provides the CEA long list (both onshore and offshore) and cumulative effects screening matrix.  However, The Applicants understand that the proposed solar farm has not submitted a planning application at the time of writing and therefore the detail regarding the proposed solar farm is not available for the Applicants to undertake a cumulative assessment.
REP1-139.07	Point seven have the applicants approached Historic England to establish whether the pill box on Airport Land adjacent to Leach Lane consistent with other pill boxes in the U.K> now a protected building or monument. Further to this have the applicants produced plans for preservation regarding the same structure.	There are two pillboxes on land within Blackpool Airport and immediately west of Leach Lane. Both of these were constructed during the Second World War as part of the defences of RAF Squires Gate. Neither of the pillboxes are recorded on the non-statutory list of historic buildings maintained by Historic England (i.e. they are not listed buildings) nor are they included on the list of locally important historic buildings maintained by Fylde Council. The Applicants do not intend to undertake any works that would affect the physical integrity of these two pillboxes.
REP1-139.08	Point eight - complexity adds costs. Whilst there are clearly two applicant organisations at no time have the applicants identified the need for split routes across the Airport Land solely and the route via 52a 52b etc, local residents can see no rationale for the secondary route. Why not integrate both routes across the Airport in one single trench across brownfield land. Again the applicants have no satisfactory rationale for the added route across FBS Land.	The Applicants have undertaken a rigorous and robust route planning and site selection process in relation to the onshore infrastructure for the Transmission Assets (see Volume 1, Annex 4.3: Selection and Refinement of the Onshore Infrastructure (AS-028)). The cable corridor splits at Blackpool Airport to reduce impacts on both the airport and the Blackpool Road Recreational Grounds.
REP1-139.09	Finally, it appears that there has been insufficient diligence and a lack of local knowledge from the applicants as their "assumptions" about the cable route most notably in the FY8 3 area but along other parts of the route also. There is the need for a	The Applicants have undertaken a rigorous and robust site selection process for the Morgan Offshore Wind Project and the Morecambe Offshore Windfarm. A full reasoning and justification for the selection of the onshore cable route is provided in Section 4.9.2, Section 4.9.4 and Section 4.9.6 of Volume 1, Chapter 4, Site Selection and consideration of alternatives (AS-026). This is also

Reference	Written Representation Comment	Applicants' response
	serious rethink, combined with a more fine grained approach to the analysis and evaluation of local and environmental impacts on the part of the applicants particularly in the context the identification of the so called "Stanah" route.	supported by Volume 1, Annex 4.3: Selection and Refinement of Onshore Infrastructure (AS-028). The optimum route for an onshore grid connection is generally considered to be the shortest route from A to B from landfall to Penwortham National Grid Substation. The final route presented is considered to effectively achieve this, within the environmental, technical and social constraints that have been identified along the proposed onshore cable route.  The Applicants also thank National Grid's confirmation that it is National Grid's responsibility to identify the most suitable connection point based on a variety of factors. Ultimately, this has determined that Penwortham (and not Stanah) is the selected Point of Interconnection. This aligns with the statements made in the Applicants responses to Hearing Action Points ISH1_6, ISH1_8, ISH1_9, ISH1_19, ISH1_26 and ISH1_28 (REP1-037).

## 2.16 Fylde Against Cable Transmission and Substations (F.A.C.T.S) (REP1-141)

**Table 2.16: REP1-141 – Fylde Against Cable Transmission and Substations (F.A.C.T.S)**

Reference	Written Representation Comment	Applicants' response
REP1-141 141.1	Following my submission via interested party number 35794 in January, and my verbal submissions on behalf of F.A.C.T.S on 29th April 2025, I now add to those submissions with more detail. Firstly I invite the Examination Authority (Ex A) to accompany me on a walk through the location of the pipeline with Robert Eckton , a	As part of the project development the Applicants have engaged with all known and identified statutory undertakers, utility operators and private asset owners. The Applicants have followed an industry standard approach in identifying these interests that included:

Reference	Written Representation Comment	Applicants' response
	<p>retired Headmaster, who was the person who 'discovered' the existence of the Liquid Ethylene pipeline for the purposes of Fylde Borough Council Planning Application number :18/0036.</p> <p>On that occasion the Health and Safety Executive (HSE) became involved and advised against the small development applied for on the basis that it would constitute a risk incompatible with the Precautionary Principle. However, as the HSE do not involve themselves in infrastructure applications as a matter of policy projects for entirely practical and understandable reasons, the responsibility for investigating this matter independently therefore falls to the Ex A , the professional association for onshore pipeline operators (UKOPA) &amp; the Planning Advice for Hazardous Installations (PADHI).</p> <p>Please find attached an article explaining the remit and range of the legally binding Precautionary Principle on this application (although the UK is no longer part of the EU it has not repealed the legislation which binds the UK to the Precautionary Principle).</p> <p>The more serious threat to safety comes from the liquid ethylene pipeline (whose pathway map is attached to this submission), although the LPG pipeline also offers a significant risk of disturbance and danger to housing and other facilities nearby.</p> <p>The liquid ethylene pipeline, is pumped at high pressure at a temperature of minus 104*c. It is carried in a steel pipe approximately 3-4 feet below the surface although it can be seen at certain parts of the route at its shallowest depth. Liquid ethylene unlike LPG which requires a spark to ignite, explodes spontaneously on contact with air. When a crack appears on the pipeline and the ethylene begins to escape it causes the ethylene in the pipeline to</p>	<ul style="list-style-type: none"> <li>a formal utility search procured from Atkins Limited who are an experienced provider in the industry,</li> <li>full title interrogation of all registered titles within the Red Line Boundary to identify registered charges, easements and other rights of any assets,</li> <li>issue of Land Interest Questionnaires to all identified interests in any parcel within the order limits requesting confirmation of the data we held and any additional data not previously known or disclosed.</li> </ul> <p>Through this process and following receipt of the composite utility search data from Atkins, the Applicants have mapped all known and identified assets across the order limits within the Onshore Crossing Schedule (REP1-016 and REP1-018).</p> <p>The hand drawn LPG pipeline location as referenced by FACTS is the area shown on Sheet 25 and Sheet 26 within the Onshore Crossing Schedule (REP1-108) which highlights that, at this location, there are:</p> <ul style="list-style-type: none"> <li>three pipelines (MGMC_GCC_UT_1223/1230, MGMC_GCC_UT_1224/1231, and MGMC_GCC_UT_1200),</li> <li>one gas line (MGMC_GCC_UT_1232), and</li> <li>two water lines (MGMC_ECO_WA_1206/1207 and MCMC_ECO_WA_1220/1221).</li> </ul> <p>The SABIC ethylene pipeline (MGMC_GCC_UT_1224/1231) is the one which the Applicants believe that FACTS is referring to in its written representation. This pipeline was part of the original utilities search data from Atkins and was considered by the Applicants and included in the crossing schedule submitted with the application in September 2024.</p> <p>The Applicants are in dialogue with all parties, including Sabic, regarding protective provisions, crossing agreements or other required consents.</p> <p>Through the Applicants discussions with SABIC we have noted their strict working protocols, and in turn, the protected provisions will 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 committed to adhering to these requirements to ensure the highest standards of health and safety during the construction phase of the Project.</p>

Reference	Written Representation Comment	Applicants' response
	<p>expand, occasioning further fissures in the pipe back down the line.</p> <p>This means there are dangers to public safety, residential buildings, and businesses are all at risk from a leak originally caused much further away. The magnitude of the risk is therefore the much greater than the hazard calculation for the OZ, MZ and IZ zones outlined in the Pipeline Hazards paper I originally forwarded to the Ex A in January. The Ex A will see from the map which accompanies this submission that the liquid ethylene pipeline crosses both the A583 and the A584. It is close to two farms and to Dobbies Garden Centre, two large motorhome businesses and a caravan business which holds large quantities of Calor Gas for resale on its premises.. Dobbies were unaware of the existence of the liquid ethylene pipeline when contacted. F.A.C.T.S and LCC councillors intend to refer this matter to Dobbies owners (Tesco) as a matter of good health and safety practice.</p> <ul style="list-style-type: none"> <li>It is clear the Applicant undertook no background checks prior to submitting their proposal. Had they done so they would surely as a responsible company who say they are committed to public safety, have published details as to what strategy they proposed to deal with these significant threats to the safety of the community. This is not altogether surprising they were unaware of the ethylene pipeline in light of the fact that ethylene pipelines do not appear on any local or ordinance survey maps for fear of them being a terrorist target. However in the case of LPG pipes why the Applicant did not undertake an appraisal of the risks that a development of this size would render to the pipeline suggests once more an Application compiled in haste, without due diligence or any</li> </ul>	<p>The Applicants have provided protective provisions for Sabic at Part of Schedule 10 to the draft DCO (REP1-008). The status of current discussions with SABIC is presented within Rows 2, 9 and 14 respectively of the Land Rights Tracker (REP1-0650 submitted at Deadline 1). The Applicants are confident all matters can be agreed before the close of examination which is confirmed by SABIC in REP1-195.</p>

Reference	Written Representation Comment	Applicants' response
	meaningful consultation that might have led to an early identification of a more suitable and cost effective route.	
REP1-141 141.2	<p>Instead the Applicants ask the Ex A to pass their proposal on trust that a satisfactory solution may be found through negotiation with pipeline operators. This in fact would be in direct contravention of the Precautionary Principal. There are three factors associated with risk when undertaking development near gas and ethylene pipelines:</p> <ol style="list-style-type: none"> <li>1. An acute safety risk (in the applicants case one associated with a major incident arising from the large area and of volume of disruption which would occur as a result of the proposed development itself.</li> <li>2. Population and facilities within the affected zones identified in the Hazards paper I previously submitted to the Ex A.</li> <li>3. Excavation risk.</li> </ol> <p>that factors such as variable ground drainage (flooding causing ground to shift); the amount of vibration occasioned by filling in 30 tons of of concrete every 500 yards along the route for way stations; drilling and the combination of activity at any one time means that the risk from this activity cannot be accurately or safely calculated. The Precautionary Principle is informed by 3 specific principles:</p> <ol style="list-style-type: none"> <li>1. Full scientific evaluation &amp; the degree of uncertainty arising from that;</li> <li>2. a risk evaluation, an evaluation of the potential consequences of inaction and;</li> </ol>	Please refer to the response to REP1-141.1 above.

Reference	Written Representation Comment	Applicants' response
	<p>3. the participation of ALL interested parties in the study of precautionary measures (ie not just the companies that operate the pipelines).</p> <p>The attached article concludes: that jurisdictions governed by the Precautionary Principle agree that society must be protected even if science cannot provide. It is submitted that the level of uncertainty of outcome of the potential for (in this case catastrophic) damage, via disturbance to the pipelines is sufficient to refuse the Application as presently submitted. Further, should such an incident occur, the congestion occasioned by the acknowledged increase in HGV traffic on the route would exacerbate the effects of any incident, trapping commuters and delaying the intervention of the emergency services.</p> <p>The proportionality of adverse effects are therefore even greater for the community when these risks are assessed as a whole rather than individually. It is submitted that this is an occasion when the sum of risk is greater than the individual risk factors.</p>	
REP1-141 141.3	<p>None of these factors have been considered or addressed by the Applicant. It is simply not acceptable for the Applicant to say (as they did at the conclusion of OFH 1) 'give us permission and we will agree a path forward with the pipeline operators'. That is not an approach which conforms to the Precautionary Principle and not one which holds the safety and wellbeing of the community as a priority.</p>	<p>Please refer to the response to REP1-141.1 above.</p> <p>In relation to the suggestion of an alternative route at Stanah, the Applicants refer to Sections 3 and 4 (and the summary at 1.3) of REP1-039, and also to the Applicants' response to the Written Representation by the Lancashire Energy Working Group (S_D2_3.1). The Applicants' position, supported by NPS policy, is that it is not necessary nor appropriate to consider or assess hypothetical projects with alternative Points of Interconnection during this Examination.</p> <p>The PoI is the "terminating point" (in the language of paragraph 2.2.1 of NPS EN-5) where the projects connect to the National Electricity Transmission System owned by</p>

Reference	Written Representation Comment	Applicants' response
	It is the sheer lack of understanding of the Applicant of such matters which is rightly causing extreme shock and anxiety across the community of Fylde residents , commuters and indeed across the political spectrum, where MP's of all parties, councillors of all parties are all urging the Applicant to turn its attention to the alternative route at Stanah. The Stanah route harbours none of the many disruptions, dangers, and problems that are present with the cable corridor. It is a route favoured by residents of the Fylde and those in Blackpool North and Thornton Cleveleys where Stanah is located.	<p>NGET. The Pol for the projects is at the NGET Penwortham substation. The Pol was not selected by the Applicants. It was determined by a separate process which is subject to legal duties and process, and for which NESO (the UK's Electricity System Operator Licensee) is responsible, with input from NGET and the Applicants. The Pol was informed by the Holistic Network Design (HND) process led by NESO. A route to Stanah would involve a change to the Pol, which is not a decision within the direct control, statutory function, or expertise of the Applicants (Section 3 of REP1-039).</p> <p>The Applicants reiterate that they were engaged in the HND process and carefully considered the Pol proposed before accepting the connection offer, based on a clear and considered view that it represents a suitable and appropriate connection for the Generation Assets (Section 4.2 of REP1-039) which is supported by the NPS and is capable of being delivered sensitively within the host community and environment.</p>

## 2.17 Glen Leeming (REP1-147)

**Table 2.17: REP1-147 – Glen Leeming**

Reference	Written Representation Comment	Applicants' response
REP1-147.01	As a resident of the Fylde and specifically Freckleton, the following are my concerns and further considerations in relation to the Morgan and Morecambe Offshore Wind Farms Transmission Assets DCO Application:- 1. The choice of route from landfall at St Annes North Beach to Penwortham, including the siting of substations between Newton and Freckleton on greenbelt land gives cause for concern, especially when there is a much shorter, cheaper and less damaging route which can connect to Penwortham via Stanah, using an existing National Grid	Please see the response to REP1-164.

Reference	Written Representation Comment	Applicants' response
	line which I understand is already 400kv capable and could provide a cost saving estimated at £903m at current prices. This alternative would use a brownfield site and create jobs in a deprived area of Lancashire. The applicants appear to have avoided responsibility for landfall decisions and have deferred to National Grid in opting for the route they have chosen.	
REP1-147.02	2. The chosen route has many adverse impacts which include:- <ul style="list-style-type: none"> <li>• loss of Best and Most Versatile agricultural land</li> <li>• the use of unsuitable rural roads for HGV traffic, particularly across moss roads and narrow rural lanes</li> <li>• the closure of major routes such as Clifton Drive North and Queensway which could cause major traffic disruption</li> <li>• delays to emergency vehicles due to road closures</li> <li>• closure of the beach at St Annes with no plans for access in place</li> <li>• cables possibly being taken both sides of The New Thursby Care Home on Clifton Drive</li> <li>• increased risk of flooding caused by the works</li> <li>• damage to local ecology systems</li> <li>• possible disruption to the Fylde Coast tourist industry</li> </ul>	Please see response to REP1-164.
REP1-147.03	3. I have a major concern with regard to air safety due to poor engagement by Morgan & Morecambe with BAe Systems. Living in the village of Freckleton I know how the air disaster of August 1944 still affects villagers to this day.	Please see response to REP1-164.
REP1-147.04	4. There has been no emergency vehicle impact statement and as mentioned above the closure of major routes could result in delays to blue light vehicles.	The Applicants have assessed the potential impact of the Transmission Assets on emergency services in Volume 3, Chapter 7: Traffic and Transport (APP-108) which considers the Transmission Assets traffic in relation to driver delay, severance, non-motorised user delay, fear and intimidation, road safety and abnormal loads. The assessment concludes (with the application of the mitigation measures described below) that the residual effects upon all road users (including emergency services)

Reference	Written Representation Comment	Applicants' response
		<p>would not be significant in Environmental Impact Assessment (EIA) terms which means that further mitigation is not required.</p> <p>The Applicants highlight that extensive commitments have been made to the use of trenchless installation techniques, such as Horizontal Directional Drilling (HDD) to minimise disruption to all A, B and Classified roads (with the exception of Leach Lane) and railways proposed to be crossed by the Transmission Assets (see CoT02, Volume 1, Annex 5.3: Commitments Register (F 1.5.3/F03)). This commitment to the use of trenchless techniques is secured via Requirement 8 (Code of Construction Practice) of Schedules 2A and 2B of the draft DCO (REP1-008). With regard to Leach Lane, the Applicants have committed to maintaining access, with works completed on a 'half / half basis' with traffic to be controlled through the use of temporary traffic management, such as traffic signals. The open cut trenching on Leach Lane is not expected to result in any road closures and vehicular access would always be maintained including for emergency services and for buses. The approach to managing highway crossings is outlined in Section 1.10 of the Outline Construction Traffic Management Plan (OCTMP) (J5/F02). The requirement to produce the detailed CTMP(s) in accordance with the OCTMP in consultation with, and for approval by, the relevant highway authority, is secured by Requirement 9 of Schedules 2A and 2B of the draft DCO (REP1-008).</p> <p>Subject to the grant of the DCO, the Applicants would note that the effects of construction traffic and highway works from Transmission Assets would be managed, monitored and controlled through the development of the detailed CTMPs. In compliance with Requirement 9, the detailed CTMPs would need to be agreed with the relevant highway authorities. In approving the detailed CTMPs the relevant highway authorities would apply their statutory duties under the Traffic Management Act, 2004 to ensure the "expeditious movement of traffic on the authority's road network" which includes emergency services.</p>
REP1-147.05	5. The proposed substations are in close proximity to residential areas and three schools which could be extremely hazardous if a substation failure were to occur.	The Applicants note the concerns regarding the proximity of schools to the onshore substations and onshore export cable corridor. The Applicants have undertaken a rigorous and robust route planning and site selection process in relation to the onshore infrastructure for the Transmission Assets. This included the siting of infrastructure away from sensitive receptors such as schools and care homes. The nearest school is

Reference	Written Representation Comment	Applicants' response
		<p>approximately 330m from the Transmission Assets Order Limits which is the closest point at which the onshore export cables could be installed.</p> <p>A full reasoning and justification for the selection of the onshore infrastructure, including the range of criteria used and developed throughout the iterative process is provided in Section 4.9 of Volume 1, Chapter 4: Site Selection and Consideration of Alternatives (AS-026). This is also supported by Volume 1, Annex 4.3: Selection and Refinement of the Onshore Infrastructure (APP-033).</p> <p>Following discussions at Issue Specific Hearing 1, the Applicants have also provided further clarifications in relation to site selection in relation to the substations at ISH1_10 and ISH1_12 of The Applicants' response to Hearing Action Points due at Deadline 1 (REP1-037).</p> <p>The Applicants have addressed concerns relating to the siting of the substation and safety matters at section 2.92 of The Applicants' Response to Relevant Representations Part 1 - Introduction and thematic responses (PDA-005). The Applicants have undertaken an assessment of vulnerable groups within the Human Health Annex (APP-035) which includes consideration of impacts on young people and schools and summarises relevant mitigation measures to manage and minimise potential impacts during construction and operation of the Transmission Assets.</p>
REP1-147.06	6. The applicants will not commit to a single period of construction and I understand may want to allow a period of 4 years between schemes. This could mean a total build period of at least 10 years causing a much greater impact on local communities.	Please see response to REP1-164
REP1-147.07	7. Consultation efforts were insufficient at the very start of this process and do not appear to have improved.	Please see response to REP1-164.
REP1-147.08	8. I understand that Morgan & Morecambe are unwilling to discuss Community benefits at this stage despite there being available government guidance on this subject.	Please see response to REP1-164.

Reference	Written Representation Comment	Applicants' response
REP1-147.09	9. The cumulative impact of substations, cabling and solar farms lack adequate assessment and will result in increased industrialisation of a rural area.	Please see response to REP1-164.

## 2.18 Helen Molby (REP1-149)

**Table 2.18: REP1-149 – Helen Molby**

Reference	Written Representation Comment	Applicants' response
REP1-149.01	After attending the 4 days consultations at Blackpool Grand Hotel with the four Governments representatives, Morgan & Morecambe, local residents, councillors, businesses, land owners, wildlife representatives. I do believe M& M have not even considered an alternative route at a fraction of the cost which could save not only billions, but also save a vast amount of land required for the proposed cable route. I am greatly concerned regarding many different aspects such as when M&M barrister stated a Fylde councillor was incorrect in stating the beach would be closed. The corridor has to come onshore and go down the beach and also cross a major Rd the A584. The alternative route which seems to have been completely dismissed, or not even looked at, is a much shorter route, more direct, also has some things already in place regarding the national grid. Plus it would take less construction time and save so much agricultural land. Cause less impact on the environment, commuting, and local communities... I also discovered during this consultation that there would be two sets of cables corridors being constructed at different times along with	As noted above at section 1.1 Introduction, a number of responses have provided comments on site selection and the assessment of alternatives including suggesting that the Point of Interconnection for the Transmission Assets should be at or via Stanah. The Applicants provided an initial response on site selection and the assessment of alternatives at section 2.31.1 of The Applicants' Response to Relevant Representations Part 1 - Introduction and thematic responses (PDA-005). Following discussions relating to site selection and alternatives at Issue Specific Hearing 1 and in response to a number of the Examining Authority's Hearing Action Points, the Applicants provided a detailed technical response on these matters including explaining why the proposed alternative connection to Stanah is not a viable alternative. This was provided at Deadline 1 in Annex 5.2 to the Applicants response to Hearing Action Points: ISH1 6, 8, 9, 19, 26 & 28 - Rev F01 (REP1-039).

Reference	Written Representation Comment	Applicants' response
	<p>the same regarding the two different substations as each company will be working on their own . . Airspace is also a concern Blackpool Airport , but more so Bae Systems who supply the countries aeroplanes for our countries defence. The Fylde itself is a holiday destination that would be greatly affected by the cable corridor and commuting around the Fylde . , which in itself would cause an impact on the Four Emergency Services as there are only two major routes across the Fylde from the M6 Preston ( which had accidents almost every day) . which are the A584 &amp; A583. Of late even temporary traffic lights have caused delays of over half an hour , longer at rush hour. Is windfarms cost effective in the long run when you take into account the costs of time , constuction , man hours , upkeep etc when a wind turbine has a life span of approx 20 years and the proposed route could take 10 years plus the maintainance etc. The loss of land, disruption , congestion, mental distress for local residents , the construction traffic , construction noise , compulsory purchases , farmers who have had their fams for generations , homes &amp; schools in extremely close proximity to the cable route and substations As a local resident I have even more concerns now than I previously did . I believe tick boxes have been ticked but the real issues and concerns and justifications have not all been taken into account</p>	

## 2.19 Hilary Margaret Angus (REP1-150)

**Table 2.19: REP1-150 – Hilary Margaret Angus**

Reference	Written Representation Comment	Applicants' response
REP1-150.01	<p>My objection to this project is not against the offshore wind farm but the route for the onshore transmission assets chosen by the applicant or possibly by the applicants 'advisors'. I do not understand why they have chosen a route for the cable corridor, approximately 30 kilometres, from the coast, through the countryside to Penwortham when there is an eminently more suitable alternative which is Hillhouse Technology Local Enterprise Zone, a brownfield site in a deprived area and needing only 4 kilometres of underground drilling. I would suggest that the Inspectors visit this site. It seems to me that the Applicant, for whatever reason is ignoring any alternative route. Their initial consultation process failed miserably, with no meaningful engagement and lack of detail. This seems to be a totally inappropriate project where an alternative should have been considered. I would like to know why it wasn't or if it was, then what were the reasons for the decision?</p>	<p>As noted above at section 1.1 Introduction, a number of responses have provided comments on site selection and the assessment of alternatives including suggesting that the Point of Interconnection for the Transmission Assets should be at or via Stanah. The Applicants provided an initial response on site selection and the assessment of alternatives at section 2.31.1 of The Applicants' Response to Relevant Representations Part 1 - Introduction and thematic responses (PDA-005). Following discussions relating to site selection and alternatives at Issue Specific Hearing 1 and in response to a number of the Examining Authority's Hearing Action Points, the Applicants provided a detailed technical response on these matters including explaining why the proposed alternative connection to Stanah is not a viable alternative. This was provided at Deadline 1 in Annex 5.2 to the Applicants response to Hearing Action Points: ISH1 6, 8, 9, 19, 26 &amp; 28 - Rev F01 (REP1-039).</p>

## 2.20 Iryna Lewis (REP1-155)

**Table 2.20: REP1-155 – Iryna Lewis**

Reference	Written Representation Comment	Applicants' response
REP1-155.01	Although I am in favour of renewable energy, I oppose the plans proposed for the M&M windfarms cable route and location of the two substations at Newton With Scales for the following reasons: 1. The site selected for the substations will utilise designated green belt, high quality farmland that is an area of separation between the villages/towns of Newton With Scales/Freckleton/Kirkham. Little consideration has been given to these communities, including myself, in terms of prolonged construction periods (which could extend upto 10 years), increased HGV traffic, disruption to travel, agricultural impacts including permanent land loss and disruption, effect on the environment and wildlife, with the final result being permanently visually and audibly disruptive to residents and the neighbouring schools. No benefits to residents from this construction have been identified and the ability of emergency services to respond in the area during construction could be seriously compromised.	The Applicants refer to their response to Relevant Representations Part 1 - Introduction and thematic responses (PDA-005).
REP1-155.02	2. Consultation with residents has been limited and incomplete. Right at the start of the consultation period we asked for diagrams of what the substations would look like. I live on [redacted] Kirkham and the substations would be visible from my house. The M&M consultants were unable to give indication of how the substations would affect us visually. To date, the design of one of the substations has still not been finalised so how can plans be reviewed until all details have been presented. Manor Drive is included in the site locations to be visited by the Planning Inspectorate's Examining Authority in June 2025 but	The Applicants refer to their response to Relevant Representations Part 1 - Introduction and thematic responses (PDA-005).

Reference	Written Representation Comment	Applicants' response
	please bear in mind that the hedges and trees are in leaf and may obscure views of the proposed substation sites that would be far more visually intrusive during Autumn, Winter and early Spring.	
REP1-155.03	3. The proposed cable route would affect protected habitat areas such as the beach at St Annes, Newton March, Lytham Moss, Freckleton Marsh and Lea Marsh, adversely altering ecosystems and biodiversity over prolonged periods and therefore potentially permanently.	The Applicants refer to their response to Relevant Representations Part 1 - Introduction and thematic responses (PDA-005).
REP1-155.04	4. Lack of consideration by M&M for any alternative route that would be less environmentally damaging, that being to connect to Penwortham via Stanah, using an existing National Grid line, already 400KV capable, with cost savings estimated at £903m at current prices. The alternative would use a designated brownfield site, and create jobs in one of the most deprived areas of Lancashire in future energy intensive, green hydrogen production, yet M&M dismiss its feasibility, opting for complex solutions across rural Fylde. The applicants avoid responsibility for landfall decisions, deferring to National Grid and hence they have opted for a conflicted, all new, cross-Greenbelt route. Hopefully the Inspector will also tell the applicants to take a look at the alternative route to Stanah, precedents have been set I believe by Stonehenge and Langley Park School judgements.	The Applicants refer to their response to Relevant Representations Part 1 - Introduction and thematic responses (PDA-005). For a more technical response see document Annex 5.2 to the Applicants response to Hearing Action Points: ISH1 6, 8, 9, 19, 26 & 28 - Rev F01 (REP1-039).

## 2.21 Jane Elizabeth Ferguson (REP1-158)

**Table 2.21: REP1-158 – Jane Elizabeth Ferguson**

Reference	Written Representation Comment	Applicants' response
REP1-158.01	If this windfarm goes ahead on the current plans it will completely decimate the Fylde. It will do to our beautiful coastline and surrounding countryside what Margaret Thatcher did to coal mining. We will have no businesses as the roads will be so choked up with wagons nobody will be able to go anywhere. There are basically 3 roads directly into Blackpool and Lytham St Annes, all of which are on the plans as routes to your windfarms.	The Applicants refer to their response to Relevant Representations Part 1 - Introduction and thematic responses (PDA-005).
REP1-158.02	Our property values will hit the floor, we will be in negative equity. Who will want to live through 10+ years of a 30 mile long building site? You have said yourselves that you won't be combining the 2 projects together, infact you don't even have a time plan.	The Applicants refer to their response to Relevant Representations Part 1 - Introduction and thematic responses (PDA-005).
REP1-158.03	The negative impact to our health resulting from the increased heavy goods vehicles on our roads, the dust, the EMF, the destruction of our green spaces and bridleways of which we have very few, forcing horseriders onto the ever increasing busy roads, and just the general stress that is impacting our health currently worrying about this project.	The Applicants refer to their response to Relevant Representations Part 1 - Introduction and thematic responses (PDA-005).
REP1-158.04	The children in our local schools especially in Kirkham and Freckleton will have the hum of the substations all day every day. EMF is a massive cause of cancers. Why would you want to put children at 4 schools at risk of cancer??	The Applicants note the concerns regarding the proximity of schools to the onshore substations and onshore export cable corridor. The Applicants have undertaken a rigorous and robust route planning and site selection process in relation to the onshore infrastructure for the Transmission Assets. This included the siting of infrastructure away from sensitive receptors such as schools and care homes. The nearest school is approximately 330m from the Transmission Assets Order Limits which is the closest point at which the Projects' onshore export cables could be installed.

Reference	Written Representation Comment	Applicants' response
		<p>A full reasoning and justification for the selection of the onshore infrastructure, including the range of criteria used and developed throughout the iterative process is provided in Section 4.9 of Volume 1, Chapter 4: Site Selection and Consideration of Alternatives (AS-026). This is also supported by Volume 1, Annex 4.3: Selection and Refinement of the Onshore Infrastructure (APP-033).</p> <p>The Applicants have responded comment on EMF within document The Applicants' Response to Relevant Representations Part 1 - Introduction and thematic responses (PDA-005).</p>
REP1-158.05	<p>I cannot understand why you have to go this route when there is another, less disruptive, less expensive one.</p> <p>I love living in this area, we have the best of both worlds, the beach and the green spaces, please do not take this away from us.</p>	<p>As noted above at section 1.1 Introduction, a number of responses have provided comments on site selection and the assessment of alternatives including suggesting that the Point of Interconnection for the Transmission Assets should be at or via Stanah. The Applicants provided an initial response on site selection and the assessment of alternatives at section 2.31.1 of The Applicants' Response to Relevant Representations Part 1 - Introduction and thematic responses (PDA-005). Following discussions relating to site selection and alternatives at Issue Specific Hearing 1 and in response to a number of the Examining Authority's Hearing Action Points, the Applicants provided a detailed technical response on these matters including explaining why the proposed alternative connection to Stanah is not a viable alternative. This was provided at Deadline 1 in Annex 5.2 to the Applicants response to Hearing Action Points: ISH1 6, 8, 9, 19, 26 &amp; 28 - Rev F01 (REP1-039).</p>
REP1-158.06	<p>I know that pulling on heartstrings is not what you want to hear but I don't know of one single person (who actually is aware of this project) who is in agreement with your plans.</p> <p>People STILL DON'T KNOW about this and I feel this is your aim, to get under the radar. Have you sent any of your inspectors to the sites you are going to be decimating? Have you spoken to the residents? Sadly the first hearing wasn't well attended but I'm sure that I speak for the majority of people!</p>	<p>The Applicants note this response. The Applicants take consultation and ongoing communications with the community seriously. A number of non-statutory consultations, alongside statutory consultations in accordance with the Planning Act 2008. A range of consultation events were held in the vicinity of the proposed Transmission Assets, including online events, exhibitions and pop-up events between November and December 2022, April and June 2023, and October and December 2023. These events were advertised in local newspapers, on local radio, on posters in the local area, through postcards and newsletters distributed through the local area and on social media. Further details can be found in the Consultation Report (APP-170).</p>

Reference	Written Representation Comment	Applicants' response
		The Applicants have responded to concerns in relation to Consultation in Section 2.2.2 of their Response to Relevant Representations Part 1 - Introduction and thematic responses (PDA-005) in particular noting that the Acceptance Checklist (s55) (PD-003) where the Planning Inspectorate confirms in relation to adequacy of consultation it "is satisfied that the Applicants have complied with their statutory obligations."
REP1-158.07	<p>It would seem that importing fracked gas from America to fuel power stations, chopping acres of forest in Canada to power Brax and thousands of tonnes of coal from Japan to fuel the steel furnaces is ok. Plus the cost of getting it here from those far flung places!! Oh and making a motorway through the middle of the Amazon, the very lungs of the earth, for the COP summit. It defies any kind of common sense and I do believe that government thinks we are all dumb.</p> <p>We can rob the planet of her resources as long as it is not in this tiny country. China, America and India, the biggest polluters on the planet! What difference will the little old UK make when we get to 'net zero'.</p> <p>It is a complete farce whilst we import coal, wood and gas from other countries whilst the UK has coal, gas and we don't need to burn wood! We are chopping trees down to build houses and roads but the CO2 in the atmosphere is too great???</p> <p>Guess what? It doesn't take a brain surgeon to see we are being taken for a another great big tax ride.</p>	The Applicants note this response.

## 2.22 Joanne Gardner (REP1-159)

**Table 2.22: REP1-159 – Joanne Gardner**

Reference	Written Representation Comment	Applicants' response
REP1-159.01	<p>I am a local St Anne's Cllr on FBC and SATC for Kilnhouse, I am also a Kilnhouse resident. I have followed this project closely since attending 1 introductory session for Cllrs, 2 consultations and 1 drop in session. I am a recent member of FBC Planning Committee and the recent representative for SATC on the TASC group.</p> <p>My comments reflect this experience and this journey. I make my comments as a Kilnhouse resident keen to get the right outcome.</p> <p>Initially I was prepared to defend this project to NIMBYISM, prepared to support it in the search for much needed new renewable energy sources. Let's face it we are going through a 'Climate crisis and an Energy crisis'.</p> <p>However only once I travelled along this journey did I begin to realise what a flawed and environmentally destructive project this is.</p> <p>I am not an engineer so I have asked questions of the M&amp;M team and of others who object to the project. I have to say I have come to the conclusion that residents have been given inaccurate and confusing information, at best they have been mislead, at worst I believe they have been deliberately given false information.</p> <p>Initially I was told this would and I quote 'Just be like normal utilities', I envisaged it a bit like putting in new electricity cables or drainage. But no we will have our beach closed, our golf course disrupted, our playing fields closed where so many of our children play, (I was partly responsible for a campaign to get a play area built here),</p>	<p>The Applicants note this response and have responded to comments within document The Applicants' Response to Relevant Representations Part 1 - Introduction and thematic responses (PDA-005).</p> <p>The Applicants previously addressed concerns relating to beach access in section 2.5 of The Applicants' Response to Relevant Representations Part 1 - Introduction and thematic responses (PDA-005). Following the discussions at the Hearings, and in response to Hearing Action Points, the Applicants provided further detailed technical clarifications in relation to beach access in Annex 5.3 to the Applicants response to Hearing Action Points: ISH1 13, 14, 16, 17 (REP1-040).</p> <p>Further details of the public access to the beach during construction is set out in The Outline Open Space Management Plan which is at Appendix A of the Outline Public Rights of Way (PRoW) Management Plan (AS-048). This sets out the discrete working areas that will be subject to access management during construction works.</p>

Reference	Written Representation Comment	Applicants' response
	and for how long 4 years, 8 years or more? They can't tell us, because this is not one plan, but 2 plans from 2 different organisations. Why?	
REP1-159.02	As for the size of the substations on quality agricultural land, these are preposterous. Why take this across 30 miles of an area, when there are much shorter routes. All this when we know alternatives don't appear to have been considered. Why? Alternatives which are cheaper, nearer and are industrial areas.	The Applicants refer to their response to Relevant Representations Part 1 - Introduction and thematic responses (PDA-005).
REP1-159.03	There are so many other flaws which I know are in other reports from various bodies, so I don't want to repeat those, I want to let you know the verbal comments. Confused information given about drilling techniques, disruption to playing fields, traffic flow, beach closures, disruption to wildlife, biodiversity improvements etc.	<p>The Applicants note this response and have responded to comments within document The Applicants' Response to Relevant Representations Part 1 - Introduction and thematic responses (PDA-005).</p> <p>The Applicants previously addressed concerns relating to beach access in section 2.5 of The Applicants' Response to Relevant Representations Part 1 - Introduction and thematic responses (PDA-005). Following the discussions at the Hearings, and in response to Hearing Action Points, the Applicants provided further detailed technical clarifications in relation to beach access in Annex 5.3 to the Applicants response to Hearing Action Points: ISH1 13, 14, 16, 17 (REP1-040).</p> <p>Further details of the public access to the beach during construction is set out in The Outline Open Space Management Plan which is at Appendix A of the Outline Public Rights of Way (PRoW) Management Plan (AS-048). This sets out the discrete working areas that will be subject to access management during construction works.</p>
REP1-159.04	I can't support this project in any way, I hope the Planning Inspectorate realise what has gone on throughout the process and realises the damage the project if passed could do to this area. It's not NIMBYISM it's reality. Please don't allow this to go ahead, please consider better, cheaper or not, more appropriate alternatives, which do not destroy so many aspects of peoples' and wildlife lives.	<p>The Applicants note this response.</p> <p>The National Policy Statements (NPSs) establish the policy need for new renewable energy generation. NPS EN-3 identifies new offshore wind projects as a critical national priority infrastructure, for which there is an urgent need. The policy and legislative support for the scheme is set out in full in the Planning Statement (REP1-032).</p>

Reference	Written Representation Comment	Applicants' response
	I really don't know why alternatives have not been considered. I don't know why having been instructed by the National Grid to go to Penwortham alternative routes and methods were not fully considered. Based on this I believe this plan cannot be passed.	The Applicants are committed to developing the Project in a way that is sensitive to the local community and the environment, minimising effects wherever possible.

## 2.23 Jonathan Wilde (REP1-162)

**Table 2.23: REP1-162 – Jonathan Wilde**

Reference	Written Representation Comment	Applicants' response
REP1-162.01	<p>Why do we have to destroy the planet to save it? Simple answer, we don't.</p> <p>There is a much shorter, cheaper, less damaging alternative that can connect to Penwortham via Stanah, using an existing National Grid line, already 400 kV capable, with cost savings estimated at £903m at current prices. The alternative would use a designated brownfield site, and create jobs in one of the most deprived areas of Lancashire in future energy-intensive, green hydrogen production, yet applicants dismiss its feasibility, opting for complex solutions.</p>	As noted above at section 1.1 Introduction, a number of responses have provided comments on site selection and the assessment of alternatives including suggesting that the Point of Interconnection for the Transmission Assets should be at or via Stanah. The Applicants provided an initial response on site selection and the assessment of alternatives at section 2.31.1 of The Applicants' Response to Relevant Representations Part 1 - Introduction and thematic responses (PDA-005). Following discussions relating to site selection and alternatives at Issue Specific Hearing 1 and in response to a number of the Examining Authority's Hearing Action Points, the Applicants provided a detailed technical response on these matters including explaining why the proposed alternative connection to Stanah is not a viable or feasible alternative route or Point of Interconnection for the Transmission Assets. This was provided at Deadline 1 in Annex 5.2 to the Applicants response to Hearing Action Points: ISH1 6, 8, 9, 19, 26 & 28 - Rev F01 (REP1-039). A summary of the position is provided at section 1.1 above.
REP1-162.02	The applicant's representative intentionally withheld information when asked about the link boxes and the joint bays along the planned route. She spoke about the link boxes, which are only approximately eight cubic metres, of	The Applicants note the concerns raised about transition joint bays and link boxes. To clarify, the Transition Joint Bays (up to 4 for Morgan OWL and up to 2 for Morecambe OWL) will only be located within Work Nos. 10A10B as set out in the works descriptions contained within Schedule 1 (authorised project) of the draft DCO (C1/F04). Work Nos.

Reference	Written Representation Comment	Applicants' response
	<p>which approximately 1 metre is above ground. There are 100-120 along the planned route, and she downplayed them massively, they will be left in farmers fields making them more difficult to manage. She then 'forgot' to mention the joint bays, which are 20-30 times the size of link boxes and need larger excavation to place them into the land, again there will be 100-120 of these along the planned route, buried approximately 1 metre under ground, which they claim makes them invisible. But any agricultural farmland which has them in it will not be able to recover for 20-30 years, just in time for them to dig them up!</p>	<p>10A10B are located within Blackpool Airport as shown on sheet 4 of the Works Plans Onshore and Intertidal Part 1 of 2 (AS-016). The Applicants acknowledge that joint bays and link boxes are required along the cable corridor route. Table 3.18 of Volume 1, Chapter 3: Project Description (F1.3/F03) provides the parameters for link boxes and joint bays and confirms that up to 110 joint bays (up to 72 for Morgan OWL and up to 38 for Morecambe OWL) and 110 link boxes (up to 72 for Morgan OWL and up to 38 for Morecambe OWL) could be required. The precise locations of the joint bays and link boxes will be subject to detailed design, although as noted at paragraph 3.16.2.10 of Volume 1, Chapter 3: Project Description (F1.3/F03) the Applicants will always try and maximise the distance between joint bays to provide less intrusive cable installation. Paragraph 3.16.2.10 of Volume 1, Chapter 3: Project Description (F1.3/F03) also confirms that joint bays are typically concrete floor lined pits below ground, that provide a clean and dry environment for jointing sections of cable together. To minimise disruption to landowners during operation, land above the joint bays will be fully reinstated: joint bays will only require access during the operations and maintenance phase in the event of a cable failure requiring replacement. Following construction, reinstatement measures will be undertaken to ensure land is reinstated to baseline conditions. Section 3.15.5 of Volume 1, Chapter 3: Project description (APP-024) discusses how areas of construction will be reinstated in line with CoT08 and CoT09 of Volume 1, Annex 5.3: Commitments Register of the ES (F 1.5.3/F03) secured through Requirements 8 and 16 of Schedules 2A &amp; 2B of the draft DCO (C1/F04).</p> <p>The Applicants refer to section 3.21 of of Volume 1, Chapter 3: Project Description (F1.3/F03) in relation to the decommissioning of onshore infrastructure at the end of the operational lifetime of each offshore wind farm. Paragraph 3.21.3.2 of Volume 1, Chapter 3: Project Description (F1.3/F03) explains that during decommissioning, to minimise disturbance, cables may be recovered and removed by pulling the cables through the ducts or left in place in the ground with cable ends cut, sealed and securely buried. Whilst the precise methods of decommissioning will be agreed with the relevant planning authorities through onshore decommissioning plans pursuant to Requirement 22 of Schedules 2A and 2B of the draft DCO (C1/F04) the cables would not be dug up as part of decommissioning.</p>
REP1-162.03	The destruction this application brings is not proportionate to the benefits it brings when there is a more suitable route	The Applicants note this response and refer to the response at REP1-162.03 with regards to site selection and the suggested alternative route.

Reference	Written Representation Comment	Applicants' response
	which costs over £900 million less, would be quicker to deliver the energy to the grid and would help level up an area of the North West instead of destroying it.	<p>The Applicants are committed to developing the Transmission Assets in a way that is sensitive to the local community and the environment, minimising effects wherever possible.</p> <p>The National Policy Statements (NPSs) establish the policy need for new renewable energy generation. NPS EN-3 identifies new offshore wind projects as a critical national priority infrastructure, for which there is an urgent need. The policy and legislative support for the scheme is set out in full in the Planning Statement (REP1-032, REP1-032). In particular, the Applicants maintain, as set out in section 6 of the Planning Statement (REP1-032), the benefits of the proposed development outweigh any adverse impacts.</p>

## 2.24 Karen Leeming (REP1-164)

**Table 2.24: REP1-164 – Karen Leeming**

Reference	Written Representation Comment	Applicants' response
REP1-164.01	<p>As a resident of the Fylde and specifically Freckleton, the following are my concerns and further considerations in relation to the Morgan and Morecambe Offshore Wind Farms Transmission Assets DCO Application:-</p> <p>1. The choice of route from landfall at St Annes North Beach to Penwortham, including the siting of substations between Newton and Freckleton on greenbelt land gives cause for concern, especially when there is a much shorter, cheaper and less damaging route which can connect to Penwortham via Stanah, using an existing National Grid line which I understand is already 400kv</p>	<p>As noted above at section 1.1 Introduction, a number of responses have provided comments on site selection and the assessment of alternatives including suggesting that the Point of Interconnection for the Transmission Assets should be at or via Stanah. The Applicants provided an initial response on site selection and the assessment of alternatives at section 2.31.1 of The Applicants' Response to Relevant Representations Part 1 - Introduction and thematic responses (PDA-005). Following discussions relating to site selection and alternatives at Issue Specific Hearing 1 and in response to a number of the Examining Authority's Hearing Action Points, the Applicants provided a detailed technical response on these matters including explaining why the proposed alternative connection to Stanah a viable or feasible alternative route or Point of Interconnection for the Transmission Assets is not. This was provided at Deadline 1 in</p>

Reference	Written Representation Comment	Applicants' response
	capable and could provide a cost saving estimated at £903m at current prices. This alternative would use a brownfield site and create jobs in a deprived area of Lancashire. The applicants appear to have avoided responsibility for landfall decisions and have deferred to National Grid in opting for the route they have chosen.	Annex 5.2 to the Applicants response to Hearing Action Points: ISH1 6, 8, 9, 19, 26 & 28 - Rev F01 (REP1-039). A summary of the position is provided at section 1.1 above.  The Applicants have responded to the concerns regarding siting of the substations on greenbelt land in their response to ISH1_7 in The Applicants' response to Hearing Action Points due at Deadline 1 (REP1-038).
REP1-164.02	2. The chosen route has many adverse impacts which include:-  loss of Best and Most Versatile agricultural land the use of unsuitable rural roads for HGV traffic, particularly across moss roads and narrow rural lanes the closure of major routes such as Clifton Drive North and Queensway which could cause major traffic disruption delays to emergency vehicles due to road closures closure of the beach at St Annes with no plans for access in place  cables possibly being taken both sides of The New Thursby Care Home on Clifton Drive increased risk of flooding caused by the works damage to local ecology systems possible disruption to the Fylde Coast tourist industry	The Applicants acknowledge Ms Leeming's concerns relating to potential adverse effects from the Transmission Assets. The Applicants have undertaken a robust Environmental Impact Assessment to identify potential adverse effects and identify appropriate mitigation for those effects where necessary and appropriate. The Applicants provided information and responses in relation to the potential impacts listed by Ms Leeming in The Applicants' Response to Relevant Representations Part 1 - Introduction and thematic responses (PDA-005). For example, matters raised in relation to agricultural land are set out in section 2.3, traffic and transport matters (including emergency response times) in section 2.32, beach access in section 2.5, care homes in section 2.8, flood risk in section 2.16, ecology in section 2.12 and tourism in section 2.21. The Applicants also note that further clarifications in relation to a number of matters have been provided in response to Hearing Action Points at Deadline 1 including:  - Annex 5.3 to the Applicants response to Hearing Action Points: ISH1 13, 14, 16, 17 (REP1-040) in relation to beach access and construction works either side of the care home; and  - Annex 5.10 to the Applicants response to Hearing Action Points: ISH1 52 (REP1_046) in relation to effects on local business and tourism.  In addition, an updated Flood Risk Assessment (REP1-022, REP1-023 and REP1-024) has been provided at Deadline 1.
REP1-164.03	3. I have a major concern with regard to air safety due to poor engagement by Morgan & Morecambe with BAe Systems. Living in the village of Freckleton I know how the air disaster of August 1944 still affects villagers to this day.	The Applicants acknowledge Ms Leeming's concerns relating to air safety and matters raised at Issue Specific Hearing 1 in relation to bird strike. The Applicants confirmed at Issue Specific Hearing 1 that engagement with BAE is ongoing in order to agree a strategy for a bird strike management plan (see paragraphs 60 - 64 of The Applicants' Hearing Summary of Issue Specific Hearing 1 – Day 2 (REP1-035)). The Applicants also provided responses in relation to this matter at ISH1_40 of The Applicants' response to

Reference	Written Representation Comment	Applicants' response
		Hearing Action Points due at Deadline 1 (REP1-037) and provided further detail in relation to engagement with both BAE and Blackpool Airport in the Deadline 1 Cover letter (REP1-001). At deadline 2, the Applicants have submitted the Strategy for Wildlife Hazard Management Plan (S_D2_14) which has been shared with BAE and Blackpool Airport as part of the Applicants ongoing engagement with those bodies as explained in the Applicants' responses to Blackpool Airport and BAE written representations in The Applicants Responses to Written Representations from Statutory Consultees and other organisations (S_D2_3). The Applicants will continue to actively engage with BAE and Blackpool Airport to resolve their concerns in relation to bird strike.
REP1-164.04	4. There has been no emergency vehicle impact statement and as mentioned above the closure of major routes could result in delays to blue light vehicles.	<p>The Applicants have assessed the potential impact of the Transmission Assets on emergency services in Volume 3, Chapter 7: Traffic and Transport (APP-108) which considers the Transmission Assets traffic in relation to driver delay, severance, non-motorised user delay, fear and intimidation, road safety and abnormal loads. The assessment concludes (with the application of the mitigation measures described below) that the residual effects upon all road users (including emergency services) would not be significant in Environmental Impact Assessment (EIA) terms which means that further mitigation is not required.</p> <p>The Applicants highlight that extensive commitments have been made to the use of trenchless installation techniques, such as Horizontal Directional Drilling (HDD) to minimise disruption to all A, B and Classified roads (with the exception of Leach Lane) and railways proposed to be crossed by the Transmission Assets (see CoT02, Volume 1, Annex 5.3: Commitments Register (F 1.5.3/F03)). This commitment to the use of trenchless techniques is secured via Requirement 8 (Code of Construction Practice) of Schedules 2A and 2B of the draft DCO (REP1-008). With regard to Leach Lane, the Applicants have committed to maintaining access, with works completed on a 'half / half basis' with traffic to be controlled through the use of temporary traffic management, such as traffic signals. The open cut trenching on Leach Lane is not expected to result in any road closures and vehicular access would always be maintained including for emergency services and for buses. The approach to managing highway crossings is outlined in Section 1.10 of the Outline Construction Traffic Management Plan (OCTMP) (J5/F02). The requirement to produce the detailed CTMP(s) in accordance with the OCTMP in consultation with, and for approval by, the relevant highway authority, is secured by Requirement 9 of Schedules 2A and 2B of the draft DCO (REP1-008).</p>

Reference	Written Representation Comment	Applicants' response
		Subject to the grant of the DCO, the Applicants would note that the effects of construction traffic and highway works from Transmission Assets would be managed, monitored and controlled through the development of the detailed CTMPs. In compliance with Requirement 9, the detailed CTMPs would need to be agreed with the relevant highway authorities. In approving the detailed CTMPs the relevant highway authorities would apply their statutory duties under the Traffic Management Act, 2004 to ensure the "expeditious movement of traffic on the authority's road network" which includes emergency services.
REP1-164.05	5. The proposed substations are in close proximity to residential areas and three schools which could be extremely hazardous if a substation failure were to occur.	<p>The Applicants note the concerns regarding the proximity of schools to the onshore substations and onshore export cable corridor. The Applicants have undertaken a rigorous and robust route planning and site selection process in relation to the onshore infrastructure for the Transmission Assets. This included the siting of infrastructure away from sensitive receptors such as schools and care homes. The nearest school is approximately 330m from the Transmission Assets Order Limits which is the closest point at which the onshore export cables could be installed.</p> <p>A full reasoning and justification for the selection of the onshore infrastructure, including the range of criteria used and developed throughout the iterative process is provided in Section 4.9 of Volume 1, Chapter 4: Site Selection and Consideration of Alternatives (AS-026). This is also supported by Volume 1, Annex 4.3: Selection and Refinement of the Onshore Infrastructure (APP-033). Following discussions at Issue Specific Hearing 1, the Applicants have also provided further clarifications in relation to site selection in relation to the substations at ISH1_10 and ISH1_12 of the The Applicants' response to Hearing Action Points due at Deadline 1 (REP1-037).</p> <p>The Applicants have addressed concerns relating to the siting of the substation and safety matters at section 2.92 of The Applicants' Response to Relevant Representations Part 1 - Introduction and thematic responses (PDA-005). The Applicants have undertaken an assessment of vulnerable groups within the Human Health Annex (APP-035) which includes consideration of impacts on young people and schools and summarises relevant mitigation measures to manage and minimise potential impacts during construction and operation of the Transmission Assets.</p>

Reference	Written Representation Comment	Applicants' response
REP1-164.06	6. The applicants will not commit to a single period of construction and I understand may want to allow a period of 4 years between schemes. This could mean a total build period of at least 10 years causing a much greater impact on local communities.	The Applicants explained their approach to construction scenarios and coordination between Morgan OWL and Morecambe OWL at Issue Specific Hearing 1 (see in particular paragraphs 11 - 34 of The Applicants' Hearing Summary of Issue Specific Hearing 1 – Day 2 (REP1-035)). Following the hearings, the Applicants provided a detailed technical response to these points within Annex 5.2 to the Applicants response to Hearing Action Points: ISH1 6, 8, 9, 19, 26 & 28 - Rev F01 (REP1-039). Section 8 of REP1-039 clearly explains why flexibility must be retained within the draft DCO (REP1-008) to allow for the projects to be constructed in different ways and why Morgan OWL and Morecambe OWL cannot commit to concurrent construction within the draft DCO.
REP1-164.07	7. Consultation efforts were insufficient at the very start of this process and do not appear to have improved.	<p>The Applicants take consultation and ongoing communications with the community seriously.</p> <p>The Applicants have responded to concerns in relation to Consultation in Section 2.2.2 of The Applicants' Response to Relevant Representations Part 1 - Introduction and thematic responses (PDA-005) in particular noting that the Acceptance Checklist (s55) (PD-003) where the Planning Inspectorate confirms in relation to adequacy of consultation it "is satisfied that the Applicants have complied with their statutory obligations." The Applicants note this was similarly acknowledged by the Examining Authority (see paragraph 30 of The Applicants' Hearing Summary of the Compulsory Acquisition Hearing 1 (REP1-036)).</p> <p>The Applicants also note that they have carried out extensive rounds of non-statutory consultation, alongside statutory consultations in accordance with the Planning Act 2008. A range of consultation events were held in the vicinity of the proposed Transmission Assets, including online events, exhibitions and pop-up events between November and December 2022, April and June 2023, and October and December 2023. These events were advertised in local newspapers, on local radio, on posters in the local area, through postcards and newsletters distributed through the local area and on social media.</p> <p>Further details can be found in the Consultation Report (APP-170).</p>
REP1-164.08	8. I understand that Morgan & Morecambe are unwilling to discuss Community benefits at this stage despite there being available government guidance on this subject.	Following discussion in Issue Specific Hearing 1 in relation to community benefits, and in response to Examining Authority's Hearing Action Point ISH1_31 the Applicants have updated section 1.5 of their Statement of Reasons (REP1-012) with information on local community benefits. The Applicants will also be undertaking further engagement on

Reference	Written Representation Comment	Applicants' response
		community benefits with local stakeholders as discussed ISH_31 of The Applicants' response to Hearing Action Points due at Deadline 1 - Rev F01 (REP1-037).
REP1-164.09	9. The cumulative impact of substations, cabling and solar farms lack adequate assessment and will result in increased industrialisation of a rural area.	The Applicants consider their assessment of cumulative effects is adequate and provided a response to concerns raised in relation to cumulative impacts at section 2.10 of The Applicants' Response to Relevant Representations Part 1 - Introduction and thematic responses (PDA-005). The Applicants also provided further information in relation to cumulative effects in response to Hearing Action Point ISH1_29 within The Applicants' response to Hearing Action Points due at Deadline 1 (REP1-037) and, as noted in that response, have provided a Review of Cumulative Effects Assessment and In-Combination Assessment at Deadline 2 (S_D2_10).

## 2.25 Linda Ball (REP1-166)

**Table 2.25: REP1-166 – Linda Ball**

Reference	Written Representation Comment	Applicants' response
REP1-166.01	The companies involved have not visited / considered using a brownfield site at Stannah. This site would be cheaper, a shorter route and less environmentally damaging route; also providing jobs and economic growth to a deprived area which would welcome its involvement.	As noted above at section 1.1 Introduction, a number of responses have provided comments on site selection and the assessment of alternatives including suggesting that the Point of Interconnection for the Transmission Assets should be at or via Stanah. The Applicants provided an initial response on site selection and the assessment of alternatives at section 2.31.1 of The Applicants' Response to Relevant Representations Part 1 - Introduction and thematic responses (PDA-005). Following discussions relating to site selection and alternatives at Issue Specific Hearing 1 and in response to a number of the Examining Authority's Hearing Action Points, the Applicants provided a detailed technical response on these matters including explaining why the proposed alternative connection to Stanah is not a viable or feasible alternative route or Point of Interconnection for the Transmission Assets. This was provided at Deadline 1 in Annex 5.2 to the Applicants response to Hearing Action

Reference	Written Representation Comment	Applicants' response
		Points: ISH1 6, 8, 9, 19, 26 & 28 - Rev F01 (REP1-039). A summary of the position is provided at section 1.1 above.
REP1-166.02	Many local residents ,who will be directly impacted by the construction, are still unaware of the impact which will impact them. The consultation has been woefully inadequate and despite requests models of the substations have not been forthcoming.	<p>The Applicants take consultation and ongoing communications with the community seriously.</p> <p>The Applicants have previously responded to concerns in relation to Consultation in Section 2.2.2 of The Applicants' Response to Relevant Representations Part 1 - Introduction and thematic responses (PDA-005) in particular noting that the Acceptance Checklist (s55) (PD-003) where the Planning Inspectorate confirms in relation to adequacy of consultation it "is satisfied that the Applicants have complied with their statutory obligations.". The Applicants note this was similarly acknowledged by the Examining Authority (see paragraph 30 of The Applicants' Hearing Summary of the Compulsory Acquisition Hearing 1 (REP1-036)). The Applicants also note that they have carried out extensive rounds of non-statutory consultation, alongside statutory consultations in accordance with the Planning Act 2008. A range of consultation events were held in the vicinity of the proposed Transmission Assets, including online events, exhibitions and pop-up events between November and December 2022, April and June 2023, and October and December 2023. These events were advertised in local newspapers, on local radio, on posters in the local area, through postcards and newsletters distributed through the local area and on social media.</p> <p>Further details can be found in the Consultation Report (APP-170).</p>
REP1-166.03	The impact upon the emergency services does not seem to have been taken into consideration. The increase in HGVs and traffic hold ups are bound to have an impact upon response times and therefore dangerous to local residents.	<p>The Applicants have assessed the potential impact of the Transmission Assets on emergency services in Volume 3, Chapter 7: Traffic and Transport (APP-108) which considers the Transmission Assets traffic in relation to driver delay, severance, non-motorised user delay, fear and intimidation, road safety and abnormal loads. The assessment concludes (with the application of the mitigation measures described below) that the residual effects upon all road users (including emergency services) would not be significant in Environmental Impact Assessment (EIA) terms which means that further mitigation is not required.</p> <p>The Applicants highlight that extensive commitments have been made to the use of trenchless installation techniques, such as Horizontal Directional Drilling (HDD) to minimise disruption to all A, B and Classified roads (with the exception of Leach Lane) and railways proposed to be crossed by the Transmission Assets (see CoT02, Volume</p>

Reference	Written Representation Comment	Applicants' response
		<p>1, Annex 5.3: Commitments Register (F 1.5.3/F03)). This commitment to the use of trenchless techniques is secured via Requirement 8 (Code of Construction Practice) of Schedules 2A and 2B of the draft DCO (REP1-008). With regard to Leach Lane, the Applicants have committed to maintaining access, with works completed on a 'half / half basis' with traffic to be controlled through the use of temporary traffic management, such as traffic signals. The open cut trenching on Leach Lane is not expected to result in any road closures and vehicular access would always be maintained including for emergency services and for buses. The approach to managing highway crossings is outlined in Section 1.10 of the Outline Construction Traffic Management Plan (OCTMP) (J5/F02). The requirement to produce the detailed CTMP(s) in accordance with the OCTMP in consultation with, and for approval by, the relevant highway authority, is secured by Requirement 9 of Schedules 2A and 2B of the draft DCO (REP1-008).</p> <p>Subject to the grant of the DCO, the Applicants would note that the effects of construction traffic and highway works from Transmission Assets would be managed, monitored and controlled through the development of the detailed CTMPs. In compliance with Requirement 9, the detailed CTMPs would need to be agreed with the relevant highway authorities. In approving the detailed CTMPs the relevant highway authorities would apply their statutory duties under the Traffic Management Act, 2004 to ensure the "expeditious movement of traffic on the authority's road network" which includes emergency services.</p>
REP1-166.04	The two involved companies will not be working together meaning that the disruption may last many years.	<p>The Applicants explained their approach to construction scenarios and coordination between Morgan OWL and Morecambe OWL at Issue Specific Hearing 1 (see in particular paragraphs 11 - 34 of The Applicants' Hearing Summary of Issue Specific Hearing 1 – Day 2 (REP1-035)). Following the hearings, the Applicants provided a detailed technical response to these points within Annex 5.2 to the Applicants response to Hearing Action Points: ISH1 6, 8, 9, 19, 26 &amp; 28 - Rev F01 (REP1-039). Section 7 of REP1-039 sets out how Morgan OWL and Morecambe OWL will continue to work together post consent to deliver the two projects comprised within the Transmission Assets.</p>

## 2.26 Louise Scupham (REP1-167)

- 2.26.1.1 The Applicants note this is a copy of the Written Representation by Newton with Clifton and Freckleton Parish Council (REP1-183), so please see Document S\_D2\_3.4 Annex 3.4 to Applicants' Response to WRs from Statutory Consultees: Newton with Clifton and Freckleton Parish Councils.

## 2.27 Lynda Goupil (REP1-168)

**Table 2.26: REP1-168 – Lynda Goupil**

Reference	Written Representation Comment	Applicants' response
REP1-168.01	Most public concerns & suggestions of an alternate route for the cable corridor at the hearing I attended last month in Blackpool were dismissed or given very little consideration or time by the applicant's team. There is already a connection from an Irish wind farm to Penwortham via Hillhouse at Stannah. The applicants dismissed this suggested alternate route saying additional cables would be needed for the 400kV required, however, I am now informed the cables are already 400kV & therefore does need considering as estimates suggest a saving of £900m from the latest IET 2025 report for this project.	As noted above at section 1.1 Introduction, the Applicants acknowledge that a number of responses have provided comments on site selection and the assessment of alternatives including suggesting that the Point of Interconnection for the Transmission Assets should be at or via Stanah. The Applicants provided an initial response on site selection and the assessment of alternatives at section 2.31.1 of The Applicants' Response to Relevant Representations Part 1 - Introduction and thematic responses (PDA-005). Following discussions relating to site selection and alternatives at Issue Specific Hearing 1 and in response to a number of the Examining Authority's Hearing Action Points, the Applicants provided a detailed technical response on these matters including explaining why the proposed alternative connection to Stanah is not a viable or feasible alternative route or Point of Interconnection for the Transmission Assets. This was provided at Deadline 1 in Annex 5.2 to the Applicants response to Hearing Action Points: ISH1 6, 8, 9, 19, 26 & 28 - Rev F01 (REP1-039). A summary of the position is provided at section 1.1 above.
REP1-168.02	The applicants could not commit to timescales & were very unsure as to how long the disruption to the area will last, varying anywhere between 7-12 years.	In relation to overall construction periods the Applicants have provided consideration of potential construction scenarios and durations in their Rule 9 - ES assessment of Construction Scenarios (AS-070) at Section 1.5. The Applicants further explained their approach to construction scenarios and coordination between Morgan OWL and Morecambe OWL at Issue Specific Hearing 1 (see in particular paragraphs 11 - 34 of The Applicants' Hearing Summary of Issue Specific Hearing 1 – Day 2 (REP1-

Reference	Written Representation Comment	Applicants' response
		035)). Following the hearings, the Applicants provided a detailed technical response to these points within Annex 5.2 to the Applicants' response to Hearing Action Points: ISH1 6, 8, 9, 19, 26 & 28 - Rev F01 (REP1-039).
REP1-168.03	The environmental issues have still not been resolved with the Environment Agency regarding ecosystems in & around the sand dunes & are therefore still to be considered.	The Applicants are in ongoing dialogue with the Environment Agency (EA) and have resolved a number of matters with them as confirmed by the EA's written representation REP1-076. The Applicants are continuing to actively engage with the Environment Agency to resolve all outstanding matters including those relating to the Lytham St Annes SSI (sand dunes) as set out at ISH1_49 of The Applicants' response to Hearing Action Points due at Deadline 1 (REP1-037). This includes providing a preliminary hydrogeological risk assessment in relation to the trenchless installation beneath Lytham St Annes SSSI at Deadline 3.
REP1-168.04	There has been a lack of engagement with BAE Systems, still to be considered regarding bird strikes, which seems a big issue which the applicants seem to have given little consideration.	The Applicants confirmed at Issue Specific Hearing 1 that engagement with BAE is ongoing in order to agree a strategy for a bird strike management plan (see paragraphs 60 - 64 of The Applicants' Hearing Summary of Issue Specific Hearing 1 – Day 2 (REP1-035)). The Applicants also provided responses in relation to this matter at ISH1_40 of The Applicants' response to Hearing Action Points due at Deadline 1 (REP1-037) and provided further detail in relation to engagement with both BAE and Blackpool Airport in the Deadline 1 Cover letter (REP1-001). At deadline 2, the Applicants have submitted the Strategy for Wildlife Hazard Management Plan (S_D2_14) which has been shared with BAE and Blackpool Airport as part of the Applicants ongoing engagement with those bodies as explained in the Applicants responses to Blackpool Airport and BAE written representations in The Applicants Responses to Written Representations from Statutory Consultees and other organisations (S_D2_3). The Applicants will continue to actively engage with BAE and Blackpool Airport to resolve their concerns in relation to bird strike.
REP1-168.05	A lot of the roads/lanes to be used during construction seem to have been given little emphasis regarding their ability to cope with the size/weight/numbers of haulage wagons to be used during this work.	The Applicants responded to traffic and transport concerns at section 2.32 of The Applicants' Response to Relevant Representations Part 1 - Introduction and thematic responses (PDA-005). The Applicants also addressed these concerns relating to whether some of the roads accommodate haulage wagons during Issue Specific Hearing 1. This is summarised at paragraph 56 of The Applicants' Hearing Summary of Issue Specific Hearing 1 – Day 2 (REP1-035).

Reference	Written Representation Comment	Applicants' response
		<p>Subject to the grant of the DCO, the Applicants would note that the effects of construction traffic and highway works from Transmission Assets would be managed, monitored and controlled through the development of the detailed CTMPs. In compliance with Requirement 9 of Schedules 2A and 2B of the draft DCO (REP1-008), the detailed CTMPs would need to be agreed with the relevant highway authorities. In approving the detailed CTMPs the relevant highway authorities would apply their statutory duties under the Traffic Management Act, 2004 to ensure the "expeditious movement of traffic on the authority's road network".</p> <p>The Applicants are continuing to engage with both Lancashire County Council and Blackpool Borough Council in relation to traffic and transport matters.</p>
REP1-168.06	<p>The whole project has been poorly considered and very little consideration given to alternatives, many dismissed with little, if any, investigation.</p> <p>With the potential of vast savings the cable corridor site/route definitely needs re looking at &amp; considering.</p>	<p>The Applicants refer to their response to Ms Goupil on these points at REP1-168.01 above.</p>

## 2.28 Lynn Adele Plant (REP1-169)

**Table 2.27: REP1-170 – Lynn Adele Plant**

Reference	Written Representation Comment	Applicants' response
REP1-170.01	<p>I am a resident of the rural village of Freckleton and again, I am expressing my opposition to the siting of the proposed M &amp; M ( Morecambe &amp; Morgan) wind farm. There is a cheaper and far less environmentally damaging route, of</p>	<p>As noted above at section 1.1 Introduction, the Applicants acknowledge that a number of responses have provided comments on site selection and the assessment of alternatives including suggesting that there is an alternative route and the Point of Interconnection for the Transmission Assets should be at or via Stanah. The Applicants provided an initial response on site selection and the assessment of</p>

Reference	Written Representation Comment	Applicants' response
	which the proposers are now fully aware, and I urge you to visit the area to see for yourselves.	alternatives at section 2.31.1 of The Applicants' Response to Relevant Representations Part 1 - Introduction and thematic responses (PDA-005). Following discussions relating to site selection and alternatives at Issue Specific Hearing 1 and in response to a number of the Examining Authority's Hearing Action Points, the Applicants provided a detailed technical response on these matters including explaining why the proposed alternative connection to Stanah is not a viable or feasible alternative route or Point of Interconnection for the Transmission Assets. This was provided at Deadline 1 in Annex 5.2 to the Applicants response to Hearing Action Points: ISH1 6, 8, 9, 19, 26 & 28 - Rev F01 (REP1-039). A summary of the position is provided at section 1.1 above.
REP1-170.02	M & M have been less than transparent with the people of Fylde, in fact it was only at the meeting in the Grand Hotel Blackpool last month, that we realised that they were 2 completely separate companies, and were not planning to be working in any kind of partnership. We were shocked to learn that, as separate companies the timeline of works could stretch to TEN years. TEN years of massive disruption on our rural roads. Please visit Lower Lane in Freckleton to appreciate just how ludicrous it would be to have it used by HGVs ... it is barely passable for 2 cars, the idea that it could accommodate HGVs is just ridiculous.	<p>The Applicants have always sought to be transparent about the two companies promoting the two separate wind farms and included information on the two separate companies within various application documents and during pre-application consultation.</p> <p>In relation to overall construction periods the Applicants have provided consideration of potential construction scenarios and durations in their Rule 9 - ES assessment of Construction Scenarios (AS-070) at Section 1.5. The Applicants further explained their approach to construction scenarios and coordination between Morgan OWL and Morecambe OWL at Issue Specific Hearing 1 (see in particular paragraphs 11 - 34 of The Applicants' Hearing Summary of Issue Specific Hearing 1 – Day 2 (REP1-035)). Following the hearings, the Applicants provided a detailed technical response to these points within Annex 5.2 to the Applicants response to Hearing Action Points: ISH1 6, 8, 9, 19, 26 &amp; 28 - Rev F01 (REP1-039). Section 7 of REP1-039 sets out how Morgan OWL and Morecambe OWL will continue to work together post consent to deliver the two projects comprised within the Transmission Assets.</p> <p>The Applicants also confirmed at Issue Specific Hearing 1 (see paragraph 57 of The Applicants' Hearing Summary of Issue Specific Hearing 1 – Day 2 (REP1-035)) that the access from Lower Lane to the Morecambe substation is an operational access for light good vehicles only. It is not a construction access and will not be used by HGVs to access the Morecambe substation site.</p>

Reference	Written Representation Comment	Applicants' response
REP1-170.03	They plan to disrupt a sacred burial ground and devastate the habitat of untold species of wildlife on Lower Lane, this is reckless and totally avoidable.	The Applicants provided a response to concerns raised in relation to the Quaker Wood burial site at section 2.8 of The Applicants' Response to Relevant Representations Part 1 - Introduction and thematic responses (PDA-005). Further, the Quaker Wood Burial ground was discussed at Issue Specific Hearing 1 and the Applicants confirmed that disturbance to the burial ground will be avoided through the use of trenchless techniques in this area (see paragraph 88 of The Applicants' Hearing Summary of Issue Specific Hearing 1 – Day 2 (REP1-035). The Applicants also refer to REP1-170.02 which clarifies the use of Lower Lane as an operational access only by light good vehicles.
REP1-170.04	There are two schools in close proximity to Lower Lane, Carr Hill High School and Strike Lane Primary school. Lower Lane links Freckleton to Kirkham and it is a necessary travel route, especially at school times when Kirkham road (the main Freckleton to Kirkham route), is often brought to a standstill, whilst parents & carers take their children to and from Strike Lane School.	The Applicants responded to concerns raised relating to schools and travel routes at 2.32 of The Applicants' Response to Relevant Representations Part 1 - Introduction and thematic responses (PDA-005).  The Applicants have undertaken an assessment of vulnerable groups within the Human Health Annex (APP-035) which includes consideration of impacts on young people and schools including traffic related impacts and summarises relevant mitigation measures to manage and minimise potential impacts during construction and operation of the Transmission Assets.
REP1-170.05	I genuinely fear for the mental health of our residents, especially the children whose formative years are likely to be affected by the constant stress of noise and road closures; not to mention the incessant humming which will be transmitted from the massive substations which are to be erected in very close proximity to both the aforementioned schools.	The Applicants note the concerns regarding the proximity of schools to the onshore substations and onshore export cable corridor. The Applicants have undertaken a rigorous and robust route planning and site selection process in relation to the onshore infrastructure for the Transmission Assets. This included the siting of infrastructure away from sensitive receptors such as schools and care homes. The nearest school is approximately 330m from the Transmission Assets Order Limits which is the closest point at which the onshore export cables could be installed.  A full reasoning and justification for the selection of the onshore infrastructure, including the range of criteria used and developed throughout the iterative process is provided in Section 4.9 of Volume 1, Chapter 4: Site Selection and Consideration of Alternatives (AS-026). This is also supported by Volume 1, Annex 4.3: Selection and Refinement of the Onshore Infrastructure (APP-033).

Reference	Written Representation Comment	Applicants' response
		<p>The Applicants have acknowledged and addressed concerns relating to the siting of the substation and safety matters at section 2.92 of The Applicants' Response to Relevant Representations Part 1 - Introduction and thematic responses (PDA-005). Specifically, this references the Applicants' assessment of these matters within the Human Health Annex (APP-035) which includes consideration of impacts on young people and schools and sets out relevant mitigation measures to manage and minimise potential impacts during construction and operation of the Transmission Assets.</p>
REP1-170.06	<p>Another rural road M&amp;M propose to utilise is Hillock lane. Similar to Lower Lane it is narrow in places and two cars would not be able to pass each other, but M&amp;M are proposing to use it for HGV traffic. Every winter that road is a mass of deep potholes, it cannot cope with car &amp; van traffic, it will not cope with HGVs. Both roads regularly flood in heavy rain ... please visit to see for yourselves.</p>	<p>The Applicants responded to traffic and transport concerns at section 2.32 of The Applicants' Response to Relevant Representations Part 1 - Introduction and thematic responses (PDA-005). The Applicants also addressed these concerns relating to whether some of the roads could accommodate HGVs during Issue Specific Hearing 1. This is summarised at paragraph 56 of The Applicants' Hearing Summary of Issue Specific Hearing 1 – Day 2 (REP1-035).</p> <p>Subject to the grant of the DCO, the Applicants would note that the effects of construction traffic and highway works from Transmission Assets would be managed, monitored and controlled through the development of the detailed CTMPs. In compliance with Requirement 9 of Schedules 2A and 2B of the draft DCO (REP1-008), the detailed CTMPs would need to be agreed with the relevant highway authorities. In approving the detailed CTMPs the relevant highway authorities would apply their statutory duties under the Traffic Management Act, 2004 to ensure the “expeditious movement of traffic on the authority’s road network”.</p> <p>The Applicants are continuing to engage with both Lancashire County Council and Blackpool Borough Council in relation to traffic and transport matters.</p>
REP1-170.07	<p>The affect these proposals will have on house prices in our area will be colossal, especially for the residents of Lower Lane ...</p>	<p>The Applicants addressed concerns relating to property prices at section 2.27 of The Applicants' Response to Relevant Representations Part 1 - Introduction and thematic responses (PDA-005).</p>

Reference	Written Representation Comment	Applicants' response
REP1-170.08	<p>and it is so unnecessary, because the alternative route would be far less environmentally damaging and massively less expensive.</p> <p>M&amp;M have demonstrated quite clearly that they have not thought this through adequately. They have focussed on their half baked plans and have refused to give credence to any alternative suggestion.</p> <p>I urge you to do site visits to the areas that Blackpool &amp; Fylde residents request, not just the sites M&amp;M suggest.</p>	<p>The Applicants refer to their response to Ms Plant at REP1-170.01 above in relation to the suggested alternative route.</p>

## 2.29 Mike Obrien (REP1-175)

**Table 2.28: REP1-175 – Mike Obrien**

Reference	Written Representation Comment	Applicants' response
REP1-175.01	<p>The site is wholly unsuitable for the purpose .</p> <p>The roads are too narrow which will cause vast traffic queues and noise. This will affect the well being of the local community.</p>	<p>The Applicants responded to traffic and transport concerns at section 2.32 of The Applicants' Response to Relevant Representations Part 1 - Introduction and thematic responses (PDA-005). The Applicants also addressed concerns relating to whether some of the roads could accommodate two way movements and HGVs during Issue Specific Hearing 1. This is summarised at paragraph 56 of The Applicants' Hearing Summary of Issue Specific Hearing 1 – Day 2 (REP1-035).</p> <p>Subject to the grant of the DCO, the Applicants would note that the effects of construction traffic and highway works from Transmission Assets would be managed, monitored and controlled through the development of the detailed CTMPs. In compliance with Requirement 9 of Schedules 2A and 2B of the draft DCO (REP1-008), the detailed CTMPs would need to be agreed with the relevant highway authorities. In approving the detailed CTMPs the relevant highway authorities would apply their</p>

Reference	Written Representation Comment	Applicants' response
		<p>statutory duties under the Traffic Management Act, 2004 to ensure the “expeditious movement of traffic on the authority’s road network”.</p> <p>The Applicants are continuing to engage with both Lancashire County Council and Blackpool Borough Council in relation to traffic and transport matters.</p> <p>The Applicants also note that they have also undertaken an assessment of vulnerable groups within the Human Health Annex (APP-035) which includes consideration of traffic related impacts.</p>
REP1-175.02	House prices will drop instantly.	The Applicants addressed concerns relating to property prices at section 2.27 of The Applicants' Response to Relevant Representations Part 1 - Introduction and thematic responses (PDA-005).
REP1-175.03	The cable corridors will cause loss of valuable farmland and potentially floods.	<p>The Applicants addressed concerns relating to potential loss of productive farmland at section 2.3 of The Applicants' Response to Relevant Representations Part 1 - Introduction and thematic responses (PDA-005). The Applicants also addressed concerns relating to potential flooding at section 2.16 of The Applicants' Response to Relevant Representations Part 1 - Introduction and thematic responses (PDA-005).</p> <p>Potential impacts on farm holdings and agricultural land were discussed at Issue Specific Hearing 1 (see paragraphs 65 – 75 of The Applicants' Hearing Summary of Issue Specific Hearing 1 – Day 2 (REP1-035)) and Compulsory Acquisition Hearing 1 (see paragraph 22 of The Applicants' Hearing Summary of Compulsory Acquisition Hearing 1 (REP1-036)) following which the Applicants have responded to a number of Hearing Action Points relating to these matters. Please see ISH1_46, ISH1_47 and CAH1_5 of The Applicants' response to Hearing Action Points due at Deadline 1 (REP1-037).</p>
REP1-175.04	There will be electromagnetic fields created by the project which will Impact upon schools and local Populated areas.	The Applicants addressed concerns relating to potential electromagnetic fields or EMF impacts at section 2.13 of The Applicants' Response to Relevant Representations Part 1 - Introduction and thematic responses (PDA-005).

## 2.30 Newton Residents Association (REP1-181)

2.30.1.1 The Applicants note this is a copy of the Written Representation by Newton with Clifton and Freckleton Parish Council (REP1-183), so please see Document S\_D2\_3.4 Annex 3.4 to Applicants' Response to WRs from Statutory Consultees: Newton with Clifton and Freckleton Parish Councils.

## 2.31 Philip James Morgan (REP1-189)

2.31.1.1 The Applicants note this is a copy of the Written Representation by Newton with Clifton and Freckleton Parish Council (REP1-183), so please see Document S\_D2\_3.4 Annex 3.4 to Applicants' Response to WRs from Statutory Consultees: Newton with Clifton and Freckleton Parish Councils.

## 2.32 Ralph Cairns (REP1-191)

**Table 2.29: REP1-191 – Ralph Cairns**

Reference	Written Representation Comment	Applicants' response
REP1-191.01	Subject: Three Nooks Lane as the Applicants proposed cut through access from the A583 to the A584  I write the following to update the Examining Authority (Ex A) on the verbal submissions I made in respect of the above issue at the Grand Hotel Blackpool on April 29th of this year.	The Applicants note this response.
REP1-191.02	To recap: The A583 and the A584 are the two arterial roads into the Fylde along with the A585 from Junction 3 of the M55. It is not possible to reach most parts of the Fylde coast from the south or east by any other route.  The recently opened Junction 2 of the M55 has significantly increased traffic flow from these directions onto the A584 for traffic heading towards Freckleton,	The Applicants refer Mr Cairns to its response to RR-704.3 within Annex 3.1.1 to Response to RR -Fylde Against Cable Transmission and Substations (RR-704) (PDA-006) which addresses Mr Cairns concerns relating to Three Nooks Lane and access through the A583 and A584. In summary, the Applicants can confirm that there are no proposals to re-open Three Nooks Lane between the A583 and A584.

Reference	Written Representation Comment	Applicants' response
	<p>Warton, and Lytham St Annes. This is due to the A585 route being markedly slower due to the narrow nature of the road joining the Junction 3 roundabout and the 3 other major roundabouts towards Wrea Green that seek to deal with the flow of traffic to and from AFC Fylde and the Aldi store.</p> <p>The Applicant seeks to utilise all 3 of these roads as part of their HGV route.</p> <p>For some reason which is not completely clear to me, there is an application to reopen the closed end of Three Nooks Lane which joins the A583. This road was closed 20 years ago because of the number of accidents the junction (at both ends) had recorded against it. By closing one end Lancashire County Council Roads Unit significantly reduced the number of incidents at both.</p> <p>I have lived adjacent to this junction for 8 years. In that time there has been a steady flow of major traffic incidents requiring the intervention of the emergency services as traffic flow which has steadily increased. These have increased further since the opening of Junction 2 on the M55 motorway.</p> <p>I request the Ex A permit me to escort them on a site inspection of this junction and to assist the authority with further explanation should they require it. However, it is my intention to make the issues clear in this submission.</p>	
REP1-191.03	<p>Issue 1: The junction danger as it stands.</p> <p>Presently, the number of incidents that have occurred requiring the intervention of the emergency services has increased. When I have assisted people in distress following an accident I have been able to ascertain the following:</p>	

Reference	Written Representation Comment	Applicants' response
	<p>(i) That most accidents come from people turning right from the westbound carriageway on the A584 onto the cut through either through an attempt to enact a 'U' turn onto the eastbound carriageway as a result of unclear satellite navigation guidance or to enter the closed Three Nooks Lane.</p> <p>(ii) The reason for the collisions appears to stem from two different scenarios. Firstly the sudden slowing down in the right hand lane (which many drivers see as the 'fast' lane) causing a rear end shunt. The second reason is when the car turning right makes a late change of lane into the outside lane and another car travelling at speed in that lane does not react in time to avoid a collision.</p>	
REP1-191.04	<p>Issue 2. The problems the Applicant's proposal will inevitably cause.</p> <p>There are only two specific ways the applicant can open traffic flow on Three Nooks Lane:</p> <p>(i) The first is to simply open the lane at its' junction with the A583. This in my view would be a highly irresponsible act that would certainly result in a considerable number of deaths over the period in which the Applicant sees the route being utilised (between 4 -10 years depending on levels of co-ordination of the work required). The reason for this is the cut off on the A 583 is located on a blind bend by the bus stop. Traffic would not be slowed but would be confronted by HGV vehicles turning right across the eastbound carriageway onto the westbound A583. This would clearly exacerbate the existing conditions which have caused the increase in major traffic incidents.</p> <p>(ii) The second option is for the Applicant to ask for two sets of three way lights to be installed at either end of the lane 200 yards before the intersection with The A584 &amp; A</p>	

Reference	Written Representation Comment	Applicants' response
	<p>583 where there are already a major set of three way lights (although traffic proceeding down the hill of the A583 may filter left onto the A584 without halting at the lights). The problem with this alternative was first highlighted in my original submission 35788 in January and contained a photograph of the tailback caused by the closure of a 50 yard stretch of one lane of the A584 due to tree pruning. This was taken in the middle of a weekday on a winter's afternoon. It was not taken in rush hour or at the height of the tourist season. The installation of two sets of three way lights on Three Nooks Lane would increase these tailbacks many times over, leading to unconscionable delays for commuters, tourists, and those undertaking the school run. So in effect the majority of people entering or leaving the Fylde. A further complication for this option would be the slowing of any response time by the emergency services to incidents. Three way traffic lights here will not stem the flow of major traffic incidents, it will at best just slow the level of increase but cause unacceptable levels of tailback.</p>	
REP1-191.05	<p>(iii) Other effects:</p> <p>(a) Opening the very narrow Three Nooks Lane to HGV traffic would be to render closure to the popular Airbnb which is number 1 rated in the Fylde, and has operated from there for the last 5 years. Three Nooks is a high value property whose value has been further enhanced by the successful building and establishment of a sophisticated 2 storey barn structure which enjoys uninterrupted views of fields from a first floor Juliet balcony and is advertised also on Facebook as 'Little Nook – A peaceful place to stay'. I invite the Ex A to consult that Facebook page to see what they would be destroying if the Applicant's route is passed. Access to Three Nooks Lane would certainly be made unpleasant and extremely difficult if not impossible for</p>	

Reference	Written Representation Comment	Applicants' response
	<p>guests entering Little Nook, and would also in effect serve to entrap the owners in their own home.</p> <p>(b) [Redacted]. The family moved there and built the business within the grounds of the house in order to lessen his [redacted] and aversion to noise. These facts may be confirmed by the individual's concerned educational statement.</p>	
REP1-191.06	<p>The alternative approach to this route considered.</p> <p>The alternative to this portion of the proposed route would be to go round the existing lights turning right at the A583 onto the A584.</p> <p>Although this route does have some merit, in that it isn't completely 'half baked', it still poses serious problems. Traffic from the eastern direction of the A583 past the Lea Gate Hotel and Hallmark Cars, filtering left onto the A584 would still be proceeding at a strong flow at most times of the day.</p> <p>A high level increase in the number of HGV vehicles here will inevitably create a 'fast' and 'slow' lane on the A584. Cars that turn right on the cut through to Three Nooks Lane or attempting a 'U' turn onto the west bound carriageway, will therefore continue to be threatened with collision from their own error or from the error of others.</p>	
REP1-191.07	<p>If despite all the objections the Ex A have heard still assess this route to be more preferable than others, or still viable in terms of its disruption to the economy and amenity of the people of the Fylde, then the ONLY option in my submission would be to close the cut through altogether.</p> <p>I understand Lancashire County Council Traffic Division has been in touch with the Applicant registering their own</p>	

Reference	Written Representation Comment	Applicants' response
	<p>concerns about using the Three Nooks Lane aspect of their proposal.</p> <p>I invite and urge the Ex A to conduct a site visit of this aspect of the Applicant's proposed route and to validate for themselves the points raised herein.</p>	

## 2.33 Richard Hugh Lewis (REP1-193)

**Table 2.30: REP1-193 – Richard Hugh Lewis**

Reference	Written Representation Comment	Applicants' response
REP1-193.01	I am in favour of renewable energy in principle; I've had solar panels on my house for more than 12 years which not only largely power my house but export surplus kWh to the National Grid. However, I have a number of objections to the proposed onshore route of the Transmission Assets and location of the substations for the Morecambe and Morgan Offshore Wind Farm.	The Applicants note this response.
REP1-193.02	The planned onshore cable route would be very disruptive to thousands of residents, businesses and visitors across the south of the Fylde peninsula during the construction phase, which could last 10 years.	<p>The Applicants have addressed concerns relating to disruption to local communities and businesses at section 2.21 of The Applicants' Response to Relevant Representations Part 1 - Introduction and thematic responses (PDA-005). The Applicants have also provided further clarifications in response to Hearing Action Points at Deadline 1 including:</p> <ul style="list-style-type: none"> <li>- Annex 5.10 to the Applicants response to Hearing Action Points: ISH1 52 (REP1_046) in relation to effects on local business and tourism; and</li> <li>- Annex 5.2 to the Applicants response to Hearing Action Points: ISH1 6, 8, 9, 19, 26 &amp; 28 - Rev F01 (REP1-039). Section 7 of REP1-039 sets out how Morgan OWL</li> </ul>

Reference	Written Representation Comment	Applicants' response
		and Morecambe OWL will continue to work together post consent to deliver the two projects comprised within the Transmission Assets with a view to minimising impacts on local communities wherever practicable.
REP1-193.03	The substations are located on green belt land and would be massively disruptive, visually and audibly, environmentally and ecologically. That applies long after the construction phase, irreversibly altering the green belt land on which they would be sited. Please bear in mind that the hedges and trees are in leaf now so may obscure views of the sites, particularly the substations that would be far more visually intrusive during Autumn, Winter and early Spring.	In response to concerns raised in relevant representations about the siting of the substation, the Applicants provided an explanation of the site selection process undertaken by the Applicants (including in relation to green belt) at sections 2.17 and 2.31 of The Applicants' Response to Relevant Representations Part 1 - Introduction and thematic responses (PDA-005). Site selection was discussed further at Issue Specific Hearing 1 and the Applicants refer in particular to paragraphs 17 -21 and 49 to 54 of The Applicants' Hearing Summary of Issue Specific Hearing 1 – Day 2 (REP1-035). The Applicants have also provided further clarifications in relation to site selection including in relation to siting of the substations and green belt in response to Hearing Action Points following the hearings. Specifically, the Applicants refer to ISH_7 of The Applicants' response to Hearing Action Points due at Deadline 1 (REP1-037). The Applicants have assessed potential adverse impacts through their environmental impact assessment reported through the relevant chapters of the Environmental Statement which identifies appropriate mitigation measures to minimise those impacts which are secured through the Requirements set out in Schedules 2A and 2B of the draft DCO (REP1-008). For example, the Applicants note that the substations are subject to Requirements 4 (substation works), 5(1) (Detailed design parameters onshore), 15 (Fencing and other means of enclosure), 17 (Control of operational artificial light emissions), 18 (Control of noise during operational stage) and 20 (Operational drainage management plan) of Schedules 2A and 2B of the draft DCO (REP1-008). Further, they are also subject to measures contained within the outline Code of Construction Practice (APP-193), outline Ecological Management Plan (J6/F02) and the outline Landscape Management Plan (AS-050) pursuant to Requirements 6, 7, 8 and 10 of Schedules 2A and 2B of the draft DCO (REP1-008).
REP1-193.04	There appear to be absolutely no benefits to local residents or businesses from this development, only disruption, stress and financial impact.	The Applicants have addressed concerns relating to disruption to local communities and businesses at section 2.21 of The Applicants' Response to Relevant Representations Part 1 - Introduction and thematic responses (PDA-005). The Applicants have also provided an explanation of local project benefits at section 2.22 of

Reference	Written Representation Comment	Applicants' response
		<p>The Applicants' response to Hearing Action Points due at Deadline 1 - Rev F01 (REP1-037).</p> <p>Following discussion in Issue Specific Hearing 1 in relation to community benefits, and in response to Examining Authority's Hearing Action Point ISH1_31, the Applicants have updated their Statement of Reasons with information on local community benefits. The Applicants will also be undertaking further engagement on community benefits with local stakeholders as discussed in The Applicants' response to Hearing Action Points due at Deadline 1 - Rev F01 (REP1-037).</p> <p>The Applicants also provided further clarifications in relation to effects on local business and tourism in Annex 5.10 to the Applicants response to Hearing Action Points: ISH1 52 (REP1_046).</p>
REP1-193.05	There is an alternative route to Hillhouse Technology Enterprise Zone, a brownfield site at Stanah, which would benefit the area and would be welcomed by its management. Why hasn't that been looked into? It would be much less disruptive, quicker and cheaper and deliver the electricity where it could be used resulting in new employment opportunities. A win for all.	As noted above at section 1.1 Introduction, the Applicants acknowledge that a number of responses have provided comments on site selection and the assessment of alternatives including suggesting that there is an alternative route and that the Point of Interconnection for the Transmission Assets should be at or via Stanah. The Applicants provided an initial response on site selection and the assessment of alternatives at section 2.31.1 of The Applicants' Response to Relevant Representations Part 1 - Introduction and thematic responses (PDA-005). Following discussions relating to site selection and alternatives at Issue Specific Hearing 1 and in response to a number of the Examining Authority's Hearing Action Points, the Applicants provided a detailed technical response on these matters including explaining why the proposed alternative connection to Stanah is not a viable or feasible alternative route or Point of Interconnection for the Transmission Assets. This was provided at Deadline 1 in Annex 5.2 to the Applicants response to Hearing Action Points: ISH1 6, 8, 9, 19, 26 & 28 - Rev F01 (REP1-039). A summary of the position is provided at section 1.1 above.
REP1-193.06	The attitude of the applicants seems to be very blasé, almost arrogant and disrespectful to local residents and businesses and stakeholders. Any consultations with local residents, councils and businesses have been limited, incomplete and little more than a token gesture. Do they	<p>The Applicants take consultation and ongoing communications with the community seriously.</p> <p>The Applicants have previously responded to concerns in relation to Consultation in Section 2.2.2 of The Applicants' Response to Relevant Representations Part 1 - Introduction and thematic responses (PDA-005) in particular noting that the</p>

Reference	Written Representation Comment	Applicants' response
	think they needn't bother too much as they'll get permission come what may?	<p>Acceptance Checklist (s55) (PD-003) where the Planning Inspectorate confirms in relation to adequacy of consultation it "is satisfied that the Applicants have complied with their statutory obligations.". The Applicants note this was similarly acknowledged by the Examining Authority (see paragraph 30 of The Applicants' Hearing Summary of the Compulsory Acquisition Hearing 1 (REP1-036)).</p> <p>The Applicants also note that they have carried out extensive rounds of non-statutory consultation , alongside statutory consultations in accordance with the Planning Act 2008. A range of consultation events were held in the vicinity of the proposed Transmission Assets, including online events, exhibitions and pop-up events between November and December 2022, April and June 2023, and October and December 2023. These events were advertised in local newspapers, on local radio, on posters in the local area, through postcards and newsletters distributed through the local area and on social media.</p> <p>Further details can be found in the Consultation Report (APP-170).</p>
REP1-193.07	Other issues include: - traffic congestion across Fylde, damage to Moss roads, Emergency vehicle access and response times, wildlife impact, economic impact, air safety, and potential damage to historical assets dating back to the Bronze Age and Roman times.	<p>The Applicants acknowledge Mr Lewis' concerns in relation to these matters to which the Applicants provided information and responses in The Applicants' Response to Relevant Representations Part 1 - Introduction and thematic responses (PDA-005). For example, matters raised in relation to traffic and transport matters (including emergency response times) are set out in section, wildlife impacts in section 2.12, economic impact in section 2.21. and heritage and archaeology at section 2.18. The Applicants also note that they have provided further clarifications in relation to effects on local business and tourism in Annex 5.10 to the Applicants response to Hearing Action Points: ISH1 52 (REP1_046).</p> <p>The Applicants also acknowledge concerns raised at Issue Specific Hearing 1 relating to air safety linked to bird strike. The Applicants confirmed at Issue Specific Hearing 1 that engagement with BAE and Blackpool Airport is ongoing in order to agree a strategy for a bird strike management plan (see paragraphs 60 - 64 of The Applicants' Hearing Summary of Issue Specific Hearing 1 – Day 2 (REP1-035)). The Applicants also provided responses in relation to this matter at ISH1_40 of The Applicants' response to Hearing Action Points due at Deadline 1 (REP1-037) and provided further detail in relation to engagement with both BAE and Blackpool Airport in the Deadline 1</p>

Reference	Written Representation Comment	Applicants' response
		Cover letter (REP1-001). At deadline 2, the Applicants have submitted the Strategy for Wildlife Hazard Management Plan (S_D2_14) which has been shared with BAE and Blackpool Airport as part of the Applicants ongoing engagement with those bodies as explained in the Applicants responses to Blackpool Airport and BAE written representations in The Applicants Responses to Written Representations from Statutory Consultees and other organisations (S-D2_3). The Applicants will continue to actively engage with BAE and Blackpool Airport to resolve their concerns in relation to bird strike.
REP1-193.08	<p>From what I've seen and heard of the recent meetings in Blackpool, I am glad that the Inspector is requesting detailed information from the applicants that they should have provided.</p> <p>Hopefully the Inspector will also tell the applicants to take a look at the alternative route to Stanah, precedents have been set I believe by Stonehenge and Langley Park School judgements</p>	The Applicants note they have responded fully to requests for further information from the Examining Authority and will continue to do so throughout the Examination of the Transmission Assets. The Applicants refer Mr Lewis to their response at REP1-193.05 above in relation to the suggested alternative route to Stanah and note that Section 2 and Section 4.1 of Annex 5.2 to the Applicants response to Hearing Action Points: ISH1 6, 8, 9, 19, 26 & 28 - Rev F01 (REP1-039) specifically discuss the cases referenced.

## 2.34 Rosaleen Forsey (REP1-194)

**Table 2.31: REP1-194 – Rosaleen Forsey**

Reference	Written Representation Comment	Applicants' response
REP1-194.01	<p>The Hearings</p> <p>I would like to express disappointment at the lack of engagement by the applicant and it's representative's and the repeated inadequacy of responses to questions and</p>	The Applicants note Ms Forsey's comments. The Applicants sought to assist the Examining Authority and those attending the hearings by providing clear and comprehensive answers to the questions and points raised wherever possible. Any matters that could not be dealt with comprehensively at the hearings have now been

Reference	Written Representation Comment	Applicants' response
	<p>concerns raised by individual members of the community and representatives of community organisations during the recent hearings in Blackpool. Multiple questions and requests for information were met by the huge team representing the applicant with dismissive comments, silence or excuses as to why this information was not available. Given these hearings had been scheduled for a while and we as unpaid interested parties were able to show up, prepared and ready to participate, it seems astonishing that this group of paid representatives seemed unable to do the same. Even basic questions about disruption to emergency services, bird strikes in the vicinity of Blackpool Airport, the destruction of the dunes and overall project timescales and the reasons behind them, went inadequately or wholly unanswered. Never have I witnessed a group of individuals so underprepared for the task at hand, even at a basic community level, never mind representatives of a huge infrastructure project of this nature. If this isn't cause for concern enough there were several points during the proceedings when the behaviour of the applicant's representatives conveyed disrespect, bordering on contempt for the stakeholders, especially the local residents bravely enough to speak. I witnessed one resident having to ask a member of the M&amp;M team to stop smiling and while she was sharing her concerns. On another occasion the applicant's legal representative could be heard muttering under her breath, 'it's only a cable'! I found this offensive and unacceptable.</p> <p>The proposals themselves were represented in a haphazard, seemingly ad hoc manner giving an impression of ill-preparedness. This alone must surely raise questions about the applicant's ability to coordinate a project of this magnitude with all its unprecedented complexities and unmitigated risks.</p>	<p>responded to in writing either through the Applicants' hearing summaries (REP1-034, REP1-035 or REP1-036) or responses to the Examining Authority's Hearing Action Points (REP1-037 through to REP1-046).</p> <p>The Applicants are aware of the concerns of local residents and members of the public regarding the Transmission Assets proposals. The Applicants have previously provided information and responses to these concerns in The Applicants' Response to Relevant Representations Part 1 - Introduction and thematic responses (PDA-005). For example, matters raised in relation to traffic and transport matters (including emergency response times) are set out in section 2.32 and impacts on the sand dunes at section 2.30.</p> <p>In relation to air safety linked to bird strike, the Applicants confirmed at Issue Specific Hearing 1 that engagement with BAE and Blackpool Airport is ongoing in order to agree a strategy for a bird strike management plan (see paragraphs 60 - 64 of The Applicants' Hearing Summary of Issue Specific Hearing 1 – Day 2 (REP1-035)). The Applicants also provided responses in relation to this matter at ISH1_40 of The Applicants' response to Hearing Action Points due at Deadline 1 (REP1-037) and provided further detail in relation to engagement with both BAE and Blackpool Airport in the Deadline 1 Cover letter (REP1-001). At deadline 2, the Applicants have submitted the Strategy for Wildlife Hazard Management Plan (S_D2_14) which has been shared with BAE and Blackpool Airport as part of the Applicants ongoing engagement with those bodies as explained in the Applicants responses to Blackpool Airport and BAE written representations in The Applicants Responses to Written Representations from Statutory Consultees and other organisations (S_D2_3). The Applicants will continue to actively engage with BAE and Blackpool Airport to resolve their concerns in relation to bird strike.</p> <p>In relation to overall construction periods the Applicants have provided consideration of potential construction scenarios and durations in their Rule 9 - ES assessment of Construction Scenarios (AS-070) at Section 1.5. The Applicants further explained their approach to construction scenarios and coordination between Morgan OWL and</p>

Reference	Written Representation Comment	Applicants' response
	Further concerning evidence of ineptitude and fragmented thinking was evident in the news that the applicant has now, without public consultation, notification or publicity apparently now escalated the estimated length of the project from 6 to 11 years in the space of just a few months! This change was explained away at the hearings as being related to the needs of the respective shareholders of both partners who jointly make up 'the applicant', and that shareholder needs were in effect the ultimate priority here ... over and above the requirements of local community and Net Zero itself. The subsequent clumsy presentation of the necessity of a sequential, as opposed to concurrent style of project construction with utter disregard for the needs of local farmers and the safety of beach users and those living in the airport flight path gives rise to further serious concern about who's needs and concerns are being prioritised here.	Morecambe OWL at Issue Specific Hearing 1 (see in particular paragraphs 11 - 34 of The Applicants' Hearing Summary of Issue Specific Hearing 1 – Day 2 (REP1-035)). Following the hearings, the Applicants have also provided further clarification about out how Morgan OWL and Morecambe OWL will continue to work together post consent to deliver the two projects comprised within the Transmission Assets with a view to minimising impacts on local communities wherever practicable. This is set out in Section 7 of Annex 5.2 to the Applicants response to Hearing Action Points: ISH1 6, 8, 9, 19, 26 & 28 - Rev F01 (REP1-039).
REP1-194.02	<p>The Beach</p> <p>Contradictory answers and comments were given to members of the public regarding the beach closure at St Anne's and the huge potential impact of this on the local and visiting community, was minimised. We have previously been told that the beach in question would be closed for two years and there seemed to be confusion amongst the applicants expert team during the hearings as to whether this meant total closure, partial closure or sporadic closure? The fact is that from the point of view of beach users whether or not this relates to the entire beach or sections there of, what is clear is that the beach would be in effect a building site and as such, wholly unusable by anyone for the duration of the proposed work. Now the project has been extended to 11 years we can only assume in the absence of any clear answers even after</p>	<p>The Applicants previously addressed concerns relating to beach access in section 2.5 of The Applicants' Response to Relevant Representations Part 1 - Introduction and thematic responses (PDA-005). Following the discussions at the Hearings, and in response to Hearing Action Points, the Applicants provided further detailed technical clarifications in relation to beach access in Annex 5.3 to the Applicants response to Hearing Action Points: ISH1 13, 14, 16, 17 (REP1-040).</p> <p>Further details of the public access to the beach during construction is set out in The Outline Open Space Management Plan which is at Appendix A of the Outline Public Rights of Way (PRoW) Management Plan (AS-048). This sets out the discrete working areas that will be subject to access management during construction works.</p>

Reference	Written Representation Comment	Applicants' response
	<p>closely following almost 4 days of hearings, that the beach will be closed now for much longer than 2 years. The local community around this beach are not comprised of wealthy people, many are retired public sector workers and a good proportion, like myself, reliant on public transport whether for reasons of [redacted] or low resources. This beach is the place where we seek to maintain our physical and mental health daily via the exercise and fresh air it affords us. Many of us can't afford to run a car and this beach is the reason we moved to this part of the Fylde. As the project has now pretty much doubled in timescale, it's reasonable in the absence of any concrete alternative information to assume that the beach closure/inaccessibility would be doubled too - so we'd be looking at 4 years closure. These proposals will make this beach inaccessible for this duration, whether through complete closure or the restrictions caused by dust, debris and noise and I put it to you that there are people here in my community who will not be alive in 4 years time. This project will therefore mean that for the final years of their lives, they/we, will be destined to live out our time - following lives of service as teachers, nurses, paramedics, care workers, service and retail workers, trapped on a filthy, noisy building site. I would argue that this breaches our human rights denying us the peaceful and safe enjoyment of our homes during our final years.</p>	
REP1-194.03	<p>The Dunes, Ecology and Flooding</p> <p>There is also the issue of the disturbance and potential destruction of our dunes as there is an ecosystem here that has not been adequately considered by the applicant. Our dunes provide this part of the Fylde with our only effective, sustained flood defence and it remains unclear</p>	<p>The Applicants acknowledge that a number of representations have raised concerns relating to the sand dunes and impacts on Lytham St Annes SSSI. The Applicants have previously addressed concerns relating to the sand dunes at section 2.30 of The Applicants' Response to Relevant Representations Part 1 - Introduction and thematic responses (PDA-005). Further to this, the Applicants are in ongoing dialogue with the Environment Agency (EA) to actively engage with the Environment Agency to resolve their concerns including those relating to the Lytham St Annes SSI (sand dunes) as set out at ISH1_49 of The Applicants' response to Hearing Action Points due at Deadline 1</p>

Reference	Written Representation Comment	Applicants' response
	<p>whether all aspects of the questions posed regarding flooding and drainage have been fully accounted for.</p> <p>Examples of this relate to mitigation of the issues of interrupting the drainage water courses by the building work especially if it is not known exactly what has been done previously and these works lie hidden below ground. Messing with our dunes is more than a matter of digging a tunnel which will then be filled in like a sandcastle, any disruption of the dunes messes with the safety and wellbeing of the local community, hugely increasing the likelihood of flooding and making any kind of insurance unaffordable or unavailable. Our uninsured homes will almost certainly be unprotected and become flooded at some point as a direct result.</p>	<p>(REP1-037). This includes providing a preliminary hydrogeological risk assessment in relation to the trenchless installation beneath Lytham St Annes SSSI at Deadline 3.</p>
REP1-194.04	<p>The Airport, Safety and Birdstrikes</p> <p>An additional concern for those living around the beach is that we are also living in the flight path of Blackpool Airport. Concerns raised by residents re birdstrike management were dismissed with one resident when asking related questions about community safety and risk to life, needing to request during the hearing that a member of the M&amp;M team refrain from grinning and laughing while she was speaking. Appalling and shocking to witness. The lack of BAE engagement and apparent refusal to organise a survey leaves us aghast when all that was offered during the hearings was a comment about mitigation on bird strikes not being possible and that as we can't mitigate now, we don't need to mitigate in the future despite the fact that the disruption of bird breeding and roosting sites will undoubtedly lead to a much increased risk. When a resident raised this she was admonished by the applicants legal representative for her use of evocative language!</p>	<p>The Applicants acknowledge concerns raised at Issue Specific Hearing 1 relating to air safety linked to bird strike. The Applicants take all safety matters seriously. The Applicants confirmed at Issue Specific Hearing 1 that engagement with BAE is ongoing in order to agree a strategy for a bird strike management plan (see paragraphs 60 - 64 of The Applicants' Hearing Summary of Issue Specific Hearing 1 – Day 2 (REP1-035)). The Applicants also provided responses in relation to this matter at ISH1_40 of The Applicants' response to Hearing Action Points due at Deadline 1 (REP1-037) and provided further detail in relation to engagement with both BAE and Blackpool Airport in the Deadline 1 Cover letter (REP1-001). At deadline 2, the Applicants have submitted the Strategy for Wildlife Hazard Management Plan (S_D2_14) which has been shared with BAE and Blackpool Airport as part of the Applicants ongoing engagement with those bodies as explained in the Applicants' responses to Blackpool Airport and BAE written representations in The Applicants Responses to Written Representations from Statutory Consultees and other organisations (S_D2_3). The Applicants will continue to actively engage with BAE and Blackpool Airport to resolve concerns in relation to bird strike.</p>

Reference	Written Representation Comment	Applicants' response
REP1-194.05	<p>Any reduction in the quality of (the permanent) habitat at Newton March, Lytham Moss, Freckleton Marsh and Lea Marsh to discourage birds from visiting it will have a consequential effect on the biodiversity score so it may not be possible to satisfy BNG requirements (admittedly not yet a legal obligation but recommended in policy) and avoid increasing bird strike risk. The proposed habitat can be found on page 56 of APP-106</p> <p>These points were summarily dismissed as BNG was not a legal requirement despite this being a government intention, that the applicant was seeking to meet it, and would be a legal requirement later this year.</p> <p>It's clear that the only way to move forward with this safely is to strongly consider one of the proposed alternative routes.</p>	<p>The Applicants confirm that the only permanent habitat loss is associated with the onshore substations. The Applicants have committed to (COT 120 of Volume 1: Annex 5.3 Commitments Register (F1.5.3/F03) to provide a permanent mitigation area south of Newton with Scales for waders and farmland birds. Further details on the mitigation area can be found within the Outline Ecological Management Plan (J6/F02). Detailed Ecological Management Plan(s) will be developed in accordance with the Outline Ecological Management Plan which is secured by Requirement 12 of Schedules 2A &amp; 2B of the draft DCO (C1/F04). The rest of the areas within the Transmission Assets Order Limits would not be subject to permanent habitat loss and therefore the birds will still be able to reside in these areas as usual.</p>
REP1-194.06	<p><b>Emergency Vehicle Impact</b></p> <p>Because of the location of Blackpool Airport, there are only two north / south major arterial roads between Blackpool and St Anne's. One is Clifton Drive to the west of the airport and the other is Queensway to the east of the airport. Both roads become major bottlenecks when planned roadworks are carried out on just one side of the airport, causing long queues of traffic and severe delays. Both these roads will need to be crossed by the proposed cable route.</p> <p>There does not seem to be any 'emergency vehicle impact statement' in relation to access by Police, Fire, Ambulance and Coastguard emergency vehicles and when this was questioned at the hearings the response was that emails sent to the various emergency services had gone unanswered and not followed up!</p>	<p>The Applicants have assessed the potential impact of the Transmission Assets on emergency services in Volume 3, Chapter 7: Traffic and Transport (APP-108) which considers the Transmission Assets traffic in relation to driver delay, severance, non-motorised user delay, fear and intimidation, road safety and abnormal loads. The assessment concludes (with the application of the mitigation measures described below) that the residual effects upon all road users (including emergency services) would not be significant in Environmental Impact Assessment (EIA) terms which means that further mitigation is not required.</p> <p>The Applicants highlight that extensive commitments have been made to the use of trenchless installation techniques, such as Horizontal Directional Drilling (HDD) to minimise disruption to all A, B and Classified roads (with the exception of Leach Lane) and railways proposed to be crossed by the Transmission Assets (see CoT02, Volume 1, Annex 5.3: Commitments Register (F 1.5.3/F03)). This commitment to the use of trenchless techniques is secured via Requirement 8 (Code of Construction Practice) of Schedules 2A and 2B of the draft DCO (REP1-008). With regard to Leach Lane, the Applicants have committed to maintaining access, with works completed on a 'half / half basis' with traffic to be controlled through the use of temporary traffic</p>

Reference	Written Representation Comment	Applicants' response
		<p>management, such as traffic signals. The open cut trenching on Leach Lane is not expected to result in any road closures and vehicular access would always be maintained including for emergency services and for buses. The approach to managing highway crossings is outlined in Section 1.10 of the Outline Construction Traffic Management Plan (OCTMP) (J5/F02). The requirement to produce the detailed CTMP(s) in accordance with the OCTMP in consultation with, and for approval by, the relevant highway authority, is secured by Requirement 9 of Schedules 2A and 2B of the draft DCO (REP1-008).</p> <p>Subject to the grant of the DCO, the Applicants would note that the effects of construction traffic and highway works from Transmission Assets would be managed, monitored and controlled through the development of the detailed CTMPs. In compliance with Requirement 9, the detailed CTMPs would need to be agreed with the relevant highway authorities. In approving the detailed CTMPs the relevant highway authorities would apply their statutory duties under the Traffic Management Act, 2004 to ensure the "expeditious movement of traffic on the authority's road network" which includes emergency services.</p>

## 2.35 Samantha Pilgrim (REP1-197)

**Table 2.32: REP1-197 – Samantha Pilgrim**

Reference	Written Representation Comment	Applicants' response
REP1-197.01	Further to the recent consultation meetings, I want to add further comments. It seems the applicant/s have done the absolute minimum by way of investigating the full details and consequences of the proposed route. They have failed to carry out full and proper surveys with regard to the impact on wildlife (including protected species), traffic (the	The Applicants acknowledge Ms Pilgrim's concerns. The Applicants previously provided information and responses in relation to these concerns in The Applicants' Response to Relevant Representations Part 1 - Introduction and thematic responses (PDA-005). For example, matters raised in relation to impacts on wildlife are set out in section 2.12, sand dunes at section 2.30, traffic and transport matters in section 2.32, beach access in section 2.5 and local economy (including disruption to local

Reference	Written Representation Comment	Applicants' response
	<p>lack of roads in the area and existing issues of congestion), tourism - potential for many years of disruption to the beach and roads, which could be devastating to the local economy. They have sought to minimise the disruption by being economical with the truth. Describing the drilling as "trenchless" makes it sound less intrusive, but there will still be access points in and out of the drilling points, as well as the need for compounds to store equipment, noise, dust etc. The applicant is vague about how long the project might take and that the work might be done in phases, meaning further disruption and possible permanent, irreversible damage to sand dunes, farming land, wildlife, tourism.</p> <p>They are reluctant to take responsibility for the decision-making by stating it is National Grid's decision. They have given no reasons at all for the lack of consideration into the alternative, much more viable route at Hillhouse.</p>	<p>communities and businesses) at section 2.21. The Applicants also note that further clarifications in relation to a number of these matters have been provided in response to Hearing Action Points at Deadline 1 including:</p> <ul style="list-style-type: none"> <li>- ISH1_49 of The Applicants' response to Hearing Action Points due at Deadline 1 (REP1-037) in relation to engagement with the Environment Agency to resolve concerns relating to trenchless installation beneath the sand dunes (Lytham St Annes SSSI);</li> <li>- Annex 5.3 to the Applicants response to Hearing Action Points: ISH1 13, 14, 16, 17 (REP1-040) in relation to beach access and construction works either side of the care home; and</li> <li>- Annex 5.10 to the Applicants response to Hearing Action Points: ISH1 52 (REP1_046) in relation to effects on local business and tourism.</li> <li>- ISH1_23 of The Applicants' response to Hearing Action Points due at Deadline 1 (REP1-037) in relation to the concerns about phases of the project. This also notes the drafting updates made to the draft DCO (REP1-008) at deadline 1 for consistency and as further recognition that all parts of Project A will be constructed in one overall phase and all parts of Project B will be constructed in one overall phase.</li> </ul> <p>In relation to overall construction periods the Applicants have provided consideration of potential construction scenarios and durations in their Rule 9 - ES assessment of Construction Scenarios (AS-070) at Section 1.5. The Applicants further explained their approach to construction scenarios and coordination between Morgan OWL and Morecambe OWL at Issue Specific Hearing 1 (see in particular paragraphs 11 - 34 of The Applicants' Hearing Summary of Issue Specific Hearing 1 – Day 2 (REP1-035)). Following the hearings, the Applicants have also provided further clarification about out how Morgan OWL and Morecambe OWL will continue to work together post consent to deliver the two projects comprised within the Transmission Assets with a view to minimising impacts on local communities wherever practicable. This is set out in Section 7 of Annex 5.2 to the Applicants response to Hearing Action Points: ISH1 6, 8, 9, 19, 26 &amp; 28 - Rev F01 (REP1-039).</p>

Reference	Written Representation Comment	Applicants' response
		<p>The Applicants acknowledge that a number of responses have provided comments on site selection and the assessment of alternatives including suggesting that there is an alternative route and that the Point of Interconnection for the Transmission Assets should be at or via Stanah. The Applicants provided an initial response on site selection and the assessment of alternatives at section 2.31.1 of The Applicants' Response to Relevant Representations Part 1 - Introduction and thematic responses (PDA-005). Following discussions relating to site selection and alternatives at Issue Specific Hearing 1 and in response to a number of the Examining Authority's Hearing Action Points, the Applicants provided a detailed technical response on these matters including explaining why the proposed alternative connection to Stanah is not a viable or feasible alternative route or Point of Interconnection for the Transmission Assets. This was provided at Deadline 1 in Annex 5.2 to the Applicants response to Hearing Action Points: ISH1 6, 8, 9, 19, 26 &amp; 28 - Rev F01 (REP1-039). A summary of the position is provided at section 1.1 above.</p>

## 2.36 Sarah Louise Banister (REP1-199)

**Table 2.33: REP1-199 – Sarah Louise Banister**

Reference	Written Representation Comment	Applicants' response
REP1-199.01	<p>As a resident of Freckleton consider that a much shorter, cheaper, less damaging alternative can connect to Penwortham via Stanah, using an existing National Grid line, already 400KVcapable, with cost savings estimated at £903mat current prices. The alternative would use a designated brownfield site, and create jobs in one of the most deprived areas of Lancashire in future energy intensive, green hydrogen production, dismiss its feasibility, opting for complex solutions. The applicants</p>	<p>The Applicants acknowledge that a number of responses have provided comments on site selection and the assessment of alternatives including suggesting that there is an alternative route, and that the Point of Interconnection for the Transmission Assets should be at or via Stanah. The Applicants provided an initial response on site selection and the assessment of alternatives at section 2.31.1 of The Applicants' Response to Relevant Representations Part 1 - Introduction and thematic responses (PDA-005). Following discussions relating to site selection and alternatives at Issue Specific Hearing 1 and in response to a number of the Examining Authority's Hearing Action Points, the Applicants provided a detailed technical response on these matters</p>

Reference	Written Representation Comment	Applicants' response
	avoid responsibility for landfall decisions, deferring to National Grid and hence they have opted for a conflicted, all new, cross-Greenbelt route	including explaining why the proposed alternative connection to Stanah is not a viable or feasible alternative route or Point of Interconnection for the Transmission Assets. This was provided at Deadline 1 in Annex 5.2 to the Applicants response to Hearing Action Points: ISH1 6, 8, 9, 19, 26 & 28 - Rev F01 (REP1-039). A summary of the position is provided at section 1.1 above.
REP1-199.02	Concerns arise over site selection, extended construction periods, and lack of benefits to local communities.	<p>The Applicants refer to response REP1-199.01 above with regards to site selection.</p> <p>In relation to overall construction periods the Applicants have provided consideration of potential construction scenarios and durations in their Rule 9 - ES assessment of Construction Scenarios (AS-070) at Section 1.5. The Applicants further explained their approach to construction scenarios and coordination between Morgan OWL and Morecambe OWL at Issue Specific Hearing 1 (see in particular paragraphs 11 - 34 of The Applicants' Hearing Summary of Issue Specific Hearing 1 – Day 2 (REP1-035)). Following the hearings, the Applicants have also provided further clarification in relation to construction scenarios and coordination Annex 5.2 to the Applicants response to Hearing Action Points: ISH1 6, 8, 9, 19, 26 &amp; 28 - Rev F01 (REP1-039).</p> <p>In relation to benefits to local communities, following discussion in Issue Specific Hearing 1, and in response to Examining Authority's Hearing Action Point ISH1_31, the Applicants have updated their Statement of Reasons with information on local community benefits. The Applicants will also be undertaking further engagement on community benefits with local stakeholders as discussed in The Applicants' response to Hearing Action Points due at Deadline 1 - Rev F01 (REP1-037).</p>
REP1-199.03	Consultation efforts are insufficient, leading to stakeholder frustration.	<p>The Applicants take consultation and ongoing communications with stakeholders and the community seriously.</p> <p>The Applicants have previously responded to concerns raised in relation to Consultation in Section 2.2.2 of The Applicants' Response to Relevant Representations Part 1 - Introduction and thematic responses (PDA-005) in particular noting that the Acceptance Checklist (s55) (PD-003) where the Planning Inspectorate confirms in relation to adequacy of consultation it "is satisfied that the Applicants have complied with their statutory obligations.". The Applicants note this was similarly</p>

Reference	Written Representation Comment	Applicants' response
		<p>acknowledged by the Examining Authority (see paragraph 30 of The Applicants' Hearing Summary of the Compulsory Acquisition Hearing 1 (REP1-036)).</p> <p>The Applicants also note that they have carried out extensive rounds of non-statutory consultation, alongside statutory consultations in accordance with the Planning Act 2008. A range of consultation events were held in the vicinity of the proposed Transmission Assets, including online events, exhibitions and pop-up events between November and December 2022, April and June 2023, and October and December 2023. These events were advertised in local newspapers, on local radio, on posters in the local area, through postcards and newsletters distributed through the local area and on social media.</p> <p>Further details can be found in the Consultation Report (APP-170).</p>
REP1-199.04	Agricultural impacts include prolonged and permanent land loss and disruption.	<p>The Applicants addressed concerns relating to agricultural land impacts at section 2.3 of The Applicants' Response to Relevant Representations Part 1 - Introduction and thematic responses (PDA-005) which sets out how the Applicants have sought to minimise impacts on agricultural land.</p> <p>Potential impacts on farm holdings and agricultural land were also discussed at Issue Specific Hearing 1 (see paragraphs 65 – 75 of The Applicants' Hearing Summary of Issue Specific Hearing 1 – Day 2 (REP1-035)) and Compulsory Acquisition Hearing 1 (see paragraph 22 of The Applicants' Hearing Summary of Compulsory Acquisition Hearing 1 (REP1-036)) following which the Applicants have responded to a number of Hearing Action Points relating to these matters. Please see ISH1_46, ISH1_47 and CAH1_5 of The Applicants' response to Hearing Action Points due at Deadline 1 (REP1-037).</p>
REP1-199.05	Beach access at St Anne's faces likely closures with out mitigation plans.	<p>The Applicants previously addressed concerns relating to beach access in section 2.5 of The Applicants' Response to Relevant Representations Part 1 - Introduction and thematic responses (PDA-005). Following the discussions at the Hearings, and in response to Hearing Action Points, the Applicants provided further detailed technical clarifications in relation to beach access in Annex 5.3 to the Applicants response to Hearing Action Points: ISH1 13, 14, 16, 17 (REP1-040).</p>

Reference	Written Representation Comment	Applicants' response
		Further details of the public access to the beach during construction is set out in The Outline Open Space Management Plan which is at Appendix A of the Outline Public Rights of Way (PRoW) Management Plan (AS-048). This sets out the discrete working areas that will be subject to access management during construction works.
REP1-199.06	Air safety concerns remain unresolved due to poor engagement with BAE Systems.	The Applicants acknowledge concerns raised at Issue Specific Hearing 1 relating to air safety linked to bird strike. The Applicants take all safety matters seriously. The Applicants confirmed at Issue Specific Hearing 1 that engagement with BAE and Blackpool Airport is ongoing in order to agree a strategy for a bird strike management plan (see paragraphs 60 - 64 of The Applicants' Hearing Summary of Issue Specific Hearing 1 – Day 2 (REP1-035)). The Applicants also provided responses in relation to this matter at ISH1_40 of The Applicants' response to Hearing Action Points due at Deadline 1 (REP1-037) and provided further detail in relation to engagement with both BAE and Blackpool Airport in the Deadline 1 Cover letter (REP1-001). At deadline 2, the Applicants have submitted the Strategy for Wildlife Hazard Management Plan (S_D2_14) which has been shared with BAE and Blackpool Airport as part of the Applicants ongoing engagement with those bodies as explained in the Applicants' responses to Blackpool Airport and BAE written representations in The Applicants Responses to Written Representations from Statutory Consultees and other organisations (S_D2_3). The Applicants will continue to actively engage with BAE and Blackpool Airport to resolve concerns in relation to bird strike.
REP1-199.07	Emergency access for blue light vehicles during the construction period would create a danger to residents.	<p>The Applicants have assessed the potential impact of the Transmission Assets on emergency services in Volume 3, Chapter 7: Traffic and Transport (APP-108) which considers the Transmission Assets traffic in relation to driver delay, severance, non-motorised user delay, fear and intimidation, road safety and abnormal loads. The assessment concludes (with the application of the mitigation measures described below) that the residual effects upon all road users (including emergency services) would not be significant in Environmental Impact Assessment (EIA) terms which means that further mitigation is not required.</p> <p>The Applicants highlight that extensive commitments have been made to the use of trenchless installation techniques, such as Horizontal Directional Drilling (HDD) to minimise disruption to all A, B and Classified roads (with the exception of Leach Lane) and railways proposed to be crossed by the Transmission Assets (see CoT02, Volume</p>

Reference	Written Representation Comment	Applicants' response
		<p>1, Annex 5.3: Commitments Register (F 1.5.3/F03)). This commitment to the use of trenchless techniques is secured via Requirement 8 (Code of Construction Practice) of Schedules 2A and 2B of the draft DCO (REP1-008). With regard to Leach Lane, the Applicants have committed to maintaining access, with works completed on a 'half / half basis' with traffic to be controlled through the use of temporary traffic management, such as traffic signals. The open cut trenching on Leach Lane is not expected to result in any road closures and vehicular access would always be maintained including for emergency services and for buses. The approach to managing highway crossings is outlined in Section 1.10 of the Outline Construction Traffic Management Plan (OCTMP) (J5/F02). The requirement to produce the detailed CTMP(s) in accordance with the OCTMP in consultation with, and for approval by, the relevant highway authority, is secured by Requirement 9 of Schedules 2A and 2B of the draft DCO (REP1-008).</p> <p>Subject to the grant of the DCO, the Applicants would note that the effects of construction traffic and highway works from Transmission Assets would be managed, monitored and controlled through the development of the detailed CTMPs. In compliance with Requirement 9, the detailed CTMPs would need to be agreed with the relevant highway authorities. In approving the detailed CTMPs the relevant highway authorities would apply their statutory duties under the Traffic Management Act, 2004 to ensure the "expeditious movement of traffic on the authority's road network" which includes emergency services.</p>
REP1-199.08	Community benefits remain undefined despite available government guidance.	Following discussion in Issue Specific Hearing 1 in relation to community benefits, and in response to Examining Authority's Hearing Action Point ISH1_31, the Applicants have updated their Statement of Reasons with information on local community benefits. The Applicants will also be undertaking further engagement on community benefits with local stakeholders as discussed in The Applicants' response to Hearing Action Points due at Deadline 1 - Rev F01 (REP1-037).
REP1-199.09	Existing and proposed energy projects threaten to overwhelm greenbelt areas.	In response to concerns in relation to the use of green belt, the Applicants previously provided a response to these concerns at section 2.17 and 2.31 of The Applicants' Response to Relevant Representations Part 1 - Introduction and thematic responses (PDA-005). Site selection and green belt was discussed further at Issue Specific Hearing 1 and the Applicants refer in particular to paragraphs 17 -21 and 49 to 54 of The Applicants' Hearing Summary of Issue Specific Hearing 1 – Day 2 (REP1-035).

Reference	Written Representation Comment	Applicants' response
		The Applicants have also provided further clarifications in relation to site selection and green belt in response to Hearing Action Points following the hearings. Specifically, the Applicants refer to ISH_7 of The Applicants' response to Hearing Action Points due at Deadline 1 (REP1-037).
REP1-199.010	The cumulative impacts of substations, cabling, and solar farms lack adequate assessment.	The Applicants consider their assessment of cumulative effects is adequate and provided a response to concerns raised in relation to cumulative impacts at section 2.10 of The Applicants' Response to Relevant Representations Part 1 - Introduction and thematic responses (PDA-005). The Applicants also provided further information in relation to cumulative effects in response to Hearing Action Point ISH1_29 within The Applicants' response to Hearing Action Points due at Deadline 1 (REP1-037) and, as noted in that response, have provided a Review of Cumulative Effects Assessment and In-Combination Assessment at Deadline 2 (S_D2_10).
REP1-199.011	Biodiversity concerns persist, with protected bird species inhabiting affected areas.	The Applicants have previously responded to concerns relating to biodiversity matters at section 2.12 of The Applicants' Response to Relevant Representations Part 1 - Introduction and thematic responses (PDA-005). A number of biodiversity matters were discussed at Issue Specific Hearing 1. In response to ISH_39, the Applicants have submitted a note on Site Selection of the Environmental Mitigation and Biodiversity Benefit Areas (S_D2_13) at Deadline 2. The Applicants note that they have also submitted a Strategy for Wildlife Hazard Management Plan (S_D2_14), updated outline Ecological Management Plan (J6/F02) and an updated Biodiversity Benefit Statement (J11/F03) at Deadline 2 which seek to address various concerns raised in relation to biodiversity including birds.
REP1-199.012	Temporary land use remains unaccounted for in biodiversity net gain(BNG) calculations.	The Applicants confirmed at Issue Specific Hearing 1 that there is no legal requirement for the Transmission Assets to provide BNG and as such, it is being provided on a voluntary basis. (See paragraph 86 of The Applicants' Hearing Summary of Issue Specific Hearing 1 – Day 2 (REP1-035).) The Applicants Onshore Biodiversity Benefit Statement (J11/F03) explains the approach taken by the Applicants and confirms that the calculation undertaken for biodiversity benefit utilises the latest Defra Biodiversity Metric (version 4.1) in line with guidance and NPS EN-1.

Reference	Written Representation Comment	Applicants' response
REP1-199.013	All of these issues are worsened by the refusal of the applicants to consider any alignment of their works leading to a potential 10 year period of disruption.	The Applicants explained their approach to construction scenarios and coordination between Morgan OWL and Morecambe OWL at Issue Specific Hearing 1 (see in particular paragraphs 11 - 34 of The Applicants' Hearing Summary of Issue Specific Hearing 1 – Day 2 (REP1-035)). Following the hearings, the Applicants provided a detailed technical response to these points within Annex 5.2 to the Applicants response to Hearing Action Points: ISH1 6, 8, 9, 19, 26 & 28 - Rev F01 (REP1-039). Section 7 of REP1-039 sets out how Morgan OWL and Morecambe OWL will continue to work together post consent to deliver the two projects comprised within the Transmission Assets. Section 8 of REP1-039 clearly explains why flexibility must be retained within the draft DCO (REP1-008) to allow for the projects to be constructed in different ways and why Morgan OWL and Morecambe OWL cannot commit to concurrent construction within the draft DCO.
REP1-199.014	Ultimately, the alternative route offers a more direct, cost-efficient, and environmentally viable solution that has been ignored by applicants.	The Applicants refer Ms Banister to the Applicants response at REP1—199.01 above.

## 2.37 Steven Robert Baxendale (REP1-203)

**Table 2.34: REP1-203 – Steven Robert Baxendale**

Reference	Written Representation Comment	Applicants' response
REP1-203.01	<p>I thank you for the opportunity to register my disapproval of the above project.</p> <p>My main concern is the potential upheaval on Kirkham Road. I am operating a funeral business here, and I am concerned that timetables will be disrupted. This is of</p>	The Applicants acknowledge Mr Baxendale's concerns relating to business disruption. The Applicants have previously addressed concerns relating to disruption to local communities and businesses at section 2.21 of The Applicants' Response to Relevant Representations Part 1 - Introduction and thematic responses (PDA-005). The Applicants have also provided further clarifications in relation to effects on local

Reference	Written Representation Comment	Applicants' response
	<p>course very important when funerals are concerned. If vehicles are delayed this</p> <p>would cause distress to the families concerned as well as problems with visiting traffic to this address, which is very near to the proposed crossing. Also, I believe that there would be a seriously adverse effect on the profitability of my business</p>	<p>businesses in Annex 5.10 to the Applicants response to Hearing Action Points: ISH1 52 (REP1_046).</p>
REP1-203.02	<p>Another concern is that this road is used by children walking to and from Strike Lane School, many unaccompanied by an adult. Inevitably there would be accidents particularly during the winter months.</p>	<p>The Applicants responded to concerns raised relating to schools and travel routes at 2.32 of The Applicants' Response to Relevant Representations Part 1 - Introduction and thematic responses (PDA-005).</p> <p>The Applicants have undertaken an assessment of vulnerable groups within the Human Health Annex (APP-035) which includes consideration of impacts on young people and schools including traffic related impacts and summarises relevant mitigation measures to manage and minimise potential impacts during construction and operation of the Transmission Assets.</p>
REP1-203.03	<p>I am also concerned about the very large buildings which are proposed. In my view they would be a hideous blot on the landscape, in what is now one of the few areas of pleasant countryside in this part of the world. Furthermore, it is more than likely that ultimately there would be additional works and buildings.</p>	<p>The Applicants acknowledge Mr Baxendale's concerns around the size of each project's substation buildings. The Applicants have assessed potential adverse impacts, including landscape impacts, through their environmental impact assessment reported through the relevant chapters of the Environmental Statement (ES). The ES identifies appropriate mitigation measures to minimise those impacts which are secured through the Requirements set out in Schedules 2A and 2B of the draft DCO (REP1-008). For example, the Applicants note that the substations are subject to a number of controls including Requirements 4 (substation works), 5(1) (Detailed design parameters onshore), 15 (Fencing and other means of enclosure), 17 (Control of operational artificial light emissions), 18 (Control of noise during operational stage) and 20 (Operational drainage management plan) of Schedules 2A and 2B of the draft DCO (REP1-008). Further, in relation to landscape matters, they are also subject to measures contained within the outline Landscape Management Plan (AS-050) pursuant to Requirements 6 and 7 of Schedules 2A and 2B of the draft DCO (REP1-008).</p>

Reference	Written Representation Comment	Applicants' response
REP1-203.04	I believe that there would be problems with dust and noise which is detrimental to all local people, especially considering the length of time that would be necessary for these works to take place.	The Applicants have previously responded to concerns relating to dust and noise within sections 2.4, 2.9 and 2.24 of The Applicants' Response to Relevant Representations Part 1 - Introduction and thematic responses (PDA-005).
REP1-203.05	Along with most local people I think that the project is unacceptable, particularly when there is a reasonable alternative.	The Applicants note this response. The Applicants acknowledge that a number of responses have provided comments on site selection and the assessment of alternatives including suggesting that there is an alternative route, and that the Point of Interconnection for the Transmission Assets should be at or via Stanah. The Applicants provided an initial response on site selection and the assessment of alternatives at section 2.31.1 of The Applicants' Response to Relevant Representations Part 1 - Introduction and thematic responses (PDA-005). Following discussions relating to site selection and alternatives at Issue Specific Hearing 1 and in response to a number of the Examining Authority's Hearing Action Points, the Applicants provided a detailed technical response on these matters including explaining why the proposed alternative connection to Stanah is not a viable or feasible alternative route or Point of Interconnection for the Transmission Assets. This was provided at Deadline 1 in Annex 5.2 to the Applicants response to Hearing Action Points: ISH1 6, 8, 9, 19, 26 & 28 - Rev F01 (REP1-039). A summary of the position is provided at section 1.1 above.

## 2.38 Susan Dooney (REP1-204)

- 2.38.1.1 The Applicants note this is a copy of the Written Representation by Newton with Clifton and Freckleton Parish Council (REP1-183), so please see Document S\_D2\_3.4 Annex 3.4 to Applicants' Response to WRs from Statutory Consultees: Newton with Clifton and Freckleton Parish Councils.

## 2.39 Susan Lee (REP1-206)

**Table 2.35: REP1-206 – Susan Lee**

Reference	Written Representation Comment	Applicants' response
REP1-206 1.1	Lack of information re blue light emergency services. They do not appear to have been contacted properly and informed of the potential impact of the proposed development and its effect on the roads in Fylde	<p>The Applicants have assessed the potential impact of the Transmission Assets on emergency services in Volume 3, Chapter 7: Traffic and Transport (APP-108) which considers the Transmission Assets traffic in relation to driver delay, severance, non-motorised user delay, fear and intimidation, road safety and abnormal loads. The assessment concludes (with the application of the mitigation measures described below) that the residual effects upon all road users (including emergency services) would not be significant in Environmental Impact Assessment (EIA) terms which means that further mitigation is not required.</p> <p>The Applicants highlight that extensive commitments have been made to the use of trenchless installation techniques, such as Horizontal Directional Drilling (HDD) to minimise disruption to all A, B and Classified roads (with the exception of Leach Lane) and railways proposed to be crossed by the Transmission Assets (see CoT02, Volume 1, Annex 5.3: Commitments Register (F 1.5.3/F03)). This commitment to the use of trenchless techniques is secured via Requirement 8 (Code of Construction Practice) of Schedules 2A and 2B of the draft DCO (REP1-008). With regard to Leach Lane, the Applicants have committed to maintaining access, with works completed on a 'half / half basis' with traffic to be controlled through the use of temporary traffic management, such as traffic signals. The open cut trenching on Leach Lane is not expected to result in any road closures and vehicular access would always be maintained including for emergency services and for buses. The approach to managing highway crossings is outlined in Section 1.10 of the Outline Construction Traffic Management Plan (OCTMP) (J5/F02). The requirement to produce the detailed CTMP(s) in accordance with the OCTMP in consultation with, and for approval by, the relevant highway authority, is secured by Requirement 9 of Schedules 2A and 2B of the draft DCO (REP1-008).</p> <p>Subject to the grant of the DCO, the Applicants would note that the effects of construction traffic and highway works from Transmission Assets would be managed, monitored and controlled through the development of the detailed CTMPs. In compliance with Requirement 9, the detailed CTMPs would need to be agreed with the</p>

Reference	Written Representation Comment	Applicants' response
		relevant highway authorities. In approving the detailed CTMPs the relevant highway authorities would apply their statutory duties under the Traffic Management Act, 2004 to ensure the "expeditious movement of traffic on the authority's road network" which includes emergency services.

## 2.40 Susan Nebard (REP1-207)

**Table 2.36: REP1-207 – Susan Nebard**

Reference	Written Representation Comment	Applicants' response
REP1-207.01	Instead of the proposed sub-stations and associated cabling route there is a much cheaper, less damaging alternative that can connect to Penwortham via Stanah, using an existing National Grid line, already 400KV capable, with cost savings estimated at £903m at current prices	The Applicants acknowledge that a number of responses have provided comments on site selection and the assessment of alternatives including suggesting that there is an alternative route, and that the Point of Interconnection for the Transmission Assets should be at or via Stanah. The Applicants provided an initial response on site selection and the assessment of alternatives at section 2.31.1 of The Applicants' Response to Relevant Representations Part 1 - Introduction and thematic responses (PDA-005). Following discussions relating to site selection and alternatives at Issue Specific Hearing 1 and in response to a number of the Examining Authority's Hearing Action Points, the Applicants provided a detailed technical response on these matters including explaining why the proposed alternative connection to Stanah is not a viable or feasible alternative route or Point of Interconnection for the Transmission Assets. This was provided at Deadline 1 in Annex 5.2 to the Applicants response to Hearing Action Points: ISH1 6, 8, 9, 19, 26 & 28 - Rev F01 (REP1-039). A summary of the position is provided at section 1.1 above.
REP1-207.02	The alternative would use a designated brownfield site, and create jobs in one of the most deprived areas of	The Applicants refer Ms Nebard to the response at REP1.01 above

Reference	Written Representation Comment	Applicants' response
	Lancashire in future energy intensive, green hydrogen production, yet the applicants state they haven't considered this as they have never been made aware that it is a viable alternative by the National Grid. Whilst it may not have been a viable site at the outset of this project it very much is viable now due to various upgrades that have already taken place. Ignoring this fact and basing planning decisions about now out of date information is not an acceptable answer.	
REP1-207.03	At a time when the country has intense financial challenges, a solution that allows the Government to achieve its green energy aims more quickly and more cheaply is the definition of common sense in action. There are also defence issues with the proposed site if the sub-stations being very close to BAE Systems so again, at a time of heightened tensions across Europe the alternative solution removed this issue.	The Applicants refer Ms Nebard to the response at REP1.01 above.
REP1-207.04	There are also concerns related to extended construction periods and lack of benefits to local communities. Consultation efforts have been insufficient to date leading to stakeholder frustration. Agricultural impacts include prolonged and permanent land loss and disruption. Beach access at St Anne's faces likely closures without mitigation plans. Air safety concerns remain unresolved due to poor engagement with BAE Systems. Emergency access for blue light vehicles during the construction period would create a danger to residents.	<p><u>Construction Periods</u></p> <p>In relation to overall construction periods the Applicants have provided consideration of potential construction scenarios and durations in their Rule 9 - ES assessment of Construction Scenarios (AS-070) at Section 1.5. The Applicants further explained their approach to construction scenarios and coordination between Morgan OWL and Morecambe OWL at Issue Specific Hearing 1 (see in particular paragraphs 11 - 34 of The Applicants' Hearing Summary of Issue Specific Hearing 1 – Day 2 (REP1-035)). Following the hearings, the Applicants have also provided further clarification about out how Morgan OWL and Morecambe OWL will continue to work together post consent to deliver the two projects comprised within the Transmission Assets with a view to minimising impacts on local communities wherever practicable. This is set out in Section 7 of Annex 5.2 to the Applicants response to Hearing Action Points: ISH1 6, 8, 9, 19, 26 &amp; 28 - Rev F01 (REP1-039).</p>

Reference	Written Representation Comment	Applicants' response
		<p><u>Benefits to local communities</u></p> <p>The Applicants addressed concerns relating to local projects benefits at section 2.22 of The Applicants' Response to Relevant Representations Part 1 - Introduction and thematic responses (PDA-005). Following discussion in Issue Specific Hearing 1 in relation to community benefits, and in response to Examining Authority's Hearing Action Point ISH1_31, the Applicants have updated their Statement of Reasons (REP1-012) with information on local community benefits. The Applicants will also be undertaking further engagement on community benefits with local stakeholders as discussed in The Applicants' response to Hearing Action Points due at Deadline 1 - Rev F01 (REP1-037).</p> <p><u>Agricultural Impacts</u></p> <p>The Applicants addressed concerns relating to agricultural land impacts at section 2.3 of The Applicants' Response to Relevant Representations Part 1 - Introduction and thematic responses (PDA-005) which sets out how the Applicants have sought to minimise impacts on agricultural land.</p> <p>Potential impacts on farm holdings and agricultural land were also discussed at Issue Specific Hearing 1 (see paragraphs 65 – 75 of The Applicants' Hearing Summary of Issue Specific Hearing 1 – Day 2 (REP1-035)) and Compulsory Acquisition Hearing 1 (see paragraph 22 of The Applicants' Hearing Summary of Compulsory Acquisition Hearing 1 (REP1-036)) following which the Applicants have responded to a number of Hearing Action Points relating to these matters. Please see ISH1_46, ISH1_47 and CAH1_5 of The Applicants' response to Hearing Action Points due at Deadline 1 (REP1-037).</p> <p><u>Beach Access</u></p> <p>The Applicants previously addressed concerns relating to beach access in section 2.5 of The Applicants' Response to Relevant Representations Part 1 - Introduction and thematic responses (PDA-005). Following the discussions at the Hearings, and in response to Hearing Action Points, the Applicants provided further detailed technical</p>

Reference	Written Representation Comment	Applicants' response
		<p>clarifications in relation to beach access in Annex 5.3 to the Applicants response to Hearing Action Points: ISH1 13, 14, 16, 17 (REP1-040).</p> <p>Further details of the public access to the beach during construction is set out in The Outline Open Space Management Plan which is at Appendix A of the Outline Public Rights of Way (PRoW) Management Plan (AS-048). This sets out the discrete working areas that will be subject to access management during construction works.</p> <p><u>Air safety and Engagement with BAE</u></p> <p>The Applicants acknowledge concerns raised at Issue Specific Hearing 1 relating to air safety linked to bird strike. The Applicants take all safety matters seriously. The Applicants confirmed at Issue Specific Hearing 1 that engagement with BAE and Blackpool Airport is ongoing in order to agree a strategy for a bird strike management plan (see paragraphs 60 - 64 of The Applicants' Hearing Summary of Issue Specific Hearing 1 – Day 2 (REP1-035)). The Applicants also provided responses in relation to this matter at ISH1_40 of The Applicants' response to Hearing Action Points due at Deadline 1 (REP1-037) and provided further detail in relation to engagement with both BAE and Blackpool Airport in the Deadline 1 Cover letter (REP1-001). At deadline 2, the Applicants have submitted the Strategy for Wildlife Hazard Management Plan (S_D2_14) which has been shared with BAE and Blackpool Airport as part of the Applicants ongoing engagement with those bodies as explained in the Applicants' responses to Blackpool Airport and BAE written representations in The Applicants' Responses to Written Representations from Statutory Consultees and other organisations (S_D2_3). The Applicants will continue to actively engage with BAE and Blackpool Airport to resolve concerns in relation to bird strike.</p> <p><u>Emergency Access</u></p> <p>In relation to emergency access for blue light vehicles, the Applicants have assessed the potential impact of the Transmission Assets on emergency services in Volume 3, Chapter 7: Traffic and Transport (APP-108) which considers the Transmission Assets traffic in relation to driver delay, severance, non-motorised user delay, fear and intimidation, road safety and abnormal loads. The assessment concludes (with the application of the mitigation measures described below) that the residual effects upon</p>

Reference	Written Representation Comment	Applicants' response
		<p>all road users (including emergency services) would not be significant in Environmental Impact Assessment (EIA) terms which means that further mitigation is not required.</p> <p>The Applicants highlight that extensive commitments have been made to the use of trenchless installation techniques, such as Horizontal Directional Drilling (HDD) to minimise disruption to all A, B and Classified roads (with the exception of Leach Lane) and railways proposed to be crossed by the Transmission Assets (see CoT02, Volume 1, Annex 5.3: Commitments Register (F 1.5.3/F03)). This commitment to the use of trenchless techniques is secured via Requirement 8 (Code of Construction Practice) of Schedules 2A and 2B of the draft DCO (REP1-008). With regard to Leach Lane, the Applicants have committed to maintaining access, with works completed on a 'half / half basis' with traffic to be controlled through the use of temporary traffic management, such as traffic signals. The open cut trenching on Leach Lane is not expected to result in any road closures and vehicular access would always be maintained including for emergency services and for buses. The approach to managing highway crossings is outlined in Section 1.10 of the Outline Construction Traffic Management Plan (OCTMP) (J5/F02). The requirement to produce the detailed CTMP(s) in accordance with the OCTMP in consultation with, and for approval by, the relevant highway authority, is secured by Requirement 9 of Schedules 2A and 2B of the draft DCO (REP1-008).</p> <p>Subject to the grant of the DCO, the Applicants would note that the effects of construction traffic and highway works from Transmission Assets would be managed, monitored and controlled through the development of the detailed CTMPs. In compliance with Requirement 9, the detailed CTMPs would need to be agreed with the relevant highway authorities. In approving the detailed CTMPs the relevant highway authorities would apply their statutory duties under the Traffic Management Act, 2004 to ensure the "expeditious movement of traffic on the authority's road network" which includes emergency services.</p>
REP1-207.05	The cumulative impacts of substations, cabling, and solar farms lack adequate assessment. Biodiversity concerns persist, with protected bird species inhabiting affected	<p><u>Cumulative Impacts</u></p> <p>The Applicants consider their assessment of cumulative effects is adequate and provided a response to concerns raised in relation to cumulative impacts at section 2.10 of The Applicants' Response to Relevant Representations Part 1 - Introduction</p>

Reference	Written Representation Comment	Applicants' response
	areas. Temporary land use remains unaccounted for in biodiversity net gain(BNG) calculations.	<p>and thematic responses (PDA-005). The Applicants also provided further information in relation to cumulative effects in response to Hearing Action Point ISH1_29 within The Applicants' response to Hearing Action Points due at Deadline 1 (REP1-037) and, as noted in that response, have provided a Review of Cumulative Effects Assessment and In-Combination Assessment at Deadline 2 (S_D2_10).</p> <p><u>Biodiversity</u></p> <p>The Applicants have previously responded to concerns relating to biodiversity matters at section 2.12 of The Applicants' Response to Relevant Representations Part 1 - Introduction and thematic responses (PDA-005). A number of biodiversity matters were discussed at Issue Specific Hearing 1. In response to ISH_39, the Applicants have submitted a note on Site Selection of the Environmental Mitigation and Biodiversity Benefit Areas (S_D2_13) at Deadline 2. The Applicants note that they have also submitted a Strategy for Wildlife Hazard Management Plan (S_D2_14), updated outline Ecological Management Plan (J6/F02) and an updated Biodiversity Benefit Statement (J11/F03) at Deadline 2 which seek to address various concerns raised in relation to biodiversity including birds</p> <p><u>Biodiversity Net Gain and Temporary Land Use</u></p> <p>The Applicants confirmed at Issue Specific Hearing 1 that there is no legal requirement for the Transmission Assets to provide BNG and as such, it is being provided on a voluntary basis. (See paragraph 86 of The Applicants' Hearing Summary of Issue Specific Hearing 1 – Day 2 (REP1-035).) The Applicants Onshore Biodiversity Benefit Statement (J11/F03) explains the approach taken by the Applicants and confirms that the calculation undertaken for biodiversity benefit utilises the latest Defra Biodiversity Metric (version 4.1) in line with guidance and NPS EN-1.</p>
REP1-207.06	All of these issues are worsened by the refusal of the applicants to consider any alignment of their works leading to a potential 10 year period of disruption. Ultimately, the alternative route offers a more direct, cheaper, and	<p>The Applicants explained their approach to construction scenarios and coordination between Morgan OWL and Morecambe OWL at Issue Specific Hearing 1 (see in particular paragraphs 11 - 34 of The Applicants' Hearing Summary of Issue Specific Hearing 1 – Day 2 (REP1-035)). Following the hearings, the Applicants provided a detailed technical response to these points within Annex 5.2 to the Applicants response to Hearing Action Points: ISH1 6, 8, 9, 19, 26 &amp; 28 - Rev F01 (REP1-039).</p>

Reference	Written Representation Comment	Applicants' response
	environmentally viable solution that has been ignored by applicants.	<p>Section 7 of REP1-039 sets out how Morgan OWL and Morecambe OWL will continue to work together post consent to deliver the two projects comprised within the Transmission Assets. Section 8 of REP1-039 clearly explains why flexibility must be retained within the draft DCO (REP1-008) to allow for the projects to be constructed in different ways and why Morgan OWL and Morecambe OWL cannot commit to concurrent construction within the draft DCO.</p> <p>The Applicants also refer Ms Nebard to the response at REP1.01 above in relation to the suggested alternative route.</p>

## 2.41 Trevor Bethell (REP1-214 and REP1-215)

**Table 2.37: REP1-214 – Trevor Bethell**

Reference	Written Representation Comment	Applicants' response
REP1-214.01	Adding low carbon generation to the existing network is justified where it is appropriate and of benefit to the public interest and the economy. However, the result of our existing generation mix is to deliver some of the highest electricity prices to industrial, commercial and residential consumers in the developed world. Although the reasons for this are complex the renewables industry relies largely on subsidies in some manner to provide any commercial viability and the approval of any new projects should not be given simply because it meets some existing or historic political aspirations.	The Applicants note this response.

Reference	Written Representation Comment	Applicants' response
REP1-214.02	At the recent hearings held by the Examination Authority in Blackpool the Applicant's representatives used the expressions "climate emergency" and "urgent need for connection". For every expert who states an opinion that there is a "climate emergency" another could be produced to say there is not. There is no universal consensus on this matter. We can agree that the climate may be changing, and that some of this is a natural phenomenon and that some is the inevitable result of greenhouse gas emissions. Either way the United Kingdom plays a very small role in its effects on global climate change. Therefore, new electricity generation projects should be considered only on their specific merits and their impact on the existing environment, in this case both on and offshore, and of their impact on the local communities, businesses and industry affected by their proposals.	<p>The Applicants note this response.</p> <p>The National Policy Statements (NPSs) establish the policy need for new renewable energy generation. NPS EN-3 identifies new offshore wind projects as a critical national priority infrastructure, for which there is an urgent need. The policy and legislative support for the scheme is set out in full in the Planning Statement (REP1-032) and was also explained at Issue Specific Hearing 1 (see REP1-034) and Compulsory Acquisition Hearing 1 (see REP1-036).</p> <p>The Applicants have considered potential impacts associated with the construction, operation and maintenance and decommissioning phases of the Transmission Assets as part of the project development and have assessed each topic in the Environmental Statement. Different receptors have been selected depending on the environmental topic and potential impact and appropriate mitigation has been identified and secured through the draft DCO (REP1-008). The Applicants are committed to developing the Project in a way that is sensitive to the local community and the environment, minimising effects wherever possible.</p>
REP1-214.03	And neither should they be approved simply because they comply with a political intent regardless of whatever historic national policy statements exist. In response to the drive to "Net Zero" no lesser figure than Sir Tony Blair, whose significance in the Labour Party needs hardly to be addressed, has stated words to the effect that politicians cannot pursue these climate objectives without taking the electorate with them. In other words, there are political consequences to blindly continuing with a climate policy if this alienates the electorate. Recent election results have shown how public opinion can rapidly change and there is no evidence to support that there is widespread consent amongst the general public to the "net zero" agenda. In a poll of 26,000 readers recently carried out by the Daily Telegraph 95% of respondents wanted the Net Zero target to be scrapped. And the Danish renewables company	<p>The Applicants note this response. The Applicants have set out in the Planning Statement (REP1-032) and at Issue Specific Hearing 1 (see REP1-034) and Compulsory Acquisition Hearing 1 (see REP1-036) the legal and policy framework for making a decision on the Transmission Assets application. The Planning Statement (REP1-032) also clearly sets out how the Application meets the relevant legal and policy tests.</p>

Reference	Written Representation Comment	Applicants' response
	Orsted has recently withdrawn investment from the Hornsea 4 Windfarm due, it is understood, to the commercial viability of this project given rising installation costs. So emotive statements such as “climate emergency” and “urgent need to connect” are opinions not facts and should not be given any weight in the ongoing consideration of this very large, highly complex and massively intrusive application.	
REP1-214.04	The lack of demonstrable public support also weakens the “public interest” defence particularly when this is used to defend the intrusion on Human Rights established under the Human Rights Act 1998 and the European Convention on Human Rights, particularly Article 8 “Right to Respect for Private and Family life”. In paragraph 2.25.2.10 of Document S_PD_3.1 11th April 2025 F01 (EXA Library Reference: PDA-005) the Applicant states: “The need for the Transmission Assets is set out in the Planning Statement (REP1-032) and is summarised in section 1.4 of the Statement of Reasons (AS-009). This demonstrates that the development is within the public interest given the significant benefits Morgan Offshore Wind Project and Morecambe Offshore Windfarm will bring”.	The Applicants note this response and the concerns raised by Mr Bethell in relation to human rights and compliance with the Human Rights Act 1998 and the European Convention on Human Rights. The Applicants maintain that the proposals are compliant for the reasons set out in section 1.11 of the Statement of Reasons (AS-009).
REP1-214.05	As argued above I do not believe that the Public Interest defence can now be relied upon as the tide of public opinion has turned regarding the implications of the “Net Zero” crusade. The content of policy documents relied upon, whilst they may still be in place, represent political thinking having taken place on an historic basis and is not now necessarily reflective of current attitudes which are more likely to be concerned with the rising cost of energy and the loss of agricultural land and habitat to these heavily subsidised “Clean Energy” projects.	The Applicants refer Mr Bethell to the response at REP1-214.04 above.

Reference	Written Representation Comment	Applicants' response
REP1-214.06	The Council of Europe Toolkit to the ECHR states in respect of "Private Life" that the interpretation is expansive and goes beyond the ordinary meaning under many national systems. "Private Life" is a wide concept under the Convention and goes much further than privacy and covers amongst other things "...freedom from noise or toxic emissions". Similarly "Home" can include both residential and business premises and "The right protects the peaceful enjoyment of living in the Home, free from unauthorised entry and also from nuisances like noise and other pollution". As stated above the definition of "Home" includes both residential properties and commercial businesses. It can also be argued that the term "nuisances" can go beyond "noise and other pollution" which are arguably indicative examples only.	The Applicants refer Mr Bethell to the response at REP1-214.04 above.
REP1-214.07	The only legitimate interference with this Right under Paragraph 2 of Article 8 which could apply is "the economic well being of the country" and this must be demonstrated to be "necessary in democratic society to fulfil that aim i.e. not excessive, arbitrary or unfair".	The Applicants refer Mr Bethell to the response at REP1-214.04 above.
REP1-214.08	This highly intrusive, complex and very large civil engineering project will cause detriment to local residents and businesses and interfere with their rights under Article 8 of the ECHR. The case for this project as regards "the economic well being of the country" is no longer compelling nor "necessary". The protracted timescales for development, irrespective of the lack of commitment by either Applicant to pursue a concurrent build, and the inevitable disturbance to local residents, businesses, vulnerable persons, the local economy, local agriculture and both flora and fauna are not "necessary in a democratic society" and are "excessive....and unfair".	The Applicants refer Mr Bethell to the response at REP1-214.02, REP1-214.03 and REP1-214.04 above.

Reference	Written Representation Comment	Applicants' response
	This application for a Development Consent Order should therefore be denied	
REP1-214.09	<p>The Landfall Works</p> <p>1. Summary</p> <p>This representation looks at the impact of the proposed Landfall Works as defined in the Applicants documents. It considers the proposed methods of installing the lengthy conduits (steel pipes) underground through highly sensitive areas and whether these are realistically achievable. It enquires as to what alternative methods are proposed if implementation using underground drilling/boring techniques fails.</p> <p>It raises concerns over the impacts of noise, vibration and structural damage to adjoining and nearby residential and commercial properties.</p> <p>It refers to the statements made during the recent hearings held in Blackpool that although this is a joint application neither party will commit to a concurrent construction neither will they commit to consecutive works thus extending the proposed timeframe for these disruptive intrusions over an indefinite time frame.</p> <p>It argues that the information presented to the General Public has been unclear and the scale of the proposed works and the impact of the heavy equipment required both on and offshore is buried in one of the numerous technical documents submitted in the Application and the effects on local residents, businesses and the local economy have not been made clear in an open, transparent and accessible manner. The technical and practical challenges of pulling off shore cables a distance</p>	The Applicants note this response.

Reference	Written Representation Comment	Applicants' response
	<p>of 7,000 metres (this distance is as stated in the Applicant's supporting documentation) through up to six separate lengthy underground steel pipes should not be underestimated and the risks fully understood by all affected parties.</p> <p>Finally, in respect of the many issues raised in this and other submissions and representations, it asks the Examining Authority to decline this Application for a joint Development Consent Order in respect of both Applicants.</p>	
REP1-214.10	<p>2. Submission</p> <p>This representation concerns the proposed landfall works, that is the entirety of the works to be carried out from the proposed Transmission Joint Bays (TJBs) situated within the curtilage of Blackpool Airport to the point at which the offshore cables reach the beach at the Mean Low Water Springs point. As there are potentially six offshore cables to be installed and pulled through to the TJBs, this means there will be up to six beach "landing points" for the offshore cables which will be separated by, it is understood, a 20 metre distance between each.</p> <p>From the TJBs the Applicants propose to use a continuous trenchless digging method to install steel pipes underground for each of the proposed six offshore cables from Blackpool Airport, under the Golf Course, under the Railway Line, under the Nature Conservancy Site, under Clifton Drive North and under the Sand Dunes until the pipe exit points on the beach which are understood to be situated 100 metres from the toe of the Sand Dunes (the point at which the Dunes meet the beach on the seaward side). There will be up to six of these steel pipe exit points on the beach and separated across the beach by</p>	<p>The Applicants note this response, and highlights that a detailed summary of works at landfall, including indicative plans, has been provided at Deadline 1 Please refer to S_D1_5.3 Annex 5.3 to the Applicants response to Hearing Action Points: ISH1 13, 14, 16, 17 (REP1-040).</p>

Reference	Written Representation Comment	Applicants' response
	distances understood to be no less than 20 metres between each exit point.	
REP1-214.11	<p>Although indicative cable corridor routes have been identified from the TJBs to the beach the Applicants have not, to my knowledge, given any specific information regarding the length of the proposed underground direct drilling routes of which there will be up to six. It should be perfectly possible at this stage for the Applicants to indicate what the minimum and maximum distances could be from the TJBs to the Pipe Exit Points on the Beach without committing to using either or both of the proposed cable corridors. They would be indicative figures only.</p> <p>This specific information on the length of the proposed drilling/boring work would provide the Examining Authority (EXA) and the general public with a greater appreciation of the scale of these proposed civil engineering works. At the recent examination hearings held in Blackpool one of the Applicant's representatives is understood to have said that these proposed underground drilling works would be "challenging". When I hear the word challenging this suggests to me that it may not be possible to succeed with these proposed underground trenchless methods in which case what is their alternative? Open cut trenching across the Nature Conservancy Site and the Sand Dunes would be completely unacceptable in any circumstances. The project is therefore committed to drilling considerable distances underground in order to achieve their objectives without seeming to specify what they would do if this proved impossible in part or in full.</p>	<p>The Applicants acknowledge the request for further clarity regarding the scale and feasibility of the trenchless installation works at landfall. A detailed summary of works at landfall, including indicative plans and construction descriptions, has been provided in S_D1_5.3 Applicants response to Hearing Action Points: ISH1 13, 14, 16, 17 (REP1-040), submitted at Deadline 1. This document details the scale and nature of surface works on the Lytham St Annes beach. As detailed within Table 3.13 of the Project Description (F1.3/F03), the maximum length of the direct pipe per circuit, from entry pit within Blackpool Airport to exit pit located at the beach, has been defined as 1500m.</p> <p>As secured within the draft DCO (Schedule 2A and 2B, Requirement 8: Code of Construction Practice), the installation of the offshore export cables between the beach and the TJBs within Blackpool Airport will be undertaken entirely using trenchless techniques. This ensures that all works between the exit pit on the beach and the TJBs will occur entirely underground, thereby avoiding disturbance to sensitive features such as the Lytham St Annes Dunes SSSI and the St Annes Old Links Golf Course. No open trenching will be permitted through these areas, and no surface works are proposed within the SSSI or the golf course.</p> <p>The Applicants note that trenchless installation across this distance is an established engineering solution and has been successfully used across Offshore Wind Projects within the UK. While trenchless installation works can present "challenges", detailed ground investigation surveys that will be conducted post consent to inform detail engineering design. These surveys will ensure the feasibility and effective installation of the offshore export cable circuits.</p>

Reference	Written Representation Comment	Applicants' response
REP1-214.12	<p>My understanding is that although the Horizontal Directional Drilling (HDD) method can in theory be used for longer distances the process involves an initial underground drill followed by successive back reaming i.e. more the one pass would be required. It carries the risk of bore hole collapse before the pipe conduit is pulled through and the underlying nature of this soft unstable coastal ground presents its own challenges.</p> <p>The Direct Pipe method involves the boring head to be attached to the pipe conduit so in theory the boring and conduit pipe installation are continuous. However, it is understood that the distances that can be drilled using this method are shorter than those achievable by the HDD method which is why I believe the Applicants should, at this early stage of Examination, produce figures for the proposed minimum and maximum lengths of the proposed underground drilling routes (of which there will be up to six) so that the feasibility of employing either of the above two methods can be properly assessed and the Applicants required to show what they would do if either method failed.</p>	<p>The Applicants acknowledge the request for further clarity regarding the scale and feasibility of the trenchless installation works at landfall. The Applicants have provided a response to this matter in REP1-214.11</p>
REP1-214.13	<p>The Applicants state in their Application "The Applicants do not consider it is necessary to include additional drafting in the draft Development Consent Order (DCO) (REP1-008) providing for a landfall construction method statement concerning the Work Nos. noted as the details of the construction methods are set out in Volume 1, Chapter 3: Project description (F1.3/F03). Adherence to the scope of works set out in that chapter is secured through the</p>	<p>The Applicants acknowledge the request for further clarity regarding the scale and feasibility of the trenchless installation works at landfall. The Applicants have provided a response to this matter in REP1-214.11</p>

Reference	Written Representation Comment	Applicants' response
	<p>wording in the DCO that requires the project to be in accordance with the environmental statement".</p> <p>For a civil engineering project of this scale, involving the laying of up to six Extra High Voltage cables (understood to be operating at voltages between 66,000 and 110,000 volts - these figures are taken from the separate Offshore Windfarms Development Consent Order Application) through sensitive coastal landscapes the EXA and the General Public should be presented with specific detailed accessible and easily absorbed information regarding these proposed Landfall Works so that the scale and achievability of these proposed works can be properly assessed. The Examination Authority should be entirely satisfied that the proposed engineering solution is practical and can be delivered irrespective of any other further comments that are made regarding noise, vibration and compensation in the event of structural damage to nearby properties</p>	
REP1-214.14	<p>According to the Outline Offshore Cable Specification and Installation Plan Document Reference J15 (EXA Reference APP-220) in Paragraph 2.2.1.2 it appears that only one off shore cable pull in is allowed during the winter months between November and February inclusive which suggests an elapsed period of up to 6 years if the off shore cable "pull-ins" are consecutive. In other words either all of the onshore drilling/boring works from the TJBS to the Pipe Exit Points on the Beach take place at the same time and the protective Cofferdams remain in place for years until the cable "pull-ins" are completed or, for each successive year, another drilling/boring exercise takes place to install another pipe cable conduit for next offshore cable to be</p>	<p>Based on feedback from stakeholders, the Applicants have made a commitment (CoT129 of Volume 1, Annex 5.3: Commitments Register (F1.5.3/F03) submitted at Deadline 2) 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) submitted at Deadline 2.</p> <p>With regard to concerns about the potential use of cofferdams on the beach, further details regarding installation methods, indicative graphical representations, and the temporary nature of the cofferdams are provided in document S_D1_5.3 Applicants response to Hearing Action Points: ISH1 13, 14, 16, 17 (REP1-040), submitted at Deadline 1.</p>

Reference	Written Representation Comment	Applicants' response
	<p>pulled through. And this uses the assumption that the two projects are consecutive without any time gaps between them. If one starts years after the first the inevitable disruption seems to be endless.</p> <p>The above suggests that the Cofferdams will be required to be in place for some time and it is difficult to see how they can be both erected and secured for the purposes of health and safety and general security without fencing off large areas and thus severely restricting access on the beach for the general public and amenity users. The Cofferdams themselves are stated to have an area of 15 meters by 5 meters (75m<sup>2</sup>) in one of the Applicants documents (the reference to which is not immediately to hand). These Cofferdams will presumably be constructed using pile driven steel sheeting and their height will need to take account of the tidal range in this area e.g for Monday 12th May 2025 low tide at 05.58 hours of 1.6 metres and a high tide of 8.2 metres at 11.44 hours, as forecast at Blackpool. There are no graphical representations of these coffer dams which would be helpful and also no illustrations to show their impact on the beach landscape especially if they are to be there for some time.</p>	
REP1-214.15	<p>The applicants should produce a focused piece of work going into greater detail concerning the proposed landfill works and their interaction with the offshore cable laying as the two are clearly linked. The proposed boring/drilling works need to be completed for each offshore cable before it would be possible for these to be pulled through the underground pipe conduits. At the point where each pipe exit point emerges on the beach these will presumably need to be protected by the proposed Cofferdams until the cable pulling works are completed. Therefore any</p>	<p>The Applicants acknowledge the request for further clarity regarding the potential use of cofferdams on the beach. Further details regarding installation methods, indicative graphical representations, and the temporary nature of the cofferdams are provided in document S_D1_5.3 Applicants response to Hearing Action Points: ISH1 13, 14, 16, 17 (REP1-040), submitted at Deadline 1.</p>

Reference	Written Representation Comment	Applicants' response
	protective fencing for safety and security will be in place until the cable laying and pulling works for each cable are completed. Paragraphs 2.2.1.1 and 2.2.1.3 to 2.2.1.4 of APP-220 go on to give more details of the constraints faced and the offshore vessels that may be required to be in place to achieve the cable pull ins which are stated to be up to 7,000 metres to the Transmission Joint Bays. This should give some idea of the scale of heavy equipment that is likely to be required to achieve these objectives and I believe that this will inevitably have impacts on beach and offshore access for amenity users and these impacts will be in place for some time despite the Applicants assurances to the contrary.	
REP1-214.16	Further to the above, buried away in the Applicants numerous supporting documents, and I say this because the detail concerning the landfall work is extremely hard for the general public to find let alone appreciate the impacts it will have, is Section 3.14 of Volume 1 Chapter 3 of the Environmental Statement Document Reference F1.3 (EXA Reference: APP-024) . This section of the document does in fact provide further information on the Landfall works and also includes images of the types of heavy duty equipment that will be required to carry out the drilling/boring activities and the cable pull ins. It can be seen that these are significant and I would suggest that the general public have no idea of the scale of these Landfall Works because they have never been presented to them in a format or manner which could be easily absorbed and considered. One way to have done this would have been through an open and transparent exhibition or focussed public meetings concentrating solely on the Landfall works which, with due respect to others affected, are likely to impact the greatest concentration of residents and visitors in one area. This has not happened so I believe the	The Applicants acknowledge the request for further clarity regarding the scale and feasibility of the trenchless installation works at landfall. The Applicants have provided a response to this matter in REP1-214.11

Reference	Written Representation Comment	Applicants' response
	general public are largely unaware of the scale of what is proposed whatever the Applicants representations regarding the Consultation activities say.	
REP1-214.17	The impact of the construction elements of this Application should also be considered in relation to the proposed work to replace the existing sea wall defences at the St Annes on Sea "Island" site which are scheduled to take place between 2023 and 2025. These will have a massive effect on access to the beach in this area whilst these major civil engineering works take place and may in themselves affect tourism and the local economy as well as the amenity value of both the beach and adjacent promenade. Coupling the works with the proposals from the Applicants can only result in detriment to the attractiveness of St Annes as a tourist destination as well as the increased impacts on local residents.	The Applicants can confirm that the earliest anticipated commencement of construction of the Transmission Assets is 2026 and therefore there will be no temporal overlap between the Transmission Assets and the proposed work to replace the existing sea wall defences at the St Annes on Sea "Island" site.
	<p><b>The Applicants state in their application documents</b></p> <p>"The nearest care home is approximately 35m from the Transmission Assets Order Limits (i.e.the closest point to the care home at which the offshore export cables could be installed). However, at this location at landfall where the Applicants have made a commitment (CoT44 of Volume 1, Annex 5.3: Commitments Register of the ES (F 1.5.3/F03)) that the installation of the offshore export cables under Lytham St. Annes Dunes SSSI and the St. Anne's Old Links Golf Course will be undertaken y trenchless installation technique. This is secured by Requirement 8b within Schedules 2A and 2B of the draft Development Consent Order REP1-008). Section 8.11.2, of Volume 3, Chapter 8: Noise and Vibration ((APP-117) has assessed the potential impacts of construction of the Transmission Assets on the care home and concluded that with appropriate mitigation secured through the DCO, the</p>	<p>The Applicants acknowledge that use of trenchless techniques, in this case use of the HDD and Direct Pipe methods, result in both noise and vibration impacts.</p> <p>An impact on a receptor is defined as "<i>a change that is caused by an action/proposed development</i>", as noted in the Glossary of ES Volume 3, Chapter 8: Noise and Vibration (APP-117).</p> <p>For construction noise, the Applicant confirms that the level at which adverse impacts are likely to occur is the existing ambient noise level experienced at a residential property, this being the Lowest Observed Adverse Effect Level (LOAEL). Should a construction activity result in a construction noise level equal to the existing ambient noise level, then a 3 dB increase in ambient noise level at the property will result. Such an increase is generally accepted to be the lowest perceptible to the human ear and hence considered likely to result in an adverse impact. When construction noise levels are predicted to be below the LOAEL, adverse impacts are considered unlikely to occur, with the resulting impact level being identified as 'negligible'.</p> <p>However, the effect on a receptor does not consider this impact alone, with the effect defined as "<i>the term used to express the consequence of an impact, taking account of</i></p>

Reference	Written Representation Comment	Applicants' response
	<p>potential effects would be minor adverse, which is not significant in Environmental Impact Assessment (EIA) terms".</p> <p>I do not agree that their conclusion is accurate and believe it should be challenged. Given the scale of works proposed it is impossible to believe that the effects on noise and vibration will be "minor adverse". Every reference I have seen online to HDD or Direct Pipe methods states words to the effect that noise and vibration are inevitable and the effects of . the unstable geology of the Fylde Coast are speculative.</p>	<p><i>its magnitude, with the importance, or sensitivity, of the resource or resource with which it is associated"</i> .</p> <p>The construction noise assessment reported in APP-117 predicted a 'negligible' to 'high' impacts due to trenchless techniques at receptors located along the offshore export cable corridor and 400 kV cable corridor. However, the assessment concluded that, when considering both the sensitivity of receptors and the duration of impacts, the effects ranged from 'negligible' to 'minor adverse', which are not significant in EIA terms.</p> <p>In regard to Century Care Home, the construction noise impact from these works was predicted to be 'negligible' with overall effect on the receptor concluded to be 'minor adverse'.</p> <p>This conclusion is based on the low noise levels predicted at Century Care Home as a result of trenchless techniques and their sensitivity, which is defined as 'high' during the daytime period, and 'very high' during the night-time (as stated within Table 8.15 of APP-117). The low noise levels predicted at Century Care Home are a result of their distance to the entry pit for the trenchless technique, being somewhat 800m away. Due to the very nature of trenchless techniques, Century Care Home will not be in close proximity to any plant associated with these works.</p> <p>Furthermore, mitigation measures, such as installing local noise screening, using plant with fitted noise insulation and shutting down equipment when not in use, have been identified in the Construction Noise and Vibration Management Plan(s), which will be developed from the Outline Construction Noise and Vibration Management Plan (APP-196) and which forms part of the Outline Code of Construction Practice (OCoCP). The detailed CoCP(s) are secured by Requirement 8 of Schedules 2A and 2B of the draft DCO (REP1-008). Detailed Construction Noise and Vibration Management Plan(s) will be implemented by the Applicants as approved by the relevant local planning authorities in consultation with the relevant statutory stakeholders, as appropriate. Through the implementation of such mitigation measures, noise and vibration will be suitably controlled to minimise adverse impacts and effects.</p> <p>The construction vibration assessment reported in APP-117 identified impacts associated with primary sources of construction vibration, which included vibratory piling associated with HDD entry and exit pits. However, adverse construction vibration</p>

Reference	Written Representation Comment	Applicants' response
		impacts and effects were not identified at Century Care Home, due to this receptor being outside the maximum 100m distance at which these impacts are likely to occur. It is therefore concluded the overall construction noise and vibration effects at Century Care Home reported in APP-117 is appropriate.
REP1-214.18	<p>In the recent hearings held in Blackpool it seems that issues regarding noise &amp; vibration were dismissed as having little or no impact by applicant's lead counsel. I do not believe these issues can be so summarily dismissed and need much greater investigation as the EXA process continues. The Century Care Home also provides nursing care so it is more than likely that their some residents may, in view of age and health, be particularly fragile and I cannot see how large scale civil engineering works effectively on their doorstep will in any way not have a demonstrable impact on their health and well being.</p> <p>There also seems to be little consideration for the residents of the adjacent Dunepoint Apartments whose properties are directly next to one of the proposed cable corridors.</p>	<p>The Applicants acknowledge noise and vibration resulting from the construction, operation and decommissioning of the Projects may lead to adverse impacts and effects including at Century Care Home, as reported in APP-117 and indicated in the Applicants response to REP1-214.17 above. However, with the implementation of mitigation measures to be detailed within the Construction Noise and Vibration Management Plan(s) for the Projects, noise and vibration will be suitably controlled to minimise adverse impacts and effects, which is secured by Requirement 8 of the draft DCO (REP1-008) as set out above.</p> <p>In regard to Dunepoint Apartments, the Applicants confirm that this location has been considered within APP-117 and Volume 3, Annex 8.2: Construction Noise and Vibration (APP-119), identified as 'Dunepoint'. Construction noise impacts at this location were predicted to be 'negligible', with the overall effect 'negligible' to 'minor adverse', which is not significant in EIA terms.</p>
REP1-214.19	<p>At the recent hearings I understood the Applicants to have stated that they will have no liability for any structural damage outside of the Development Consent Order boundary. Perhaps I understood this wrongly but given the nature of the proposed trenchless drilling/boring methods surely full responsibility for any structural damage to nearby properties must be assumed by the Applicants? The Mining Remediation Authority (formerly the Coal Authority) state on their website "We (the Coal Authority) or statutory Licensees have a legal duty to take remedial action if a property is affected by subsidence damage caused by coal mining operations." Given that in the</p>	<p>The Applicants note concerns regarding the use of Horizontal Directional Drills (HDD) (and other trenchless installation techniques) as a method of installing export cables along the landfall and onshore export cable corridor route. Trenchless installation techniques, such as HDD, are widely proven and extensively used for the installation of export cables without disturbing the surface environment and existing subsurface infrastructure.</p> <p>The design of the cable crossings utilising trenchless techniques will be undertaken at the detailed design stage, post consent. This will be informed by site specific information, including ground condition surveys, where required, to ensure that cable installations are appropriately designed. The detailed design will reflect the complexity of the crossing method and the entry and exit pit locations and the depth of the</p>

Reference	Written Representation Comment	Applicants' response
	majority of cases this is likely to result from historic tunnelling work I do not see why comparisons cannot be drawn with these proposed invasive methods and the Applicants made responsible for any structural damage which occurs through their Landfall works.	crossing. Therefore, trenchless technique installations will be designed at sufficient depths to prevent interaction with existing infrastructure.  Where evidenced losses as a direct result of the Project cannot be mitigated, compensation is available in accordance with the Compensation Code. The UK Government has also produced a series of plain English general guides to compulsory purchase and compensation which you may find useful: Compulsory purchase and compensation – www.gov.uk Guide books 1 and 4 being the most appropriate.
REP1-214.20	The Applicants have produced an Online Bentonite Breakout Plan Document Reference J1.13 (EXA Reference APP-xxx) and in Paragraph 1.5.1.1 describe a description of Bentonite and the additional additives which may be used. They cannot rule out the lubricating fluid breaking out of the bore and although they propose breakout response methods in Section 1.10 of this document I am concerned at the risk of pollution and contamination in this sensitive marine and coastal environment.	The Outline Bentonite Breakout Plan (APP-206) provides details of measures that would be utilised if a bentonite breakout was to occur during trenchless installation.  The Applicants have made a commitment (CoT77 of Volume 1, Annex 5.3: Commitments Register of the ES (F 1.5.3/F03)) to prepare detailed Bentonite Breakout Plan(s) This is secured by Requirement 8 within Schedules 2A & 2B of the draft Development Consent Order (REP1-008). Detailed Bentonite Breakout Plan(s) will be implemented by the Applicants as approved by the relevant local planning authorities.
REP1-214.21	Finally with regard to this joint application for a DCO. It seems to me that the Applicants are trying to have it both ways. On the one hand they argue that this joint application avoids the need for two radial connections despite both grid connections being proposed at NGC's preferred connection point at Pentwortham and therefore, by default, implying a joint cable corridor whichever cable route were to be chosen.  On the other hand they state quite clearly that these are two completely separate very large, complex and highly intrusive civil engineering projects to install onshore Transmission Assets that are financed, installed, owned and operated by two completely separate consortia of Companies who have no commercial interdependence and	The Applicants explained their approach to construction scenarios and coordination between Morgan OWL and Morecambe OWL at Issue Specific Hearing 1 (see in particular paragraphs 11 - 34 of The Applicants' Hearing Summary of Issue Specific Hearing 1 – Day 2 (REP1-035)). Following the hearings, the Applicants provided a detailed technical response to these points within Annex 5.2 to the Applicants response to Hearing Action Points: ISH1 6, 8, 9, 19, 26 & 28 - Rev F01 (REP1-039). Section 7 of REP1-039 sets out how Morgan OWL and Morecambe OWL will continue to work together post consent to deliver the two projects comprised within the Transmission Assets. Section 8 of REP1-039 clearly explains why flexibility must be retained within the draft DCO (REP1-008) to allow for the projects to be constructed in different ways and why Morgan OWL and Morecambe OWL cannot commit to concurrent construction within the draft DCO.

Reference	Written Representation Comment	Applicants' response
	both of whom cannot and will not commit to any concurrent construction works thereby raising legitimate fears that if consecutive these proposed works could drag on for years.	
REP1-214.22	There is no benefit to the well being of the local community or the coastal environment or economy from these very large, complex and highly intrusive civil engineering works arising from this joint application for a Development Consent Order should therefore be refused by the Examining Authority.	The Applicants addressed concerns relating to local projects benefits at section 2.22 of The Applicants' Response to Relevant Representations Part 1 - Introduction and thematic responses (PDA-005). Following discussion in Issue Specific Hearing 1 in relation to community benefits, and in response to Examining Authority's Hearing Action Point ISH1_31, the Applicants have updated their Statement of Reasons with information on local community benefits. The Applicants will also be undertaking further engagement on community benefits with local stakeholders as discussed in The Applicants' response to Hearing Action Points due at Deadline 1 - Rev F01 (REP1-037).
REP1-215.01	<p>EXA PDA-005</p> <p>In the above document the Applicants respond to the 2157 representations made by the General Public. The fact that this number of responses from the public were made is a demonstration of the strength of feeling this Application has generated in the local community.</p> <p>The Applicant argues that because of the number of responses it is unable to address each one individually and, for their convenience, instead have opted for generic replies.</p> <p>In paragraph 1.2.1.3 they state "The Applicants recognise that there are specific matters raised by Statutory Parties (Local Authorities, Agencies, People with Interest in Land etc.) and these have been addressed in The Applicants' Response to Relevant Representations Part 2- Affected parties and statutory consultees' (document reference S_PD_3.2) and its supporting annexes"</p>	<p>The Applicants acknowledge Mr Bethell's concerns on their approach to responding to Relevant Representations. The Applicants opted for this approach to avoid extensive repetitions throughout the response document and to make it easier for the members of the public, the Examination Authority and other Interested Parties to understand how the Applicants have responded to common concerns.</p> <p>The Applicants would like to highlight that the AI tool Harvey was used to identify the list of issues in a quantitative manner and then carry out numerical calculations, it was not used in the preparation of the Applicants' responses to issues raised. The Applicants would like to confirm that they have read every one of the received public relevant representations and identified re-occurring themes manually before using the AI tool to confirm the list of issues. The Applicants would note that this approach is preceded in recent examinations for Development Consent Orders (DCOs) which received a high number of public relevant representations. This includes the DCO applications for Byers Gill Solar, which is at decision stage, and Sunnica Energy Farm, which was granted consent in July 2024.</p>

Reference	Written Representation Comment	Applicants' response
	<p>They then go on to describe in paragraphs 1.4.1.1 to 1.4.1.6 that the volume of responses from the General Public have been too great for their resources to deal with individually. Instead they suggest that these responses were analysed, possibly by a third party, “.....the professional judgement of the communications team advising the Applicants who have reviewed all of the Relevant Representations”. They go on to say that an AI tool was used to identify generic issues and quantify the number of responses which included these generic points. Having identified 31 generic categories only 25% of the 2157 representations from the General Public were then used by the AI tool to identify the number of representations made in each category. Meanwhile the responses to the Statutory Bodies and other consultees have receive full individual and specific responses to the representations they made.</p> <p>Resourcing of this project is a matter for the Applicants and their representatives. It should not result in what could be perceived as a discriminatory approach to the representations made by the General Public. Many of these respondents would have spent some considerable time in reviewing the numerous detailed and in some cases highly technical documents the Applicants have produced so far. Where the representations from members of the general public were less detailed, and perhaps amounting to a single paragraph or less, I could understand grouping them collectively for the purposes of identifying generic themes. But members of the public who have spent time and energy constructing detailed arguments at length to support their representations only to find these diluted by generic analysis is both disrespectful and inadequate as a means of addressing their concerns.</p>	

Reference	Written Representation Comment	Applicants' response
REP1-215.02	I wish to register my objections to the way in which the Applicants have chosen to deal with the 2157 representations from the General Public many of which are completely opposed to or have significant concerns regarding the impact of this very large, complex and highly intrusive civil engineering project. Where a substantive representation has been made by a member of the General Public this should have received an individual response to the specific points and issues that were made. I would request the Examining Authority consider carefully whether the Applicant's approach has been reasonable especially as the Examination is only just beginning and there will be many more opportunities during the process for the General Public to make further representations. It is to be hoped that, irrespective of the approach taken by the Applicants in their method of dealing with General Public responses, in respect of these 2157 respondents the Examining Authority will have read each of their submissions and will take these into account when making the final decision and recommendation.	Please see the Applicants' response to REP1-215.01 above.

## 2.42 Carol Thomas (REP1-218)

**Table 2.38: REP1-218 – Carol Thomas**

Reference	Written Representation Comment	Applicants' response
REP1-218 1.1	To proceed with the wind farming plan is very perplexing for all the communities that would be affected. Not to	The Applicants note this comment and acknowledge Ms Thomas' concerns.

Reference	Written Representation Comment	Applicants' response
	mention the, schools, Farmers, wildlife, and the environment.	<p>The Applicants previously provided information and responses in relation to these concerns, amongst others, in The Applicants' Response to Relevant Representations Part 1 - Introduction and thematic responses (PDA-005). For example, matters raised in relation to impacts on wildlife are set out in section 2.12 of that document, impacts on agricultural land and farm holdings at section 2.3, impacts on local communities including schools at section 2.8 and the local economy (including consideration of disruption to local communities and businesses) at section 2.21. The Applicants also note that further clarifications in relation to a number of matters have been provided in response to Hearing Action Points at Deadline 1 including:</p> <ul style="list-style-type: none"> <li>- ISH1_46, ISH1_47 and CAH1_5 of The Applicants' response to Hearing Action Points due at Deadline 1 (REP1-037) in relation to farm holdings and agricultural land;</li> <li>- ISH1_49 of The Applicants' response to Hearing Action Points due at Deadline 1 (REP1-037) in relation to engagement with the Environment Agency to resolve concerns relating to trenchless installation beneath the sand dunes (Lytham St Annes SSSI); and</li> <li>- Annex 5.10 to the Applicants response to Hearing Action Points: ISH1 52 (REP1_046) in relation to effects on local business and tourism.</li> </ul>
REP1-218 1.2	Traffic congestion, I personally do not believe that there is not another way for such. We live in beautiful communities that we are all proud of.	The Applicants acknowledge Ms Thomas' concerns relating to potential traffic congestion. The Applicants have provided a response to these concerns at section 2.32 of The Applicants' Response to Relevant Representations Part 1 - Introduction and thematic responses (PDA-005). Subject to the grant of the DCO, the Applicants would note that the effects of construction traffic and highway works from Transmission Assets would be managed, monitored and controlled through the development of the detailed CTMPs. In compliance with Requirement 9 of Schedules 2A and 2B of the draft DCO (REP1-008), the detailed CTMPs would need to be agreed with the relevant highway authorities. In approving the detailed CTMPs the relevant highway authorities would apply their statutory duties under the Traffic Management Act, 2004 to ensure the "expeditious movement of traffic on the authority's road network".
REP1-218	We live in beautiful communities that we are all proud of. Please do not destroy hundreds of years of hard work and	The Applicants acknowledge Ms Thomas' concerns regarding mental health.

Reference	Written Representation Comment	Applicants' response
1.3	sacrifice our history and farming. I'm sure there is an alternative solution. This will affect peoples mental health and bring on unnecessary stress for many years, to come. I truly hope and pray that you will not continue to proceed. Please look for another alternative. You are asking us to sacrifice too much	<p>The Applicants have previously addressed concerns relating to human health, including mental health at section 2.19 of The Applicants' Response to Relevant Representations Part 1 - Introduction and thematic responses (PDA-005). This confirms that an assessment of human health (including mental health) is contained in Volume 1 Annex 5.1: Human Health (APP-035) and outlines various measures aimed at ensuring the continued health and wellbeing of the local population and how these are secured through the draft Development Consent Order (REP1-008).</p> <p>The Applicants are committed to developing the Transmission Assets in a way that is sensitive to the environment, minimising potential effects wherever possible. Impacts which have the potential to give rise to likely significant effects have been carefully assessed and appropriate mitigation identified throughout the Environmental Statement. Those measures are secured through the Requirements set out in Schedules 2A and 2B of the draft DCO (REP1-009). Mitigations are also set out in the updated Commitments Register (Annex 5.3: Volume 1 (F1.5.3/F03) submitted at Deadline 2.</p>

## 2.43 Joanne Hardy (REP1-222)

**Table 2.39: REP1-222 – Joanne Hardy**

Reference	Written Representation Comment	Applicants' response
REP1-222 1.1	1. Previously marsh land, prone to significant flooding, significantly in the last 4 years the fylde coast, south of Blackpool to the river a ribble and inland has suffered recurrently with flooding, damage to land, property damage	The Applicants acknowledge Ms Hardy's concerns in relation to flooding. The Applicants have previously responded to flood risk concerns at section 2.16 of The Applicants' Response to Relevant Representations Part 1 - Introduction and thematic responses (PDA-005).

Reference	Written Representation Comment	Applicants' response
	and with failing infrastructure for drainage and maintenance of roads, sewers, and dykes. The wind farm project will further impact the flood levels with the building of cable corridors and concrete added removing drainage for the land, increasing flood risks.	<p>The Applicants note that an assessment of the potential for increased flood risk arising from additional surface water runoff is presented within section 2.11.3 of Volume 3, Chapter 2: Hydrology and flood risk of the ES (APP-070). An Outline Code of Construction Practice (APP-193) has been prepared and submitted with the application for development consent. The Outline CoCP includes measures in relation to flood risk during the construction phase (which is secured via Requirement 8 of Schedules 2A and 2B of the draft DCO (REP1-008))</p> <p>. The measures include ensuring that surface water runoff is intercepted and attenuated on site, and that surface water discharges are controlled in in quality and volume to ensure there is no increase to flood risk.</p> <p>Paragraph 2.11.3.21 of Volume 3 Chapter 2: Hydrology and flood risk (APP-070) states that due to the negligible increases in impermeable area associated with the landfall, onshore export cable corridor and 400 kV grid connection cable (associated with transition joint bay and link box manhole covers) only negligible increases in surface water runoff will occur. As a result, new impermeable areas associated with these aspects of the Transmission Assets will not increase flood risk during the operational and maintenance phase and no drainage to mitigate surface water runoff will be required.</p> <p>The Applicants also note that they are in ongoing dialogue with the Environment Agency (EA) and have resolved a number of matters with them as confirmed by the EA's written representation REP1-076. The Applicants are continuing to actively engage with the Environment Agency to resolve all outstanding matters with the Environment Agency.</p>
REP1-222 1.2	2. The Fylde coast has limited road infrastructure, a single road closure or set of temporary traffic lights can grind the road network to a complete halt for hours.	<p>The Applicants acknowledge Ms Hardys' concerns relating to potential traffic congestion and disruption. The Applicants have provided a response to these concerns at section 2.32 of The Applicants' Response to Relevant Representations Part 1 - Introduction and thematic responses (PDA-005). Subject to the grant of the DCO, the Applicants would note that the effects of construction traffic and highway works from Transmission Assets would be managed, monitored and controlled through the development of the detailed CTMPs. In compliance with Requirement 9 of Schedules 2A and 2B of the draft DCO (REP1-008), the detailed CTMPs would need</p>

Reference	Written Representation Comment	Applicants' response
		to be agreed with the relevant highway authorities. In approving the detailed CTMPs the relevant highway authorities would apply their statutory duties under the Traffic Management Act, 2004 to ensure the "expeditious movement of traffic on the authority's road network".
REP1-222 1.3	3. Tourism and agriculture will be enormously affected by the planned installation of cable corridors and substations with disruption for years. These may never recover impacting on future economy, unemployment and pressure on social needs.	<p>The Applicants addressed concerns relating to agriculture impacts at section 2.3 of The Applicants' Response to Relevant Representations Part 1 - Introduction and thematic responses (PDA-005) which sets out how the Applicants have sought to minimise impacts on agricultural land. The Applicants also addressed concerns relating to disruption to tourism and local communities and businesses at section 2.21 of The Applicants' Response to Relevant Representations Part 1 - Introduction and thematic responses (PDA-005).</p> <p>Potential impacts on farm holdings and agricultural land were also discussed at Issue Specific Hearing 1 (see paragraphs 65 – 75 of The Applicants' Hearing Summary of Issue Specific Hearing 1 – Day 2 (REP1-035)) and Compulsory Acquisition Hearing 1 (see paragraph 22 of The Applicants' Hearing Summary of Compulsory Acquisition Hearing 1 (REP1-036)) following which the Applicants have responded to a number of Hearing Action Points relating to these matters. Please see ISH1_46, ISH1_47 and CAH1_5 of The Applicants' response to Hearing Action Points due at Deadline 1 (REP1-037).</p> <p>The Applicants have also provided further clarifications in relation to effects on local business and tourism at Deadline 1 in Annex 5.10 to the Applicants response to Hearing Action Points: ISH1 52 (REP1_046).</p>
REP1-222 1.4	4. Substations (huge size) siting between many schools; primary and secondary and the daily disruption, noise level pollution will affect the young population.	In response to similar concerns raised in relevant representations about the siting of the substation (including its proximity to schools), the Applicants provided an explanation of the site selection process undertaken by the Applicants at sections 2.17 and 2.31 of The Applicants' Response to Relevant Representations Part 1 - Introduction and thematic responses (PDA-005). Site selection was discussed further at Issue Specific Hearing 1 and the Applicants refer in particular to paragraphs 17 -21 and 49 to 54 of The Applicants' Hearing Summary of Issue Specific Hearing 1 – Day 2

Reference	Written Representation Comment	Applicants' response
		<p>(REP1-035). . The Applicants confirmed they have undertaken a rigorous and robust route planning and site selection process in relation to the onshore infrastructure for the Transmission Assets. This included the siting of infrastructure away from sensitive receptors such as schools and care homes. The nearest school is approximately 330m from the Transmission Assets Order Limits which is the closest point at which the onshore export cables could be installed.</p> <p>A full reasoning and justification for the selection of the onshore infrastructure, including the range of criteria used and developed throughout the iterative process is provided in Section 4.9 of Volume 1, Chapter 4: Site Selection and Consideration of Alternatives (AS-026). This is also supported by Volume 1, Annex 4.3: Selection and Refinement of the Onshore Infrastructure (APP-033).</p> <p>The Applicants have also provided further clarifications in relation to site selection including in relation to siting of the substations in response to Hearing Action Points following the hearings. Specifically, the Applicants refer to ISH_7 of The Applicants' response to Hearing Action Points due at Deadline 1 (REP1-037).</p> <p>The Applicants also acknowledge Ms Hardy's concerns around the size of each project's substation buildings. The Applicants have assessed potential adverse impacts through their environmental impact assessment reported through the relevant chapters of the Environmental Statement (ES). The ES identifies appropriate mitigation measures to minimise those impacts which are secured through the Requirements set out in Schedules 2A and 2B of the draft DCO (REP1-009). For example, the Applicants note that the substations are subject to a number of controls including Requirements 4 (substation works), 5(1) (Detailed design parameters onshore), 15 (Fencing and other means of enclosure), 17 (Control of operational artificial light emissions), 18 (Control of noise during operational stage) and 20 (Operational drainage management plan) of Schedules 2A and 2B of the draft DCO (REP1-009). Further, they are also subject to measures contained within the outline Code of Construction Practice (APP-193), outline Ecological Management Plan (J6/F02) and the outline Landscape Management Plan (AS-050) pursuant to Requirements 6, 7, 8 and 10 of Schedules 2A and 2B of the draft DCO (REP1-008).</p>

## 2.44 Mick Threlfall (REP1-223)

**Table 2.40: REP1-223 – Mick Threlfall**

Reference	Written Representation Comment	Applicants' response
REP1-223 1.1	Good Morning Reference the proposed offshore wind farm project – please see below the points I would like to make as to why I think this is a bad idea	The Applicants note this response.
REP1-223 1.2	<ul style="list-style-type: none"> <li>Kirkham Road is a extremely busy road and at certain times during the day has hundreds of school children walking to and from school – some of them unattended</li> </ul>	<p>The Applicants acknowledge Mr Threlfall's concerns relating to schools and travel routes at 2.32 of The Applicants' Response to Relevant Representations Part 1 - Introduction and thematic responses (PDA-005). Subject to the grant of the DCO, the Applicants would note that the effects of construction traffic and highway works from Transmission Assets would be managed, monitored and controlled through the development of the detailed CTMPs. In compliance with Requirement 9 of Schedules 2A and 2B of the draft DCO (REP1-008), the detailed CTMPs would need to be agreed with the relevant highway authorities. In approving the detailed CTMPs the relevant highway authorities would apply their statutory duties under the Traffic Management Act, 2004 to ensure the "expeditious movement of traffic on the authority's road network" which includes emergency services.</p> <p>The Applicants have undertaken an assessment of vulnerable groups within the Human Health Annex (APP-035) which includes consideration of impacts on young people and schools including traffic related impacts and summarises relevant mitigation measures to manage and minimise potential impacts during construction and operation of the Transmission Assets.</p>
REP1-223 1.3	<ul style="list-style-type: none"> <li>The business disruption this would cause would be massive for all the business that operate on the road. This includes our transport business which heavily relies on the use of the road to access / depart our premises. We have run out of this depot for 40+ years</li> </ul>	<p>The Applicants acknowledge Mr Threlfall's concerns relating to business disruption. The Applicants have previously addressed concerns relating to disruption to local communities and businesses at section 2.21 of The Applicants' Response to Relevant Representations Part 1 - Introduction and thematic responses (PDA-005). The Applicants have also provided further clarifications in relation to effects on local</p>

Reference	Written Representation Comment	Applicants' response
		businesses in Annex 5.10 to the Applicants response to Hearing Action Points: ISH1 52 (REP1_046).
REP1-223 1.4	<ul style="list-style-type: none"> <li>Agricultural land from Starr Gate, Blackpool to Newton Village would not be able to be farmed for up to 10 years. This would leave farmers unable to recover the true value of the land.</li> </ul>	<p>The Applicants addressed concerns relating to agricultural land impacts at section 2.3 of The Applicants' Response to Relevant Representations Part 1 - Introduction and thematic responses (PDA-005) which sets out how the Applicants have sought to minimise impacts on farmers.</p> <p>Potential impacts on farm holdings and agricultural land were also discussed at Issue Specific Hearing 1 (see paragraphs 65 – 75 of The Applicants' Hearing Summary of Issue Specific Hearing 1 – Day 2 (REP1-035)) and Compulsory Acquisition Hearing 1 (see paragraph 22 of The Applicants' Hearing Summary of Compulsory Acquisition Hearing 1 (REP1-036)) following which the Applicants have responded to a number of Hearing Action Points relating to these matters. Please see ISH1_46, ISH1_47 and CAH1_5 of The Applicants' response to Hearing Action Points due at Deadline 1 (REP1-037).</p>
REP1-223 1.5	<ul style="list-style-type: none"> <li>The 3 buildings proposed to be built near Newton – up to 30 metres high – will be a massive blot on the landscape and will no doubt encourage further expansion causing huge disruption to all local travel</li> </ul>	<p>The Applicants acknowledge Ms Threlfall's concerns around the size of each project's substation buildings. To clarify, whilst lightning rods may be up to 30 metres high, the maximum height of the substation buildings is 15 metres for Morgan OWL and 13 metres for Morecambe OWL. This is secured through Requirement 5(1) of Schedules 2A and 2B of the draft DCO (REP1-008).</p> <p>The Applicants have assessed potential adverse impacts of the substations through their environmental impact assessment reported through the relevant chapters of the Environmental Statement (ES). The ES identifies appropriate mitigation measures to minimise those impacts which are secured through the Requirements set out in Schedules 2A and 2B of the draft DCO (REP1-009). For example, the Applicants note that the substations are subject to a number of controls including Requirements 4 (substation works), 5(1) (Detailed design parameters onshore), 15 (Fencing and other means of enclosure), 17 (Control of operational artificial light emissions), 18 (Control of noise during operational stage) and 20 (Operational drainage management plan) of Schedules 2A and 2B of the draft DCO (REP1-009). Further, they are also subject to measures contained within the outline Code of Construction Practice (APP-193),</p>

Reference	Written Representation Comment	Applicants' response
		outline Ecological Management Plan (J6/F02) and the outline Landscape Management Plan (AS-050) pursuant to Requirements 6, 7, 8 and 10 of Schedules 2A and 2B of the draft DCO (REP1-008).
REP1-223 1.6	<ul style="list-style-type: none"> <li>Our company itself has 40 employees that depend on the business running to the scale it is now. They all require to travel on Kirkham Road up to 6 days a week to attend work and with the location of the business other routes are not available.</li> </ul>	The Applicants refer Mr Threlfall to responses at REP1-223 1.2 and REP1-223 1.3 above.
REP1-223 1.7	<ul style="list-style-type: none"> <li>The cost and timescale of the proposals are not sustainable to enhance the improvements desired to our economy. Personally, all I can see this achieving is further government debt to be attained.</li> </ul>	The National Policy Statements (NPSs) establish the policy need for new renewable energy generation. NPS EN-3 identifies new offshore wind projects as a critical national priority infrastructure, for which there is an urgent need. The policy and legislative support for the scheme is set out in full in the Planning Statement (REP1-032). In particular, the Applicants maintain, as set out in section 6 of the Planning Statement (REP1-032), the benefits of the proposed development outweigh any adverse impacts.
REP1-223 1.8	I am happy to discuss this further if required but I hope you take the time to read and understand the points I make to show why I feel this proposal could only have a negative effect on the local area.	The Applicants note this response.

## 3 Responses to Hearing Summaries

### 3.1 Andrew Treharne (REP1-102)

**Table 3.1: REP1-102 – Andrew Treharne**

Reference	Hearing Summary	Applicants' response
REP1-102 1.1	<p>This issue of beach closures was mentioned yesterday, I think by Mr Morgan. In response, a representative of the applicant said the beach wouldn't be closed and mentioned something along the lines of there being some areas fenced off during construction. I couldn't put my hand on the relevant part of their application in time, I found it this morning.</p> <p>In the application document, PEIR Volume 3 Chapter 6, it states that "Beach closures to be no longer than 6 months."</p> <p>Significant things like this are buried in hundreds of pages and then lack sufficient information to be able to judge their impact.</p>	<p>The Applicants note that PEIR Volume 3, Chapter 6: Land Use and Recreation has been superseded by the submitted application documentation. Volume 3, Chapter 6: Land Use and Recreation of the ES (APP-104) makes no reference to beach closures as the project no longer identified this as a need for construction. The Applicants can categorically state that Lytham St Annes Beach will not be closed and that for works happening in a relatively small, discrete area on or close to the beach, such as work at compounds and cofferdams, only the immediate vicinity will be closed and demarcated with fencing or other appropriate barriers ensuring access to the remainder of the beach is unaffected.</p> <p>Following the discussions at the Hearings, and in response to Hearing Action Points, the Applicants provided further detailed technical clarifications in relation to beach access in Annex 5.3 to the Applicants response to Hearing Action Points: ISH1 13, 14, 16, 17 (REP1-040).</p> <p>Further details of the public access to the beach during construction is set out in The Outline Open Space Management Plan which is at Appendix A of the Outline Public Rights of Way (PRoW) Management Plan (AS-048). This sets out the discrete working areas that will be subject to access management during construction works.</p>
REP1-102 1.2	<p>In response to my question today, they mentioned that the playing fields are much larger than the golf course. Perhaps I misheard, as the golf course is multiple times the size of the fields.</p>	<p>The Applicants can confirm that the golf course at St Anne's Old Links is much larger than the Blackpool Recreation Ground playing fields. The Applicants would direct Mr Treharne to paragraph 90 of The Applicants' Hearing Summary of Issue Specific Hearing 1 – Day 1 (REP1-034) which discussed the point Mr Treharne is referring to, for full context.</p>

## 3.2 Helen Molloy (REP1-149)

**Table 3.2: REP1-149 – Helen Molloy**

Reference	Hearing Summary	Applicants' response
REP1-149 1.1	After attending the 4 days consultations at Blackpool Grand Hotel with the four Governments representatives, Morgan & Morecambe, local residents, councillors, businesses, land owners, wildlife representatives. I do believe M&M have not even considered an alternative route at a fraction of the cost which could save not only billions, but also save a vast amount of land required for the proposed cable route.	The Applicants acknowledge Ms Molloy's concerns. The Applicants provided comments on site selection and the assessment of alternatives including suggesting that the Point of Interconnection for the Transmission Assets should be at or via Stanah. The Applicants provided an initial response on site selection and the assessment of alternatives at section 2.31.1 of The Applicants' Response to Relevant Representations Part 1 - Introduction and thematic responses (PDA-005). Following discussions relating to site selection and alternatives at Issue Specific Hearing 1, and in response to a number of the Examining Authority's Hearing Action Points, the Applicants provided a detailed technical response on these matters including explaining why the proposed alternative connection to Stanah is not a viable or feasible alternative route or Point of Interconnection for the Transmission Assets. This was provided at Deadline 1 in Annex 5.2 to the Applicants response to Hearing Action Points: ISH1 6, 8, 9, 19, 26 & 28 - Rev F01 (REP1-039). A summary of the position is provided at section 1.1 above.
REP1-149 1.2	I am greatly concerned regarding many different aspects such as when M&M barrister stated a Fylde councillor was incorrect in stating the beach would be closed. The corridor has to come onshore and go down the beach and also cross a major Rd the A584.	The Applicants previously addressed concerns relating to beach access in section 2.5 of The Applicants' Response to Relevant Representations Part 1 - Introduction and thematic responses (PDA-005). Following the discussions at the Hearings, and in response to Hearing Action Points, the Applicants provided further detailed technical clarifications in relation to beach access in Annex 5.3 to the Applicants response to Hearing Action Points: ISH1 13, 14, 16, 17 (REP1-040).  Further details of the public access to the beach during construction is set out in The Outline Open Space Management Plan which is at Appendix A of the Outline Public Rights of Way (PRoW) Management Plan (AS-048). This sets out the discrete working areas that will be subject to access management during construction works.
REP1-149 1.3	The alternative route which seems to have been completely dismissed, or not even looked at, is a much shorter route, more direct, also has some things already in place	Please refer to the response at REP1-149 1.1 above regarding the concerns around site selection and alternatives.

Reference	Hearing Summary	Applicants' response
	<p>regarding the national grid.Plus it would take less constrction ttime and save so much agricultural land .cause less impact on the enviroment, commuting,and local communities... I also discovered during this consultation that there would be two sets of cables corridors being constructed at different times along with the same regarding the two different substations as each company will be working on their own . . Airspace is also a concern Blackpool Airport , but more so Bae Systems who supply the countries aeroplanes for our countries defence.</p>	<p>With regards to the concerns about construction scenarios, the Applicants explained their approach to construction scenarios and coordination between Morgan OWL and Morecambe OWL at Issue Specific Hearing 1 (see in particular paragraphs 11 - 34 of The Applicants' Hearing Summary of Issue Specific Hearing 1 – Day 2 (REP1-035)). Following the hearings, the Applicants provided a detailed technical response to these points within Annex 5.2 to the Applicants response to Hearing Action Points: ISH1 6, 8, 9, 19, 26 &amp; 28 - Rev F01 (REP1-039). Section 7 of REP1-039 sets out how Morgan OWL and Morecambe OWL will continue to work together post consent to deliver the two projects comprised within the Transmission Assets. Section 8 of REP1-039 clearly explains why flexibility must be retained within the draft DCO (REP1-008) to allow for the projects to be constructed in different ways and why Morgan OWL and Morecambe OWL cannot commit to concurrent construction within the draft DCO.</p> <p>The Applicants also acknowledge concerns raised at Issue Specific Hearing 1 relating to air safety linked to bird strike. The Applicants confirmed at Issue Specific Hearing 1 that engagement with BAE and Blackpool Airport is ongoing in order to agree a strategy for a bird strike management plan (see paragraphs 60 - 64 of The Applicants' Hearing Summary of Issue Specific Hearing 1 – Day 2 (REP1-035)). The Applicants also provided responses in relation to this matter at ISH1_40 of The Applicants' response to Hearing Action Points due at Deadline 1 (REP1-037) and provided further detail in relation to engagement with both BAE and Blackpool Airport in the Deadline 1 Cover letter (REP1-001). At deadline 2, the Applicants have submitted the Strategy for Wildlife Hazard Management Plan (S_D2_14) which has been shared with BAE and Blackpool Airport as part of the Applicants ongoing engagement with those bodies as explained in the Applicants responses to Blackpool Airport and BAE written representations in The Applicants Responses to Written Representations from Statutory Consultees and other organisations (S_D2_3). The Applicants will continue to actively engage with BAE and Blackpool Airport to resolve their concerns in relation to bird strike.</p>
REP1-149 1.4	<p>The Fylde itself is a holiday destination that would be greatly affected by the cable corridor and commuting around the Fylde ., which in itself would cause an impact on the Four Emergency Services as there are only two major routes across the Fylde from the M6 Preston ( which had accidents almost every day) . which are the A584 &amp;</p>	<p>The Applicants also addressed concerns relating to disruption to tourism and local communities and businesses at section 2.21 of The Applicants' Response to Relevant Representations Part 1 - Introduction and thematic responses (PDA-005). The Applicants have also provided further clarifications in relation to effects on local business and tourism at Deadline 1 in Annex 5.10 to the Applicants response to Hearing Action Points: ISH1 52 (REP1_046).</p>

Reference	Hearing Summary	Applicants' response
	A583. Of late even temporary traffic lights have caused delays of over half an hour , longer at rush hour.	<p>With regards to impacts on emergency services, the Applicants have assessed the potential impact of the Transmission Assets on emergency services in Volume 3, Chapter 7: Traffic and Transport (APP-108) which considers the Transmission Assets traffic in relation to driver delay, severance, non-motorised user delay, fear and intimidation, road safety and abnormal loads. The assessment concludes (with the application of the mitigation measures described below) that the residual effects upon all road users (including emergency services) would not be significant in Environmental Impact Assessment (EIA) terms which means that further mitigation is not required.</p> <p>The Applicants highlight that extensive commitments have been made to the use of trenchless installation techniques, such as Horizontal Directional Drilling (HDD) to minimise disruption to all A, B and Classified roads (with the exception of Leach Lane) and railways proposed to be crossed by the Transmission Assets (see CoT02, Volume 1, Annex 5.3: Commitments Register (F 1.5.3/F03)). This commitment to the use of trenchless techniques is secured via Requirement 8 (Code of Construction Practice) of Schedules 2A and 2B of the draft DCO (REP1-008). With regard to Leach Lane, the Applicants have committed to maintaining access, with works completed on a 'half / half basis' with traffic to be controlled through the use of temporary traffic management, such as traffic signals. The open cut trenching on Leach Lane is not expected to result in any road closures and vehicular access would always be maintained including for emergency services and for buses. The approach to managing highway crossings is outlined in Section 1.10 of the Outline Construction Traffic Management Plan (OCTMP) (J5/F02). The requirement to produce the detailed CTMP(s) in accordance with the OCTMP in consultation with, and for approval by, the relevant highway authority, is secured by Requirement 9 of Schedules 2A and 2B of the draft DCO (REP1-008).</p> <p>Subject to the grant of the DCO, the Applicants would note that the effects of construction traffic and highway works from Transmission Assets would be managed, monitored and controlled through the development of the detailed CTMPs. In compliance with Requirement 9, the detailed CTMPs would need to be agreed with the relevant highway authorities. In approving the detailed CTMPs the relevant highway authorities would apply their statutory duties under the Traffic Management Act, 2004 to ensure the "expeditious movement of traffic on the authority's road network" which includes emergency services.</p>

Reference	Hearing Summary	Applicants' response
REP1-149 1.5	<p>The Fylde itself is a holiday destination that would be greatly affected by the cable corridor and commuting around the Fylde ., which in itself would cause an impact on the Four Emergency Services as there are only two major routes across the Fylde from the M6 Preston ( which had accidents almost every day) . which are the A584 &amp; A583. Of late even temporary traffic lights have caused delays of over half an hour , longer at rush hour. Is windfarms cost effective in the long run when you take into account the costs of time , constuction , man hours , upkeep etc when a wind turbine has a life span of approx 20 years and the proposed route could take 10 years plus the maintainance etc. The loss of land, disruption , congestion, mental distress for local residents , the construction traffic , construction noise , compulsory purchases , farmers who have had their fams for generations , homes &amp; schools in extremely close proximity to the cable route and substations.</p>	<p>Please refer to the response at REP1-149 1.5 above regarding the concerns as to access for the emergency services.</p> <p>The Applicants have responded to the various concerns raised by Mrs Molloy as follows:</p> <ul style="list-style-type: none"> <li>As for concerns around loss of land, the applicants would direct Mrs Molloy to paragraphs 21 and 22 of The Applicants' Hearing Summary of the Compulsory Acquisition Hearing 1 (REP1-036) and section 2.3.2 of The Applicants' Response to Relevant Representations Part 1 - Introduction and thematic responses (PDA-005);</li> <li>The Applicants acknowledge Mrs Molloy's concerns relating to potential traffic congestion and disruption. The Applicants have provided a response to these concerns at section 2.32 of The Applicants' Response to Relevant Representations Part 1 - Introduction and thematic responses (PDA-005).</li> <li>The Applicants have previously responded to concerns relating to noise within sections 2.4, 2.9 and 2.24 of The Applicants' Response to Relevant Representations Part 1 - Introduction and thematic responses (PDA-005).</li> <li>The Applicants addressed concerns relating to agricultural land impacts at section 2.3 of The Applicants' Response to Relevant Representations Part 1 - Introduction and thematic responses (PDA-005) which sets out how the Applicants have sought to minimise impacts on agricultural land.</li> <li>Potential impacts on farm holdings and agricultural land were also discussed at Issue Specific Hearing 1 (see paragraphs 65 – 75 of The Applicants' Hearing Summary of Issue Specific Hearing 1 – Day 2 (REP1-035)) and Compulsory Acquisition Hearing 1 (see paragraph 22 of The Applicants' Hearing Summary of Compulsory Acquisition Hearing 1 (REP1-036)) following which the Applicants have responded to a number of Hearing Action Points relating to these matters. Please see ISH1_46, ISH1_47 and CAH1_5 of The Applicants' response to Hearing Action Points due at Deadline 1 (REP1-037).</li> <li>The Applicants responded to concerns raised relating to schools and travel routes at 2.32 of The Applicants' Response to Relevant Representations Part 1 - Introduction and thematic responses (PDA-005).</li> </ul>

Reference	Hearing Summary	Applicants' response
		<ul style="list-style-type: none"> <li>The Applicants have undertaken an assessment of vulnerable groups within the Human Health Annex (APP-035) which includes consideration of impacts on mental health, young people and schools including traffic related impacts and summarises relevant mitigation measures to manage and minimise potential impacts during construction and operation of the Transmission Assets.</li> </ul>
REP1-149 1.6	As a local resident I have even more concerns now than I previously did . I believe tick boxes have been ticked but the real issues and concerns and justifications have not all been taken into account.	The Applicants note the response from Mrs Molloy and recognise those concerns. The Applicants are confident that the application has adequately addressed all concerns raised by stakeholders through the pre-application process and will continue to engage with the process to aid the Examining Authority in the examination process.

### 3.2.1.1

## 3.3 Christine Abbot (REP1-226)

**Table 3.3: REP1-226 – Christine Abbot**

Reference	Hearing Summary	Applicants' response
REP1-226 1.1	<p>Further to my oral representation at the open floor hearing on 29th April, I would like to add further reasoning as to why I believe the proposed Plan in its current format, should not proceed.</p> <p>I spoke about the wholly inadequate Consultation process and the devastating impact on Greenbelt land, Marine Conservation Zones and high value agricultural land by damaging wildlife and their habitats.</p>	<p>The Applicants welcome the response from Mrs Abbott and note her concerns raised.</p> <p><b>Consultation</b></p> <p>The Applicants take consultation and ongoing communications with the community seriously.</p> <p>The Applicants have responded to concerns in relation to Consultation in Section 2.2.2 of The Applicants' Response to Relevant Representations Part 1 - Introduction and thematic responses (PDA-005) in particular noting that the Acceptance Checklist (s55) (PD-003) where the Planning Inspectorate confirms in relation to adequacy of consultation it "is satisfied that the Applicants have complied with their statutory obligations." The Applicants note this was similarly acknowledged by the Examining</p>

Reference	Hearing Summary	Applicants' response
		<p>Authority (see paragraph 30 of The Applicants' Hearing Summary of the Compulsory Acquisition Hearing 1 (REP1-036)).</p> <p>The Applicants also note that they have carried out extensive rounds of non-statutory consultation, alongside statutory consultations in accordance with the Planning Act 2008. A range of consultation events were held in the vicinity of the proposed Transmission Assets, including online events, exhibitions and pop-up events between November and December 2022, April and June 2023, and October and December 2023. These events were advertised in local newspapers, on local radio, on posters in the local area, through postcards and newsletters distributed through the local area and on social media.</p> <p>Further details can be found in the Consultation Report (APP-170).</p> <p><b>Green belt</b></p> <p>In response to concerns in relation to the use of green belt, the Applicants previously provided a response to these concerns at section 2.17 and 2.31 of The Applicants' Response to Relevant Representations Part 1 - Introduction and thematic responses (PDA-005). Site selection and green belt was discussed further at Issue Specific Hearing 1 and the Applicants refer in particular to paragraphs 17 -21 and 49 to 54 of The Applicants' Hearing Summary of Issue Specific Hearing 1 – Day 2 (REP1-035). The Applicants have also provided further clarifications in relation to site selection and green belt in response to Hearing Action Points following the hearings. Specifically, the Applicants refer to ISH_7 of The Applicants' response to Hearing Action Points due at Deadline 1 (REP1-037).</p> <p><b>MCZ</b></p> <p>The Applicants set out the constraints considered when selecting the offshore route to landfall and the crossing of the dunes and how this sought to avoid sensitive areas site selection and the Fylde MCZ during the Issue Specific Hearings. Please refer to the Applicants' Hearing Summary of the Issue Specific Hearing 1: Day 1 Rev F01 (REP1-034), in particular paragraphs 42 and 43.</p>

Reference	Hearing Summary	Applicants' response
		<b>Agricultural land</b> <p>The Applicants addressed concerns relating to agricultural land impacts at section 2.3 of The Applicants' Response to Relevant Representations Part 1 - Introduction and thematic responses (PDA-005) which sets out how the Applicants have sought to minimise impacts on agricultural land.</p>
<p>REP1-226</p> <p>1.2</p>	<p><b>DUNES</b></p> <p>More than 80% of Lancashire beaches have been lost in the past 150 years due to urban expansion and erosion. The dunes play a vital role in coastal defence acting as a natural barrier against sea erosion and flooding.</p> <p>The Fylde Sand Dunes Project overseen by Lancashire Wildlife Trust and Blackpool and Fylde Council enhance biodiversity by planting trees and maram grass to stabilise the dunes and to encourage the accretion of sand blown in for future dune growth. They have helped the sand dunes grow strong and resilient and formed extensive habitats for especially adapted animals as well as a natural defence against extreme weather conditions. They successfully reintroduced the sand lizard, one of the UK'S rarest reptiles back to the dunes established new populations. The Project received an allocation of nearly 1 million from The Environment Agency to extend the project for the next five years.</p> <p>Pipework at the dunes will undo this vital work and cause devastating effects to wildlife and habitats, threatening the hydrology of the dunes and the viability of the sea defences. The presence of export cables beneath SSSI will likely disrupt the aquifer that sustains the dune slacks on a permanent basis. This is a huge unknown risk, the</p>	<p>The Applicants acknowledge that a number of representations have raised concerns relating to the sand dunes and impacts on Lytham St Annes SSSI. The Applicants have previously addressed concerns relating to the sand dunes at section 2.30 of The Applicants' Response to Relevant Representations Part 1 - Introduction and thematic responses (PDA-005). Further to this, the Applicants are in ongoing dialogue with the Environment Agency (EA) to actively engage with the Environment Agency to resolve their concerns including those relating to the Lytham St Annes SSSI (sand dunes) as set out at ISH1_49 of The Applicants' response to Hearing Action Points due at Deadline 1 (REP1-037). This includes providing a preliminary hydrogeological risk assessment in relation to the trenchless installation beneath Lytham St Annes SSSI at Deadline 3.</p> <p>The Applicants refer Mrs Abbot to Annex 5.3 to the Applicants response to Hearing Action Points: ISH1 13, 14, 16, 17 (REP1-040) in relation to beach access. Further details of the public access to the beach during construction is set out in The Outline Open Space Management Plan which is at Appendix A of the Outline Public Rights of Way (PRoW) Management Plan (AS-048). This sets out the discrete working areas that will be subject to access management during construction works.</p>

Reference	Hearing Summary	Applicants' response
	<p>impact of which will not be clarified until after DCO consent is granted and at detailed design stage.</p> <p>The Direct Pipe technology the Applicant briefly refers to will still require excavating the huge borehole and installing the pipeline, will still require the beach to be cleared and closed and tracks to be made for tankers and will still create huge amounts of noise, pollution, wildlife disturbance and chaos on the roads.</p>	
REP1-226 1.3	<p><b>ECOLOGY</b></p> <p>National Resources Institute in Finland 2023, showed how 70% of birds mammals and fish are displaced from homes by wind power developments. The noise and devastation for many years over such a large area of feeding, roosting and migratory sites would be a disaster to fragile ecosystem habitats.</p> <p>No effective seasonal restrictions have been committed to by The Applicant – indeed the very exact overwintering area for pink footed geese is where the Morgan substation is proposed to be built. We filmed hundreds of these birds in this area in one day earlier this year, far more that the Applicant states arrive each year in their migratory birds technical data.</p> <p>The Plan demonstrates a huge gap between policy rhetoric and practical implementation e.g. the plans overlap with herring spawning and seal at sea areas which suggests potential ecological risks are not fully addressed</p>	<p>The Applicants note Mrs Abbot's concerns and respond to these points below.</p> <p>The Applicants have made a commitment (CoT129 of Volume 1, Annex 5.3: Commitments Register (F1.5.3/F03)) submitted at Deadline 2 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 submitted at Deadline 2 (J6/F02).</p> <p>The Applicants have assessed potential adverse impacts through their environmental impact assessment reported through the relevant chapters of the Environmental Statement (ES). The ES identifies appropriate mitigation measures to minimise those impacts which are secured through the Requirements set out in Schedules 2A and 2B of the draft DCO (REP1-009). The Applicants refer Mrs Abbot to ISH1_22 of REP1-037 which explains how the Environmental Statement has been carried out in using the Rochdale Envelope approach. This ensures that the Applicants have assessed the worst case scenario and therefore have a full understanding of the implications of onshore environmental impacts. Mitigations are set out in the Commitments Register (Annex 5.3: Volume 1 (F 1.5.3/F03)).</p> <p>The Applicants confirmed at Issue Specific Hearing 1 that there is no legal requirement for the Transmission Assets to provide BNG and as such, it is being provided on a voluntary basis. (See paragraph 86 of The Applicants' Hearing Summary of Issue Specific Hearing 1 – Day 2 (REP1-035).) The Applicants Onshore Biodiversity Benefit Statement (J11/F03) explains the approach taken by the Applicants and confirms that</p>

Reference	Hearing Summary	Applicants' response
	<p>and without insufficient details. The Applicants prove their data is flawed and there are errors in habitat mapping.</p> <p>The information provided in the Environment Statement is not sufficient to understand the implications of onshore environmental impacts as their conclusions are not properly justified and the Plans are too vague.</p> <p>The Biodiversity Statement [AS-054] suggests the Applicants only provide Biodiversity Net Gain for the permanent land take and has failed to include the land planned for the cable route. Land that is not used temporarily and not fully reinstated for two years should also be included in the BNG calculation.</p>	<p>the calculation undertaken for biodiversity benefit utilises the latest Defra Biodiversity Metric (version 4.1) in line with guidance and NPS EN-1.</p>
REP1-226 1.4	<p><b>HERITAGE</b></p> <p>Thames Street is south of Newton and is proposed for HGV access. It is recorded by The Lancashire Historic Environment Record as being 'one of the richest areas of Neolithic to Bronze Activity within the North West'. The proposed route will destroy the valuable, unique history of the area and cause damage to unknown historic buried artefacts.</p>	<p>The Applicants can confirm that Thames Street is not identified for HGV access. Work Number 34A34B are identified on Thames Street on the Works Plans – Onshore and Intertidal (Part 2 of 2) (AS-017). Work Number 34A34B is for operational (i.e. not construction) access.</p> <p>Section 3.15.6 of Volume 1, Chapter 3: Project Description of the ES (F1.3/F03) states that 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.</p>
REP1-226 1.5	<p><b>HYDRAULIC FRACTURING</b></p> <p>Hydraulic fracturing in the Fylde left an underground footprint. It caused over 50 seismic events in the area and 2 earthquakes. The proposed Plans Order limit runs in close proximity to the shale gas exploration sites at Preston New Road and Anna's Road, Ballam.</p>	<p>The Applicants recognise that the Fylde has diverse geology that may present challenges for construction of the Transmission Assets. To ensure safe and appropriate construction, detailed ground investigations will be undertaken post-consent to inform the final cable route design and construction methodology. These investigations will provide key information on ground conditions, including the presence and characteristics of any faults, to ensure that the design and construction activities avoid or appropriately manage any associated risks.</p>

Reference	Hearing Summary	Applicants' response
	<p>There is a reported compromise of abandoned well integrity in this area. No ongoing monitoring for these wells means we do not know if they are leaking. Durham University confirmed the loss of integrity of a well could lead to the risk of groundwater contamination which provides a third of our drinking water. Any damage to the well could cause contaminated fracking fluid leaking into the local aquifer with the resulting contamination of the water. The Environment Agency have no data regarding groundwater monitoring at this site. Any underground disturbance with cable laying could potentially pollute soil, air and water.</p> <p>Furthermore, Cuadrilla breached environmental legislation with fracking fluid from the site going into Carr Bridge Brook. Drone footage shows the leakage from the site into the field. The site is quite often underwater due to rain which poses a pollution risk. Our landscape is flat and floods easily and contamination can go anywhere.</p> <p>Residents in the Ballam area are already extremely concerned regarding the slip of the land, subsidence and damage to their properties, unsafe drinking water and constant discoloured surface water and flooding.</p> <p>It is a unknown risk to take and I would implore the Planning Inspectorate to dismiss this route in the interests of public health and safety.</p>	<p>The Applicants have also committed via CoT04 (see Volume 1, Annex 5.3: Commitments Register (F 1.5.3/F03)) to a detailed Pollution Prevention Plan (PPP) which will form part of the Code of Construction Practice. Detailed PPP(s) will be developed in accordance with the Outline PPP (APP-197) and includes details of breakout plans which would cover potential impacts from fracking. Good practice guidance detailed in the Environment Agency's Pollution Prevention Guidance notes (including Pollution Prevention Guidance notes 01, 05, 08 and 21) will be followed where appropriate, or the latest relevant available guidance. The Applicants further note that this is secured by Requirement 8 of Schedules 2A and 2B of the draft DCO (REP1-008) which requires the detailed pollution prevention plan(s) to be prepared and provided to the relevant planning authority for approval before commencing the relevant stage of onshore or intertidal works. The Relevant planning authority will engage various consultees as appropriate. This Requirement ensures the detailed pollution prevention plans would be implemented as approved.</p>
REP1-226 1.6	<p><b>FAULT ZONES</b></p> <p>The Fylde has a very complex geological structure. It is heavily faulted. Trenching near or across an active or</p>	<p>The Applicants refer Mrs Abbott to REP1-226 1.5 regarding post-consent surveys and commitments regarding risk of breakouts.</p>

Reference	Hearing Summary	Applicants' response
	shallow fault may disrupt fault zones. Excavation could destabilise pre-existing faults, potentially triggering further seismic activity. The area around Ballam and Annas' Road already suffers from land slip and the Environment Agency confirms this area is critically stressed. The planned cable route runs close to the Wakepark Fault leading from Anna's Road to Preston New Road. Faults are unpredictable and excavation can be a fast track route for gas and fluids to reach the surface from previous fracking activities.	
REP1-226 1.7	<p><b>FLOODING</b></p> <p>The Project will adversely effect the water environment as a result of increase in surface water run off. The land drains already struggle to cope with the increase in rainfall particularly when combined with high tide. Creating large concrete pads on existing agricultural fields and heavy vehicles over significant areas will result in an unacceptable risk of further flooding after heavy rainfall.</p> <p>Hydraulic fracturing at PNR1z well at Preston New Road entered the 'Wakepark' fault around the field areas of the electric substation on Peel Road. The earthquakes appear to have caused an increase in ground water flow coming up so flood water has nowhere to go down and remains on top. The Applicants have not considered how the seismic activity has affected the fluvial flow in this area or the potential consequences of flooding to nearby residents and their properties.</p>	<p>The Applicants note the concerns raised regarding flooding. An assessment of the potential for increased flood risk arising from additional surface water runoff is presented within section 2.11.3 of Volume 3, Chapter 2: Hydrology and flood risk of the ES (APP-070). An Outline Code of Construction Practice (APP-193) has been prepared and submitted with the application for development consent. The Outline CoCP includes measures in relation to flood risk during the construction phase (which is secured via Requirement 8 of Schedules 2A and 2B of the draft DCO (REP1-008)). The measures include ensuring that surface water runoff is intercepted and attenuated on site, and that surface water discharges are controlled in in quality and volume to ensure there is no increase to flood risk.</p> <p>Paragraph 2.11.3.21 of Volume 3 Chapter 2: Hydrology and flood risk (APP-070) states that due to the negligible increases in impermeable area associated with the landfall, onshore export cable corridor and 400 kV grid connection cable (associated with transition joint bay and link box manhole covers) only negligible increases in surface water runoff will occur. As a result, new impermeable areas associated with these aspects of the Transmission Assets will not increase flood risk during the operational and maintenance phase and no drainage to mitigate surface water runoff will be required.</p>
REP1-226 1.8	<p><b>ALTERNATIVE ROUTE</b></p> <p>I welcome the Planning Inspectorate referring to Stonehenge and the Langley Park School judgements which set great examples of the Applicants addressing</p>	<p>As noted above at section 1.1 Introduction, a number of responses have provided comments on site selection and the assessment of alternatives including suggesting that the Point of Interconnection for the Transmission Assets should be at or via Stanah. The Applicants provided an initial response on site selection and the assessment of</p>

Reference	Hearing Summary	Applicants' response
	<p>concerns of the residents. The prop plan, however, fails to demonstrate consideration of other points of connection to the National Grid which would greatly minimise impact on the environment and community.</p> <p>An already established connection via the National Grid line of an Irish Sea Wind Farm is in Penwortham. The existing line is 400KV capability already and with the addition of cables on the existing pylon system would generate more offshore wind power. Costing data from IET 2025 on Transmission Technologies suggests a saving of 900 million using this existing connection. This support that landfall should be based on the shortest and most direct route. The alternative route meets all 4 criteria of the HNDR:</p> <ul style="list-style-type: none"> <li>• It is shorter</li> <li>• Has available landfall</li> <li>• Connects to an available substation</li> <li>• The site owner is compliant regarding the connection.</li> </ul> <p>This route protects many miles of valuable, protected land and any future excess power could generate green hydrogen, as is proposed by the current site owner of Hill House TEZ.</p>	<p>alternatives at section 2.31.1 of The Applicants' Response to Relevant Representations Part 1 - Introduction and thematic responses (PDA-005). Following discussions relating to site selection and alternatives at Issue Specific Hearing 1 and in response to a number of the Examining Authority's Hearing Action Points, the Applicants provided a detailed technical response on these matters including explaining why the proposed alternative connection to Stanah a viable or feasible alternative route or Point of Interconnection for the Transmission Assets is not. This was provided at Deadline 1 in Annex 5.2 to the Applicants response to Hearing Action Points: ISH1 6, 8, 9, 19, 26 &amp; 28 - Rev F01 (REP1-039). A summary of the position is provided at section 1.1 above.</p> <p>The Applicants refer Mrs Abbot to Section 2 and Section 4.1 of Annex 5.2 to the Applicants response to Hearing Action Points: ISH1 6, 8, 9, 19, 26 &amp; 28 - Rev F01 (REP1-039) which specifically discuss the cases referenced.</p>
REP1-226 1.9	<p><b>CUMULATIVE IMPACTS</b></p> <p>The huge cumulative impacts need to be carefully considered alongside other huge solar farm plans nearby and offshore wind farms in the Irish Sea. Existing nuclear/solar energy already cover 225 acres within the Parish which dwarfs the small, quiet villages within. A further 32 hectare solar farm is proposed, directly opposite</p>	<p>In relation to cumulative effects and assessment the Applicants refer to their response to Relevant Representations Part 1 - Introduction and thematic responses (PDA-005) and Specific Hearing Action Point 29 which can be found in The Applicants' response to Hearing Action Points due at Deadline 1 - Rev F01 (REP1-037)</p> <p>The Applicants have carried out Cumulative Effects Assessment (CEA) screening and refer to Volume 1, Annex 5.5: Cumulative screening matrix and location plan (REP1-</p>

Reference	Hearing Summary	Applicants' response
	<p>the Applicants planned substation. No consideration has been afforded to the local community by the Applicant.</p> <p>The in- combination effects of both the generation and transmission assets must be considered for all potential impacts. The Applicant has only selectively referenced in combination effects to support its analysis of climate change impact. The infrastructure requires massive amounts of fossil fuel to produce and the reason the Applicants carbon dioxide emission forecast may drop is because the mining and manufacture of these machines is outsourced to other countries.</p> <p>The significant land take and long term loss of agricultural productivity appear a prioritisation of national targets over local policy objectives, breaching the balance required by the NPPF.</p>	<p>020) The Applicants will be submitting an update vis Review of Cumulative Effects Assessment and In-Combination Assessment at Deadline 2.</p>