

MORGAN AND MORECAMBE OFFSHORE WIND FARMS: TRANSMISSION ASSETS

Applicants' Response to Fylde Council Local Impact Report



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Contents

1	APPLICANTS' RESPONSE TO WRITTEN REPRESENTATIONS	3
1.1	Introduction	3
2	RESPONSES TO WRITTEN REPRESENTATIONS	4
2.1	Fylde Council Local Impact Report.....	4
3	REFERENCES	80

Tables

Table 2.1: REP1-078	4
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Glossary

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

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

1 Applicants' response to Written Representations

1.1 Introduction

- 1.1.1.1 Following Deadline 1, Morgan Offshore Wind Limited and Morecambe Offshore Windfarm Limited (hereafter, 'the Applicants') have taken the opportunity to review each of the Written Representations (WRs) and post hearing submissions received from stakeholders who registered as Interested Parties in the Examination.
- 1.1.1.2 Details of the Applicants' response to each of the Written Representations (WRs) and post hearing submissions 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.

2 Responses to Local Impact Reports

2.1 Fylde Council Local Impact Report

Table 2.1: REP1-078

Reference	Written Representation Comment	Applicants' response
Policy Context		
REP1-078 2.1.1	<i>National Policy and Guidance</i> The National Planning Policy Framework [NPPF] is a material consideration for the assessment of NSIPs and as such has been referred to as appropriate within this LIR. There are a number of National Policy Statements which are relevant to the assessment of NSIPs, the most pertinent being EN-1, EN-3 and EN-5.	Noted. Please see section 3.4.4 of the Planning Statement [REP1-032] for commentary regarding the relevant NPPs. See also National Planning Policy Framework Tracker [APP-231]. Please refer to the Planning Statement Addendum (S_D2_9) for commentary on the updates to the NPPF and NPS consultation.
REP1-078 2.2.1	<i>The Development Plan</i> The Fylde Local Plan to 2032 (incorporating Partial Review) [FLP] is the extant plan. The relevant policies are referenced throughout the LIR as appropriate and in response to a request, a supporting policy assessment summary is attached as Appendix 1 to this report.	The Applicants note the relevant policies listed. Key policies are set out in the National Planning Policy Framework Tracker (APP-234) and the Local Planning Policy Tracker (APP-236), both of which will be updated for Deadline 6 as requested in the Examining Authority's Rule 8 letter (PD-007) examination timetable.
REP1-078 2.2.2	FBC has published its Local Development Scheme 2025 which sets out a programme to produce the next Local Plan as the existing Local Plan will be five years old from adoption in December 2026.	Noted. Please see Planning Statement Addendum (S_D2_9) for commentary.
REP1-068 2.2.3	Initial stages of preparation of the new plan have commenced, including the issue of a call for sites. It is intended to undertake a Regulation 18 consultation in August-September 2025, with consideration of sites through the Strategic Housing and Economic Land Availability Assessment to run from May to	Noted. Please see Planning Statement Addendum (S_D2_9) for commentary. Due to the early stage of the new plan, it is not considered to be a material consideration in relation to the Examination and determination of the Transmission Assets.

Reference	Written Representation Comment	Applicants' response
	October 2025, publication for consultation under Regulation 19 stage May-June 2026, with submission proposed for August 2026.	
REP1-078 2.2.4	The new plan will run to 2042, ten years on from the existing Local Plan. FBC's intentions are that the new plan will incorporate existing policies wherever possible, subject to the outcomes of the Regulation 18 stage and national policies changes.	Noted. Please see Planning Statement Addendum (S_D2_9) for commentary. Due to the early stage of the new plan, it is not considered to be a material consideration in relation to the Examination and determination of the Transmission Assets.
REP1-078 2.3.1	<i>Other Affected Boroughs: Preston City Council and South Ribble Borough Council</i> The Central Lancashire authorities, Preston, South Ribble and Chorley, have been working together to produce a joint plan. The Central Lancashire Local Plan 2023-2041 Publication Version was published for Regulation 19 consultation between 24th February 2025 and 14th April 2025. A link to the Regulation 19 documents webpage is included in Appendix 3 to this LIR. The Local Development Scheme gives a date for submission for examination of June 2025, with adoption targeted for between July and December 2026. The published plan sets out a housing requirement of 23,652 homes between 2024 and 2041 across the three boroughs, made up of 9,360 in Preston, 8,280 in South Ribble and 6,012 in Chorley.	Noted. Please see Planning Statement Addendum (S_D2_9) for commentary. Due to the early stage of the Central Lancashire Local Plan 2023-2041 and it having not been subject to examination, it is therefore subject to change, and very little weight can be given to it at this stage. However, it is recognised this weight may increase as the Transmission Assets moves through Examination and determination and the Plan moves through the process towards adoption. The Applicants will keep this under review and update the Planning Statement as necessary before the close of the Examination.
REP1-078 2.2.4	The three local authorities have separate adopted Local Plans; all three were adopted in 2015. Preston also has a city centre plan adopted in 2016. Links to the existing plans for the authorities directly affected are provided in Appendix 3 of this LIR.	The Applicants note the relevant policies listed. Key policies are set out in the National Planning Policy Framework Tracker (APP-234) and the Local Planning Policy Tracker (APP-236), both of which will be updated for Deadline 6 as requested in the Examining Authority's Rule 8 letter (PD-007) examination timetable.
Assessment of Impacts		
REP1-078 3.1.1	<i>Structure</i> Notwithstanding FBC's position expressed above, in the interests of consistency and to assist the ExA, our assessment has been	The Applicants note Fylde Borough Council's comments as part of the Local Impact Report and have provided responses to each point raised below.

Reference	Written Representation Comment	Applicants' response
	arranged with reference to the list of matters covered in Issue Specific Hearing 1 with additional matters emphasised in italics below.	
REP1-078 3.1.2	<p>These are as follows:</p> <ul style="list-style-type: none"> • Draft Development Consent Order • Offshore Ecology • Traffic and Transportation • Aviation • Agricultural Land • Flood Risk, Hydrology and Drainage • Onshore Ecology and Biodiversity Net Gain • Onshore Heritage and Archaeology • Landscape and Visual Effects • Local Business and Tourism • <i>Risk Management and Resilience</i> • <i>Human Health and Recreation</i> • Interrelationships and Cumulative Effects • <i>Mitigation Through Section 106 Contributions</i> 	<p>A number of the comments raised by Fylde Borough Council allege there is lack of information regarding timing, phasing and duration of the works and that this lack of information has affected the Council's ability to provide detailed comment on the Application. The Applicants do not consider that there is a lack of information regarding these matters and the approach that they have taken is well-precedented in other consented offshore wind projects. In order that the full impacts of the Transmission Assets have been assessed the Applicants have adopted the Rochdale Envelope approach, which ensures that the greatest level of impact is identified and has been considered. This applies not only to the works themselves but also to the timing and duration of those works, which are set out in Volume 1, Chapter 3: Project Description chapter (F1.3/F03), each Environmental Statement chapter also includes a table detailing the maximum design scenario parameters assessed for each individual impact. The Applicants have also prepared a Construction Scenarios Statement (AS-070) in response to the ExA's Rule 9 letter dated 14 February 2025 (PD-005) to provide an overview and explanation of the construction scenarios that would be authorised by the DCO together with an explanation of how these have been assessed in the Environmental Statement.</p> <p>In the respect of the phasing of construction, this has not yet been determined and will be part of detailed design and will take into account whether the Projects are constructing sequentially or concurrently. Requirement 3 of Schedules 2A and 2B of the draft Development Consent Order (C1/F04) states</p> <p><i>(2) The Project A/B onshore works and Project A/B intertidal works may not be commenced until details of the stages of the Project A/B onshore works and Project A/B intertidal works have been submitted to and approved by the relevant planning authority.</i></p> <p>Through this requirement, the Applicants are required to provide Fylde with details of the staging of the construction of the Transmission Assets which will ensure the Council has full visibility of the way the Transmission Assets will be constructed.</p>

Reference	Written Representation Comment	Applicants' response
Draft Development Consent Order		
REP1-078 4.1.1	<i>Scope of Works</i> Within the dDCO, the range of works permitted is broad and loosely defined; it is likely that any subsequent dDCO would not be an effective in securing the works in accordance with the ES.	The approach taken by the Applicants in drafting the range of works permitted follows that approved by the Secretary of State in other offshore wind development consent orders including Hornsea Two, Teesside A and B, Hornsea Three, Norfolk Vanguard, Norfolk Boreas, East Anglia One North, East Anglia Two, Hornsea Four, Awel y Môr and the recently granted Rampion 2.
REP1-078 4.1.2	For example, Pages 54 and 55 of the dDCO [APP-005] following work area 54B grants consent for a wide range of associated works which could be permanent and go beyond the scope of the assessments accompanying and prepared in support of the draft dDCO and which could go beyond the defined work areas.	Paragraph 1.4.3 of the Explanatory Memorandum (REP1-010) sets out the relevant guidance on associated development. The Applicants maintain that their use of associated development within Schedule 1 of the draft DCO (REP1-008) complies with this guidance.
REP1-078 4.1.3	Furthermore, page 54 of the dDCO relies upon the following definition for the scope of works: "(...) other works (...) which fall within the scope of the work assessed by the environmental statement"	<p>Works beyond the scope of assessments provided with the Application are not authorised by the draft DCO (REP1-008); pages 57 and 58 (formerly pages 54 and 55 of APP-05) provide a clear limitation that any associated development must "<i>fall within the scope of the work assessed by the environmental statement</i>".</p> <p>It should also be noted that the quote provided cannot be read in isolation from the words that have not been included. To do so creates a misleading impression as to the scope of works being authorised and suggests any other works are being authorised. Following the description of Work No. 54B the text reads (excised wording in bold):</p> <p>"and in connection with Work Nos. 4A to 54A and 4B to 54B and to the extent that they do not otherwise form part of any such work, further associated development comprising such other works as may be necessary or expedient for the purposes of or in connection with the relevant part of the authorised development and which fall within the scope of the work assessed by the environmental statement, including-</p>

Reference	Written Representation Comment	Applicants' response
REP1-078 4.1.4	FBC position is the dDCO should define the scope of works and the ES cannot and should not be relied upon in this regard. This reduces the clarity of what is proposed and the ability of the Interested Parties to assess the impacts, which gives rise to issues relating to the nature, timing, duration and frequency of impacts.	<p>Schedule 1 details the authorised development, which is described in Volume 1, Chapter 3: Project Description of the Environmental Statement (ES) (F1.3/F03). The use of an ES alongside the description of the authorised development in the draft DCO to define the scope of works is an approach accepted by the Secretary of State in other offshore wind farm DCOs, including their transmission works, most recently in The Rampion 2 Offshore Wind Farm Order 2025.</p> <p>The Applicants therefore maintain that the works falling within 'associated development' do not go beyond what has been assessed in the ES. The Applicants refer Fylde Borough Council to their response to Hearing Action Point ISH1_22 (see REP1-037), which explains the Applicants' use of the Rochdale Envelope, i.e. that the Environmental Statement is based on a maximum design scenario. FBC can therefore be assured that they are in a position to be able to assess the impacts of the Transmission Assets using existing documentation within the Application.</p>
REP1-068 4.1.5	This is fundamental point, in that the assessment of likely impacts arising from the proposed development, (and as set out within this LIR) are less precise, less accurate or certain with the likelihood and degree of risk and resulting harm increasing without justification.	Please refer to the Applicants response to REP1-078 paragraph 4.1.1 to 4.1.4 above.
REP1-078 4.2.1	<p><i>Timing, Duration and Frequency</i></p> <p>A recurring theme made by FBC and other interested parties relates to the fact that there are no suitable controls with regards to the timing, duration and frequency of works, including construction and decommissioning.</p>	<p>In the Applicants' response to FBC's Relevant Representation (PDA-030) paragraph RR-705.6, the impacts on land use and recreation in terms of precise timing and duration, magnitude and frequency of potential impacts were explained.</p> <p>The Applicants have prepared a Construction Scenarios Statement (AS-070) in response to the ExA's Rule 9 letter dated 14 February 2025 (PD-005) to provide an overview and explanation of the construction scenarios that would be authorised by the DCO together with an explanation of how these have been assessed in the Environmental Statement, including the potential for up to a four year gap between one project completing construction and one project commencing construction in a sequential scenario. The Applicants would also refer FBC to the Applicants response to Annex 5.2 to the</p>

Reference	Written Representation Comment	Applicants' response
		<p>Applicants response to Hearing Action Points: ISH1 6, 8, 9, 19, 26 & 28 (REP1-039) which provides further context on coordination.</p> <p>Schedules 2A & 2B of the draft DCO (C1/F04) contain specific controls with regard to timing, frequency, construction and decommissioning:</p> <ul style="list-style-type: none"> - Requirement 3 (Stages of authorised project) requires the Applicants to confirm to the relevant planning authority whether construction of the authorised project will be in one or more stages and submission of the details of these stages for approval before the onshore and intertidal works may start. It also prevents the construction from being carried out in more than one overall phase. - Requirement 8 (Code of Construction Practice) provides that no stage of the onshore works or intertidal works may commence until detailed CoCP(s) for the relevant stage of works have been submitted to and approved by the relevant planning authority (following consultation with Lancashire County Council, Natural England, the EA and the Marine Management Organisation (MMO) as appropriate). The detailed CoCP(s) must cover all the matters in the Outline Code of Construction Practice (APP-193) and its annexed outline management plans for the matters listed within the requirement. The detailed plans must be implemented as approved. - Requirement 14 (Construction hours) sets out standard construction hours for the onshore construction works and construction-related traffic movements except where otherwise specified in the Requirement. Sub-paragraph (2) specifies the type of work that can be carried out outside of the standard construction hours. Sub-paragraphs (3) to (5) deal with the specific notification requirements in relation to works. - Requirement 16 (Restoration of land used temporarily for construction) requires land used for temporary construction of the Project A or Project B onshore works and Project A or Project B intertidal works to be reinstated within 12 months following completion of the relevant stage of

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		<p>works in accordance with the details approved by the relevant planning authority.</p> <ul style="list-style-type: none"> - Requirement 22 (Onshore decommissioning) requires the submission for approval to the relevant planning authority an onshore decommissioning plan for the Project A or Project B onshore works within six months of permanent cessation of commercial operation or Project A onshore works or Project B onshore works prior to any decommissioning works taking place. The onshore decommissioning plan must be implemented as approved.
REP1-078 4.2.2	Design and the preferred programme for construction, phasing and decommissioning will have a significant bearing on the severity and longevity of impact for receptors, across all topic areas.	Please refer to the Applicants response to REP1-078 – paragraph 4.2.1 above
REP1-078 4.2.3	This includes many where such matters are critical, such as those relating to (but not limited to) impacts on agriculture, tourism, landscape, ecology and transport. Topic-specific matters are discussed primarily with reference to the ES later in this LIR.	Please refer to the Applicants response to REP1-078 paragraph 3.2.1 above.
REP1-078 4.3.1	<p><i>Construction of On Shore Trenches</i></p> <p>The phraseology of the dDCO sections describing the works to be permitted is enabling, stating in each case: “[Project] onshore cable works at [location] including [specific works]”.</p>	<p>If the DCO is made, then the Applicants as a matter of law will not be able undertake any works or to use any construction techniques which are not provided for in the DCO and as assessed in the Environmental Statement. The works descriptions at Schedule 1 of the draft DCO (REP1-008) specify which installation methods under each Work No. All construction works will remain subject to Requirement 8 as set out above. To provide further clarification the Applicants have updated the wording in Schedule 1 of the draft DCO (C1/F04) to use “consisting of” instead of “including” where applicable.</p>
REP1-078 4.3.2	This does not restrict in any way the types of works undertaken within the identified area, other than to have the objective of (in this case) laying cables. As it stands sections which state “including” where trenchless installation technique works or direct pipe works have been specified do not restrict the development to using these (or any other) method.	

Reference	Written Representation Comment	Applicants' response
REP1-078 4.3.3	No methodology statements have been provided by the applicant for critical key cross sections such as sand dunes/road-rail crossings/ditches-dykes and other sensitive locations.	The final design of onshore export cable and/or 400kV grid connection cable crossings of sensitive receptors will be undertaken at the detailed design stage, post consent; in consultation with the relevant stakeholders. Site-specific information (e.g. site investigations) and further surveys (e.g. to provide geomorphological information) will be obtained to inform the detailed design. The detailed design will reflect the complexity of the crossing method and the launch and receiving pit locations, depth of crossings and the trenchless technique. Where the crossings involve third party infrastructure (for example road and rail) they will be carried out in compliance with the protective provisions agreed with the relevant statutory undertakers as appropriate to protect their infrastructure, as set out in Schedule 10 of the draft DCO (C1/F04).
REP1-078 4.3.4	Although it is reasonable that one of the specified methods must be used, this could be satisfied by using the specified method for only a short length, with an alternative unspecified method such as open trenching used for the remaining length. In FBC's view this could and is likely to leading to harmful impacts which have been not assessed in the ES.	The Project Description Chapter of the Environmental Statement (F1.3/F03) provides explanations of Crossings and trenchless techniques the Applicants propose to use. These are secured in the Onshore Crossing Schedule (REP1-016 - REP1-017). Given the technologies, techniques and sizes of works areas involved it would be unrealistic, for the Applicants to switch construction methods within a plot allocated to works. Where necessary the works descriptions within the dDCO specify the type of cable installation to be used within that work area which cannot be changed by the Applicants for a switch to open trenching from trenchless techniques.
REP1-078 4.3.5	The likely impact is that without more specific and restrictive wording, the works could give rise to a range of harmful impact which have not been understood, assessed or appropriately mitigated.	Please refer to the Applicants response to REP1-078 4.1.1 above.
REP1-078 4.4.1	<i>Restoration</i> The dDCO does not specify restoration of land to the existing condition anywhere within the list of works. Requirement 16 in Schedules 2A and 2B is inadequate in preventing this as it only refers to land used temporarily and not defined.	Schedule 1 of the draft DCO (C1/F04), which lists the authorised works for each project, specifies in the list of further associated development for Work No.s 4A-54A and 4B-54B, the following: <i>(i) works for the benefit or protection of land affected by the authorised development;</i>

Reference	Written Representation Comment	Applicants' response
		<p>...</p> <p><i>(k) works of restoration;</i></p> <p>These works of restoration must be carried out in accordance with the requirements at Schedules 2A and 2B of the draft DCO (C1/F04). This includes Requirement 16, but also Requirement 8 (concerning provision of detailed CoCP(s) including detailed soil management plan(s) for approval, which include obligations with regards to restoration of land to its pre-construction condition).</p> <p>The Applicants consider that Requirement 16 in Schedules 2A and 2B is adequate. In particular, Requirement 16 requires reinstatement of land used for temporary construction of Project A onshore works and Project B onshore works to be reinstated within 12 months following completion of the relevant stage of works. This reinstatement must be in accordance with details approved by the relevant planning authority. These works are appropriately defined as the draft DCO (C1/F04) contains definitions of Project A onshore works and Project B onshore works respectively, which are linked to the works descriptions at Schedule 1. As set out in the Statement of Reasons (REP1-012), the Applicants will be using temporary possession where possible, for the construction of the cable route. Therefore, all land that is used temporarily and is not acquired permanently for use as onshore substations or for environmental mitigation will be reinstated in accordance with Requirement 16. Further, Article 29 requires that before giving up possession of land of which temporary possession has been taken under that article, the undertaker must remove all temporary works and restore the land to the reasonable satisfaction of the owners of the land.</p> <p>The Applicants also note Requirement 16 is well precedented in other offshore wind development consent orders, including the Sheringham and Dudgeon Offshore Wind Farm Extension Project.</p>
REP1-078 4.4.2	The likely impact is that the absence of any such requirement leads to problematic assessment about the final form of the land,	The Applicants have made a commitment (CoT22 of Volume 1, Annex 5.3: Commitments Register (F1.5.3/F03) that prior to the commencement of works, the contractor (or project appointed Land Agent) will undertake a

Reference	Written Representation Comment	Applicants' response
	particularly where permanent access and construction compounds are specified.	record of condition, (which will accompany previously captured soil condition data, identifying and describing the physical and nutrient characteristics of the existing soil profiles). Such work will inform the reinstatement under CoT08. This is secured in the DCO through Requirement 8 (Code of Construction Practice), which includes production of a Soil Management Plan in accordance with the Outline Soil Management Plan (APP-200) and Requirement 18 (Restoration of land temporarily used for construction) of the draft Development Consent Order Schedule 2A and 2B (C1/F04). The Applicants would also highlight that there are no permanent construction compounds proposed and the only new permanent accesses will be constructed as part of the Onshore Substations as outlined in Volume 1, Chapter 3: Project Description, Section 3.15.7 (F1.3/F03).
REP1-078 4.4.3	In relation to sensitive sites, FBC considers that this could lead to permanent local impacts and gives rise to specific policy conflicts and concerns.	The Applicants request that FBC further elaborate on the impacts and policy conflicts or concerns which they are alluding to.
REP1-078 4.5.1	<i>Draft Development Consent Order Summary</i> Whilst it is acknowledged that consideration will most likely be given separately to the ES and dDCO, FBC is of the opinion that a number of these matters and issues are interrelated and whilst matters can address deficiencies in control and parameters in the dDCO, The same approach cannot be applied to the ES.	The Applicants note Fylde Borough Councils comment.
Offshore Ecology		
REP1-078 5.1.1	FBC considers that matters relating to offshore environmental effects will largely be addressed by other bodies, notably Natural England and the Marine Management Organisation.	The Applicants note that Fylde Borough Council consider offshore matters to be dealt with by other statutory stakeholders.
REP1-078 5.1.2	However, on one specific issue, FBC notes that the proposed routing would run through the Fylde Marine Conservation Area and the Shell and Flat Lune Deep area, these being sensitive areas of constraint.	As detailed within Volume 1, Annex 4.2: Selection and Refinement of the Offshore Infrastructure (APP-032), Section 4.4.2, the offshore cable corridor avoids the Lune Deep and Shell Flat SAC and has been designed to only cross the Fylde MCZ at its narrowest point. Section 4.3.2 in APP-032 details

Reference	Written Representation Comment	Applicants' response
		the consideration of offshore environmental constraints and why it was not feasible to avoid the Fylde MCZ.
REP1-078 5.1.3	There is a route further to the north which avoids both areas and other sensitive areas as identified by the applicant. Without proper assessment of alternatives, the likely impact is that harm would be increased without proper justification, FBC seek further detailed explanation as to why the preferred route was chosen.	Volume 1, Annex 4.2: Selection and Refinement of the Offshore Infrastructure (APP-032) details the consideration of search areas and routing, including alternatives, that resulted in the selection of the offshore cable corridor routes for application. The Applicants have fully responded to the suggestion of an alternative connection point in REP1-039: S_D1_5.2 Annex 5.2 to the Applicants response to Hearing Action Points: ISH1 6, 8, 9, 19, 26 & 28 - Rev F0 1.
Traffic and Transportation		
REP1-078 6.1.1	FLP Policy INF1 sets out a requirement to minimise negative impacts on the quality of existing infrastructure. Furthermore, infrastructure plays a vital role in supporting business and tourism, and particularly the visitor economy.	The Applicants refer the Council to Table 7.3 of Volume 3: Chapter 7 Traffic and Transport (APP-108) of the ES which includes a detailed policy review (including INF1) demonstrating how the policy is considered as part of the ES.
REP1-078 6.1.2	FBC relies upon Lancashire County Council as Highway Authority for matters relating to traffic and transport effects and has liaised with the Highway Authority in preparation of our LIR. FBC understands that the Highway Authority will provide detailed comments at Deadline 1 and has reviewed a draft version of these comments.	This is noted. The Applicants are working proactively with Lancashire County Council to address their comments.
REP1-078 6.1.3	Consistent with all other topic areas, the key issue relates to the ES, its supporting documents and its deficiencies. There is a lack of evidence to support the suitability of much of the proposed route(s), and to demonstrate that the proposals are safe and highways matters can be dealt with.	<p>The Applicant's assessment has been informed by the Planning Inspectorate's Scoping Opinion (APP-230) and the consultation with statutory stakeholders via the evidence plan process (EPP) and statutory consultation on the PEIR. The EPP established a traffic and transport expert working group (EWG) and the invitee list included Fylde Borough Council. As confirmed in ES Volume 3, Chapter 7: Traffic and Transport, Table 7.4 (APP-108) the T&T EWG met three times to inform the DCO submission.</p> <p>Volume 3, Chapter 7: Traffic and Transport of the Environmental Statement (APP-108) contains an assessment of the potential impacts from the Project on traffic and transport receptors. To inform the assessment, the Applicants</p>

Reference	Written Representation Comment	Applicants' response
		have undertaken a comprehensive data collection exercise including capturing of baseline traffic flows, speeds, identification of sensitive receptors and collisions for all highway links within Blackpool Council, Lancashire County Council and National Highways administration areas. In total, data for 91 highway links have been collected covering over 155 km of highway network. The assessment has considered the potential impacts of the Project in relation to driver delay, severance, non-motorised user delay, fear and intimidation, road safety and abnormal loads. The assessment concludes (with the application of mitigation measures) that the residual effects would not be significant in Environmental Impact Assessment (EIA) terms.
REP1-078 6.1.4	The lack of detail around the timing, phasing duration and frequency of closures and diversions means that the potential impacts cannot be properly understood and assessed.	To mitigate the impact of road closures and diversions, the Applicants would highlight that significant commitments have been made to the use of trenchless installation techniques, such as Horizontal Directional Drilling (HDD) to minimise disruption to users of 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 (C1/F04).
REP1-078 6.1.5	In terms of impacts on highways, this has the potential to have very broad impacts. With reference to risk, closures impact upon emergency access, whether in terms of access to utilities or the movement of vehicles. Businesses will be impacted in terms of movement of goods, staff and customers. Residents will be impacted, particularly given that some proposed closures would sever access to some dwellings, for example at Leach Lane and The Hamlet.	<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. Access to residential dwellings at Leach Lane and the Hamlet would be maintained throughout the construction of the Project.</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 (C1/F04).</p>

Reference	Written Representation Comment	Applicants' response
REP1-078 6.1.6	Cycle routes would also be impacted, including the Guild Wheel which is a major cycle infrastructure route connecting to key routes within Fylde, supporting commuting, the environment, health and tourism activities.	The Applicants are in discussion on this matter with Lancashire County Council and have identified the requirement for measures to manage the potential for interaction between construction traffic and users of the Guild Wheel where it crosses the main A583 on an over bridge. The Applicants are discussing updates to the Outline Construction Traffic Management Plan (OCTMP) (APP-211) to ensure that vehicle movements across this bridge are safely managed. The updated Outline Construction Traffic Management Plan (OCTMP) submitted at Deadline 2 (J5/F02).
REP1-078 6.1.7	Similarly, the development would impact upon 21 Public Rights of Way (PROWS) within Fylde. These impacts are discussed in more detail in the 'Human Health and Recreation' section later in this LIR. In summary, lack of details about the timing, phasing, duration, frequency and nature of the closures and diversions mean that the impacts cannot be properly assessed and managed.	The Applicants refer to REP1-078 15.1 to 15.6.3 below which covers Human Health and Recreation.
REP1-078 6.1.8	The use of more sustainable travel options such as cycling and walking rely upon the availability, safety and reliability of these options, in encouraging people to limit car use. Improper managed diversions and closures will dissuade people from using these more sustainable transport options.	Please refer to the Applicants to response REP1-078 6.1.4 above.
REP1-078 6.1.9	The likelihood is, without proper baseline analysis and subsequent analysis and formulation of mitigation and management, the negative impacts on existing infrastructure could not be properly minimised. No justification for this approach is presented.	Please refer to the Applicants response to REP1-078 6.1.3 above.
Aviation		
REP1-078 7.1.1	Aviation plays a significant role in Fylde, with Blackpool Airport and Warton Aerodrome both being strategic infrastructure of regional and national importance. Whilst matters relating to the business impacts of the proposals as they affect these sites are	The Applicants note this response.

Reference	Written Representation Comment	Applicants' response
	dealt with under the 'Business and Tourism' heading of this LIR, this section considers other matters.	
REP1-078 7.1.2	FLP Strategic Policies EC4 and T2 and set out requirements and limitations for development, with specific reference to aviation. Policy T2 includes a specific restriction that development would not be permitted unless it could be demonstrated that there would not be any potential for adverse impacts on aviation operations, or on defence navigation systems and communications.	<p>Policy T2 relates to Warton Aerodrome.</p> <p>Warton Aerodrome has been scoped out, as discussed within Table 11.4 of Volume 3, Chapter 11: Aviation and radar (APP-130), due to the Transmission Assets Onshore Order Limits lying beyond the Communication, Navigation and Surveillance (CNS) and safeguarded area of BAE Systems Warton Aerodrome. Additionally, the Onshore Order Limits and Intertidal Infrastructure Area lie below the Warton Aerodrome Obstacle Limitation Surface (OLS) Inner Horizontal Surface, the construction equipment and remaining above surface infrastructure will also not penetrate the surface ceiling. It is not anticipated that there will be any adverse impacts on aviation operations, or on defence navigation systems and communications.</p> <p>The Applicants have been in dialogue with BAE Systems and will proactively assist in the provision of information / data should BAE Systems wish to undertake its own assessment and consider that this can be resolved alongside the Examination. For further information, see sections 11.8 and 11.11 of Volume 3, Chapter 11: Aviation and radar (APP-130)</p>
REP1-078 7.1.3	The proposed development includes works within the Blackpool Airport Enterprise Zone, as well as ecological mitigation works within the 13km buffer zone around Warton Aerodrome.	The Applicants note this response.
REP1-078 7.1.4	These elements of the proposals are relevant because they have the potential to give rise to harmful impacts. For the airport, this is in terms of affecting operations, including direct impact on a runway. For the aerodrome, this includes ecological mitigation works which have the potential to alter and increase bird activity, potentially giving rise to increased bird strike risk.	The Applicants are engaging with Blackpool Airport and BAE regarding the ecological mitigation areas and their concerns relating to bird strike risk. As part of these discussions, the Applicants have prepared a document setting out its strategy for preparing a wildlife hazard management plan (S_D2_14).

Reference	Written Representation Comment	Applicants' response
REP1-078 7.1.5	These matters (with others) were discussed by representatives of both organisations during the Preliminary Hearing and Specific Issue 1 Hearing. In both instances, this included raising concerns about there being insufficient detail in the ES to properly assess the impacts.	The Applicants' position is that the assessment within the ES is robust. Engagement is ongoing with Blackpool Airport and BAE with regards to the ecological mitigation areas.
REP1-078 7.1.6	The likely impact is that there is the potential for harm to aviation activities at both sites and therefore conflict with FLP Strategic Policies EC4 and T2.	The Applicants' position is that the Transmission Assets will not lead to potential harm to aviation activities and consequently, there is no conflict with FLP Strategic Policies EC4 and T2.
Agricultural Land		
REP1-078 8.1.1	The main land use in Fylde, in terms of land area, is agriculture. This is due to the significant areas of Grade 2 (which is very good quality land) and Grade 3a agricultural land (which is good quality land). Fylde has no areas of Grade 1 agricultural land, but around 50% of the Borough is classified as Grade 2, and a further 34% as Grade 3a (FLP Section 2.2).	The Applicants note the reference to FLP, although the source of the figure quoted for 34% of the Borough as Subgrade 3a is not referenced, as the available published information for ALC does not provide a split of Subgrades 3a and 3b. The published Ministry of Agriculture Fisheries and Food dataset identifies that the total of all Grade 3 land is 34% in the district and that would include Subgrade 3a and 3b land. Published information on ALC for Transmissions Assets has been included in ES Volume 3: Annex 6.1: Published agricultural and soils data (APP-105).
REP1-078 8.1.2	The use of this land supports extensive agriculturally based supply chains, principally associated with small and medium sized farm holdings and agriculture-based enterprises.	The nature of farm holdings and the assessment of the effects on farm holdings is assessed in ES Volume 3, Chapter 6: Land Use and Recreation (APP-104) Baseline information on the nature of the farm holdings is provided in Section 6.6.2 of the chapter. The assessment of the temporary effects on farm holdings is assessed in Section 6.11.3 and concludes at paragraph 6.11.3.24 that there would be a moderate adverse significant effect on farm holdings during the construction of Transmission Assets as a result of potential disruption to agricultural activities during cable installation works.
REP1-078 8.1.3	FLP Strategic Policy DLF1 sets out that development will not be permitted which would prevent or undermine the operation of existing land uses.	The Applicants note the comment.

Reference	Written Representation Comment	Applicants' response
REP1-078 8.1.4	More specifically, FLP Policy CL3 does not support renewable energy development on Grades 1, 2 and 3 agricultural land, with the exception that "it is demonstrated that poorer quality land could not be used instead, and that the benefits of the development outweigh the economic and other benefits of the best and most versatile agricultural land and any other adverse impacts of the proposal".	Policy CL3 states that the development "would not be sited on the best and most versatile agricultural land (grades 1,2 and 3a) rather than Grades 1,2 and 3." The Transmission Assets would permanently lead to the loss of the lowest quality of land Subgrade 3a land within the category of "best and most versatile" land as assessed in ES Volume 3, Chapter 6: Land Use and Recreation (APP-104). The Applicants refer Fylde Borough Council to Annex 5.2 to the Applicants response to REP1-078 17.1.1 below which summarises the benefits of the Project. Further detail can be found in the Statement of Reasons (REP1-012).
REP1-078 8.1.5	The applicant has indicated that a 'Black Red Amber Green' [BRAG] assessment has been used to assess and minimise impacts in relation to several constraints, including land classification.	Volume 1, Annex 4.3: Selection and Refinement of Onshore Infrastructure (AS-028), Tables 4.14 and Table 4.18 detail the BRAG criteria for the onshore export cable corridor and 400kV grid connection cable corridor. The Applicants can confirm that as shown in the tables, Grade 2 agricultural land is an amber rating whereas Grade 3 agricultural land is a green rating and therefore are not given the same weighting. The Applicants therefore consider the BRAG assessment for the onshore export cable corridor and 400kV grid connection cable corridor to be a balanced and justified assessment.
REP1-078 8.1.6	However, FBC considers that this is inappropriate, as the assessment presented in the Selection and Refinement of the Onshore Infrastructure [APP-033] gives the same weight to harm arising from developing on both Grade 2 and Grade 3 agricultural land.	
REP1-078 8.1.7	It is reasonable to assume as a starting point, a route(s) could run across a greater proportion of Grade 3 land, thereby reducing impact on better quality Grade 2 land by using poorer quality land instead. A balanced and justified assessment on this basis has not been considered or assessed.	

Reference	Written Representation Comment	Applicants' response
REP1-078 8.1.8	The likely impact and degree of impact arising from temporary or permanent loss of high- quality agricultural land as proposed will increase with no reasonable alternative assessment.	The assessment of alternatives in ES Volume 4.3, Annex 1: Selection and Refinement of Onshore Infrastructure (AS-028) includes the consideration of the best and most versatile Grades 1, 2 and Subgrade 3a land. The effects of the loss of high quality best and most versatile agricultural land is assessed in Section 6.11.2 of ES Volume 3: Chapter 6 (APP-104). The assessment of the effects in Section 6.11. 2 of the chapter concludes that the permanent loss of land associated with the construction of the onshore substations and link boxes (assuming that these are all located in the best and most versatile agricultural land) is assessed at paragraph 6.11.2.13 to be of permanent major adverse significance, which is significant in EIA terms.
REP1-078 8.1.9	Proposals include the temporary loss of agricultural land to facilitate the buildout, although the timing, duration and frequency are not specified. The absence of proper phasing information does not enable a proper assessment of the impacts to be carried out.	<p>The Applicants refer Fylde Borough Council to REP1-078 3.2.1 which addresses the points raised regarding timing, duration, frequency and phasing.</p> <p>The effects of the duration of the works on farm holdings is assessed in Section 6.11.3 of ES Volume 3, Chapter 6: Land Use and Recreation (APP-104) and is based on the potential sequential construction scenario as identified in Table 6.18 of that chapter.</p> <p>With regard to the quality of agricultural land, the Outline Soil Management Plan (APP-200) comprises measures, based on recognised best practice measures to ensure that soils that are temporarily disturbed through the construction of Transmission Assets can be appropriately reinstated and land returned to its former agricultural use. The timing and duration of the works does not affect the ability of the measures to be successfully implemented.</p>
REP1-078 8.1.10	Specifically, Page 35, ES Volume 4 Chapter 2 on Socio-Economics [APP-141] defers all assessment of potential impacts on agricultural land to ES Volume 3 Chapter 6 on Land Use and Recreation [APP-104]. This in turn summarises the impacts in Table 6.25, identifying agricultural land as having an “up to high” sensitivity but only categorising the “temporary loss” as having a	In Table 6.25 of Chapter 6: Land Use and Recreation (APP-104), a negligible impact on farm holdings is assessed in relation to decommissioning activities, where minimal works would be undertaken. Paragraph 6.11.3.26 describes the limited activities that would be undertaken during this phase as follows: “it is expected that onshore export cables and 400kV cables will be left in situ or removed via link boxes to minimise environmental disturbance

Reference	Written Representation Comment	Applicants' response
	negligible impact, based on a scope at 6.11.2.4 of "more than five years" but without limit.	<p>during decommissioning. Joint bays and link boxes will be removed only if it is feasible to return the land to its current agricultural use".</p> <p>During the construction phase of Transmission Assets, the temporary impact on farm holdings is summarised as being "medium", having assessed farm holdings of up to a high level of sensitivity, paragraph 6.11.3.24 identifies a temporary moderate adverse effect on farm holdings during construction, which is significant in EIA terms.</p>
REP1-078 8.1.11	This defers mitigation to commitments CoT35 and CoT81, to the Outline Code of Construction Practice [APP-193] and Outline Soil Management Plan [APP-200] respectively. With each of these then deferring any control to work to be completed at a later date, with the former including a commitment at 1.7.5.1 to "maintain the quality of agricultural land and land holdings" and responsibility passed to principal contractors.	<p>The Roles and Responsibilities are set out in Section 1/4 of the Outline Code of Construction Practice (CoCP) (APP-193). The Outline Soil Management Plan (APP-200) forms an appendix of the outline CoCP (APP-193). This is secured in the DCO through Requirement 8 (Code of Construction Practice), which includes production of a detailed Soil Management Plan(s) in accordance with the Outline Soil Management Plan (APP-200) of the draft Development Consent Order Schedule 2A and 2B (C1/F04).</p> <p>The responsibility to deliver the detailed plan(s) will rest with the Principal Contractor(s) and ultimately the Applicant(s), but also with the appointed agricultural liaison officer (ALO).</p>
REP1-078 8.1.12	FBC considers that in order to maintain the quality of agricultural land, land holdings and their use, details must include the nature, timing, duration and frequency of impacts to the land/location in question.	<p>The Applicants refer Fylde Borough Council to REP1-078 3.2.1 which addresses the points raised regarding timing, duration, frequency and phasing.</p> <p>With regard to the quality of agricultural land, the Outline Soil Management Plan (APP-200) comprises measures, based on recognised best practice measures to ensure that soils that are temporarily disturbed through the construction of Transmission Assets can be appropriately reinstated and land returned to its former agricultural use. The timing and duration of the works does not affect the ability of the measures to be successfully implemented and therefore the quality of the land to be maintained where it is temporarily affected.</p> <p>The effects of the duration of the works on farm holdings is assessed in Section 6.11.3 of ES Volume 3, Chapter 6: Land Use and Recreation (APP-</p>

Reference	Written Representation Comment	Applicants' response
		<p>104) and is based on the potential sequential construction scenario as identified in Table 6.18 of that chapter. The Applicants have also prepared a Construction Scenarios Statement (AS-070) in response to the ExA's Rule 9 letter dated 14 February 2025 (PD-005) to provide an overview and explanation of the construction scenarios that would be authorised by the DCO together with an explanation of how these have been assessed in the Environmental Statement, including the potential for up to a four year gap between one project completing construction and one project commencing construction in a sequential scenario.</p> <p>Baseline information on the nature of the farm holdings is provided in Section 6.6.2 of the chapter. The assessment of the temporary effects on farm holdings is assessed in Section 6.11.3 and concludes at paragraph 6.11.3.24 that there would be a moderate adverse significant effect on farm holdings during the construction of Transmission Assets.</p>
REP1-078 8.1.13	There are also a significant seasonality matters which have also not been assessed. Allowing for an open-ended period of works exceeding five years should not be considered to have negligible impacts.	<p>The Outline Soil Management Plan (APP-J1.5) includes measures for the control of soil handling conditions throughout the year at Section 1.7.5. based on ground and weather conditions and appropriate soil moisture and consistency checks as identified in the best practice documents, Construction Code of Practice (DEFRA 2009) and the supplementary Note 4 – Soil Wetness of the Good Practice Guide for Handling Soils (IoQ 2021). These measures would enable the appropriate control of soil handling throughout the year and accounting for different seasonal conditions. The length of the construction phase does not affect the successful implementation of the measures identified within the outline management plan to reinstate the land to its former agricultural use following construction.</p>
REP1-078 8.1.14	In FBC's view the ES does not include proper consideration of operation and decommissioning which would likely give rise to temporary impacts on agricultural land. Therefore, the impact cannot be properly understood and the likely impacts and harm to local agricultural businesses and supply chains would be increased. Extended and repeated periods of impact would cause	<p>ES Volume 3, Chapter 6: Land Use and Recreation (APP-104) Table 6.4 contains the responses from the Planning Inspectorate on the Scoping Report submitted and the proposed matters to be scoped out of the assessment. In relation to the impacts on land during operation and maintenance, the Planning Inspectorate "agrees that disruption and reduced access to agricultural land during operation and maintenance can be scoped</p>

Reference	Written Representation Comment	Applicants' response
	permanent closure of some businesses, where this harm could otherwise be reduced and closure avoided.	out of the ES". This is because during operation there would not be an temporary impacts on agricultural land. The effects of Transmission Assets during decommissioning on agricultural land are assessed in the Chapter at Section 6.11.
REP1-078 8.1.15	The proposed development also includes other permanent impacts on agricultural land, notably relating to the substations and ancillary development but also in terms of the junction boxes.	The permanent loss of land arising from the onshore substations and link boxes is assessed in ES Volume 3, Chapter 6: Land Use (APP-104) and Recreation Section 6.11. The permanent loss of agricultural land is assessed in Section 6.11.2 and includes approximately 25.7ha of permanent land take at the onshore substations and a further 0.1ha of land in total due to the link boxes. The joint bays are located underground and therefore would not permanently affect the quality or use of the agricultural land. Section 6.11.2.13 concludes that the loss of approximately 22.1ha of best of most versatile land within the areas of land permanently affected would be of major adverse significance, which is significant in EIA terms.
REP1-078 8.1.16	The total land coverage of both substations is extensive; there is no clear justification provided in the ES for the need to have two separate substations. The likely impact is a greater amount of agricultural land would be lost without justification.	The Applicants refer Fylde Borough Council to Annex 5.2 to the Applicants response to Hearing Action Points: ISH1 6, 8, 9, 19, 26 & 28 (REP1-039), which provides clarity on the need for two onshore substations as the projects must be electrically independent.
REP1-078 8.1.17	With regard to junction boxes, the details of the size, number and general location of the junction boxes have not been provided. This contributes to overall uncertainty around the potential impacts and makes it harder for agricultural businesses to plan and mitigate impacts arising from the development.	The exact location of the link boxes will be subject to detailed project design pre-construction. However, where possible, during this detailed design process, consideration will be given to locating the link boxes within non-agricultural land or on the boundaries of agricultural land where possible to reduce the loss of land and disruption to farming operations.
REP1-078 8.1.18	The likely impact is that the harm arising from the loss of land to the junction boxes, although likely to be small in area and spread out, it will nevertheless be increased.	Please refer to the Applicants response to REP1-078 – paragraph 8.1.15 and 8.1.17 above.
REP1-078 8.1.19	With regards to the above impacts on agricultural land, each of these impacts will affect compliance with Policies EN-1, EN-3 and FLP CL3 because they are likely to increase the magnitude of the	The Applicants have undertaken a rigorous and robust route planning and site selection process. The Applicants have set out their approach to onshore export cable corridor routing within Volume 1, Chapter 4: Site

Reference	Written Representation Comment	Applicants' response
	harmful impacts as assessed when against the benefits of the development.	<p>Selection and Consideration of Alternatives (AS-26) and its supporting annexes. Section 4.3 of Volume 1, Annex 4.3: Selection and Refinement of the Onshore Infrastructure (AS-028) states directly having the most direct route was one of the guiding principles that guided the onshore infrastructure selection and refinement process, specifically the onshore export cable. The Applicants confirm that where possible the design of the projects has sought to avoid or minimise impacts to agricultural land.</p> <p>Please refer to the Applicants response to REP1-078 – paragraph 8.1.15 and 8.1.17 above.</p> <p>NPS EN-1 Paragraph 4.1.7 states: <i>“For projects which qualify as CNP Infrastructure, it is likely that the need case will outweigh the residual effects in all but the most exceptional cases. This presumption, however, does not apply to residual impacts which present an unacceptable risk to, or interference with, human health and public safety, defence, irreplaceable habitats or unacceptable risk to the achievement of net zero. Further, the same exception applies to this presumption for residual impacts which present an unacceptable risk to, or unacceptable interference offshore to navigation, or onshore to flood and coastal erosion risk.”</i></p> <p>Whilst the loss of 22.1 ha of Best and Most Versatile Land is considered to be significant in EIA terms, the Transmission Assets benefits from the presumption in favour of consent, applying to CNP infrastructure and this presumption is unaffected by the predicted impacts on agricultural land.</p>
REP1-078 8.1.20	The lack of information regarding timing, phasing, methodology, duration, frequency and nature of these impacts is problematic. The applicant has not set out any details of proposed beneficial impacts on agricultural land as it is not anticipated that there would be any beneficial impacts to agricultural land arising from the development.	<p>The Applicants refer Fylde Borough Council to REP1-078 3.2.1 which addresses the points raised regarding timing, duration, frequency and phasing.</p> <p>Transmission Assets would lead to the permanent loss of agricultural land associated with the onshore substations and link boxes and therefore only adverse effects on agricultural land are assessed. No beneficial impacts are identified within the assessment in regards to agricultural land however, the Applicants refer Fylde Borough Council to the response provided to REP1-078 8.1.20 which provides details on the benefits of the Project.</p>

Reference	Written Representation Comment	Applicants' response
Flood Risk, Hydrology and Drainage		
REP1-078 9.1.1	FLP Strategic Policy CL1 sets out a requirement for all development to minimise flood risk impacts on the environment, to retain water quality and efficiency and to mitigate against the likely effects of climate change on future generations. At a high level FBC recognises the role that low carbon and renewable energy can play in mitigating the likely effects of climate change.	This policy is considered within the Flood Risk Assessment (Volume 3, Annex 2.3: Flood Risk Assessment (parts 1, 2 and 3) [REP1-022] [REP1-023] and [REP1-024]).
REP1-078 9.1.2	With regards to water management matters, FBC relies upon Lancashire County Council as Lead Local Flood Authority, as well as other statutory bodies, and notes the submissions made so far in this capacity. However, there are a number of important matters to note and highlight.	Noted. The Applicants are working proactively with Lancashire County Council as the Lead Local Flood Authority to address their comments.
REP1-078 9.1.3	Firstly Fylde is a coastal area, the Fylde Coast Authorities Level 1 Strategic Flood Risk Assessment (SFRA) 2024 [SFRA] setting out that the entire coastline to be at tidal flood risk. Specifically, the dunes area provides flood defence for a section of the coastline, with capital funding from the Environment Agency to maintain and accrete them.	The Applicants refer Fylde Borough Council to the Applicants response to RR-704.9.1 (PDA-006) where a detailed response with regard to sand dune flood defences is set out.
REP1-078 9.1.4	FBC is concerned that the proposed works in the dunes area may harm the effectiveness of the dunes and flood defence and considers that the lack of detail about the works in this area means that the potential impacts cannot be properly understood and assessed. The likely impact is that the risk of flooding will be increased and that use of resources (both in terms of funding and activities) will be made less efficient.	The Applicants refer Fylde Borough Council to the Applicants response to RR-704.9.1 (PDA-006) where they have provided a detailed response with regard to sand dune flood defences.
REP1-078 9.1.5	Also areas of Fylde are susceptible to ground and surface water flooding, with some ground types being relied upon to hold significant amounts of water. The lack of specific details around the nature, timing, duration and frequency of works, as well as	The Applicants have set out the operational drainage arrangements for the substations within the Outline Operational Drainage Management Plan (APP- 215). Paragraph 1.4.2.8 states that the most suitable discharge method and location for surface water from the onshore substation sites is to the Dow Brook, which is a 'Main River' close to the sites.

Reference	Written Representation Comment	Applicants' response
	details around built infrastructure, means impacts on surface water management cannot be properly understood and assessed.	<p>With regard to the onshore export cable corridor, during operation the cable is buried and as such does not require drainage to be installed. Drainage arrangements during the construction phase of the onshore export cable corridor, 400kV grid connection cable corridor and substations is set out within the Outline Surface and Groundwater Management Plan (APP-202). Section 1.3.2 of APP 202 includes the following measures;</p> <ul style="list-style-type: none"> • Where required, the installation of pre- and post-construction drainage either side of the onshore export cable corridor and 400kV grid connection cable corridor to ensure existing land drainage flow is maintained. Interceptor drains will be installed where the haul road crosses water courses or public highways. • The installation of drains/ditches around temporary construction compounds and the onshore substation sites to intercept surface water runoff and divert it around the working areas where required. • Where practicable, silt fences (or equivalent) will be used to intercept overland flow and prevent sediment from being carried to ditches and streams. • Temporary drainage channels will be kept free from debris and other material through maintenance of a clean and tidy site. • Surface water from the cable trenches during the construction period will be pumped via settling tanks or ponds to remove sediment and potential contaminants. • Where practicable, cleaning of the wheels of vehicles leaving site to prevent the accumulation of soil and sediment on road surfaces. • In locations where large areas of exposed ground lie adjacent to watercourses, buffer strips of vegetation will be retained, where possible, to prevent runoff • The rate of discharge to any watercourse of construction site water runoff would be no greater than a controlled rate agreed in advance with the Lead Local Flood Authority (LLFA) and appropriate measures will be taken to dissipate the flow energy at the temporary outfall to prevent erosion of the

Reference	Written Representation Comment	Applicants' response
		<p>bed and banks of the receiving water body (e.g., correct orientation of the outfall and the use of baffle pads).</p> <ul style="list-style-type: none"> • Sustainable Drainage Systems (SuDS) will be used, where practicable, to ensure no increase in surface water runoff rates or volumes from the temporary construction compounds to surrounding land drainage ditches and to manage surface water flood risk. The installation of SuDS will follow guidance set out within the SuDS Manual (CIRIA, 2015). Subject to consent and in consultation with the Environment Agency, the SuDS will discharge to the local watercourses, ditches or to ground within the site boundaries. <p>The Applicants have made a commitment (CoT11 of Volume 1, Annex 5.3: Commitments Register of the ES (F 1.5.3/F03)) to develop Detailed Operational Drainage Management Plan(s) in accordance with the Outline Operational Drainage Management Plan. This is secured by Requirement 20 within Schedules 2A & 2B of the draft Development Consent Order (C1/F04).</p> <p>Under Requirement 8 of Schedules 2A and 2B of the draft DCO (C1/F04), the Applicants must prepare detailed Surface and Groundwater Management Plan(s) in accordance with the Outline Surface and Groundwater Management Plan (APP-202), which forms part of the Outline Code of Construction Practice (CoCP) (APP-193). These detailed plans will be agreed with the relevant authorities.</p>
REP1-078 9.1.6	NPPF supports a risk-based and sequential approach to development and flood risk, so that development is in the lowest flood risk areas where possible. The lack of sufficient detail and justification in the applicants' ES means it is not possible to assess whether the development would minimise flood risk impacts.	<p>Details regarding the Sequential Test and the Exception Test for the Transmission Assets are provided within section 1.9.2. and 1.9.3. of the Flood Risk Assessment (Volume 3, Annex 2.3: Flood Risk Assessment (parts 1, 2 and 3) (REP1-022) (REP1-023) and (REP1-024)).</p> <p>The landfall, onshore export cable corridor and 400 kV grid connection cable corridors are required to connect to the national grid at Penwortham and there are no reasonably available routes for cables without crossing areas of Flood Zone 3 (including Flood Zones 3a and 3b).</p> <p>The exception test demonstrates the project will provide wider sustainability benefits that outweigh any flood risk and the development will be safe for the development lifetime, taking into consideration the vulnerability of its users.</p>

Reference	Written Representation Comment	Applicants' response
		The Applicants have provided several commitments to minimise flood risk impacts, which includes the Outline CoCP which includes flood protection and control measures (CoT35 of Volume 1, Annex 5.3: Commitments Register of the ES (F 1.5.3/F03). This is secured by Requirement 8 within Schedules 2A & 2B of the draft Development Consent Order (C1/F04).
Onshore Ecology and Biodiversity Net Gain		
REP1-078 10.1.1	<p><i>Introduction</i></p> <p>The principal concern in respect of biodiversity is the scheme will result in the loss and disturbance of habitats, including those of national and international importance. The loss of habitats has the potential to result in the loss of or disturbance of breeding, sheltering, hibernating, foraging, commuting and dispersal habitats of priority or protected species. Lancashire County Council and Natural England have provided a comprehensive response to the proposals, which FBC fully supports and further comments on specific issues are provided below.</p>	The Applicants note the response.
REP1-078 10.2.1	<p><i>Coastal Management Area and SSSI</i></p> <p>The development would affect the area of sand dunes to the east and west of Clifton Drive North, these fall within the Coastal Change Management Area defined by FLP Policy ENV1. This policy, along with NPPF paragraph 185, set out that development within Coastal Change Management Areas will only be appropriate where it would not have unacceptable impact upon coastal change.</p>	The Applicants note the response. Please see Planning Statement Addendum (S_D2_9) for commentary.
REP1-078 10.3.1	<p><i>Sand Dunes</i></p> <p>The dunes are designated as the Lytham St Anne's Dunes SSSI. The protection of the dunes habitat is supported by projects undertaken by the Council's Ranger Service, which has been partially funded by Section 106 contributions from new housing</p>	The Applicants note the response.

Reference	Written Representation Comment	Applicants' response
	development immediately to the north at the former Pontins site, as well as other capital funding.	
REP1-078 10.3.2	The proposed development includes underground construction. However, the proposals do not include sufficient detail to assess whether this could be achieved without damage and disturbance to the site.	<p>The Applicants refer Fylde Borough Council to REP1-078 3.2.1 which addresses the points raised regarding timing, duration, frequency and phasing.</p> <p>The Applicants refer Fylde Borough Council to Volume 1, Chapter 3 (AS-024) and Annex 5.3 to the Applicants response to Hearing Action Points: ISH1 13, 14, 16, 17 (REP1-040) which provides further detail on the trenchless technique crossing of the sand dunes.</p> <p>The Applicants confirm reiterate that there would be no direct impacts to the sand dune habitats or sand lizard population at Lytham St Anne's SSSI, LNR, BHS and GHS as a result of the construction of the project, because the dunes will be crossed using trenchless technology. Notwithstanding this, the concerns of stakeholders including the Local Planning Authorities, Wildlife Trust and Natural England regarding the potential for hydrological impacts to the dune slacks have been noted throughout the consultation process, and work is ongoing to resolve these outstanding concerns through the provision of more information.</p> <p>The Applicants also confirm that The Applicants also confirm that the impacts of changes in groundwater levels on groundwater dependant sites have been assessed in Volume 3, Chapter 1: Geology, hydrogeology and ground conditions (APP-068), The assessment concluded that the residual effect is non-significant, It is also reiterated that CoT41 (hydrological risk assessments), CoT119 (hydrological risk assessment of St Annes Old Links Golf Club) and CoT128 (hydrological risk assessment of Lytham St Annes Dunes) confirm that ground investigation and a hydrogeological risk assessment will be undertaken for the Lytham St Annes sand dunes complex post consent as part of detailed design for the project. The assessments will confirm detailed design parameters, including cable burial depth beneath the dunes, to avoid any adverse effects on hydrologically dependent surface water features of the sand dune systems.</p>

Reference	Written Representation Comment	Applicants' response
REP1-078 10.3.3	FLP Policy ENV1 prevents development within the area, unless seven criteria are all met. These proposals fail to meet six of the seven criteria, only meeting requirement 'i' which relates to the exceptional need for a coastal location. The policy goes on to state that where development does occur, contributions will be sought for conservation, management and enhancement of important wildlife habitats and the creation of new habitats.	The Applicants' position is that sufficient habitat creation and enhancement has been provided for the predicted impacts of the project, the majority of which are temporary and reversible.
REP1-078 10.3.4	FLP Policy ENV2 states that where significant harm resulting from development affecting nature conservation sites cannot be avoided, adequately mitigated and or replaced or compensated, then planning permission will be refused.	The Applicants note the response. The Applicants' position is that adequate mitigation has been provided for the predicted impacts as reported in Volume 3, Chapter 3: Onshore ecology and nature conservation (APP-075).
REP1-078 10.3.5	Construction methods may provide significant mitigation if they can be adequately secured. However, this is not achieved through the dDCO as drafted.	The Applicants refer Fylde Borough Council to the Applicants response to REP1-078 point 4.2.1 which provides details of the management plans and how they are secured within the draft DCO (REP1-008) The Applicants have made a commitment (CoT02 of Volume 1, Annex 5.3: Commitments Register of the ES (F 1.5.3/F03)) to cross a number of sensitive receptors using trenchless techniques in order to avoid direct impacts on sensitive surface features (such as the sand dunes), as set out in the Onshore Crossing Schedule (REP1-016 and REP1-018). This is secured by Requirement 5(2) and 8 within Schedules 2A & 2B of the draft Development Consent Order (C1/F04).
REP1-078 10.3.6	Overall, any complete programme of measures should include significant contributions to allow the Council's Ranger Service to support mitigation measures over the longer term, if compliance with Policy ENV2 is to be achieved. In FBC view the ES does not contain specific detail to understand the likely impacts of the development upon the dunes.	The Applicants refer FBC to REP1078-10.3.2 which confirms that there will be no potential impact to the dunes at Lytham St Annes as a result of the Transmission Assets.
REP1-078 10.3.7	Whilst this issue is a recurring theme throughout this LIR, it is of relevance here because the sand dunes are an extremely	

Reference	Written Representation Comment	Applicants' response
	sensitive habitat and extremely vulnerable to disturbance and even more so to repeat disturbance.	
REP1-078 10.4.1	<i>Sand Lizards</i> A population of sand lizard occurs within the Order limits on dune habitat of the Ribble Estuary SSSI and Lytham St. Anne's Dunes SSSI. The applicants propose the installation of the export cables at Lytham St Annes Dunes SSSI will be undertaken using a direct pipe trenchless technique to pass cables beneath the foredune habitat in the Ribble Estuary SSSI. The Environmental Statement states that this area supports the majority of the sand lizard population.	The Applicants note this response.
REP1-078 10.4.2	Whilst the applicants acknowledge the potential for disturbance, as set out at the Relevant Representations stage, FBC considers the assessment carried out by the applicants is not up- to-date and regardless the likely impact of the development as presented is there is potential for significant harm to this protected species with no justification, protection or mitigation.	<p>The Applicants note this response.</p> <p>The Applicants' position is that sufficient baseline data were presented within the Environmental Statement to inform the impact assessment. Data on amphibians and reptiles within the sand dunes was helpfully provided by the Fylde Sand Dunes project to inform the ecological baseline, particularly in relation to the sand lizard population, which is well monitored at this location since their introduction took place. Baseline data from 2022 and 2023 was provided, which is considered sufficiently up-to-date for impact assessment purposes in accordance with industry guidance.</p> <p>The habitat mapping of the sand dunes that informed the impact assessment was primarily informed by the 2016 NVC survey undertaken by a botanical specialist, with a ground truthing botanical NVC survey undertaken in summer 2024. The botanical data is therefore considered sufficiently up-to-date for impact assessment purposes in accordance with industry guidance.</p>
REP1-078 10.5.1	<i>St Annes Old Links Golf Course</i> The St Annes Old Links Golf Course is locally designated (by Lancashire County Council) for biodiversity importance and as a "Biological Heritage Site" under Policy ENV2.	The Applicants note this response. The St Anne's Old Links Golf Course BHS designation is identified in the Environmental Statement and has been assessed in Volume 3, Chapter 3: Onshore Ecology and Nature Conservation (APP-075) in Section 3.11.6.

Reference	Written Representation Comment	Applicants' response
REP1-078 10.5.2	Policy ENV2 states that development that would directly or indirectly affect any sites of local importance will be permitted only where it is necessary to meet an overriding local public need or where it is in relation to the purposes of the nature conservation site.	The Applicants note the response.
REP1-078 10.5.3	The works proposed under Works nos. 8A/B involve underground tunnelling or trenchless construction, but as noted in the dDCO section, this restriction is ineffective.	See Applicants response to REP1-078 15.4.3.
REP1-078 10.5.4	There is also doubt about this approach on the basis that the overall lengths of underground boring through this and the adjacent works nos.6A/B and 9A/B are significant, and it would be expected that there must be breakout points that would result in impact during construction.	The Applicants refer Fylde Borough Council to Volume 1, Chapter 3 (F1.3/F03 AS-024) and Annex 5.3 to the Applicants response to Hearing Action Points: ISH1 13, 14, 16, 17 (REP1-040) which provides further detail on the trenchless technique crossing in this location. However, they can confirm that there will be no breakout points between the entry pit (situated in Works No. 10A/10B) and the exit pit (situated in Works No. 5A/5B or 4A/4B)
REP1-078 10.5.5	The likely impact is that FBC considers it is likely the development will give rise to adverse impacts with reference to FLP Policy ENV2.	The Applicants refer FBC to REP1078-10.3.2 which confirms that there will be no potential impact to St Annes Old Links Golf Course as a result of the Transmission Assets.
Onshore Heritage and Archaeology		
REP1-078 11.1.1	FLP Policy ENV5 sets out a requirement that development should conserve, protect and where appropriate, enhance the character, appearance, significance and historic value of both designated and undesignated assets.	The Applicants note this comment regarding local plan policy. This policy has been addressed within the design of the Transmission Assets which has sought to avoid or minimise effects on designated and non-designated heritage assets. This is set out in Table 5.9 of ES Volume 3, Chapter 5: Historic environment (APP-096).
REP1-078 11.1.2	With regards to listed buildings, the same policy further sets out that development which would result in the loss of significance or setting, will be refused unless the harm is justified by the public benefits of the proposal.	The Applicants note this comment regarding local plan policy. Some harm to listed buildings as a result of change within their setting is identified in ES Volume 3, Historic environment (APP-096). In each case the harm occurs during construction and is therefore short or medium term and fully reversible. The harm is less than substantial and would not result in

Reference	Written Representation Comment	Applicants' response
		permanent change within the setting of the listed buildings or any permanent change to their heritage significance. This less than substantial harm should be weighed against the public benefits of the Transmission Assets. The Applicants refer to paragraph 2.3.8 of the National Policy Statement for renewable energy infrastructure (NPS-EN3) which states ' <i>In considering the impact of the historic environment as set out in Section 5.9 of EN-1 and whether the Secretary of State is satisfied that the public benefits would outweigh any harm or loss to the significance of a designated heritage asset, the Secretary of State should take into account the positive role that large-scale renewable projects play in the mitigation of climate change, the delivery of energy security and the urgency of meeting the net zero target</i> '.
REP1-078 11.1.3	Similarly, where less than substantial harm would occur, this must also be weighed against the public benefits. Due regard has also been given to S66 of the Planning (Listed Building and Conservation Areas) Act 1990 and the national policy guidance contained in Chapter 16 of the NPPF.	The Applicants note this comment regarding local plan policy. The Applicants agree that S66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 is also a relevant consideration along with national planning policies set out in the National Planning Policy Framework.
REP1-078 11.1.4	The applicant has identified three listed buildings as being potentially impacted by the proposals and has awarded the 'medium sensitivity/value' whereas FBC considers a high level of value should be assigned to all three. For all three assets, this difference in opinion primarily arises from the contribution that setting makes to their significance. The applicant has attributed 'some' or 'limited' contribution from setting, whereas FBC considers that the setting makes a positive contribution in each case.	<p>The Applicants assume that Fylde Borough Council is referring to the listed buildings known as Hall Cross Farmhouse (Freckleton), Dixon's Farmhouse (Newton-with-Scales) and Dagger Cottage (Newton-with-Scales). All three of these are listed at Grade II.</p> <p>The methodology for assessment of likely impacts and effects on historic environment receptors (including listed buildings) is set out in Section 5.10 of ES Volume 3, Chapter 5: Historic Environment (APP-096). Table 5.11 in that document identifies that a 'medium' level of sensitivity or value is usually applied to Grade II listed buildings. The level of sensitivity or value can be raised to 'high' if the building can be shown to have exceptional qualities in their fabric or historical association which are not reflected in the listing grade. For each of the three listed buildings under consideration here, no exceptional qualities have been identified that would justify raising their level of sensitivity or value from 'medium' to 'high'.</p>

Reference	Written Representation Comment	Applicants' response
		<p>The contribution that the setting of a listed building makes to the significance of the building does not form part of the consideration of its level of sensitivity or value, which is based almost entirely on the listing grade.</p> <p>The detailed assessment of likely impacts and effects in respect of listed buildings is presented in ES Volume 3, Annex 5.5: Settings assessment (APP-102). Table 1.2 in that document describes the setting of each of the listed buildings and sets out the contribution that the setting makes to its heritage significance. For each of the three Grade II listed buildings, the appraisal includes the identification of both positive and negative factors within the setting. In all three cases the assessment found that the setting made a positive contribution to the significance of the listed building.</p>
REP1-078 11.1.5	In terms of impacts, the applicant does not appear to have assessed the visual impacts arising from the proposed substations upon the Grade II listed Dixons Farmhouse (LEN 1072035) and adjacent Grade II Dagger Cottage (LEN 1164155).	As set out in ES Volume 3, Annex 5.5: Settings assessment (APP-102), the Onshore Substations would not be visible from within or directly adjacent to either of these listed buildings. Consequently, there would be no visual impact arising from the construction, operation and maintenance, or decommissioning of the Onshore Substations.
REP1-078 11.1.6	Whilst they would be approximately 900m away, the landscape and its features, coupled with the proposed scale of the substations, mean that visual impact is likely and at the very least there should be an assessment of this impact.	The Applicants refer to the response provided above to REP1-078 11.1.5.
REP1-078 11.1.7	Additionally, as details of the duration and frequency of the proposed build-out are limited, as are details around proposed landscaping and mitigation, it is not possible to properly assess the level of impact.	The Applicants refer to the response provided above to REP1-078 11.1.5.
REP1-078 11.1.8	With regards to non-designated heritage assets, the applicant identifies several assets [APP- 097] but the assessment of these is very limited or absent. The assets are classified only in terms of their distance from the cable corridor. FBC considers that further assessment should be carried out. For example, Leach Lodge Farmhouse and cobble wall (LLB9/PRN6198), a surviving constructed cop (LLB10) and Thursby Nursing Home (LLB5) are	The locations of non-designated heritage assets are indicated on Figures 1.7 – 1.16 in ES Volume 3, Annex 5.1: Historic environment desk-based assessment (APP-097). None of the three assets referenced in the Written Representation are located within the Order Limits, although they are within the 500 m historic environment study area. Any impact to the significance of these non-designated heritage assets would therefore arise from changes

Reference	Written Representation Comment	Applicants' response
	within the cable corridor, but no assessment of the potential impacts are presented.	<p>within their setting during construction works within the Onshore Export Cable Corridor.</p> <p>The methodology for assessment of likely impacts and effects on historic environment receptors (including listed buildings) is set out in Section 5.10 of ES Volume 3, Chapter 5: Historic Environment (APP-096). Table 5.11 in that document identifies that a 'low' level of sensitivity or value is usually applied to locally listed buildings. A significant effect (in EIA terms) could only occur in respect of a locally listed building if the impact is of a 'high' degree of magnitude. In accordance with Table 5.12 in ES Volume 3, Chapter 5: Historic Environment (APP-096), a 'high' magnitude impact would result from a change within the setting of a heritage assets to the extent that the heritage significance of the asset is lost or substantially harmed. This is very unlikely to happen as a result of the construction works within the Onshore Export Cable Corridor, where the impacts would be short or medium term and fully reversible. These temporary changes would not affect the heritage significance of the locally listed buildings.</p> <p>The purpose of the EIA is to identify any likely significant effects of a proposed development, not all effects, thus a proportionate approach to assessment is required.</p>
REP1-078 11.1.9	FBC is very concerned that the proposed substations and associated development is close to Quaker's Wood Burial Ground (LLB22), no proper assessment of impact has been carried out, the application is not supported by a clear justification for the need for two substations, the size of those substations and their location close to heritage assets.	<p>With regard to the likely effects on the Quaker's Wood Burial Ground, the Applicants refer Fylde Borough Council to the response provided in Procedural Deadline A Submission – Annex 3.2.18 to Response to RR – Newton with Clifton Parish Council (RR-1616) (PDA-025), and also Annex 5.9 to the Applicants response to Hearing Action Points: ISH1 50 Rev F.01 (REP1-045).</p> <p>With regard to the requirement for two substations and the size of the substations, the Applicants refer Fylde Borough Council to Annex 5.2 to the Applicants response to Hearing Action Points: ISH1 6, 8, 9, 19, 26 & 28 (REP1-039).</p>
REP1-078 11.1.10	It is acknowledged that locally listed and non-designated heritage assets can attribute low significance, however a proper assessment must still be carried out. With regard to designated	With regard to locally listed and non-designated heritage assets, the Applicants refer to the response provided above to REP1-078 11.1.8.

Reference	Written Representation Comment	Applicants' response
	assets where significance can be higher, as it is, then the implications are more serious.	With regards to designated heritage assets, the Applicants refer Fylde Borough Council to Volume 3, Annex 5.5: Settings assessment (APP-102) and ES Volume 3, Chapter 5: Historic environment (APP-096). The Applicants consider that these documents present a thorough assessment of likely impacts and effects.
REP1-078 11.1.11	With regards to archaeology, FBC raised concerns in its relevant representations [RR-0705] that the baseline evidence, assessment and proposed monitoring and mitigation was not sufficient. This position is maintained.	The Applicants refer to the response provided in 705.5 in Procedural deadline A Submission - Annex 3.2.23 to Response to RR - Fylde Borough Council (RR-705) (PDA-030). A programme of further archaeological work to be undertaken prior to construction is set out in the Outline Onshore and Intertidal Written Scheme of Investigation (APP-214), which is secured through Requirement 11 within Schedules 2A and 2B of the Draft Development Consent Order (C1/F04). In addition, further work and appropriate mitigation for undiscovered archaeology is also set out in the Outline Onshore and Intertidal Written Scheme of Investigation (APP-214), which is secured through Requirement 11 within Schedules 2A and 2B of the Draft Development Consent Order (C1/F04).
REP1-078 11.1.12	Further to this, the uncertainty around the proposed works within the affected areas means that these impacts cannot be properly addressed. The cable routing, areas of above ground works and methods will alter the way in which below ground remains are impacted. Therefore, all potential development scenarios should be fully assessed. The likely impacts are that without sufficient details of the proposed build-out, operation and decommissioning, including details of the timing, duration and frequency of those impacts, harm will be caused to heritage assets, without proper assessment to enable that harm to be weighed against the public benefits.	The Applicants refer to the response provided above to REP1-078 11.1.11.
Landscape and Visual Effects		

Reference	Written Representation Comment	Applicants' response
REP1-078 12.1.1	<i>Introduction</i> Fylde is characterised by its coastline and gentle undulating landscapes, with its largely attractive qualities helping to make Fylde a popular place to live, work and visit.	The Applicants note this commentary on Fylde's character.
REP1-078 12.1.2	FLP Strategic Policy ENV1 sets out the requirements for development with regards to landscape, with Policy GD7 setting out more general principles of good design, including with specific reference to landscape in criteria d, e, h and m.	The Applicants refer to Table 10.6: Summary of local planning policy relevant to this chapter of Volume 3, Chapter 10: Landscape and Visual Resources (APP-123), which sets out how and where this policy was considered in the ES.
REP1-078 12.1.3	The Fylde landscape is unique in character and exhibits rare, regionally important landscape qualities which are interconnected with its biodiversity and ecological value. The landscape of the seafront and dunes and the rural, agricultural landscape beyond are high quality and highly valued by residents, those who visit the area and those whose livelihoods are linked to this landscape. By their very nature, these landscapes are changing and are very sensitive to external forces.	The Applicants note this commentary on Fylde's character.
REP1-078 12.1.4	The proposed development would occupy a 17 km long tract of landscape between the point of cable landfall and the onshore substations, before crossing the River Ribble south towards the Penwortham substation.	The Applicants note this commentary.
REP1-078 12.1.5	The cable corridor itself will measure up to 100m wide and widening to 180 m wide at the Network Rail crossing and branching into two separate channels at a number of other sensitive locations.	
REP1-078 12.1.6	The corridor crosses the following Landscape Character Areas identified by Lancashire County Council in their document A Landscape Strategy for Lancashire (December 2000): <ul style="list-style-type: none"> • 15d Coastal Plan – The Fylde • 16b Mosslands – South Fylde Mosses; and 	The Applicants refer to Section 10.7.2 Landscape character baseline of Volume 3, Chapter 10: Landscape and Visual Resources (APP-123), which sets out the identified national and regional landscape character areas within the study area of the assessment. The landscape characteristics with potential to be affected have been identified and described in Volume 3, Annex 10.2: Landscape character baseline technical report (APP-125).

Reference	Written Representation Comment	Applicants' response
	<ul style="list-style-type: none"> 19a Coastal Dunes – Fylde Coast Dunes 	Extracts of published assessments reproduced in the Appendix A to Volume 3, Annex 10.2: Landscape character baseline technical report (APP-125), provides further detail on landscape characteristics for relevant character areas
REP1-078 12.1.7	The proposed route also crosses the Ribble estuary RAMSAR site, SSSIs, semi-natural greenspace, Green Belt, open countryside and an Area of Separation, all of which are designated landscapes protected by strategic environmental policies set out in the FLP.	<p>The Applicants refer to Section 10.7.5 Designated sites of Volume 3, Chapter 10: Landscape and Visual Resources (APP-123), which lists the other designated sites of relevance in Table 10.12. Table 10.12 details their relevant qualifying interest to the LVIA.</p> <p>Volume 3, Chapter 5: Historic Environment (APP-096) and Volume 3: Chapter 13: Onshore ecology and nature conservation (APP-075) provide further information on historic and ecological designations, respectively.</p>
REP1-078 12.1.8	The landscape and visual impact assessment undertaken by the applicant [APP-123] concludes that through the avoidance of key receptors and by sensitive design, engineering and landscape mitigation, many of the landscape and visual effects resulting from the proposed corridor could be overcome and most visual impacts being localised and short term.	<p>The Applicants refer Fylde Borough Council to REP1-078 3.2.1 which addresses the points raised regarding timing, duration, frequency and phasing.</p> <p>The Applicants stand by the assessment within the ES and its conclusions, which have been prepared in accordance with best practice EIA guidance and undertaken by chartered and experienced practitioners appointed to deliver this part of the DCO submission. There are no details pertaining to the Volume 3, Chapter 10: Landscape and Visual Resources (APP-123) that are absent or insufficient to adequately inform the assessment. There is no increased potential for the recorded impacts to become long term or permanent based on the nature of the assessment reporting.</p>
REP1-078 12.1.9	However, FBC is concerned about the lack of details concerning the timing, duration and frequency of those impacts. Details are absent and as a result, there exists an increased potential for these impacts to become long term or permanent. The ES and its conclusions are inadequate.	<p>Duration and Frequency of the impact</p> <p>The assessment of effects in Volume 3, Chapter 10: Landscape and Visual Resources (APP-123) is undertaken based on the maximum design scenario (worst case) described in the methodology. There are no 'longer term visual effects' to be addressed and minimised that have not already been properly captured and assessed in Volume 3, Chapter 10: Landscape and Visual Resources (APP-123).</p>

Reference	Written Representation Comment	Applicants' response
		<p>The Applicants refer to Table 10.18 which sets out – under the heading ‘Justification’ – the maximum design scenarios used to determine which project elements, whether activities or infrastructure, are likely to result in the greatest potential effects on identified landscape resources and / or visual receptors.</p> <p>Furthermore, the opening subsections of <i>Section 10.12: Assessment of Effects</i>, confirm that impacts were considered during the construction, operational and decommissioning phases of the Transmission Assets (covering both daytime and night-time periods) and were informed by the construction programme durations provided in Table 3.4 of <i>Volume 1, Chapter 3: Project Description of the ES</i> (F1.3/F03).</p> <p><i>Volume 3, Annex 10.4: Landscape and Visual Impact Assessment Methodology</i> (APP-127), at paragraphs 1.4.5.4 to 1.4.5.5 and 15.3.4, sets out the LVIA’s definitions of the duration and reversibility of effects on visual and landscape receptors during the various phases of the Transmission Assets. It is stated that such effects will be reversed at the end of the relevant period. For clarity, durations are defined as follows:</p> <ul style="list-style-type: none"> • <u>Short term</u>: a period of months, up to one year (reversible); • <u>Medium term</u>: a period of more than one year, up to five years (reversible); or • <u>Long term</u>: a period of greater than five years (permanent or reversible). <p>Moreover, the LVIA consistently outlines in the subsections titled ‘Magnitude of Impact’ the expected duration and spatial extent of effects on landscape character and visual receptors arising from construction activities. The timing of works — whether concurrent or sequential — is typically specified. In instances where this distinction is not explicitly made, the assessment should be understood to reflect the greatest potential effect under any given scenario.</p> <p>It is important to note that the LVIA concludes its assessment for each potentially affected visual and landscape receptor by stating the significance of effect in EIA terms. Definitions of the levels of significance are provided in paragraph 10.11.4.6 of <i>Volume 3, Chapter 10: Landscape and Visual</i></p>

Reference	Written Representation Comment	Applicants' response
		Resources (APP-123), which clarify the degree of influence these effects are intended to have within the decision-making process.
REP1-078 12.1.10	Whilst FBC accepts much of the proposed development apart from the sub stations would be below ground on completion of the works and as a consequence the longer-term visual effects could be minimised, this is dependent on the timing, phasing, duration and the frequency of construction and remediation and decommissioning.	The Applicants refer Fylde Borough Council to REP1-078 3.2.1 which addresses the points raised regarding timing, duration, frequency and phasing.
REP1-078 12.1.11	The development will occupy a wide corridor which during the construction phase would include: the installation of temporary fencing; creation of areas of hard standing for up to 18 construction compounds, which will be lit during nighttime working; site clearance; construction of new junctions and temporary haul roads; excavation of open cut trenches; and stockpiling of soil and materials.	
REP1-078 12.1.12	There is very limited detailed information regarding the timing, phasing, duration, frequency, design or locations of any of the above temporary works, as well as the permanent structures which would be required as part of the project.	
REP1-078 12.2.1	<i>Topography and Landscape</i> The topography of Fylde is generally flat land with limited tree cover, offering areas with longer and extended panoramic views.	The Applicants note this commentary on Fylde's general topography.
REP1-078 12.2.2	The magnitude and longevity of these effects on views and the landscape character will be dependent upon the timing, duration, frequency, design and intensity of the proposed temporary and permanent development.	The Applicants refer Fylde Borough Council to REP1-078 3.2.1 which addresses the points raised regarding timing, duration, frequency and phasing. In addition the Applicants refer to their response provided at REP1-078 12.1.9, highlighting how Volume 3, Chapter 10: Landscape and Visual Resources (APP-123) outlines in the subsections titled 'Magnitude of Impact' the expected duration and spatial extent of effects on landscape character and visual receptors arising from construction activities and operation of the Proposed Development.

Reference	Written Representation Comment	Applicants' response
REP1-078 12.2.3	The proposed site for the landfall of the transmission cables on the seafront between Blackpool and St Annes-on-the-Sea is in an area of particularly high landscape sensitivity and within the Coastal Change Management Area defined by FLP Policy ENV1.	<p>The Applicants refer to paragraphs 10.12.2.7 to 10.12.2.20 of the Volume 3, Chapter 10: Landscape and Visual Resources (APP-123), which detail the assessment of direct and indirect impacts on <i>Landscape Character 19: Coastal Dunes – 19a Fylde Coast Dunes</i>, the landscape character area in which the landfall is situated.</p> <p>Within these paragraphs, it identifies the sensitivity of this relatively small character area as 'high', acknowledging that:</p> <p><i>"...the coastal landscape at the landfall location has a low capacity to accommodate the temporary construction activities which, although relatively small in scale, would be discordant and prominent locally within an attractive, open context. The coastal landscape is relatively exposed and wild in character with few detracting features on the seaward side and higher levels of tranquillity, resulting in a high susceptibility to temporary change as a result of the construction activities."</i> [paragraph 10.12.2.17]</p> <p>Similarly, paragraph 10.12.6.13 to 10.12.6.13 of Volume 3, Chapter 10: Landscape and Visual Resources (APP-123) sets out the assessment of potential impacts experienced by people using the beach for leisure and recreation.</p> <p>The assessment concludes that the potential construction effects on this landscape character area and visual receptors would be of moderate to major adverse significance during both daytime and night-time periods – an effect considered significant in EIA terms. This reflects and fairly reports the concerns raised by FBC. Definitions for levels of significance are provided at paragraph 10.11.4.6 of Volume 3, Chapter 10: Landscape and Visual Resources (APP-123).</p>
REP1-078 12.2.4	This policy prevents development unless seven criteria area met, including that it "is appropriate and in keeping with the open character of the coastline." And forms part of a nationally important ecological site and biodiverse resource which is highly valued. It is also an important local asset fundamental to the experiential landscape of the beach.	The Applicants provide a response to this comment at REP1-078 12.2.3 above.

Reference	Written Representation Comment	Applicants' response
REP1-078 12.2.5	The proposals include temporary closure of parts of the beach, along with temporary structures, plant and storage associated with the build-out phase.	
REP1-078 12.2.6	Whilst FBC considers that the natural topography of the site could provide some mitigation of some of the visual effects and the prolonged effects on landscape character could be mitigated in part by the trenchless installation beneath the dunes.	
REP1-078 12.2.7	However, disturbance during construction would undoubtedly have implications for the tranquillity of the beach front, the biodiversity of the dunes and their subsequent restoration. Risks associated with the construction methodologies can only be estimated and the potential for long-term change is high.	
REP1-078 12.2.8	The installation of the transition joint bays on the beach would also introduce a significant discordant manmade features that are likely to bring about long term negative visual and landscape impacts.	<p>The Transition Joint Bays will be located in Blackpool Airport, rather than the beach, as shown within Works No. 10A10B on the Works Plans - Onshore and Offshore Part 1 of 2 (AS-017).</p> <p>The Applicants refer to paragraph 10.12.2.60 of the Volume 3, Chapter 10: Landscape and Visual Resources (APP-123) , which details the magnitude of impacts Landscape Character 16: <i>South Fylde Mosses – 16b Mosslands</i> (the landscape character area in which the TJB is situated).</p> <p>The Applicants agree at paragraph 10.12.2.60 that the “... <i>temporary cable laying activities and construction corridor would be discordant...</i>” within the prevailing landscape of the LCA; and that effects could be experienced for a ‘long-term’ duration (in LVIA terms) in the event of a sequential construction of the Transmission Assets. However, it should be acknowledged, as also noted in paragraph 10.12.2.60, that the magnitude of impact would be “reversible in nature”, due to being buried infrastructure and potential indirect effects would not extend beyond the 1 km of the onshore export cable corridor.</p> <p>The assessment concludes that the potential direct effects on this landscape character area would be of moderate adverse significance, during both daytime and night-time period. This reflects and fairly reports the concerns</p>

Reference	Written Representation Comment	Applicants' response
		raised by FBC. Definitions for levels of significance are provided at paragraph 10.11.4.6 of Volume 3, Chapter 10: Landscape and Visual Resources (APP-123).
REP1-078 12.2.9	Along the transmission corridor, the introduction of built elements, particularly the two proposed substations, would fundamentally alter the long-term character of the local rural landscape and available views across it from settlements, isolated dwellings, roads and footpaths, introducing discordant, urban elements into otherwise open or agricultural landscapes.	<p>The Applicants refer FBC to Sections 3.15.2 and 3.15.7 of Volume 1, Chapter 3: Project Description (F1.3/F03), which confirm the above-ground elements that would form part of the operational Project, including link boxes, transition joint bays and two onshore substations. However, it must be noted that the above-ground element of the transition joint bays and link boxes will only comprise manhole covers that will be set at ground level to provide access during the operation and maintenance phase. Visibility of this component will therefore be highly localised and minimal.</p> <p>The baseline landscape character context for the proposed substations is described in Appendix A of Volume 3, Annex 10.2: Landscape character baseline technical report (APP-125).</p> <p>The Applicants note the existing and documented landscape character of the proposed onshore substation sites and its surrounding landscape, which include the presence of existing electricity transmission infrastructure (comprising overhead power lines and pylon structures). This infrastructure traverses across the landscape in which the onshore substations sites are located. Additionally, within the surrounding landscape of the onshore substation site, clusters of farmsteads and associated agricultural buildings are also apparent in views across the area, contributing to the baseline context in the above ground components of the Transmission Assets would be seen.</p> <p>The assessment of effects does not conclude that the two onshore substations would lead to the fundamental alteration of the long-term character of the local rural landscape and available views across it from settlements, isolated dwellings, roads and footpaths. However, it is acknowledged that there will be local effects on landscape character and visual receptors, as described in Section 10.12 of Volume 3, Chapter 10: Landscape and Visual Resources (APP-123).</p>

Reference	Written Representation Comment	Applicants' response
		With regard to potential alterations to landscape character, the Applicants refer to their response at REP1-078 12.2.3 above. This response notes how Volume 3, Chapter 10: Landscape and Visual Resources (APP-123) consistently sets out, within the subsections titled 'Magnitude of Impact', the anticipated duration and spatial extent of effects on landscape character and visual receptors arising from both during the construction phase activities and the operational phase of the Proposed Development. Each potentially affected visual and landscape receptor is assessed in terms of the significance of effect, as defined in EIA terms. The levels of significance are intended to guide the decision-making process by clarifying the degree of weight attributed to each identified effect.
REP1-078 12.2.10	The cumulative effects are likely to have a significant negative impact on some views where the structures are seen together and/or in succession as receptors move through the landscape.	<p>The Applicants refer to Section 10.14 of Volume 3, Chapter 10: Landscape and Visual Resources (APP-123), which sets out the assessment of cumulative seascape, landscape and visual effects of the following:</p> <ul style="list-style-type: none"> • Effects arising from the Transmission Assets in conjunction with existing offshore and onshore projects as described in <i>Section 10.13</i> of Volume 3, Chapter 10: Landscape and Visual Resources (APP-123). This cumulative assessment concludes that there would be no potential for significant cumulative effects to arise on visual amenity. • Effects resulting from the Transmission Assets in conjunction with planned Tier 1 offshore and onshore projects listed in Table 10.22 of Volume 3, Chapter 10: Landscape and Visual Resources (APP-123). <p>The cumulative assessment of the Transmission Assets in conjunction with planned Tier 1 offshore and onshore projects (within Fylde Borough) concludes that there would be potential for significant adverse cumulative effects on the following visual receptors:</p> <ul style="list-style-type: none"> • People using Public Rights of Way within 1 km of the onshore export cable corridor, during the construction phase, see Table 10.27. • Local residents on the edges of Lytham St Annes and Newton-with-Scales, during the construction phase, see Table 10.27.

Reference	Written Representation Comment	Applicants' response
		<ul style="list-style-type: none"> • People using Public Rights of Way within 1 km of the 400 kV grid connection cable corridor, during the construction phase see Table 10.28. • Local residents that are located close to the the 400 kV grid connection cable corridor, during the construction phase see Table 10.28.
REP1-078 12.3.1	<p><i>The Sub Stations</i></p> <p>Specifically, the two proposed substations would be located within the area designated as an Area of Separation in FLP Policy GD3, this would significantly weaken the policy's ability to preserve the character and distinctiveness of the individual settlements of Newton with Scales and Kirkham.</p>	<p>The Applicants refers FBC to Figure 10.4 of Volume 3, Figures - Part 5 of 7 (APP-135), which demonstrates that two onshore substation sites would be located <u>outside</u> of the extent of 'Strategic Policy GD3: Areas of Separation', and therefore, they would not compromise the function of the gap between Kirkham and Newton.</p> <p>The Applicants would also refer FBC to Volume 1, Annex 4.3: Selection and Refinement of the Onshore Infrastructure (APP-033). This document demonstrates the robust process of site selection and refinement undertaken by the Applicants in determining the routing and placement of the Transmission Assets onshore infrastructure through from inception to DCO submission. This document illustrates how the site selection and refinement process has led the onshore substation sites to be outwith the Area of Separation.</p>
REP1-078 12.3.2	<p>Having regard to this policy and to the general principles of good design required by FLP Policy GD7 the applicants should have provided details so that the ExA, LPA and local communities could understand and assess whether the design of the proposed substations from the surrounding areas could be managed and/or mitigated. However, the applicants have not assessed impacts thoroughly in the ES and the dDCO as drafted does not provide sufficient control.</p>	<p>The Applicants refer to Section 10.9 of Volume 3, Chapter 10: Landscape and Visual Resources (APP-123), which sets out the three types of mitigation measures adopted as part of the Project, referred to as 'Commitments'. Table 10.16 of Volume 3, Chapter 10: Landscape and Visual Resources (APP-123) identifies the embedded mitigation measures adopted by the Applicants and states how these measures will be secured through the DCO process. Requirement 4 of Schedules 2A & 2B of the draft DCO (REP1-008) requires the Applicants to submit a range of details concerning the onshore substation works for approval to the relevant planning authority before commencement of such works.</p> <p>In addition, Table 10.17 of Volume 3, Chapter 10: Landscape and Visual Resources (APP-123) outlines further measures contained within the following documents:</p>

Reference	Written Representation Comment	Applicants' response
		<ul style="list-style-type: none"> • Outline Landscape Management Plan (AS-050); and, • Outline Design Principles (APP-209), <p>Both of these will inform and guide the detailed design of the Transmission Assets post-consent.</p> <p>The outline Design Principles (oDP) (APP-209) sets out the considerations that will inform the detailed design of the permanent works at each of the onshore substations, including their height, layout and maximum footprint. The detailed design of each of the substations will be developed substantially in accordance with the oDP, as secured by Requirement 4(2) of Schedule 2A and Schedule 2B of the draft DCO (C1/F04). These details will be submitted to and approved by the relevant planning authority prior to start of construction at each of the onshore substations.</p> <p>The Applicants therefore stand by the assessment within the ES and its conclusions, which have been prepared in accordance with best practice EIA guidance and procedures and have been informed where relevant by feedback at the pre-application consultation stages. The Applicants consider that adequate measures have been put in place in relation to pre and post consent design to ensure there is sufficient control, and that 'good design' can be delivered.</p> <p>The Applicants will proactively engage with Fylde Borough Council in regard to design as part of the development of the final details of the substations and the final Landscape Management Plan.</p>
REP1-078 12.3.3	There is also limited information available regarding the substations construction phasing and delivery. It is imperative that the design and impacts of the substations themselves and the enclosures be examined as part of the mitigation process, with innovative and considered modifications to the design, footprint and height of the facilities.	<p>The Applicants refer Fylde Borough Council to REP1-078 3.2.1 which addresses the points raised regarding timing, duration, frequency and phasing. The Applicants would emphasise that there will be no formal 'phasing' in the construction and delivery of each of the substations.</p> <p>In relation to the design process, the Applicants refer to REP1-078 12.3.2 above.</p>
REP1-078 12.3.4	It is FBCs firm opinion the likely impacts of the substation proposals would give rise to permanent unacceptable long	The Applicants reaffirm their response at REP1-078 12.2.3 above.

Reference	Written Representation Comment	Applicants' response
	distance and localised landscape harm and the ES is inadequate in its assessment.	<p>The Applicants stand by Volume 3, Chapter 10: Landscape and Visual Resources (APP-123) and the assessment conclusions, which have been prepared in accordance with best practice EIA guidance and procedures by Chartered and experienced practitioners.</p> <p>Furthermore, the Applicants refer to paragraph 10.5.1.10 of the Volume 3, Chapter 10: Landscape and Visual Resources (APP-123) , which concludes – based on analysis of the Zone of Theoretical Visibility (ZTV) study and field survey verification – that views of the onshore substations would be largely confined to the immediate vicinity of the site and would not be considered 'long distance'. Visibility would be limited to a radius of approximately 700 metres, principally extending over visual receptors located on the Public Rights of Way (PRoW) network (FPB0505003, FPB0505005, BW0505016, and BW0509012), as well as nearby local roads (Kirkham Road, Lower Lane, Parrox Lane) and the outer edges of settlements including Newton with Scales, Kirkham, Hall Cross village, and associated residential development at Higher House.</p> <p>On this basis, the Applicants refutes FBC comment that there would be any "long-distance" visual impacts arising from the onshore substations.</p> <p>In addition, as set out in Section 3.20 of Volume 1, Chapter 3: Project Description (F1.3/F03), the onshore substation is expected to operate for a maximum of 35 years. In LVIA terms, this constitutes a 'long-term' duration, after which the infrastructure would be decommissioned and the land reinstated.</p>
REP1-078 12.4.1	<p><i>Trees and Hedgerows</i></p> <p>A review of the Tree Survey and Arboricultural Impact Assessment reports [APP-128 and APP- 129] shows that more than 60 mature trees and 69 hedgerows that would be completely or partially removed as a result of the proposed development. However, conflicting information exists with regards to restoration this is a concern.</p>	<p>The Applicants confirm that Volume 3, Annex 10.5: Tree survey and arboricultural impact assessment Parts 1 and 2 (APP-128 and APP- 129) are the correct source from which to identify the trees and hedgerows to be removed, in accordance with a Maximum Design Scenario.</p> <p>The Outline Landscape Management Plan (AS-050) details that where hedgerows and trees are crossed using open cut trenching techniques, measures would be taken to minimise vegetation removal and damage,</p>

Reference	Written Representation Comment	Applicants' response
REP1-078 12.4.2	In places documents refer to restoration with like for like, other instances refer to restoration with species rich hedgerows, phrases such as 'wherever practicable', 'subject to landowner agreement', 'may' or 'might' are used to detail potential restoration.	<p>where practicable. These measures are likely to include reducing the length of hedgerow removed and avoiding trees at crossing points, where possible.</p> <p>The Applicants can clarify that it is their full intention for all trees to be restored with a 'like-for-like- species of an appropriate size to support the successful established. Likewise, hedgerows will be restored with appropriate species of an appropriate size, which in most instances, will comprise a species rich hedgerow. Planting specifications and restoration designs will be defined through the discharge of Requirement 6 of the draft DCO which states:</p> <p><i>6.—(1) No stage of the Project A/Project B onshore works may commence until a written landscaping scheme and associated work programme in accordance with the outline landscape management plan for the relevant stage has been submitted to and approved by the relevant planning authority.</i></p> <p><i>(2) The written landscaping scheme must include details of all proposed hard and soft landscaping works including—</i></p> <p><i>(a) location, number, species, size and planting density of any proposed planting including any trees; and</i></p> <p><i>(b) implementation timetables for all landscaping works.</i></p> <p>The Applicants have made a commitment (CoT15 of Volume 1, Annex 5.3: Commitments Register of the ES (F 1.5.3/F03)) to developing Detailed Landscape Management Plan(s) in line with the Outline Landscape Management Plan as approved by Fylde Borough Council (AS-050). This is secured by Requirement 6 within Schedules 2A & 2B of the draft Development Consent Order (C1/F04).</p>
REP1-078 12.4.3	In FBC view repeated works will be more likely to cause long term damage to the more fragile landscapes, such as the dunes and Fen Carr remnants which will not be mitigated successfully. Importantly sequential installation would prolong the visual and physical landscape disturbances.	<p>The Applicants refer their response at REP1-078 12.2.3 above, noting that the assessment presented in Volume 3, Chapter 10: Landscape and Visual Resources (APP-123) has been undertaken on the basis of maximum design scenario, which considered the sequential construction of the Transmission Assets (rather than concurrent). This presents the longest potential construction phase. Volume 3, Chapter 10: Landscape and Visual Resources (APP-123) therefore provides a fair, robust, and comprehensive</p>

Reference	Written Representation Comment	Applicants' response
		<p>assessment of potential impacts on relevant landscape resources and visual receptors in this regard.</p> <p>With reference to term 'repeated works' used by FBC, the Outline Landscape Management Plan and Code of Construction Practice (CoCP) would control construction process and activities to protect all the landscape features that define the landscape character of the coastal dunes and Fen Carr.</p> <p>The Code of Construction Practice (CoCP) (APP-193) is secured under Requirement 8 of Schedules 2A & 2B of the draft DCO (REP1-008).</p>
REP1-078 12.4.4	<p>Whilst the proposals for installation, mitigation and enhancement of the physical and visual effects of the scheme could improve some visual appearance of the proposal in the rural environment and reduce adverse effects on the landscape character. FBC considers that it is likely that there would still be resultant significant residual effects on the landscape. The likely impacts are that the development would result in a long-term change to the appearance and use of the land along the transmission corridor, and consequently permanently alter the characteristics of certain parts of it.</p>	<p>The Applicants note FBC's concerns regarding the potential for lasting changes arising from the Transmission Assets. The Applicants stand by their assessment within the ES and its conclusions, which have been based on maximum design scenarios to ensure that the greatest potential effects on landscape resources are identified and assessed. For each potentially affected receptor, the ES presents a clear conclusion supported by the assessor's determination of the "significance of residual effect" in EIA terms.</p> <p>Definitions of significance levels are provided throughout the ES, clarifying the weight these effects are intended to carry within the decision-making process. However, the Applicants maintain that the cables would not alter the characteristics of the landscape character.</p>
REP1-078 12.4.5	<p>The effects of the proposed development would also impact on drainage and the water table, and in turn would impact upon the native flora and fauna. This, alongside the creation of exclusion areas, where existing land management practices are restricted and the removal of existing trees and woodland, even if temporary but over an extended period of time would result in specific changes to the landscape character and views.</p>	<p>The Applicants have assessed the potential impacts on groundwater flow and drainage (in Volume 3, Chapter 1: Geology, hydrogeology and ground condition (APP-068) and Chapter 2: Hydrology and flood risk (APP-070)). No significant residual effects were predicted.</p> <p>The Applicants' position is that there would not be any specific changes native flora and fauna that would affect the landscape character and views.</p>
REP1-078 12.5.1	<p><i>Methodology and approach</i></p> <p>Requirements for assessing the effects on landscape and visual matters are primarily set out in Section 5.10 of EN-1. This includes specific reference in 5.10.4 to the fact that effects arise not only from the sensitivity of the landscape but also from the nature and</p>	<p>The Applicants refer to their response at REP1-078 12.1.8 above.</p> <p>The Applicants stand by the assessment within the ES and its conclusions and can confirm that Section 5.10 of EN-1 has been fully considered in the assessment.</p>

Reference	Written Representation Comment	Applicants' response
	magnitude of change proposed. Paragraph 5.10.6 goes on to state that the aim should be to minimise harm to the landscape, with 5.10.22 requiring that landscape impacts of emissions from construction and operational activities should be considered. Specific guidance for decision making included at 5.10.36 refers to consideration of temporary impacts and associated timescales of those impacts.	
REP1-078 12.5.2	Importantly the ES does not carry out an assessment in accordance with the requirements and principles set out in EN-1. It is not clear on what basis the applicants have carried out an appropriate assessment of landscape impacts in the ES.	The Applicants stand by their ES, LVIA (APP-123) and their conclusions, which have been prepared in accordance with best practice EIA guidance and procedures by Chartered and experienced practitioners, as set out in the Applicants response at REP1-078 12.1.8 above The Applicants' assessment of landscape impacts has been undertaken in accordance with the requirements of EN-1 (see Table 10.2 of Volume 3, Chapter 10: Landscape and visual resources (APP-123)),
REP1-078 12.5.3	The Landscape and Visual Impact Assessment Methodology [APP-127] does not include a full explanation, for example in defining what is meant by a temporary impact and justifying no more nuanced consideration of timing (including with reference to seasonality), duration or frequency.	The Applicants refer to their response at REP1-078 12.1.8 above.
REP1-078 12.5.4	The methodology [APP-127] as presented, asserts at 1.5.3.5 that duration and permanence are considered but without explanation. The only potentially relevant element is at 1.1.2.7 where reference to the maximum design scenario set out in Table 10.18 of the main associated ES chapter [APP-123]. With regards to maximum duration of impacts, Table 10.18 simply sets out the following: <ul style="list-style-type: none"> • Construction phase: sequential construction as this presents the longest potential construction phase. • Operation: 35 years. • Decommissioning: the justification is the same as that set out for construction. 	The Applicants refer to their response at REP1-078 12.1.8 above.

Reference	Written Representation Comment	Applicants' response
REP1-078 12.5.5	All of the above suggests that the methodology is to consider the worst-case scenario. However, there is no element of the ES which models the impacts for these maximum durations for the draft order limit. It is therefore unclear and a concern to FBC as to what basis the landscape and visual impact assessment has been carried out.	The Applicants refer to their response at REP1-078 12.1.8 above.
REP1-078 12.6.1	<i>Green belt</i> FBC considers the justification for development within the Green Belt has not been properly assessed. FBC has due regard to Section 5.11 of EN-1 which states that there is a general presumption against inappropriate development in the Green Belt, and to NPPF Paragraph 160 which specifies that elements of many renewable energy projects will comprise inappropriate development within the Green Belt and therefore requires that very special circumstances are demonstrated.	<p>The Applicants refer FBC to their response in Procedural Deadline A Submission – Annex 3.2.23 to Response to RR-Fylde Borough Council (RR-705) (PDA-030), specifically at 705.14.</p> <p>The test for very special circumstances has been met.</p> <p>The Applicants maintain that the Transmission Assets benefit from the presumptions given to Critical National Priority (CNP) Infrastructure, set out in paragraphs 4.2.16 and 4.2.17 of EN-1, which state that the “<i>Secretary of State will take as the starting point for decision making that such infrastructure is to be treated as if it has met any tests which are set out within the NPPs, or any other planning policy, which requires a clear outweighing of harm, exceptionality or very special circumstances</i>” provided that the mitigation hierarchy requirements set out in paragraph 3.3.63 of EN-1 have been met (as set out in Section 3.4.4.15 of the Planning Statement (REP1-032). This includes the requirements for very special circumstances to justify development in the Green Belt.</p> <p>Whilst paragraph 160 of the NPPF stipulates that when located within the Green Belt, elements of many renewable energy projects will comprise inappropriate development, which requires very special circumstances to be demonstrated; it goes on to state that “<i>Such very special circumstances may include the wider environmental benefits associated with increased production of energy from renewable sources</i>”.</p> <p>The Applicants have demonstrated the need for and benefits to be delivered by the Transmission Assets in Section 6 of the Planning Statement (REP1-032). This includes the significant beneficial impacts of the Transmission Assets as a result of energy transmission from renewable source. This means that even if the Transmission Assets were not considered to be CNP</p>

Reference	Written Representation Comment	Applicants' response
		Infrastructure, very special circumstances do indeed exist to outweigh the harm to Green Belt by reason of inappropriateness or any other harm.
REP1-078 12.6.2	NPPF Paragraph 153 sets out that very special circumstances will not exist “unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations.” Further guidance is presented in PPG Paragraph: 013 Reference 64-013-20250225, which advises that issues such as duration, remediability and the degree of activity may be relevant consideration.	<p>Notwithstanding that the starting point for decision-making is that the test of very special circumstances is presumed to be met by virtue of the works comprising CNP Infrastructure, as discussed above, the Applicants have demonstrated that any harm likely to be caused to the Green Belt by reason of inappropriateness or any other harm, is clearly outweighed by other considerations.</p> <p>An assessment of the significant need for and benefits to be delivered by the Transmission Assets, which includes the significant beneficial impacts to be realised by energy transmission from renewable sources, and consideration of how they relate to the planning balance is presented in Section 6 of the Planning Statement (REP1-032).</p> <p>NPS EN-1 (paragraph 3.2.6) states that “<i>all applications for development consent for the types of infrastructure covered by this NPS [should be assessed] on the basis that the government has demonstrated that there is a need for those types of infrastructure which is urgent...</i>” and that “<i>substantial weight should be given to this need when considering applications for development consent under the Planning Act 2008</i>” (paragraph 3.2.7).</p>
REP1-078 12.6.3	FBC considers that the applicant has not properly justified the need of the Green Belt location for the substations. The information in the ES relies heavily on availability of the land in justifying the selected site. Similarly, FBC considers that the need for two substations and the size of those substations has not been properly justified, with specific reference to the Green Belt tests.	<p>The Applicants refer FBC to Volume 1, Annex 4.3: Selection and Refinement of the Onshore Infrastructure (APP-033). This document demonstrates the robust process of site selection and refinement undertaken by the Applicants in determining the routing and placement of the Transmission Assets onshore infrastructure through from inception to DCO submission. This document illustrates how the site selection and refinement process considered Green Belt as part of the environmental constraint analysis, and how Transmission Assets have been sited to avoid (where practicable) areas within the Green Belt.</p> <p>The Applicants would refer Fylde Borough Council to Annex 5.2 to the Applicants response to Hearing Action Points: ISH1 6, 8, 9, 19, 26 & 28</p>

Reference	Written Representation Comment	Applicants' response
		(REP1-039), which provides clarity on the need for two onshore substations as the projects must be electrically independent. In addition, the Applicants provided a comparison to the size of the onshore substation to other offshore wind farms, this can be found in Annex 5.5 to the Applicants response to Hearing Action Points: ISH1 20 Comparable Onshore Substation Platform Footprints (REP1-042).
REP1-078 12.7.1	<i>Landscape Summary</i> The likely impacts are that harm, including long term and permanent harm, would be caused and that significant and critical parts of the proposed development would not be appropriate to the landscape character, amenity and tranquillity in which it is situated.	The Applicants refer to their response at REP1-078 12.1.8 above.
REP1-078 12.7.2	The methodology presented in the ES does not fully assess the impacts of the proposals. Additionally, the proposals would include inappropriate development within the Green Belt which has not been justified. The harm which would be caused cannot be properly weighed against the public benefits as the application is not supported by sufficient details to enable this weighing up.	The Applicants refer to their response at REP1-078 12.1.8 above, in relation to the assessment on landscape resources and visual receptors. The Applicants refer to their responses at REP1-078 12.6.1 to 12.6.3 in relation to Green Belt matters.
Business and Tourism		
REP1-078 13.1.1	<i>Introduction</i> The Fylde coast is one of the dominant features of the Borough. The largest towns, Lytham and St Annes, together have a strong reputation as a high-quality resort with their significant visitor attractions along with their distinctive seafronts and an internationally famous championship golf courses.	The Applicants note the response. ES Volume 4, Chapter 2: Socio-economics (APP-141) includes a baseline characterisation of the area including seafront assets such as St Annes Pier, and Royal Lytham and St Annes golf course. The assessment of effects concludes there are no likely significant effects on any visitor economy assets/attractions in Fylde.
REP1-078	Other significant settlements are Warton and Freckleton, lying further east, and Kirkham and Wesham, which together form the	The Applicants note the response.

Reference	Written Representation Comment	Applicants' response
13.1.2	only sizeable inland settlements and contribute to strategic economic and infrastructure.	
REP1-078 13.1.3	With a total of 3.067 million tourism visits worth more than £214 million in 2014, equating to 5% of all tourism visits to Lancashire, the Fylde Council area has a strong and consistent visitor offer that includes a variety of major events.	The Applicants note the response.
REP1-078 13.1.4	(FLP Section 2.4) Part of this offer are the natural assets such as the expansive beach, Lytham Green and surrounding rural areas, which appeal to walkers, cyclists and other visitors.	The Applicants note the response.
REP1-078 13.1.5	The economic functionality of the Fylde Coast sub region, in particular the western coastal area is apparent through the strong travel to work patterns and employment with a shared tourism and cultural offer, public sector administration and a shared infrastructure which includes access via the strategic highway and rail network, plus the coastal tramway.	The Applicants note the response.
REP1-078 13.2.1	<i>BAe System Sites</i> Fylde is unusual in that there is a dominance of manufacturing employment (approximately 40%) with approximately 50% of workers commuting into the area. Most of these manufacturing jobs are based in the south of the borough at BAE Systems, Warton and Westinghouse, Salwick.	The Applicants note the response.
REP1-078 13.2.2	BAe Systems also has another site at Samlesbury just east of Preston and workers are often contracted to work at both sites, many therefore live in the wider Preston area. BAE Systems also attracts workers from much further afield, both nationally and internationally. (FLP Section 2.15)	The Applicants note the response.
REP1-078 13.2.3	The internationally and nationally significant Lancashire Enterprise Zone has been established jointly at BAE Systems, Warton and at BAE Systems, Samlesbury. The Lancashire Enterprise Zone at BAE Systems, Warton is focused on advanced engineering and	The Applicants note the response.

Reference	Written Representation Comment	Applicants' response
	manufacturing (AEM) including aerospace, automotive, nuclear and new growth areas including energy.	
REP1-078 13.3.1	<i>Blackpool Airport and Enterprise Zone</i> FLP Policy EC4 relates to the Blackpool Airport Enterprise Zone which makes land available for economic development purposes, including the area designated site ES5 by FLP Policy EC1 for employment uses following the relocation of aviation uses further onto the apron area. A masterplan has been produced under Policy EC4 which identified site ES5 as the "Knowledge Quarter".	The Applicants note the response. Strategic Policy EC4 has been considered within ES Volume 4, Chapter 2: Socio-economics (APP-141) – see Table 2.7.
REP1-078 13.3.2	FLP Policy T3 states that the land designated as Green Belt within the airport will be safeguarded from non-airport development, unless there are overriding operational requirements that constitute Very Special Circumstances and which justifies development in the Green Belt. This also requires development to be in accordance with the masterplan and includes a requirement to consult Blackpool Airport in relation to all developments within the safeguarding zone and implies that the views offered by Blackpool Airport should carry weight in assessing policy compliance.	The Applicants refer FBC to Volume 1, Annex 4.3: Selection and Refinement of the Onshore Infrastructure (APP-033). The Applicants have engaged with Blackpool Airport and are in ongoing discussions in relation to the safeguarding zone.
REP1-078 13.3.3	A specific issue arising from the dDCO is that work areas 34A and 34B provide for permanent access on a specified route within the Enterprise Zone and across the crosswind runway. However, no clarity is provided on how to replan site ES5 will be addressed. This is raised as it is not simply a matter of dDCO drafting but rather relates to the extent and location of the proposed works, in this case conflicting with a specific allocation within FLP. That is to say that redrafting the DCO will not resolve this issue, as the proposals are relying on land which falls within the area allocated in the Local Plan. In FBC view there is a conflict between these elements and although FBC acknowledges that Blackpool Council	The northern access route through Blackpool Airport is identified as Work No. 34A34B on the Works Plans – Onshore and Intertidal Part 1 of 2 (AS-016). Work No. 34A34B is for permanent access including creation and improvement of access to highway and works to visibility splays as defined in Schedule 1 Part 1 Authorised Development of the draft DCO (C1/F04). The northern access route through Blackpool Airport is an operational access. The Project Description (F1.3/F03) states that no construction is proposed for operational accesses. Operational accesses for the onshore export cable corridor and 400kV grid connection cable corridor would typically be accessed using a Light Goods Vehicle or other 4x4 or multi-terrain vehicle. However, no vehicles are proposed to be used along PRoWs or bridleways for operation and maintenance activities. The Applicants

Reference	Written Representation Comment	Applicants' response
	would lead on this matter, it does give rise to material impacts with regards to the FLP.	<p>response to ISH1_38 within REP1-037 states the vehicle movements associated with the planned operation and maintenance hours will be updated from 07:00 – 23:00 to 07:00 – 19:00. An update to the Commitments Register (F 1.5.3/F03) submitted at Deadline 2.</p> <p>The use of the northern access route and how this can be incorporated into site ES5 is one of the matters currently under discussion with Blackpool Airport and Blackpool Council.</p>
REP1-078 13.4.1	<p><i>St Annes Old Links Golf Course</i></p> <p>Matters relating specifically to impacts at St Annes Old Links Golf Course are discussed in more detail under the 'Human Health and Recreation' heading in this LIR. In summary, the likely impacts that the development could undermine the Council's protections for the Links Golf Course as set out in FLP Policy EC6.</p>	<p>The Applicants refer Fylde Borough Council to their response above to REP1-078 10.5.4 which confirms that there will be no breakout points along the trenchless installation and thus no potential impacts to the function of the golf course.</p> <p>This in turn means that the Council's protections for the St Annes Old Links Golf Course under Policy EC6 will not be impacted.</p>
REP1-078 13.5.1	<p><i>Foreshore and Dunes</i></p> <p>In addition to restrictions arising from the Ribble and Alt Estuaries SPA and Ramsar site, and the Lytham St Anne's Dunes SSSI, the beach and dunes perform a very important function in terms of the visitor economy. FLP Policy EC6 sets out a specific requirement for the Council to promote beach leisure activities and coastal tourism, in recognition of the vital role that coastal tourism plays in underpinning the local economy.</p>	<p>The Applicants have committed to ensure public access to the east of the works areas will be maintained during construction. This will ensure that areas to the north and south of the works area would remain accessible for beach-based activities. The Applicants have sought to minimise the duration of beach works by committing to a direct pipe trenchless installation technique in order to limit potential disruption to users of the beach and an Outline Open Space Management Plan has been appended to the Outline Public Rights of Way Management Plan (AS-048), which includes measures to minimise potential impacts</p>
REP1-078 13.5.2	<p>The build-out phases of the development have significant potential to impact access to the foreshore and dunes. The applicants ES does not include details of the timing, phasing, duration, frequency and nature of the restrictions on access to the beach that would arise.</p>	<p>The Applicants refer Fylde Borough Council to Volume 1, Chapter 3 (F1.3/F03, AS-024) and Annex 5.3 to the Applicants response to Hearing Action Points: ISH1 13, 14, 16, 17 (REP1-040) which provides further detail on the trenchless technique crossing.</p>

Reference	Written Representation Comment	Applicants' response
REP1-078 13.5.3	It is noted that the ExA have requested additional information from the applicants which would set out access management details. Without this information, the likely impacts can only be assessed as having the potential to harm the vital role that coastal tourism plays in the area.	The Applicants refer Fylde Borough Council to REP1-078 13.5.1 regarding Policy EC6.
REP1-078 13.5.4	A further specific issue relating to the access management plan not addressed in the submission and not raised during the ExA questions during the first week of hearing sessions relates to the Royal National Lifeboat Institution [RNLI].	The Applicants note this comment and have responded in row REP1-078 13.5.4 below. The Applicants met with the RNLI on 12 May 2025 to discuss this matter and explained that the slipway will not be fenced, gated or otherwise obstructed and will be used simply for vessel launch in support of cable landfall works and for vehicle access to the beach as necessary. The Applicants also confirmed that in the event of an emergency, RNLI vehicles and vessels will be prioritised by the Applicants contractors. The Applicants committed to updating the outline communications plan (APP-194) at Deadline 3 to include RNLI. The RNLI written representation (REP1-069) recognises this additional information and commitment, and on that basis the RNLI written representation confirms that initial concerns around access to the slipway have been allayed.
REP1-078 13.5.5	The RNLI submitted Relevant Representations [RR-1899] in which it is set out that the lack of detail in the submission means that the potential impacts cannot be properly assessed and managed. Specifically, the slipway at Starr Gate is close to the works order area and there are concerns that access could be restricted. Whilst this falls outside of the FBC area, the impacts are relevant in that this slipway is at times used in relation to rescue and recovery right along the length of Fylde coast with lifeboats transported across the whole extent of the beach. FBC therefore considers any works and structures could have an operational impact on this service which has not been assessed.	The RNLI written representation does raise additional matters relating to access to vessel launch sites and working arrangements during export cable pull-in activity during nighttime and, or periods of poor visibility. The Applicants have responded to these matters at Deadline 2 (S_D2_3) and intend to secure a meeting with RNLI in the coming weeks to discuss the RNLI written representation and the Applicants response, with the aim of providing an update at Deadline 3.
REP1-078 13.5.6	The likely impact for assessment therefore is severe, in that the potential impacts cannot be properly understood and managed and could harm the availability and effectiveness of an emergency service, resulting in increased risk to life and wellbeing.	
REP1-078 13.6.1	<i>Blackpool Road Playing Fields</i> Matters relating specifically to impacts at Blackpool Road Playing Fields are discussed in more detail under the 'Human Health and Recreation' heading later in this LIR.	Response provided in the 'Human Health and Recreation' section.

Reference	Written Representation Comment	Applicants' response
REP1-078 13.6.2	However in summary, the likely impacts are that loss of sports pitches without permanent compensatory provision would be in direct contravention to FLP Policies HW3, HW1 and ENV3; it would also be contrary to NPPF paragraphs 96, 98 and 104.	Response provided in the 'Human Health and Recreation' section. The Planning Statement (REP1-032) and Local Planning Policy Tracker (APP-236) set out those policies the Applicants deemed of relevance to the proposals. Both these documents are to be updated for Deadline 6.
REP1-078 13.7.1	<i>Agriculture</i> Specific matters and impacts relating to agricultural business impacts are discussed in more detail under the 'Agricultural Land' heading earlier in this LIR. In summary, the likely impacts of the development and disruption would be to harm agricultural land holdings and rural businesses in Fylde.	Refer to the Applicants' response on Agricultural Land.
REP1-078 13.8.1	<i>Local Business and Tourism Likely Impacts Summary</i> The rural landscape and attractive coastline attract many tourists to the area. FLP Section 8.22 (supporting text to Policy EC2) observes that alongside sustainable development, it is important to maintain the rural economy. At a high level, the likely impact of the proposed development is it will cause temporary and permanent harm to businesses and tourism, in a such a way that will impact sustaining and creating jobs.	Potential effects on socio-economics and tourism have been assessed within Volume 4, Chapter 2: Socio-economics (APP-141) and clarified within S_D1_5.10 Annex 5.10 to the Applicants response to Hearing Action Points: ISH1 52 - Rev F01 (REP1-046). Section 2.12 of ES Volume 4, Chapter 2: Socio-economics (APP-141) considers the assessment of onshore effects. This concludes minor beneficial effects on economic receptors including employment and GVA, with negligible effects on Blackpool Airport, Blackpool Airport Enterprise Zone and tourism receptors. Hearing Action Point: ISH1 53 requested Fylde Council to "provide evidence of where projects of this kind have had an impact on the tourism economy". No response was provided by Fylde Council on this Hearing Action Point. In preparation of ES Volume 4, Chapter 2: Socio-economics, and in preparation of S_D1_5.10 Annex 5.10 to the Applicants response to Hearing Action Points: ISH1 52 - Rev F01 (REP1-046), the Applicants have gathered the relevant publicly available evidence on the impact of energy infrastructure projects on tourism. There is no evidence to justify an assessment that significant permanent harm to tourism is likely.

Reference	Written Representation Comment	Applicants' response
REP1-078 13.8.2	The likely impact of the lack of detail around timing, duration and frequency, is that these impacts will be increased without justification. Specifically with regards to timing, these matters and in particular tourism are seasonal in nature and harm could be mitigated by planning around busy periods and events. The dDCO has limited detail in this regard and would allow for a wide range of potential development scenarios over an extended period of time, with the possibility of permanent harm being caused.	The Applicants note the concerns of FBC with regard to tourism, however we consider there is no justification to conclude that the likely effect of any lack of detail (which the Applicants maintain in any event, is not the case) around timing, duration and frequency is that impacts will be increased. The scale, nature, likelihood or permanence of any impact would not necessarily alter. Table 2.31 of Volume 4, Chapter 2: Socio-economics (APP-141) sets out the maximum design scenario that was assessed in order to determine the potential impacts on tourism. The assessment on tourism was undertaken on the basis of the greatest impact duration. The maximum impact on tourism receptors is therefore estimated to occur under a sequential construction scenario (Please see Rule 9 - ES assessment of Construction Scenarios (AS-070)).
REP1-078 13.8.3	As discussed for example with reference to Warton Aerodrome, Blackpool Airport and agriculture, no assessments have been undertaken to assess the potential impacts on large strategically important specialist businesses, including their supplies chains, employability and potential effects on the local and regional economies.	<p>There is no statutory guidance available that recommends assessment of impacts on individual businesses in any sector. EIA analysis at the level of individual businesses would likely mean that all conclusions on effects, whether beneficial or adverse, would be significant on all projects because of the effects to some particularly sensitive individual business. This would be contrary to supporting decision-makers in identifying the material issues. Assessment of EIA significance at the level of individual businesses is therefore not proportionate.</p> <p>This principle aligns with advice set out by the Institute of Environmental Management and Assessment (IEMA) on the interrelated topic of human health and assessing effects on individuals.</p> <p>The likely effects in regards to socio-economics on Blackpool Airport and Blackpool Airport Enterprise Zone are assessed within Volume 4, Chapter 2: Socio-economics (APP-141), section 2.12.4. The assessment has been prepared in response to both (a) the potential for aviation impacts being identified within ES Volume 3, Chapter 11: Aviation and radar (APP-130), and (b) s42 consultation responses (see Table 2.8 of APP-141).</p> <p>The potential socio-economic effects on Warton Aerodrome have not been assessed on the basis that (a) this was scoped out of ES Volume 3, Chapter 11: Aviation and radar (APP-130) and (b) no representations were made by</p>

Reference	Written Representation Comment	Applicants' response
		<p>stakeholders at either scoping or s42 to assess the potential socio-economic effects on Warton Aerodrome.</p> <p>The impact of the Transmission Assets on agricultural land holdings are considered in Volume 3, Chapter 6: Land use and recreation (APP-104)</p>
REP1-078 13.8.4	FBC acknowledges whilst these effects are likely to occur during the construction/ decommissioning phases of the development. The lack of broad parameters relating to construction phasing in the ES is a concern. FBC considers the basis of the economic assessment and associated impacts inadequate.	<p>Potential effects on socio-economics and tourism have been assessed within Volume 4, Chapter 2: Socio-economics (APP-141) on the basis that effects are likely to occur during the construction/decommissioning phases, in accordance with the best available and latest industry guidance and evidence. As set out within paragraph 2.9.1.2 of APP-141, economic receptors are assessed on the basis of 'peak' impacts representing the maximum impact, which would occur under a concurrent construction scenario.</p> <p>In addition, Requirement 3 of Schedules 2A and 2B of the draft Development Consent Order (C1/F04) states that works may not be commenced until notification has been submitted to the relevant planning authority detailing whether the Project onshore works and intertidal works will be constructed in a single stage or in two or more stages. However, the requirement also states that the stages of construction will not permit Project A to be constructed in more than one overall phase.</p>
REP1-078 13.8.5	The FLP policies relating to ecology recognise the delicate nature of local environment with Policy ENV1 requiring that development would not detract from the tourism value or facilities along the coastline. All businesses small and large across all sectors benefit from the ability to plan to mitigate the range of impacts which can arise from disruption.	The Applicants note the response. Tourism effects have been assessed within Volume 4, Chapter 2: Socio-economics (APP-141). Effects on any tourism facilities along the coastline are assessed as not significant within the context of the tourism study area.
REP1-078 13.8.6	It is possible the proposal would likely deliver some positive impacts in terms of local employment and training, particularly during the build-out and decommissioning phases and in terms of management and maintenance during operation. However, beyond a very high-level observation in this regard, the ES does	<p>It is agreed that there is the potential to deliver positive impacts from the Transmission Assets and the wider development of the Morgan and Morecambe offshore wind farms in terms of local employment and training.</p> <p>The Outline Employment & Skills Plan (OESP) (APP-239) provides a specific strategy establishing the high level approach to support positive local</p>

Reference	Written Representation Comment	Applicants' response
	not include specific strategies which would ensure that this positive impact and related social value commitments are not properly articulated and adequately captured	employment, training and employment impacts included in the DCO application. The OESP will form the basis of detailed Employment and Skills Plans which will be prepared in consultation with local stakeholders to ensure actions respond to local needs. The preparation of these detailed plans in accordance with the OESP is set out within Requirement 19 (Employment and Skills Plan) in Schedules 2A and 2B of the draft DCO (C1/F04). This is cited within the ES Volume 4, Chapter 2: Socio-economics (APP-141) at Table 2.29.
Risk Management and Resilience		
REP1-078 14.1.1	<i>Introduction</i> FBC recognises the strategic importance of renewable energy infrastructure. However, large infrastructure projects of this scale inevitably introduce a range of risks to the local environment, businesses, community and service resilience, particularly during the construction and decommissioning phases.	The Applicants note the response
REP1-078 14.1.2	It is essential that such risks are not inadvertently defaulted to the local authority or local responders without appropriate resource, responsibility, or commitment from the applicant. FBC considers that there are four principal areas of concern, as set out below: <ul style="list-style-type: none"> • Flood Risk and Water Management • Emergence Preparedness and Incident Response • Supply Chain, Contractor and Business Continuity Risks • Monitoring and Reporting 	Risk Management is a multi-disciplinary topic however is covered within the following documentation: <ul style="list-style-type: none"> • Volume 3, Chapter 2: Hydrology and Flood Risk (APP-070); • Outline Spillage and Emergency Response Plan (AS-046) • Code of Construction Practice (APP-193).
REP1-078 14.2.1	<i>Flood Risk and Water Management</i> The submitted Flood Risk Assessment [APP-074] acknowledges that elements of the project lie within Flood Zones 2 and 3 and identifies a number of surface water flood risks, including at onshore substations and along cable corridors. The applicants approach relies heavily on:	The Applicants note the response

Reference	Written Representation Comment	Applicants' response
	<ul style="list-style-type: none"> Existing Environment Agency flood defences (some with unknown ownership, condition, or design standard of protection); Assumptions of “natural high ground” acting as flood barriers; and, Static climate change modelling (UKCP19 allowances) without dynamic reassessment mechanisms. 	
REP1-078 14.2.2	The dDCO does not include a commitment to adaptive management or periodic review of flood risk post-consent. The applicant has not clarified responsibility for monitoring or maintaining third-party assets that their flood risk mitigation relies upon. Furthermore, construction-phase flooding risks, especially temporary works and haul roads, may introduce unmanaged disruption without clear contingency planning.	The Applicants refer FBC to their response in Procedural Deadline A Submission – RR-1262.9 (PDA-012) with regards to flood risk during construction and operations.
REP1-078 14.2.3	In FBC view the likely impact of this approach is that there would be unmanaged and increased likelihood of issues arising from flooding, and disruption to businesses without exploration justification and control.	The Applicants refer FBC to their response in Procedural Deadline A Submission – RR-1262.9 (PDA-012) with regards to flood risk during construction and operations.
REP1-078 14.3.1	<p><i>Emergency Preparedness and Incident Response</i></p> <p>The applicant has provided an Outline Spillage and Emergency Response Plan [AS046-047]. Whilst this document is outline, it omits certain details which is required to properly understand the likely impacts of the development. This includes the mission of:</p> <ul style="list-style-type: none"> Site-specific risk scenarios; Defined incident leadership, ownership and escalation pathways; Formal integration with the Lancashire Resilience Forum, Fylde Borough Council, or other relevant responders; and, 	The Applicants note the response.

Reference	Written Representation Comment	Applicants' response
	<ul style="list-style-type: none"> Any reference to performance standards, such as response times, equipment readiness, or resource availability. 	
REP1-078 14.3.2	The reliance upon generic guidance is not sufficient for a dDCO, or ES Assessment. The likely impacts are that requirements and limitations around emergency preparedness and incident response have not been properly understood, and therefore in FBC view have not been adequately assessed and as part of resilience/risk management procurement and design.	As part of the application the Applicants have prepared and submitted an Outline Spillage and Emergency Response Plan (APP-201). The Outline Spillage and Emergency Response Plan forms an appendix to the Outline Code of Construction Practice (APP-193). This is secured in the draft Development Consent Order (DCO) (C1/F04) through Requirement 8 (Code of Construction Practice).
REP1-078 14.4.1	<p><i>Supply Chain, Contractor and Business Continuity Risks</i></p> <p>The applicants have submitted a Commitments Register [AS-030] which defers controls such as spillage prevention, pollution control and emergency planning to future detailed design. However, as part of this initial assessment, there is no clear evidence of consideration of the need for supply chain resilience assessments; business continuity arrangements for contractor and subcontractor failure; or, contingency measures should critical infrastructure fail.</p>	The Applicants have robust procurement processes in place to complete due diligence on potential bidders and any award would be subject to thorough evaluation of a potential contractor's capabilities, experience (including local experience) to enable the Applicants to select the most appropriate contractor for the work. The project's standard contracts have clear and well-defined mechanisms in place to manage contractor viability and performance risks, along with the management of sub-contractors. These contracts give the project the ability to change contractors or subcontractors should the need arise (for operational, financial or performance grounds).
REP1-078 14.4.2	As FBC understands it, no principal/tier 1 contractors have been appointed, therefore limited design input therefore into design parameters which is a recognised best practice for large scale infrastructure procurement. FBC have raised this matter directly with the applicants. However, at this stage this remains a significant risk which has not been properly assessed in terms of impacts. It is unclear to FBC what contingencies have been modelled in relation to contractor involvement in design and operation processes.	The Applicants have undertaken a range of survey and early engineering studies with specialist contractors to inform the underlying basis for the project's design envelope and overarching requirements for the project. Prior to the award of execution contracts, the Applicants will complete early engineering contracts with relevant contractors to inform front end engineering definition and enable all parties to have a comprehensive understanding of the scope prior to award of execution contracts and in turn ensure the Applicants selects the right bidder with relevant capabilities and experience to deliver the scope.
REP1-078	The likely impacts of these omissions are there could be delayed or ineffective response to serious incidents, with potential harmful	The Applicants do not agree that there could be a delay or ineffective response to serious incidents as evidenced in involvement of both

Reference	Written Representation Comment	Applicants' response
14.4.3	impacts on local services, businesses and the Fylde's economy. Changes in design through the procurement process could have additional effects. This is understood but what is not clear is how these risks have been assessed.	<p>experienced developers and (at certain points in the development process) contractors (see REP1-078 14.4.2).</p> <p>The Applicants' processes are intended to award to the right bidder with relevant capabilities and experience for this type of development (ie. Tier 1 contractors who have successfully completed other transmission scopes in the UK and in the North West with proven track record for managing the uncertainty, delivering the scope and working with communities and stakeholders successfully). Clear protocols will be in place for incident management as well as strict conditions of contract requiring compliance with consent which obviously includes design parameters within the Maximum Design Scenario (MDS). The project also operates a management of change process to ensure that any changes in design are clearly assessed and understood across the project.</p>
REP1-078 14.4.4	As noted, there are a number of important regional/national/international businesses and supply chains located on the Fylde peninsula. These businesses have specific requirements when it comes to managing resilience. It is unclear whether these matters have been understood and assessed by the applicants. The lack of involvement gives rise to an increased likelihood of design changes with resultant impacts on assessment processes.	The Applicants acknowledge that there are a number of important businesses within Fylde, as set out within Volume 4, Chapter 2: Socio-economics (APP-141). On the basis of proportionality, an assessment of potential impacts individual businesses not been considered within the assessment. However, specific consideration has been given within the assessment to the range of businesses within Blackpool Airport and Blackpool Airport Enterprise Zone (see section 2.6.4 of APP-141).
REP1-078 14.5.1	<p><i>Monitoring, Reporting and Decommissioning</i></p> <p>The applicants have provided no details of or commitment to ongoing risk monitoring or reporting post-consent and/or decommissioning processes. The likely impact is that there would be a reduced ability to adapt to emerging risks such as climate change, market shift, innovation and technology improvements.</p>	The Applicants note Fylde Borough Councils comment.
REP1-078 14.6.1	<p><i>Risk Management and Resilience Summary</i></p> <p>FBC acknowledges the intention set out by the applicant to address environmental and community risks and that design is an</p>	The Applicants note the comment and will engage further with the Council to understand their concerns on this matter.

Reference	Written Representation Comment	Applicants' response
	iterative process. However FBC considers that the current proposals lack sufficient detail, assessment and control as evidenced in key areas.	
REP1-078 14.6.2	The likely impacts of the development would be that the risks associated with the project would not be properly owned, managed and resourced by the applicants. This in turn would likely give rise to harmful impacts on the local authority, local emergency services, economy, environment and communities and businesses.	
Human Health and Recreation		
REP1-078 15.1.1	<i>Introduction</i> NPPF Section 8 concerns promoting healthy and safe communities, setting out a general requirement for decisions to aim to achieve healthy places. Specifically, NPPF Paragraph 98 includes that decisions should take into account and support the delivery of local strategies to improve health. FLP Section 10.5 sets out that there is a general need to maintain levels of physical activity in adults and children and notes that the area houses a high proportion of people aged over 65, with some not in good health.	Noted. Volume 1, Annex 5.1: Human health (APP-035) Section 1.2 summarises relevant policy including NPPF Section 8 and the Fylde Local Plan. It is agreed that there are policy drivers in relation to population health. Volume 1, Annex 5.1: Human health (APP-035), Section 1.7.3 summarises relevant population health statistics, including relevant to levels of physical activity in adults and children. The presence of vulnerable groups, including children, people aged over 65 and people who are not in good health have been taken into account by the assessment (see section 1.11.5). It is agreed that these groups are present, and this has been taken into account in reaching the conclusion that there would not be significant adverse population health effects, including for such vulnerable groups. A conclusion with which the UK Health Security Agency and the Department of Health's Office for Health Improvement and Disparities agree (AS-061).
REP1-078 15.2.1	<i>Public Rights of Way</i> As well as setting out general principles and strategies relating to healthcare provision, FLP Policy HW1 includes a specific requirement to promote healthy lifestyles and to develop a network of cycling and pedestrian routes. The proposal would impact upon 21 Public Rights of Way within Fylde.	The Applicants will manage and maintain access to the existing Public Rights of Way (PRoW) network during construction (CoT91 of Volume 1, Annex 5.3: Commitments Register of the ES (F 1.5.3/F03)). No PRoW will be permanently closed as a result of the construction, operation and maintenance or decommissioning of the Transmission Assets. To manage the potential impacts of construction, the Applicants will apply the measures

Reference	Written Representation Comment	Applicants' response
REP1-078 15.2.2	The submitted Outline Public Rights of Way Management Plan [APP-106] sets out that trenchless techniques, managed crossings and temporary diversions would be used. However, there would be permanent impacts to footpaths close to the Morecambe Substation in the form of a gated crossing. The outline management plan further sets out that the majority of impacts would be mitigated as a result of trenchless techniques being employed, with no further action required.	<p>described in the Outline PRow Plan (AS-048). For the majority of the PRow intersected by the Onshore Order Limits, it is proposed that these will remain open with appropriate signage (i.e. managed crossings) to warn of the presence of construction vehicles, and to warn of the presence of walkers, cyclists and horse riders. These managed crossings of PRow will be fenced off with gated crossing points and temporary site fencing to prevent the public from accessing the PRow, when access would need to be managed. Where there is a specific requirement to maintain the access, a suitable route will be clearly marked out to aid safe passage. Where such crossings are installed, a gap will be left in the topsoil bunds after the topsoil has been stripped within the onshore export cable corridors. The measures to be implemented as part of the PRow Management Strategy seek to minimise impacts on public footpaths, bridleways and other promoted routes (e.g. National Cycle Routes (NCRs), Long Distance Footpaths) during construction of the Transmission Assets. The detailed Public Right of Way Management Plan(s), which will be developed in accordance with the outline Public Rights of Way Management Plan (AS-048), and which forms part of the detailed Code of Construction Practice(s). The detailed CoCP(s) are secured by Requirement 8 of Schedules 2A and 2B of the draft DCO (C1/F04). Detailed Public Right of Way Plan(s) will be implemented as approved by the relevant local planning authority. The Outline Public Rights of Way (PRow) Management Plan (AS-048) confirms arrangements in relation to temporary diversions (section 1.5.6) and surface reinstatement (section 1.5.8). This will be brought forward in detailed PRow Management Plan(s) secured by Requirement 8 of Schedules 2A & 2B of the draft DCO (C1/F04).</p> <p>Volume 1, Annex 5.1: Human health (APP-035) considers transport modes, access and connections (section 1.12.2), open space, leisure and play (section 1.12.3) and air quality (section 1.12.5) human health effects from the Transmission Assets. It concludes the Transmission Assets should not result in any significant adverse impact on public health, including for vulnerable groups. That assessment includes Lytham St Annes as part of the local population of Fylde. This conclusion applies to impacts relating to:</p>

Reference	Written Representation Comment	Applicants' response
		<ul style="list-style-type: none"> temporary disruption to active travel; dust effects from construction and decommissioning activities and construction compounds, as well as vehicle emissions from construction traffic; and temporary disruption in access to green (land) and blue (water) public open spaces. <p>The UK Health Security Agency and the Department of Health's Office for Health Improvement and Disparities have reviewed the assessment and state that they agree with the methods and that they are satisfied that the proposed development should not result in any significant adverse impact on public health (AS-061).</p>
REP1-078 15.2.3	However, the ES is not based upon a proper assessment of the timing, duration and frequency of these impacts, nor considers subsequent controls to ensure harm is minimised. As a result, rather than contributing to the development of networked cycling and pedestrian routes to support a healthy lifestyle, the development could likely cause harm to the function of the existing networks over a long period of time, giving rise to harmful health, accessibility and economic impacts.	<p>This is not agreed. The ES is based on a robust and appropriate assessment that takes into account parameters relating to the timing, duration and frequency of impacts. There is no requirement to have exact timetabling of impacts, and it would be disproportionate to expect this to be the case.</p> <p>Volume 1, Chapter 3: Project Description (F1.3/F03) Section 3.9 sets out the programme and construction scenarios that form the broad basis for assessing the duration of effects. As stated at paragraph 3.9.2.1 "<i>a range of construction scenarios have been identified as the exact timings for construction for each of the offshore wind farms is still unknown</i>". Additional detail is set out in Volume 3, Chapter 6: Land use and recreation (APP-104) Table 6.18, which provides maximum design scenarios for specific activities, including durations. Volume 1, Annex 5.1: Human health (APP-035) Table 1.23 characterises magnitude of change, including with reference to duration and frequency, following the Institute of Environmental Management and Assessment (IEMA) guide: Determining Significance for Human Health in Environmental Impact Assessment. The UK Health Security Agency and the Department of Health's Office for Health Improvement and Disparities have reviewed the assessment and state that they agree with the methods and</p>

Reference	Written Representation Comment	Applicants' response
		that they are satisfied that the proposed development should not result in any significant adverse impact on public health (AS-061). Appropriate mitigation measures to reduce, wherever possible, effects on PRow are proposed in the Outline PRow Management Plan (AS-048) and in the Open Spaces in the Outline Open Space Management Plan, Annex A to AS-048).
REP1-078 15.3.1	<i>Playing Pitches</i> FLP Policy ENV3 protects open space including sports and playing pitches and cross-refers with national policies. NPPF paragraph 104 protects sports pitches unless they are demonstrably surplus, replaced by equivalent or better provision or the development is for alternative sports use.	The Applicants note the response
REP1-078 15.3.2	Policy HW3 Protection and Provision of Indoor and Outdoor Sports Facilities protects indoor and outdoor sports facilities unless the tests in the NPPF are met. Paragraph 98 of the NPPF states that decisions should guard against the unnecessary loss of valued recreational facilities.	The Applicants note the response
REP1-078 15.3.3	The proposed development would utilise two areas of Blackpool Road Playing Fields under works areas 51A, 51B, 53A and 53B to provide construction compounds and permanent access, as well as cabling that could be laid with open trenching, resulting in the loss of sports pitches.	Please refer to section 1.4 of Annex 5.4 to the Applicants response to Hearing Action Points: ISH1 18 Blackpool Road Recreation Ground - Summary of impacts - Rev F01 (REP1-041) which sets out the measures adopted with regards to the Blackpool Road Recreation Ground.
REP1-078 15.3.4	The dDCO includes no commitment to restoring these pitches and insufficient details to understand whether the permanent access requirements would be compatible with the ongoing use of the site for sport and its effects on the community.	The Applicants have made a commitment (CoT08 of Volume 1, Annex 5.3 of the Environmental Statement (F 1.5.3/F03) to reinstate the cable working area post construction to its pre-existing condition as far as reasonably practical in line with relevant guidance. This is secured via article 29 and Requirement 16 of Schedules 2A & 2B of the draft DCO (C1/F04) and applies to the Recreation Ground as well as other land within the Order Limits (see also response to REP1-078 4.4.1)

Reference	Written Representation Comment	Applicants' response
REP1-078 15.3.5	Importantly this is not considered to be an issue which could be addressed by appropriate drafting of the DCO but rather relates to fundamental issues in terms of the location and nature of the proposed development. As the Blackpool Road site is an important site for local participation in sport: it is the base for St Annes FBC (which has 46 teams) as well as other clubs operating there.	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)). The Applicants are continuing to proactively engage with Fylde Borough Council and St Annes Football Club to further develop the mitigation options.
REP1-078 15.3.6	FBC has programmed a scheme to improve drainage on the Blackpool Road site; the existence of the current proposal will create a difficulty for the Council in assessing whether it should press ahead with the scheme, or abandon it pending the outcome of the application or the completion of the cabling. The prolonged period allowed for potential construction significantly compounds this. Whilst FBC understand that the applicant is in talks with representatives of the sports clubs, FBC also has an interest and landowner and in terms of the Local Plan requirements.	The Applicants are aware of the drainage scheme due to conversations with Fylde Borough Council and St Annes FC. However, the Applicants will continue to proactively engage on this matter with them further.
REP1-078 15.3.7	Whilst it is acknowledged that Sport England is a non-statutory consultee for NSIPs, it is listed as being a non-prescribed consultee under the Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009, described as being a relevant organisation. On this basis, FBC has been further guided by Sport England, who have raised objection to the proposals.	The Applicants reiterate that Sport England are not a statutory consultee under the Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009 (the Regulations) and the Regulations do not provide a list for non-prescribed consultees. As noted in the Applicants' Hearing Summary of the Issue Specific Hearing 1: Day 1 Rev F01(REP1-034), the Applicants would, however, welcome any engagement from Sport England.
REP1-078 15.3.8	While a pragmatic approach could be taken to temporary impacts on playing fields, the acceptability of such proposals should be assessed on a case-by-case basis and will depend on the scope of the impact, its duration and the acceptability of any temporary	Volume 1, Annex 5.1: Human health (APP-035) Section 1.12.3 specifically discusses the temporary disruption to Blackpool Road Recreation Grounds. Paragraphs 1.12.3.15 to 1.12.3.17 discussion how the health assessment inputted to the refinement of construction techniques, including adoption of a

Reference	Written Representation Comment	Applicants' response
	mitigation proposals. If the affected areas of the existing playing fields are to be retained and restored post completion of the proposed works, then as part of any forthcoming submission documents the applicant should provide an agronomy report and full plan of works.	<p>'trenchless' rather than an 'open-cut trench' approach to reduce the area and duration of disruption to recreational use of the grounds.</p> <p>The human health assessment concludes the 'Transmission Assets' should not result in any significant adverse impact on public health, including for vulnerable groups. The UK Health Security Agency and the Department of Health's Office for Health Improvement and Disparities have reviewed the assessment and state that they agree with the methods and that they are satisfied that the proposed development should not result in any significant adverse impact on public health (AS-061).</p> <p>An outline Open Space Management Plan is included at Annex A to AS-48, which includes the commitment to the implementation of detailed Open Space Management Plan(s) secured in Requirement 8 of the draft DCO Schedules 2A and 2B (C1/F04). Section 1.2.2.9 states in relation to the playing fields that measures will be "agreed with the relevant local authorities, as well as other relevant stakeholders".</p>
REP1-078 15.3.9	This work should also include an implementation timeframe for the pitch restoration works to be completed. The applicants should also provide details of the continuity of the existing sports use of/on the affected playing field and provide a scheme detailing the alternative provision for where these teams will play during the construction process. And should set out details of the size, location, type and make-up of the facilities or replacement facilities (as appropriate) together with arrangements for access.	Section 1.4 of Annex 5.4 to the Applicants response to Hearing Action Points: ISH1 18 Blackpool Road Recreation Ground - Summary of impacts - Rev F01 (REP1-041) notes that the Applicants will secure mitigation for the construction activities at Blackpool Road Recreation Ground via a section 106 agreement. The Applicants have been engaging on this and the matters raised here with Fylde Borough Council.
REP1-078 15.3.10	The scheme must include a timetable for the provision of the facilities or replacement facilities (as appropriate). Without this information, it is not possible to properly assess the likely impacts of the development. There is clear potential for significant harm to be caused. The loss of sports pitches without permanent compensatory provision would be in direct contravention to FLP Policies HW3, HW1 and ENV3; it would also be contrary to NPPF paragraphs 96, 98 and 104.	<p>The Applicants refer to the response provided above to REP1-078 15.3.5.</p> <p>However, the Applicants would like to confirm to Fylde Borough Council that the appropriate mitigation will be in place as agreed within the S106 prior to the commencement of construction at Blackpool Road Recreation Ground.</p>

Reference	Written Representation Comment	Applicants' response
REP1-078 15.4.1	<i>St Annes Old Links Golf Course</i> FLP Policy EC6 provides specific protection for golf courses. St Annes Old Links Golf Course is a championship golf course, having hosted the final qualifying for The Open on several occasions and as recently as 2022.	The Applicants note this response.
REP1-078 15.4.2	The golf course is a key contributor to appeal of the local area for recreational golf, business and tourism, this includes the Royal Lytham & St Annes Golf Club which is one of the courses in the Open Championship rotation and is hosting the Women's Open Championship next year.	The draft DCO (C1/F04) will only grant the Applicants rights to work and use trenchless construction techniques at Work No.s 8A and 8B, which would be monitored by access on foot, to avoid any disruption or impact to the Golf Club as a result of cable installation works. This is secured within Schedule 1 and further secured in Schedules 8A and 8B (19. Cable rights at St Anne's Old Links Golf Course and Blackpool Road Recreation Ground).
REP1-078 15.4.3	The works proposed under works areas 8A and 8B involve underground tunnelling or trenchless construction. The dDCO is not restrictive enough in terms of ensuring underground tunnelling or trenchless construction are used. FBC acknowledges that this issue could be addressed by redrafting the DCO but has reservations about whether this would be possible, with reference to proposed permissive approach to construction which the applicant is seeking as well as ES assessment and policy considerations.	<p>The works descriptions within the draft DCO (C1/F04) for Work Nos 8A and 8B are set out below:</p> <p><i>Work No. 8A - Morgan onshore cable works at St Anne's Old Links golf course including— (a) up to four cable circuits and associated cable ducts between Work No. 6A and Work No. 9A laid underground by trenchless installation technique works or direct pipe works; and (b) construction access.</i></p> <p><i>Work No. 8B – Morecambe onshore cable works at St Anne's Old Links golf course including— (a) up to two cable circuits and associated cable ducts between Work No. 6B and Work No. 9B laid underground by trenchless installation technique works or direct pipe works; and (b) construction access.</i></p> <p>As this prescribes that the cable installation in these works can only be 'by trenchless installation techniques or direct pipe works' (another trenchless technique as defined in the draft DCO(C1/F04)), the Applicants are restricted to this through the DCO.</p>
REP1-078 15.4.4	Additionally, the overall length of underground boring through this and the adjacent work areas 6A, 6B, 9A and 9B is significant and it	The Applicants refer Fylde Borough Council to their response above to REP1-078 10.5.4 which confirms that there will be no breakout points along

Reference	Written Representation Comment	Applicants' response
	is assumed that there will be breakout points which would in turn result in impact on the function of the golf course.	the trenchless installation and thus no potential impacts to the function of the golf course.
REP1-078 15.4.5	Therefore, the likely impact is that the development undermine the Council's protections for the Links Golf Course as set out in FLP Policy EC6.	This in turn means that the Council's protections for the St Annes Old Links Golf Course under Policy EC6 will not be impacted.
REP1-078 15.5.1	<i>Fylde Coastline</i> FLP Policy EC6 states that "The Council will plan for leisure, culture and tourism by: ... f) Protecting tourism, cultural, heritage and leisure assets, such as golf courses ...; h) Promoting beach leisure activities, coastal tourism and recreational events ...". The coastline plays a multifunctional role within Fylde, notably including in providing an attractive, accessible for place to exercise and recreate.	The Applicants note Fylde Borough Councils comment.
REP1-078 15.5.1	The lack of detail around the nature, timing, frequency and duration of the impacts upon the dunes and access to them, means that the impacts cannot be properly understood. The development would undermine the objectives set out in FLP Policy EC6 and therefore is contrary to the policy.	The Applicants refer Fylde Borough Council to Volume 1, Chapter 3 (F1.3/F03, AS-024) and Annex 5.3 to the Applicants response to Hearing Action Points: ISH1 13, 14, 16, 17 (REP1-040) which provides further detail on the trenchless technique crossing. The Applicants refer Fylde Borough Council to REP1-078 13.5.1 regarding Policy EC6.
REP1-078 15.6.1	<i>Human Health and Recreation Summary</i> The application is not supported by sufficient information to be able to assess the potential impacts to human health and recreation. Where impacts have been identified, the ES does not include appropriate proposals for mitigation or control measures.	Volume 1, Annex 5.1: Human health (APP-035) sets out an appropriate assessment in line with guidance and good practice. This includes assessment on use of PRoW and open spaces, including Blackpool Road Recreation Grounds. Specific mitigation measures to reduce adverse effects have been included, including the adoption of trenchless drilling techniques, use of alternative haul road routes and use of visual screening. The UK Health Security Agency and the Department of Health's Office for Health Improvement and Disparities have reviewed the assessment and state that they agree with the methods and that they are satisfied that the proposed development should not result in any significant adverse impact on public

Reference	Written Representation Comment	Applicants' response
		<p>health (AS-061). As significant adverse effects are not anticipated further mitigation and monitoring is not considered to be required.</p> <p>Recreational receptors have been identified in Volume 3, Chapter 6; Land Use and Recreation (APP-104) and potential effects on these receptors assessed in Section 6.11.4. Appropriate mitigation measures to reduce, wherever possible, effects on PRoW are proposed in the Outline PRoW Management Plan (AS-048) and in the Open Spaces in the Outline Open Space Management Plan, Annex A to AS-048).</p>
REP1-078 15.6.2	Additionally, the applicant has not identified ways in which harm caused to human health and recreation could be mitigated through support of social value and local strategies to improve health and wellbeing.	Appropriate mitigation measures are set out in the Outline Code of Construction Practice (APP-193) and Outline Public Rights of Way (PRoW) Management Plan (AS-048). The opportunities for community social value and promotion of health and wellbeing are delivered through the Outline Employment and Skills Plan (APP-239), which the health assessment has informed. These include opportunities for underrepresented and vulnerable groups, including those who are not in education, employment or training. (See also responses to REP1-078 17.1.1 and 17.1.2)
REP1-078 15.6.3	The likely impacts are that the harmful impacts on human health and recreation cannot be properly assessed, mitigated and managed, thereby increasing harm without justification.	Clarification has been provided above to confirm that the impacts have been appropriately assessed.
Interrelationships and Cumulative Effects		
REP1-078 16.1.1	<p><i>Introduction</i></p> <p>Paragraph 4.1.5 of EN-1 requires that long-term and cumulative adverse impacts, along with any measures to mitigate or compensate for adverse impacts, should be taken into consideration when weighing the adverse impacts of the proposal against the benefits.</p>	As noted in Volume 1, Annex 5.5: Cumulative effects screening matrix and location plan (REP1-020), the offshore CEA screening is set up to 2055 as this is deemed the timescale for which any cumulative impacts could be reasonably foreseen and potentially overlap with the operational period of the Transmission Assets. Any projects and subsequent impacts which are to occur beyond this period are currently unknown, and therefore increasing this time beyond 2055 would not change the outcomes of the CEA, as all

Reference	Written Representation Comment	Applicants' response
		<p>relevant known impacts have been taken into account. There is no guidance to specify this period, but the Applicants have used precedent in terms of what has been done for other EIAs, such as the Generation Assets.</p> <p>With respect to the onshore CEA, Volume 1, Annex 5.5: Cumulative effects screening matrix and location plan (REP1-020) notes that any known projects were also considered for the anticipated project lifespans during the operation and maintenance phase, which would be up to and including 2055, where relevant (e.g., solar farms within the onshore cable corridors).</p> <p>An update to the CEA longlists has been undertaken and included in Volume 1, Annex 5.5: Cumulative effects screening matrix and location plan (REP1-020) to take account of applications submitted since submission and where status' have changed. An update to the assessment of cumulative effects has been submitted at Deadline 2 (S_D2_10)</p>
REP1-078 16.1.2	As set out throughout this LIR, FBC considers that for all topic areas, there is insufficient information and inappropriate analysis, such that the adverse impacts cannot be properly defined. This means that a balancing exercise cannot be properly carried out.	See response to REP1-078-16.1.1 above.
REP1-078 16.2.1	<p><i>Clarification Required on Applicant's Works Plans</i></p> <p>Further clarification is required in respect of the Works Plans as submitted. At present, the areas identified are considered wider than is necessary to facilitate the development. There is also a lack of clarity and confusion on the cable installation methods for different work areas/locations, which results in uncertainty over the potential impacts.</p>	The Applicants note Fylde Borough Council's comment and will proactively engage with them on this ahead of and during the detailed design stage and production of the Construction Method Statement, in consultation with relevant stakeholders.
REP1-078 16.2.2	The separation of works into Projects A and B leads to a lack of clarity as to how the works associated with each project will be brought forward and their duration, including whether they will run in parallel or in series. Until confirmation of this can be provided, the full cumulative impacts of the projects cannot be quantified.	In response to the Rule 9 Letter (PD-005), the Applicants submitted 'Rule 9 – ES assessment of Construction Scenarios' (AS-070). Section 1.6.4 of 'Rule 9 – ES assessment of Construction Scenarios' (AS-070) sets out each impact on a topic-by-topic basis alongside the MDS construction scenario assessed in the ES and the justification of this. In addition, at Deadline 1 a 'Clarification Note: Construction Scenarios (REP1-060) was submitted and provides additional clarification on the MDS construction scenarios with regard to air

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		quality (ecological and human health impacts related to air quality), hydrology and flood risk and noise and vibration. The MDS construction scenarios noted for each topic have been carried through into their CEA. Confirmation on the temporal overlap for the CEA is also included in the AS-070 clarification note.
REP1-078 16.3.1	<i>Other Schemes</i> Further information is required from the applicants regarding the cumulative impacts of both on- and off-shore wind farm projects upon the matters raised within this report.	See response to REP1-078-16.3.2 below regarding the updated CEA longlist and assessment.
REP1-078 16.3.2	Consideration should also be given to other committed developments in the area which are due or expected to be brought forward within the same timeframe. For Fylde, this includes the following: <ul style="list-style-type: none"> Application reference 24/0414 is a live application for a 49.9MW solar farm at Clifton Marsh Farm in Newton with Clifton, covering 69ha; Application reference 24/0541 is a live application for a 28MW solar farm at land to west of Parrox Lane in Newton with Clifton, covering 32ha. 	An update to the CEA longlists has been undertaken and included in Volume 1, Annex 5.5: Cumulative effects screening matrix and location plan (REP1-020) to take account of applications submitted since submission and where status' have changed. The two schemes highlighted 24/0414 and 24/0541 have been included as part of these updates and screened into assessments for onshore and intertidal ornithology and onshore ecology and nature conservation. An update to the assessment of cumulative effects has been submitted at Deadline 2 which identified that there is no change to the conclusions of the Environmental Statement (S_D2_10).
REP1-078 16.3.3	Furthermore, FBC is the opinion that the in-combination effects of both the generation and transmission assets must be considered for all topics. The applicant has referenced in- combination effects to support its analysis of climate change impacts but has not carried out the same assessment for other impacts.	The Applicants have provided a detailed response with regard to in-combination effects previously within RR-705.10 (PDA-030).
REP1-078 16.3.4	FBC is concerned about this approach, is not appropriate to be selective in this regard. If the decision is that the generation and transmission elements can be considered separately, then FBC is of the opinion that the principle of development should not be predicated on the existence of the generation application.	The Applicants have provided a detailed response with regard to in-combination effects previously within RR-705.10 (PDA-030).

Reference	Written Representation Comment	Applicants' response
Mitigation through S106 Contributions		
REP1-078 17.1.1	It would be beneficial for the applicants to put forward a significant financial contributions package which is at scale to support nature recovery and green space projects to mitigate against the impact of the offshore wind farm development. The proposed mitigations as currently proposed are insufficient and inconsequential in their effect.	The Applicants note that the measures identified at 17.1.2 are not Environmental Impact Assessment mitigation measures required for the implementation of the Transmission Assets. Therefore, these are not required to be secured through a S106 Agreement.
REP1-078 17.1.2	<p>Such projects could include the following.</p> <ul style="list-style-type: none"> Fairhaven Lake Desilting Project and saltmarsh improvements. A £700,000 designed scheme to remove sediment from the saltwater marine lake, repurposing the material to create retained in-lake edge wetland habitat. The project would restore lake water quality and prevent eutrophic conditions, enable the expansion of recreational activities and protect the site's built and natural heritage as a gateway site to the Ribble Estuary Ramsar/ SSSI. Fylde Sand Dunes Project – A £1 million existing Environment Agency Project with a limited funded life of 5 years ending 26/27. Delivered by Fylde, Blackpool Council and Lancashire Wildlife Trust to protect the dunes as a soft sea defence and nationally important habitat for protected species. Match funding towards the project would facilitate the expansion of the existing project team to deliver further habitat conservation works, education and community engagement activities. Blackpool Road Playing Fields – Investment towards on-site parking to alleviate congestion because of football matches, combined with improved on-site youth and club house facilities would be attractive to the local community. 	<p>Notwithstanding the above, the Applicants are committed to delivering wider community benefits. Section 1.5 of the Statement of Reasons (REP1-012) provides details on the key benefits of the Transmission Assets. These include but are not limited to:</p> <ul style="list-style-type: none"> Community Fund for Transmission Infrastructure - The Applicants are committed to delivering a community benefit fund in line with the Community Funds for Transmission Infrastructure guidance recently published (updated 9 April 2025) by the Department for Energy Security and 28 Net Zero. The guidance sets out the government's recommendation for the level of funding that developers should consider for community benefit, which is outlined to be £530,000 for each onshore substation. In alignment with the guidance, the Applicants will commence engagement with key stakeholders later this year to ensure that any community benefit scheme considers the needs of the community and supports local priorities, where possible. Biodiversity Benefit: In addition, the Applicants have committed to providing biodiversity benefit although this is not a mandatory requirement of any Nationally Significant Infrastructure Projects until November 2025. The Applicants are proposing to make a voluntary commitment to achieve an overall biodiversity benefit for areas of permanent habitat loss associated with the permanent above-ground infrastructure of the Transmission Assets. Full details of biodiversity benefits associated with the Transmission Assets are contained within the Onshore Biodiversity Benefit Statement (J11/F03)

Reference	Written Representation Comment	Applicants' response
		<ul style="list-style-type: none"> • Socio-economic benefits: The Transmission Assets will have direct economic benefits through the creation of employment associated with delivering each phase of a project. Requirement 19 of Schedules 2A and 2B to the draft DCO (C1/F04) requires that no works may commence within a relevant planning authority's area until, after consultation with Lancashire County Council, an employment and skills plan has been notified in writing to the relevant planning authority. This must be substantially in accordance with the Outline Employment and Skills Plan (APP-239) submitted with the DCO application. <p>In addition, as outlined within the Outline Ecological Management Plan (J6/F02) the Applicants are also pursuing additional opportunities for enhancement via engagement with projects in the wider area.</p>
Conclusions		
REP1-078 18.1.1	<p>FLP Strategic Policy CL3 relates to renewable and low carbon energy, setting out that opportunities for such development should be maximised whilst ensuring that the likely adverse impacts are addressed satisfactorily. FBC fully acknowledges that the likely benefits of the scheme would relate to the following matters:</p> <ul style="list-style-type: none"> • Promoting clean and renewable energy. • Reducing reliance on fossil fuels. • Creating jobs and boosting economic growth. • Contributing to environmental sustainability by reducing greenhouse gas emissions. • Lowering air pollution. • Providing security of supply. 	The Applicants note the response.

Reference	Written Representation Comment	Applicants' response
	<ul style="list-style-type: none"> Facilitating cable access to two offshore wind farm applications. 	
REP1-078 18.1.2	FBC acknowledges the weight given to renewable energy as a public benefit. However, this depends on the specific nature of the proposed buildout, operation and decommissioning of the proposal, with reference to the broadest range of potential impacts. This is not only important for understanding the impacts of the development in order to be able to appropriately mitigate harm but also in terms of ensuring that any positive impacts arising can be used effectively.	The Applicants refer Fylde Borough Council to their response to REP1-078 4.1.4. in relation to the comment regarding 'the broadest range of impacts', both adverse and beneficial.
REP1-078 18.1.3	The FLP and National Policy Statements require that adverse impacts be weighed against the public benefits. However, proposals must properly identify, assess and manage adverse impacts and the proposal's ES and supporting documents are in FBC view is deficient.	The Applicants refer Fylde Borough Council to their response to REP1-078 4.1.4. in relation to identification, assessment and management of adverse impacts, using the 'Rochdale Envelope' approach.
REP1-078 18.1.4	At a high level, the EIA has not been prepared to properly assess all scenarios and impacts, with at least one alternative route not being assessed and several others which in FBC view having not adequately assessed.	The Applicants refer Fylde Borough Council to their response to REP1-078 5.1.3 with regard to 'alternative routes'.
REP1-078 18.1.5	FBC accepts the principle of the "Rochdale" parameter plan approach as a basis for assessment and application. However, the parameters set in this proposal are too vague for important impacts to be properly identified, assessed, balanced, managed and ultimately mitigated, with important elements of the proposal undermined by insufficient detail.	The Applicants refer Fylde Borough Council to their response to REP1-078 4.1.4. which confirms that an appropriate level of information has been provided.
REP1-078 18.1.6	In FBC view the appropriateness of the dDCO cannot be fully assessed until the incomplete matters identified in the ES have been addressed. It is apparent that issues exist within the dDCO, notably relating to the permissive nature of any controls relating to	The Applicants refer Fylde Borough Council to their response to REP1-078 4.2.1 which provides clarification in regards to the necessary controls required during the construction phase.

Reference	Written Representation Comment	Applicants' response
	construction (both methods and timing), risk management and monitoring.	
REP1-078 18.1.7	The applicants have repeatedly alleged that the approach being taken with this application, with two entities working together to bring forward a joint scheme, is "unprecedented" and that it will reduce the adverse impacts. FBC is of the opinion that no evidence has been presented to support this assertion and as it stands there is no public benefit being accrued from this approach. In fact, it is the opposite with extended construction commissioning periods, independent construction and decommissioning operations clearly introducing additional risks and harms.	Applicants would refer FBC to the Applicants response to Annex 5.2 to the Applicants response to Hearing Action Points: ISH1 6, 8, 9, 19, 26 & 28 (REP1-039) which provides further context on the benefits of coordination and why they cannot commit to a concurrent construction scenario. As established via the section 35 directions, the NPSs are the primary policy for decision making in regard to the Transmission Assets. The Applicants reiterate Paragraph 4.1.7 of NPS EN-1 which highlights that the need case will outweigh the residual effects in all but the most exceptional cases. It also states that those exceptions include residual impacts onshore and offshore which present an unacceptable risk to, or unacceptable interference with human health and public safety, defence, irreplaceable habitats or unacceptable risk to the achievement of net zero and to unacceptable interference offshore to navigation, or onshore to flood and coastal erosion risk. None of the above exceptions apply to the Transmission Assets which means that as qualifying CNP infrastructure, the Transmission Assets benefit from the presumption that the need outweighs any residual impacts.
REP1-078 18.1.8	The applicants as stated cannot commit to joined approach which could reduce risk and managing impacts. In FBC view this could lead to repeat adverse impacts arising across multiple phases/locations for construction and decommissioning along with duplication of resources and increased impacts on individuals, communities, businesses and the environment.	
REP1-078 18.1.9	The degree of flexibility being sought to facilitate sequential development and reduce interdependency for whatever reason could increase adverse impacts and risks, which have not been properly and adequately assessed in the ES. And importantly prevents the weighing of adverse impacts against public benefit to meet national and local policy requirements.	
REP1-078 Appendix 1	Please see also "Summary Assessment of Local Plan Policy Compliance"	The Planning Statement (REP1-032) and Local Planning Policy Tracker (APP-236) set out those policies the Applicants deemed of relevance to the proposals. Both these documents are to be updated for Deadline /6. As set out above, the Applicants reiterate that the NPSs are the primary policy for decision making in regard to the Transmission Assets.

3 **References**

Author (YEAR) Title. Available at: link Accesses: Date