

MORGAN AND MORECAMBE OFFSHORE WIND FARMS: TRANSMISSION ASSETS

Applicants' Response to Blackpool Borough Council Local Impact Report



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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 Report

2.1 Blackpool Borough Council – Local Impact Report (LIR)

Table 2.1: REP1-068 – Blackpool Borough Council – Local Impact Report (LIR)

Reference	Written Representation Comment	Applicants' response
REP1-068 1.1.1	<p><i>Introduction</i></p> <p><i>Terms of reference</i></p> <p>Blackpool Borough Council ('BBC') is a statutory consultee for Nationally Significant Infrastructure Projects ('NSIPs') which incorporate works within or neighbouring its administrative area. BBC is a unitary authority and therefore participates in this Examination in accordance with its statutory responsibilities towards its residents and businesses, and as Local Flood Authority, Local Highways Authority and Local Planning Authority.</p>	The Applicants note this comment regarding the statutory responsibilities of BBC.
REP1-068 1.1.2	<p>This report comprises the Local Impact Report ('LIR') of BBC as it is a host and neighbouring authority for the Morgan Offshore Wind Limited and Morecambe Offshore Windfarm Ltd (the 'Applicants') scheme to construct, operate and decommission two electrically separate transmission systems connecting to the Morgan Offshore Wind Project Generation Assets and the Morecambe Offshore Windfarm Generation Assets ('the Scheme').</p>	The Applicants acknowledge that BBC is a host and neighbouring authority for the Transmission Assets.
REP1-068 1.1.3	<p>This LIR will provide the Examining Authority ('ExA') with BBC's understanding of the site, surrounding area, relevant local issues, planning policies and how the Scheme positively and</p>	The Applicants note the comments regarding the purpose of the LIR.

Reference	Written Representation Comment	Applicants' response
	adversely impacts this context. As per the guidance provided within the Planning Inspectorate's 'Advice note one: Local Impact Reports', this statement will set out both matters of agreement and disagreement but will not make a planning judgement on these matters. Relevant officers have reviewed the proposals submitted by the Applicants having also taken into account representations made by other parties.	
REP1-068 1.1.4	The review of these impacts will highlight the key issues arising from the Scheme, the relative importance of these impacts and the extent to which the Applicant's draft DCO (' dDCO ') adequately addresses them. The review supports the identification of additional requirements, appropriate changes and improvements to the proposals before the ExA makes its recommendations to the Secretary of State.	The Applicants note the comment regarding key issues arising from the Transmission Assets.
REP1-068 1.1.5	This LIR has been prepared in accordance with S60(3) of the Planning Act 2008 (as amended) and having regard to the guidance within the Planning Inspectorate's 'Nationally Significant Infrastructure Projects: Advice for Local Authorities' guide and the MHCLG guidance 'Planning Act 2008: Examination stage for Nationally Significant Infrastructure Projects'.	The Applicants note this comment.
REP1-068 2.1.1	<i>The scheme context</i> <i>Description of the area</i> The Scheme makes landfall to the north of Lytham St. Annes near Blackpool Airport. The connection route then travels in a broadly easterly	The Applicants acknowledge that the landfall and start of the Transmission Assets onshore export cable corridor, as described in sections 3.13 to 3.15 of Volume 1, Chapter 3: Project description (AS-024) which are of most relevance to BBC. The scope of the BBC Statement of Common Ground (SoCG) will reflect the specific locations of interaction between the Transmission Assets and BBC.

Reference	Written Representation Comment	Applicants' response
	direction to connect to the existing National Grid substation in Penwortham, south of Preston. The majority of the connection route falls outside the BBC administrative area. The landfall area and start of the Transmission Assets cable route (and associated infrastructure) are of most relevance to BBC.	
REP1-068 2.1.2	As Host and Neighbouring authority, the works plan indicates that the Scheme will directly impact a portion of land within and controlled by BBC, at the junction of Squires Gate Lane (A5230) and New South Promenade (A584) (known locally as Starr Gate) and the existing junction access to Blackpool Airport from Squires Gate Lane (A5230). The Starr Gate access road, running westwards onto the beach, is also a Council maintained route. Squires Gate Lane lies partially within Blackpool Borough Council's boundary and partly within Fylde, the access point from Squires Gate Lane southwards into Blackpool Airport lies within Fylde but is subject to a cross-boundary agreement administered by Blackpool Borough Council, with Blackpool Airport a wholly owned Blackpool Borough Council asset. The A5230 (Squires Gate Lane) is a main arterial route within South Blackpool linking the M55, to the east, and the Promenade in the west. Residential development sits to the north of Squires Gate Lane, alongside local facilities and services, such as pharmacies, post office, schools and retail offerings.	The Applicants acknowledge the administrative area of BBC and understand that Blackpool Airport lies within Fylde but is subject to a cross-boundary agreement administered by BBC, with Blackpool Airport a wholly owned BBC asset.
REP1-068	There are pockets of residential development on the south side of Squires Gate Lane towards the	The strategic vision of BBC for employment use along the Blackpool – Fylde periphery is noted.

Reference	Written Representation Comment	Applicants' response
2.1.3	Promenade. This area is predominantly comprised of commercial development along the road frontage and Amy Johnson Way, forming the Blackpool Retail Park and Squires Gate Business Park. Blackpool Airport lies beyond this with the majority lying within the green belt which separates the urban areas of Blackpool and Lytham St. Annes. This pattern of development reflects the strategic vision for this location, along the Blackpool – Fylde periphery, which is of sub-regional importance in employment terms.	
REP1-068 2.1.4	In November 2015, Enterprise Zone status was approved for the wider Airport site, coming into force from April 2016 and valid for a period of 25 years. It was envisaged that, over time, the Enterprise Zone status will attract over 280 no. new businesses and create circa. 5,000 no. new jobs over its lifespan. Blackpool Borough Council is the major freehold landowner at the Airport and Enterprise Zone following the purchase of the Airport in September 2017 and the sole owner of the Airport's operational and land holding companies. Blackpool Council is the designated accountable body for the delivery of the Enterprise Zone and purchased the Airport in 2017, to assist in its promotion and delivery.	It is noted that BBC is the designated accountable body for the delivery of the Enterprise Zone.
REP1-068 2.1.5	The dunes and golf course where the Scheme first makes landfall (both of which are located within Fylde Borough Council's boundary) include land which is subject to a range of national and local biodiversity protections, including the Ribble & Alt Estuaries SSSI, SPA and Ramsar sites,	The Applicants acknowledge that Lytham St Annes Dunes SSSI and St Annes Old Links Golf Course BHS are located within the administrative area of Fylde Borough Council, and we are engaging with Fylde in relation to this. Further information on these statutory and non-statutory designated sites is provided within Volume 3, Annex 3.1 Onshore ecology desk study technical report (APP-067).

Reference	Written Representation Comment	Applicants' response
	Lytham and St Annes Dunes SSSI and Starr Hills Local Nature Reserve.	
REP1-068 2.1.6	The Starr Gate accessway which leads onto the beach from Squires Gate Lane, is also owned, managed and maintained by BBC. The accessway is a partially private road which provides vital access to BBC facilities and tenants, the Starr Gate Tram Depot and the Light Craft Club, emergency services including the RNLI and HM Coastguard, beach access for passive and active users and festive activities, as well as being the landfall point for the transatlantic subsea fibre optic cable 'CeltixConnect-2 (CC-2)' (owned by EXA Infrastructure) and other utilities. This internet cable transports up to one third of the world's internet traffic between Blackpool and New York in less than 64 milliseconds.	The Applicants acknowledge the importance of the Starr Gate accessway for a variety of users. In relation to the CeltixConnect-2 fibre optic cable, the protective provisions at Schedule 10 Part 2 of the draft Development Consent Order (C1/F04) will apply in relation to this asset.
REP1-068 2.2.1	<p><i>Planning History</i></p> <p>Planning application history relevant to this submission, on land associated with the transmission connections route within or adjoining Blackpool, is set out below.</p> <p>24/0478 (Fylde Borough Council)</p> <p>Request for screening opinion pursuant to the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 in respect of the proposed installation of a 20.1 megawatts-peak solar farm together with ancillary equipment and infrastructure at Blackpool Airport. This application was submitted to Fylde Borough Council on 16th August 2024 and is awaiting</p>	The Applicants note the three planning applications listed in BBC's LIR. An update to the cumulative effects assessment (CEA) longlist has been undertaken and included in Volume 1, Annex 5.5: Cumulative effects screening matrix and location plan (REP1-020) to take account of all applications submitted since submission and where status' have changed (including these applications). An update to the assessment of cumulative effects has been submitted at Deadline 2 within the Review of Cumulative Effects Assessment and In-Combination Assessment (S_D2_10).

Reference	Written Representation Comment	Applicants' response
	<p>formal determination. The application site is partly owned by Blackpool Airport (who is in the ownership of Blackpool Borough Council) and partly by Blackpool Borough Council itself.</p> <p>25/0006 (Fylde Borough Council) Application to vary condition 2 (approved plans) of planning permission 24/0435 for 'demolition of existing vehicle search point (VSP) and admin office buildings and erection of replacement single storey VSP and administrative facilities building with associated infrastructure including 60 space car park and new secure fencing and access gates up to 2.2 metres in height to site perimeter'. This application was validated by Fylde Borough Council on 07th January 2025 and approved on 11th February 2025. A subsequent application is awaiting validation by Fylde Borough Council in respect of reorientating the approved building. The application site is owned by Blackpool Airport (who is in the ownership of Blackpool Borough Council).</p> <p>23/0589 (Fylde Borough Council) Hybrid planning application relating to Enterprise Zone development consisting of a full application for the construction of new access roads, existing highways improvement works and drainage works; and outline planning application for the construction of 4 no. hangars, a commercial unit (Class B2 / E(G)) and car parking, alongside associated infrastructure works with access</p>	

Reference	Written Representation Comment	Applicants' response
	<p>applied for and all other matters reserved. This application was granted approval by Fylde Borough Council on 12th May 2025. The application site is located on land known as Blackpool Airport and in the ultimate ownership of BBC.</p> <p>The latter two applications present the first stage of works relevant to the coined 'Silicon Sands' area of the Blackpool Airport Enterprise Zone, which seeks to relocate airport related facilities closer to the airport runways enabling land to the north, fronting Squires Gate Lane, to be appropriately redeveloped for commercial use. Silicon Sands will be a digital-led campus for high performance companies to be anchored by a series of green data centres powered by renewable energy. It is intended that the proposed solar farm project (subject to the above screening opinion request) would facilitate this.</p> <p>The Scheme has the potential to impact upon the ability to bring forward the development set out above in a timely and complete manner.</p>	
REP1-068 2.3.1	<p><i>Need for the scheme</i></p> <p>The national and local benefits that the Scheme may deliver is recognised by BBC, which are considered to include:</p> <ul style="list-style-type: none"> Promoting clean and renewable energy Reducing reliance on fossil fuels 	<p>The Applicants welcome BBCs acknowledgement of the need for renewable energy and, specifically, the national and local benefits associated with delivering the Transmission Assets in order to meet climate commitments and contribute to addressing the climate crisis.</p>

Reference	Written Representation Comment	Applicants' response
	<ul style="list-style-type: none"> • Creating jobs and boosting economic growth • Contributing to environmental sustainability by reducing greenhouse gas emissions • Lowering air pollution • Providing security of supply • Facilitating cable access to two offshore wind farm applications 	
REP1-068 2.3.2	<p>Since the Kyoto Protocol came into effect in 2005, it is widely accepted that greenhouse gas emissions need to be significantly reduced and there is a need for international action. As such, the UK and others have committed to reducing greenhouse gas emissions. In 2019, the UK government declared a climate emergency following publication of the Committee on Climate Change report titled 'Net Zero – The UK's Contribution to Stopping Global Warming'. In so doing, the government announced its commitment to achieve net zero by 2050.</p>	<p>The Applicants note this comment. Greenhouse gas emissions due to the Transmission Assets have been assessed and reported in Volume 4, Chapter 1: Climate change (APP-138).</p>
REP1-068 2.3.3	<p>In 2019, BBC also declared a climate emergency and committed to achieving net zero carbon emissions and using 100% clean energy by 2030. It is intended for this goal to assist in protecting the health, wellbeing and livelihoods of the community through the rapid reduction of greenhouse gas emissions and adaptation to reflect the changing climate. As such, the Council are wholly aligned with the government's position</p>	<p>The Applicants welcome BBCs statement that they are wholly aligned with the UK government's commitment to net zero by 2050.</p>

Reference	Written Representation Comment	Applicants' response
	and are in support of the outcomes of the scheme as a whole.	
REP1-068 2.3.4	Whilst BBC are supportive of the outputs of the Scheme, following a thorough review of the application documents submitted with the dDCO, BBC do have concerns about matters raised within this LIR, which require further consideration by the Applicants and resolution during the Examination.	The Applicants note these concerns, which are considered in the following responses.
REP1-068 3.1.1	<i>Planning Policies</i> <i>Introduction</i> As the Scheme is a NSIP, the National Planning Policy Framework ('NPPF') has the status of a material consideration in planning terms. Therefore, relevant paragraphs of the NPPF are set out within this chapter. It is noted that the NPPF has been revised after the Scheme was submitted for examination.	The Applicants note this comment regarding the NPPF. Please refer to the Planning Statement Addendum (S_D2_9) for commentary on the updates to the NPPF. The Applicants acknowledged in the Issue Specific Hearings that there has been an update to the National Planning Policy Framework (NPPF), however the Applicants consider that the NPPF changes are not material, especially given the NPS is the primary policy for the SoS to determine the application (see paragraph (4) of REP1-034).
REP1-068 3.1.2	The relevant Development Plan documents at local level covering the Scheme are also introduced below. Relevant policies are listed, consisting of those set out within the Applicant's Planning Statement (document reference J28) where relevant to Blackpool, alongside any others considered of relevance by BBC as a Host Authority.	The Applicants note this comment regarding the development plan documents.
REP1-068 3.2.1	<i>National Policy Statements</i> When considering NSIP proposals under the Planning Act 2008, the relevant Secretary of State must have regard to any national policy statement	The Applicants note this comment.

Reference	Written Representation Comment	Applicants' response
	('NPS') which has effect in relation to the proposed development S104(2)(a). The relevant NPSs are set out below:	
REP1-068 3.2.2	National Policy Statement for Energy (EN-1): The overarching national policy statement for energy. Published in November 2023 (and in force from January 2024), EN-1 sets out the government's commitment to increasing renewable energy generation capacity and recognises that, in the short to medium term, much of the new capacity is likely to come from onshore and offshore wind.	The Applicants note this summary of NPS EN-1, regarding renewable energy generation capacity.
REP1-068 3.2.3	National Policy Statement for renewable energy infrastructure (EN-3): EN-3, together with EN-1, provides the primary policy direction for the assessment of applications for nationally significant renewable energy infrastructure, including the offshore transmission infrastructure (such as interconnectors, or Multi-Purpose Interconnectors) in English waters.	The Applicants note this this summary of NPS EN-3 regarding policy direction for the assessment of renewable energy applications.
REP1-068 3.2.4	National Policy Statement for electricity networks infrastructure (EN-5): EN-5 sets out the general principles that should be applied in the assessment of development consent applications for network infrastructure, such as transmission cables. The Policy applies not only to transmission infrastructure, but also associated infrastructure such as substations and converter stations.	The Applicants note this summary of NPS EN-5 regarding the general principles for DCO applications.
REP1-068 3.2.5	Paragraph 4.1.5 of EN1 states that, "In considering any proposed development, in particular when weighing its adverse impacts	The Applicants note this summary of Paragraph 4.1.5 of EN-1 relating to potential benefits and adverse impacts of energy infrastructure.

Reference	Written Representation Comment	Applicants' response
	<p>against its benefits, the Secretary of State should take into account:</p> <ul style="list-style-type: none"> its potential benefits including its contribution to meeting the need for energy infrastructure, job creation, reduction of geographical disparities, environmental enhancements, and any long-term or wider benefits: its potential adverse impacts, including on the environment, and including any long-term and cumulative adverse impacts, as well as any measures to avoid, reduce, mitigate or compensate for any adverse impacts, following the mitigation hierarchy.” 	
REP1-068 3.2.6	EN-1 continues to state that the Secretary of State may consider as important and relevant to their decision-making Development Plan documents or other documents in the Local Development Framework. Therefore, whilst it is recognised that the NPS is the primary planning policy document in the ExA's assessment of the Scheme, account should be taken of the NPPF and Local Plan policies of the local authorities.	The Applicants note the comment that the Secretary of State may consider the NPPF and Local Plan policies of the local authorities important and relevant to their decision making, in addition to the NPS. The Applicants acknowledged in the Issue Specific Hearings that there has been an update to the National Planning Policy Framework (NPPF), however the Applicants consider that the NPPF changes are not material, especially given the NPS is the primary policy for the SoS to determine the application (see paragraph (4) of REP1-034).
REP1-068 3.3.1	<p><i>NPPF</i></p> <p>The NPPF was updated by the MHCLG and published in December 2024, this superseded the previous version of the NPPF published in December 2023. The NPPF sets out the Government's national planning policies for England and is an important and relevant consideration in planning decisions. The NPPF</p>	The Applicants acknowledge the updates to the NPPF in December 2024. Please refer to the Planning Statement Addendum (S_D2_9) for further commentary. The Applicants acknowledged in the Issue Specific Hearings that there has been an update to the National Planning Policy Framework (NPPF), however the Applicants consider that the NPPF changes are not material, especially given the NPS is the primary policy for the SoS to determine the application (see paragraph (4) of REP1-034).

Reference	Written Representation Comment	Applicants' response
	does not provide specific policies for NSIPs, however, paragraph 1.10 of the 2024 NPS NN states that the NPPF 'may be an important and relevant consideration in decisions on NSIPs, but only to the extent relevant to that project'.	
REP1-068 3.4.1	<i>Blackpool Development Plan</i> The Development Plan for Blackpool is the Blackpool Local Plan 2012-2027 which comprises two parts; Part 1: Core Strategy was adopted in January 2016 and Part 2: Site Allocations and Development Management Policies was adopted in February 2023.	The Applicants note this comment.
REP1-068 3.4.2	BBC has begun preparation of a new Local Plan for Blackpool which will set out a vision and policy framework up to 2045. Once adopted, the new Local Plan would replace the current Part 1 and Part 2 documents but this is currently at an early stage. It is not anticipated that any new draft policies will get to the stage of being a material consideration during the lifetime of this DCO Inquiry process	The Applicants note that BBC has begun preparation of the Blackpool Borough Council New Local Plan to 2045. Please refer to the Planning Statement Addendum submitted at Deadline 2 (S_D2_9) for further commentary.
REP1-068 3.4.3	Local Plan policies considered the most relevant are summarised below in the Council's Local Impact Report and attached in full in Appendix 1.	The Applicants note these policies.
REP1-068 3.4.4	<i>Blackpool Local Plan Part 1: Core Strategy (2012-2027)</i> The Core Strategy was adopted in January 2016 and sets out where new development such as housing, employment, retail and leisure should be located to meet Blackpool's future needs to 2027. It also identifies areas within Blackpool which are	This is noted. Please see section 3.4.7 of the Planning Statement (APP-233) which sets out relevant policies of the Blackpool Local Plan Part 1: Core Strategy.

Reference	Written Representation Comment	Applicants' response
	to be regenerated, protected or enhanced and sets out key development principles, including those relevant to design, biodiversity and drainage.	
REP1-068 3.4.5	The vision for Blackpool within the Core Strategy is set around building upon its status as a seaside resort, to support its culture, entertainment and business tourism offer.	The Applicants note this comment.
REP1-068 3.4.6	<p>Relevant policies are listed below, expanded policy wording is provided in the following chapters where relevant to the topics to be discussed and full details are provided within Appendix 1:</p> <ul style="list-style-type: none"> • NPPF1 (Presumption in Favour of Sustainable Development) • CS3 (Economic Development and Employment) • CS5 (Connectivity) • CS6 (Green Infrastructure) • CS7 (Quality of Design) • CS9 (Water Management) • CS10 (Sustainable Design and Renewable and Low Carbon Energy) • CS11 (Planning Obligations) • CS21 (Leisure and Business Tourism) • CS22 (Key Resort Gateways) • CS24 (South Blackpool Employment Growth) 	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.

Reference	Written Representation Comment	Applicants' response
	<ul style="list-style-type: none"> CS27 (South Blackpool Transport and Connectivity) 	
REP1-068 3.4.7	<p>Blackpool Local Plan Part 2</p> <p>The Blackpool Local Plan Part 2 seeks to allocate sites for development, safeguarding or protection and sets out policies to guide appropriate development subject to these allocations. The Plan was adopted in February 2023. Relevant policies are listed below and the full wording is provided in Appendix 1:</p> <ul style="list-style-type: none"> DM7 (Provision of Employment Land and Existing Employment Sites) DM8 (Blackpool Airport Enterprise Zone) DM17 (Design Principles) DM19 (Strategic Views) DM28 (Non-Designated Heritage Assets) DM30 (Archaeology) DM31 (Surface Water Management) DM33 (Coast and Foreshore) DM35 (Biodiversity) DM36 (Controlling Pollution and Contamination) DM41 (Transport Requirements for New Development) DM42 (Aerodrome Safeguarding) 	<p>The Applicants note the relevant policies listed. Key policies are set out in 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.</p>

Reference	Written Representation Comment	Applicants' response
REP1-068 3.4.8	The Greening Blackpool SPD (adopted March 2025) provides guidance for new development on matters of landscaping and green infrastructure. The intention of this guidance is to ensure that all residents have access to a sufficient amount of good quality public open space and to support improvements to biodiversity, environmental quality and the appearance of Blackpool.	The Applicants acknowledge this new guidance. This will be addressed in the Planning Statement, which will be updated for Deadline 6 as requested in the Examining Authority's Rule 8 letter (PD-007) examination timetable.
REP1-068 4.1.1	<i>Cumulative Impacts</i> <i>Cumulative Impacts Associated with Extent of Proposed Works</i> The importance to consider cumulative effects in planning and decision making is set out in planning policy, particularly the National Policy Statements. The overarching National Policy Statement for energy (EN-1), for example, specifies a range of aspects for which the Applicant's assessment in the Environmental Statement should consider cumulative impacts, as relevant to the development.	Cumulative impacts are assessed in each individual topic chapter of the ES. An update to the CEA longlist has been undertaken and included in Volume 1, Annex 5.5: Cumulative effects screening matrix and location plan (REP1-020) to take account of all applications submitted since submission and where status' have changed. An update to the assessment of cumulative effects has been submitted at Deadline 2 within the Review of Cumulative Effects Assessment and In-Combination Assessment (S_D2_10).
REP1-068 4.1.2	Paragraph 4.1.5 of EN-1 states that the Secretary of State should take any long-term and cumulative adverse impacts, along with any measures to mitigate or compensate for adverse impacts into account, when weighing the adverse effects of a scheme against its benefits.	The Applicants note this comment regarding cumulative adverse impacts.
REP1-068 4.1.3	<i>Cumulative Impact of wider Development</i> There is insufficient detail and therefore certainty in respect of the proposal currently, in particular the routes, mechanisms and rights required to implement the DCO if granted. Further information	The Applicants consider that its proposals are sufficiently detailed to provide a clear understanding of the Transmission Assets and will continue to engage with BBC to understand their concerns. The Applicants would emphasise that the Application was accepted for examination.

Reference	Written Representation Comment	Applicants' response
	<p>is required from the Applicants regarding the potential and actual effects and consequent cumulative impacts of both on- and off-shore wind farm schemes upon the matters raised within this report. Additionally, 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. In respect of Blackpool, the following proposed developments are considered of relevance:</p> <ul style="list-style-type: none"> • Development at Blackpool Airport; to include new hangars and relevant infrastructure; and • Development at Blackpool Airport Enterprise Zone; to include, Silicon Sands, a solar farm, employment development at Common Edge Road. 	<p>An update to the cumulative effects assessment (CEA) longlist has been undertaken and included in Volume 1, Annex 5.5: Cumulative effects screening matrix and location plan (REP1-020) to take account of all applications submitted since submission, which includes the development at Blackpool Airport and Blackpool Airport Enterprise Zone. An update to the assessment of cumulative effects has been submitted at Deadline 2.</p>
REP1-068 4.1.4	<p><i>Cumulative Impact of Project A and B</i></p> <p>Clarification is required by the Applicant, including within the DCO supporting documents, to justify the proposed transmission cable routes and their extent. Alternative cable routes should be expressed with certainty and assessed at the strategic and the local level, such as whether a single route is suitable for the Scheme, and clarification as to the depths of the proposed cables, precise routes and necessity for the extent of any land take, both temporary (up to 10 yrs) and permanent (for the lifetime energy runs through the cables).</p>	<p>Detailed justification for the routing of the onshore export cable is included within Section 4.9 of Volume 1, Chapter 4: Site Selection and Consideration of Alternatives of the ES (AS-026) and Section 4.6 of Volume 1, Annex 4.3L Selection and Refinement of the Onshore Infrastructure (AS-028).</p> <p>NPS-EN1 Paragraphs 4.3.22 – 4.3.29 states that “<i>the consideration of alternatives in order to comply with policy requirements should be carried out in a proportionate manner. Assessment of multiple alternative routes does not constitute a proportionate manner and that only alternatives that can meet the objectives of the proposed development need to be considered. Alternative proposals which are vague or immature can be excluded on the grounds that they are not important and relevant to the Secretary of State’s decision. It is intended that potential alternatives to a proposed development should, wherever possible, be identified before an application is made to the Secretary of State (so as to allow appropriate consultation and the development of a suitable evidence base in relation to any alternatives which are particularly relevant). Therefore, where an alternative is first put forward by a third party after an application has been made, the Secretary of State may place the onus on the person proposing the</i></p>

Reference	Written Representation Comment	Applicants' response
		<p><i>alternative to provide the evidence for its suitability as such and the Secretary of State should not necessarily expect the applicant to have assessed it."</i></p> <p>The Applicants provided a detailed response to the consideration of alternative cable routing and its materiality as a planning consideration, and whether a single route is suitable for the Transmission Assets within Annex 5.2 to the Applicants response to Hearing Action Points: ISH1 6, 8, 9, 19, 26 & 28 (REP1-039).</p> <p>The route of the onshore export cable corridor is described within section 3.15 of Volume 1, Chapter 3: Project description (AS-024), and , a maximum design envelope for the onshore export cable corridor has been identified within which the final design will sit. This allows flexibility for elements that are likely to require more detailed design subsequent to securing consent.</p> <p>Indicative target trench depths i are set out in Table 3.19 of AS-024 to ensure the export cables remain buried for the operational lifetime of the project.</p> <p>The Applicants refer BBC to the explanation provided at CAH 1 and summarised in their hearing summary [REP1-036] where they explained in detail how their approach to seeking compulsory acquisition of rights and land for the Transmission Assets meets the tests in s122 of the Planning Act and the relevant 'Guidance related to procedures for the compulsory acquisition of land' (Sept 2013). The Applicants also refer to their response at CAH1_2 of the Applicants' response to Hearing Action Points due at Deadline 1 (REP1-037) which further explains how all reasonable alternative to compulsory acquisition have been explored in accordance with the Guidance. This is also set out in the Statement of Reasons [REP1-012], and the Book of Reference [REP1-014], where the specific rights sought for each plot of land are identified based upon the Applicants' objective of seeking to reduce the impact on affected parties and only included the permanent acquisition of land or rights in land where temporary powers are not adequate. In addition, where rights are sought these are the least intrusive to ensure the cables are protected and can be suitably maintained.</p>
REP1-068 4.1.5	The cumulative impacts of all elements of the Scheme within the scope of Projects A and B may result in a number of repercussions which may cause disruption and potential repeat consequences and as such, the appropriate phasing and programming of the Scheme is of the	The Applicants provided a detailed response in relation to construction scenarios and a justification for the maximum design scenario for environmental impact assessment within the response to the Rule 9 letter – ES assessment of Construction Scenarios (AS-070) and the Clarification Note: Constructions Scenarios (REP1-060). The Applicants assert that they have appropriately justified the use of the MDS construction scenario depending on the topic and topic

Reference	Written Representation Comment	Applicants' response
	utmost importance. It is considered that not all adverse effects are fully quantified within the DCO application documents and therefore currently not able to be fully assessed and determined with sufficient certainty.	<p>impact being considered and as such, undertaken a robust and appropriate environmental impact assessment.</p> <p>The Applicants note BBC's use of the word 'phasing'. The Applicants' response to Hearing Action Points (REP1-037) ISH1_23 provides clarity that the ability to construct each project in stages is not the same as 'phasing' in the way that phasing of a scheme might apply in the context of a residential led mixed use development where outline planning permission is granted under the Town and Country Planning Act 1990 where one part or area could be built and the developer may or may not build out further phases. For consistency and as further recognition that all parts of Project A will be constructed in one overall phase and all parts of Project B will be constructed in one overall phase. More detail is provided within the response regarding staging of works under Requirement 3 of Schedule 2A and 2B of the draft DCO (C1/F04).</p>
REP1-068 4.1.6	<i>Clarification Required on Applicant's Works Plans</i> Further clarification is required in respect of the Works Plan's submitted. At present, the areas identified and consequential rights are considered wider and of a greater extent than is necessary to facilitate the development. An example is that of the Starr Gate accessway where the rights sought to be acquired and purpose of such rights, far exceed the use of light craft. It is submitted that there are alternative collaborative mechanisms available.	<p>The Applicants have updated Schedules 3A, 3B, 4A and 4B to address matters raised by BBC in relation to Starr Gate. This is reflected in the updated draft DCO (C1/F04).</p> <p>In addition, the Applicants note that updates have been made to the oCTMP [J5/F02] at Deadline 2 that include commitments within Section 1.10.6 in relation to Starr Gate and its use. The Applicants believe these will address Blackpool Borough Council's concerns.</p>
REP1-068 4.1.7	There is also a lack of certainty as to the cable installation methods for different work areas, cable depths and routes, which makes the potential impacts of the proposed development difficult to assess. For example, as will be discussed further within this statement, the use of open cut trenching through Blackpool Airport land, and current wide rights sought will not be accepted in any circumstance by BBC due to the significant	<p>The Applicants and Blackpool Airport have been in detailed discussions and negotiations regarding the works on Blackpool Airport's operational land for many months. The key principle that the Airport requires to underpin the design of the Transmission Assets is that Blackpool Airport are able to ensure the continued safe, efficient and uninterrupted operation of the Airport.</p> <p>The target burial depth of the onshore export cables through the Airport is one of the matters currently under discussion with Blackpool Airport. The cable depths will align with those presented in Table 3.19 of Volume 1, Chapter 3: Project Description of the ES (AS-024)) depending on the installation technique. The Applicants would note that the land to the south of the main runway is already effectively sterilised for use due to the height restrictions associated with the safeguarding requirements of the main runway.</p>

Reference	Written Representation Comment	Applicants' response
	detrimental impacts they would have upon the airport's operations and consequently reputation.	
REP1-068 4.1.8	The separation of works into Projects A and B leads to confusion as to how the works associated with each part of the Scheme 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 Scheme cannot be quantified, including but not limited to; disruption, maintenance and safety.	The Explanatory Memorandum (REP1-010)) clearly explains the approach taken to separating out works into Project A and Project B and the approach to construction scenarios within the draft DCO. It also explains the use of the 'centreline' approach and overlapping works areas. The use of Project A and Project B works is a well precedented approach where a DCO consents two projects. The Applicants consider the approach they have taken provides clarity as to which works are relevant to each project and have undertaken a robust assessment. The Applicants also refer to the response to REP1-068 4.1.5 above.
REP1-068 4.1.9	<i>Mitigation required on Works Plans</i> Clear plans will need to be provided identifying the final proposals, this should include only the land necessary to undertake Project A and B and for a specified and not general purpose. Land beyond what is required should be removed from the red line boundary and rights schedules.	The Applicants refer BBC to the explanation provided at CAH 1 and summarised in their hearing summary [REP1-036] where they explained in detail how their approach to seeking compulsory acquisition of rights and land for the Transmission Assets meets the tests in s122 of the Planning Act and the relevant 'Guidance related to procedures for the compulsory acquisition of land' (Sept 2013). The Applicants also refer to their response at CAH1_2 of the Applicants' response to Hearing Action Points due at Deadline 1 (REP1-037). This is also set out in the Statement of Reasons [REP1-012], and the Book of Reference [REP1-014], where the specific rights sought for each plot of land are identified based upon the Applicants' objective of seeking to reduce the impact on affected parties and only included the permanent acquisition of land or rights in land where temporary powers are not adequate. In addition, where rights are sought these are the least intrusive to ensure the cables are protected and can be suitably maintained. The Applicants maintain that they are only seeking to acquire land or rights in land where this is necessary and proportionate to facilitate the delivery of the Transmission Assets.
REP1-068 5.1.1	<i>Traffic and Transport</i> <i>National Policy Statements and Legislation</i> Whilst renewable energy proposals are addressed in overall terms in EN-3, traffic and transport is addressed as a generic impact in section 5.14 of EN-1 and 1.3.2 of EN-5. Relevant local policies are discussed below and are generally consistent with that of the NPS.	The Applicants note this response.

Reference	Written Representation Comment	Applicants' response
REP1-068 5.1.2	EN-1 states that where a new energy NSIP may give rise to substantial impacts on the surrounding transport infrastructure, the Secretary of State should ensure that the Applicant has sought to mitigate these impacts, including during the construction phase of the development and by enhancing active, public and shared transport provision and accessibility.	The Applicants note this response.
REP1-068 5.1.3	EN-1 continues that “where the proposed mitigation measures are insufficient to reduce the impact on the transport infrastructure to acceptable levels, the Secretary of State should consider requirements to mitigate adverse impacts on transport networks arising from the development.	The Applicants note this response.
REP1-068 5.1.4	In respect of relevant local legislation, the Road Traffic Regulation Act 1988 places a duty on local highway authorities to take such measures as appear to the authority to be appropriate to prevent accidents, including the dissemination of information and advice relating to the use of roads, the giving of practical training to road users or any class or description of road users, the construction, improvement, maintenance or repair of roads for the maintenance of which they are responsible and other measures taken in the exercise of their powers for controlling, protecting or assisting in the movement of traffic on roads. BBC are the Local Highway Authority.	The Applicants note this response.
REP1-068 5.1.5	<i>Blackpool Development Plan Policies</i>	The Applicants note this response.

Reference	Written Representation Comment	Applicants' response
	Policy CS5 (Connectivity) states that the Council aims to achieve a sustainable, high quality transport network and a quality arrival experience by, amongst other things; reducing road congestion through the elimination of identified 'pinch-points' and providing sufficient, high quality and conveniently located car parks to address capacity issues.	
REP1-068 5.1.6	Policy CS27 (South Blackpool Transport and Connectivity) requires development proposals in South Blackpool to prioritise sustainable modes of transport between homes, jobs and supporting community facilities. Convenient access to public transport and improved pedestrian and cycle infrastructure is also required.	The Applicants note this response.
REP1-068 5.1.7	Policy DM41 (Transport Requirements for New Development) states that new development will only be permitted where the access, travel and safety needs of all affected by the development are met. This includes demonstrating that safe and appropriate connection to the road network is secured for all transport modes with mitigation required where traffic generated will impact on the surrounding highway network.	The Applicants note this response.
REP1-068 5.2.1	<i>Cumulative Impacts</i> The proposals are considered to raise a number of issues in traffic and transport terms. In preparing this response due consideration has been given by BBC's Highways and Traffic Management Team to the following submission documents; the dDCO, Volume 3, Chapter 7: Traffic and Transport of the Environmental	The Applicants note this response.

Reference	Written Representation Comment	Applicants' response
	Statement [APP-108], Street Works Plans [APP-158-APP-159], Access to Works Plan [APP-157], Outline Highway Access Management Plan ('OHAMP') [AS-052] and Outline Construction Traffic Management Plan ('OCTMP') [APP-211].	
REP1-068 5.2.2	Traffic and transport impacts are expected to arise in particular in relation to the construction and decommissioning periods of the proposed Scheme. Currently, BBC's overriding concern is that there is not sufficient information available to duly assess the matters raised.	<p>Following submission of the DCO Application, the Applicants have met with BBC on the 8 May 2025 to discuss traffic matters and provided clarifications on a number of the issues that are raised in the BBC Relevant Representation. It is considered that due to BBCs timescales in drafting and approval of the LIR that many of the matters raised are likely to have been addressed in these discussions.</p> <p>The Applicants shared an updated version of the Outline Construction Traffic Management Plan (OCTMP) with BBC on the 28 May 2025 and have submitted this at Deadline 2 (J5/F02). The Applicants are confident of reaching agreement with BBC on traffic matters and will provide an update to the ExA via a Statement of Common Ground.</p>
REP1-068 5.2.3	Whilst not lying predominantly within the Borough of Blackpool, it is expected that any restrictions on traffic flows on Clifton Drive and / or Queensway will lead to congestion on both routes and the wider area. These roads are the only two routes connecting St. Annes Beach and Blackpool, and there is not sufficient capacity in the network to absorb this impact. This has the potential to impact upon the local economy by increasing commuting times and affecting visitor travel, as well as causing disruption to the local community in their day-to-day trips. The timings of the construction activities are understood to be indicative currently, therefore, there is insufficient detail to allow a thorough assessment of impacts to be undertaken.	<p>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 all A, B and Classified roads (with the exception of Leach Lane) and railways proposed to be crossed by the Transmission Assets (see CoT02, Volume 1, Annex 5.3: Commitments Register (F1.5.3)F1.5.3/F03)). This commitment to the use of trenchless techniques is secured via the Onshore Crossing Schedule and Requirement 5(2) (Detailed design parameters onshore) of Schedules 2A and 2B of the draft DCO (REP1-008) and Requirement 8 (Code of Construction Practice) of Schedules 2A and 2B of the draft DCO (REP1-008).</p> <p>The commitment to the use of trenchless installation techniques would ensure that there are no restrictions on traffic flows on Clifton Drive and/ or Queensway.</p>
REP1-068	At present, the limited information provided on the phasing of Projects A and B means that	

Reference	Written Representation Comment	Applicants' response
5.2.4	cumulative impacts have not been adequately assessed, and in practice the effects of traffic arising from the Scheme may be underestimated over a significant period of time dependent on the duration and whether they will run in parallel or separately. Should there be delays between the commencement and completion of the two elements, impacts on the highway would be exacerbated. As such, co- ordination between Projects A and B should be sought to minimise disruption wherever possible.	<p>The Applicants refer BBC to REP1-068 4.1.5 in relation to phasing of the Transmission Assets (and why that is not applicable).</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 of increased construction traffic movements. 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.</p> <p>The assessment is not sensitive to programme changes as it has been undertaken on the basis of the worst case for traffic and transport, i.e. the peak demand, Morecambe and Morgan constructed concurrently (the Concurrent Construction Scenario). The assessment concludes that residual effects are no greater than minor adverse, i.e. not significant in EIA terms. The assessment is based on the maximum design scenario of daily peak construction traffic overlapping for both projects - no reduction has been applied to the significance of effect to account for the temporary nature of this scenario. Whilst the Applicants acknowledges that sequential construction will result in effects occurring over a longer period, the volume of traffic (and therefore magnitude of impacts) will be less. The Applicant would note that the assessment complies with all relevant traffic and transport guidance including the IEMA Guidelines for the Environmental Assessment of Traffic and Movement 2023.</p>
REP1-068 5.2.5	The potential cumulative impact of the Scheme, combined with other developments that are being built out, committed developments, those subject to planning applications or required by utility companies, requires further consideration and confirmation from the Applicants that any resultant impacts would not be severe.	
REP1-068 5.2.6	The proposals should support the maintenance of safe and convenient access for all, particularly given the importance of tourism-based events and activities for the Fylde Coast's economy. Currently, a lack of information regarding the Scheme's programme prevents a full assessment of the possible impacts.	<p>A Cumulative Effects Assessment has also been undertaken based upon the outputs of the screening exercise detailed Volume 1, Annex 5.5: Cumulative screening matrix and location plan (APP-039) for a future year of 2027. Baseline traffic flows have also been growthed to 2027 reference year by the application of the DfT Trip End Model Presentation Programme TEMPRo factors. The model derives growth factors at a local level to forecast increases in traffic due to organic growth in housing and businesses.</p> <p>The screened in cumulative sites have been assessed to determine the developments that will generate material traffic and therefore have the potential for cumulative effects with the Transmission Assets. The traffic forecasts from these projects + the Transmission Assets have been assessed against 2027 baseline flows to determine the magnitude of impact [APP-108] F3.7 Volume 3, Chapter 7: Traffic and Transport, Table 7.38.</p> <p>Overall, it was concluded that there would be no significant cumulative effects arising from the Transmission Assets, plus the screened in cumulative projects.</p>

Reference	Written Representation Comment	Applicants' response
		The updated OCTMP submitted to BBC for consideration, contains provisions for managing the cumulative maximum design scenario. This includes commitments to managing cumulative traffic movements between Morgan and Morecambe and also with other projects. The updated OCTMP has been submitted at Deadline 2 (J5/F02).
REP1-068 5.2.7	Lancashire County Council ('LCC') in their role as a Host Authority over a substantially larger area than BBC has undertaken significant assessment of the Applicant's submission. BBC has reviewed their Relevant Representations [RR-1262] and fully support the various conclusions of their assessment.	The Applicants note this response.
REP1-068 5.3.1	<p><i>Mitigation / Adequacy of the DCO in respect of Cumulative Impacts</i></p> <p>BBC welcomes the preparation of an OCTMP, however further detail on the intended programme of works and construction scenarios is required for BBC to be able to assess and consequently be assured of the full implications of the proposed development. Consideration should be given to the impact of the construction and decommissioning periods where they coincide with known events that take place on the Fylde coast including; the Lytham Festival, golf tournaments, Blackpool Illuminations and peak tourism periods such as school holidays and the summer months, alongside other development schemes such as those at Blackpool Airport Enterprise Zone and significant utility upgrades / repair work. BBC would be happy to provide the Applicant's with further information on each of these. A cumulative assessment should then be undertaken.</p>	The Applicants have provided an updated version of the OCTMP to BBC for consideration which seeks to address their concerns. This includes commitments to managing construction traffic movements during planned events and unplanned incidents. The updated OCTMP has been submitted at Deadline 2 (J5/F02).

Reference	Written Representation Comment	Applicants' response
REP1-068 5.3.2	Mitigation must be proposed for potential conflicts, such as, through early consultation with users, publication drops and appropriate signage. Events such as the Illuminations bring a greater amount of traffic to the area later in the evening and so any extended periods of working will need to take this into consideration. Appropriate alternatives to working periods should be considered during these times. Relevant mitigation will require agreement with the Local Highways Authorities (including BBC) prior to commencement.	
REP1-068 5.4.1	<p><i>Impacts of Construction / Decommissioning Traffic Starr Gate</i></p> <p>It is understood that the dDCO allows for Starr Gate to be subject to a temporary possession which may include closure, of which the specific details are unknown. It is not clear at this time what the extent of use of this access will be. This accessway provides the direct and only access to a number of Blackpool assets, namely the tram depot, a large electricity substation and sailing and angling clubs. It is also the access for emergency services, including the RNLI, HM Coastguard and Fire and Rescue, to a significant stretch of beach to the north and south and for maintenance and monitoring of the sea walls and dunes. In addition, the road and ramp are used by the general public to access private facilities and the beach for recreational purposes. Any changes to access would impact upon these users.</p>	The Applicants have discussed the matter of access via Starr Gate with BBC at the meeting on the 8 May 2025. During this meeting it was agreed that the Applicants would amend the OCTMP at Deadline 2 to clarify that the route will not be used by HGVs. The updated OCTMP has been submitted at Deadline 2 (J5/F02).
REP1-068	Within LCC's Relevant Representations concerns are raised regarding the unsuitability of some	

Reference	Written Representation Comment	Applicants' response
5.4.2	minor roads because of the carriageway width and / or lack of footways or significant verges. This concern extends to the Starr Gate access where the carriageway of the private road narrows to under 5m (and then further narrows at the slipway). Due to this, larger vehicles would struggle to pass each other if meeting at the wrong point and similarly, pedestrians and cyclists would have little clearance to larger vehicles at some points. Stationary vehicles could block the access entirely.	
REP1-068 5.4.3	There are significant utilities present within the Starr Gate access corridor which may require works for protection. Access would need to be maintained to these utilities for maintenance and monitoring purposes. In particular, data cables owned and operated by Aquacomms and Vodafone come ashore and run through the sand under the dunes to a chamber in the sailing club compound and then alongside and under the Starr Gate accessway. They are understood not to be laid within concrete under the beach and dunes and therefore would be readily subject to damage from heavy plant. These cables are nationally significant infrastructure and uninterrupted use of these utilities is essential. The Aquacomms cable carries traffic to Isle of Man, Dublin and the USA in 0.64 milliseconds, through to Newcastle and then to Denmark, and at this point to the European Union. A plan illustrating the route is provided in Appendix 2.	<p>The Applicants note that Protective Provisions for the protection of statutory undertakers are secured through Schedule 10 to the draft DCO (REP1-008). The protective provisions included in Part 2 of Schedule 10 are for the protection of existing telecoms assets and provide operators with appropriate protections for uninterrupted use of these utilities.</p> <p>The protective provisions secured in Part 2 of Schedule 10 to the draft DCO (REP1-008) are industry standard and based on recent precedent. No concerns have been raised by Aquacomms or Vodafone with regards to the Part 2 Protective Provisions.</p>
REP1-068	The uninterrupted operation of this infrastructure is therefore of national and global importance, and	

Reference	Written Representation Comment	Applicants' response
5.4.4	for BBC forms a critical part of the Silicon Sands development and long-term plans for the Blackpool Airport Enterprise Zone. Further investigations are therefore required by the Applicant to determine if works are needed to protect this infrastructure, or, the rights and proposed uses of Starr Gate need to be better described and restricted so as to give comfort that this infrastructure is not at risk. Protective Provisions as currently worded in the dDCO are not considered to provide the extent of protection required for this vital infrastructure.	
REP1-068 5.4.5	The accessway is considered suitable for consistent use by light vehicles and small trailer vehicles but not heavy vehicles. As such, further information is required from the Applicant advising how construction vehicles are envisaged to enter and traverse Starr Gate and the expected type and size of vehicle and any plant to be transported. Sufficient detail should be provided to evidence that these movements can take place safely and without detriment to the condition of the accessway or cable routes, with appropriate protection put forward. A third-party assessment of the structural integrity of the slipway is requested by BBC, axle loads should then be limited and surface protection installed to comply with assessment recommendations.	The Applicants refer BBC to REP1-068- 5.4.1 above.
REP1-068 5.4.6	The Starr Gate junction also represents the beginning of the Blackpool Illuminations route, with visitors directed here to then travel northwards along the Promenade to see the full length of the illuminations. The ability to continue	The Applicants refer BBC to REP1-068- 5.3.1 above.

Reference	Written Representation Comment	Applicants' response
	to do this should not be restricted at any point in lifetime of the proposed development as it would have a great impact on visitor experience, the logistical planning of the event and consequently a potentially significant economic impact.	
REP1-068 5.4.7	<p>In the case of Starr Gate, should the land within the proposed order limits be closed to traffic, the direct effect would be to prevent the following:</p> <ul style="list-style-type: none"> • Access to and egress from the Tram Depot, other business premises, active and passive recreational users to the beach and sea wall • Traffic movement from any other arm to the Promenade A584 on the north side of the junction (the main flow of Illuminations traffic) 	The Applicants refer BBC to REP1-068- 5.2.3 and 5.4.1 above.
REP1-068 5.4.8	<p><i>Squires Gate Lane access into Blackpool Airport</i></p> <p>A route from Squires Gate Lane through Airport operational land has been identified on the Applicants' submission documents and orally at the ISH1 Hearing. The use of this route has the potential to impact adversely upon the operations of the Airport for the duration of the Scheme. Therefore, further information is required on the cable route, depths and extent of rights necessary to implement the Scheme in order to provide certainty over how this would be managed. It is also requested that the Applicant confirm at what stages of the proposed development this accessway would be utilised (for example: construction, maintenance, or emergency).</p>	The Applicants and Blackpool Airport have been in detailed discussions and negotiations to enter into a cooperation agreement regarding the Blackpool Airport works and to address potential impacts on the operations of the Airport which includes use of this access. The Applicants are confident that through those discussions the concerns related to this access can be addressed in full. The Applicants also refer to the response at REP1-068 5.5.13 below.

Reference	Written Representation Comment	Applicants' response
REP1-068 5.4.9	<p>Squires Gate Lane A5230 is the signed route from the M55 to a large part of Blackpool and is also well used as a route to St. Annes. In the holiday season, as well as for special events and particularly during the Illuminations there are heavy traffic flows and, at times, significant congestion. To exacerbate this would be to directly affect the economics of the tourist industry of the town and its neighbours. Should a closure of the westbound part of Squires Gate Lane at the Airport's designated emergency access be required, as indicated and to the extent shown by the red edge, this would prevent the following without significant traffic management arrangements:</p> <ul style="list-style-type: none"> Egress from that part of the Airport estate (entry side is not identified to be occupied on the Applicants' plans) Any traffic movement from another arm to the west side of the junction (the main flow of Illuminations traffic) 	The Applicants refer BBC to REP1-068 5.4.8 in relation to the Squires Gate Lane access to Blackpool Airport.
REP1-068 5.4.10	<p><i>Wider Implications</i></p> <p>As presented, the proposed development offers significant scope for flexibility, both in terms of methodology and the duration of programming of each element of work. Unfortunately, this means the current level of detail available is limited and makes constructive comment on the potential implications difficult.</p>	The Applicants have provided clear and sufficient detail within the application documents to enable third parties to assess the potential implications of the proposed development. In particular, the Applicants refer to REP1-068 4.1.5 which confirms that the maximum design scenarios have been assessed and a robust assessment of impacts has been undertaken. This assessment is based on the Rochdale Envelope approach as set out in ISH1_22 of the Applicants Response to Hearing Action Points due at Deadline 1 (REP1-037) The Applicants also refer to the Explanatory Memorandum (C3/F04) and Annex 5.2 to Applicants response to Hearing Action Points: ISH 6, 8 19, 26 & 28 (REP1-039) which explain the basis and rationale for the flexibility sought within the Application.
REP1-068	The construction and decommissioning activities associated with the Scheme may impact how	The Applicants refer BBC to REP1-068- 5.4.1 above.

Reference	Written Representation Comment	Applicants' response
5.4.11	emergencies in the local area are managed and responded to. The Starr Gate accessway provides direct access to the beach for services responding to coastal emergencies and Blackpool Airport has air ambulance capabilities. Should access to either be obstructed this could impact upon the efficiency of emergency response. As the development would likely impact upon routes simultaneously, previously perceived alternatives may not be available and so an understanding of how existing access routes would be maintained / alternative routes facilitated will need to be provided for the duration of the works.	
REP1-068 5.4.12	There are existing bus routes which traverse Squires Gate Lane, Clifton Drive North and New South Promenade. The Scheme should not detrimentally impact upon the routing and timetable of these services which support the local population in their day-to-day needs.	The Applicants refer BBC to REP1-068- 5.2.3 above which confirms that no public access routes within the BBC area will be closed.
REP1-068 5.4.13	The extent of works and the working hours have the potential to impact local businesses and residents. The Applicants have set out within the OCTMP, proposed core working hours of 0700-1900 Monday to Saturday and also advises that there may be up to one hour before and after for mobilisation, 0600- 0700 and 1900-2000 weekdays and Saturdays. Further to this, allowances are made for a continuous working basis 0000-0000 Monday to Saturday for specific works. No information is provided on the extent of works which may be undertaken on a 24 hour basis and the potential impact this may have on residential amenity. Reference is also made within	<p>The Applicants note that the extent of 24-hour working is detailed in Section 3.13 of Volume 1, Chapter 3: Project Description of the ES (AS-024) and secured via Requirement 14(4) of the draft DCO (Rep1-008) in relation to where 24-hour working has been assessed. This is assessed within all relevant chapters of the Environmental Statement, included within the Maximum Design Scenario tables.</p> <p>The Applicants have provided additional clarifications and controls within the updated oCTMP (submitted at Deadline 2 (J5/F02)) in regard to delivery hours and how this is managed and monitored. This updated OCTMP has been shared with BBC on 28th May for comment.</p>

Reference	Written Representation Comment	Applicants' response
	the OCTMP to mobilisation not including HGV movements into and out of sites and suppliers using light vehicles being able to make use of the wider highway network outside of these hours to travel to or from site. This raises concerns in respect of highway safety particularly with increased traffic on local roads during these hours and the spring/summer period.	
REP1-068 5.4.14	Inadequate assurance has been given within the submission documents regarding the mitigation of impacts and reinstatement of highway assets post-development, nor is there sufficient detail on their mechanism of delivery. As such, BBC is concerned that there would likely be unremedied damage to the highways for at least a period of up to 10 years and perhaps indefinitely. The level of which may be significant given the lack of detail as to the number and type of vehicle movements expected across the entirety of Projects A and B.	The Applicants have provided additional commitments within the updated OCTMP (submitted at Deadline 2 (J5/F02)) to manage the deterioration of the highway asset. This updated OCTMP has been shared with BBC on 28 th May for comment.
REP1-068 5.4.15	In the case of either Starr Gate or the access to Blackpool Airport, the occupation (as a closure) of the land within the proposed order limits would have very serious consequences in displacing traffic. This applies particularly within tourist seasons where even if extensive diversion signage were provided, local traffic would inevitably divert through residential roads in significant numbers. It is noted that there are vacant areas of land adjacent to the edged sites which could be occupied in some way. Further information is required from the Applicants on this matter.	The Applicants refer BBC to REP1-068- 5.2.3 above which confirms that no public access routes within the BBC area will be closed.

Reference	Written Representation Comment	Applicants' response
REP1-068 5.4.16	The areas of highway indicated to be potentially occupied on Queensway B5261 and Clifton Drive North A584 (in Fylde) are also of concern. The two roads connect Blackpool, the M55 and St. Annes with no other alternative, although traffic to Ansdell and Lytham has the benefit of the new link road. In the Council's experience it has been clearly demonstrated through other schemes the effect of temporary traffic management on either road, leading to congestion on the road directly affected and diversion to the other, precipitating congestion there. As such, this issue clearly needs the careful co-ordination of the Applicants.	The Applicants note this comment and welcomes engagement on the updated oCTMP that was sent to BBC on 28 th May.
REP1-068 5.4.17	<i>Abnormal Indivisible Loads</i> In respect of Abnormal Indivisible Loads ('AIL'), Squires Gate Lane railway bridge is certified to SV-80 Classification. This means a standard vehicle of the SV80 class can cross without any special instructions (such as only vehicle on the structure / modified lanes / reinforcement). This is limited to 80t MGVW with an axle loading limit of 12.5t. This should be suitable for most abnormal loads however, anything larger would need a full assessment and modelling to ensure safety. Clarification should be provided by the Applicants on the type, timing and routing of AIL's proposed.	The Applicants do not propose that any abnormal indivisible loads (AILs) would be required to pass over this bridge. Notwithstanding, the Applicants have provided additional commitments within the updated OCTMP (to be submitted at Deadline 2) to ensure that the final routing of AILs is agreed with the relevant highway authority prior to movements. This updated OCTMP has been shared with BBC on 28 th May for comment.
REP1-068 5.4.18	The above clearly indicates that the consequences of delivery of this scheme are not adequately set out with sufficient certainty. As such, as the host / neighbouring authority (Local Highways Authority) BBC do not consider the Scheme to be acceptable with the information	The Applicants refer BBC to REP1-068- 5.2.2 above.

Reference	Written Representation Comment	Applicants' response
	provided. Further analysis is required which should be supported by necessary mitigation.	
REP1-068 5.5.1	<p><i>Mitigation / Adequacy of the DCO regarding Construction / Decommissioning Traffic Impacts Working Hours</i></p> <p>BBC acknowledges the working hours set out within the submission; however, these are substantially longer than BBC would accept for development works (0800-1800 Monday to Friday and 0800-1200 Saturdays and no working on Sundays or public holidays). Therefore, further clarification is necessary to understand how the extended working hours may impact local residents, businesses and other operations. Inclusion of Saturday as a full working day would conflict with trips for leisure and tourism purposes. As such, the proposed working hours should be considered further.</p>	<p>The Applicants provided a justification of the working hours applied for within the Transmission Assets application within the Applicants response to Hearing Action Points (REP1-037) ISH1_30.</p> <p>The Applicants consider that Saturday afternoon working provides substantial benefits, including the efficient delivery of localised construction activities and therefore less overall disruption to local communities and landowners.</p>
REP1-068 5.5.2	The impact of construction traffic throughout the construction and decommissioning periods should be consistently monitored in collaboration with the Local Highways Authority and mitigation carried out where determined necessary and appropriate.	The Applicants have provided additional commitments within the updated OCTMP (submitted at Deadline 2 (J5/F02)) to monitoring and management of construction traffic. This updated OCTMP has been shared with BBC on 28 th May for comment.
REP1-068 5.5.3	BBC would expect the provision of dilapidation surveys and remedial works for any repairs for all roadways utilised in the Scheme. This work should comprise of; prior to commencement, an assessment of the existing condition of the highway in the immediate vicinity of the site, followed by, within an agreed timescale post-construction and decommissioning periods, a	The Applicants refer to REP1-068- 5.4.14 above which relates to the oCTMP where these issues are addressed.

Reference	Written Representation Comment	Applicants' response
	<p>further assessment of the condition of the highway and a scheme of remediation, including a timescale of works to make good any damage caused to the highway. The scheme of remediation should then be implemented in full accordance with the approved timetable. Mitigation should be considered in collaboration with the Local Highways Authority to ensure that any damages can be rectified to a standard appropriate for all parties, this should include damages to the road surface, street furniture and any other kind of damage to the road network. Works of improvement required to make roadways fit for purpose during the Scheme's lifespan may be accepted as permanent rather than required to be removed post-works dependent on the extent of works undertaken. This would require further consultation with the Local Highways Authority where relevant.</p>	
REP1-068 5.5.4	<p>Should there be significant delay between Projects A and B's commissioning and decommissioning periods then appropriate repairs should be made between each. The OCTMP indicates that consideration will be given to dilapidation before and after the use of 'roads' but would exclude A and B class roads. The Council and County Council would normally seek this mitigation as a conditional requirement for planning approvals for major schemes, such as coast protection works, therefore, the blanket exclusion is unacceptable and a more extensive arrangement should be provided to include all</p>	

Reference	Written Representation Comment	Applicants' response
	road ways to be utilised by the Scheme including private roads and slipways.	
REP1-068 5.5.5	The rights to be acquired in the dDCO are Temporary Possession rights and more substantive than is understood to be required based upon the Applicant's comments at the Hearing. BBC request that the rights set out in the dDCO as far as they relate to the Starr Gate accessway and slipway are deleted and the Applicants should work with BBC to determine alternative and collaborative working. Access will need to be retained via the Starr Gate access for the operations which currently utilise this entrance point. This should be maintained for the length of the Scheme. Further information should be provided on the Applicant's intentions for this access and the conditions of this and any associated traffic management required. This may include the use of banksmen, and specific measures should be agreed between the Applicants and relevant parties. In the event that vehicular activity was at a level that introduced additional risk to pedestrians and / or conflict with other vehicles BBC would expect the contractors' vehicles to be appropriately managed and such measures to be agreed with BBC in advance. It is unknown whether alternative access routes have been considered and clarification should be provided. Should closure of the access not be required this should be deleted from the rights	The intended use of Starr Gate is clarified in the updated OCTMP that has been shared with BBC and has been submitted at Deadline 2 (J5/02).
REP1-068 5.5.6	Within their Relevant Representations, SP Energy Networks have requested that the Applicants provide an overlay plan of their assets and the	As set out in Table 2.137 of The Applicants Response to Relevant Representations Part 2 – Affected parties and statutory consultees (PDA-007), overlay plans were provided to SP Manweb on 31 January 2025 in relation to its assets. The Applicants also note that Volume 1, Annex 3.2:

Reference	Written Representation Comment	Applicants' response
	proposed DCO limits. BBC support this request and ask that this include detail of all underground utilities to provide clarity over potential impacts. This should include a schedule of any crossover points and what these are.	Onshore Crossing Schedule Part 1 and Part 2 (REP1-016 and REP1-018, respectively) provide a schedule and plans of crossover points along the onshore export cable corridor and 400 kV corridor, including identification of SP Energy Networks and other utilities' assets.
REP1-068 5.5.7	<i>Extent of Temporary Works</i> The red edge identified on the Works Plan – Sheet 3 of 21, illustrates that the signal junction and north side of Starr Gate and the beach access straddle BBC and Fylde boundaries. The area of the signalised junction is subject to a cross-boundary agreement and administered by BBC. Therefore, Schedules 3A, 3B, 4A and 4B within the dDCO should be reviewed and updated where necessary to reflect this.	The Applicants have updated Schedules 3A, 3B, 4A and 4B to address the boundary matter raised by BBC in relation to Starr Gate. This is reflected in the updated draft DCO (C1/F04). The intended use of Starr Gate is clarified in the updated OCTMP that has been shared with BBC and has been submitted at Deadline 2 (J5/02).
REP1-068 5.5.8	The dDCO lacks clarity on the temporary closures and works at Starr Gate and the Squires Gate Lane / New South Promenade / Clifton Drive North junction. Further information is required from the Applicants on these works so that the ramifications, beyond maintaining access, may be assessed in relation to maintaining the continued operation of local businesses and the potential impact on key tourist events.	The Applicants refer BBC to REP1-068- 5.2.3 above which confirms that no public access routes within the BBC area will be closed.
REP1-068 5.5.9	Clarification is also required on the construction traffic plans to understand the extent of works to be undertaken in each location. Currently, the arrows shown create confusion as the directions appear contrary to the routing indications.	The Applicants have provided an updated OCTMP to BBC for comment. This OCTMP has been submitted at Deadline 2.

Reference	Written Representation Comment	Applicants' response
REP1-068 5.5.10	It is considered that the powers set out within the dDCO in respect of highways are excessive and unnecessary to provide access to the site compounds and works areas. As such, further clarification from the Applicants on the extent of works is required so that legitimate review and opportunities to raise concern can be accommodated.	As previously noted, the Applicants have updated the OCTMP (J5/02) and provided this to BBC on 28 th May for comment. The Applicants will continue discussions with BBC to seek to address their concerns.
REP1-068 5.5.11	The comments made within this LIR relate only to the extent of routes shown to be affected within the Applicants' submission. Clarification should be provided by the Applicants to confirm whether consideration has been given to the event whereby one of these routes is unexpectedly unavailable, with evidence that alternative routes have been reviewed as these are not a part of the submission. BBC will require routing of traffic associated with the Scheme to be controlled through the dDCO to limit it to only the routes shown.	The Applicants have provided additional commitments within the updated OCTMP (to be submitted at Deadline 2 (J5/F02)) to managing traffic movements in the event of unplanned incidents (e.g. road closures). This updated OCTMP has been shared with BBC on 28 th May for comment.
REP1-068 5.5.12	<i>Squires Gate Lane Entrance into Blackpool Airport</i> Further detail is required on the access route from Squires Gate Lane through the Airport. Consideration is required to the potential conflict between vehicles associated with the Scheme and access to Airport infrastructure including emergency vehicles. Further information regarding the frequency, type of vehicles and personnel expected to utilise this route would support the review of impacts.	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 (REP1-008). The northern access route through Blackpool Airport is an operational access. The Project Description states that no construction is proposed for operational accesses. Operational accesses for the onshore export cable corridor and 400kV grid connection cable corridor would typically be accessed using a Light Goods Vehicle or other 4x4 or multi-terrain vehicle. However, no vehicles are proposed to be used along PRowWs or bridleways for operation and maintenance activities. The Applicants response to ISH1_38 within REP1-037 states the vehicle movements associated with the planned operation and maintenance hours will be updated from 07:00 – 23:00

Reference	Written Representation Comment	Applicants' response
REP1-068 5.5.13	The red edge appears to only cover the exit side of that arm of the junction. This should be reviewed by the Applicants.	to 07:00 – 19:00. An update to the Commitments Register (F1.5.3/F03) has been submitted at Deadline 2. The use of the northern access route is one of the matters currently under discussion with Blackpool Airport and Blackpool Council. The Applicants are confident that through those discussions the concerns related to the northern access can be addressed in full.
REP1-068 5.5.14	<i>Emergency Vehicles</i> Both Starr Gate and the Squires Gate Lane entrance into Blackpool Airport play important roles as existing in assisting access for emergency vehicles. The implications of the Scheme upon access for these services has not been sufficiently considered within the application. Consideration should be given by the Applicants to the existing emergency access arrangements and where potential conflict with the proposals is identified, the Scheme should be altered or appropriate mitigation agreed with relevant parties.	The Applicants refer to REP1-068 5.4.1 and REP1-068 5.5.13.
REP1-068 5.5.15	<i>Use of Abnormal Indivisible Loads</i> Assurance should be given that in respect of AIL's, only those of a weight appropriate for the structures along the route will be used. Clarity should be provided within the CTMP and TMP to enable an understanding of use and frequency of AIL's and these are to be agreed with the highway authorities.	The Applicants refer to REP1-068- 5.4.17 above.
REP1-068 5.5.16	<i>Construction Traffic Management Plan</i> It is acknowledged that an OCTMP has been included within the Applicant's submission.	The Applicants refer to REP1-068- 5.2.2 above.

Reference	Written Representation Comment	Applicants' response
	However, it is necessary for the details of such to be developed and agreed at an early stage with appropriate mitigation embedded through the dDCO. At present, sufficient detail is not available on the matters raised previously within this chapter, to give BBC certainty that all matters can be overcome and a safe scheme provided. The CTMP should be developed in consultation with the relevant highways authorities and require their approval prior to commencement of each stage of development. Compliance with the CTMP will be monitored throughout the Scheme and any breaches will require resolution.	
REP1-068 5.5.17	BBC welcome the opportunity to participate in future engagement with the Applicant's regarding traffic and highways matters alongside LCC.	
REP1-068 5.6.1	<i>Impacts of Operational Traffic</i> BBC require clarification on the Applicant's intended usage of the access road from Squires Gate Lane through Blackpool Airport. BBC recognises that limited access may be required for maintenance during the operational phase but requires more detail on this, including parking implications, land usage and purposes for visits. Until this information is submitted, BBC cannot fully assess this matter.	The Applicants refer to REP1-068-5.4.8 and REP1-068 5.5.12/13.
REP1-068 5.7.1	<i>Mitigation / Adequacy of the DCO regarding Operational Traffic Impacts</i> Further information is required to obtain certainty on potential usage of vehicular routes and land within the operational period of the development.	The Applicants refer BBC to REP1-068 5.6.1.

Reference	Written Representation Comment	Applicants' response
	It is considered that currently the dDCO and supporting documentation do not provide sufficient information to enable an adequate traffic assessment.	
REP1-068 6.1.1	<p><i>Tourism and Recreation Policies</i></p> <p><i>National Policy Statements</i></p> <p>EN-1 relates to socio-economic impacts at paragraph 5.13.1 and of relevance considers that the construction, operation and decommissioning of energy infrastructure may have socio-economic impacts at local and regional levels. Parts 2 and 3 of NPS EN-1 sets out some of the national level socio- economic impacts which includes:</p> <ul style="list-style-type: none"> • effects (positive and negative) on tourism and other users of the area impacted; and • the provision of additional local services and improvements to local infrastructure, including the provision of educational and visitor facilities. 	The Applicants note this response.
REP1-068 6.1.2	The NPS recognises that socio-economic impacts may be linked to other impacts, for example visual and traffic effects may impact on tourism and local businesses. Applicants are encouraged in the NPS, where possible, to demonstrate that local suppliers have been considered in any supply chain.	The Applicants note this response.

Reference	Written Representation Comment	Applicants' response
REP1-068 6.1.3	EN-1 continues to state that the Secretary of State should consider whether mitigation measures are necessary to mitigate any adverse socio-economic impacts of the development. For example, high quality design can improve the visual and environmental experience for visitors and the local community alike.	The Applicants note this response.
REP1-068 6.1.4	<i>Blackpool Development Plan Policies</i> Policy CS21 (Leisure and Business Tourism) of the Core Strategy states that in order to physically and economically regenerate Blackpool's resort core and town centre, the focus will be on strengthening the resort's appeal to attract new audiences year-round.	The Applicants note this response.
REP1-068 6.1.5	Policy CS22 (Key Resort Gateways) of the Core Strategy states that the Council will provide assistance to facilitate major redevelopment schemes to assemble sites and properties where appropriate. Any change in parking provision as a result of major redevelopment must not undermine the resort's ability to accommodate visitor trips.	The Applicants note this response.
REP1-068 6.1.6	Policy DM19 (Strategic Views) of the Local Plan Part 2 requires development to protect and enhance the vies of the following buildings and features of strategic importance: Blackpool Tower and along the seafront and coastline. Development that has a detrimental impact on these strategic views will not be permitted.	The Applicants note this response.

Reference	Written Representation Comment	Applicants' response
REP1-068 6.2.1	<p><i>Tourism Impacts</i></p> <p>Blackpool and the wider Fylde coast represents a popular seaside destination with tourism and the service sector underpinning the local economy. Blackpool itself receives over 20 million visitors every year and has a thriving visitor economy worth £1.7bn. There are 22,000 visitor economy jobs in Blackpool and 50,000 within a 60-minute drive. Events of note include the Illuminations, Blackpool Air Show, Lytham Kite Festival and Lytham Festival. Although some of these events are held in Fylde, visitors often stay in or also visit Blackpool whilst visiting. Therefore, BBC are particularly concerned about direct and indirect impacts of the Scheme upon tourism and visitor numbers.</p>	The Applicants note this response.
REP1-068 6.2.2	<p>Blackpool's growth and prosperity programme seeks to utilise £2bn worth of funding to undergo a major regeneration programme to support town centre regeneration, extend the tourism season and create new jobs in growth sectors. As such, the Scheme should not detrimentally impact or prevent this work from being brought forward.</p>	The Applicants note this response.
REP1-068 6.2.3	<p>Information prepared for the Lancashire region illustrates that there were 66.7 million tourism visits to the region in 2023. Based upon the figures above, this illustrates the importance of Blackpool's visitor economy as it equates to around a third of this figure. Further information on this matter is provided within Appendix 3 and additional information can be provided to the Applicants on request.</p>	The Applicants note this response.

Reference	Written Representation Comment	Applicants' response
REP1-068 6.2.4	The tram is a key piece of tourism infrastructure, with the line running for 11 miles from Starr Gate in the south to Fleetwood in the north. The proposals include temporary closure of Starr Gate, however, the duration and extent of this is currently unknown to BBC. Should the works prevent or disrupt use of the Starr Gate depot this would inevitably cause disruptions to the wider tram network and associated visitor experiences. The same concern is raised in respect of visitors to the Illuminations which run from August bank holiday to the beginning of January each year, with the beginning of the route being the Starr Gate / Squires Gate Lane junction.	The Applicants note this response.
REP1-068 6.2.5	The Promenade is a key tourism asset and provides an important recreation space. Should areas of the seafront and beach at Lytham St. Annes be closed or disrupted due to the works, this would have an impact upon the day-to-day activities of local residents, as well as visitors. There would also be a displacement effect, increasing usage of beaches elsewhere and potentially causing maintenance and ecological impacts.	The Applicants refer to REP1-068- 5.2.3 above in regard to commitments to avoid road closures through design of the Transmission Assets construction commitments, and REP1-068-5.4.1 regarding the Transmission Assets use of Starr Gate. The Applicants have amended the OCTMP at Deadline 2 to clarify that the route will not be used by HGVs. The updated OCTMP has been submitted at Deadline 2 (J5/F02)..
REP1-068 6.2.6	Disruption during the construction and decommissioning periods has the potential to affect the number of visitors to Blackpool and also negatively impact their experience should delays be incurred. There may be impacts upon pedestrian and vehicular safety due to increased highways movements and also severance of known routes between Blackpool and Lytham St. Annes impacting visitor numbers and enjoyment.	The Applicants refer to REP1-068- 5.2.3 above in regard to commitments to avoid road closures through design of the Transmission Assets construction commitments, and REP1-068-5.4.1 regarding the Transmission Assets use of Starr Gate. The Applicants have amended the OCTMP at Deadline 2 to clarify that the route will not be used by HGVs. The updated OCTMP has been submitted at Deadline 2 (J5/F02)..

Reference	Written Representation Comment	Applicants' response
	Road closures elsewhere on the local road network can cause displacement and confusion and this will require mitigation from the Applicants. It is also essential that access to existing car parks is retained.	
REP1-068 6.2.7	As set out within the previous chapter, there are significant highways implications to the Scheme which would have a direct impact upon tourism without further assessment, given the duration of works proposed.	The Applicants refer to REP1-068- 5.2.3 above in regard to commitments to avoid road closures through design of the Transmission Assets construction commitments, and REP1-068-5.4.1 regarding the Transmission Assets use of Starr Gate. The Applicants have amended the OCTMP at Deadline 2 to clarify that the route will not be used by HGVs. The updated OCTMP has been submitted at Deadline 2 (J5/F02)..
REP1-068 6.3.1	<i>Mitigation / Adequacy of the DCO against Tourism Impacts</i> Thorough reporting of visitor numbers to Blackpool and the wider Lancashire region is undertaken on a regular basis. As part of the works, these numbers should continue to be monitored and any losses and impacts identified.	The Applicants do not see a necessity to monitor to visitor numbers to Blackpool as the construction interaction is minimised. This detailed within REP1-068- 5.2.3 in regard to commitments to avoid road closures through design of the Transmission Assets construction commitments, and REP1-068-5.4.1 regarding the Transmission Assets use of Starr Gate. The Applicants have amended the OCTMP at Deadline 2 to clarify that the route will not be used by HGVs. The updated OCTMP has been submitted at Deadline 2 (J5/F02)..
REP1-068 6.3.2	Works in the vicinity of Starr Gate and Squires Gate Lane which may lead to disruption or closure may potentially impact negatively on existing businesses, residents and tourists. It is therefore requested that the Applicant assess this possible impact and provide appropriate mitigation where necessary.	The Applicants refer to REP1-068- 5.2.3 in regard to commitments to avoid road closures through design of the Transmission Assets construction commitments, and REP1-068-5.4.1 regarding the Transmission Assets use of Starr Gate. The Applicants have amended the OCTMP at Deadline 2 to clarify that the route will not be used by HGVs. The updated OCTMP has been submitted at Deadline 2 (J5/F02)..
REP1-068 6.3.3	A clear and final programme of works should be issued for consideration at the earliest stage, including the extent of any proposed closures. Should conflict be identified with visitor-based events, mitigation should be provided. This should be wholly considered within the Construction	The Applicants refer to REP1-068- 5.2.3 in relation to road closures and REP1-068- 5.3.1 in regard to managing traffic movements during events.

Reference	Written Representation Comment	Applicants' response
	Traffic Management Plan, taking into account the increased number of vehicles and pedestrians expected during key holiday periods. This would require appropriate management by the Applicants to ensure safe access is retained and that there would be no short- or longer-term impact on tourist activity, which is of significant importance to the Fylde coast.	
REP1-068 6.3.4	For the period of the works, the Applicants must ensure that key tourism destinations remain legible and accessible, including visitor car parks. Mitigations must be balanced to ensure that local residents are not unduly impacted by the proposed works. The Applicants must consider that those affected may not just be local to the area, particularly during the holiday season. Tourism is important to the local economy and must be fully assessed as the potential impact upon tourism is considered to be high.	<p>The Applicants confirm that key tourism destinations will remain legible and accessible, including visitor car parks.</p> <p>The Applicants acknowledge that tourism is important to the local economy. A full assessment on tourism has been undertaken in Volume 4, Chapter 2: Socio-economics (APP-141) and a clarification note has been provided responding to Hearing Action Points ISH1 52 (REP1-046), which includes a summary of the assessment of potential significant effects on the visitor economy, where effects are 'not significant in EIA terms'.</p>
REP1-068 6.3.5	Works in one area may cause displacement effects and ultimately impact a wider area, such as through the movement of sand. Further information and certainty as to the proposed works is required on the extent of works so that the potential for these impacts can be considered.	<p>The tourism impact assessment is based on the maximum design scenario set out within Table 2.30 of Volume 4, Chapter 2: Socio-economics (APP-141) whereby the significance of effect on tourism receptors is assessed on the basis of the greatest impact duration.</p> <p>It can be clarified that the installation of the direct pipe beneath the sand dunes will not involve 'movement of sand' and therefore no direct impacts to this area. Please refer to section 3.14.3 of Volume 1., Chapter 3: Project description (F1.3/F03).</p>
REP1-068 6.4.1	<i>Impacts on Recreation</i> In assessing impacts upon recreation, the following documents have been considered; Volume 3 Chapter 6 (Land Use and Recreation) of the Environmental Statement, Public Rights of Way Plan ('PRoWP') and the Outline Public	The Applicants note this response.

Reference	Written Representation Comment	Applicants' response
	Rights of Way (PRoW) Management Plan ('OPRoWMP').	
REP1-068 6.4.2	The beach at Starr Gate plays an important role for the local community in providing space for recreational activities. Local dog walkers, runners, walkers and those involved in watersports frequently utilise the beach here to undertake these activities. Any restriction in the ability to carry out such activities would have a detrimental impact upon local residents both in terms of their physical and mental wellbeing.	<p>Volume 1, Annex 5.1: Human health (APP-035) considers physical and mental wellbeing effects of the project and has specific regard to access to areas to public opens spaces, including beaches, and public rights of way (see section 1.12.3). This assessment is informed by Volume 3, Chapter 6: Land use and recreation (APP-104), which confirms that the landfall construction works may require an area of beach to be closed to public access temporarily, however recreational access to the beach will be maintained.</p> <p>Section 2.5.2 of the Applicants Response to Relevant Representations Part 1 – Introduction and thematic responses (PDA-005) provides a detailed response in relation to beach access during construction. In addition, Annex 5.3 to the Applicants Response to Hearing Action Points ISH1: 13, 14, 16, 17 (REP1-040) provides further context and clarification around the works that will be undertaken on the beach and how public access will be managed and maintained on the beach. For the avoidance of doubt, access will be maintained along the beach during construction, operation and decommissioning of the Transmission Assets.</p> <p>Appendix A of the Outline Public Rights of Way (PRoW) Management Plan (AS-048) provides detail regarding public access at Lytham St Annes Beach. For activities on the beach, from the direct pipe exit pits to Mean Low Water Springs (such as for direct pipe installation and offshore cable pull-in and burial), a section of the beach would need to be temporarily closed off to public access, for short durations, while certain activities are taking place. In such cases, the Applicants will implement managed crossings either to the seaward or landward side to allow users to maintain access across the beach.</p> <p>Detailed management measures for how such closures at the Beach would be undertaken will be agreed with the relevant local authorities as part of the detailed PRoW Management Plan(s) secured through Requirement 8 of Schedules 2A and 2B of the draft DCO (REP1-008).</p> <p>Volume 1, Annex 5.1: Human health (APP-035) 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</p>

Reference	Written Representation Comment	Applicants' response
		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).
REP1-068 6.4.3	The PRoWP identifies that both the National Cycle Route 62 and Lancashire Coastal Way where they run along Starr Gate would be impacted by the proposals. The dDCO states that this may be temporarily closed, altered or diverted. For BBC to adequately understand the impact that the closure of this access would have, further information is required on the extent and duration of the closure and proposed diversions. At present, it does not appear that a diversion has been identified for users of the cycle route travelling in either direction, although it is assumed users would be expected to join the highway along this stretch north and south of the tram depot.	Table 1.2 of the Outline Public Rights of Way Management Plan (AS-048), (which is secured by Requirement 8 of the draft Development Consent Order (C1/F04)) identifies the proposed management measures to be adopted for the Transmission Assets. Trenchless techniques are proposed at the locations of both NCR 62 and the Lancashire Coastal Way, where no management measures are therefore proposed and no closure or diversion is likely to be necessary.
REP1-068 6.4.4	Bridleway 11 runs north-south to the east of the Airport. It is proposed on the OPRoWP that a central portion of this route would be temporarily closed or restricted due to the works where it travels across the order limits. The bridleway provides an important route between Blackpool and St. Annes, away from the main highway and its temporary closure would have a detrimental impact upon users who would need to consider alternative routes.	Table 1.2 of the Outline Public Rights of Way Management Plan (AS-048) (which is secured by Requirement 8 of the draft Development Consent Order (REP1-008)), identifies the proposed management measures to be adopted for the Transmission Assets. For Bridleway 11 it is proposed that a managed crossing would be implemented when required during the construction phase of Transmission Assets to enable the route to remain accessible to users. Bridleway 11 would therefore not be closed entirely at any point. Prior to commencement of the relevant stage of the works detailed PRoW Management Plans will be prepared which will follow the principles in the Outline PRoW Plan and will require approval by the relevant planning authority following consultation with relevant stakeholders.

Reference	Written Representation Comment	Applicants' response
REP1-068 6.4.5	Whilst the airport represents a commercial facility, it also supports recreational pursuits, via recreational flights, training and experiences. The proposals currently identify access for the works through the Airport from Squires Gate Lane and this may impact upon the ability to access these facilities.	The Applicants refer BBC to REP1-068- 5.2.3 above which confirms that no public access routes within the BBC area will be closed.
REP1-068 6.4.6	The works may also affect Blackpool residents from accessing physical activities and recreational pursuits.	The Outline Public Rights of Way Management Plan (AS-048) and the Outline Open Space Management Plan (included at Appendix A of AS-048) contain outline measures to reduce, as far as possible, the effects of the Transmission Assets on users of Public Rights of Way and the beach and to maintain access to these assets. These plans, and therefore the measures they contain, are secured through Requirement 8 of Schedules 2A and 2B of the draft Development Consent Order (REP1-008)).
REP1-068 6.5.1	<p><i>Mitigation / Adequacy of the DCO against Recreational Impacts</i></p> <p>Closure of, and restriction to, recreational routes should be limited to that absolutely necessary to undertake the works. Further detail should be provided to BBC in respect of the proposed closures and assessment of the potential impacts. Clear signage and publicity would be required to advise users of any closure that may impact upon their daily routine ahead of time. Should any damage be caused to these routes or the beach this should be subject to appropriate mitigation measures to enable its continued use in the future once works are completed.</p>	<p>The Outline Public Rights of Way Management Plan (AS-048) and the Outline Open Space Management Plan (included at Appendix A of AS-048), contain outline measures to reduce, as far as possible, the effects of the Transmission Assets on users of Public Rights of Way and the beach. These plans, and therefore the measures the contain are secured through Requirement 8 of Schedules 2A and 2B of the draft Development Consent Order (REP1-008). For the avoidance of doubt, access over the beach will be maintained during all construction activities.</p> <p>The Outline PRoW Management Plan at Section 1.5 includes reference to outline measures for signage, fencing and other potential management measures. However, prior to commencement of the relevant stage of the works detailed PRoW Management Plans will be prepared to include the detailed measures at each location, which will follow the principles in the Outline PRoW Plan and will require approval by the relevant planning authority following consultation with relevant stakeholders as required by Requirement 8 of Schedules 2A and 2B of the draft Development Consent Order (REP1-008).</p>

Reference	Written Representation Comment	Applicants' response
REP1-068 6.5.2	Appropriate compensation must be provided from the Applicant to mitigate any disruption, whether this be in the form of a fund or other benefit to residents (such as reduced energy costs as identified elsewhere within this report).	<p>The Applicants provided a response to the benefits for the local community in the Applicants response to Hearing Actions Points (REP1-037) ISH1_31.</p> <p>The Applicants have updated the Statement of Reasons (REP1-013), which now includes information on local community benefits to be realised as a result of the Transmission Assets.</p> <p>To ensure the benefits of the Transmission Assets can be realised at a local level, further engagement around community benefits will be undertaken by the Applicants with key local stakeholders who fall within the order limits of the Transmission Assets. Key local stakeholders will include, but not be limited to, local authorities, parish, community and/or town councils, elected representatives, as well as the newly formed Transmission Assets Steering Group.</p>
REP1-068 7.1.1	<p><i>Policies</i></p> <p><i>Blackpool Development Plan Policies</i></p> <p>Policy CS6 (Green Infrastructure) of the Core Strategy states that international, national and local sites of biological and geological conservation importance will be protected having regard to the hierarchy of designated sites and appropriate mitigation. Measures that seek to preserve, restore and enhance local ecological networks and priority habitats / species will be required where necessary.</p>	Policy CS6 is referred to in the Planning Statement (APP-233) and Local Planning Policy Tracker (APP-236).
REP1-068 7.1.2	Policy DM35 (Biodiversity) of the Local Plan Part 2 states that development proposals will be required to result in no loss or harm to biodiversity through avoidance, adequate mitigation or compensatory measures. Good design should provide net biodiversity gains. Development will not be permitted in or adjacent to an SSSI where it would adversely affect, directly or indirectly, its wildlife and nature conservation importance. The only exception is where the benefits of the	Policy DM35 is referred to in the Planning Statement (APP-233) and Local Planning Policy Tracker (APP-236).

Reference	Written Representation Comment	Applicants' response
	development clearly outweigh both its likely impact locally and any broader impacts.	
REP1-068 7.2.1	<i>Biodiversity Impacts</i> Matters of biodiversity have been assessed in relation to Volume 3 of the Environmental Statement, the Outline Ecological Management Plan ('OEMP') and Onshore Biodiversity Benefit Statement ('OBBS'), as submitted by the Applicants.	The Applicants acknowledges this response.
REP1-068 7.2.2	The principal concern in respect of biodiversity is that the Scheme would result in the loss and disturbance of habitats and introduce structures, such as lighting, which would fragment and sever ecological connectivity. 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. Natural England have provided a comprehensive response to the proposals, which BBC fully supports.	<p>The Applicants note these concerns.</p> <p>The Applicants have submitted an update to the outline Ecological Management Plan (J6/F02) and the Onshore Biodiversity Benefit Statement (J11/F03) at Deadline 2 which includes additional detail on the commitments to provision of ecological mitigation and biodiversity benefit areas associated with the Transmission Assets.</p> <p>Lighting has been assessed within section 3.11.11 of Volume 3, Chapter 3: Onshore ecology and nature conservation (APP-075) which identifies potential effects on bats, but with mitigation the effects would be minor adverse (not significant). Mitigation is secured via Requirement 12 (Ecological Management Plan) of Schedules 2A and 2B of the draft DCO (REP1-008).</p> <p>Management of artificial light emissions during construction is secured through Requirement 8 of Schedules 2A and 2B of the draft DCO (REP1-008) which requires approval and implementation of codes of construction practice for each stage of works. This includes a construction artificial light emissions management plan which must accord with the outline construction artificial light emissions management plan (APP-204).</p> <p>Responses to the comments raised in the Relevant Representation by Natural England have been submitted at the Procedural Deadline in the Applicants response to RR – Natural England (RR-1601) – Appendix G (PDA-021), G1 (PDA-022) and Appendix H (PDA-023).</p>

Reference	Written Representation Comment	Applicants' response
REP1-068 7.2.3	Of particular concern to BBC is the impact of the proposals upon the Lytham St. Annes Dunes and Ribble Estuary SPA's and SSSI's and also in respect of the potential relocation of wintering birds in association with land close to Blackpool Airport. Given the airport's operations, the site is subject to bird hazard management to dissuade birds from utilising the land for nesting, feeding or roosting. Any proposals should seek to reduce the potential of bird strike resulting from birds being moved off-course and creating a collision risk with an aircraft.	<p>The Applicants highlight that the Transmission Assets have committed to trenchless techniques beneath the Lytham St. Annes Dunes. Lytham St Annes Dunes SSSI is assessed within section 3.11.4 of Volume 3, Chapter 3: Onshore ecology and nature conservation (APP-075). With secondary mitigation in place in the form of hydrogeological risk assessment(s), the effects on the dunes would be minor adverse (not significant). This is secured via Requirement 8 (Code of Construction Practice) of Schedules 2A and 2B of the draft DCO (REP1-008). A Preliminary Hydrogeological Risk Assessment will be submitted to the Examining Authority during the Examination.</p> <p>In terms of the Ribble and Alt Estuaries SPA, this is assessed within Volume 3, Chapter 4: Onshore and intertidal ornithology (APP-090). The Applicants met with Natural England on 28 April 2025 to discuss potential ornithological impacts, as set out within the Applicants' response to ISH1_33 (REP1-037).</p> <p>The Applicants do not consider that the projects will increase or alter the risk posed by bird strike to aircraft operating out of Blackpool Airport or that the projects will create an increased risk to public safety. The Applicants are committed to working with Blackpool Airport and other stakeholders (including BAE Systems) to ensure that stakeholders are confident in the Applicants' assessment conclusions and that Blackpool Airport's existing safeguarding systems and wildlife hazard management plan (required under CAP 772) can continue to be complied with. The Applicants have engaged with Blackpool Airport on a strategy for preparing an outline Wildlife Hazard Management plan for the Transmission Assets. This commitment is explained within the Strategy for Wildlife Hazard Management Plan (S_D2_14) submitted at Deadline 2 and has been sent to Blackpool Airport.</p> <p>An outline of the proposed steps was discussed with Blackpool Airport on 9th May, and the Strategy for Wildlife Hazard Management Plan (S_D2_14) was sent to Blackpool Airport on 29th May. The document outlines the steps that the Applicants are proposing to undertake to work with Blackpool Airport. Comments were received from Blackpool Airport and amendments were made accordingly.</p> <p>A further technical meeting is currently being arranged.</p> <p>It is the Applicants' position that the existing Bird Strike Risk Assessment that is currently in place at Blackpool Airport (as per the requirements of CAP 772 Wildlife hazard management at aerodromes) would be updated to ensure that, in the unlikely event there would be any changes in bird strike risk as a consequence of the Transmission Assets mitigation, the existing technical</p>

Reference	Written Representation Comment	Applicants' response
		mitigation solutions remain appropriate. This would ensure that Blackpool Airport remain in control of the Bird Strike Risk Assessment, but the Applicants would be required to provide relevant information to inform this through (i) an agreed approach to monitoring and (ii) evidence on the likely additional attraction, if any, of birds to the wildlife zone. The principles of this approach have been agreed with Blackpool Airport as a robust approach in respect of their concerns on bird strike and will be further discussed at the next technical meeting.
REP1-068 7.2.4	A temporary construction mitigation area is proposed at Lytham Moss to mitigate potential impacts on geese, swan and wader habitats. This land falls within Blackpool Airport's safeguarding / bird hazard area and is subject to existing arrangements to manage bird levels. Any increase to current levels could pose a further bird strike risk and represent a significant safety risk to aircraft utilising the Airport. The proposed construction compound to the east of Queensway (works package 18A/B) also lies within the Airport's safeguarding / bird hazard area and could itself become an attraction to birds leading to a risk of bird strike unless managed appropriately. This requires further clarification from the Applicants.	As per the response to REP1-068 7.2.3, a strategic proposal technical note wildlife hazard management has been issued to the Examining Authority at Deadline 2 (S_D2_14).
REP1-068 7.3.1	<i>Mitigation/adequacy of the DCO against biodiversity impacts</i> Further surveys are required to consider the impact of the proposals, particularly with regard to how the works could alter existing conditions.	The scope of the ecology baseline surveys was agreed at an early stage in the project through extensive consultation with stakeholders through the Expert Topic Group (ETG) meetings. Further baseline data would not change the nature conservation evaluation of Important Ecological Features (IEFs) that were taken forward into the impact assessment or change the outcome of the impact assessment and the identification of ecological mitigation requirements.

Reference	Written Representation Comment	Applicants' response
REP1-068 7.3.2	It is considered that a reduction in the area of land within the order limits would reduce the potential impacts whilst still enabling the Scheme to proceed in the same form.	A maximum design envelope for the onshore export cable corridor has been identified within which the final design will sit. This allows flexibility for elements that are likely to require more detailed design subsequent to securing consent. This will reduce the area required for the Transmission Assets, thereby reducing any potential impacts. Until detailed design has been undertaken, it is not feasible to reduce the Order limits further.
REP1-068 7.3.3	Consideration should be given to elements of the construction and decommissioning periods which may have a detrimental impact on biodiversity, namely lighting, vibration, noise and air pollution. Lighting should be designed appropriately for the location and activities limited to reduce potential impacts.	See response to REP1-068 7.2.2 above with respect to the effect of lighting on bats. In accordance with CoT28, lighting will be positioned to avoid unnecessary illumination to sensitive ecological receptors. It is secured via Requirements 8 and 12 (Code of Construction Practice and Ecological Management Plan) of Schedules 2A and 2B of the draft DCO (REP1-008) Noise and vibration is considered in section 3.11.2 of Volume 3, Chapter 3: Onshore ecology and nature conservation (APP-075) and within Volume 3, Chapter 4: Onshore and intertidal ornithology (APP-090). Air pollution is assessed in Volume 3, Chapter 9: Air quality (APP-121). The Applicants have made a commitment (CoT33 and CoT79 of Volume 1, Annex 5.3: Commitments Register of the ES (F1.5.3/F03)) to prepare Noise and Vibration Management Plan(s) and Dust Management Plan(s) to reduce potential impacts. These are secured by Requirement 8 within Schedules 2A & 2B of the draft DCO (REP1-008).
REP1-068 8.1.1	<i>Airport Operations Policies</i> <i>National Policy Statements</i> The NPS includes significant protections for airports and associated infrastructure, particularly defence. Paragraph 5.5.59 continues these protections and states as follows: <ul style="list-style-type: none"> “Where, after reasonable mitigation, operational changes, obligations and requirements have been proposed, the Secretary of State should consider whether: 	The Applicants welcome this response and are working with Blackpool Airport (BA) to ensure that BA's obligations under the Air Navigation Order (ANO, 2016) and its requirements to the CAA, under its Aerodrome License (regulatory compliance), are safeguarded (for continued aerodrome safe operations); primarily achieved through adherence to the CAP791 requirements.

Reference	Written Representation Comment	Applicants' response
	<ul style="list-style-type: none"> A development would prevent a licensed aerodrome from maintaining its licence and the operational loss of the said aerodrome would have impacts on national security and defence, or result in substantial local / national economic loss, or emergency service needs It would cause harm to aerodromes' training or emergency service needs The development would impede or compromise the safe and effective use of defence assets or unacceptably limit military training The development would have a negative impact on the safe and efficient provision of en-route air traffic control services for civil aviation, in particular through an adverse effect on CNS infrastructure" 	
REP1-068 8.1.2	The NPS safeguards airports which are a safeguarded airport and / or where the airport is used for defence purposes. Operations undertaken at Blackpool Airport, includes defence and HM Coastguard.	The Applicants refer BBC to REP1-068 8.1.1 above in relation to the Applicants working with Blackpool Airport.
REP1-068 8.1.3	<i>Blackpool Development Plan Policies</i> Policy DM8 (Blackpool Airport Enterprise Zone) sets out guidance on development within this designation with the Council supporting the sustainable development of the EZ to create more businesses and jobs and attract international investment with positive benefits for the sub-regional economy and increasing the contribution	The Applicants refer BBC to REP1-068 8.1.1 above in relation to the Applicants working with Blackpool Airport.

Reference	Written Representation Comment	Applicants' response
	to national growth. In supporting development at the EZ, the viable long-term operation of Blackpool Airport must be maintained.	
REP1-068 8.1.4	Policy DM42 (Aerodrome Safeguarding) advises that the Blackpool Airport Authority and the Ministry of Defence (MoD) will be consulted on all development proposals as appropriate within the aerodrome safeguarding area/zones shown on the Policies Map to ensure there is no adverse impact on airport safety at Blackpool Airport or Warton Aerodrome.	The Applicants are working with both BAE Systems (Warton with the MOD Defence Infrastructure Organisation (DIO)) and Blackpool Airport (BA) to ensure that their obligations under the Air Navigation Order (ANO, 2016) and under their Aerodrome License (regulatory compliance) are safeguarded (for continued aerodrome safe operations).
REP1-068 8.2.1	<i>Impacts on Airport Operations</i> <i>General Considerations</i> The Airport comprises a key economic driver within the Fylde Coast region. The site currently facilitates business and executive travel, flying schools, aviation training, bespoke fire training and specialist medevac services.	The Applicants are working with Blackpool Airport (BA) to ensure that BA's obligations under the Air Navigation Order (ANO, 2016) and its requirements to the CAA, under its Aerodrome License (regulatory compliance), are safeguarded (for continued aerodrome safe operations); primarily achieved through adherence to the CAP791 requirements.
REP1-068 8.2.2	The Scheme as currently proposed would impact upon the operational Airport in the following ways: <ul style="list-style-type: none"> • Temporary possession sought over parts of the Airport site in relation to construction access and temporary works areas; • Various permanent rights sought which reflect the Scheme's offshore export cables being proposed to connect onshore at transition joint bays to be 	The Applicants and Blackpool Airport have been in detailed discussions and negotiations regarding the works on Blackpool Airport's operational land for many months. The key principle that the Airport requires to underpin the design of the Projects works is that Blackpool Airport are able to ensure the continued safe, efficient and uninterrupted operation of the Airport. The construction techniques and permanent access rights to be used within Blackpool Airport are some of the matters currently under discussion with Blackpool Airport. The Applicants are confident that through those discussions the concerns raised can be addressed in full.

Reference	Written Representation Comment	Applicants' response
	located within the Airport site, from which export cabling is proposed to then run through the Airport site and across the main runway.	
REP1-068 8.2.3	As set out in BBC's and Blackpool Airport's Relevant Representations, the Scheme, during the construction, operational and decommissioning phases, has the potential to cause substantial disruption and adverse impacts on the Airport's operations, through direct construction activities proposed on-site, the loss or temporary loss of airport facilities and the potential for conflict and interference with the Airport's operations. All would have a significant impact upon both safe aviation activities and the commercial operations of the Airport, as well as its reputation for remaining open, which as experienced following a temporary closure in 2014 would adversely impact the airport's ability to attract corporate and leisure aviation. BBC fully support the Airport's representations to this examination.	The Applicants refer to REP1-068 8.2.2 above.
REP1-068 8.2.4	The Airport has a regulatory obligation to ensure that its aviation infrastructure remains active and operational at all times. It is not economically viable for the Airport to be subject to closure for any length of time. Disruption to services would result in air traffic having to be diverted elsewhere and in instances such as this, in the experience of BBC, users do not return to using the original facility once it is operational again and the knock-	The Applicants refer to REP1-068 8.2.2 above.

Reference	Written Representation Comment	Applicants' response
	on effect to the reliability and reputation of the airport would be prohibitive to its future. The level of impact that the proposals may have on the Airport are not yet fully understood and this would depend upon the method of cable installation used. Open trenching within the airport boundary would be wholly unsupported by BBC based upon the aforementioned impact it would have on the airport's operations. Therefore, further information on the construction methodology and depth of cables is required to allow necessary assessment as to whether this is appropriate in relation to airport operations and that any mitigation and safeguarding can be put in place. It is also necessary to understand how the retention post-installation of the cables could impact future use of the land.	
REP1-068 8.2.5	<p><i>Access to airport facilities</i></p> <p>As referenced elsewhere in this report, the airport has a key role in supporting emergency services and matters of defence (including North West Airport Ambulance, the National Police Air Service and the Coastguard). These operations may fall outside of the airport's normal operational hours but cannot be compromised. The Airport also hosts the military for various purposes, including Southport and Blackpool Airshows (including the Red Arrows), training flights and defence training exercises, as well as being a named alternative airfield for Warton Aerodrome, which is operated by BAE Systems. As such, it is of the utmost importance that BBC has sufficient information to allow an assessment of any impact upon these</p>	<p>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 (REP1-008).</p> <p>The northern access route through Blackpool Airport is an operational access. The Project Description states that no construction is proposed for operational accesses. Operational accesses for the onshore export cable corridor and 400kV grid connection cable corridor would typically be accessed using a Light Goods Vehicle or other 4x4 or multi-terrain vehicle. However, no vehicles are proposed to be used along PRow's or bridleways for operation and maintenance activities. The Applicants response to ISH1_38 within REP1-037 states the vehicle movements associated with the planned operation and maintenance hours will be updated from 07:00 – 23:00 to 07:00 – 19:00. An update to the Commitments Register (F1.5.3/F03F1.5.3/F03) has been submitted at Deadline 2.</p>

Reference	Written Representation Comment	Applicants' response
	existing services. If the access road from Squires Gate Lane was closed off for any period of time this would impact upon the existing emergency services rendezvous point and access to the VSP (Vehicle Search Point) building, staff access to the airport and fuel deliveries, amongst other operations. The existing one-way access route at the airport is not wide enough to be made two-way and as such, concerns arise regarding maintaining access and egress should the road be blocked.	The use of the northern access route is one of the matters currently under discussion with Blackpool Airport and Blackpool Council. The Applicants are confident that through those discussions the concerns related to the northern access can be addressed in full.
REP1-068 8.2.6	It is unclear why such a wide works corridor is proposed, which arcs across Runway 28. This should be reduced and moved away from the runway to enable its operation to be maintained.	The Applicants refer BBC to REP1-068 8.2.5 above which provides clarity regarding the northern access route from Squires Gate Lane.
REP1-068 8.2.7	The construction and decommissioning phases have the potential to generate dust and there are concerns in respect of the potential impact of foreign object debris (FOD) resulting from the Scheme which currently proposes to route construction traffic down the main taxiway. FOD refers to any object in an airport environment which could injure personnel or damage aircraft. Any such object would create potential safety hazards and impact operations at the airport. The mitigation proposed would need to be wholly effective with constant supervision during the works to prevent this taking place. This should be set out fully within the Dust Management Plan.	<p>The Applicants and Blackpool Airport have been in detailed discussions and negotiations regarding the works on Blackpool Airport's operational land for many months. The key principle that the Airport requires to underpin the design of the Projects works is that Blackpool Airport is able to ensure the continued safe, efficient and uninterrupted operation of the Airport.</p> <p>The construction techniques to be used within Blackpool Airport, extent of the works corridor, dust and foreign object debris, nav aids and new matters that have arisen since submission of Relevant Representations are all matters currently under discussion with Blackpool Airport. The Applicants are confident that through those discussions the concerns raised can be addressed in full.</p>

Reference	Written Representation Comment	Applicants' response
REP1-068 8.2.8	It is unclear what consideration has been given to below ground telecommunications at the airport and the St Anne's NATS radar station which also serves Manchester Airport and can be affected by vibrational and dust impacts. The operational phase of the Sc has potential to adversely affect future radar, current and future Nav aids and other aspects of the Airport's operations and infrastructure, such as from the electromagnetic fields of the cables and potential EMI (Electro Magnetic Interference). Further information is required from the Applicant's in respect of these matters.	<p>The Applicants refer BBC to REP1-068 8.2.7 above, which provides clarity regarding the ongoing discussions with Blackpool Airport's continued safe, efficient and uninterrupted operation of the airport.</p> <p>The Applicants confirm that they are working with BA to understand the possible nature and extent of any EMI effect (if any).</p> <p>BA will be consulted on the output of any studies, and should any mitigation be required (which the Applicants do not consider likely) the scope of such mitigation will be aligned with BA. The Applicants note the scope requests provided by BA and are considering this within the context of the information to be required in support of the CAP791 process and the relevant industry guidance on EMF assessments for underground cables inside the airport perimeter.</p>
REP1-068 8.2.9	<i>dDCO Considerations</i> In reviewing the dDCO, it is noted that Schedule 2A, Article 17 references that in works no. 21A a written scheme for the management and mitigation of internal and external artificial light emissions should be submitted to the relevant planning authority before being brought into operation. It is considered that given the sensitive nature of the location and its operations, the same should be required for any lighting required throughout the works programme where needed for works in and adjacent to the Airport.	The Applicants note that Requirement 17 is for the management of operational light emissions at the substations. Management of artificial light emissions during construction is secured through Requirement 8 which requires approval and implementation of codes of construction practice for each stage of works. This includes a construction artificial light emissions management plan which must accord with the outline construction artificial light emissions management plan (APP-204).
REP1-068 8.2.10	The dDCO also references unexploded ordnance in respect of marine areas. Given the historic use of the Airport land, it is felt pertinent that consideration should be given to the potential of such items within the order limits across the airport.	<p>The Applicants have committed to implementation of detailed Code of Construction Practice(s) (CoCP) (commitment CoT35) secured through Requirement 8 of the draft DCO (C1). The outline CoCP (APP -193) explains the activities carried out in accordance with the definition of 'onshore site preparation works' (section 1.2.1.5). UXO are considered under 'surveys and investigations for the purpose of assessing ground conditions.</p> <p>The Applicants recognise that given the historic use of the Airport land that it has potential for UXO that may present challenges for safe construction of the Transmission Assets. To ensure</p>

Reference	Written Representation Comment	Applicants' response
		safe and appropriate construction, detailed ground investigations and UXO surveys will be undertaken post-consent to inform the final cable route design and construction methodology. These investigations will provide key information on ground conditions and UXO risk to ensure that the design and construction activities avoid or appropriately manage any associated risks.
REP1-068 8.2.11	Article 47, which deals with inconsistent planning permissions, may present instances of conflict with the article at the slipway area or within the Airport.	The Applicants note that Article 47 has been updated in the draft DCO submitted at Deadline 2 (C1/F04) to reflect the drafting most recently approved by the Secretary of State in the A122 (Lower Thames Crossing) Development Consent Order 2025. The Applicants note that the purpose of this drafting is to allow planning permissions and the Order to coexist.
REP1-068 8.3.1	<p><i>Mitigation / Adequacy of the DCO against Airport Operation Impacts</i></p> <p>Further information is required from the Applicants to adequately assess the potential impact of the proposed Scheme upon airport operations. The Applicants are required to ensure that any development does not compromise the ability to provide a safe and efficient Airport, operationally and for air traffic services. They should demonstrate, to the satisfaction of the Airport's safety management system and the CAA regulatory body, that they can prevent or adequately mitigate any direct or indirect impacts upon the safe operation of the airport and its commercial operations. A full safeguarding assessment should be undertaken that confirms the proposals are safe and have no impact on the Airport's operations prior to works commencing.</p>	The Applicants welcome this response and are working with Blackpool Airport (BA) to ensure that BA's obligations under the Air Navigation Order (ANO, 2016) and its requirements to the CAA, under its Aerodrome License (regulatory compliance), are safeguarded (for continued aerodrome safe operations); primarily achieved through adherence to the CAP791 requirements.

Reference	Written Representation Comment	Applicants' response
REP1-068 8.3.2	BBC cannot accept any closure of the Airport to facilitate the Scheme, this must be incorporated into the DCO through a protective provision. As such, the order boundary should be amended so as to not impact upon the operational runway and an alternative approach brought forward.	<p>The Applicants and Blackpool Airport have been in detailed discussions and negotiations regarding the works on Blackpool Airport's operational land for many months. The key principle that the Airport requires to underpin the design of the Projects works is that Blackpool Airport is able to ensure the continued safe, efficient and uninterrupted operation of the Airport.</p> <p>Following discussion with BAOL, the Applicants have updated Requirements 8, 10 and 12 of the draft DCO (C1) submitted at Deadline 2 to include BAOL as a named consultee. Relevant updates to the related outline management plans will be submitted at Deadline 3.</p>
REP1-068 8.3.3	The final solution for installation of onshore export cables should be confirmed so that a full assessment can be made. As discussed, the use of open cut trenching in this location is not supported by BBC.	<p>The Applicants and Blackpool Airport have been in detailed discussions and negotiations regarding the works on Blackpool Airport's operational land for many months. The key principle that the Airport requires to underpin the design of the Projects works is that Blackpool Airport are able to ensure the continued safe, efficient and uninterrupted operation of the Airport.</p> <p>The construction techniques to be used within Blackpool Airport is one of the matters currently under discussion with Blackpool Airport. The Applicants are confident that through those discussions the concerns raised can be addressed in full.</p>
REP1-068 8.3.4	Further assessment should be undertaken to consider the vibrational and dust impacts of works within the vicinity of the airport upon sensitive airport equipment and use of the runways. It is proposed by BBC that airport equipment must be replaced prior to any construction works taking place.	<p>The Applicants and Blackpool Airport have been in detailed discussions and negotiations regarding the works on Blackpool Airport's operational land for many months. The key principle that the Airport requires to underpin the design of the Projects works is that Blackpool Airport are able to ensure the continued safe, efficient and uninterrupted operation of the Airport.</p> <p>The construction techniques to be used within Blackpool Airport is one of the matters currently under discussion with Blackpool Airport. The Applicants are confident that through those discussions the concerns raised can be addressed in full.</p>
REP1-068 9.1.1	<p><i>Economic Development Policies</i></p> <p><i>National Policy Statements</i></p> <p>The NPS recognises that the construction, operation and decommissioning of energy infrastructure may have socio-economic impacts</p>	The Applicants have engaged with the relevant local authorities throughout the application process to gain an understanding of local and regional issues and opportunities (refer to Technical Engagement Plan (APP-189)).

Reference	Written Representation Comment	Applicants' response
	at local and regional levels. Parts 2 and 3 of EN-1 of the NPS set out some of the national level socio-economic impacts. The NPS “strongly encourages” and Applicant to engage with relevant local authorities during early stages of scheme development so that the Applicant can gain a better understanding of local or regional issues and opportunities.	
REP1-068 9.1.2	The NPS states that the Applicant’s assessment should consider all relevant socio-economic impacts, which may include: the creation of jobs and training opportunities. Applicants may wish to provide information on the sustainability of the jobs created, including where they will help to develop the skills needed for the UK’s transition to Net Zero the contribution to the development of low-carbon industries at the local and regional level as well as nationally.	Socio-economic impacts are considered in Volume 4, Chapter 2: Socio-economics (APP-141). An outline employment and skills plan (APP-239) has been prepared, which supports the transition to net zero. The Applicants have made a commitment (CoT57 of Volume 1, Annex 5.3: Commitments Register of the ES (F1.5.3/F03)) to prepare Employment and Skills Plan(s). These are secured by Requirement 19 within Schedules 2A & 2B of the draft DCO (C1).
REP1-068 9.1.3	EN-1 at paragraph 5.13.12 states that the Secretary of State may wish to include a requirement that specifies the approval by the local authority of an employment and skills plan detailing arrangements to promote local employment and skills development opportunities, including apprenticeships, education, engagement with local schools and colleges and training programmes to be enacted.	Refer to REP1-068 9.1.2 above.

Reference	Written Representation Comment	Applicants' response
REP1-068 9.1.4	<i>Blackpool Development Plan Policies</i> Policy CS3 (Economic Development and Employment) of the Core Strategy promotes sustainable economic development including promoting land in South Blackpool as a strategic priority. To improve employment opportunities the Council will seek to develop and deliver an effective skills agenda.	Refer to REP1-068 9.1.2 above.
REP1-068 9.1.5	Policy CS24 (South Blackpool Employment Growth) of the Core Strategy states that the Council will support sub-regional economic growth in South Blackpool, including: Blackpool Airport Corridor and lands close to Junction 4 of the M55.	The Applicants note this comment.
REP1-068 9.1.6	Policy DM8 (Blackpool Airport Enterprise Zone) of the Local Plan Part 2 supports the sustainable development of the EZ to create more businesses and jobs and attract international investment with positive benefits for the sub-regional economy and increasing the contribution to national growth. In supporting development at the EZ, the viable long-term operation of Blackpool Airport must be maintained.	<p>The Applicants acknowledge BBC's comment about supporting development that would facilitate the Enterprise Zone's objectives. An outline employment and skills plan (APP-239) has been prepared, The Applicants have made a commitment (CoT57 of Volume 1, Annex 5.3: Commitments Register of the ES (F1.5.3/F03)) to prepare Employment and Skills Plan(s). These are secured by Requirement 19 within Schedules 2A & 2B of the draft DCO (REP1-008), noting that the outline Employment and Skills Plan (APP-239) sets out that there will be future consultation with stakeholders, which includes local authorities.</p> <p>Regarding the long-term operation of Blackpool Airport, the Applicants and Blackpool Airport have been in detailed discussions and negotiations regarding the works on Blackpool Airport's operational land for many months. The key principle that the Airport requires to underpin the design of the Projects works is that Blackpool Airport are able to ensure the continued safe, efficient and uninterrupted operation of the Airport.</p>

Reference	Written Representation Comment	Applicants' response
REP1-068 9.2.1	<p><i>Impacts on Blackpool Airport Enterprise Zone</i></p> <p>The Scheme must not detrimentally impact upon the vision of the Blackpool Airport Enterprise Zone which is, to grow the Enterprise Zone to become a premier business location, where high quality businesses locate and facilitate economic growth and employment, and further develop the strong skills and knowledge base of residents along the Fylde Coast. BBC cannot accept works that would prevent development of land within Blackpool Airport or the Blackpool Airport Enterprise Zone boundaries. It is therefore necessary to understand the construction methods for the cable installation as well as any impacts their position may have on future use of the land during and post-operation of the wind farms. The use of the rights sought to ensure integrity of the cable infrastructure, such as preventing tree planting, materially altering ground levels, erecting buildings and storing substantial materials, needs to be understood by BBC to consider whether the Scheme sterilises the use of land for future development.</p>	<p>Negotiations are underway with Blackpool Council as landowner of the Airport to secure the necessary land rights for the Projects.</p> <p>Heads of Term have been issued to Blackpool Airport and Blackpool Borough Council, latest sent 19th March 2025, and acknowledged by both DWF and their appointed agent Peter Roberts. Engagement on Heads of Terms is progressing with the latest engagement on 1st May.</p> <p>Given the early, vision stage of proposals for the Blackpool Airport Enterprise Zone, the Applicants do not believe that Protective Provisions are necessary or appropriate. Protective provisions are used to protect existing infrastructure or undertakings, not as protections for future potential interactions which are only speculative at this stage. The Applicants are confident that any concerns Blackpool Council may have regarding land sterilisation can be managed through the land agreements currently under negotiation.</p>
REP1-068 9.2.2	<p>The Enterprise Zone seeks to attract over 280 no. new businesses and create circa. 5,000 new jobs over its lifespan. BBC will only support new development which would enable and facilitate the Enterprise Zone's objectives.</p>	<p>The Applicants acknowledge BBC's comment about supporting development that would facilitate the Enterprise Zone's objectives.</p>

Reference	Written Representation Comment	Applicants' response
REP1-068 9.2.3	It is appreciated that the presence of offshore wind farm developments may attract future occupiers who wish to benefit from its location, especially if this results in subsequent access to reliable and lower cost electricity supply.	The Applicants note this comment.
REP1-068 9.2.4	Works to implement the Enterprise Zone's vision are well underway and delays to the development of the Enterprise Zone should be discouraged. The installation of the CeltixConnect-2 cable has the potential to draw substantial investment to the Fylde Coast, including the Enterprise Zone, from those requiring a high performance internet access. Development which is expected to be brought forward in the near future comprises, a solar farm to the south of the airport runways, new airport facilities, such as new hangars and a new ATC tower and the implementation of Silicon Sands, including a landmark data centre. These developments are necessary to fulfil the Enterprise Zone vision and support its long-term future. Specific locations for some of this development, such as the cabling route from the proposed solar farm to the primary substation being constructed at Squires Gate has not yet been determined, and as such it is necessary to ensure that there is no conflict with this cabling and the transmission cables with final routing to be agreed upon by all parties.	The Applicants refer BBC to REP1-068 9.2.1 above regarding negotiations with Blackpool Council as landowner of the airport and its interaction with the Enterprise Zone.

Reference	Written Representation Comment	Applicants' response
REP1-068 9.2.5	The potential impact of works as part of this Scheme, delaying commencement or sterilising land which is marked for development cannot be understated.	The Applicants refer BBC to REP1-068 9.2.1 above regarding negotiations with Blackpool Council as landowner of the airport and its interaction with the Enterprise Zone. The Applicants are confident that any concerns Blackpool Council may have regarding delaying commencement or sterilisation of land can be managed through the land agreements currently under negotiation..
REP1-068 9.2.6	There may also be other impacts of the Scheme upon businesses in this location by way of direct and indirect effects of the construction and decommissioning period, including but not limited to, highways disruption impacting upon commuting and deliveries or impacts of noise and dust.	<p>The Applicants refer BBC to REP1-068 9.2.1 above regarding negotiations with Blackpool Council as landowner of the airport and its interaction with the Enterprise Zone.</p> <p>A full assessment on socio-economics has been undertaken in Volume 4, Chapter 2: Socio-economics (APP-141) and a clarification note has been provided responding to Hearing Action Points ISH1 52 (REP1-046), which includes a summary of the assessment of potential significant effects on the visitor economy, where effects are 'not significant in EIA terms'.</p> <p>The Applicants refer to REP1-068- 5.2.3 in regard to commitments to avoid road closures through design of the Transmission Assets construction commitments.</p>
REP1-068 9.3.1	To support BBC's understanding of the potential impacts of the Scheme upon the Enterprise Zone consideration should be given as to how the timing of the Scheme may affect the implementation of development in this location. The works plan indicates a large expanse of land south of the runway may be required which would extinguish development opportunities in this location for a significant time period. A solar farm is proposed for this location, subject to a screening opinion request to Fylde Borough Council currently, which would support development of Silicon Sands. As such, the Scheme may have cumulative negative impacts by preventing the solar farm coming forward, as uncertainty may stop end-users from moving to the Enterprise Zone.	The Applicants refer BBC to REP1-068 9.2.1 above regarding negotiations with Blackpool Council as landowner of the airport and its interaction with the Enterprise Zone.

Reference	Written Representation Comment	Applicants' response
REP1-068 9.3.2	There is a lack of information regarding the works within the airport and Enterprise Zone and whether these would directly impact upon the future design and scope of development in this location as it could remove design freedom and restrict potential plot sizes.	The Applicants refer BBC to REP1-068 9.2.1 above regarding negotiations with Blackpool Council as landowner of the airport and its interaction with the Enterprise Zone.
REP1-068 9.3.3	The Council will proactively communicate with the Applicants with regard to the possibility of energy production from the wind farms supporting operations within the Enterprise Zone and also wider provision for the residents of Blackpool.	The Applicants note this comment but cannot provide any assurances or guarantees regarding provision of electricity to any particular consumers. The responsibility of distribution of electrical capacity transferred to the grid belongs to National Energy System Operator (NESO) and therefore this is not within the control of the Applicants.
REP1-068 9.4.1	<i>Impact of land sterilization</i> The works as currently drafted in the Scheme would have a detrimental impact upon the ability of BBC to progress with earmarked schemes for development, particularly in respect of works and access arrangements proposed at Blackpool Airport and the Enterprise Zone. Sterilisation of land for future development would have a detrimental impact on the Council's economic goals for the borough and the status of the Fylde-Blackpool periphery as a strategic location for economic development. Partial sterilisation of Blackpool Airport for a short period of time, would result in major funding concerns for BBC.	The Applicants refer BBC to REP1-068 9.2.1 above regarding negotiations with Blackpool Council as landowner of the airport and its interaction with the Enterprise Zone.
REP1-068 9.4.2	Sterilisation of land identified to the south of Blackpool Airport for a solar farm development would prevent BBC from realising their vision for the Silicon Sands area of the Enterprise Zone, for which it would provide its own supply of renewable energy. To fully understand the impact	The Applicants refer BBC to REP1-068 9.2.1 above regarding negotiations with Blackpool Council as landowner of the airport and its interaction with the Enterprise Zone.

Reference	Written Representation Comment	Applicants' response
	of the proposals upon future development within Blackpool Airport and Enterprise Zone, accurate and final route identification for cable laying, as well as construction methodology and detail of depth of the cabling, must be provided by the Applicants. In summary greater clarity and certainty is required.	
REP1-068 9.5.1	<i>Mitigation / Adequacy of the DCO against impacts on Land Sterilisation</i> BBC request further information on the proposed method of works and access to the site work compounds within the Enterprise Zone boundary as the extent and duration of impacts would be dependent upon the method of cable installation. The lack of detail within the application documents results in unacceptable uncertainty over the specific cable route, cable depths and the method of installation.	The Applicants refer BBC to REP1-068 9.2.1 above regarding negotiations with Blackpool Council as landowner of the airport and its interaction with the Enterprise Zone.
REP1-068 9.5.2	The Construction Method Statement or Method of Works Plan must contain certainty over the depth, time periods and method of cable laying proposed across all areas prior to deadline ISH2 to enable any impacts upon BBC owned land to be adequately considered together with funding implications. Full details of the extent of repair and reinstatement following the construction and decommissioning periods must also be provided.	The Applicants refer BBC to REP1-068 9.2.1 above regarding negotiations with Blackpool Council as landowner of the airport and its interaction with the Enterprise Zone.

Reference	Written Representation Comment	Applicants' response
REP1-068 9.6.1	<p><i>Impact on Employment and Skills</i></p> <p>It is important that the Applicants work with their supply chains, contractors and local partners to recruit and train local people ahead of and during the construction period which would ensure that they develop their skills and are enabled to move between roles and different types of schemes. The Scheme, as part of the wider windfarm infrastructure projects, is an opportunity to generate skills and employment outcomes and subsequently contribute to the achievement of both national and local policy objectives. The presence of the Lancashire Energy HQ within the Enterprise Zone also provides opportunities for collaboration and supporting students with experience of local renewable energy schemes.</p>	<p>Refer to REP1-068 9.1.2 above.</p> <p>The Applicants acknowledge the comment about the Lancashire Energy HQ's location within the Enterprise Zone and would aim to collaborate with them, following award of consent.</p>
REP1-068 9.6.2	<p>As such, the Scheme could have some minor positive impacts on the local supply chain through investment in local job creation and businesses, to support delivery and installation of the Scheme. To maximise opportunities, BBC expect the Applicant to work with local stakeholders to develop programmes that would support local businesses to grow and offer their services to supply the Applicants Scheme. In this respect, the authority welcomes the Applicant's production of an Outline Employment and Skills Statement and trust that through a continued collaborative approach on this matter, the Scheme would provide socio-economic benefits in this form. BBC wish to work with the Applicant to ensure activities are co-ordinated to maximise the possible benefits and prepare an agreed final Employment and</p>	<p>The Applicants welcome this comment from BBC regarding the Employment and Skills Plan(s) and will continue to collaborate with the Council.</p>

Reference	Written Representation Comment	Applicants' response
	Skills Statement. To do so is in accordance with the policies set out in the NPS.	
REP1-068 9.7.1	<p><i>Mitigation / Adequacy of DCO against impacts on Employment and Skills</i></p> <p>The Applicants should provide a commitment to support the local skills base, which is able to be formalised through the provision of a finalised Employment and Skills Statement. Any employment and skills plan must include co-operation with the Blackpool & the Fylde College Lancashire Energy HQ to support the local community skills agenda.</p>	The Applicants welcome the opportunity to engage with the Blackpool & the Fylde College Lancashire Energy HQ to support the local community skills agenda, following development consent (as set out within the Outline Employment and Skills Plan (APP-239)).
REP1-068 9.7.2	<p>dDCO requirement 19 should be amended to include consultation with BBC alongside other authorities and provide greater certainty of delivery with specified timeframes and outcomes to be met. Any final Employment and Skills document should be subject to the Council's agreement rather than notification to ensure all relevant considerations have been addressed. BBC would also suggest that the requirements of the Plan be covered by a S106 agreement to ensure that they remain enforceable throughout the lifetime of the Scheme. Amendment is sought to the current drafting in the dDCO of requirement 19 to ensure greater certainty of delivery of apprenticeships and the use of local labour and</p>	The Applicants note BBCs comments and will engage with them to understand their specific drafting concerns, noting that the outline Employment and Skills Plan (APP-239) sets out that there will be future consultation with stakeholders, which includes local authorities such as BCC

Reference	Written Representation Comment	Applicants' response
	businesses during the construction and operational periods.	
REP1-068 9.7.3	BBC, alongside Fylde Borough Council, Wyre Council and South Ribble Borough Council, have worked together to prepare a Joint Social Value Proposal which sets out how the Scheme can support the local community. A draft version of this document is provided in Appendix 4 and BBC would welcome the Applicants participation in bringing the components of this forward throughout the Schemes lifetime.	The Applicants note this comment and welcome future engagement with the local authorities on these proposals to ensure the benefits of the Transmission Assets can be realised at a local level, and align with local planning policies, as appropriate.
REP1-068 9.8.1	In principle, BBC support renewable energy development and welcome potential opportunities for proximal energy supply to the Enterprise Zone from the wind farm developments, which would benefit the local economy and attract new businesses, particularly more energy intensive users, such as data centres, to the area. The potential for a thermal heating network would also present a range of benefits to the local community. Again, the Council are wholly supportive of working with the Applicants to review the potential ways in which the Scheme is able to support local communities, in accordance with the NPS.	The Applicants welcome BBC's support.

Reference	Written Representation Comment	Applicants' response
REP1-068 10.1.1	<p><i>Flooding and drainage infrastructure Policies</i></p> <p><i>National policy statements</i></p> <p>The NPS recognises that new energy infrastructure will typically need to remain operational over many decades, in the face of a changing climate. Consequently, applicants must consider the direct (e.g. site flooding, limited water availability, storms, heatwave and wildfire threats to infrastructure and operations) and indirect (e.g. access roads or other critical dependencies impacted by flooding, storms, heatwaves or wildfires) impacts of climate change when planning the location, design, build, operation and, where appropriate, decommissioning of new energy infrastructure.</p>	<p>This planning policy has been considered within Volume 3, Annex 2.3: Flood Risk Assessment (parts 1, 2 and 3) (REP1-022) (REP1-023) and (REP1-024)).</p>
REP1-068 10.1.2	<p>The NPS recognises the aims of planning policy on development and flood risk are to ensure that flood risk from all sources of flooding is taken into account at all stages in the planning process to avoid inappropriate development in areas at risk of flooding, and to steer new development to areas with the lowest risk of flooding. Additionally, the government's Flood and Coastal Erosion Risk Management Policy Statement sets out the ambition to create a nation more resilient to future flood and coastal erosion risk. It outlines policies and actions which will accelerate progress to better protect and better prepare the country against flooding and coastal erosion.</p>	<p>This planning policy has been considered within Volume 3, Annex 2.3: Flood Risk Assessment (parts 1, 2 and 3) (REP1-022) (REP1-023) and (REP1-024)).</p>

Reference	Written Representation Comment	Applicants' response
REP1-068 10.1.3	The NPS considers that substantial weight should be attached to the risks of flooding and coastal erosion and the Secretary of State should be satisfied that the Applicant has fully considered the policy on assessment and mitigation in paragraphs 4.3.1 to 4.3.9 of EN-1, taking account of the potential effects of climate change on these risks.	The 2023 NPS EN-1 policy relating to flood risk (paragraphs 5.8.1 – 5.8.42). has been considered within the preparation of the FRA (Volume 3, Annex 2.3: Flood Risk Assessment (parts 1, 2 and 3) (REP1-022) (REP1-023) and (REP1-024)).
REP1-068 10.1.4	<i>Blackpool Development Plan Policies</i> Policy CS9 (Water Management) of the Core Strategy requires new development to seek to reduce flood risk, manage the impacts of flooding and mitigate the effects of climate change. Appropriate mitigation and resilience measures should be incorporated to minimise the risk and impact of flooding from all sources and incorporate appropriate Sustainable Drainage Systems.	This planning policy has been considered within Volume 3, Annex 2.3: Flood Risk Assessment (parts 1, 2 and 3) (REP1-022) (REP1-023) and (REP1-024)).
REP1-068 10.1.5	Policy DM31 (Surface Water Management) of the Local Plan Part 2 sets out requirements for new developments. Surface water from development sites will be discharged via the most sustainable drainage option available. Approved development proposals will need to be supplemented by appropriate maintenance and management regimes for surface water drainage schemes.	This planning policy has been considered within Volume 3, Annex 2.3: Flood Risk Assessment (parts 1, 2 and 3) (REP1-022) (REP1-023) and (REP1-024)).
REP1-068 10.1.6	Policy DM33 (Coast and Foreshore) of the Local Plan Part 2 will support proposals which secure further improvements to bathing water quality or flood protection. Development proposals that would adversely affect the appearance, integrity	This planning policy has been considered within Volume 3, Annex 2.3: Flood Risk Assessment (parts 1, 2 and 3) (REP1-022) (REP1-023) and (REP1-024)).

Reference	Written Representation Comment	Applicants' response
	or environmental quality of the beach and foreshore will be resisted. The Coast and Foreshore is identified on the Policies Map.	
REP1-068 10.2.1	<i>Impacts upon Flood Risk and Drainage Flooding</i> BBC has a coastal location, bound to the west by the Irish Sea. The whole of the borough is relatively flat low-lying land which is protected in the west from coastal erosion and tidal inundation from the Irish Sea by concrete coastal defences, inspections of which are undertaken on an annual basis.	The Applicants note this response.
REP1-068 10.2.2	The dunes comprise a natural form of sea defence with capital funding from the Environment Agency to maintain and accrete them. Each year the addition of used Christmas trees are used to accrete the system and this has had a positive impact. Further information is required regarding the depth and method of laying the cables under the dunes to appropriately assess whether they would impact upon the stability of the dunes and their ability to function as a flood defence.	The Applicants have provided a detailed response with regard to sand dune flood defences previously and would refer the BBC to the response provided within RR-704.8 (PDA-006).
REP1-068 10.2.3	Flooding is a known issue within South Blackpool. The Blackpool Level 1 Strategic Flood Risk Assessment states that this is due to an over-reliance on, and inundation of, the public sewerage network and Council operated pumping station, as well as inadequate watercourse maintenance. In addition, the Fylde Strategic	The Applicants have provided a detailed response with regard to how flood risk has been assessed and mitigated for the onshore elements of the Transmission Assets previously and would refer the BBC to the response provided within RR-1262.9 (PDA-012).

Reference	Written Representation Comment	Applicants' response
	Flood Risk Assessment states that the main source of flooding within the area of Blackpool Airport is surface run off, as there are significant areas which are susceptible to sewer flooding due to the high concentration of combined sewers and the low hydraulic gradients within these areas.	
REP1-068 10.2.4	Due to this context, BBC has concerns in respect of potential flooding associated with the construction, decommissioning and maintenance of the Scheme.	The Applicants have provided a detailed response with regard to how flood risk has been assessed and mitigated for the onshore elements of the Transmission Assets previously and would refer the BBC to the response provided within RR-1262.9 (PDA-012).
REP1-068 10.2.5	Drainage Drainage concerns of BBC include the potential impact upon the current drainage infrastructure capacity and the risk of damage to BBC owned drainage infrastructure in this location.	<p>The Applicants have provided a detailed response with regard to how flood risk has been assessed and mitigated for the onshore elements of the Transmission Assets previously and would refer the BBC to the response provided within RR-1262.9 (PDA-012).</p> <p>The Applicants have not been made aware of drainage infrastructure that is owned and maintained by BBC, and request that this information be provided via the ongoing engagement for further consideration by the Applicants.</p> <p>Regardless, negotiations are underway with Blackpool Council as a landowner to secure the necessary land rights for the Projects.</p> <p>Heads of Term have been issued to Blackpool Airport and Blackpool Borough Council, latest sent 19th March 2025, and acknowledged by both DWF and their appointed agent Peter Roberts. Engagement on Heads of Terms is progressing with the latest engagement on 1st May. There has been no mention of Council owned drainage infrastructure in these discussions, but the Applicants welcome inclusion of any necessary protections via the ongoing landowner engagement.</p> <p>The Applicants note the Council's comment regarding the capacity of the current drainage infrastructure. The Applicants confirm that surface water runoff from the construction of the Transmission Assets will be managed in accordance with the Surface and Groundwater Management Plan (APP-202). The Surface and Groundwater Management Plan forms part of the Code of Construction Practice and is secured in Requirement 8 Schedule 2A and 2B of the draft DCO (REP1-008). The Surface and Groundwater Management Plan sets out measures to</p>

Reference	Written Representation Comment	Applicants' response
		manage surface water runoff and site drainage from the construction works. to avoid increasing the flood risk elsewhere.
REP1-068 10.2.6	The Scheme has the potential to result in flooding arising from improper or poorly managed dewatering during the construction period. Reference is made within the submission to <i>any water from dewatering activities being discharged in agreement with Lancashire County Council and/ or the Environment Agency to a local drainage ditch or watercourse and / or spread over ground</i> . It is considered that any dewatering in the location of Blackpool, Blackpool Airport Enterprise Zone and Blackpool Airport should be subject to agreement with the representatives of both Blackpool and Fylde Borough Council's drainage departments, given the potential implications to both authorities as administrative bodies and asset owners.	Dewatering is considered in Volume 3, Chapter 1: Geology, hydrogeology and ground conditions (APP-068). Representatives of both Blackpool and Fylde Borough Council's drainage departments will be consulted regarding the potential effects of dewatering on flooding via the discharge of the Surface and Groundwater Management Plan (APP-202). The Surface and Groundwater Management Plan forms part of the Code of Construction Practice and is secured in Requirement 8 Schedule 2A and 2B of the draft DCO (REP1-008). The Surface and Groundwater Management Plan sets out measures to manage surface water runoff and site drainage from the construction works to avoid increasing the flood risk elsewhere, including any discharge of water arising from dewatering activities.
REP1-068 10.2.7	Bathing Water Policy DM33 states that BBC will support schemes which improve bathing water quality or flood protection. Given the importance of tourism to the region it is important to the entire Fylde Coast that the quality of bathing water is not negatively affected, as it would have a measurable impact upon visitor numbers. This has been evidenced recently at Fleetwood when a sewage spill in June 2023 led to a temporary ban on bathing throughout the Blackpool coast. BBC is	As outlined in F2.2.2 Volume 2, Annex 2.2: Water Framework Directive coastal water assessment (APP-047) and F3.2.1 Volume 3, Annex 2.1: Water Framework Directive surface water and groundwater assessment (APP-071), there are a number of bathing waters associated with the Mersey Mouth coastal water body that have been considered in the WFD Assessment for the Transmission Assets. As identified in the WFD scoping detailed in these documents, which follows the Environment Agency Guidance " <i>Clearing the Waters for All</i> ," the Blackpool South bathing water to the north, the St Annes North bathing water within and the St Annes North Bathing water to the south are within 2km of the Transmission Assets Order Limits and have therefore the potential to be impacted. The level of <i>Escherichia coli</i> and intestinal <i>enterococci</i> are a determinant of water quality at designated bathing waters, and the presence of live bacteria is strongly influenced by the amount

Reference	Written Representation Comment	Applicants' response
	<p>concerned that without further evidence, the activities involved in bringing the transmission cables onshore would cause some deterioration (potentially temporary) in the quality of bathing waters. The beach water is randomly sampled 20 no. times per year at various locations by the Environment Agency to determine the classification. There are a number of schemes in place, such as the Dunes Scheme, Turning Tides and Fylde Peninsula projects which support bathing water quality campaigns and promotion of the beach.</p>	<p>of Ultraviolet light (UV) light penetrating the water column. Under lower UV scenarios, as occurs when Suspended Solid Concentrations (SSC) are high, survival of bacterium such as E. coli may increase. As outlined in F2.2.2 Volume 2, Annex 2.2: Water Framework Directive coastal water assessment (APP-047), open cut trenching for cable installation may disturb sediment, but works would occur during low water when the potential for sediment resuspension would be minimal. Furthermore, deposition of suspended sediment would occur during and immediately after cable installation, and SSC would reduce rapidly with distance from the cable installation site. Any increase in SSC (and potential bacterial contaminants) associated with cable installation would be temporary, intermittent and highly reversible and deterioration of bathing water quality is unlikely.</p> <p>Potential sources of bacterial or nutrient pressures from the land based construction activities within the contributing catchment of these bathing waters is considered in F3.2.1 Volume 3, Annex 2.1: Water Framework Directive surface water and groundwater assessment (APP-071).</p> <p>Pathogens are unlikely to be a source of contamination as the working area will be fenced off in advance of construction and the land application of slurry and manures in the working area will not occur in advance of construction. The location of septic tanks and their percolation area is not considered as a significant risk to bathing waters based on the bathing water profiles for the Blackpool and St Annes bathing waters. Any potential for septic tanks and their percolation area to be located within the construction area will be noted in pre-construction surveys and protective measures taken to ensure that they are not impacted. On this basis there will be no pathogen source within the working area during the construction period and therefore no potential to impact on the downstream coastal water bodies and associated bathing waters.</p> <p>Nutrient sources from the project will be limited with welfare facilities at the main compound and secondary compounds adequately managed through the site waste management plan. Particulate phosphorus export from sediment laden water will be adequately managed through soil management measures and pollution prevention measures. This will ensure that nutrient pressure that could result in algal blooms will not be a significant source from the Transmission Assets.</p> <p>In conclusion the activities involved in bringing the transmission cables onshore would be temporary, intermittent and highly reversible and deterioration of bathing water quality is unlikely.</p>

Reference	Written Representation Comment	Applicants' response
REP1-068 10.3.1	<p><i>Mitigation / Adequacy of the DCO regarding impacts of flooding and drainage</i></p> <p>Access for BBC must be maintained to the coastal defences throughout the construction and lifespan of the Scheme to allow necessary annual inspections to continue to take place.</p>	<p>The Applicants refer BBC to REP1-068 6.4.2 above in relation to access to the beach (and therefore access to maintenance of the coastal defences).</p>
REP1-068 10.3.2	<p>A Construction Surface Water Management Plan should be provided by the Applicant to identify how the proposals would prevent contamination of local watercourses during the construction and decommissioning stages. There would be a requirement for wheelwashing facilities during the construction and decommissioning stages.</p>	<p>The Applicants have committed to implementation of detailed Code of Construction Practice(s) (CoCP) (commitment CoT35) through Requirement 8 of Schedules 2A and 2B of the draft DCO (C1/F04). , The outline CoCP (APP -193) refers to an Surface and Groundwater Management Plan (APP – 202) and an Outline Pollution Prevention Plan (APP-197) which include information for managing surface water runoff and pollution prevention and mitigation measures during construction. These plans are secured through Requirement 8 of Schedule 2A and 2B of the draft DCO (C1/F04).</p> <p>Where practicable, cleaning of the wheels of vehicles leaving site to prevent the accumulation of soil and sediment on road surfaces will be provided.</p>
REP1-068 10.3.3	<p>In respect of the beach, BBC requires the Applicants to consider methodologies of construction to minimise the impact on bathing waters. Potential mitigation may include funding the Fylde Coast 'Turning Tides' group which oversees local response to bathing water quality to support a testing regime during the duration of the works. This is considered necessary as any reduction in bathing water quality would impact negatively upon visitor numbers and perception which may lead to fewer trips to the area and potential impacts upon the economy.</p>	<p>The Applicants refer BBC to REP1-068 10.2.7 above relating to bathing water quality</p>

Reference	Written Representation Comment	Applicants' response
REP1-068 10.3.4	Further information is required to assess how the proposed development would interact with existing land uses and consequential impacts. Details of how land would be restored in respect of ground levels and materials should be provided to ensure that the operational and post-decommissioning periods of the Scheme would not have a detrimental impact upon flooding.	The Applicants have provided a detailed response with regard to how the Transmission Assets would interact with existing land uses during construction, operation and maintenance and decommissioning previously and would refer the BBC to the response within RR-704.9.2 (PDA-006).
REP1-068 10.3.5	Protective provisions should be agreed regarding council owned drainage infrastructure.	The Applicants consider that all necessary protective provisions have been included in the draft DCO in Schedule 10 based on due diligence undertaken to identify utilities within the Order limits. The Applicants require further information from BBC on their drainage infrastructure as set out at REP1-068 10.2.5 above.
REP1-068 11.1.1	<i>Landscape Policies</i> <i>National Policy Statements</i> Paragraph 5.10.1 of EN-1 states that “the landscape and visual effects of energy projects will vary on a case by case basis according to the type of development, its location and the landscape setting of the proposed development. In this context, references to landscape should be taken as covering seascape and townscape where appropriate”.	The Applicants note BBC’s reference to paragraph 5.10.1 of NPS EN-1, and can confirm that a Landscape and Visual Impact Assessment (LVIA) has been undertaken and is presented in Volume 3, Chapter 10: Landscape and Visual Resources (APP-123). The LVIA considers the likely impacts and effects of the Transmission Assets on landscape and visual receptors, in accordance with the requirements of the EIA Regulations and relevant national policy. It is confirmed that no offshore above sea-level components are included within the scope of the application for development consent for the Transmission Assets.. Following the meeting held on 22 February, a Technical Note (EOR0823-04) was issued to Blackpool Council, Fylde Council, South Ribble Council and Natural England, and it was agreed to remove this element of assessment from the proposal. As such, seascape characterisation and receptors, and the assessment of associated effects, were scoped out of the LVIA
REP1-068 11.1.2	Landscape and visual effects of the Scheme’s construction, maintenance and any decommissioning are particularly relevant to this area of Blackpool given the location of the SSSI and the Airport.	The Applicants refer BBC to <i>Section 10.12.6 Visual Impacts – Landfall and Onshore Export Cable Corridor</i> of Volume 3, Chapter 10: Landscape and Visual Resources (APP-123), which presents the assessment of potential visual effects from public routes and spaces within 1 km if the onshore export cable, during the Project’s construction phase.

Reference	Written Representation Comment	Applicants' response
		<p>Section 10.12.6 assesses public areas and routes in the vicinity of Blackpool Airport and is representative of potential visual effects on it. Once operational, the onshore export cable will be located underground, with only the inspection covers (for the underground transition joint bays) remaining visible.</p> <p>Paragraph 10.12.6.9 of Volume 3, Chapter 10: Landscape and Visual Resources (APP-123) confirms that the Planning Inspectorate agreed decommissioning impacts could be scoped out of the ES, on the basis that the onshore export cables would remain <i>in situ</i>. This approach minimises environmental disturbance during decommissioning. The Planning Inspectorate agreed that should any recovery or removal of cables be required – for instance, for recycling – such works would be undertaken through the existing ducts and would involve only limited activity at the cable joint bays. Otherwise, the cables would be left in place, with the ends cut, sealed, and securely buried as a precautionary measure. No new open-cut trenching is proposed as part of decommissioning.</p> <p>The Applicants note to BBC that Sites of Special Scientific Interest (SSSIs) are not assessed within the Volume 3, Chapter 10: Landscape and Visual Resources (APP-123), as SSSI designations are concerned with features of scientific interest – such as rare flora, fauna, or significant geological or physiographical characteristics – which fall outside the scope of the LVIA. Accordingly, the Applicants refer BBC to Volume 3, Chapter 3: Onshore ecology and nature conservation (APP-075), which provides a comprehensive assessment of the potential impacts on SSSIs that may be affected by the Transmission Assets within the administrative area of Blackpool.</p>
REP1-068 11.1.3	<p><i>Blackpool Development Plan Policies</i></p> <p>Policy CS7 (Quality of Design) of the Core Strategy requires new development to be well designed and enhance the character and appearance of the local area. Development will not be permitted that causes unacceptable effects by reason of visual intrusion, overlooking, shading, noise and light pollution or any other adverse local impact on local character or amenity.</p>	<p>The Applicants note Policy CS7 (Quality Design) and refer BBC to <i>Section 10.9</i> of Volume 3, Chapter 10: Landscape and Visual Resources (APP-123), which set out the three types of mitigation measures adopted as part of the Project, referred to as 'Commitments'. <i>Table 10.16</i> identifies the embedded mitigation measures adopted by the Applicants and states how these measures will be secured through the DCO process. <i>Table 10.17</i> outlines further measures contained within the <i>Outline Landscape Management Plan</i> (AS-050), which will inform and guide the detailed design of the Project post-consent. The Applicants consider that adequate measures have been put in place in relation to pre and post consent design to support ensure there is sufficient control, and that 'good design' can be delivered.</p>

Reference	Written Representation Comment	Applicants' response
REP1-068 11.1.4	Policy CS10 (Sustainable Design and Renewable and Low Carbon Energy) of the Core Strategy seeks to mitigate the impacts of climate change, minimise carbon emissions and ensure buildings are energy efficient. Non-residential developments must follow the principle of the energy hierarchy.	The Applicants note the comment regarding non-residential developments following the principle of the energy hierarchy.
REP1-068 11.1.5	Policy DM17 (Design Principles) of the Local Plan Part 2 requires all development to be of a high quality and should enhance and respond to any positive character of the local area.	The Applicants refer BBC to the response provided at REP1-068 11.1.3, which is also applicable to Policy DM17 (Design Principles).
REP1-068 11.1.6	Policy DM19 (Strategic Views) of the Local Plan Part 2 states that development should protect and enhance views of the following buildings and features of strategic importance: Blackpool Tower and along the seafront and coastline. Development that has a detrimental impact on these strategic views will not be permitted.	<p>The Applicants refer BBC to <i>Table 10.7</i> of Volume 3, Chapter 10: Landscape and Visual Resources (APP-123), which summarises key consultation comments received in relation to landscape and visual receptors during the Project's development. As set out on pages 27 to 28, BBC raised concerns that: "...the development would be visible from the Blackpool Promenade, which includes a number of heritage assets, including the Grade I Listed Blackpool Tower Building."</p> <p>The Applicants advises that the Preliminary Environmental Information Report (PEIR) included offshore components that would have been potentially visible from the Blackpool seafront and Blackpool Tower. However, these offshore elements were subsequently removed from the Transmission Assets prior to submission of the DCO application. Accordingly, consideration of potential effects on strategic views towards Blackpool Tower and the seafront was scoped out of the final assessment submitted with the DCO application as detailed in REP1-068 11.1.1 above on the basis that there was no potential for impact in this regard.</p>
REP1-068 11.1.7	Policy DM30 (Archaeology) of the Local Plan Part 2 states that where there is knowledge of archaeological remains or reasonable grounds for the potential of archaeology, proposals will be expected to be accompanied by an assessment of the significance of any archaeology prior to the determination of an application for the site and	An assessment of the likely impacts on buried archaeological remains is presented within Section 5.11 of ES Volume 3, Chapter 5: Historic environment (APP-096).

Reference	Written Representation Comment	Applicants' response
	how it will be affected by the proposed development.	
REP1-068 11.2.1	BBC are concerned about the potential impacts on the local landscape arising from the construction and restoration works. The removal and importation of material could have impacts both visually on the landscape but also on the condition of the ground and its ability to drain appropriately.	<p>The Applicants note BBC's concerns and refer to Volume 3, Chapter 10: Landscape and visual resources (APP-123), which assesses the potential impacts to landscape character and visual receptors arising from the temporary works of the landfall and onshore export cable corridor in Section 10.12.2 and Section 10.12.6, respectively, during the construction phase. This assessment of effects is undertaken based on the maximum design scenario (worst case) described in the methodology.</p> <p>Furthermore, Section 10.9 of Volume 3, Chapter 10: Landscape and Visual Resources (APP-123), sets out the mitigation measures adopted as part of the Project, referred to as 'Commitments'. Table 10.16 identifies the embedded mitigation measures adopted by the Applicants and states how these measures will be secured through the DCO process. Table 10.17 outlines further measures contained within the Outline Landscape Management Plan (AS-050), which will inform and guide the detailed design of the Project post-consent. The Applicants consider that adequate measures have been put in place in relation to pre and post consent design to support ensure there is sufficient control, and that 'good design' can be delivered.</p> <p>Requirement 16 of the draft DCO (REP1-008) states that any land which is used temporarily for construction must be reinstated following completion of the relevant stage of the onshore works, in accordance with details approved by the relevant planning authority. This includes the ability of the ground to drain appropriately.</p> <p>Reuse of soils and imported materials will require demonstration that they are suitable for use (chemically and geotechnically). Soils on site will be managed in accordance with the guidance set out in CoT25 and Soil Management Plan(s) will be prepared to ensure they remain in a suitable condition. This is secured by Requirement 8 within Schedules 2A & 2B of the draft DCO (REP1-008).</p>

Reference	Written Representation Comment	Applicants' response
REP1-068 11.2.2	It is of importance to BBC that the Scheme does not detract from the landscape by way of unnecessary structures, with fencing and site compounds to be appropriately designed.	<p>The Applicants note BBC's concerns and refer to Volume 3, Chapter 10: Landscape and visual resources (APP-123), which assesses the potential impacts to landscape character and visual receptors arising from the temporary works of the landfall and onshore export cable corridor in Section 10.12.2 and Section 10.12.6, respectively, during the construction phase. This assessment of effects is undertaken based on the maximum design scenario (worst case) described in the methodology.</p> <p>Furthermore, the Applicants note that CoT20 (of the Commitments Register (F1.5.3/F03)) states that all temporary working areas for the onshore export cable corridor, 400 kV grid connection cable corridor, temporary compounds, and the onshore substation sites will be clearly marked and secured with appropriate fencing. This will be done in accordance with the Outline Construction Fencing Plan (APP-203), as part of the Outline CoCP and in accordance with Construction (Design and Management) Regulations 2015 requirements. This is secured through Requirement 8 of Schedules 2A and 2B of the draft DCO (REP1-008).</p> <p>Requirement 16 of the draft DCO (REP1-008) states that any land which is used temporarily for construction must be reinstated following completion of the relevant stage of the onshore works, in accordance with details approved by the relevant planning authority.</p>
REP1-068 11.2.3	Given the extensive history of the Airport, there is potential that the Scheme will impact upon underground archaeological remains of interest in appreciating the development of aviation uses in this location.	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 DCO (REP1-008).
REP1-068 11.3.1	<p><i>Mitigation / Adequacy of DCO against Impacts on Landscape</i></p> <p>Detailed plans of the proposals and existing and proposed sections of the land to be altered should be provided for consideration. BBC consider that it may be necessary to enter into a legal agreement to confirm these details.</p>	<p>The Applicants note that works within Blackpool Borough Council are entirely temporary construction works. As such, any landscape works associated with the onshore export cable corridor are described and secured within Section 1.3.3 of the Outline Landscape Management Plan (AS-050), secured in Requirement 6 of Schedules 2A and 2B of the draft DCO (C1/F04) and Section 1.7 of the Outline Ecology Management Plan (APP-212), secured by Requirement 12 of Schedules 2A and 2B of the draft DCO (REP1-008). Both management plans will be developed into detailed plans in accordance with the outline document in consultation with the relevant planning authority, as secured by the relevant Requirements..</p> <p>The location of the landfall is described within Section 3.14 of Volume 1, Chapter 3: Project description (AS-024). The route of the onshore export cable corridor is described within Section</p>

Reference	Written Representation Comment	Applicants' response
		<p>3.15 of Volume 1, Chapter 3: Project description (AS-024). Although the precise routing of the onshore export cables within the corridor is not known, a maximum design envelope for the onshore export cable corridor has been identified within which the final design will sit. This allows flexibility for elements that are likely to require more detailed design subsequent to securing consent. The plans of the proposals are illustrated in the Works Plans – Onshore and Intertidal Part 1 of 2 (AS-016) and Part 2 of 2 (AS-017). The landscape strategy described in Section 1.3.3 of the Outline Landscape Management Plan (AS-050) relates to the landscape works that will be undertaken once installation works are complete within these areas.</p> <p>Requirement 16 of the draft DCO (REP1-008) states that any land which is used temporarily for construction must be reinstated following completion of the relevant stage of the onshore works, in accordance with details approved by the relevant planning authority.</p> <p>As such, the Applicants assert that the commitments secured within the draft DCO are the appropriate mechanism for landscape mitigation and therefore no separate legal agreement is required.</p>
REP1-068 11.3.2	Details of construction fencing and structures should be provided to illustrate any potential impact upon the local landscape. Where areas are degraded due to the works they should be repaired to their existing condition post-works.	<p>The Applicants note that CoT20 (of the Commitments Register (F1.5.3/F03)) states that all temporary working areas for the onshore export cable corridor, 400 kV grid connection cable corridor, temporary compounds, and the onshore substation sites will be clearly marked and secured with appropriate fencing. This will be done in accordance with the Outline Construction Fencing Plan (APP-203), as part of the Outline CoCP and in accordance with Construction (Design and Management) Regulations 2015 requirements. This is secured through Requirement 8 of Schedules 2A and 2B of the draft DCO (REP1-008).</p> <p>Requirement 16 of the draft DCO (REP1-008) states that any land which is used temporarily for construction must be reinstated following completion of the relevant stage of the onshore works, in accordance with details approved by the relevant planning authority.</p>
REP1-068 11.3.3	BBC welcomes the requirement for an archaeological written scheme of investigation to be prepared and submitted for approval. If this identifies any important features, site surveys should be carried out to ascertain whether any remains are present and recorded where appropriate. Should any unexpected remains be	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 DCO (REP1-008).

Reference	Written Representation Comment	Applicants' response
	identified during the scope of works, these should be subject to an appropriate recording or protection if appropriate.	
REP1-068 12.1.1	<p><i>Construction Management Practices Policies</i></p> <p><i>Blackpool Development Plan Policies</i></p> <p>DM36 (Controlling Pollution and Contamination) of the Local Plan Part 2 states that development will be permitted where it can be demonstrated that the development:</p> <ul style="list-style-type: none"> a. will be compatible with adjacent existing uses and would not lead to unacceptable adverse effects on health, amenity, safety and the operation of surrounding uses and for occupants, users of the development itself or designated sites of importance for biodiversity, with reference to noise, vibration, odour, light, dust, other pollution or nuisance. Applications will be required to be accompanied, where appropriate, by relevant impact assessments and mitigation proposals. b. In the case of previously developed, other potentially contaminated or unstable land, a land remediation scheme can be secured which will ensure that the land is remediated to a standard which provides a safe environment for occupants and users and does not displace contamination; 	The Applicants note reference to policy DM36. Compliance of the application documents with this policy is set out in Table 1.1 of the Local Planning Policy Tracker (APP-236).

Reference	Written Representation Comment	Applicants' response
	<p>c. Will not give rise to a deterioration of air quality in the defined Air Quality Management Area in Blackpool Town Centre or result in the declaration of a new AQMA. Where appropriate an air quality impact assessment will be required to support development proposals;</p> <p>d. Where development will result in, or contribute to, a deterioration in air quality, permission will only be granted where any such harm caused is significantly and demonstrably outweighed by other planning considerations and appropriate mitigation measures are provided to minimise any such harm.</p> <p>e. Will not pose a risk of pollution to controlled waters (surface or ground water) and will, where required, include mitigation and/or remediation to prevent any unacceptable levels of water pollution.</p>	
REP1-068 12.2.1	<p><i>Impacts of construction practices</i></p> <p>Due to the extent and duration of the planned construction and decommissioning phases of work there is the potential for this to have significant effects upon the local population. This is as a result of the works plus the associated traffic movements. Understanding the duration and extent of the works is therefore fundamental to assessing the level of impacts. The cumulative nature of the works across Projects A and B and their potential impacts requires further consideration by the Applicants.</p>	<p>The Applicants refer BBC to REP1-068 4.1.5 above in relation to assessment of the construction maximum design scenarios.</p>

Reference	Written Representation Comment	Applicants' response
REP1-068 12.2.2	Dust The construction and decommissioning stages of the Scheme have the potential to cause significant levels of dust, which can impact upon the operations of local services as well as severely impact human health.	Dust is assessed in Volume 3, Chapter 9: Air quality (APP-121), which indicates that the impact of dust soiling on property arising from dust emissions generated by onsite construction and decommissioning activities would be negligible. The Applicants have made a commitment (CoT33 of Volume 1, Annex 5.3: Commitments Register of the ES (F1.5.3/F03)) to prepare a Dust Management Plan(s). This is secured by Requirement 8 within Schedules 2A & 2B of the draft DCO (REP1-008). Detailed Dust Management Plan(s) will be implemented by the Applicants as approved by the local authorities.
REP1-068 12.2.3	Noise The activities undertaken during the construction and decommissioning stages of the Scheme have the potential to result in significant noise levels. This would be exacerbated if work is carried out throughout the extended working hours set out within the Applicants submission. The working hours should be reduced to reflect the urban nature of the wider area. In line with codes of practice, machinery should be subject to noise abatement measures wherever possible.	Noise, specifically referring to working hours, is assessed in Volume 3, Chapter 8: Noise and vibration (APP-117). The Applicants have made a commitment (CoT79 of Volume 1, Annex 5.3: Commitments Register of the ES (F1.5.3/F03)) to prepare a Noise and Vibration Management Plan. This is secured by Requirement 8 within Schedules 2A & 2B of the draft DCO (REP1-008). Detailed Noise and Vibration Management Plan(s) will be implemented by the Applicants as approved by the relevant planning authority, as appropriate. The Applicants provided a justification of the working hours applied for within the Transmission Assets application within the Applicants response to Hearing Action Points (REP1-037) ISH1_30.
REP1-068 12.2.4	Scenario assessments should consider a range of scenarios as the impacts created through maximum noise levels over one period and lower noise levels over a greater period of time, may create different impacts which require different mitigation.	The Applicants refer BBC to REP1-068 4.1.5 above in relation to assessment of the construction maximum design scenarios, including in relation to noise.
REP1-068 12.2.5	Lighting Artificial lighting provision through the construction and decommissioning stages of the Scheme may detrimentally impact local residents, biodiversity and operations at Blackpool Airport. Given the sensitive nature of receptors, full consideration would need to be given to the position and type of	Lighting has been assessed within section 3.11.11 of Volume 3, Chapter 3: Onshore ecology and nature conservation (APP-075) which identifies potential effects on bats, but with mitigation the effects would be minor adverse (not significant). Mitigation is secured via Requirement 12 (Outline Ecological Management) of Schedules 2A and 2B of the draft DCO (REP1-008). Management of artificial light emissions during construction is secured through Requirement 8 of Schedules 2A and 2B of the draft DCO (C1/F04) which requires approval and implementation of codes of construction practice for each stage of works. This includes a construction artificial light

Reference	Written Representation Comment	Applicants' response
	lighting proposed. Instances where night-time working would be required should be fully evidenced and put forward to the local authority for agreement at the earliest opportunity.	emissions management plan which must accord with the outline construction artificial light emissions management plan (APP-204).
REP1-068 12.2.6	<i>Soil contamination</i> The movement of soil and groundworks have the potential to impact upon existing contamination or may result in contamination due to the type of works proposed. Measures should be in place to ensure no leaching of materials into the soil and that local waterways are appropriately protected. This is further complicated by the presence of a high water table in the local area and so the risk of this occurring needs to be clarified by the Applicant.	The Applicants have committed to implementation of detailed Code of Construction Practice(s) (CoCP) (commitment CoT35) through Requirement 8 of Schedules 2A and 2B of the draft DCO (C1/F04). The outline CoCP (APP -193) refers to an Outline Surface and Groundwater Management Plan (APP – 202) and an Outline Pollution Prevention Plan (APP-197) which include information for managing surface water runoff and pollution prevention and mitigation measures during construction. These plans are to be secured through Requirement 8 of Schedules 2A and 2B of the draft DCO ((REP1-008).
REP1-068 12.3.1	<i>Mitigation / Adequacy of DCO regarding impacts of construction practices</i> <i>General Mitigation</i> These matters will need to be consistently reviewed and managed throughout the construction and decommissioning phases, actively engaging with the relevant authorities, in determining appropriate mitigation where necessary. Flexibility should be included to allow mitigation to change based upon current conditions. Consideration should also be given to the cumulative impact of these matters across all stages of the Scheme.	General mitigation measures will be reviewed during the construction phase by actively engaging with the relevant authorities, in accordance with the Outline Code of Construction Practice (APP-193). The Applicants have committed to implementation of detailed Code of Construction Practice(s) via the following commitment, CoT35 (see Volume 1, Annex 5.3: Commitments Register (F1.5.3/F03)), which is secured by inclusion of Requirement 8 within Schedules 2A & 2B of the draft DCO (REP1-008). Detailed COCP(s) will be implemented by the Applicants as approved by the relevant planning authority, as appropriate.

Reference	Written Representation Comment	Applicants' response
REP1-068 12.3.2	Details will need to be provided of any night-time working for consideration against the closest sensitive receptors. Pre-agreement would be required from the Council for any night-time works. Provision should also be made for advising local residents of such working and make available contact details for dealing with concerns throughout the duration of the Scheme.	<p>Night working is not scheduled as part of the normal construction programme and will only be undertaken in exceptional circumstances. Where night working is unavoidable, light fixtures will be directed away from habitat of value or otherwise notable species. Any such installations will be inspected by the ECoW for compliance. The Applicants have committed to implementation of detailed Construction Artificial Light Emissions Management Plan(s) via CoT28, secured by inclusion of Requirement 8 of the draft DCO (REP1-008)</p> <p>The Applicants have also committed to implementation of detailed Communications Plan(s) via CoT35 (secured by Requirement 8 of the draft DCO (REP1-008)) which will advise local residents of night working. Community Liaison Officer(s) will be appointed to be the point of contact for local residents and will disseminate information to the community.</p>
REP1-068 12.3.3	<i>Lighting</i> Details of any lighting required during any necessary night-time works and the location of such should be provided to enable consideration of impact on sensitive receptors, this should be agreed with the relevant local authority and other agencies, including Blackpool Airport.	See response to REP1-068 12.3.2.
REP1-068 12.3.4	<i>Soil Contamination</i> Further detail should be provided on the requirements for soil removal and importation and the potential impacts of such. Consideration of dust and noise suppression and waste removal details should be set out within a Construction Management Plan.	The Applicants have made a commitment (CoT33 and CoT79 of Volume 1, Annex 5.3: Commitments Register of the ES (F1.5.3/F03)) to prepare Noise and Vibration Management Plan(s) and Dust Management Plan(s) to reduce potential impacts. These are secured by Requirement 8 within Schedules 2A & 2B of the draft DCO (REP1-008).
REP1-068 12.3.5	Full ground investigations should be completed for land within the works plan boundary, to include for soil testing prior to works commencing.	In accordance with CoT118 of Volume 1, Annex 5.3: Commitments Register of the ES (F1.5.3/F03), full ground investigations will be undertaken to mitigate potential impacts to, or effects to sensitive receptors. This is secured under Requirement 8 within Schedules 2A & 2B of the draft DCO.

Reference	Written Representation Comment	Applicants' response
REP1-068 13.1.1	<i>Matters of Clarification required</i> Beyond the mitigation and detail requested within the preceding chapters of this report, the following clarification is also requested.	This is addressed in points below.
REP1-068 13.1.2	Clarity is required on the extent and necessity of the proposed temporary and permanent possession rights which are sought and the red line boundary. BBC require sufficient clarity to fully assess the proposals which may affect land, residents and operators within their borough. This includes circumstances of temporary interference, which would impact upon rights of access, such as to Starr Gate and the permanent sterilisation of land.	The Applicants refer BBC to REP1-068 9.2.1 in relation to land rights sought.
REP1-068 13.1.3	Further information is required from the Applicants pertaining to their proposed maintenance rights across the DCO limits for the duration of the Scheme. This should be strictly limited to the land which is wholly necessary to support the Scheme.	The Applicants refer BBC to REP1-068 9.2.1 in relation to land rights sought.
REP1-068 13.1.4	Construction hours set out within Article 14, Schedule 2A and 2B, require greater clarity regarding works within the extent of Blackpool Airport. This is to support suitable management of continuous Airport operations alongside the Scheme.	The Applicants and Blackpool Airport have been in detailed discussions and negotiations regarding the works on Blackpool Airport's operational land for many months. The key principle that the Airport requires to underpin the design of the Projects works is that Blackpool Airport are able to ensure the continued safe, efficient and uninterrupted operation of the Airport. The construction hours and works to be used within Blackpool Airport is one of the matters currently under discussion with Blackpool Airport. The Applicants are confident that through those discussions the concerns raised can be addressed in full.

Reference	Written Representation Comment	Applicants' response
REP1-068 13.1.5	A detailed programme is required to provide certainty to BBC regarding the installation, connection, operational and decommissioning stages of the Scheme and their associated works and aim to reduce disruption in respect of the phasing of each element of the works.	<p>The Applicants' response to Hearing Action Points (REP1-037) ISH1_23 provides clarity that the ability to construct each project in stages is not the same as 'phasing' in the way that phasing of a scheme might apply in the context of a residential led mixed use development where outline planning permission is granted under the Town and Country Planning Act 1990 where one part or area could be built and the developer may or may not build out further phases. This also relates to the provision of a detailed programme.</p> <p>For consistency and as further recognition that all parts of Project A will be constructed in one overall phase and all parts of Project B will be constructed in one overall phase. More detail is provided within the response regarding staging of works under Requirement 3 of Schedule 2A and 2B of the draft DCO (REP1-008)</p>
REP1-068 14.1.1	<p><i>Development Consent Order</i></p> <p><i>Introduction to consideration to the dDCO</i></p> <p>In this LIR BBC request amendments to the dDCO which are summarised below and reserve the right to request further amendments following engagement with the Applicants and to submit a comprehensive statement prior to Deadline 3.</p>	The Applicants note this comment.
REP1-068 14.1.2	It is not clear in the Explanatory Memorandum to the DCO or the Statement of Reasons the extent of the rights requested and associated reasoning for this request. Consequential result in the dDCO is that Schedules 7 and 8 are widely worded with insufficient certainty as to the actual works which intend to occur and necessity for such works. The uncertainty follows through in particular to the temporary rights requested in the dDCO, Articles 29 to 30. It is submitted that the consequential effect of this uncertainty is contrary to the tests of necessity and proportionality.	The Applicants disagree and consider that Schedules 7A/7B and 8A/8B are clearly drafted and align with well precedented drafting in other DCOs which include compulsory acquisition and temporary possession powers. Each schedule clearly identifies the land plots to which the specified temporary possession powers and specified rights are applicable. In addition, as there are Project A and Project B schedules, it provides clarity with regards to which plots are to be used by each project. These Schedules must be read in conjunction with the Book of Reference (REP1-014), the Land Plan – onshore (REP1-004), the Works Plans – Onshore and Intertidal (AS-014 and AS-015) and each project's authorised the works descriptions in Schedule 1 of the draft DCO (REP1-008). The Applicants do not therefore consider there to be any uncertainty.

Reference	Written Representation Comment	Applicants' response
REP1-068 14.2.1	<i>Amendments to the dDCO</i> Article 8: Statutory Nuisance is considered to be too wide in light of the location of the construction vehicles through residential areas, along Squires Gate Lane and the location of the construction compound on land known as Blackpool Airport. It is considered that in light of this location the Applicant should be held accountable in the normal way and not absolved of responsibility.	BBC are referred to paragraph 1.6.3.21 to 1.6.3.26 of the Explanatory Memorandum (REP1-010) which clearly explain the purpose of Article 7 and the basis for its inclusion in the draft DCO including under Section 158 of the Planning Act 2008. In addition, the drafting of this Article is well precedented as set out in paragraph 1.6.3.26 of the Explanatory Memorandum (REP1-010).
REP1-068 14.2.2	The seven year implementation period set out within the dDCO (Article 1, Schedule 2A and 2B) is excessive and creates uncertainty for BBC. This includes uncertainty and potential delays to future local authority led developments at and around Blackpool Airport. BBC suggest that this time period be reduced to five years, particularly as Projects A and B are likely to be implemented separately resulting in a long period of disruption to residents and businesses.	The Applicants consider the 7 year implementation period to be appropriate given the unique nature of the Transmission Assets. The Applicants have provided a clear explanation of and rationale for the 7 year implementation period at paragraphs 1.6.6.8 to 1.6.11 and 1.7.2.5 to 1.7.2.6 of the Explanatory Memorandum (REP1-010). The Applicants note inclusion of a 7 year implementation period is well precedented for offshore wind farm DCOs and was included most recently in The Rampion 2 Offshore Wind Farm Order 2025.
REP1-068 14.2.3	BBC have reviewed the approval of matters specified in the requirements in Schedule 12 of the dDCO and request that the timeframes are stopped for consultation to occur for a period of up to 21 days. The period of 21 days aligns with the consideration of planning applications in the Blackpool area.	Given the limited overlap of the Application with BBC's administrative area it would be disproportionate to amend the draft DCOs as suggested. However, the Applicants note that Schedule 12 Paragraph 3 provides for an eight week determination period which can be extended by agreement. Further the Applicants are willing to enter into a Planning Performance Agreement with BBC to support their functions under Schedule 12.
REP1-068 14.2.4	The effect of 'Article 47 – inconsistent planning permissions' is considered to be inconsistent with the statutory powers of a Local Planning Authority. The Article seeks to curtail the effect of planning conditions placed on a planning permission on the	The Applicants note that Article 47 has been updated in the draft DCO submitted at Deadline 2 (C1/F04) to reflect the drafting most recently approved by the Secretary of State in the A122 (Lower Thames Crossing) Development Consent Order 2025. The Applicants consider that this updated wording is appropriate and proportionate, and its purpose is to allow planning permissions and the Order to coexist.

Reference	Written Representation Comment	Applicants' response
	land within the redline boundary by the Local Planning Authority which is inconsistent with the Scheme. Additionally, the power sought within this article is considered to be too wide given the amount of land located within the redline area which may be developed within the future.	
REP1-068 14.2.5	The dDCO does not require decommissioning of the transmission assets and associated infrastructure and restoration of the land once the wind farms are no longer operating. Additionally, Requirement 16 refers to the restoration of land used temporarily (we assume the temporary possession rights) which may continue for a substantial and unquantified period of time. The likely impact is that the absence of any such requirements may impose expenditure by the local authorities which they are unable to afford. Particularly in respect of land in the ownership of BBC. Land on which construction compounds are to be temporarily required must be restored and roads fully sealed. The dDCO lacks any of these assurances and currently places this burden on the public purse.	<p>Section 105 of the Energy Act 2004 (the 2004 Act) allows the Secretary of State to serve a notice requiring Morgan OWL or Morecambe OWL to submit a decommissioning programme for approval.</p> <p>Requirement 22 (Onshore decommissioning) of the draft DCO (REP 1-008) requires the Applicants to submit for approval to the relevant planning authority an onshore decommissioning plan for the onshore works within 6 months of the cessation of commercial operations. The onshore decommissioning plan must be implemented as approved.</p> <p>This follows a well precedented and accepted drafting approach to decommissioning and places the obligation on the undertakers. The draft DCO does not therefore place any burdens on the public purse in this regard.</p>
REP1-068 14.2.6	In relation to sensitive sites, BBC considers that this could lead to permanent local impacts and give rise to specific policy conflicts and concerns.	The Applicants would welcome discussion with BBC to understand what impacts, policy conflicts and concerns they are alluding to.

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REP1-068 14.2.7	<p><i>Traffic, Transport and Construction</i></p> <p>It should be highlighted that corrections are required to Schedule 3A, 3B, 4A and 4B within the dDCO. The first two entries of each are considered by BBC to be incorrect. The red edge identified on the Works Plan – Sheet 3 of 21, clearly illustrates that the signal junction and north side of Starr Gate and the beach access straddle Blackpool Borough Council and Fylde Borough Council boundaries. The area of the signalised junction is subject to a cross-boundary agreement and administered by Blackpool Borough Council. These schedules should be reviewed and updated where necessary.</p>	Please refer to the response at REP1-068 5.5.7 above.
REP1-068 14.2.8	BBC request that the rights set out within the dDCO in so far as they relate to Part 3 Streets being Articles 9 to 15 of the dDCO are reviewed to provide absolute certainty that the Local Highways Authority maintain the discretion required to discharge its statutory function. Discussions are requested with the Applicant to provide the required certainty.	Following discussions with BCC, the outline CTMP has been updated to clarifying the use of Starr Gate accessway. In addition, Starr Gate has been removed from draft DCO schedule 3A, 3B, 4A and 4B thereby disapplying the provisions of Article 9, Article 11 and Article 13 (4), (5) and (6)(a).
REP1-068 14.2.9	Additionally, of concern is the effect of the provisions in Part 3 and the rights sought to be acquired on the Starr Gate accessway. It is requested that the possessory rights sought are removed and alternative, appropriate traffic management measures be put in place in collaboration with the Local Highways Authority pursuant to Article 15 of the dDCO. It is considered that the current rights sought are not necessary or proportionate, particularly in	

Reference	Written Representation Comment	Applicants' response
	consideration of the adverse impact to the local and wider communities.	
REP1-068 14.2.10	Construction hours set out within Article 14, Schedule 2A and 2B, require limitations regarding works within the extent of Blackpool Airport and if retained, Starr Gate accessway. This is to support suitable management of continuous Airport operations alongside the Scheme and ensure retention of the accessway for all users, particularly emergency services.	As confirmed at Issue Specific Hearing 1 (REP1-034), the Applicants are in discussions with Blackpool Airport Operations Limited (BAOL) in relation to works within the Airport and will enter into a commercial agreement with BAOL to ensure coexistence of airport operations alongside the Transmission Assets. The Applicants do not consider any amendments are required to Requirement 14 and further refer BBC to the Applicants response to ISH1_30 within the Applicants Response to Hearing Action Points due at Deadline 1 (REP1-037).
REP1-068 14.2.11	<i>Employment and Skills</i> dDCO requirement 19 should be amended to include consultation with BBC alongside other authorities and provide greater certainty of delivery with specified timeframes and outcomes to be met. Any final Employment and Skills document should be subject to the Council's agreement rather than notification to ensure all relevant considerations have been addressed. BBC would also suggest that the requirements of the Plan be covered by a S106 agreement to ensure that they remain enforceable throughout the lifetime of the Scheme. Amendment is sought to the current drafting in the dDCO of requirement 19 to ensure greater certainty of delivery of apprenticeships and the use of local labour and businesses during the construction and operational periods.	The Applicants will consider any specific drafting proposals BBC wishes to propose for Requirement 19. The Employment and Skills Plan developed pursuant to Requirement 19 will be subject to the monitoring and enforcement provisions of the draft DCO (REP1-008). The Applicants do not consider that a s106 Agreement is required to secure delivery of the measures set out in the Employment and Skills Plan in addition to a Requirement. The Applicants will engage further with BBC on the outline Employment and Skills Plan.

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REP1-068 14.2.12	<i>Flooding and drainage</i> Protective provisions are requested to specifically protect all BBC owned drainage infrastructure located within the redline boundary and construction routes.	The Applicants refer BBC to REP1-068 10.3.5 above in relation to council owned drainage infrastructure.
REP1-068 14.2.13	<i>Aquacomms Infrastructure</i> Protective provisions are requested to specifically protect and provide an indemnity in relation to all the aquacomms infrastructure located within the redline boundary and construction routes. Of most concern is that located along the Starr Gate accessway as this infrastructure is important to the Blackpool Airport Enterprise Zone.	The draft DCO (REP1-008) contains protections for operators of electronic communications code networks at Part 2 of Schedule 10.
REP1-068 14.2.14	<i>Blackpool Airport</i> Protective provisions are requested to specifically protect all operations undertaken by Blackpool Airport, which includes defence and HM Coastguard. Whilst the defence do not have a permanent or temporary base at Blackpool Airport, the Airport is regularly used operationally as a destination for early pilot training flight exercises, approach exercises for larger Transport Aircraft as well as regular refuelling stops and passenger drop-off. The SAS have also based helicopters at the airport on several occasions when conducting training exercises. HM Coastguard regularly use Blackpool Airport for refuelling when on Irish Sea search and rescue missions, and the Police Aviation service helicopters use the airport for refuelling and have dispensation for out of hours operations.	The Applicants are in direct discussions with Blackpool Airport Operations Ltd in relation to airport impacts, and as confirmed at Issue Specific Hearing 1 (REP1-034), the Applicants are in discussions with Blackpool Airport Operations Limited (BAOL) in relation to works within the airport and will enter into a commercial agreement with BAOL to address their concerns to ensure coexistence of airport operations alongside the Transmission Assets.

Reference	Written Representation Comment	Applicants' response
REP1-068 14.3.1	<i>Securing Mitigation through a S106 Agreement</i> This LIR has highlighted where mitigation is requested by BBC from the Applicants, and BBC reserve the right to request amendments to the dDCO if mitigations in the form of a S106 agreement are not forthcoming from the Applicants.	Noted. The Applicants position is that the Articles and Requirements in the draft DCO along with associated plans is the appropriate mechanism to secure the mitigation measures required for the Transmission Assets identified through the Environmental Impact Assessment save for in exceptional circumstances where the nature of certain mitigations (such as financial contributions) cannot be secured via requirements within the draft DCO such as the s106 proposed to support the users of the Blackpool Road Recreation Ground.
REP1-068 14.3.2	It is the expectation of BBC that this would be secured through the Applicants entering into a S106 Agreement in respect of the following requirements. A S106 agreement is available to the Applicants and Councils through S104A of the Town and Country Planning Act 1990.	The Applicants refer BBC to REP1-068 14.3.1 above.
REP1-068 14.3.3	BBC would be involved with the discharge of requirements to ensure details submitted for approval are acceptable. To assist the Authority in providing the resourcing necessary to discharge these details and undertake monitoring responsibilities, BBC requests that the Applicants agree to financial compensation to pay for the discharge of these requirements either through funding of a consultant or an officer for the extent of the duration required.	The Applicants have offered BBC a Planning Performance Agreement (PPA) to enable cost recovery.
REP1-068 14.3.4	The requirements of the Employment and Skills Statement should be monitored for the duration of the works. The cost associated with monitoring the outcomes would be secured through the S106 agreement. This would include timeframes and a firm commitment to the provision of the measures referred to in the plan.	See response to REP1-068 14.3.3 above.

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REP1-068 14.3.5	<p>Community benefits are to be discussed further with the Applicants. This approach has also been made to Fylde Borough Council. The community benefits sought by BBC include:</p> <ul style="list-style-type: none"> • a Skills and Employment Plan, to include timeframes and firm commitment to the provision of the measures referred to within the plan, social benefits, apprenticeships and connections for businesses, including use of the Blackpool & the Fylde College Lancashire Energy HQ to support the skills agenda • a financial contribution towards the 'Turning Tides' initiative • A local benefit fund to mitigate loss of access to vulnerable persons facilities which will occur within the sand dunes and open space areas and may occur due to the loss of access to St Annes beach • Temporary closure of access to the Squires Gate Lane / Clifton Road North roundabout would compromise access to private homes and potentially businesses, which would be particularly harmful during the summer and festival periods. Therefore, compensation is sought for those affected • Opportunities for the provision of lower cost power to the area, to compensate for general disruption, should be explored. This may comprise robust community reparations through an appropriate 	<p>The Applicants refer BBC to REP1-068 9.7.1 above with regard to the Outline Employment and Skills Plan.</p> <p>The Applicants refer BBC to REP1-068 10.2.7 above with regard to the 'Turning Tides' initiative.</p> <p>The Applicants refer BBC to REP1-068 6.5.2 above with regard to community benefits.</p> <p>The Applicants refer BBC to REP1-068 9.3.3 above with regard to provision of lower cost power to the area.</p> <p>The Applicants refer BBC to REP1 5.2.3 above with regard to commitments in relation to no road closures.</p>

Reference	Written Representation Comment	Applicants' response
	scheme or a financial contribution to a community fund. BBC seek a favourable power purchase agreement which would support the Silicon Sands developments centred on the Airport Enterprise Zone but extending along the entirety of the Fylde coast, that will provide employment diversification	
REP1-068 14.3.6	The impact of construction / decommissioning traffic on the road network would need to be remediated through appropriate maintenance and repair. In line with the requested dilapidation surveys, monitoring of the impacts of the Scheme would be required, the associated cost should be secured through the S106 agreement. Any closure of the Starr Gate slipway access would require relocation and provision of facilities and even a temporary closure of Squires Gate Lane may compromise access to private homes or businesses, particularly during the summer and festival periods, therefore compensation is sought for those affected.	The Applicants refer BBC to REP1-068 14.3.1 above.
REP1-068 15.1.1	<i>Conclusion</i> The NPS is clear that in considering the 'economic and efficient' approach a network project, such as this Scheme, must follow good design, avoidance and mitigation principles as referenced in EN-5. It is considered that the design of the Scheme lacks sufficient certainty and clarity to be assessed and determined against the NPS.	The Applicants note BBC's comments and expect that clarifications within this response to the BBC Written Representation will aid BBC's understanding to have sufficient certainty and clarity. The Applicants assert that the application is sufficiently robust and is wholly compliant with NPS.

Reference	Written Representation Comment	Applicants' response
REP1-068 15.1.2	Additionally, in respect of the land rights sought, the tests of necessity, proportionality and certainty are not met. The rights as currently drafted are too wide and unable to be clearly determined for any relevant assessment to occur.	The Applicants refer BBC to REP1-068 9.2.1 above in relation to land rights sought.
REP1-068 15.1.3	Due to the lack of detail and following the precautionary principle, adverse effects on the continued and uninterrupted operation and therefore integrity of Blackpool Airport as a result of the energy infrastructure development cannot be ruled out.	The Applicants refer BBC to REP1-068 4.1.7 above in relation to Blackpool Airport.
REP1-068 15.1.4	BBC consider that further engagement may assist to overcome these impediments and look forward to greater clarity and therefore certainty being provided together with a proper package of mitigations. BBC remain supportive of green energy infrastructure located within its area.	The Applicants look forward to engaging proactively with BBC and note that BBC remain supportive of green energy infrastructure located within its area.

3 **References**

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