

MORGAN AND MORECAMBE OFFSHORE WIND FARMS: TRANSMISSION ASSETS

Annex 3.4 to Applicants' Response to WRs: Newton with Clifton and Freckleton Parish Councils



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Glossary

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

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

1 Applicants' response to Written Representations

1.1 Introduction

- 1.1.1.1 Following Deadline 1, Morgan Offshore Wind Limited and Morecambe Offshore Windfarm Limited (hereafter, 'the Applicants') have reviewed each of the Written Representations (WRs) and post hearing submissions received from stakeholders who registered as Interested Parties in the Examination.
- 1.1.1.2 Details of the Applicants' response to the WR of Newton with Clifton and Freckleton Parish Councils are set out in the subsequent sections of this annex.

2 Responses to Written Representations

2.1 Newton with Clifton and Freckleton Parish Councils

Table 2.1: REP1-183 – Newton with Clifton and Freckleton Parish Councils

Reference	Written Representation Comment	Applicants' response
REP1-183 1.1	<p>Summary:</p> <p>We consider that a much shorter, cheaper, less damaging alternative can connect to Penwortham via Stanah, using an existing National Grid line, already 400KV capable, with cost savings estimated at £903m at current prices. The alternative would use a designated brownfield site, and create jobs in one of the most deprived areas of Lancashire in future energy intensive, green hydrogen production, yet applicants dismiss its feasibility, opting for complex solutions. The applicants avoid responsibility for landfall decisions, deferring to National Grid and hence they have opted for a conflicted, all new, cross-Greenbelt route.</p> <p>Concerns arise over site selection, extended construction periods, and lack of benefits to local communities. Consultation efforts are insufficient, leading to stakeholder frustration. Agricultural impacts include prolonged and permanent land loss and disruption. Beach access at St Anne's faces likely closures without mitigation plans. Air safety concerns remain unresolved due to poor engagement with BAE Systems. Emergency access restrictions for blue light vehicles during the construction period would create a danger to residents.</p> <p>Community benefits remain undefined despite available government guidance. Existing and proposed energy projects</p>	<p>The Applicants note the comments of Newton with Clifton and Freckleton Parish Councils and have answered these within the relevant sections below.</p>

Reference	Written Representation Comment	Applicants' response
	<p>threaten to overwhelm greenbelt areas. The cumulative impacts of substations, cabling, and solar farms lack adequate assessment. Biodiversity concerns persist, with protected bird species inhabiting affected areas. Temporary land use remains unaccounted for in biodiversity net gain (BNG) calculations. All of these issues are worsened by the refusal of the applicants to consider any alignment of their works leading to a potential 10 year period of disruption.</p> <p>Ultimately, the alternative route offers a more direct, cost-efficient, and environmentally viable solution that has been ignored by applicants.</p>	
REP1-183 1.2	<p>Issues with the application route</p> <p>The application route between landfall at Blackpool Airport and Penwortham substation has serious flaws and insurmountable impacts and should not be consented, even without considering alternatives, but as demonstrated below there is in addition a much more convenient alternative.</p>	<p>The Applicants note the comments of Newton with Clifton and Freckleton Parish Councils and refer them to sections 2,3,4 ,5 and 6 of the Applicants' response to Hearing Action Points: ISH1 6, 8, 9, 19, 26 & 28 - Rev F01 (REP1-039).</p> <p>In relation to the suggestion of an alternative route at Stanah, the Applicants refer to Sections 3 and 4 (and the summary at 1.3) of REP1-039, and also to the Applicants' response to the Written Representation by the Lancashire Association of Local Councils Fylde Area Energy Working Group (S_D2_3.1). The Applicants' position, supported by NPS policy, is that it is not necessary nor appropriate to consider or assess hypothetical projects with alternative Points of Interconnection during the Transmission Assets Examination.</p> <p>The Pol is the "terminating point" (in the language of paragraph 2.2.1 of NPS EN-5) where the projects connect to the National Electricity Transmission System owned by NGET. The Pol for the projects is at the NGET Penwortham substation. The Pol was not selected by the Applicants. It was determined by a separate process which is subject to legal duties and process, and for which NESO (the</p>

Reference	Written Representation Comment	Applicants' response
		<p>UK's Electricity System Operator Licensee) is responsible, with input from NGET and the Applicants. The Pol was informed by the Holistic Network Design (HND) process led by NESO. A route to Stanah would involve a change to the Pol, which is not a decision within the direct control, statutory function, or expertise of the Applicants (Section 3 of REP1-039).</p> <p>The Applicants reiterate that they were engaged in the HND process and carefully considered the Pol proposed before accepting the connection offer, based on a clear and considered view that it represents a suitable and appropriate connection for the Generation Assets (Section 4.2 of REP1-039) which is supported by the NPS and is capable of being delivered sensitively within the host community and environment.</p>
REP1-183 1.3	<p><u>Unnecessary risk to life and/or ecological shortcomings</u></p> <p>As was heard at the hearing (or at least not disputed when questioned by the Examining Authority), the Applicants have failed to assess the proposed environmental enhancement area at Lea Marsh Fields for increased risk of bird strike at Blackpool Airport and Warton Aerodrome and the project may therefore either add an unacceptable risk to human life or if it reduces the enhancement area, not provide adequate ecological mitigation. The proposal only assesses lost habitat at the proposed permanent infrastructure and not along the cable route, when (page 34 of) biodiversity rules require the inclusion of habitat that will not be fully restored to its original type and condition within two years of being impacted, so biodiversity losses are being significantly under-reported and therefore 10% gain is not being provided.</p>	<p>The Applicants acknowledge that other Interested Parties have raised the potential bird strike risk associated with the Transmission Assets' areas of disturbance due to construction activities, ecological mitigation and biodiversity benefit areas, although the Applicants do not consider that the Project will increase or alter the risk posed by bird strike to aircraft operating out of Blackpool Airport or that the Project will create an increased risk to public safety .</p> <p>The Applicants are committed to working with Blackpool Airport and other stakeholders to ensure that stakeholders are confident in the Applicants' assessment conclusions and that Blackpool Airport's existing safeguarding systems and wildlife management plan (required under CAP 772) can continue to be complied with. The Applicants are engaging with Blackpool Airport and BAE Systems ("BAE") on a strategy for preparing a wildlife hazard management plan for the Transmission Assets. This document will be used to support ongoing discussions between the Applicants, Blackpool Airport and BAE with regards to the safeguarding of Blackpool Airport and Warton Aerodrome. A Strategy for Wildlife Hazard Management Plan (S_D2_14) has been submitted at Deadline 2.</p> <p>The completion of a Biodiversity Net Gain (BNG) assessment (including the use of the DEFRA metric calculator) is not yet mandatory for Nationally Significant Infrastructure Projects (NSIPs). As set out in the Biodiversity Benefit Statement</p>

Reference	Written Representation Comment	Applicants' response
		(APP-216), the BNG assessment undertaken by the Applicant was voluntary, as is the provision of the biodiversity benefit areas. Proportionate biodiversity enhancements are proposed by the Applicants given that most of the project impacts are temporary and reversible.
REP1-183 1.4	<u>Over 10x unnecessary length</u> The cable route is 30km long, as shown in tables 3.18 (landfall to substation) and 3.28 (substation to Penwortham) in the Project Description ([AS-024]). This compares with 2km from the coast to the edge of the Hillhouse Enterprise Zone, appropriately zoned for energy infrastructure and the owner of which wants the project sited there (see [RR-1656]).	The Applicants refer Newton with Clifton and Freckleton Parish Councils to the response to REP1-183 1.2, and to paragraph 3.5.1.7 of REP1-039 and would note that the comparison only refers to the 2km from coast to Hillhouse Enterprise Zone and fails to account for any distance from Stanah to the National Grid substation at Penwortham which is NGET's identified Pol for the Projects.
REP1-183 1.5	<u>Over 2x unnecessary environmental impacts</u> Furthermore the Applicants wish to be able to choose whether to build the two cables at the same time or sequentially, with no limit on how long each construction will take and up to a four year interval between finishing one and starting the other (derived from the separate seven-year commencement obligations in paragraph 1 of Schedules 2A and 2B respectively of the dDCO ([AS-004])). This unacceptably doubles the environmental impacts of construction; instead, by means of a requirement the earlier Applicant should be required to wait until the second project is either ready for construction to allow simultaneous construction or is declared not to be going ahead before it can commence.	<p>The Applicants have undertaken a full and robust assessment of the environmental impacts of the Project. This includes consideration of concurrent and sequential construction, including consideration of a gap of up to 4 years. This is set out within the Environmental Statement, with further detail provided within Section 2 of the Applicants' Response to the Rule 9 letter (AS-067) and Rule 9 – ES assessment of Construction Scenarios (AS-070)</p> <p>The Applicants do not consider it is necessary or appropriate for one project to wait until the second project is either ready for construction or not going ahead. The Applicants have set out the reasons for this within section 8 of of the Applicants response to Hearing Action Points: ISH1 6, 8, 9, 19, 26 & 28 - Rev F01 (REP1-039).</p>
REP1-183 1.6	<u>Many more adverse impacts</u> The chosen route has many other adverse impacts, outlined in more detail below. These include: <ul style="list-style-type: none"> the permanent, and given the alternative, unnecessary, loss of 22.1 hectares of Best and Most Versatile 	<p>In respect of the specific matters listed, the Applicants maintain that these are all adequately assessed and considered in other submissions, as follows:</p> <p>Agricultural Land</p>

Reference	Written Representation Comment	Applicants' response
	<p>agricultural land (see paragraph 6.11.2.10 of ES Chapter 6 [APP-104]);</p> <ul style="list-style-type: none"> the use of unsuitable rural roads for construction traffic, with increases of heavy vehicles of up to 1740% (table 7.22 of ES Chapter 7 [APP-108]) and the effects of closing major routes such as Clifton Road North and Queensway (dDCO Schedules 4A and 4B); impacts on heritage assets such as the Quaker burial ground (see paragraph 5.11.2.10 of ES Chapter 5 [APP-096]); substantial levels of compulsory acquisition (the Book of Reference [AS-011] is 1925 pages long); increased flooding risk caused by the works (see paragraph 1.10.2.4 of [AS-044]); the cumulative visual and other impacts of this project and others in the area resulting in increased industrialisation of a rural area, with a lack of photomontages from properties in the area being provided (table 3.24 in [APP-144] suggests only recreational impacts have been assessed); issues with the dDCO such as no obligation to construct the works where shown on the Works Plans, not clear that commitments in the Code of Construction Practice (CoCP) must actually be implemented. 	<p>The detailed site selection process undertaken by the Applicants is set out within Volume 1, Chapter 4: Site Selection and Consideration of Alternatives (AS-026) and its supporting annexes, including the consideration of the best and most versatile agricultural land at the potential substation locations. The permanent loss of the Subgrade 3a land comprises the lowest quality within the definition of best and most versatile and its loss is assessed in ES Volume 3, Chapter 6 (APP-104) at paragraph 6.11.2.13 to be of major adverse significance, which is significant in EIA terms.</p> <p>Traffic Matters</p> <p>Please refer to the Applicants' responses to REP1-183 1.23, 1.24 and 1.25 below.</p> <p>Heritage Assets</p> <p>Please refer to the Applicants response to REP1-183 1.19 below. In respect of the Quaker burial ground please refer to the response provided in Procedural Deadline A Submission – Annex 3.2.18 to Response to RR – Newton with Clifton Parish Council (RR-1616) (PDA-025), and also Annex 5.9 to the Applicants response to Hearing Action Points: ISH1 50 Rev F.01 (REP1-045).</p> <p>Compulsory Acquisition</p> <p>The compulsory acquisition powers sought over the Order Limits have been tailored such that the land and rights in land which are sought, are proportionate and necessary in order to deliver the Transmission Assets. Full detail on the compulsory acquisition powers and justification is set out within the Statement of Reasons (REP1-012)</p> <p>Flood Risk</p> <p>Please refer to the Applicants' responses to REP1-183 1.18 below.</p>

Reference	Written Representation Comment	Applicants' response
		<p>L VIA</p> <p>Volume 3, Chapter 10: Landscape and visual resources (APP-123) includes an assessment of potential cumulative effects at Section 10.14, Cumulative Effects Assessment. Scenario 4a, which is of particular relevance to this Written Representation, assesses the cumulative effects of the Transmission Assets in combination with projects, plans and activities that are: under construction; subject to a permitted application; subject to a submitted application; or operational but were not yet operational at the time baseline data were collected, and/or those operational developments that continue to give rise to ongoing effects. The Applicants therefore refer Newton with Clifton and Freckleton Parish Councils to this section.</p> <p>Regarding Newton with Clifton and Freckleton Parish Councils' comment concerning "...a lack of photomontages from properties...", the Applicants refer to the assessment of visual effects on local residents provided in Volume 3, Chapter 10: Landscape and Visual Resources (APP-123), specifically:</p> <ul style="list-style-type: none"> • Section 10.12.5: Visual Impacts – Substations, with reference to 'Impacts experienced by occupiers of residential properties within settlements', see paragraphs 10.12.5.154 to 10.12.5.172; and 'Impacts on local residents within individual properties', see paragraphs 10.12.5.173 to 10.12.5.183. • Section 10.12.6: Visual Impacts – Landfall and Onshore Export Cable Corridor, with reference to 'Impacts on local residents', see paragraphs 10.12.6.35 to 10.12.6.40. • Section 10.12.5: Visual Impacts – Substations, with reference to 'Impacts experienced by occupiers of residential properties within settlements', see paragraphs 10.12.5.154 to 10.12.5.172; and 'Impacts on local residents within individual properties', see paragraphs 10.12.5.173 to 10.12.5.183. • Section 10.12.6: Visual Impacts – Landfall and Onshore Export Cable Corridor, with reference to 'Impacts on local residents', see paragraphs 10.12.6.35 to 10.12.6.40. <p>As set out in Section 10.7.4 of the same chapter, the Applicants have concluded that no occupiers of residential properties within the study area are likely to experience a degree of harm over and above substantial to make considering</p>

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		<p>private views a public interest matter. It is not normal practice to produce photomontage from individual properties; rather, as set out in GLVIA3, it is standard practice to produce visualisations which are representative of the view in question and the character of the location. On this basis, the Applicants consider it reasonable and proportionate to use the selected representative viewpoints from publicly accessible locations. These representative viewpoints have been selected to reflect the range of likely visual experiences within the LVIA's study areas, and are supported by site survey observations undertaken from public locations points in proximity to potentially affected properties. Accordingly, the Applicants consider that the provision of photomontage visualisations from individual private properties is not necessary to support a robust and proportionate assessment of potential effects on local residents.</p> <p>DCO</p> <p>In relation to securing the Works Plans, the Applicants have amended Schedule 1, Part 1 of the draft DCO (C1/F04) to make it clear that the works authorised by the DCO are to be carried out in the areas shown on the Works Plans.</p> <p>With regard to the Code of Construction Practice (CoCP), the Applicants submitted the outline CoCP with the DCO Application (APP-193). Provision of a detailed CoCP is secured by Requirement 8 of the draft DCO, in that no works can commence until a CoCP for the relevant works has been submitted to and approved in writing by the relevant planning authority in consultation with Lancashire County Council, Natural England, the Environment Agency and the MMO (as relevant). Requirement 8 of the draft DCO (C1/F04) provides that any detailed CoCP "<i>must accord with the outline code of construction practice</i>". Requirement 8 also provides that any detailed CoCP as approved must be followed when carrying out the works to which it relates.</p>
REP1-183 1.7	<p>Alternative Route</p> <p>We welcome the Planning Inspectorate's approach to reporting on alternatives and referencing the Stonehenge and Langley Park School judgements. Both set precedents around</p>	<p>The Applicants refer Newton with Clifton and Freckleton Parish Councils to the response to REP1-183 1.2 above.</p>

Reference	Written Representation Comment	Applicants' response
	<p>considering alternatives, and the concept of alternatives being 'obviously material' (Stonehenge judgment paragraph 277) where there are clear objections to a proposal (Langley Park judgment paragraph 45) (links included since the Examining Authority raised them).</p> <p>This project has an alternative that is even more 'obviously material' than the above cases that has not been considered; in contrast to the Stonehenge alternative that was considerably more expensive and the decision was quashed because of it nevertheless, this alternative is much cheaper and more advantageous in nearly every way.</p> <p>The only reason given for the chosen route is the existence of a connection agreement to Penwortham substation. The Applicants did not say whether it applied for a connection to Penwortham or it was National Grid that decided the connection should be to Penwortham, if the latter it may be because it would cost National Grid less if the connection were at Penwortham even if the overall cost to the public purse would be much greater. The Parish Council requests that Ofgem is brought into the examination by means of questions so that it can be satisfied that the costs of the project are economic and efficiently deployed.</p> <p>If Penwortham is a must-have, which the Parish Council argue it is not, then a much less impactful and much cheaper route could still be provided via the Stanah substation further north and along the existing but not fully used pylons between Stanah and Penwortham.</p>	

Reference	Written Representation Comment	Applicants' response
REP1-183 1.8	<p>Details of the alternative route</p> <p>There is an established connection of an Irish Sea Wind Farm to Penwortham. This routes via the National Grid line that runs northwest to Hambleton and then on to Middleton/Heysham. At Hambleton, there is a tee junction to Stanah substation to which Walney 2 is connected and which supplies Blackpool North and the Isle of Man.</p> <p>This existing line has 400KV capability already but to accommodate more offshore wind power, additional cables would be beneficial on the existing pylon system. Using indicative costing data from the latest IET 2025 report on Transmission Technologies would suggest a saving of £900m could be achieved from using the established Northern Route infrastructure via Stanah-HTEZ rather than the Applicants' conflicted, all new cross-Greenbelt route. It would be irrational to spend such a large amount of money unnecessarily</p> <p>The line is capable of taking the power levels of the M&M windfarms at normal operating levels, which is at about 40% of maximum capacity. Looking to the future, the excess could be used to generate green hydrogen, which is the proposed use by the current site owner of Hillhouse TEZ land. We would be happy to offer a more detailed assessment to the Examining Authority.</p> <p>We note the various attempts by the Applicants to avoid responsibility for considering any alternatives. These include reliance on the Michael Shanks MP response to Parliamentary written question 19898 which clearly references an earlier version covering a Morecambe Bay scheme. Driven solely by a connection at Penwortham, the Applicants looked for complex</p>	<p>The Applicants refer Newton with Clifton and Freckleton Parish Councils to the response to REP1-183 1.2.</p> <p>With regard to comments made in relation to the selection of landfall the Applicants refer Newton with Clifton and Freckleton Parish Councils to Volume 1, Chapter 4: Site Selection and Consideration of Alternatives (AS-026) and specifically Annex 4.1: Selection and refinement of cable landfall (APP-031), which sets out the process the Applicants undertook to select a suitable landfall location.</p>

Reference	Written Representation Comment	Applicants' response
	<p>and costly engineering solutions rather than simple options and continue to refuse to acknowledge any possibility of an alternative route.</p> <p>Likewise, the Applicants also defer the decision on landfall to National Grid without applying any critical questions either to the decision, or to the rationale for that decision, which is based on outdated and inaccurate understanding of the situation.</p> <p>The Moor Vannin proposal shows that a wider landfall area can be considered and would allow the option of the 'alternative route' with all the advantages that the Applicants have ignored.</p> <p>EN5 2.3.17 seeks the reduction of impacts. It is telling that the Applicants repeatedly defer to National Grid any responsibility for the decision on landfall, route and connection point. There remains no acceptance of any responsibility by the Applicants for options to get power to Penwortham; instead they simply 'do as they are told.'</p> <p>Landfall should be based on the shortest and most direct route. The alternative route is shorter, has available landfall, connects to an available substation and whose owner wants it. It meets all four criteria in the Holistic Network Design Review (HNDR)</p> <p>—</p> <ol style="list-style-type: none"> 1. Cost to consumer - Predicted saving via alternative option of £900m 2. Deliverability and Operability - Maximises use of existing infrastructure with room for additional infrastructure on a Government Enterprise Zone brownfield site 	

Reference	Written Representation Comment	Applicants' response
	<p>3. Impact on environment - Removes the bird-strike issue completely, the need to impact on RAMSAR and protected sites and requirement to use Greenbelt land</p> <p>4. Impact on local communities - Removes the impacts on local communities, environment, health & welfare and businesses totally</p> <p>The Applicants said that Stanah substations would need more 400KV cabling but this is incorrect. It is already 400kV.</p> <p>The alternative proposed removes all of the issues that follow, without exception, and also would benefit the offshore route by taking the cable path outside of a protected offshore area close to Blackpool.</p>	
REP1-183 1.9	<p>Site selection and joined up approach</p> <p>The Site selection was predetermined given the extension of search area from 5km to 8km, and the downgrading of taking 22Ha of Green Belt to Amber instead of Black or Red. In general the Applicants' comparison of alternative routeings was not clearly explained and may have been flawed.</p>	<p>The Applicants have made clear that the site selection process was not pre determined, and the process undertaken by the Applicants is set out in detail within Volume 1, Chapter 4: Site Selection and Consideration of Alternatives (AS-026) and its supporting annexes.</p> <p>With regard to the increase in the area of search from 5km to 8km, the justification for this is further set out within ISH1_10, Agenda item 4(d) of the Applicants' response to Hearing Action Points due at Deadline 1 - Rev F01 (REP1-037).</p>
REP1-183 1.10	<p>It has become clear that far from being a joined-up proposal there are no benefits to local communities of a joint proposal from the Applicants. Their proposal maximises the impact to the area. There are concerns about the corporate structure of the Applicants and their financial viability.</p>	<p>With regard to the benefits of a joint proposal the Applicants refer Newton with Clifton and Freckleton Parish Councils to sections 3 and 7 of the Applicants' response to Hearing Action Points: ISH1 6, 8, 9, 19, 26 & 28 - Rev F01 (REP1-039).</p>

Reference	Written Representation Comment	Applicants' response
		With regard to the corporate structure and financial viability of the Applicants please refer to the Funding Statement submitted as part of this application (APP-008) and the response to CAH1_8 within The Applicants' response to Hearing Action Points due at Deadline 1 (REP1-037).
REP1-183 1.11	<p>The Applicants refuse to commit to a single period of construction, instead wanting to allow a period of up to four years between schemes, with 3 years for the first scheme, up to four years gap and then a further 3 years that could be extended resulting in a total period of at least 10 years allowed. This is only of benefit to the Applicants and not to local communities impacted by these proposals.</p> <p>A truly strategic approach would mean one set of works and one substation minimising impact. One proposal could wait for the other to ensure this and a limit for the overall time could be set. These matters can be enforced in the DCO.</p>	<p>The Applicants have provided a detailed submission on construction scenarios Rule 9 - ES assessment of Construction Scenarios (AS-070). The Applicants refer Newton with Clifton and Freckleton Parish Councils to sections 1.4 and 1.5 of this document which provide further detail with regard to the need for project flexibility and the construction scenarios used for assessment purposes.</p> <p>With regard to the appropriateness of one project waiting for another the Applicants have responded to this matter within section 8 of the Applicants response to Hearing Action Points: ISH1 6, 8, 9, 19, 26 & 28 - Rev F01 (REP1-039)</p>
REP1-183 1.12	<p>Consultation and engagement with stakeholders</p> <p>It is clear that there are numerous examples of where there is a lack of clarity, a lack of engagement with major stakeholders and failure to respond constructively to reasonable requests from the Panel and others. This lack of engagement is reflected in the lack of detail in the Applicants' submission and impacts such as bird strike being missed. The lack of detail shows poor preparation, poor engagement with stakeholders and poor co-ordination between the two sides of the project.</p>	<p>The Applicants are committed to open and transparent communication with stakeholders. As such, the Applicants undertook early engagement and extensive consultation with stakeholders throughout the development of the Transmission Assets application, as evidenced in the Consultation Report (APP-170) and associated annexes.</p> <p>A coordinated approach was taken by the Applicants to consultation and engagement with stakeholders. This includes Expert Working Groups (EWGs) and technical engagement forums to discuss topic specific areas with the relevant stakeholders. Meetings with these stakeholder groups have been held regularly since Q1 2023 to provide the opportunity for stakeholders to give feedback and advice to inform the Environment Impact Assessment (EIA) and Habitats Regulations Assessment (HRA) processes, as well as project development and refinements.</p>

Reference	Written Representation Comment	Applicants' response
		Whilst the Applicants recognise there are outstanding matters to be resolved through the examination process, the Applicants are engaged with stakeholders with the aim of resolving these matters, as far as reasonably practical (during examination and beyond), including such matters regarding bird strike.
REP1-183 1.13	Agriculture <p>The failure to ensure concurrent rather than sequential construction will have a detrimental effect on local landowners and farmers. Instead of farmers losing their land for 3 years they will lose it for up to 10 years, or even more if construction of the second project takes longer than estimated. There is little opportunity for any activity 'in-between' and livestock herds cannot be turned off, on, off and on again during a 10 year period. Equally, arable land will be damaged during construction with too little time to recover before further damage and disruption in the second wave of construction. The financial impact of this prolonged construction is profound and possibly permanent.</p>	<p>The assessment of the effects of construction on farm holdings in ES Volume 3, Chapter 6: Land Use and Recreation (APP-104) Section 6.11.3 and is based on the Maximum Design Scenario of the sequential construction of the Project. Additional clarity and justification on construction scenarios was provided in 'Rule 9 - ES assessment of Construction Scenarios' (AS-070) Sensitive holdings, including intensive livestock enterprises are included in this assessment which concludes, at Paragraph 6.11.3.24 that the effect of the Project on farm holdings during the construction phase will be of moderate adverse significance, which is significant in EIA terms.</p> <p>The Applicants are committed to seeking voluntary agreements for the land rights sought which will include appropriate financial payment. In addition to compensation for the land taken / land rights sought, there may also be elements of claim under Severance, Injurious Affection and Disturbance, these claims would be settled in line with the Land Compensation Act 1961, Land Compensation Act 1973 and Compulsory Purchase Act 1965</p>
REP1-183 1.14	Beach Access <p>The prospect of a beach closure at St Annes was dismissed by the Applicants, whereas it is clear that closures of the beach will occur and there appear to be no mitigation plans for access in place. The Applicants refused to provide plans for the beach when asked by the Inspectors.</p> <p>Furthermore there is an outstanding risk assessment and engagement with the Environment Agency which means their commitment is not secured. There is an ecosystem under the dunes that has not been adequately considered by the Applicants and any damage has no planned mitigation.</p>	<p>The Applicants have addressed the matter of beach access within Annex 5.3 to the Applicants response to Hearing Action Points: ISH1 13, 14, 16, 17 (REP1-040). Further details of the public access of the beach during construction is further detailed in The Outline Open Space Management Plan which is Appendix A, of the Outline Public Rights of Way (PRoW) Management Plan (AS-048). This sets out the discrete working areas that will be subject to access management during construction works.</p> <p>The Applicants provided an update on the progress of discussions with the Environment Agency in relation to their relevant representation previously within ISH1_49 (REP1-037). Both parties are maintaining a collaborative approach, with further meetings scheduled to progress outstanding matters.</p> <p>See the Applicants response to RR-1601.51 (PDA-014), RR-0677.4 (PDA-010) and RR-1616.30 (PDA-025). The Applicants have made a commitment (CoT128)</p>

Reference	Written Representation Comment	Applicants' response
		of Volume 1, Annex 5.3: Commitments Register of the ES (AS-030)) to undertake hydrogeological risk assessment(s) at the detailed design stage to manage the risks associated with the installation of the export cables underneath the Lytham St Annes Dunes SSSI. This is secured under Requirement 8 (CoCP) of Schedules 2A & 2B of the draft DCO (F 1.5.3/F03). The Applicants are progressing discussions on the hydrogeological risk assessment with the Environment Agency and Natural England, and have committed to sharing and discussing the outcomes of a Preliminary Hydrogeological Risk Assessment with the Environment Agency and Natural England in advance of submission into the Examination at Deadline 3.
REP1-183 1.15	Air safety We are concerned at the lack of engagement with BAe Systems and the failure to commit to a survey. Their importance to us in terms of our defence, and to the local economy is profound and would be compromised without an agreement on managing bird strikes. The Applicants are sluggish and unresponsive to legitimate concerns on air safety and the future of BAe Systems. Indeed, it seems that no likely mitigation is available according to BAe Systems. The alternative removes this risk entirely.	The Applicants continue to engage both Blackpool Airport and BAe Systems with regard to aviation safety. A Strategy for Wildlife Hazard Management Plan (S_D2_14) has been submitted at Deadline 2 to support ongoing discussions between the Applicants, Blackpool Airport and BAe. The Applicants refer Newton with Clifton and Freckleton Parish Councils to the response to REP1-183 1.3 above.
REP1-183 1.16	Community Benefits Unfortunately, the Applicants avoided defining any community benefits until the application has been approved and so cannot be regarded as benefits in reaching a decision on the application. TASC has offered to engage with the Applicants about how community benefits, in line with Government guidance issued on 9th April 2025, might work if the proposal was approved. This was rejected out of hand by the Applicants. The new community funds guidance means communities should get £530,000 per substation.	As noted in the Statement of Reasons (REP1-012) submitted by the Applicants at Deadline 1, the Applicants are committed to delivering a community benefit fund in line with the Community Funds for Transmission Infrastructure guidance recently published (updated 9 April 2025) by the Department for Energy Security and Net Zero. The guidance sets out the government's recommendation for the level of funding that developers should consider for community benefit, which is outlined to be £530,000 for each onshore substation. To ensure the benefits of the Transmission Assets can be realised at a local level, engagement around community benefits will be undertaken by the Applicants later this year with key local stakeholders who fall within the order limits of the Transmission Assets. Key local stakeholders will include, but not be limited to,

Reference	Written Representation Comment	Applicants' response
		<p>local authorities, parish, community and/or town councils, elected representatives, as well as the Transmission Assets Steering Committee.</p> <p>As the Applicants noted at ISH 1, any community benefit fund is not a material consideration in the determination of the Transmission Assets Application and engagement will be undertaken separately from the DCO Examination.</p>
REP1-183 1.17	<p>Cumulative Impact</p> <p>Existing projects within the Parish already cover 225 acres with nuclear and solar energy – larger than the villages of Newton with Scales and Clifton together. In addition there are two proposed solar farms making another 249 acres. One of these is adjacent to the application's proposed substations, planning application with reference 24/0541 on the Fylde Council website "Installation of a 32 hectare solar farm with associated infrastructure including: series of solar photovoltaic arrays, switch rooms, substations, inverters power stations, fencing, pole mounted CCTV cameras, access tracks and landscaping with biodiversity measures" on the land west of Parrox Lane, Newton with Clifton. Highways considered Parrox Lane unsuitable for HGVs, hence the Applicants have been forced to resubmit with an alternative access plan for construction which runs along Lower Lane, Freckleton (which is also proposed for this project's traffic) and then onto a bridleway, public right of way, leading onto a track which goes across the cabling route and crosses a Main River feeding the Ribble RAMSAR site. The Applicants' proposal clearly avoids these proposed solar farms but given they are likely to be considered by Fylde Borough Council Planning prior to the end of this DCO examination it is unclear how any conflicts in access would be addressed. These proposals in total would result in a non-stop sea of solar panels, substations and cabling route on the greenbelt and best and most valued farmland between Newton with Scales, Freckleton and Kirkham. It is very clear that there</p>	<p>The cumulative impacts of Newton Grange Bluefield solar farm (22/0204) and Clifton Marsh Solar Farm were considered in section 10.13 of Volume 3, Chapter 10: Landscape and visual resources (APP-123) The Applicants have committed to implementation of landscape proposals via detailed Landscape Management Plan(s) through CoT15, secured by Requirement 6 of the draft DCO ((C1/F04) Schedules 2A & 2B).</p> <p>An update to the CEA longlists has been undertaken and included in Volume 1, Annex 5.5: Cumulative screening matrix and location plan (REP1-020) to take account of applications submitted since submission and where status' have changed. The two schemes highlighted 24/0414 and 24/0541 have been included as part of these updates. An update to the assessment of cumulative effects will be submitted at Deadline 2 (S_D2_10).</p>

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	has been no consideration of the cumulative impact of these proposals on the local community.	
REP1-183 1.18	<p>Ecology:</p> <p>Many birds on the UK red list for birds of conservation concern have been observed on the land scheduled for the substations over the past 5 years, including: lapwing, grey partridge, greenfinch, house martin, marsh warbler, curlew, black tailed godwit, woodcock, dunlin, lesser spotted woodpecker, mistle thrush, herring gull, common cuckoo, swift, yellow wagtail, marsh tits, marsh warbler, skylark, yellowhammers house sparrows and starlings. Other protected species include great crested newts, hedgehogs and pipistrelle bats.</p> <p>From the Biodiversity Statement [AS-054] it seems that they are only providing biodiversity net gain (BNG) for the permanent land take. The rules require land that is used temporarily and not fully reinstated for two years also to be included in the BNG calculation; presumably that will apply to most of the cable routes, so they should be included as well.</p> <p>Any reduction in the quality of (the permanent) habitat at Newton March, Lytham Moss, Freckleton Marsh and Lea Marsh to discourage birds from visiting it will have a consequential effect on the biodiversity score so it may not be possible to satisfy BNG requirements (admittedly not yet a legal obligation but recommended in policy) and avoid increasing bird strike risk. The proposed habitat can be found on page 56 of APP-106.</p>	<p>Birds</p> <p>The Applicants would welcome any data that demonstrates the frequency with which these species utilise the area, the number of birds present, and how recently they have been observed..</p> <p>The Fylde Bird Club and two years of site-specific data were used to inform the baseline characterisation presented in F3.4.1 Volume 3, Annex 4.1: Breeding birds technical report (APP-091), F3.4.2 Volume 3, Annex 4.2: Wintering and migratory birds technical report – Part 1 of 2 (APP-092), and F3.4.2 Volume 3, Annex 4.2: Wintering and migratory birds technical report – Part 2 of 2 (APP-093)). The significance of an area for birds extends beyond mere presence or absence. For instance, the marsh warbler is a non-British vagrant, while the lesser-spotted woodpecker relies on woodland habitats that will not be lost. The Applicants also emphasise that their assessment took into account the conservation status of bird species (for full details on the assessment please refer to F3.4 Volume 3, Chapter 4: Onshore and intertidal ornithology (APP-090) with further detail on the desk study and survey findings within F3.4.1 Volume 3, Annex 4.1: Breeding birds technical report (APP-091), F3.4.2 Volume 3, Annex 4.2: Wintering and migratory birds technical report – Part 1 of 2 (APP-092), and F3.4.2 Volume 3, Annex 4.2: Wintering and migratory birds technical report – Part 2 of 2 (APP-093)).</p> <p>The Applicants' assessment is robust, as it is based on the number of birds and their frequency of use. The assessment concluded that mitigation measures should be provided for waders and farmland birds at Newton with Scales. This would benefit species such as lapwing, curlew, black-tailed godwit, yellow wagtail, skylark, and yellowhammer. The Applicants concluded that the impacts on other species would not significantly affect the population either nationally or locally; therefore, the effects would be considered negligible in terms of Environmental Impact Assessment (EIA).</p>

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	These points were summarily dismissed as BNG was not a legal requirement despite this being a government intention, that the Applicants were seeking to meet it, and would be a legal requirement later this year.	<p>Onshore Substations</p> <p>With respect to permanent impacts on habitats supporting protected species at the Onshore Substations, a District Level Licence (DLL) would be obtained from Natural England to mitigate for impacts on great crested newt. The Outline Ecological Management Plan (OEMP) (APP-212) includes mitigation for hedgehog (paragraph 1.6.4.29). The noctule bat roost near to Penwortham Substation will not be directly impacted, and appropriate measures to avoid disturbance will be adopted (a European Protected Species Mitigation Licence for disturbance may be required).</p> <p>Biodiversity Net Gain</p> <p>The completion of a Biodiversity Net Gain (BNG) assessment (including the use of the DEFRA metric calculator) is not yet mandatory for Nationally Significant Infrastructure Projects (NSIPs). As set out in the Biodiversity Benefit Statement (AS-055), the BNG assessment undertaken by the Applicant was voluntary. Proportionate biodiversity enhancements are proposed by the Applicant given that most of the project impacts are temporary and reversible.</p>
REP1-183 1.19	<p>Flooding</p> <p>It is unclear that all aspects of the questions posed regarding flooding and drainage have been fully accounted for. Examples of this relate to mitigation of the issues of interrupting the drainage water courses by the build work especially if it is not known exactly what has been done previously and these works lie hidden below ground, which many drains will do, especially on farmland.</p> <p>Much of the land is already prone to flooding.</p>	<p>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 within RR-704.9.2 (PDA-006).</p>
REP1-183	Heritage	<p>The Applicants are aware of the locations of all heritage assets recorded on the Lancashire Historic Environment Record (HER) and on the National Heritage List</p>

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1.20	<p>The Lancashire Historic Environment Record shows there are Bronze Age Cairns, Roman Fort settlements and Quaker burial grounds. Freckleton, Newton and Kirkham are all mentioned in the Domesday book. There have been numerous Roman finds in the areas of Kirkham and Dowbridge areas, where there was access to the sea along the river Dow. Indeed one of the tracks proposed for HGV access south of Newton is called 'Thames Street'. The Lancashire Historic Environment Record states: "This area of Lancashire is considered to be one of the richest areas of Neolithic to Bronze Age activity within the North West" therefore causing potential damage to future archaeological research and buried artefacts.</p> <p>Allegedly the church and lost hamlet of Kilgrimol may remain buried in the sands under the site of the incoming cable route, between Starr Gate and St Annes.</p>	<p>for England (NHLE). A programme of further archaeological work to be undertaken prior to construction is set out in the Outline Onshore and Intertidal Written Scheme of Investigation (APP-214), which is secured through Requirement 11 within Schedules 2A and 2B of the Draft Development Consent Order (REP1-008).</p> <p>A discussion of the potential location of the 'lost' settlement of Kilgrimol is presented in paragraph 1.5.6.5 of ES Volume 3, Annex 5.1: Historic environment desk-based assessment (APP-097).</p>
REP1-183 1.21	<p>Local economy</p> <p>We welcome the Planning Inspectorate seeking a review of the impact of the proposals on the Fylde rather than the whole North West, taking into account of Fylde being a peninsula. The current approach is too high level and the assessment is not appropriate.</p>	<p>The Applicants refer Newton with Clifton and Freckleton Parish Councils to the Applicants' response to Hearing Action Points: ISH1 52 - Rev F01 - Rev F01 (REP1-046).</p>
REP1-183 1.22	<p>National Planning considerations</p> <p>The NPPF sets out the need for "very special circumstances" to justify use of Green Belt land and that there should be consideration of public health and wider defence and security issues. The Applicants' case does not adequately justify the</p>	<p>The Applicants are unclear where the reference to 'consideration of public health and wider defence and security issues' derives from as it is not set out in either the National Policy Statement EN-1 or the NPPF.</p> <p>With reference to Green Belt policy in both the NPS and NPPF, the Applicants note paragraph 5.11.22 of NPS EN-1 which states:</p>

Reference	Written Representation Comment	Applicants' response
	use of green belt or take adequate account of these other issues.	<p><i>An applicant may be able to demonstrate that particular energy infrastructure, such as an underground pipeline, may be considered an “engineering operation” and regarded as not inappropriate in Green Belt. This is provided it preserves the openness of the Green Belt and does not conflict with the purposes of Green Belt designation. It may also be possible for an applicant to show that the physical characteristics of a proposed overhead line in a particular location would not have so harmful an impact as to conflict with the purposes of Green Belt designation, or with other protections of rural landscape.</i></p> <p>And paragraph 160 of the NPPF:</p> <p><i>When located in the Green Belt, elements of many renewable energy projects will comprise inappropriate development. In such cases developers will need to demonstrate very special circumstances if projects are to proceed. Such very special circumstances may include the wider environmental benefits associated with increased production of energy from renewable sources.</i></p> <p>The Applicants' approach to site selection in general has been sequential (as evidenced by the staged approach within Volume 1, Chapter 4: Site Selection and Consideration of Alternatives (AS-026) and Volume 1, Annex 4.3: Selection and Refinement of the Onshore Infrastructure (AS-028)), and has considered both Green Belt and non-Green Belt land. See Applicant's response to Hearing Action Point ISH1_7 (REP1-037) for more information on how Green Belt was considered within the site selection and consideration of alternatives process.</p> <p>The Applicants consider that the Transmission Assets benefit from the presumption given to Critical National Priority Infrastructure (CNP Infrastructure) as evidenced in Section 3.4.4 of the Planning Statement (REP1-032) and set out in NPS EN-1 (paragraphs 4.2.16 and 4.2.17). Paragraph 4.2.16 of NPS EN-1 states that CNP Infrastructure is assumed, as a starting point, to have met any tests which are set out within the NPSs or any other planning policy, which requires a clear outweighing of harm, exceptionality or 'Very Special Circumstances, provided that the Applicants demonstrate (as they have) that the mitigation hierarchy requirements have been met (set out in section 3.4.4.15 of the Planning Statement (REP1-032)).</p>

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REP1-183 1.23	Recreation Spaces It is disappointing that the Applicants wrongly excluded Sport England as a Statutory Consultee. As with other areas there is a lack of clarity about the nature of the works proposed and a lack of detail regarding the impact of the proposed works on recreation areas in the Fylde.	<p>The Applicants have confirmed that Sport England are not a statutory consultee for the purposes of this application as they are not listed in Schedule 1 of the Infrastructure Planning (Applications: Prescribed Forms and Procedures) Regulations 2009 which sets out the statutory or 'prescribed' consultees for NSIPs.</p> <p>The Applicants have undertaken an assessment of potential impacts on recreation within Volume 3, Chapter 6: Land use and recreation (APP 104). Section 6.6.3 sets out the baseline in terms of recreational resources used within the assessment. Section 6.11.4 presents the impacts on recreational resources.</p>
REP1-183 1.24	Safety Because of the location of Blackpool Airport, there are only two north / south major arterial roads between Blackpool and St Anne's. One is Clifton Drive to the west of the airport and the other is Queensway to the east of the airport. Both roads become major bottlenecks when planned roadworks are carried out on just one side of the airport, causing long queues of traffic and severe delays. Both these roads will need to be crossed by the cable route. We have not seen any 'emergency vehicle impact statement' in relation to access by Police, Fire, Ambulance and Coastguard emergency vehicles.	<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 (F 1.5.3/F03)). This commitment to the use of trenchless techniques is secured via Requirement 8 (Code of Construction Practice) of Schedules 2A and 2B of the draft DCO (REP1-008)). This commitment to the use of trenchless installation techniques will ensure that there are minimal restrictions on traffic movements (including emergency services) on these roads.</p>
REP1-183 1.25	Stakeholder Engagement We are also concerned that many other issues remain unresolved. These include: <ul style="list-style-type: none"> The LPG and liquid ethylene routes which are crossed by the cabling route Impact of increased traffic, including heavy goods vehicles, on pedestrians, motorised wheel chair users, horse riders, and cyclists Concerns about birdstrike impacting on air safety for local people. There is major local sensitivity on this subject. In 1944, an aircraft crashed into a school in 	<p>LPG and Ethylene Routes</p> <p>The Applicants have identified these assets during the development process. The Applicants are in ongoing discussions with all relevant statutory undertakers. The status of current discussions with the relevant statutory undertakers (Cadent Gas Limited, National Gas Transmission PLC and SABIC is presented within Rows 2, 9 and 14 respectively of the Land Rights Tracker (REP1-0650) submitted at Deadline 1. The Applicants are confident all matters can be agreed before the close of examination.</p> <p>Increased Traffic</p>

Reference	Written Representation Comment	Applicants' response
	<p>Freckleton, killing many children and it remains the worst air disaster for loss of life on the ground in England.</p> <ul style="list-style-type: none"> Concerns about the failure to agree a transport plan and its impact on traffic accidents and fatalities. Substation failure and proximity to residential areas as shown by three recent examples of substation fires. Penwortham substation access where whilst there is development capacity for limited expansion this is likely to be consumed by National Grid NESO plans for development of the grid itself. In addition, there are issues with access to the site with existing roads being single track and designed for light traffic only. Helical Technology on Hillhouse Lane, Warton, who have never been consulted by the Applicants The proposed Development Areas for the MMWF project and National Grid overlap and clash. NGET have made it clear to the Applicants that they need to negotiate the access to the Penwortham site – the MMWF proposals currently clash with proposed NGET site development 	<p>Volume 3, Chapter 7: Traffic and Transport of the Environmental Statement (APP-108) contains an assessment of the potential impacts from the Project on traffic and transport receptors. To inform the assessment, the Applicants have undertaken a comprehensive data collection exercise including capturing of baseline traffic flows, speeds, identification of sensitive receptors and collisions for all highway links within Blackpool Council, Lancashire County Council and National Highways administration areas. In total, data for 91 highway links have been collected covering over 155 km of highway network. The assessment has considered the potential impacts of the Project in relation to driver delay, severance, non-motorised user delay, fear and intimidation, road safety and abnormal loads. The assessment concludes (with the application of mitigation measures) that the residual effects would not be significant in Environmental Impact Assessment (EIA) terms.</p> <p>Hazard Management (bird strike)</p> <p>The Applicants refer Newton with Clifton and Freckleton Parish Councils to the response to REP1-183 1.3 above.</p> <p>Transport Plan</p> <p>A comprehensive Outline Construction Traffic Management Plan (OCTMP) has been submitted with the DCO application. The Applicants have met with Lancashire County Council, National Highways and Blackpool Council to discuss their comments on this outline plan and are processing updates that have been submitted at Deadline 2 (J5/F02). The Applicants would note that the plan is an outline document that would be developed into a detailed CTMP prior to commencement of construction. The requirement to agree the detailed CTMP(s) with the relevant highway authority is secured by Requirement 9 of Schedules 2A and 2B of the draft DCO (CREP1-008).</p> <p>Substation Safety</p> <p>The substations and its equipment will be designed to the relevant standards including all separation distances between phases and equipment. All of the main installed equipment will be new and will follow a detailed process of factory acceptance testing and site acceptance testing along with a comprehensive commissioning plan. No equipment will be put into service until it has met the</p>

Reference	Written Representation Comment	Applicants' response
		<p>required standard. There will be regular maintenance of the equipment in line with the manufacturers requirements. Each substation will have a detailed fire risk assessment and safety systems installed to minimise any risks, these may include fire suppression systems, fire alarms with link to services, CCTV to observe any alarms, fire safety sealant between rooms, fire doors in buildings and external fire walls at Transformers, Reactors etc.</p> <p>Hellical Technology</p> <p>The Applicants provided an update on engagement with Hellical Technology within ID5 of The Applicants' Hearing Summary of the Compulsory Acquisition Hearing 1 - Rev F01 (REP1-036)</p> <p>National Grid</p> <p>The Applicants continue to engage with NGET regarding the Project's interaction with their assets. The status of negotiations is set out within Part 2 of the Land Rights Tracker (REP1-065), the Applicants are confident that matters can be agreed before the close of examination.</p> <p>Penwortham Access</p> <p>The Applicants would note that there are no existing restrictions preventing access to Penwortham substation for HGVs (via Howick Cross Lane) and would note that this route is used by National Grid to maintain the substation. Notable, Table 7.21 of Volume 3, Chapter 7: Traffic and Transport of the Environmental Statement (APP-108) identifies that this link currently carries in the region of 13 HGVs a day. Notwithstanding, the Applicants accept that there are width constraints along this route and are proposing additional measures within an update to the OCTMP (J5/F02) (submitted at Deadline 2) to assist in managing this.</p>
REP1-183 1.26	<p>Traffic and Transport</p> <p>There are already issues with existing road capacity and delays. This includes the M6 access to the Fylde where there are regular accidents and delays. It also includes Preston Road</p>	<p>The Applicants do not agree that the plans are 'flawed' and with regard to safety would direct the Parish Councils to section 7.6.5 of the Volume 3, Chapter 7: Traffic and Transport of the Environmental Statement (APP-108) which includes a comprehensive review of road safety.</p> <p>With regard to the routes that are of constrained width and moss roads, the Applicants are in discussions with Lancashire County Council in regard to these</p>

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	<p>Lytham which prevented some members of the public attending the hearings.</p> <p>We support the concerns expressed by Lancashire County Council (LCC) about flawed traffic plans and the need to not compromise on safety. In particular we have concerns about 5km of roads that do not appear able to take this level of traffic either in terms of road quality or sharing with pedestrians etc. These include “moss roads” which LCC has a specific policy for and which are not suitable for heavy vehicles. There was not an opportunity to examine this in depth at the Issue Specific Hearing.</p> <p>There remains no detailed or agreed transport plans as sought by LCC and Fylde Borough Council.</p>	<p>matters and have agreed to include additional measures within an update to the Outline Construction Traffic Management Plan (OCTMP) at Deadline 2 (J5/F02).</p> <p>With regard to comments on agreeing transport plans the Applicants refer the Councils to its response to REP1-183 1.24 above.</p>
REP1-183 1.27	<p>Applicants' Ability to deliver</p> <p>The Examining Authority have already posed questions about the arrangements for delivery of the project. These include a lack of co-ordination of any kind on sequencing the projects for the benefit of local communities, and businesses, arguably the whole purpose of the Holistic Network Design project, the lack of a single JV or a unified team to run the project and the financing and governance for the project, particularly after the fundamental reset by BP. Our concern is that these failings will result in a ‘zombie’ project clogging up the route for other more viable and less damaging windfarm projects.</p>	<p>The Applicants would refute the statement that there is “a lack of co-ordination of any kind on sequencing”. The submission of this Joint DCO by the Applicants is the first of its kind and has demonstrated an unprecedented level of cooperation between completely independent developers over the last two years.</p> <p>The Applicants have not ruled out further collaboration post-examination, however as previously stated the DCO application needs to take into account the other activities/pre-requisites the Applicants need to complete prior to being able to start construction works. These activities are subject to external influences i.e. CfD Auctions, Financial Investment and supply chain availability and therefore the Applicants are unable to provide specific commitments on co-ordination during delivery at this point in time.</p> <p>The Applicants understand the concern from the parish councils on delays to the Project's delivery and creating prolonged uncertainty to the local communities. The Applicants are fully committed to delivering these projects as soon as reasonably practicable and will continue to engage external stakeholders and the parish</p>

Reference	Written Representation Comment	Applicants' response
		councils on developments and delivery timelines for the projects construction as it continues to refine its design. The Applicants do wish to reiterate that there has been significant assessment and development to refine this route and do not see that the proposal conflicts with any other proposed windfarm projects.