

# MORGAN AND MORECAMBE OFFSHORE WIND FARMS: TRANSMISSION ASSETS

**Applicants' Response to IP submissions received at Deadline 2**

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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 2, 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) are set out in the subsequent sections of this document and its annexes.
- 1.1.1.3 The Applicants have numbered the WRs and post hearing submissions in line with the Planning Inspectorate's document library, with subsequent paragraph number, e.g. REP1-001.1, REP1-001.2, etc.
- 1.1.1.4 This document is accompanied by the following annexes:
- Annex 2.1 to Applicants IP submissions at Deadline 2: Fylde Council (Document reference: S\_D3\_2.1)
  - Annex 2.2 to Applicants' Response to IP submission: Marine Management Organisation (Document reference: S\_D3\_2.2)
  - Annex 2.3 to Applicants' Response to IP submissions: Response to Natural England (Document reference: S\_D3\_2.3)



## 2 Responses to Written Representations

### 2.1 BAE Systems

**Table 2.1: REP2-052 –BAE Systems**

Reference	Written Representation Comment	Applicants' Response
REP2-052 052.1	<p><u>Introduction</u></p> <p>This Statement sets out BAE Systems' comments on submissions made by the Applicants at Deadline 1. It provides comments on the following submissions:</p> <ul style="list-style-type: none"> <li>• The Applicants' Deadline 1 Cover Letter (Document S_D1-1 / Examination Library Ref: REP1-001)</li> <li>• The Applicants' Response to Hearing Action Points due at Deadline 1 (Document S_D1_5 / Examination Library Ref: REP-037)</li> <li>• The Applicants' Hearing Summary of the Issue Specific Hearing 1: Day 1 (Document S_D1_2 / Examination Library Ref: REP1-034)</li> <li>• The Applicants' Hearing Summary of the Issue Specific Hearing 1: Day 2 (Document S_D1_3 / Examination Library Ref: REP1-035)</li> </ul>	The Applicants note this comment.
REP2-052 052.2	BAE Systems' comments on these documents below also make reference to other Examination Library documents, where the above-listed documents contain cross references to such documents.	The Applicants note this comment.
REP2-052 052.3	BAE Systems also notes that the Defence Infrastructure Organisation (DIO) has provided comments at Deadline 1 (Examination Library Reference REP1-075). The DIO objects to the proposed development on the bases that there is	The Applicants refer BAE Systems to REP1-075 75.2 within S_D2_3 Applicants' Response to Written Representations from Statutory Consultees and other Organisations (REP2-031). In addition, an Outline Wildlife Hazard Management Plan (S_D3_8) which will form an appendix

Reference	Written Representation Comment	Applicants' Response
	currently insufficient information to allow necessary assessments to be completed for the determine whether the development could result in an increased risk of bird strike and the degradation of aviation safety in general. These comments echo BAE Systems submissions at various stages of the Examination.	<p>to the Outline Ecological Management Plan (REP2-018) has been submitted at Deadline 3, as explained within the Strategy for Wildlife Hazard Management Plan (REP2-047) submitted at Deadline 2.</p> <p>REP2-047 also commits to provision of updated information within the outline Ecological Management Plan to provide sufficient information to inform a wildlife attractant habitats risk assessment for all on-aerodrome and off-aerodrome areas within the study area to be undertaken by the Transmission Assets. The wildlife attractant habitat risk assessment will identify any bird species which may be attracted to the work areas due to increase in potential food sources, standing water or any other factor which may attract birds. A draft of the wildlife attractant habitat risk assessment is included within the outline Wildlife Hazard Management Plan (S_D3_8) submitted at Deadline 3. An updated oEMP was submitted at Deadline 2 (REP2-018). The Applicants have committed to provision of information to BAE Systems (and DIO) to allow necessary assessments to be completed by the aerodrome in accordance with their requirements under CAP 795 – Safety Management Systems and CAP 772 – Wildlife Hazard Management at Aerodromes.</p>
REP2-052 052.4	<p><b><u>THE APPLICANTS' DEADLINE 1 COVER LETTER</u></b></p> <p>The Applicants' covering letter to in respect if their Deadline 1 submissions states the following in relation to the engagement undertaken with BAE Systems:</p> <p><i>"The Applicants met with ..... BAE Systems on Monday 12 May and again on Monday 19 May, in relation to agreeing a strategic approach to resolving concerns related to potential bird strike associated with the proposed ecological mitigation areas. A proposal has been discussed with Blackpool Airport and BAE Systems and submitted to both stakeholders for consideration."</i></p>	The Applicants note this comment.



Reference	Written Representation Comment	Applicants' Response
REP2-052 052.5	<p>In relation to the above comment, the Applicants have not provided BAE Systems with a substantive proposal for resolving the organisation's bird strike risk concerns. A high level strategy note has been provided the day before Deadline 2. This provides an overview of the steps that would be taken to formulate a "Wildlife Hazard Management Plan". The document received contains an outline of how the Applicants will identify baseline bird population data and very high level information on what will be included in a management plan. No information has been provided on how the appropriateness of mitigation measures will be assessed. Therefore, there is still disagreement between BAE Systems and the Applicants over the need for a Bird Strike Risk Assessment and the potential changes to bird numbers, concentrations and flight paths that need to be considered in such an assessment, and the extent of mitigation that may need to be considered in a Mitigation Plan.</p>	<p>The Applicants note the comment and confirm that the Strategy for Wildlife Hazard Management Plan (REP2-047) is the initial stage in the process and the Applicants are seeking feedback from BAE Systems on its proposed approach. The Applicants have prepared a Baseline Technical Note (S_D3_5) and draft Outline Wildlife Hazard Management Plan (S_D3_8) for submission at Deadline 3. These documents provide further information on the baseline bird populations, an initial wildlife attractant risk assessment and proposed an approach for monitoring the risk.</p> <p>The Applicants note that management plans (including the Outline Wildlife Hazard Management Plan) are outline at this stage, prior to detailed design and alignment of the details to be included in the relevant management plans. The detailed Wildlife Hazard Management Plan will be agreed post consent, in consultation with BAE Systems, as part of the discharge process of the outline Ecological Management Plan (REP2-018), as secured by Requirement 12 of Schedules 2A and 2B of the draft DCO (REP2-004).</p> <p>The Applicants understood that the aerodromes would want to manage and incorporate additional hazards caused by the Transmission Assets into their existing plans. The Strategy for Wildlife Hazard Management Plan (REP2-047) refers BAE Systems to the CAP 772 guidance which states that: "<i>The aerodrome operator should develop and maintain a systematic method of obtaining information regarding hazardous wildlife species and their habitats to manage them effectively</i>". The Applicants have committed to providing the necessary information to feed into the existing bird strike risk assessment operated by Warton Aerodrome, and have requested a copy of BAE's existing wildlife hazard management to ensure the information provided is appropriate. No information has been received from BAE in response to this request.</p> <p>The Applicants note that Blackpool Airport have initially agreed to this approach and are proactively working with the Applicants in production</p>

Reference	Written Representation Comment	Applicants' Response
		of the draft outline Wildlife Hazard Management Plan (S_D3_8) submitted at Deadline 3. The Applicants will further discuss the approach with BAE to ensure any additional hazards, as a result of the Transmission Assets is agreed by the end of examination.
REP2-052 052.6	BAE Systems has issued comments on the high level summary to the Applicants, stating that it omits a number of essential considerations, including an assessment of how bird strike risk may change as a result of the proposed development. BAE Systems' Deadline 1 Representations (Examination Library Ref: REP1-112) provides a summary of what it would expect to see in a Bird Strike Risk Assessment and the types of mitigation that should be considered.	The Applicants welcome the comments from BAE Systems and have sought to incorporate the feedback into the updated strategy. The Applicants have prepared an Outline Wildlife Hazard Management Plan (S_D3_8) for Deadline 3 which is cognisant of CAA's CAP772 guidance and takes into account BAE Systems' Deadline 1 Representation (REP1-112).
REP2-052 052.7	BAE Systems received a request from the Applicant one day before Deadline 2 for information to inform the baseline scenario in the above-referred to Wildlife Hazard Management Plan. The amount of information requested is significant and BAE Systems needs to consider whether there are any commercial sensitivities that may preclude the sharing of some information.	The Applicants confirm that information has been requested from BAE Systems regarding the baseline data they hold on bird numbers and patterns of use in the area from 2022. The Applicants discussed the information required to inform workstreams at a meeting on 12 <sup>th</sup> May (prior to Deadline 1) and again at a meeting on 19 <sup>th</sup> May, with the formal request for information submitted to BAE on 29 <sup>th</sup> May (a week before Deadline 2). A similar approach to obtaining information was made towards Blackpool Airport who submitted their Wildlife Hazard Management Plan at Deadline 1 (REP1-115) in response to initial engagement with the Applicants at a meeting on 15 <sup>th</sup> May (prior to Deadline 1). This submission from Blackpool Airport included baseline data. As explained in the Applicants' Strategy for Wildlife Hazard Management Plan (REP2-047) the first stage of understanding potential changes in bird strike risk, is to agree the baseline. The Applicants note that Blackpool Airport have initially agreed to this approach and are proactively working with the Applicants in production of the draft outline Wildlife Hazard Management Plan (S_D3_8) submitted at Deadline 3.

Reference	Written Representation Comment	Applicants' Response
REP2-052 052.8	<p>The Applicants' Deadline 1 Covering Letter also states makes reference to the status of a Statement of Common Ground (SOCG) between the Applicants and BAE Systems. To clarify, the Applicants did provide BAE Systems with an outline SOCG ahead of Deadline 1. That SOCG covered numerous topics that were not of relevance to BAE Systems' concerns or the discussions taking place between the Applicants and BAE Systems. BAE Systems considers that the outline SOCG was entirely unfit for purpose and requested that the Applicants provide a revised SOCG that focuses specifically on matters relating to the concerns raised by BAE Systems in its written representations and oral submissions (such as the need for various safeguarding assessments, bird strike risk, etc.). BAE Systems is committed to working towards a more detailed working draft of a SOCG with the Applicants ahead of Deadline 3.</p>	<p>The Applicants note the comment and welcome BAE Systems' agreement to engage on the SoCG, noting that the initial draft SoCG was submitted to BAE Systems to facilitate discussion on the inclusion (and removal) of topics. No comments were received by BAE Systems upon provision of the SoCG. Regardless, the Applicants confirm that they are updating the SoCG in line with discussions with BAE Systems. The Applicants provided an updated SoCG to BAE Systems on Wednesday 25<sup>th</sup> June and held a meeting with BAE Systems on Wednesday 2<sup>nd</sup> July, where the approach to the SoCG was discussed. An updated SoCG to reflect these discussions will be submitted immediately after Deadline 3 (before the next set of Issue Specific Hearings) at the ExA's discretion.</p>
REP2-052 052.9	<p>ISH1_21 Clarification on the AOD heights for both substations including the lightning rods</p> <p>BAE Systems made oral submissions during ISH in relation to inconsistencies in the submitted application documents over the proposed maximum heights of the substations and lightning rods (relating to whether stated heights are above finished ground level or above ordnance datum (AOD)) and requested that clarification is provided on the heights AOD. Heights AOD are considered necessary because they provided a fixed reference point (which will be needed for the necessary aviation safeguarding assessments that will need to be undertaken) and because finished ground levels are not identified in the application or the dDCO.</p>	<p>The Applicants note that BAE Systems have requested details regarding heights of onshore substation infrastructure above ordnance datum (AOD).</p> <p>The Applicants have provided additional information within the Landscape Planting Technical Note (S_D3_7) which includes details on the indicative cut and fill landscaping exercise to form the platform for the onshore substations. The finished ground level is used as the basis for the production of the onshore substation photomontage visualisations contained within Volume 3, Figures – Part 6 of 7 (APP-136). The Applicants note that these cross-sections are indicative only, used for the purposes of the impact assessment. The cut and fill landscaping exercise will be confirmed and reviewed as part of the commitments contained within the Design Principles (APP-209) and the discharge of Requirement 4 (Substation works) within Schedule 2A and 2B of the draft DCO (REP2-004).</p>

Reference	Written Representation Comment	Applicants' Response
	The Applicants' response to ISH1_21 provides clarification of heights above finished ground level, not AOD. ISH1_21 requires the Applicants to clarify heights AOD. This clarification has not been provided.	The Applicants are committed to providing the appropriate information to ensure the Transmission Assets do not affect the safe operation and development of Warton Aerodrome in relation to CNS. The Applicants will proactively assist in the provision of information should BAE Systems, as communicated in the Applicants' Response to Written Representations from Statutory Consultees and other Organisations (REP2-031) REP1-112 112.10
REP2-052 052.10	<p>ISH1_39 Applicants to explain the site selection for the mitigation areas and biodiversity benefit sites and additional detail on those areas such as target species</p> <p>During the meeting between the Applicants and BAE Systems on 19 May 2025, the Applicants only provided BAE Systems with a high level overview of the site selection process. Details were not provided on how aviation impacts were considered in the site selection process, and what weight was given to them, or the alternatives that were considered. Details of target species was also limited.</p> <p>The meeting focused on the mitigation areas, with no information provided on how the biodiversity benefit sites were identified, why they have been proposed, or what factors were considered in the identification of the location of these sites.</p> <p>The Applicants have stated their intention to provide further details at Deadline 2. BAE Systems will review any submission made and provide comments at Deadline 3</p>	The Applicants submitted a document at Deadline 2 that described the site selection process for the environmental mitigation and biodiversity benefit areas. The Site Selection of the Environmental Mitigation and Biodiversity Benefit Areas (REP2-046) provides the criteria that were applied to the site selection process and the target species. The Applicants confirm that proximity to the Warton Aerodrome and Blackpool Airport were factors considered during the site selection process and that alternative sites were discounted due to potential impacts on the airports.
REP2-052 052.11	<p>ISH1_40 Applicants to provide an update with reasons on why aviation safeguarding assessments are not being provided.</p> <p>BAE Systems' comments on the Applicant's responses are as follows: I. BAE Systems would be responsible for</p>	I) The Applicants note this response and are committed to continuing the ongoing engagement with BAE Systems to ensure that Warton's obligations under the Air Navigation Order (ANO, 2016) and its requirements to the Civil Aviation Authority (CAA) under its Aerodrome

Reference	Written Representation Comment	Applicants' Response
	<p>undertaking OLS, CNS and Instrument Flight Procedure (IFP) safeguarding assessments. However, as the Applicants are the party who would be creating a change in the area that means that such safeguarding assessments are necessary, BAE Systems will be requesting that the Applicants reimburse BAE Systems for the costs of undertaking those assessments.</p> <p>II. It is not BAE Systems' responsibility to undertake a bird strike risk assessment. That is the responsibility of the Applicants. BAE Systems (and now the Ministry of Defence (MOD) Defence Infrastructure Organisation (DIO) (see its written representations at Deadline 1 (Examination Library Ref: REP1-075)) have raised concerns over the potential for increased bird strike risk and objected to the proposed development on the basis that insufficient information has been provided to demonstrate potential aviation impacts, including bird strike risk. It is the Applicants' responsibility to demonstrate that increased risk would not occur or can be mitigated. BAE Systems considers that the response provided by the Applicants does not provide a full justification for why the Applicants propose that a Bird Strike Risk Assessment is not necessary.</p> <p>III. Whilst the Applicants may be confident that there would be no OLS or CNS impacts, safeguarding assessments still need to be undertaken in line with the requirements of the Civil Aviation Authority's CAP738.</p> <p>IV. See the above comments on the Applicants' Deadline 1 Covering Letter (Examination Library Ref: REP1-001). There are still significant areas of disagreement between BAE</p>	<p>Civil Licence (regulatory compliance), are safeguarded (for continued aerodrome safe operations).</p> <p>It is understood that the Applicants have the potential to create a temporary change in the environment during the construction of the Transmission Assets, and the Applicants are sympathetic to a request that the Applicants reimburse BAE Systems for the costs of undertaking OLS, IFP and CNSS assessments. The Applicants can confirm that they will reimburse BAE Systems for the costs of undertaking assessments associated with the safeguarding assessments associated with OLS, CNS and IFP.</p> <p>The Applicants will proactively assist in the provision of information / data for BAE Systems to undertake their own assessment and consider that this can be resolved alongside the Examination.</p> <p>II) The Applicants understood that BAE would want to manage and incorporate additional hazards/ bird strike risk caused by the Transmission Assets into their existing Wildlife Hazard Management plan. The Strategy for Wildlife Hazard Management Plan (REP2-047) refers BAE Systems to the CAP 772 guidance which states that: "<i>The aerodrome operator should develop and maintain a systematic method of obtaining information regarding hazardous wildlife species and their habitats to manage them effectively</i>". The Applicants have committed to providing the necessary information to feed into the existing bird strike risk assessment operated by Warton Aerodrome, and have requested a copy of BAE's existing wildlife hazard management to ensure the information provided is appropriate. No information has been received from BAE in response to this request.</p> <p>The Applicants note that Blackpool Airport have initially agreed to this approach and are proactively working with the Applicants in production of the draft outline Wildlife Hazard Management Plan (S_D3_8) submitted at Deadline 3. However, if this is not the position BAE want to</p>



Reference	Written Representation Comment	Applicants' Response
	Systems and the Applicant on the extent of assessment and mitigation that needs to be considered.	<p>take, the Applicants will further discuss the approach to ensure any additional hazards, as a result of the Transmission Assets is agreed by the end of examination.</p> <p>The Applicants' Strategy for Wildlife Hazard Management Plan (REP2-047) and draft outline Wildlife Hazard Management Plan (S_D3_8) submitted at Deadline 3. sets out their approach for providing information to BAE and will be the basis for agreeing the solution moving forward,</p> <p>III) It is noted by the Applicants that the MOD Defence Infrastructure Organisation (DIO) representation REP1-075 X.5 (Technical) stated that after reviewing the plans and documentation provided in the application the MOD has no technical safeguarding objections (OLS or CNS) to the proposed Transmission Assets development.</p> <p>The Applicants are committed to providing the appropriate information to ensure the Transmission Assets do not affect the safe operation and development of BAE Systems Warton Aerodrome in relation to OLS or CNS. The Applicants will proactively assist in the provision of information for the aerodrome's own assessment and consider that this can be resolved alongside the Examination.</p> <p>IV) The Applicants note this comment.</p>
REP2-052 052.12	<p>ISH1_41 BAE Systems to provide an update on process with various matters listed in its closing submission to the Morgan Offshore Wind Project Examination.</p> <p>BAE Systems submitted a response to this Action Point at Deadline 1 (Examination Library Ref: REP1-111). BAE Systems' comments on the Applicants' response to this Action Point will be provided separately by BAE Systems legal advisors, Eversheds Sutherland, at Deadline 2.</p>	The Applicants note this comment.



Reference	Written Representation Comment	Applicants' Response
REP2-052 052.13	<p>Point 112 on page 26 of the Applicant's summary of ISH1 Day 1, makes reference to BAE Systems' request during Day 1 of ISH1 for clarity to be provided over the measurements for the maximum height of the substation buildings and lightning rod.</p> <p>In its summary of Day 1 of ISH1, the Applicant has confirmed that the measurements will be updated in the dDCO at Deadline 2 to maximum metres above finished ground level.</p> <p>As summarised in BAE Systems' summary of its ISH1 oral submissions (Examination Library Document Ref: REP1-110), the dDCO should use a maximum height above AOD, rather than above finished ground level. This is because AOD provides a fixed reference point, which is essential to enable a robust safeguarding assessment to be undertaken.</p>	The Applicants refer BAE Systems to the response to REP2-052 052.9.
REP2-052 052.14	<p>THE APPLICANTS' HEARING SUMMARY OF THE ISSUE SPECIFIC HEARING 1: DAY 2</p> <p>Point 62 on page 14 of the Applicants' summary of Day 2 of ISH1 states the following:</p> <p><i>"..... BAE is responsible for safeguarding their systems [at Warton Aerodrome], therefore any assessment which needs to be undertaken in relation to building heights is the responsibility of BAE in order to demonstrate compliance with its CAA licence. Notwithstanding this, the Applicants confirmed that they are working with BAE in order to provide the information needed for them to undertake the safeguarding assessment. The Applicants noted that the proposed substations are in close proximity to existing pylons which are 42 metres tall; the proposed substations</i></p>	The Applicants note this comment.

Reference	Written Representation Comment	Applicants' Response
	<i>will be a maximum of 30m tall so there is already taller infrastructure in the vicinity."</i>	
REP2-052 052.15	<p>BAE Systems has the following comments to make on the above:</p> <ul style="list-style-type: none"> <li>• BAE Systems confirm that is responsible for undertaking / instructing safeguarding assessments in relation to OLS, IFP and CNS. However, as the Applicants would be the parties making the change in the area that could affect such equipment, BAE Systems require the Applicants to be responsible for the costs of undertaking these safeguarding assessments and any necessary mitigation that may be required.</li> <li>• BAE Systems is not currently in a position to instruct the necessary safeguarding assessments due to information gaps and the absence of any binding commitment on the part of the Applicants with regard to costs recovery. The ExA will be aware from BAE Systems' response to Issue Specific Hearing 1 Action Point 41 (Examination Library Reference REP1-111) that there are a number of unresolved aviation related matters in respect of the offshore generating assets, with very slow progress having been made since the completion of the examination for each of those projects. Constructive dialogue between BAE Systems and the Applicants is critical to ensuring that there isn't a similar outcome to the onshore transmission assets examination.</li> <li>• Whilst BAE Systems acknowledge that there are structures in the area that are taller than the proposed substations and lightning rods, safeguarding assessments are still required under CAP738.</li> </ul>	<ul style="list-style-type: none"> <li>• It is understood that the Applicants are potentially creating a temporary change in the environment during the construction of the Transmission Assets and are sympathetic to a request that the Applicants reimburse BAE Systems for the costs of OLS, IFP and CNSS assessments. The Applicants can confirm that they will reimburse BAE Systems for the costs of undertaking assessments associated with the safeguarding assessments associated with OLS, CNS and IFP.</li> <li>• The Applicants note this comment</li> <li>• The Applicants note this comment. The Applicants are committed to providing the appropriate information to ensure the Transmission Assets do not affect the safe operation and development of BAE Systems Warton Aerodrome in relation to OLS or CNS. The Applicants will proactively assist in the provision of information for the aerodrome's own assessment and consider that this can be resolved alongside the Examination. The Applicants refer BAE Systems to the response to REP2-052 052.11.</li> </ul>

Reference	Written Representation Comment	Applicants' Response
REP2-052 052.16	<p>Point 63 on page 14 of the Applicants' summary of Day 2 of ISH1 states the following:</p> <p><i>"..... engagement with BAE specifically is ongoing in order to agree the strategy for a bird strike mitigation plan. The Applicants emphasised that Warton Aerodrome does have an existing bird strike mitigation plan in place, therefore anything provided to them will be to implement along with their existing mitigation plan – the Applicants maintain that further assessment is not required. There are birds in the area already, and it is not proposed that new or additional birds would be introduced to the area."</i></p>	The Applicants note this comment.
REP2-052 052.17	<p>BAE Systems has previously provided submissions (in its Deadline 1 Written Representations (Examination Library Ref: REP1-112) on the Applicants' position that a Bird Strike Risk Assessment is not required based on the Applicant's belief that the number of birds in the area would not increase. These submissions are that a Bird Strike Risk Assessment is essential for the following reasons:</p> <ul style="list-style-type: none"> <li>• The Applicants have provided no evidence that overall bird numbers in the area will not change. An assumption has been made that because only mitigation habitat is provided, birds will be displaced from one area to another and there would be no increase. BAE Systems is concerned that this is an over-simplification, and an assessment is essential to confirm if this is the case. The assessment should consider whether mitigation and biodiversity benefit sites that are not specifically providing bird habitat could unintentionally attract birds.</li> <li>• It is not just the overall number of birds that gives rise to concerns for BAE Systems. Increases in concentrations of birds in close proximity to Warton Aerodrome and aircraft</li> </ul>	<p>The Applicants' Strategy for Wildlife Hazard Management Plan (REP2-047) and the Outline Wildlife Hazard Management Plan (S_D3_8) sets out the steps that it will follow to agree a workable solution with BAE on bird strike. As part of this, the Applicants have undertaken an initial wildlife attractant risk assessment which describes bird species that may be attracted to the works areas due to increase in potential food sources, standing water and any other factor which may attract birds via submission of the updated outline Ecological Management Plan at Deadline 2 (REP2-018)</p> <p>The Applicants Baseline Bird Note (S_D3_5) and the Outline Wildlife Hazard Management Plan (S_D3_8) submitted at Deadline 3 consider bird numbers and the pattern of use, building upon the information included in the submission of REP2-018. The Applicants recognise that this information will be supplemented and updated following further provision of information from BAE Systems (as referred to in response to REP2-052 052.7).</p> <p>The Applicants will continue to engage with BAE Systems on this workstream. The Applicants note that Blackpool Airport have initially agreed to this approach and are proactively working with the Applicants</p>

Reference	Written Representation Comment	Applicants' Response
	flight paths, particularly areas where aircraft may be operating at lower altitudes, is also of concern to BAE Systems, as are potential changes in bird flight patterns in the area (i.e. if the bird flight patterns could change resulting in more birds flying closer to the Aerodrome or across aircraft flight routes).	in production of the draft outline Wildlife Hazard Management Plan (S_D3_8) submitted at Deadline 3.
REP2-052 052.18	As referred to above, the responsibility for undertaking a Bird Strike Risk Assessment falls to the Applicants, not BAE Systems. Aviation impacts have been identified by the ExA as one of the principal issues for consideration during the Examination. This includes bird strike risk. It is the responsibility of the Applicants to undertake the necessary assessment work and to demonstrate that the proposed development would not give rise to any increased bird strike risk or that any change or worsening of the risk is capable of being appropriately managed and mitigated. The Applicants haven't done so, nor have they provided a reasoned justification for their position.	<p>The Applicants' Strategy for Wildlife Hazard Management (REP2-047) sets out the approach for demonstrating that the Transmission Assets would not give rise to increased bird strike risk, in the event that an increased risk is identified, the outline Wildlife Hazard Management Plan identifies the monitoring and measures that will be adopted to ensure any changes as a result of the Transmission Assets does not increase bird strike risk . The Applicants refer BAE Systems to the response to REP2-052 052.11 regarding the Applicants' approach following the CAA CAP 772 guidance.</p> <p>The Applicants note that Blackpool Airport have initially agreed to this approach and are proactively working with the Applicants in production of the draft outline Wildlife Hazard Management Plan (S_D3_8) submitted at Deadline 3.</p>
REP2-052 052.19	Whilst engagement between BAE Systems and the Applicants is ongoing in relation to aviation impacts, the parties have diametrically opposed positions - the Applicants do not agree with BAE Systems that a Bird Strike Risk Assessment is necessary, and so discussions are at a very early stage and it's not clear what (if any) common ground there might be.	Whilst the Applicants recognise there are outstanding matters to be resolved, the Applicants are committed to continuing its engagement with BAE Systems, with the aim to resolving these matters, as far as reasonably practical (during this examination and beyond) and hopes that common ground can be reached between the parties. The Applicants reiterate that they agree that a bird strike risk assessment is required but, as per CAA CAP 772 guidance, believed this responsibility belongs to the aerodrome operator. The Applicants are committed to work with BAE to ensure that the most practical approach is taken to undertake and manage the assessment, as evidenced by the

Reference	Written Representation Comment	Applicants' Response
		submissions at Deadline 2 and the draft outline Wildlife Hazard Management Plan (S_D3_8) submitted at Deadline 3.
REP2-052 052.20	Point 83 on page 18 of the Applicants' summary of Day 2 of ISH1 states the following: <i>"The Applicants noted that the biodiversity benefit areas are not the same as the mitigation areas that have been noted by ... [Interested Parties] as requiring further consideration for bird strike and clarified that this will be discussed when the Applicants met with BAE / Blackpool Airport."</i>	The Applicants note this comment.
REP2-052 052.21	BAE Systems has been clear in its previous representations that it has concerns over the potential for increased bird strike risk from both the mitigation sites and the biodiversity benefits sites. The Bird Strike Risk Assessment that BAE Systems considers that Applications should undertake, and any proposed mitigation measures, also needs to consider the potential for greater bird strike risk from both the mitigation sites and biodiversity benefit sites.	The Applicants note BAE Systems concerns. The Applicants refer BAE Systems to the response to REP2-052 052.11 regarding the Applicants' approach.
REP2-052 052.22	BAE Systems has also stated in previous submissions that consideration needs to be given to whether the biodiversity benefits should be provided at all if there is the potential that they could result in an increase in bird strike risk. A Bird Strike Risk Assessment is essential to understanding this.	The Applicants note the comment. The Applicants propose to make a voluntary commitment to achieve overall biodiversity benefit for areas of permanent habitat loss in accordance with National Policy Statements EN-1 and EN-5. The proposed measures and their indicative location are shown in the Onshore Biodiversity Benefit Statement (REP2-020). The Applicants consider the proposals are reasonable and proportionate. Please refer to the Applicants' response to REP2-052 052.11 with regard to the wildlife attractant risk assessment.

**Table 2.2: REP2-053 –BAE Systems**

Reference	Written Representation Comment	Applicants' response
REP2-053 053.1	<p>We write with reference to our client's response to the Examining Authority's ("ExA") action points arising from Issue Specific Hearing 1 – specifically, Action Point 41 [see Document Ref. REP1-111].</p> <p>The position with regard to the matters outstanding at the close of the Morgan Offshore Wind Project: Generation Assets [Ref. EN010136] (the "Morgan Project") remain as stated in the above-mentioned response document, save for the following:</p> <ul style="list-style-type: none"> <li>Activities 2 and 4 – the IFP assessment for Walney Aerodrome (by NATS) was delivered to BAE Systems on 21 May 2025 and is in the process of being considered. The IFP assessment for Warton Aerodrome (by Sagentia Aviation; formerly Osprey) is still awaited.</li> </ul>	<p>Morgan Offshore Wind Limited notes BAE's comments. Activity 4 referred to by BAE relates to preparation of an IFP assessment by Sagentia Aviation for an undesigned and unpublished new IFP (a Required Navigation Performance (RNP) approach design). Sagentia Aviation prepared an IFP assessment for all Warton Aerodrome's IPS published in the CAA Integrated Aeronautical Information Package (IAIP), which were submitted as part of the DCO application for Morgan Offshore Wind Project Generation Assets.</p> <p>The outstanding 'Activity 4' IFP assessment for the undersigned / unpublished RNP approach design has been delayed as Sagentia Aviation have been waiting for information from BAE Warton Aerodrome required to complete the IFP assessment. Sagentia Aviation have informed Morgan Offshore Wind Limited that whilst this information is still not available, a way forward has been suggested by BAE to allow for the IFP assessment to be completed. Subject to confirmation from BAE on the suggested way forward, Sagentia Aviation anticipate issuing the amended IFP assessment to BAE System by end July 2025.</p>
REP2-053 053.2	<p>Regarding the Morecambe Offshore Windfarm: Generation Assets [Ref. EN010121] (the "Morecambe Project"), there is no further progress to report – the Applicant and BAE Systems are yet to reach agreement in respect of items (i) [concerning radio (VHF, DF and UHF) communications to aircraft operating from Walney and Warton Aerodromes] and (ii) [concerning the Primary Surveillance Radar ("PSR") at Warton Aerodrome]. Consequently, owing specifically to the absence of an agreement in respect of item (ii), the MOD's objection to the DCO application for the Morecambe Project remains in place.</p>	<p>Morecambe Offshore Windfarm Limited (MOWL), as the Applicant for the Morecambe Offshore Windfarm: Generation Assets DCO, have held regular meetings with BAE Marine (Walney Aerodrome) since the end of the Morecambe Project examination. Meetings have been requested with BAE Systems (Operations) Ltd. (Warton Aerodrome) but it has not been possible to arrange a meeting since the close of the examination; MOWL will continue to engage with both aerodromes and to request meetings with BAE Systems (Operations) Ltd.</p> <p>A VHF, UHF, and DF Technical Safeguarding Assessment was completed for the Morecambe Generation Assets and submitted into the examination (EN010121 REP6-037), this concluded that there would be degradation in signal quality at low altitude but that this reduces as the height above the turbines increases. As a next step both Walney and Warton Aerodrome are required (under CAP670) to undertake operational</p>



Reference	Written Representation Comment	Applicants' response
		<p>assessments to determine if this results in an adverse impact, MOWL understands that these have been completed but the results for either aerodrome have not been shared. The dDCO for the Morecambe Project includes requirements to mitigate any adverse impacts, including to VHF, UHF and DF communication systems, for both Walney and Warton Aerodromes. The wording of these requirements have been agreed with BAE Systems Marine Limited and BAE Systems (Operations) Ltd.</p> <p>The dDCO for the Morecambe Generation Assets includes requirements to submit to and gain approval from the Secretary of State for a radar mitigation scheme for the Warton Aerodrome Primary Surveillance Radar. The wording of this requirement is largely agreed with BAE Systems (Operations) Ltd, with one drafting point not agreed regarding cessation of the operation of the authorised development in the event of a future (post-implementation) failure of the approved radar mitigation scheme. MOWL notes that the same point was also not agreed in relation to the requirements for the Mona Project and the Morgan Generation Assets.</p>
REP2-053 053.3	We would also like to take this opportunity to briefly address the Applicant's commentary in respect of Action Point 41 – see "The Applicants' Response to Hearing Action Points due at Deadline 1" [Document Ref. REP1-037; pages 25 and 26] – in particular, the statements made in respect of the draft DCO Requirements concerning Air Traffic Services ("ATS") at Walney and Warton Aerodromes and the PSR at Warton Aerodrome.	The Applicants note BAE's response and that on Friday 4 July the Secretary of State granted consent for the Mona Offshore Wind Project. The Order made by the SoS included the Applicant's final wording for both the PSR and ATS requirements at Walney and Wharton Aerodrome.
REP2-053 053.4	Dealing first with ATS, the Applicants refer to appropriate Requirements having been secured in the respective draft DCOs for the Morgan and Morecambe Projects. We confirm that the ATS requirement wording which is included in the draft DCO for the Morecambe Project is agreed (see Requirements 6 and 7). However, the ATS requirement wording which was included in the draft DCO submitted at Deadline 7 of the examination for the Morgan	

Reference	Written Representation Comment	Applicants' response
	Project is not consistent with it in a number of important respects (see Requirements 5 and 7). Whilst the differences between the two sets of wording are relatively small in number, they are material in nature. Furthermore, there is the potential for the final mitigation solution/s required to be implemented in respect of the adverse impact on ATS at Walney and Warton Aerodromes to be common across both the Morgan and Morecambe Projects. Accordingly, it is critical that consistency between the draft DCOs is achieved and that the Requirements they secure mirror each other.	
REP2-053 053.5	<p>Regarding the PSR at Warton Aerodrome, draft requirement wording to secure the implementation of an approved radar mitigation scheme is still to be agreed. This is the case for the Morgan and Morecambe Projects, as well as the Mona Offshore Wind Farm Project [Ref. EN010137] (the "Mona Project") which is the subject of two information requests issued by the Secretary of State on 12 and 30 May 2025 (with the target date for the Secretary of State's decision being no later than 16 July 2025). Amongst several other matters, the Secretary of State has queried the status of Requirement 23 – the PSR Requirement – and whether the wording is agreed between the Applicant, DIO and BAE Systems. For the reasons stated above (namely, the potential for the approved mitigation solution/s to be the same across all three Projects) it is imperative that a consistent approach is taken and that identical requirement wording is agreed.</p> <p>The Applicants note that good progress was made prior to the close of the examination for the Morecambe Project (on 23 April 2025) and that the PSR requirement wording was largely agreed at this time – our client concurs. However, the latest submissions of the Applicant for the Mona Project are a significant backward step [see Section</p>	<p>Morgan Offshore Wind Limited considers that matters related to the Mona offshore wind project are not relevant to the consideration or determination of the Joint Transmission application.</p> <p>The Applicants would also note that they have both expressed concerns regarding BAE's suggested requirement wording for the Morgan and Morecambe Generation Assets and are in ongoing engagement with both DIO and BAE either to reach agreement or to clearly set out each party's respective position to the SoS, noting that the Secretary of State has determined this in the Order for the Mona Offshore Wind Project made on 4 July 2025.</p>

Reference	Written Representation Comment	Applicants' response
	<p>1.8 of Document Ref. C1-008b], with the Applicant looking to revisit a number of detailed drafting points which BAE Systems had thought were settled (owing to their inclusion in the latest draft DCOs for the Morgan and Morecambe Projects). Accordingly, an agreement in respect of the PSR requirement wording continues to feel some way off.</p> <p>This is a disappointing turn of events which has taken our client somewhat by surprise, it being raised very late in the day without any prior discussion between the Applicant and BAE Systems, and given that the Morgan and Mona Project Teams are one in the same.</p>	
REP2-053 053.6	<p>BAE Systems will continue to seek agreement of its preferred ATS and PSR requirement wording with the Applicants for the Morgan, Morecambe and Mona Projects (working with DIO as required). In the meantime, we wish to point out, by way of a reminder to the ExA, that the MOD continues to maintain its objection to all three DCO applications.</p>	<p>The Applicants note and welcome BAE's commitment to seeking to work with the Applicants in respect of the wording of the relevant requirements, highlighting the SoS's decision on this matter in the Order made for the Mona Offshore Wind Project.</p>

## 2.2 Canal & River Trust

**Table 2.3: REP2-055 – Canal & River Trust**

Reference	Written Representation Comment	Applicants' response
REP2-055 055.1	<p><b>Canal &amp; River Trust (the Trust) Submission for Deadline Two, (Unique Reference: 20053937).</b></p> <p>We write further to the publication of the Deadline One (DL1) submissions.</p> <p>We wish to provide the ExA with an update on the Trust's latest position in relation to the examination, with headings to identify the various elements in relation to Deadline Two (DL2), including update on the proposed Protective Provisions for the benefit of the Trust, and on progress made on negotiating an agreement in terms of the rights over Trust leased land. We also provide comments on Deadline 1 matters relevant to the Trust.</p>	<p>The Applicants thank the Canal and River Trust (the Trust) for their written submissions and have responded below.</p>
REP2-055 055.2	<p><u>Protective Provisions for the Trust</u></p> <p>As part of their DL1 submissions, the applicant has provided an updated Draft Development Consent Order (Ref C1/F03 dated 20th May 2025). We welcome that this updated draft now includes a version of protective provisions for the Canal &amp; River Trust (Part 11, Schedule 10). But, please note, as set out in our DL1 response these only reflect the progress of negotiations to date, they have not been agreed by the Trust.</p> <p>We provided at DL1 our preferred protective provisions which are based on the DCO made for Keadby 3 (SI 2022/1396) and similar which have been recently included in the Cottam (SI 2024/943) &amp; Gate Burton (SI 2024/807) Solar NSIPs, where the proposed developments affecting the Trust's asset is an underground electricity cable.</p>	<p>The Applicants confirm that the draft Development Consent Order (REP2-004) was updated at Deadline 1 to contain protective provisions for the protection of the Trust and acknowledged in the Land Rights Tracker at Deadline 1 (REP1-065) that these were not in agreed form with the Trust.</p> <p>The Applicants provided an updated set of protective provisions to the Trust for consideration on 12 June, with limited points of discussion remaining. The Trust returned comments on the 19 June and 3 July, which the Applicants are reviewing. The Applicants have provided an update in the SU Negotiations Progress Tracker (S_D3_10) at Deadline 3 which contains a joint statement with the Applicants and the Trust as to the positive progress being made with these protective provisions.</p>

Reference	Written Representation Comment	Applicants' response
	The Trust are currently awaiting further comments from the applicant on the latest draft protective provisions sent to the applicant on 16th May.	
REP2-055 055.3	<u>Statement of Common Ground</u> We note that the applicant's DL1 submission Statement of Commonality (Ref: S_D1_6 Rev F01 dated 20th May 2025), in relation to a SoCG with the Trust and that a SoCG is not required "on the basis of engagement will focus on negotiation of the Protective Provisions and associated side agreement where necessary." We would concur with this approach.	The Applicants thank the Trust for this response.
REP2-055 055.4	<u>Trusts' response to Deadline One matters</u> The Trust have read the various relevant DL1 submissions of the applicant which relate to the Trust's interests and in particular the Land Rights Tracker (Ref: S_D1_15 Rev F01 dated 20th May 2025). Page 32 of that document relates to the Trust and provides a summary of the negotiation status to date with which we concur.  The applicant's land agents (Dalcour Maclaren) provided the Trust draft Heads of Terms for the land where we have leasehold interests on 19th May 2025. The Trust replied to this email on 29th May 2025 advising that we will be appointing an external agent to assist us with negotiations and will provide details of the appointed person in due course.  The Trust has no further comments to make on the applicant's other DL1 Submissions  The Trust will update the ExA on the progress made in relation to the protective provisions and other matters at each relevant deadline.	The Applicants note the response and confirm the Applicants' intentions to continue to engage with the Trust on the land rights sought. The Applicants held a meeting with the appointed agent on 24 June to progress negotiations on the voluntary agreement. The latest position on the negotiations can be found in the Land Rights Tracker submitted at Deadline 3 (S_D1_15/F02).

Reference	Written Representation Comment	Applicants' response
	Please do not hesitate to contact me with any queries you may have.	



## 2.3 Environment Agency

**Table 2.4: REP2-056 –Environment Agency**

Reference	Written Representation Comment	Applicants' Response
REP2-056 056.1	<p>DEADLINE 2 – COMMENTS ON SUBMISSIONS RECEIVED BY DEADLINE 1.</p> <p>We have reviewed relevant submissions received by Deadline 1 and would like to make the following comments:</p> <p>[REP1-025, REP1-026, REP1-027] F3.2.3 Volume 3, Annex 2.3: Flood risk assessment - Part 1, Part 2, Part 3 RevF03</p> <p>We are in the process of reviewing the updated Flood Risk Assessment and will provide a response as soon as possible and before the next Deadline.</p>	The Applicants note this comment.
REP2-056 056.2	<p>[REP1-029] F3.3.9 Volume 3, Annex 3.9: Water vole survey technical report (Tracked) - Rev F02</p> <p>This report provides results from the second, late-season, survey. We are satisfied with the conclusions of this report, that there are no changes to the conclusions from the first baseline survey.</p>	The Applicants acknowledge that the Environment Agency are satisfied with the conclusions of Volume 3, Annex 3.9: Water vole survey technical report (REP1-028).
REP2-056 056.3	<p>[REP1-051] S_D1_6.6 Environment Agency Statement of Common Ground - Rev F01</p> <p>We agree with the Statement of Common Ground</p>	The Applicants acknowledge that the Environment Agency agree with the Statement of Common Ground (REP1-051).
REP2-056 056.4	<p>Environment Agency position Our current position regarding the points raised in our Relevant Representation [RR-0677], and subsequently followed up in our Written Representation [REP1-076] is set out below.</p>	The Applicants note this comment and respond in the following rows.

Reference	Written Representation Comment	Applicants' Response
REP2-056 056.5	<u>Ecology</u> • Mitigation for otters - On-going discussion. This will be covered under the Ecological Management Plan, Requirement 12, for which the EA requests to be added as consultee.	The Applicants confirm that the Environment Agency is included as a consultee in Requirement 12 of the updated draft DCO (REP2-004) submitted at Deadline 2.
	• Habitat creation and improvement proposals at Lea Marsh Fields and Dow Brook: Habitat creation for otter - Ongoing discussion. This will be detailed in the Biosecurity Benefit Statement for which the EA requests to be added as consultee.	The Applicants refer the Environment Agency to their submission REP1-076.5, where the Environment Agency confirmed they are satisfied that they will be consulted on the detailed Biosecurity Protocol under Requirement 8 of the draft DCO (REP2-004). To provide further clarification, should the EA's comment be referring to the Onshore Biodiversity Benefit Statement (REP2-020), the Applicants would note this concerns the voluntary commitments made by the Applicants for habitat creation. The purpose of this statement is an assessment of the overall benefit to onshore biodiversity associated with the project and is therefore not directly consulted on. The Environment Agency is however, ultimately consulted on these matters via the detailed Ecological Management Plans, which is secured under Requirement 12 of the draft DCO (REP2-004). The Applicants further note that the RAG status concerning the biodiversity benefit statement has been updated to agreed within Table 1.5 in the Environment Agency's Statement of Common Ground (REP1-051).
REP2-056 056.6	<u>Flood Risk</u> EA requests early involvement in detailed project design	The Applicant notes this response and in line with discussions with the Environment Agency, have provided an updated set of Protective Provisions to reflect the requirement for a bespoke disapplication of FRAPS

Reference	Written Representation Comment	Applicants' Response
	This matter is on-going. To ensure there is adequate consultation through the use of Protective Provisions and the disapplication of FRAPS.	application. This was sent to the Environment Agency on 01 July 2025.
REP2-056 056.7	<p><u>Geology</u></p> <ul style="list-style-type: none"> <li>Hydrogeological Risk Assessment required.</li> <li>Foundation Works Risk Assessment required.</li> </ul> <p>This matter is on-going.</p> <ul style="list-style-type: none"> <li>Hydrogeological risk assessment (HyRA) for all HDD or any other trenchless utility installation methods is proposed to be secured through Requirement 8. We are satisfied with this approach, but for clarity, a hydrogeological risk assessment must be listed under sub-paragraph (2) of Requirement 8 of the dDCO [APP-005]. An outline Hydrogeological risk assessment should be provided in support of the Outline CoCP [APP-193]</li> </ul> <p>The EA has requested a plan to show the maximum design scenarios for the dewatering and Transition joint bays to show location of the entry pits, the depth of dewatering and the period over which the dewatering would take place.</p> <ul style="list-style-type: none"> <li>A Foundation Works Risk Assessment is proposed to be secured through Requirement 8. We are satisfied with this approach, but for clarity, a Foundation Works risk assessment must be listed under sub-paragraph (2) of Requirement 8 of the dDCO [APP-005].</li> </ul>	<p>The Applicants confirm that the Environment Agency's request for Requirement 8(2) to include the hydrogeological risk assessment was updated at Deadline 2 – see the draft DCO (REP2-004). In support of this, a definition for outline hydrogeological risk assessment was also added to the draft DCO (REP2-004). Please refer to the Applicants' response to the Environment Agency's written representation at 677.4 (REP2-031) which confirms the Applicants will be submitting an outline hydrogeological risk assessment for the trenchless cable installation beneath Lytham St Annes SSSI at Deadline 3. The outline hydrogeological risk assessment has now been submitted at Deadline 3 (S_D3_6).</p> <p>The Applicants held a meeting with the Environmental Agency on 16 June 2025 to share and discuss the outcome of outline hydrogeological risk assessment in advance of submission at Deadline 3.</p> <p>With regards to the Foundation Works Risk Assessment, the Applicants would clarify that this has not been agreed between the Applicants and the EA. The Applicants have made a commitment (CoT103 of Volume 1, Annex 5.3: Commitments Register (REP2-010 Moto produce detailed piling risk assessment(s) post-consent, where suspected contamination is present and piling is proposed. The need to prepare these assessments at specific locations will be</p>

Reference	Written Representation Comment	Applicants' Response
		confirmed during detailed design in consultation with the Environment Agency.
REP2-056 056.8	<p>Amended timescales EA requires 21 days to review consultations on matters specified in requirements.</p> <p>This matter is on-going. We are not satisfied with the suggested wording 'or a longer period is agreed with both the undertaker and the discharging authority'. We maintain our position that the Environment Agency requires 21 days to review consultations on matters specified in requirements.</p>	The Applicants have updated Schedule 12, para 5(1) to refer to '21 days' instead of '10 days'. This is included in the draft DCO (C1/05) submitted at Deadline 3.
REP2-056 056.9	<p>Protective Provisions</p> <p>This matter is on-going. We are in on-going discussion regarding the final form of the protective provisions.</p>	The Applicants acknowledge that discussions are on-going with respect to the protective provisions. The Applicants have provided an update on the progress of protective provisions in the Applicants' Statutory Undertaker Negotiations Tracker (S_D3_10) at Deadline 3.
REP2-056 056.10	<p><u>Onshore Biodiversity Benefit Statement</u></p> <p>Section 1.5.2.8 &amp; 1.5.3.13: The EA support any plans to improve the condition of Dow Brook and the habitat creation at Lea Marsh Fields, particularly the creation of ditches. We request that we are consulted on any such proposals and Landscape Management Plan as they are developed through consultation under amended Requirement 6.</p> <p>This matter is on-going. Section 1.5.1.3 of the Biodiversity Benefit Statement [APP-216] states that the habitat creation and enhancement proposals remain indicative at this stage in the DCO application process, and will be based on detailed landscaping designs for the onshore substations and biodiversity benefit area at Lea Marsh Fields. We wish to</p>	Please refer to the Applicants' response at 056.5 above. With regards to being consulted under Requirement 6, the Applicants note they have previously discussed with the EA on this point at 677.5 of PDA-010 where they confirmed they do not consider it necessary to amend the Requirement 6 to include the Environment Agency as consultee as landscape mitigation planting within the onshore substations will be set back a minimum of 8 m from Dow Brook.

Reference	Written Representation Comment	Applicants' Response
	secure consultation on these landscaping designs, specifically where they are relevant to watercourse enhancement and creation as detailed in paras 1.5.2.8 (Dow Brook) and 1.5.3.13 (Lea Marsh Fields) of the Biodiversity Benefit Statement [APP-216].	
REP2-056 056.11	<p><u>Outline Dust Management Plan</u></p> <p>1.4.5.1 Dust suppression:</p> <p>This matter is ongoing. We maintain our position that para 1.4.5.1 of the outline Dust Management Plan [APP-195] should highlight that if water is obtained by local extraction, then this may require an abstraction licence. This potential need for a licence will then be identified in the detailed Dust Management Plan(s). Failure to recognise the need for an abstraction licence could result in subsequent unnecessary delays to site construction activities.</p>	The Applicants refer the EA to the response to 076.20 in Deadline 2 Submission - Applicants' Response to Written Representations from Statutory Consultees and other Organisations (REP2-031).
REP2-056 056.12	<p><u>Hydrology and flood risk</u></p> <p>Page 48 Row 3 column 4: minimum vertical clearances: We recognise that CoT10 is a commitment to maintaining a minimum 2m vertical clearance below all main rivers, secured in Requirement 8, and through Protective Provisions Schedule 10 Part 9. We are currently in discussion with the applicant to ensure that the Protective Provisions are applicable to all potential works areas where the Environment Agency would need to be consulted at the detailed design stage.</p> <p>2.6.10.11 Page 77: flood risk impacts from temporary works: We await confirmation that there will be no flood risk effects from temporary construction works in the maximum design scenario.</p>	<p><b>Page 48 Row 3 column 4</b></p> <p>See the response to REP2-056.9 above.</p> <p><b>2.6.10.11 Page 77</b></p> <p>The Applicants refer the EA to the response to 076.22 in Deadline 2 Submission - Applicants' Response to Written Representations from Statutory Consultees and other Organisations (REP2-031). This refers to Section 1.3 of the Clarification Note: Construction Scenarios (REP1-060) submitted at Deadline 1 which notes that the change to the end date of construction following the review of the maximum design scenario does not change the conclusions set out within the revised Flood Risk Assessment (REP1-022, REP1-023 and REP1-024).</p>

Reference	Written Representation Comment	Applicants' Response
REP2-056 056.13	<p><u>Soil Management Plan</u></p> <p>Further discussion required. The EA's concern is specifically regarding the potential for temporary soil storage to divert or obstruct the movement of flood waters. This concern does not appear to be addressed in the Outline Soil Management Plan [APP-200] and associated best practice guidance.</p>	<p>The Applicants refer the EA to the response to REP1-076.25 in Deadline 2 Submission - Applicants' Response to Written Representations from Statutory Consultees and other Organisations (REP2-031).</p>



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## 2.4 Fylde Borough Council

The Applicants' response to Fylde Borough Council submission at Deadline 2 (REP2-057) is provided in Annex 2.1 to Applicants' Response to IP submissions: Fylde Borough Council (Document Reference: S\_D3\_2.1).

## 2.5 Lancashire Association of Local Councils Fylde Area Committee Energy Working Group

**Table 2.5: REP2-059 –Lancashire Association of Local Councils Fylde Area Committee Energy Working Group**

Reference	Written Representation Comment	Applicants' response
REP2-059 059.1	<p>Lancashire Association of Local Councils Fylde Area Committee Energy Working Group (EWG) wishes to thank the Examining Authority for providing the author of REP1-117 the opportunity to be able to share their report of a reply to a Freedom of Information Request from National Grid Electricity Transmission (NGET) PLC. The EWG also wishes to thank the author of REP1-117 for securing the response from NGET PLC regarding how they elected to describe their view of the Stanah and Penwortham substations as they perceived the Morgan and Morecambe wind farm projects.</p> <p>In the material of REP1-117 attributed to NGET PLC, it would appear that NGET was unable or unwilling to show any complete and consistent comparative assessment against relevant criteria.</p>	<p>Whilst the Lancashire Association of Local Councils Fylde Area Committee Energy Working Group relates to commentary on REP1-117, the Applicants' consider that they have responded to all matters raised in Applicants' response to Hearing Action Points: ISH1 6, 8, 9, 19, 26 &amp; 28 - Rev F01 (REP1-039) and Annex 3.1 to Applicants' Response to WRs from Statutory Consultees: Lancashire Association of Local Councils Fylde Area Committee Energy Working Group (REP2-032).</p> <p>In relation to costs and the hypothetical "Northern Route" via Stanah and Hillhouse, the Applicants' refer to their response to REP2-064 – Newton with Clifton and Freckleton Parish Councils, submitted at Deadline 3 (REP2-035).</p>
REP2-059 059.2	<p>Such criteria would be expected to consistently consider the whole generation and transmission system for each of the independent Morecambe and Morgan wind farm projects taking account of both the Applicants' and NGET PLC's sub-systems with regard to :</p> <ul style="list-style-type: none"> <li>a) Efficiency and Economy as required by the Electricity Act 1989; and</li> <li>b) the criteria set out in the Offshore Transmission Network Review (OTNR) of <ul style="list-style-type: none"> <li>i) Cost to consumers</li> <li>ii) Deliverability and operability</li> <li>iii) Impact on the environment</li> <li>iv) Impact on local communities</li> </ul> </li> </ul> <p>That the Holistic Network Design Review claimed it followed, but did not present in the HNDR report;</p>	

Reference	Written Representation Comment	Applicants' response
	<p>c) or even the criteria NGET PLC stated in the Fol response reported in REP1-117, but then omitted to use in its reply:</p> <ul style="list-style-type: none"> <li>i) location</li> <li>ii) project requirements</li> <li>iii) network resilience</li> <li>iv) cost</li> <li>v) environment and</li> <li>vi) the capacity of our existing infrastructure</li> </ul>	
REP2-059 059.3	<p>None of these criteria were shown to have been applied consistently, nor completely in a comparative assessment of NGET PLC's Stanah and Penwortham substations for linking the independent Morgan &amp; Morecambe offshore generation assets with Penwortham and beyond to the consumer.</p> <p>In addition and critically, NGET PLC's statements in REP1-O89 concerning: the conflicts that NGET PLC continues to have with the Applicants' proposals; and the extensive upgrades and extensions required at the Penwortham site located within designated Green Belt to enable the existing infrastructure to be capable of connecting the Morgan and Morecambe wind farm and other projects, evidences the inadequacy of NGET PLC's reported assessment provided in REP1-117.</p>	
REP2-059 059.4	<p>By contrast, Stanah, similarly connected to the high voltage national grid network, already connects the Walney2 offshore wind farm to that network. It has direct access to extensive land designated to support energy related development in the adjacent 138 hectare Hillhouse Technology Enterprise Zone (HTEZ) site. This evidently offers a more Efficient and Economic connection point to link with Penwortham and beyond to consumers, with already demonstrated deliverability and operability.</p> <p>By the utilisation of the established infrastructure including NGET PLC's 400kV twin circuit overhead line (reference : VF 400kV OHL Heysham-</p>	

Reference	Written Representation Comment	Applicants' response
	<p>Penwortham-Stanah1 Heysham-Penwortham-Stanah 2 in REP1-117), the Morecambe and Morgan projects would avoid the increased time, risk and costs of creating two independent sets of 30km of undergrounded cabling to link the Irish Sea shore on the Fylde coastal plain with Penwortham in the West Lancashire plain. Using the costings in the latest "Comparison of Electricity Transmission Technologies: Costs and Characteristics - An independent report by Mott MacDonald in conjunction with the IET Institute of Engineering and Technology" issued in 2025 <b>REDACTED</b>), adoption of this approach would suggest savings of some £904,000,000 by this adoption of the approach of utilisation of established energy infrastructure.</p>	
REP2-059 059.5	<p>Stanah/HTEZ includes network resilience options of: substation expansion space; local power consumption by energy intensive sectors attracted to HTEZ reducing network capacity requirements; hydrogen based energy balancing infrastructure proposals; and multiple high voltage circuit route growth.</p> <p>Stanah offers a location immediately adjacent to the 138 hectare HTEZ site, nationally approved for energy developments, with its already provisioned utilities and highways access facilities. This facilitates both any expansion for NGET PLC network infrastructure requirements, as well as hosting both Morgan and Morecambe onshore substations, independently. This is compliant with the National and Local Development Framework, removing unacceptable environmental and community impacts. By contrast the Applicants' non-compliant proposals have to chosen to propose development of substations on community critical Green Belt land and conflicts with maritime and land environmental protection zones.</p>	
REP2-059 059.6	<p>In addition, via HTEZ, Stanah's location gains access to the Irish Sea across only 2km of open space, offering multiple environmental and community compliant construction options. This avoids the order of</p>	

Reference	Written Representation Comment	Applicants' response
	<p>magnitude greater construction works required to link Penwortham with the Irish Sea with the Applicants' proposals involving 60km of two independent undergrounded cable route sets and separated substations to be located by choice on community critical Green Belt.</p> <p>Stanah/HTEZ delivers a faster, cheaper lower risk solution to linking transmission assets from the Irish Sea to Penwortham, delivering Morgan and Morecambe project requirements in an enhanced manner, delivering the lowest cost to the consumer in comparison to the Applicants' proposals.</p>	
<p>REP2-059 059.7</p>	<p>By complete and consistent assessment against all the criteria, Stanah/HTEZ as the link to Penwortham and beyond to the consumer, offers fully compliant, superior economy and efficiency, to deliver the lowest cost to consumers in comparison with the Applicants' non-compliant current proposals. For Ease of Reference REP1-117 is reproduced below, followed by a point by point assessment : Link to REP1-117 : <a href="#">EN020032-001019-Brian Harrop - Written rep.pdf</a></p> <p>Submission ID: 36153</p> <p>Connection to the National Grid. During the preliminary hearings the Applicants stated they had no choice in deciding upon Penwortham as the connection point. This seemed an area of contention with legal representatives of Parish councils (and a query from the Chair). There seemed to be issues with the Grid's use of the words "preferred" route and that the Applicants "substantially" had no decision. I raised this issue with the National Grid back in December - via a Freedom of Information request - and received the reply below. It seems to me that the Applicants are correct in that the Grid has the responsibility to decide on the connection point. "Thank you for your message. As part of our legal obligation to facilitate new connections to the network, it is our responsibility to identify the most suitable connection point based on factors such as location, project requirements, network resilience, cost,</p>	

Reference	Written Representation Comment		Applicants' response									
	environment and the capacity of our existing infrastructure. Penwortham and Stanah substations have different roles within our electricity network and for Morgan and Morecambe's proposed projects, Stanah is currently not best placed to accommodate these connections. Stanah is a small substation that has primarily been designed to step down the power from higher voltage transmission lines to lower voltage lines, so that it is ready to be distributed to consumers. Penwortham is much larger in comparison and is part of our high-voltage transmission network, which is able to connect power generation sources, such as wind farms, to the network. Unlike Stanah, Penwortham substation currently has the flexibility and capacity on-site to facilitate Morgan and Morecambe's connection requests."											
REP2-059 059.8	<table><tr><td colspan="3">Table Part 1:</td></tr><tr><td></td><td><b>Text from relevant representation of the Author of REP1-117 (Bold Text below applied to highlight particular features)</b></td><td><b>LALC FAC EWG Notes on report of NGET PLC's Freedom of Information request reply in REP1-117</b></td></tr><tr><td>1</td><td>Submission ID: 36153 Connection to the National Grid.</td><td></td></tr></table>		Table Part 1:				<b>Text from relevant representation of the Author of REP1-117 (Bold Text below applied to highlight particular features)</b>	<b>LALC FAC EWG Notes on report of NGET PLC's Freedom of Information request reply in REP1-117</b>	1	Submission ID: 36153 Connection to the National Grid.		The Applicant's note the LALCEWG's comments but consider that it is unreasonable to draw from the language NGET used the very extensive conclusions that the LALCEWG do.
Table Part 1:												
	<b>Text from relevant representation of the Author of REP1-117 (Bold Text below applied to highlight particular features)</b>	<b>LALC FAC EWG Notes on report of NGET PLC's Freedom of Information request reply in REP1-117</b>										
1	Submission ID: 36153 Connection to the National Grid.											



Reference	Written Representation Comment		Applicants' response
REP2-059	2	During the preliminary hearings the Applicants stated they had no choice in deciding upon Penwortham as the connection point. This seemed an area of contention with legal representatives of Parish councils (and a query from the Chair). There seemed to be issues with the Grid's use of the words "preferred" route and that the Applicants "substantially" had no decision. I raised this issue with the National Grid back in December - via a Freedom of Information request - and received the reply below. It seems to me that the Applicants are correct in that the Grid has the responsibility to decide on the connection point.	
	3	"Thank you for your message.	
	Table Part 2:		

Reference	Written Representation Comment		Applicants' response
059.9		<p><b>Text from relevant representation of the Author of REP1-117</b></p> <p><b>(Bold Text</b> below applied to highlight particular features)</p>	
	4	<p><b>As part of our</b> legal obligation to facilitate new connections to the network, it is our responsibility to identify the most suitable connection point based on factors <b>such as location, project requirements, network resilience, cost, environment and the capacity of our existing infrastructure.</b></p>	<p>It is of note that there is no explicit reference to National Grid Electricity Transmission (NGET) PLC's Electricity Act 1989 obligations for economy and efficiency; or to the Offshore Transmission Network Review (OTNR) criteria that were supposed to have been used in Holistic Network Design Review (HNDR) of cost/deliverability/environmental impact/community impact, or showing the evidence of any comparison between the connection points considered.</p> <p>In the Freedom of Information request (FoI) response by NGET PLC as reported by the author of REP1-117, the terms : <b>location, project requirements, network resilience, cost, environment and the capacity of our existing infrastructure</b> are stated as factors, but then are not objectively or consistently referred to in any comparison between Penwortham and Stanah in the context of connecting either or both of the Morgan or Morecambe generating assets to the consumer.</p> <p>Instead the FoI answer seems to be essentially about the size and flexibility of Penwortham in comparison to Stanah. Given NGET's comments</p>

Reference	Written Representation Comment	Applicants' response
	<p>about Morgan's and Morecambe's Applicants' proposals, this doesn't seem to stand up to any professional scrutiny and definitely not when compared to Stanah's direct access to the 138 hectare Hillhouse Technology Enterprise Zone (HTEZ) site.</p> <p>It is noted that in National Grid Electricity Transmission (NGET) PLC's Written Representation Rep1-O89, even 3 years after the publication of the HNDR Report, NGET would appear to have an extensive description of enduring concerns regarding the cost, deliverability, environmental and community impact that the Applicants' proposals have on NGET's existing and anticipated assets at and around their Penwortham substation, including potentially involving compulsory acquisition of additional land. The HNDR report text is silent about any reference to Stanah. Yet Stanah is the closet and most accessible connection point to the Irish Sea on the Fylde Coastal Plain.</p> <p>This would suggest that the HNDR assessment is – at best – out of date e.g. that there have been further emergent projects impacting access to the site subsequent to the HNDR; and/or perhaps that the HNDR did not fully consider the appropriate level of detail before NESO/NGESO recommending Penwortham as a connection point. This follows the Applicants' submission to NESO of a proposal that would share a single substation site, landfall and cable corridors. The DCO submission however involves separated substation location, landfall and cabling schedules with the commensurate adverse</p>	

Reference	Written Representation Comment		Applicants' response
		<p>intensification &amp; duration of impacts and cost increases. NGET PLC Representation is silent on ensuring the lowest cost to the consumer, reflecting its focus on NGET related impacts rather than taking a system view for economy and efficiency as indicated by the Electricity Act 1989 and Energy Act 2023.</p> <p>This can only be further conflicted by the emergence of the Mooir Vannin NSIP project, which claims to be connecting with the national grid network to provide power between 2023. and 2033 according to the developer Orsted's East Irish Sea Transmission Project website link <a href="https://eastirishseatransmissionproject.co.uk/faqs">https://eastirishseatransmissionproject.co.uk/faqs</a>.</p>	
REP2-059 059.10	<b>Table Part 3:</b>		

Reference	Written Representation Comment		Applicants' response
	<p><b>Text from relevant representation of the Author of REP1-117</b> (<b>Bold Text</b> below applied to highlight particular features)</p>	<p><b>LALC FAC EWG Notes on report of NGET PLC's Freedom of Information request reply in REP1-117</b></p>	
	<p>5 Penwortham and Stanah substations have different roles within our electricity network and for Morgan and Morecambe's proposed projects, Stanah is <b>currently</b> not best placed to accommodate these connections.</p>	<p>It is noted that the reply uses “currently” in respect of the attractiveness of Stanah. Stanah already connects the Walney2 Offshore Wind Farm to the national grid network and on to consumers. It has done so since 2012. It's plant and equipment is presumably economically and efficiently sized for the historical demand.</p> <p>In addition Walney 2's onshore converter substation is hosted on the 138 hectare Hillhouse Technology Enterprise Zone (HTEZ). This demonstrates the feasibility and availability of land for hosting energy infrastructure, a key purpose in the national approval of its status as an Enterprise Zone. The NGET Stanah functionality could therefore logically be expanded onto the HTEZ site.</p> <p>It is observed that the principal owner of the HTEZ site, NPL, has invited the Examination Authority to visit the site to evidence its suitability (REP1-187)</p> <p>By way of comparison, it would appear that “currently” Penwortham is not best placed to accommodate these connections. In the afore mentioned NGET Representation, there is an</p>	

Reference	Written Representation Comment		Applicants' response
		<p>extensive description of the multiple significant enduring conflicts with the Applicants' proposals regarding Penwortham's suitability to accept connections for the Morgan and Morecambe wind farm projects. There seem to be multiple issues regarding conflicts with NGET assets, and Penwortham requires additional plant and equipment to accommodate the increased capacity and functionality required in connecting with these projects. This will presumably be further exacerbated by consideration of how the Moor Vannin project should that be connected at Penwortham.</p>	
REP2-059 059.11	<b>Table Part 4:</b>		



Reference	Written Representation Comment		Applicants' response
	<p><b>Text from relevant representation of the Author of REP1-117</b> (<b>Bold Text</b> below applied to highlight particular features)</p>	<p><b>LALC FAC EWG Notes on report of NGET PLC's Freedom of Information request reply in REP1-117</b></p>	
	<p>6 Stanah is a small substation that has <b>primarily</b> been designed to step down the power from higher voltage transmission lines to lower voltage lines, so that it is ready to be distributed to consumers.</p>	<p>It is noted that the NGET PLC's reply uses "primarily" in respect of the attractiveness of Stanah.</p> <p>As highlighted above Stanah also performs the core function of connecting the Walney2 Offshore wind farm stepping the voltage up to the 400kV national grid network and distributed to consumers.</p> <p>Stanah has been the subject of being on the preferred shortlisted connection point for multiple offshore generation and transmission projects to be landed on the Fylde coastline e.g.</p> <ul style="list-style-type: none"> <li>• UK Offshore Energy Strategic Environment Assessment (SEA)</li> <li>• North West Coast Connection (NWCC)</li> <li>• Celtic Array</li> <li>• Walney Extension Offshore Wind Farm</li> <li>• Walney 2 Offshore Wind Farm</li> <li>• Isle of Man – England Inter-connector</li> </ul> <p>Stanah has been the connection point for the Walney 2 Offshore Wind Farm since 2012.</p> <p>Stanah has adjacent space to expand at the HTEZ.</p>	

Reference	Written Representation Comment		Applicants' response						
REP2-059 059.12	<table><tr><td colspan="2"><b>Table Part 5:</b></td></tr><tr><td><b>Text from relevant representation of the Author of REP1-117</b>  (<b>Bold Text</b> below applied to highlight particular features)</td><td><b>LALC FAC EWG Notes on report of NGET PLC's Freedom of Information request reply in REP1-117</b></td></tr><tr><td>7 Penwortham is much larger in comparison and is part of our high-voltage transmission network, which is able to connect power generation sources, such as wind farms, to the network.</td><td>As detailed in NGET PLC's Written Representation Rep1-O89 Penwortham requires extensive upgrades to meet further power generation connections including the Morgan and Morecambe wind farms to the network. The nature, scale, complexity and interactions associated with the yet further connection upgrades expected for the NSIP Mooir Vannin East Irish Sea Transmission Project are not referenced in Rep1-O89.  Stanah is already part of high voltage transmission network. Rep1-O89 refers to the overhead line dual circuit direct connections between Penwortham, Stanah, Heysham and beyond at section 2.1 (g) "VF 400kV OHL Heysham- Penwortham-Stanah1 Heysham-Penwortham-Stanah 2". In section 2.1(f) potential supplementary linkage infrastructure between Penwortham and Stanah is provided via ywin circuit 400kV overhead line "ZQ 400kV OHL Heysham- Hutton=Penwortham 1 Heysham-Hutton-Penwortham 2".</td></tr></table>		<b>Table Part 5:</b>		<b>Text from relevant representation of the Author of REP1-117</b>  ( <b>Bold Text</b> below applied to highlight particular features)	<b>LALC FAC EWG Notes on report of NGET PLC's Freedom of Information request reply in REP1-117</b>	7 Penwortham is much larger in comparison and is part of our high-voltage transmission network, which is able to connect power generation sources, such as wind farms, to the network.	As detailed in NGET PLC's Written Representation Rep1-O89 Penwortham requires extensive upgrades to meet further power generation connections including the Morgan and Morecambe wind farms to the network. The nature, scale, complexity and interactions associated with the yet further connection upgrades expected for the NSIP Mooir Vannin East Irish Sea Transmission Project are not referenced in Rep1-O89.  Stanah is already part of high voltage transmission network. Rep1-O89 refers to the overhead line dual circuit direct connections between Penwortham, Stanah, Heysham and beyond at section 2.1 (g) "VF 400kV OHL Heysham- Penwortham-Stanah1 Heysham-Penwortham-Stanah 2". In section 2.1(f) potential supplementary linkage infrastructure between Penwortham and Stanah is provided via ywin circuit 400kV overhead line "ZQ 400kV OHL Heysham- Hutton=Penwortham 1 Heysham-Hutton-Penwortham 2".	
<b>Table Part 5:</b>									
<b>Text from relevant representation of the Author of REP1-117</b>  ( <b>Bold Text</b> below applied to highlight particular features)	<b>LALC FAC EWG Notes on report of NGET PLC's Freedom of Information request reply in REP1-117</b>								
7 Penwortham is much larger in comparison and is part of our high-voltage transmission network, which is able to connect power generation sources, such as wind farms, to the network.	As detailed in NGET PLC's Written Representation Rep1-O89 Penwortham requires extensive upgrades to meet further power generation connections including the Morgan and Morecambe wind farms to the network. The nature, scale, complexity and interactions associated with the yet further connection upgrades expected for the NSIP Mooir Vannin East Irish Sea Transmission Project are not referenced in Rep1-O89.  Stanah is already part of high voltage transmission network. Rep1-O89 refers to the overhead line dual circuit direct connections between Penwortham, Stanah, Heysham and beyond at section 2.1 (g) "VF 400kV OHL Heysham- Penwortham-Stanah1 Heysham-Penwortham-Stanah 2". In section 2.1(f) potential supplementary linkage infrastructure between Penwortham and Stanah is provided via ywin circuit 400kV overhead line "ZQ 400kV OHL Heysham- Hutton=Penwortham 1 Heysham-Hutton-Penwortham 2".								

Reference	Written Representation Comment		Applicants' response						
	<table><tr><td></td><td></td><td><p>Stanah has been the subject of being on the preferred shortlisted connection point for multiple offshore generation and transmission projects Fylde coastline in preference to Penwortham. Examples of this are listed above.</p><p>Stanah has access to expand on immediately adjacent space on the nationally approved 138hectare HTEZ site, specifically designated to support energy projects.</p></td></tr></table>			<p>Stanah has been the subject of being on the preferred shortlisted connection point for multiple offshore generation and transmission projects Fylde coastline in preference to Penwortham. Examples of this are listed above.</p> <p>Stanah has access to expand on immediately adjacent space on the nationally approved 138hectare HTEZ site, specifically designated to support energy projects.</p>					
		<p>Stanah has been the subject of being on the preferred shortlisted connection point for multiple offshore generation and transmission projects Fylde coastline in preference to Penwortham. Examples of this are listed above.</p> <p>Stanah has access to expand on immediately adjacent space on the nationally approved 138hectare HTEZ site, specifically designated to support energy projects.</p>							
REP2-059 059.13	<table><tr><td colspan="3"><b>Table Part 6:</b></td></tr><tr><td></td><td><p>Text from relevant representation of the Author of REP1-117</p><p>(Bold Text below applied to highlight particular features)</p></td><td><p>LALC FAC EWG Notes on report of NGET PLC's Freedom of Information request reply in REP1-117</p></td></tr></table>		<b>Table Part 6:</b>				<p>Text from relevant representation of the Author of REP1-117</p> <p>(Bold Text below applied to highlight particular features)</p>	<p>LALC FAC EWG Notes on report of NGET PLC's Freedom of Information request reply in REP1-117</p>	
<b>Table Part 6:</b>									
	<p>Text from relevant representation of the Author of REP1-117</p> <p>(Bold Text below applied to highlight particular features)</p>	<p>LALC FAC EWG Notes on report of NGET PLC's Freedom of Information request reply in REP1-117</p>							

Reference	Written Representation Comment		Applicants' response
	8	<p>Unlike Stanah, Penwortham substation <b>currently</b> has the flexibility and capacity <b>on-site</b> to facilitate Morgan and Morecambe's connection requests."</p> <p>Stanah's site location has great flexibility to facilitate Morgan and Morecambe's connection requests as it is adjacent to the 138 hectare HTEZ. This was noted as early as 2008 in National Grid's input to the UK Offshore Energy Strategic Environment Assessment (SEA). Stanah's location thus offers great opportunity to create undertake development with efficiency and economy, avoiding the additional risk, time and costs associated with implementing two completely new independent cable routes of 30km each between the shores of the Fylde Coastal Plain to the West Lancashire Plain in which Penwortham is located.</p> <p>Penwortham is the subject of significant and complex required expansion, including potentially requiring further compulsory land acquisition as detailed in Rep1-O89, so the current functional and physical capacity of the Penwortham site is clearly insufficient as reported in NGET's written representation. This also details the multiple enduring unresolved matters at conflict with facilitating Morgan and Morecambe's connection requests."</p>	

## 2.6 Marine Management Organisation

The Applicants' response to MMO submission at Deadline 2 (REP2-061) is provided in Annex 2.2 to Applicants' Response to IP submissions: MMO (Document Reference: S\_D3\_2.2).

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## 2.7 Natural England

The Applicants' response to Natural England submissions at Deadline 2 (REP2-062 and REP2-063) is provided in Annex 2.3 to Applicants' Response to IP submissions: Natural England (Document Reference: S\_D3\_2.3).



## 2.8 Newton with Clifton and Freckleton Parish Councils

**Table 2.6: REP2-064 –Newton with Clifton and Freckleton Parish Councils**

Reference	Written Representation Comment	Applicants' response
REP2-064 064.1	<p>Commentary on The Applicants' Submission at Deadline 1 on 20 May 2025 for Issue Specific Hearing 1 Action Points 6, 8, 9, 19, 26 and 28 – REP1-039</p> <p>We thank the Examining Authority for the opportunity to comment further on the Applicants' response to issues raised at the Issue Specific Hearing 1, taking into account further information that has become available and which we believe is pertinent to the argument we have previously made before the Authority.</p> <p>The Applicant has provided a lengthy exposition to support their assertions, but we would note the following issues:</p>	<p>The Applicants' have responded to all matters raised by the Parish Councils in Applicants' response to Hearing Action Points: ISH1 6, 8, 9, 19, 26 &amp; 28 - Rev F01 (REP1-039) and Annex 3.4 to the Applicants' Response to WRs: Newton with Clifton and Freckleton Parish Councils (REP2-035).</p>
REP2-064 064.2	<p>1) At the outset, the Holistic Network Design Report (HNDR) states at 5.1.16, the Applicants proposed a solution whereby connections would share a land substation site and landfall of cable corridors, which NESO adopted in preference to any alternatives.</p> <p>This is not what we currently see in this application which is for two projects installing cables independently and feeding two distinctly separate substations (see REP1-083 Lancashire Association of Local Councils Fylde Area Committee Energy Working Group submission at Deadline 1). There is no evidence that there has been a re-appraisal of the designs by the Applicants or NESO, whilst this option clearly increases adverse impacts to communities, project risks and unnecessary costs.</p>	<p>REP1-083.6 of Annex 3.1 to the Applicant's response to Written Representations (REP2-032) responds to this point, by explaining that the role of the HND was to identify the Point of Interconnection (POI) not mandate substation locations which the HND recognises is for later detailed design. As explained, the Applicants' approach to co-locating substations in the same zone allows for the delivery of a shared cable corridor as recommended by the HND.</p>
REP2-064	<p>2) The Applicants state that it was NESO who decided the connection point, see para 1.3.1.3 of REP1-083, but no</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'</p>

Reference	Written Representation Comment	Applicants' response
064.3	<p>evidence is provided for this, and nowhere is there evidence offered that the option for Hillhouse/Stanah was ever fully considered by either the Applicant or NESO.</p> <p>Early developments of wind energy projects in the Irish Sea saw Stanah as the more favourable point for connection compared to Penwortham, being the closest substation to the Irish Sea which did not need to interfere with protected shore areas or offshore areas.</p> <p>Surprisingly, the HNDR is silent on the subject entirely. It is unclear as to whether the grounds for an earlier rejection based on space and access constraints, dating back to 2008 and clearly in reference to Moorside in Cumbria, were refreshed following the declaration of the EZ at Hillhouse, which then offered plenty of space and access for developments of this nature.</p>	<p>response to Hearing Action Points: ISH1 6, 8, 9, 19, 26 &amp; 28 - Rev F01 (REP1-039).</p> <p>In particular, the Applicants refer to Section 3.4.1.8 – 3.4.1.10 of REP1-039 which explains the comparative consideration given to the POI options during the HND process, including Stanah (see also the footnoted reference to the HNDR showing the plan of the existing NGET substations considered which includes Stanah - Figure 32 of Appendix B to Appendix 2 to the HNDR).</p> <p>Also as set out Section 4.1.1.4 of REP1-039, the separate statutory functions, process, technical standards and expertise which govern identifying a PoI means the “Northern Route via Hillhouse Stanah” is manifestly not an “obviously material consideration”.</p>
REP2-064 064.4	<p>3) There has been no recognition of the 400kV line that already links the existing substation at Stanah via a T-junction to the National Grid transmission lines that travel south from the Middleton substation at Heysham to the substation at Penwortham. An informal assessment of the line capability would indicate that, whilst obeying the requirements of the Security and Quality of Supply Standard (SQSS) set by Ofgem, the line can carry a power load of approximately 6.9GW. It is recognised that the Stanah substation is currently too small, but there are up to 138 hectares available adjacent to the site for its expansion. Contrast this with problems connecting at Penwortham identified by NGET and outlined below.</p> <p>We note that it is the SQSS that defines the Power Quality requirements that have to be achieved to couple a new source of power to the National Grid, which determines the design and characteristics of the substations which provide this power. It is of note that the SQSS requires the</p>	<p>The Applicants note the comments and refer the Parish Councils to sections 2,3,4,5 and 6 of the Applicants' response to Hearing Action Points: ISH1 6, 8, 9, 19, 26 &amp; 28 - Rev F01 (REP1-039). In particular, the Applicants refer to Sections 3.2 - 3.5 of REP1-039, which explain the process by which those with the relevant expertise and whole-system view (NESO and NGET) were engaged in identifying the PoI at the NGET Penwortham substation.</p> <p>The Parish Councils' “Northern Route via Hillhouse Stanah” proposes “reconductoring” works to the existing overhead line between Stanah and Penwortham (and also to Hambleton – Heysham) – this is set out in Table 1 to the Parish Councils' response. This accepts that electricity from the proposed connection into the NETS at Stanah (with Project substations at Hillhouse) would still need to make its way to the NGET Penwortham substation.</p>

Reference	Written Representation Comment	Applicants' response
	substation to be as close to the Grid as possible. As Stanah already has an appropriate Grid connection, this distance can be fully met at any site on Hillhouse.	The alleged "Northern Route via Hillhouse / Stanah" is a longer route from the coast to Penwortham than the Applicants' proposal. The most direct route from coast to Stanah to Penwortham ("as the crow flies") is approximately 26.49km (without consideration of siting principles, or constraints). The most direct route from the Applicants' landfall to the Ribble and then Penwortham "as the crow flies" is approximately 20km (also before the application of siting principle or consideration of constraints)
REP2-064 064.5	4) As indicated by REP1-039, no mention is made by the Applicants or NESO of the requirements placed on any solution that it is efficient and cost-effective (see section 163(1)(c) of the Energy Act 2023 (NESO is called ISOP in that Act)). Clearly, maximising use of existing infrastructure and sites with adequate development space will be more effective in achieving these objectives. The initial estimate of savings, which allowed for additional work to bring the Stanah/Hillhouse site up to the required standard and an element of addition cabling on the existing power lines, showed as saving of approximately £450m. Following the issue of the latest IET data, the same assessment technique has been repeated and the forecast saving is now approximately £904m. This means that Stanah is an 'obviously material' alternative not just in planning terms but also when NESO and Ofgem exercise their statutory functions.	<p>The Parish Council's analysis of cost – and the £904m figure – is based on the per km cost of different technologies. Although the distance to Penwortham of the "Northern Route via Hillhouse Stanah" is longer than the proposed project, the Parish Councils' identified saving is based on the lower cost of reconductoring compared to underground cables or a new overhead line.</p> <p>However, it is not open to the Applicants to independently use or interfere with NGET's transmission network, which includes the existing OHL between Stanah and Penwortham proposed to be reconducted. The suggestion that this is even technically possible, strategically appropriate or compliant with regulatory requirements such as the SQSS is wholly speculative and contrary to NESO's expert review and decision. As explained in Section 3.5.1.4 of the REP1-039, this would also amount to a change to the contracted Pol offered by NESO on the basis of the HND, which is not in the Applicant's control so the "Northern Route via Hillhouse / Stanah" remains purely hypothetical.</p> <p>Returning to what is within the control of the Applicants', the Project substations could in theory be located at Hillhouse, but this would require the Applicants to get the electricity to the Pol at Penwortham. This would involve new underground cabling (the Applicants would not propose new overhead lines) from the landfall to Hillhouse / Stanah and then to Penwortham which is longer, and so applying the Parish Councils' methodology, more expensive</p>

Reference	Written Representation Comment	Applicants' response
		<p>than the shorter proposed application. This also gives no consideration to potential environmental and other constraints.</p> <p>The Applicants' note four further points:</p> <ul style="list-style-type: none"> <li>• The costings for the suggested Northern Route are based on a report that was not intended to be used by any party for the purpose of estimating project costs (as confirmed in the Mott MacDonald Report itself). The extent to which the costs of one transmission technology are greater or lesser than those of another can vary considerably according to the specific circumstances of any particular project. The report was intended to simply act as an independent comparison of different technology types which may reasonably be expected to be deployed on the GB electricity transmission system within the next 10-15 years. As noted in the report, it is not: "...to be used as a substitute for proper application of engineering and costing principles to transmission related projects. The report should not be used as a reference source in relation to the commercial, technical, economic, or financial performance of projects".</li> <li>• In terms of the location identified for the Project substations, the Applicants' site selection principles and search radius from the Pol identified a radius of 5km from the Pol, later extended to 8km. This is explained in response to Hearing Action Point ISH1_10 (REP1-037), which notes in relation to the search radius "This is based on electrical engineering constraints identified through early engagement with supply chain: to minimise cable reactive power issues and transmission losses, and to maximise economic efficiency." So the costing discussion above of Project substations at Hillhouse is purely hypothetical.</li> <li>• The Applicants do not agree with the informal technical assessment of the Parish Councils, but note that NGET has been asked to respond to in ExAQ 1.2.1.</li> </ul>

Reference	Written Representation Comment	Applicants' response
		<ul style="list-style-type: none"> <li>It is not the role of consenting regime set up by the Planning Act 2008 to act as a forum to determine whether or not NESO has complied with section 163(1)(c) of the Energy Act 2023.</li> </ul> <p>The Applicants also reiterate that it is not necessary or appropriate for this Examination to engage in any detailed assessment of the Northern Route via Hillhouse / Stanah. This is not supported by Government policy on alternatives set out in paragraphs 4.3.22 - 4.3.29 of EN-1 and in particular paragraph 4.3.28 which states:</p> <p><i>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</i></p> <p>In addition, and as set out Section 4.1.1.4 of REP1-039, the separate statutory functions, process, technical standards and expertise which govern identifying a PoI means the "Northern Route via Hillhouse Stanah" is manifestly not an "obviously material consideration".</p>
REP2-064 064.6	5) NGET have provided information in REP1-089 which identifies serious clashes between this application and the proposed alterations and connections at Penwortham, some of which are yet to be approved by Ofgem and may need to change. The planned Penwortham Development for National Grid purposes includes a supply from the site to Network Rail, which conflicts with the Applicants' Statements to date. Further, other parts of the site are to accommodate a series of battery installations that add to the National Grid system stability.	The Applicants refer the Parish Councils to Section 6 (Details of agreement with National Grid for Penwortham Connection) in the Applicants' response to Hearing Action Points: ISH1 6, 8, 9, 19, 26 & 28 - Rev F01 (REP1-039).
REP2-064	In summary, there is still no justification for ignoring the Hillhouse/Stanah alternative and worse, the plan shows no	


Reference	Written Representation Comment	Applicants' response
064.7	<p>consideration for either proposed National Grid developments at Penwortham or the East Irish Sea Transmission NSIP project which is also advertising that it is looking to connect at Penwortham 2032-2033.</p> <p>There remains no evidence presented of any consistent, complete, comparative assessment for the implications for consumers of the whole system of connecting generation assets, whether that be via Stanah to Penwortham and beyond utilising provisioned infrastructure or a 30km land route connecting new cable infrastructure directly to Penwortham. This therefore shows no compliance with the requirement for efficiency or economy, for the lowest cost to the consumer that is deliverable and avoids adverse impacts to the environment and communities, as required by the Offshore Transmission Network Review (OTNR) and the HNDR.</p> <p>Any option that does this under any other circumstances that avoids having to construct 60km or unnecessary new cabling with savings in time, risk and £904m (see appended Table) would logically be an obviously material alternative.</p> <p>A further advantage would be that adoption of Hillhouse would allow for decoupled build plans with no further impact.</p>	
REP2-064 064.8	<p><b>Comparative Assessment of Costs Between Northern Route via Hillhouse Stanah and the Morgan &amp; Morgan Applicants' (M&amp;M) Proposals</b></p> <p>The following tables show a Comparative Assessment of Costs Between a Northern Route via Hillhouse Stanah and the Morgan &amp; Morecambe Applicants' (M&amp;M) Proposals.</p> <p>This utilises the costings in the recently published independent report by the Institute of Engineering and</p>	See response at REP2-064 064.4

Reference	Written Representation Comment	Applicants' response
	<p>Technology (IET) "A Comparison of Electricity Transmission Technologies: Costs and Characteristics An independent report by Mott MacDonald in conjunction with the IET"</p> <p>Link - <a href="https://www.theiet.org/media/axwkktkb/100110238_001-rev-j-electricity-transmission-costs-and-characteristics_final-full.pdf">https://www.theiet.org/media/axwkktkb/100110238_001-rev-j-electricity-transmission-costs-and-characteristics_final-full.pdf</a></p> <p>Including provision for a reconductoring of the existing 400kV twin circuit Overhead Line between Stanah and Penwortham substations, savings of some £904,000,000 for investors , developers and consumers, in comparison to the proposals by the Morgan and Morecambe project Applicants entirely new infrastructure approach.</p>	



## 2.9 Royal National Lifeboat Institution

Table 2.7: REP2-065 –Royal National Lifeboat Institution

Reference	Written Representation Comment	Applicants' response
REP2-065 065.1	<p>In our submission there is reference to the provision of a plan that was not available for inclusion by the deadline date. The plan is attached.</p> 	<p>The Applicants note this comment. The Royal National Lifeboat Institution (RNLI) provided the plan to the Applicants by email on 22 May 2025, and thus, the plan was considered in the Applicants' response to RNLI 's written representation (REP1-097) submitted at Deadline 2 (Table 2.11 in Section 2.14 of the Applicants' Response to Written Representations from Statutory Consultees and other Organisations (REP2-031)).</p>

## 2.10 South Ribble Borough Council

**Table 2.8: REP2-066 –South Ribble Borough Council**

Reference	Written Representation Comment	Applicants' response
REP2-066 066.1	<p><b>Introduction</b></p> <p>Comments are hereby presented on behalf of South Ribble Borough Council ('the Council') and sets out the Council's thoughts with regards to the following. The order in which they are presented should not be taken to imply any degree of significance.</p> <ul style="list-style-type: none"> <li>• Comments on written representations</li> <li>• Comments on local impact reports</li> <li>• Comments on the applicants revised draft Development Consent Order</li> <li>• Comments on the applicants draft itinerary for accompanied site inspection</li> </ul>	The Applicants note this comment.
REP2-066 066.2	<p><b>Comments on written representations</b></p> <p>Having regard to the written representation provided by other parties, the Council must refer to the following:</p>	The Applicants note this comment.
REP2-066 066.3	a) the Council concurs with Blackpool Councils comment (REP1-070) that it neither supports nor opposes the proposal.	The Applicants acknowledge that South Ribble Borough Council neither supports nor opposes the Project.
REP2-066 066.4	b) South Ribble Borough Council remains concerned that the proposal documentation remains incomplete, and that environmental assessment is inadequate as noted by a number of respondents including Fylde Borough Council (REP1-079)	<p>The Applicants note this response, but stand by the assessment within the ES and its conclusions, which have been prepared in accordance with best practice EIA guidance and undertaken by chartered and experienced practitioners appointed to deliver this part of the DCO submission.</p> <p>The Applicants note that the ExA has requested as part of Q1.3.2 (S_D3_3) that Fylde Borough Council provides '<i>relevant policy, case law, guidance or published advice that supports its position</i>'. The Applicants</p>

Reference	Written Representation Comment	Applicants' response
		welcome this request for clarification and will respond to any further submissions by the Council on this point.
REP2-066 066.5	c) As suggested within REP1-095 (Preston City Council) at paragraphs 4.5.4 – 4.5.6, the hours of construction of 8am to 6pm seem to be more acceptable and protective of the amenity of residents of South Ribble, regardless of rebuttal by the applicant in document PDA-026 to South Ribble's Relevant Representation RR-2027-45, which appears to completely disregard the Council's concerns. (see DCO comments below).	The Applicants note South Ribble Borough Council's response and will continue to engage with them further on this. However, the Applicants also refer the Council to the Applicants response to Q1.1.5 (S_D3_3).
REP2-066 066.6	<b>Comments on local impact reports</b> No additional comments to make other than the Council's formal LIR submission	The Applicants have responded to the South Ribble Borough Council Local Impact Report within (S_D3_4).
REP2-066 066.7	<b>Comments on the applicants revised draft Development Consent Order</b> Having regard to the aforementioned draft DCO, please note the Council's comments:	The Applicants note this comment and have responded below to each point.
REP2-066 066.8	a) South Ribble Borough Council defers to Lancashire County Council as the highways authority for all matters relating to the highway.	The Applicants note that South Ribble Borough Council defers to Lancashire County Council as the highways authority.
REP2-066 066.9	b) Part 6, Point 47: Inconsistent Planning Permission – This paragraph states that ' <i>conditions of a planning permission granted ... which relate to land within the order limits or land adjacent to order limits cease to have effect to the extent they are inconsistent with the authorised project</i> '. May I again draw your attention to Point 17 of the Council's written reps (REP1-097, May 2025) with regards to the	The Applicants refer South Ribble Borough Council to REP2-031 Section 2.15 Reference REP1-097 1.8 The draft DCO submitted at Deadline 2 (REP2-004) amended Article 47 to allow for the DCO and any planning permission granted under the TCPA to both lawfully exist within the Order limits, so far as possible).

Reference	Written Representation Comment	Applicants' response
	<p>recently granted, partially constructed planning permission for a battery storage facility on Howick Cross Lane, Penwortham. For your convenience this is repeated below:</p> <p><b>‘Crown Land</b> – <i>It is noted that land identified on plan DM_22003214_CLP_1. Sheets 8 and 9 are in the ownership of the King's Most Excellent Majesty In Right Of His Duchy Of Lancaster, and the Ministry of Housing, Communities and Local Government. MHCLG Parcel 18.005 however also forms part of planning permission 07/2024/00013/VAR issued by this Council which has been implemented for development of a 49.99 MW Battery Storage Facility, with associated infrastructure and landscaping. The western section of this site which has been developed, is shown on drawing MOR001-FLO-CONENV-PLN-0031-MRCNS-J3303-JVW-10012 as being proposed for 19A/19B (Morgan/Morecambe construction access works), and may no longer be an available route for construction access. An extract from the approved site plan is provided below’</i> [provided in REP2-066].</p>	<p>The Applicants are in on-going discussions with the landowner regarding the proposed access in this location and the ability for the projects to co-exist so the access route can be used.</p>
REP2-066 066.10	<p>c) Schedule 1, Part 1 (Authorised Development) – work numbers 30A/B and 31/B identify construction compounds of up to 30,000m<sup>2</sup>. In the Council’s opinion this is excessive particularly as the area within the Council’s boundary is limited.</p>	<p>The Applicants note South Ribble Borough Council’s comment, however, would confirm that this area is required in order to undertake a complex trenchless crossing of the River Ribble.</p>
REP2-066 066.11	<p>d) Schedule 2A/2B Point 14 – As noted in both Relevant (PDA-026) and Written (REP1097) representation provided by this Council, the construction hours quoted, which includes 7am to 7pm, and 24hr trench work are considered excessive. Notwithstanding emergency works, the amenity</p>	<p>The Applicants direct South Ribble to their response above to REP2-066 066.5.</p>

Reference	Written Representation Comment	Applicants' response
	of South Ribble residents is paramount and reduced hours where practicable are requested.	
REP2-066 066.12	e) Schedule 2A/2B Point 16 – the Council welcomes the inclusion of a prescribed, 12 month landscape restoration period.	The Applicants note South Ribble Borough Council's agreement of the landscape restoration period.
REP2-066 066.13	f) Schedule 2A/2B Point 19 – the Council questions why Employment and Skills would be subject only to consultation with Lancashire County Council. South Ribble would request consultation with its own Economic Development team.	The Applicants note this response and have updated Requirement 19 of Schedules 2A and 2B to include South Ribble Borough Council as a consultee.
REP2-066 066.14	g) Schedule 11A/11B – removal of hedgerow and important hedgerow within South Ribble is considered to be excessive, but subject to full, compensatory mitigation is on balance accepted as necessary.	The Applicants note that, on balance, South Ribble Borough Council accepts that hedgerow removal will be required.
REP2-066 066.15	h) Whilst detail is provided in the DCO with regards to compensation for various parties, there is no mention of a Community Benefit Fund for those local residents affected by the proposal. The applicant in response to Relevant Representation (RR-2027-45) in document PDA-026 states <i>'the Department for Energy Security and Net Zero has recently published its guidance on Community Funds [Morgan and Morecambe Offshore Wind Farms: Transmission Assets Document S_PD_3.2.19 Page 39] for Transmission infrastructure. The Applicants will take cognisance of this guidance in the creation of a fund and liaise with the Local Planning Authorities on its establishment'</i> . 'Taking cognisance' is not in the Council's opinion a commitment to providing community funding.	<p>As noted in the Statement of Reasons submitted at Deadline 1 (REP1-012), the Applicants are committed to delivering a community benefit fund in line with the Community Funds for Transmission Infrastructure guidance. 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.</p> <p>In alignment with the guidance, the Applicants propose to engage with key stakeholders later this year. Local authorities, and parish, community and/or town councils are well placed to act as a first point of contact to ensure that any community benefit scheme considers the needs of the community and supports local priorities, where possible.</p>

Reference	Written Representation Comment	Applicants' response
	Discussion with the applicant has proven fruitless on this matter and this lack of detail or commitment at such a late stage is concerning.	The Applicants would like to provide some reassurance to South Ribble Borough Council and confirm that they will form part of these discussions.
REP2-066 066.16	<b>Comments on the applicants draft itinerary for accompanied site inspection (ASI)</b> a) An itinerary for the ASI has not been provided, but the Council has lodged a request to attend. It is not considered necessary however for the Council's representative to attend ASI visits north of the River Ribble.	The Applicants note that an itinerary for the accompanied site inspection was shared on 19 June 2025 (EV1-003). South Ribble's attendance is noted.
REP2-066 066.17	<b>Comments on any further information/submissions received by deadline 1.</b> a) No comments to note with regards to Mr Cliff's site visit of the 19-21st May 2025	The Applicants note this response.
REP2-066 066.18	This representation is submitted for, and on behalf of South Ribble Borough Council. Should you have any comments or questions please do not hesitate to contact us	Thank you. The Applicants will continue to liaise with South Ribble Borough Council throughout the Examination.

## 2.11 Additional Deadline 1 Submissions from Christine Fare, John Fare & Fare Farms Limited

**Table 2.9: REP1-119 – Christine Fare, John Fare & Fare Farms Limited (Additional Deadline 1 Submission)**

Reference	Written Representation Comment	Applicants' response
The Applicants have responded at Deadline 2 to the initial Deadline 1 Submission made by the Interested Party, refer to responses 199.1 to 199.13 of the Applicants' Response to Written Representations from People with interest in Land (REP2-030).		
REP1-119 119.14	<b>1. Background</b> I attach under the Appendices to these further Submissions, my initial Submissions to the Inspectorate dated 11th April 205.	The Applicants note the response.
REP1-119 119.15	<b>2. Further Submissions</b> My initial Submissions stand and the concerns expressed therein remain. The basis on which the DCO Application has been made is fundamentally flawed and their delivery is therefore, in my Submission, uncertain. The rationale for that statement can be summarised as follows – <ul style="list-style-type: none"> <li>• Uncertainty around compulsory acquisition, temporary possession and the timing and delivery of both Schemes and whether they will be delivered in parallel consequentially.</li> </ul>	<p>The Applicants refer to section 2.2 of REP1-061 which responds to the points made in the Fare's original submissions.</p> <p>The Applicants have set out their justification for compulsory acquisition and temporary possession powers in the Statement of Reasons (REP1-012). In addition, the Applicants refer Mr and Mrs Fare to The Applicants' Hearing Summary of the Compulsory Acquisition Hearing 1 (REP1-036) which provides further clarity on the Applicants approach to compulsory acquisition of land and rights sought under the Planning Act 2008.</p> <p>Regarding the delivery of the projects, the Applicants refer to Annex 5.2 to the Applicants response to HAP ISH1 6,8,9, 19 and 26 (REP1-039) which provides further explanation of the reasons the projects require the ability to deliver their transmission assets independently of each other.</p>
REP1-119 119.16	<ul style="list-style-type: none"> <li>• Acknowledging that I and my clients are not ecologists, the ecological survey is not yet complete and, therefore, we fail to understand how a proper assessment has been made of the ecological issues in the Scheme's routing and design.</li> </ul>	The Applicants confirm that site-specific ecological surveys have been undertaken to provide the necessary level of detail to robustly characterise the ecological baseline and the assessment of effects, which helped to refine the site selection process.



Reference	Written Representation Comment	Applicants' response
		The site selection process has sought to avoid/minimise impacts on ecological receptors. This is described in Volume 1, Annex 4.3: Selection and refinement of onshore infrastructure (AS-028). Each stage of the site selection process has involved gathering data from different sources (e.g. desktop studies and physical surveys) to define and assess route selection and design. On this basis, the routing and design of the Transmission Assets has taken into account an appropriate assessment of ecological receptors and has identified and secured appropriate mitigation where needed.
REP1-119 119.17	<ul style="list-style-type: none"> <li>The visual impact on planning terms of the sub-stations to be situated in Freckleton has not been adequately assessed and in our view, have an unacceptable affect on a Greenbelt in this part of the Fylde given their scale, location and design.</li> <li>It is therefore our view the selection processes for the siting of the sub-stations is fundamentally flawed.</li> </ul>	<p><u>Landscape and Visual Impacts</u></p> <p>The Applicants stand by the assessment within the Environmental Statement and its conclusions, which have been prepared in accordance with best practice Environmental Impact Assessment guidance and undertaken by chartered and experienced practitioners. There are no details pertaining to the Volume 3, Chapter 10: Landscape and Visual Resources (APP-123) that are absent or insufficient to adequately inform the assessment.</p> <p><u>Kirkham and Freckleton Green Belt and Substation Design</u></p> <p>The Applicants refer to their response in Procedural Deadline A Submission – Annex 3.2.23 to Response to RR-Fylde Borough Council (RR-705) (PDA-030), specifically at 705.14.</p> <p>Notwithstanding that the starting point for decision-making is that the test of very special circumstances is presumed to be met by virtue of the works comprising Critical National Priority (CNP) Infrastructure, the Applicants have demonstrated that any harm likely to be caused to the Green Belt by reason of inappropriateness or any other harm, is clearly outweighed by other considerations. An assessment of the significant need for and benefits to be delivered by the Transmission Assets, which includes the significant beneficial impacts to be realised by energy transmission from renewable sources, and consideration of how they relate to the planning balance is presented in Section 6 of the Planning Statement (REP1-032). The Applicants maintain that the Transmission Assets benefit from the presumptions given to CNP Infrastructure set out in paragraphs 4.2.16 and 4.2.17 of EN-1, which state that the “<i>Secretary of State will take as the starting point for decision making that such infrastructure is to be treated as if</i></p>

Reference	Written Representation Comment	Applicants' response
		<p><i>it has 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</i>" provided that the mitigation hierarchy requirements set out in paragraph 3.3.63 of EN-1 have been met (as set out in Section 3.4.4.15 of the Planning Statement (REP1-032). This includes the requirements for very special circumstances to justify development in the Green Belt. NPS EN-1 (paragraph 3.2.6) states <i>that "all applications for development consent for the types of infrastructure covered by this NPS [should be assessed] on the basis that the government has demonstrated that there is a need for those types of infrastructure which is urgent..."</i> and that <i>"substantial weight should be given to this need when considering applications for development consent under the Planning Act 2008"</i> (paragraph 3.2.7).</p> <p>The outline Design Principles (oDP) document (APP-209) sets out the considerations that will inform the detailed design of the works at each of the onshore substations, including their height, layout and maximum footprint, post-consent. The detailed design of each of the substations will be developed substantially in accordance with the oDP, as secured by Requirement 4(2) of Schedule 2A and Schedule 2B of the draft DCO (REP2-004). These details will be submitted to and approved by the relevant planning authority prior to start of construction at each of the onshore substations.</p> <p>Furthermore, Section 10.9 of Volume 3, Chapter 10: Landscape and Visual Resources (APP-123) sets out the three types of mitigation measures adopted by the Applicants, referred to as 'Commitments'. These Commitments will work with the measures documented within the outline Landscape Management Plan (AS-050) (oLMP). Both the oLMP and oDP will inform and guide the detailed design of the Transmission Assets, post-consent.</p> <p><u><i>Site Selection Process</i></u></p> <p>The Applicants refer to Volume 1, Annex 4.3: Selection and Refinement of the Onshore Infrastructure (APP-033). This document demonstrates the robust process of site selection and refinement undertaken by the Applicants</p>

Reference	Written Representation Comment	Applicants' response
		<p>in determining the routing and placement of the Transmission Assets onshore infrastructure through from inception to DCO submission. This document illustrates how the site selection and refinement process considered Green Belt as part of the environmental constraint analysis, and how Transmission Assets have been sited to avoid (where practicable) areas within the Green Belt.</p> <p>The Applicants refer to Annex 5.2 to the Applicants response to Hearing Action Points: ISH1 6, 8, 9, 19, 26 &amp; 28 (REP1-039), which provides clarity on the need for two onshore substations as the projects must be electrically independent.</p> <p>In addition, the Applicants provided a comparison to the size of the onshore substation against the size of onshore substations which form part of other offshore wind farms infrastructure, this can be found in Annex 5.5 to the Applicants response to Hearing Action Points: ISH1 20 Comparable Onshore Substation Platform Footprints (REP1-042).</p>
REP1-119 119.18	<p>The impact of the Scheme on my client's business and them personally is going to be significant and whilst and they acknowledge many of those matters can be dealt with by compensation, my clients would far rather this Scheme didn't proceed and left them to continue to run their business unaffected. Feelings that are exacerbated when you believe there are fundamental flaws, as outlined above, in the design of the Scheme, its routing and siting and the manner in which it is being delivered.</p>	<p>The Applicants acknowledge the impact on the holding and have identified within the Land Use and Recreation Chapter (APP-104) that the onshore substations will result in a permanent major adverse significant effect on agricultural land quality. The assessment concludes that there will also be a long term temporary moderate adverse significant effect on farm holdings caused by the construction works for the substations including earthworks and permanent access roads. The Applicants refer to their response PDA-044 044.1 (REP1-061) regarding the assessments completed on farm holdings.</p> <p>The Applicants have provided a plan based on the information available to them showing the extent of the Fares holding which is identified as landholding 26 within Annex 5.8 to the Applicants response to Hearing Actions Points: ISH1 46 Distribution of Land Holdings (REP1-044). This also shows the extent of potential disruption across the holding.</p> <p>The Applicants met with Mr and Mrs Fare and their agent most recently on 13<sup>th</sup> May 2025. The meeting included a walkover of the farm for the Applicants to better understand the impact on the holding and to discuss mitigation measures that could reduce the impact on the holding. The Applicants are committed to seeking a voluntary agreement and will continue</p>

Reference	Written Representation Comment	Applicants' response
		<p>to engage with Mr and Mrs Fare and their appointed land agent on the matters raised.</p> <p>The Planning Statement (REP1-032) and Planning Statement Addendum (REP2-042) sets out in detail the need for the Transmission Assets to deliver the electricity generated by the Morgan Offshore Wind Project: Generation Assets and the Morecambe Offshore Windfarm: Generation Assets and the contribution the offshore wind farms would make towards achieving the Government's climate change objectives as set out in legislation and national policy.</p> <p>The Applicants refer to the above response REP1-119 119.17 regarding the design and siting of the substation.</p> <p>The Applicants note the submission and refer Mr and Mrs Fare to paragraph 2.31 Site selection and assessment of alternatives (PDA-005) which explains in detail the Applicants' approach to site selection. The Applicants also refer the Fares to ES Volume 1, Chapter 4: Site selection and consideration of alternatives (AS-026).</p>
REP1-119 119.19	<p><b>3. Conclusion</b></p> <p>The above is a further summary of the issues and concerns that my clients have in respect of the Scheme and I further reserve the position to make further Submissions in respect of matters scheduled here in subsequently at the Compulsory Acquisition Hearing and the affect of the Scheme on my client's property.</p>	The Applicants note the response.

## 2.12 Michael Robert Gornall

**Table 2.10: REP2-067– Michael Robert Gornall**

Reference	Written Representation Comment	Applicants' response
REP2-067.1	Summary of points made at relevant representations	<p>The Applicants recognise Mr Gornall's submission as being a summary of what was submitted in RR-1504. The Applicants have addressed all of the points raised within this summary within Procedural deadline A Submission - 3.1 The Applicants' Response to Relevant Representations Part 1 - Introduction and thematic responses (PDA-005).</p> <p>However, for ease of reference for Mr Gornall, the Applicants have added further detail from material submitted at Deadline 2 below. The documents referenced in the Applicants' responses below can be found on the Planning Inspectorate website, document tab, and navigated to by their PINs reference using the top link 'view examination library'.</p>
REP2-067.2	We consider that a much shorter, cheaper, less damaging alternative can connect to Penwortham via Stanah, using an existing National 400Kv Grid line. 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 causing significant permanent harm. 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>The Applicants provided an initial response on site selection and the assessment of alternatives at section 2.31.1 of The Applicants' Response to Relevant Representations Part 1 - Introduction and thematic responses (PDA-005). Following discussions relating to site selection and alternatives at Issue Specific Hearing 1 and in response to a number of the Examining Authority's Hearing Action Points, the Applicants provided a detailed technical response on these matters including explaining why the proposed alternative connection to Stanah or via an alternative route or Point of Interconnection for the Transmission Assets is not feasible. This was provided at Deadline 1 in Annex 5.2 to the Applicants response to Hearing Action Points: ISH1 6, 8, 9, 19, 26 &amp; 28 - Rev F01 (REP1-039) and highlighted:</p> <ul style="list-style-type: none"> <li>The Point of Interconnection (PoI) is the "terminating point" (in the language of paragraph 2.2.1 of NPS EN-5) where the projects connect to the National Electricity Transmission System owned by NGET. The PoI for the projects is at the NGET Penwortham substation. The PoI 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</li> </ul>
REP2-067.3	National Planning considerations - The NPPF sets out the need for "very special circumstances" to justify use of Green Belt land and that there should be consideration of	

Reference	Written Representation Comment	Applicants' response
	<p>public health and wider defence and security issues. The Applicants' case does not adequately justify the use of green belt or take adequate account of these other issues. Concerns arise over site selection, The Site selection was clearly predetermined given the extension of search area from 5km to 8km, and the downgrading of taking 22 Hectares of Green Belt to Amber instead of Black or Red. The Applicants' comparison of alternative routeings was superficial and not clearly explained and may have been flawed.</p>	<p>UK's Electricity System Operator Licensee) is responsible, with input from National Grid Electricity Transmission (NGET) and the Applicants. The PoI was informed by the Holistic Network Design (HND) process led by NESO. A route to Stanah would involve a change to the PoI, which is not a decision within the direct control, statutory function, or expertise of the Applicants (as explained in more detail in Section 3 of REP1-039).</p> <ul style="list-style-type: none"> <li>The Applicants reiterate that they were engaged in the HND process and carefully considered the PoI 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.</li> <li>The Applicants' position, supported by NPS policy, is that it is neither necessary nor appropriate to consider or assess hypothetical projects with alternative PoIs as part of the determination of the Transmission Assets application.</li> </ul> <p>The Applicants have responded to the concerns regarding siting of the substations on greenbelt land in their response to ISH1_7 in The Applicants' response to Hearing Action Points due at Deadline 1 (REP1-038).</p>
REP2-067.4	<p>Consultation efforts have been unsatisfactory and insufficient, leading to stakeholder frustration. It is evident 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 with many omissions in the Applicants' submission 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 have responded to concerns in relation to Consultation in Section 2.2.2 of their Response to Relevant Representations Part 1 - Introduction and thematic responses (PDA-005) in particular noting that the Acceptance Checklist (s55) (PD-003) where the Planning Inspectorate confirms in relation to adequacy of consultation it "is satisfied that the Applicants have complied with their statutory obligations." The Applicants note this was similarly acknowledged by the Examining Authority (see paragraph 30 of The Applicants' Hearing Summary of the Compulsory Acquisition Hearing 1 (REP1-036)).</p> <p>The Applicants would also note that, in addition to the above, they have carried out extensive rounds of non-statutory consultation which are detailed within the Applicants Consultation Report (APP-170 and supporting appendices APP-171 to APP-188).</p>



Reference	Written Representation Comment	Applicants' response
REP2-067.5	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>In relation to overall construction periods, the Applicants have provided consideration of potential construction scenarios and durations in their Rule 9 - ES assessment of Construction Scenarios (AS-070) at Section 1.5. The Applicants further explained their approach to construction scenarios and coordination between Morgan OWL and Morecambe OWL at Issue Specific Hearing 1 (see in particular paragraphs 11 - 34 of The Applicants' Hearing Summary of Issue Specific Hearing 1 – Day 2 (REP1-035)). Following the hearings, the Applicants have also provided further clarification in relation to construction scenarios and coordination in Annex 5.2 to the Applicants response to Hearing Action Points: ISH1 6, 8, 9, 19, 26 &amp; 28 - Rev F01 (REP1-039). Section 8 of REP1-039 explains why flexibility must be retained within the draft DCO (REP1-008) to allow for the projects to be constructed in different ways and why Morgan OWL and Morecambe OWL cannot commit to concurrent construction within the draft DCO (REP2-004).</p> <p>In relation to benefits to local communities, following discussion in Issue Specific Hearing 1, and in response to Examining Authority's Hearing Action Point ISH1_31, the Applicants have updated their Statement of Reasons with information on local community benefits. The Applicants will also be undertaking further engagement on community benefits with local stakeholders as discussed in The Applicants' response to Hearing Action Points due at Deadline 1 - Rev F01 (REP1-037).</p>
REP2-067.6	The cumulative impacts of multiple developments occurring simultaneously over an extended period with the substations and cabling occurring together with multiple solar farm projects. There has been a complete lack of adequate impact assessment to nearby communities, businesses, tourism and livelihoods. As a result existing and proposed energy projects threaten to overwhelm greenbelt areas.	<p>The Applicants have responded to the matter of cumulative effects in response to Issue Specific Hearing Action Point 29 which can be found in The Applicants' response to Hearing Action Points due at Deadline 1 - Rev F01 (REP1-037).</p> <p>The Applicants have carried out Cumulative Effects Assessment (CEA) screening and refer to Volume 1, Annex 5.5: Cumulative screening matrix and location plan (REP1-020). The Applicants also submitted a Review of Cumulative Effects Assessment and In-Combination Assessment at Deadline 2 (REP2-043).</p>

Reference	Written Representation Comment	Applicants' response
REP2-067.7	Agricultural impact - The failure to ensure concurrent rather than sequential construction will have a detrimental effect on local landowners and farmers. Instead of farmers losing significant proportions of their working 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>The Applicants addressed concerns relating to agriculture impacts at section 2.3 of The Applicants' Response to Relevant Representations Part 1 - Introduction and thematic responses (PDA-005) which sets out how the Applicants have sought to minimise impacts on agricultural land. The Applicants also addressed concerns relating to disruption to tourism and local communities and businesses at section 2.21 of The Applicants' Response to Relevant Representations Part 1 - Introduction and thematic responses (PDA-005).</p> <p>Potential impacts on farm holdings and agricultural land were also discussed at Issue Specific Hearing 1 (see paragraphs 65 – 75 of The Applicants' Hearing Summary of Issue Specific Hearing 1 – Day 2 (REP1-035)) and Compulsory Acquisition Hearing 1 (see paragraph 22 of The Applicants' Hearing Summary of Compulsory Acquisition Hearing 1 (REP1-036)) following which the Applicants have responded to a number of Hearing Action Points relating to these matters. Please see ISH1_46, ISH1_47 and CAH1_5 of The Applicants' response to Hearing Action Points due at Deadline 1 (REP1-037).</p>
REP2-067.8	Beach access at St Anne's faces will result in closures without mitigation plans and was dismissed as a concern 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>The Applicants previously addressed concerns relating to beach access in section 2.5 of The Applicants' Response to Relevant Representations Part 1 - Introduction and thematic responses (PDA-005). Following the discussions at the Hearings and in response to Hearing Action Points, the Applicants provided further detailed technical clarifications in relation to beach access in Annex 5.3 to the Applicants response to Hearing Action Points: ISH1 13, 14, 16, 17 (REP1-040).</p> <p>Further details of the public access to the beach during construction is set out in The Outline Open Space Management Plan which is at Appendix A of the Outline Public Rights of Way (PRoW) Management Plan (AS-048). This sets out the discrete working areas that will be subject to access management during construction works.</p>



Reference	Written Representation Comment	Applicants' response
REP2-067.9	Air safety concerns remain unresolved due to poor engagement with BAE Systems. The BAE sites importance for our nation's defence, and to the local economy is profound and would be compromised without an agreement on managing bird strikes. The Applicants is unresponsive to legitimate concerns on air safe indeed, it seems that there is no effective mitigation approach available to the applicant, according to BAE Systems.	<p>The Applicants acknowledge concerns raised at Issue Specific Hearing 1 relating to air safety linked to bird strike. The Applicants take all safety matters seriously. The Applicants confirmed at Issue Specific Hearing 1 that engagement with BAE and Blackpool Airport is ongoing in order to agree a strategy for a bird strike management plan (see paragraphs 60 - 64 of The Applicants' Hearing Summary of Issue Specific Hearing 1 – Day 2 (REP1-035)). The Applicants also provided responses in relation to this matter at ISH1_40 of The Applicants' response to Hearing Action Points due at Deadline 1 (REP1-037) and provided further detail in relation to engagement with both BAE and Blackpool Airport in the Deadline 1 Cover letter (REP1-001).</p> <p>At Deadline 2, the Applicants submitted the Strategy for Wildlife Hazard Management Plan (REP2-047) which has been shared with BAE and Blackpool Airport as part of the Applicants ongoing engagement with those bodies as explained in the Applicants' responses to Blackpool Airport and BAE written representations in The Applicants Responses to Written Representations from Statutory Consultees and other organisations (REP2-031). The Applicants will continue to actively engage with BAE and Blackpool Airport to resolve concerns in relation to bird strike.</p>
REP2-067.10	Road safety/congestion. Because of the location of Blackpool Airport, there are only two north / south major arterial roads between Blackpool and St Anne's. One is Clifton Drive to the west of the airport and the other is Queensway to the east of the airport. Both roads become major bottlenecks when planned roadworks are carried out on just one side of the airport, causing long queues of traffic and severe delays. Both these roads will need to be crossed by the cable route. We have not seen any 'emergency vehicle impact statement' in relation to access by Police, Fire, Ambulance and Coastguard emergency vehicles.	<p>The Applicants acknowledge the concerns relating to potential traffic congestion and disruption.</p> <p>The Applicants have provided a response to these concerns at section 2.32 of The Applicants' Response to Relevant Representations Part 1 - Introduction and thematic responses (PDA-005). Subject to the grant of the DCO, the Applicants would note that the effects of construction traffic and highway works from Transmission Assets would be managed, monitored and controlled through the development of the detailed CTMPs. In compliance with Requirement 9 of Schedules 2A and 2B of the draft DCO (REP2-004), the detailed CTMPs would need to be agreed with the relevant highway authorities. In approving the detailed CTMPs the relevant highway authorities</p>

Reference	Written Representation Comment	Applicants' response
		would apply their statutory duties under the Traffic Management Act, 2004 to ensure the “expeditious movement of traffic on the authority’s road network”.
REP2-067.11	Community benefits remain undefined despite available government guidance. Unfortunately, the Applicant has avoided defining any community benefits until the application has been approved and so cannot be regarded as benefits in supporting a decision on the application	The Applicants addressed concerns relating to local projects benefits at section 2.22 of The Applicants' Response to Relevant Representations Part 1 - Introduction and thematic responses (PDA-005). Following discussion in Issue Specific Hearing 1 in relation to community benefits and in response to Examining Authority's Hearing Action Point ISH1_31, the Applicants have updated their Statement of Reasons (REP1-012) with information on local community benefits. The Applicants will also be undertaking further engagement on community benefits with local stakeholders as discussed in The Applicants' response to Hearing Action Points due at Deadline 1 - Rev F01 (REP1-037).
REP2-067.12	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 none of these have been considered. The setting of historic buildings on Grange Lane, Newton are severely compromised and impacted as a result of this development, with no consideration or reference within the application.	The matter of heritage and archaeology is discussed in the Applicants' Response to Relevant Representations Part 1 - Introduction and thematic responses (PDA-005) at Section 2.18. The Applicants are committed to respecting the heritage of the local area and Requirement 11 of Schedules 2A and 2B of the draft DCO (REP2-004) requires that detailed Onshore and Intertidal Written Schemes of Investigation will be implemented by the Applicants as approved by Lancashire County Council in consultation with Historic England, as appropriate. Further, any archaeological works must be carried out by a suitably qualified and competent person or body previously notified to the relevant planning authority.
REP2-067.13	Biodiversity concerns persist, with protected bird species inhabiting affected areas. Temporary land use remains unaccounted for in biodiversity net gain (BNG) calculations.  Many birds on the UK red list for birds of conservation concern have been observed on the land scheduled for the	The Applicants have previously responded to concerns relating to biodiversity matters at section 2.12 of The Applicants' Response to Relevant Representations Part 1 - Introduction and thematic responses (PDA-005). A number of biodiversity matters were discussed at Issue Specific Hearing 1. In response to ISH_39, the Applicants have submitted a note on Site Selection of the Environmental Mitigation and Biodiversity Benefit Areas (REP2-046) at Deadline 2. The Applicants note that they have also submitted a Strategy for

Reference	Written Representation Comment	Applicants' response
	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	Wildlife Hazard Management Plan (REP2-047), updated outline Ecological Management Plan (REP2-018) and an updated Biodiversity Benefit Statement (REP2-020) at Deadline 2 which seek to address various concerns raised in relation to biodiversity including birds.
REP2-067.14	All of the above issues are compounded and worsened by the refusal of the applicants to consider any alignment of their works leading to a potential 10 year period of disruption	The Applicants note this response. Please refer to the Applicants' response at row REP2-067.5 above.

## 2.13 Susan Fucile

**Table 2.11: REP2-069 –Susan Fucile**

Reference	Written Representation Comment	Applicants' response
REP2-069.1	I would like to state my absolute opposition to this project. There has been no interest in the alternative sites. That are better for both areas. Better for both populations better for all involved.	<p>The Applicants note this response and have provided a response below. The documents referenced in the Applicants' responses below can be found on the Planning Inspectorate website, document tab, and navigated to by their PINs reference using the top link 'view examination library'.</p> <p>The Applicants provided an initial response on site selection and the assessment of alternatives at section 2.31.1 of The Applicants' Response to Relevant Representations Part 1 - Introduction and thematic responses (PDA-005). Following discussions relating to site selection and alternatives at Issue Specific Hearing 1 and in response to a number of the Examining Authority's Hearing Action Points, the Applicants provided a detailed technical response on these matters including explaining why the proposed alternative connection to Stanah or via an alternative route or Point of Interconnection for the Transmission Assets is not feasible. This was provided at Deadline 1 in Annex 5.2 to the Applicants response to Hearing Action Points: ISH1 6, 8, 9, 19, 26 &amp; 28 - Rev F01 (REP1-039). This highlighted:</p> <p>The Point of Interconnection (PoI) is the "terminating point" (in the language of paragraph 2.2.1 of NPS EN-5) where the projects connect to the National Electricity Transmission System owned by NGET. The PoI for the projects is at the NGET Penwortham substation. The PoI was not selected by the Applicants. It was determined by a separate process which is subject to legal duties and process, and for which NESO (the UK's Electricity System Operator Licensee) is responsible, with input from National Grid Electricity Transmission (NGET) and the Applicants. The PoI was informed by the Holistic Network Design (HND) process led by NESO. A route to Stanah would involve a change to the PoI, which is not a decision within the direct control, statutory function, or expertise of the Applicants (as explained in more detail in Section 3 of REP1-039).</p>

## 2.14 Christine Abbott

**Table 2.12: REP2-070 – Christine Abbott**

Reference	Written Representation Comment	Applicants' response
REP2-070.1	Summary of Submission (IPR: 20054040)The submission raises significant concerns about the proposed energy infrastructure project, highlighting safety, environmental, and community impacts. Key points include:	The Applicants note the response and have provided a response to the key points below. The documents referenced in the Applicants' responses below can be found on the Planning Inspectorate website, document tab, and navigated to by their PINs reference using the top link 'view examination library'.
REP2-070.2	Liquid Ethylene Pipeline Risks: The Applicant has not addressed the safety hazards posed by a liquid ethylene pipeline crossing the A583 and A584 near farms and retail areas. Ethylene's explosive nature upon air contact poses severe risks if the pipeline is damaged. A safer route, such as the Hillhouse Technology Enterprise Zone, could have been considered with proper consultation.	<p>The SABIC ethylene pipeline (MGMC_GCC_UT_1224/1231 as shown on the Onshore Crossing Schedule, REP1-016 and REP1-018) is the one which the Applicants believe is being referred to. This pipeline was part of the original utilities search data from Atkins and was considered by the Applicants and included in the crossing schedule submitted with the application in September 2024.</p> <p>The Applicants are in dialogue with all parties, including SABIC, regarding protective provisions, crossing agreements or other required consents.</p> <p>Through the Applicants' discussions with SABIC, we have noted their strict working protocols, and in turn, the protected provisions will require the Applicants to adopt appropriate working methods, provide advance notice of works, engage with SABIC and implement safeguards for pipeline infrastructure during construction. The Applicants are committed to adhering to these requirements to ensure the highest standards of health and safety during the construction phase of the Project.</p> <p>The Applicants have provided protective provisions for SABIC at Part 3 of Schedule 10 to the draft DCO (REP2-004). The status of current discussions with SABIC is presented in the SU Negotiations Progress Tracker (S_D3_10). The Applicants are confident all matters can be agreed before the close of examination which is confirmed by SABIC in REP1-195.</p>
REP2-070.3	Ecology: The project threatens the Ribble Estuary and Lytham St. Anne's Dunes SSSIs, home to protected species like Sand Lizards. The Applicant fails to address	<p>The Applicants acknowledge that a number of representations have raised concerns relating to the sand dunes and impacts on Lytham St Annes SSSI.</p> <p>The Applicants have previously addressed concerns relating to the sand</p>

Reference	Written Representation Comment	Applicants' response
	impacts on biodiversity, including timing, access management, and infrastructure placement, violating EN-1 requirements (Section 5.4). No adequate information or mitigation is provided for impacts on migratory birds, breaching EN-1 Section 5.4.22.	dunes at section 2.30 of The Applicants' Response to Relevant Representations Part 1 - Introduction and thematic responses (PDA-005). Further to this, the Applicants are in ongoing dialogue with the Environment Agency (EA) to resolve their concerns including those relating to the Lytham St Annes SSI (sand dunes) as set out at ISH1_49 of The Applicants' response to Hearing Action Points due at Deadline 1 (REP1-037).
REP2-070.4	Transboundary Environmental Concerns: A UK EIA screening identified potential impacts on Ireland, including commercial fishing, marine life, and navigation, which the Applicant has not adequately addressed.	The Applicants have responded to concerns raised around transboundary issues in The Applicants' Response to the Second Regulation 32 Transboundary Consultation Responses (REP1-062).
REP2-070.5	Cumulative Infrastructure Impact: The project, alongside Clifton Marsh and Grange Farm Solar Farms (covering ~259 acres) and Springfields Nuclear Facility (~205 acres), creates a significant footprint in small rural villages, exacerbating environmental and community strain.	<p>The Applicants have responded to matter of cumulative effects in response to Issue Specific Hearing Action Point 29 which can be found in The Applicants' response to Hearing Action Points due at Deadline 1 - Rev F01 (REP1-037).</p> <p>Springfields Nuclear Facility is not considered within the cumulative effects assessment as this is an operational site. Where relevant, this has been considered within each topics' baseline.</p> <p>The Applicants have carried out Cumulative Effects Assessment (CEA) screening and refer to Volume 1, Annex 5.5: Cumulative screening matrix and location plan (REP1-020). In addition, the Applicants also submitted Review of Cumulative Effects Assessment and In-Combination Assessment at Deadline 2 (REP2-043). Backon Fall and Clifton Fields Solar Farm (Planning reference: 24/0414) was included and considered in the application, but was allocated to the incorrect council within Volume 1, Annex 5.5: Cumulative screening matrix and location plan (APP-039) and was therefore updated in REP1-020). It was concluded that there were no significant effects. With regard to Grange Farm Solar Farm (Planning reference: 22/0204 (EIA Screening) and 24/0541 (application)), the EIA Screening application was considered in the application with no significant effects reported. The full application (24/0541) was validated after the submission of the Transmission Assets application and was therefore subsequently included in the CEA update, Volume 1, Annex 5.5: Cumulative screening matrix and location plan (REP1-020). Further, this was considered within the Review of Cumulative Effects Assessment and In-Combination</p>



Reference	Written Representation Comment	Applicants' response
		Assessment at Deadline 2 (REP2-043) where it was concluded that there would be no significant effects.
REP2-070.6	Community and Traffic Concerns: The proposed cable route along Parrox Lane conflicts with the Clifton Farms solar project, causing heavy traffic, noise, dust, and pollution on a single-track road near Newton Marsh SSSI. Alternative access via Lower Lane, a busy route, will increase construction traffic, raising risks of accidents and disruption.	<p>The Applicants acknowledge Ms Abbott's concerns relating to potential traffic congestion and disruption.</p> <p>The Applicants have provided a response to these concerns at section 2.32 of The Applicants' Response to Relevant Representations Part 1 - Introduction and thematic responses (PDA-005). Subject to the grant of the DCO, the Applicants would note that the effects of construction traffic and highway works from Transmission Assets would be managed, monitored and controlled through the development of the detailed CTMPs. In compliance with Requirement 9 of Schedules 2A and 2B of the draft DCO (REP2-004), the detailed CTMPs would need to be agreed with the relevant highway authorities. In approving the detailed CTMPs the relevant highway authorities would apply their statutory duties under the Traffic Management Act, 2004 to ensure the "expeditious movement of traffic on the authority's road network".</p>
REP2-070.7	Fracking Legacy and Seismic Risks: The Fylde's history of fracking-induced seismic activity (e.g., 2019 2.9-magnitude earthquake) and complex geology with stressed faults heighten risks. Excavation near abandoned wells could trigger further tremors, methane leaks, or contamination, further compromising well integrity and groundwater safety.	The Applicants have committed via CoT04 (see Volume 1, Annex 5.3: Commitments Register (REP2-010)) to a detailed Pollution Prevention Plan (PPP) which will form part of the Code of Construction Practice. Detailed PPP(s) will be developed in accordance with the Outline PPP (APP-197) and includes details of breakout plans which would cover potential impacts from fracking legacy. Good practice guidance detailed in the Environment Agency's Pollution Prevention Guidance notes (including Pollution Prevention Guidance notes 01, 05, 08 and 21) or the latest relevant available guidance will be followed. The Applicants further note that this is secured by Requirement 8 of Schedules 2A and 2B of the draft DCO (REP2-004) which requires the detailed pollution prevention plan(s) to be prepared and provided to the relevant planning authority for approval before commencing the relevant stage of onshore or intertidal works. The Relevant planning authority will engage various consultees as appropriate. This Requirement ensures the detailed pollution prevention plans would be implemented as approved.
REP2-070.8	Groundwater and Air Pollution: Excavation risks releasing fracking fluids, radioactive materials (e.g., Thorium-232, radon), and volatile organic compounds (VOCs), posing health risks like cancer and respiratory issues. Elevated Thorium-232 readings near Preston New Road (May 2025) indicate potential radon issues, requiring independent investigation.	

Reference	Written Representation Comment	Applicants' response
REP2-070.9	Community Distrust and Mental Health: The Applicant's lack of transparency, inadequate mitigation, and poor consultation mirror past issues with Cuadrilla's fracking operations, which violated regulations and caused community distress. Residents fear renewed environmental damage, health risks, and seismic activity, reviving trauma from past infrastructure projects.	<p>The Applicants acknowledge Ms Abbott's concerns regarding mental health.</p> <p>The Applicants have previously addressed concerns relating to human health, including mental health at section 2.19 of The Applicants' Response to Relevant Representations Part 1 - Introduction and thematic responses (PDA-005). This confirms that an assessment of human health (including mental health) is contained in Volume 1 Annex 5.1: Human Health (APP-035) and outlines various measures aimed at ensuring the continued health and wellbeing of the local population and how these are secured through the draft Development Consent Order (REP2-004).</p> <p>The Applicants are committed to developing the Transmission Assets in a way that is sensitive to the environment, avoiding or minimising potential effects wherever possible. Impacts which have the potential to give rise to likely significant effects have been carefully assessed and appropriate mitigation identified throughout the Environmental Statement. Those measures are secured through the Requirements set out in Schedules 2A and 2B of the draft DCO (REP2-004). Mitigations are also set out in the updated Commitments Register (Annex 5.3: Volume 1 (REP2-010)) submitted at Deadline 2.</p>
REP2-070.10	Attached WRITTEN SUBMISSION RE MORGAN AND MORECAMBE OWFTA- Deadline 2 IPR: 20054040 Further to my submission via interested party number 35794 in January, and my verbal submissions in April 2025 plus a further written submission in May, I would like the Ex A to consider the following points: Summary: Liquid Ethylene pipeline. The Applicant has failed to consider or address the liquid ethylene pipeline which runs across the A583 and A584 close to farms and retail outlets. Liquid ethylene explodes spontaneously on contact with air and any damage to the pipeline poses an acute safety risk. If	<p>The Applicant notes this attachment and has responded to the points above, subject to the point below.</p> <p>The Applicants acknowledge the comments in regard to potential traffic congestion and disruption, in particular via Lower Lane Freckleton. The Applicants would however note that no construction traffic for the Transmission Assets is forecast to travel via Lower Lane. Details of proposed routes for construction traffic can be found at Figure 7.1 within Volume 3, Figures – Part 4 of 7 (APP-134).</p>



Reference	Written Representation Comment	Applicants' response
	<p>the pipeline is compromised, e.g through vibrations from drilling, the ethylene will escape through cracks causing immense danger to public safety, residential buildings, and businesses. If the Applicant had conducted robust preliminary investigations and a thorough Consultation, the LE pipeline would have been evident and a more suitable, less hazardous route identified, e.g. the Hill house Technology Enterprise Zone. Ecology Section 5.4 of EN-1 sets out requirements relating to biodiversity and geological conservation. The Ribble Estuary SSSI and adjoining Lytham St. Anne's Dunes SSSI support Sand Lizards which are a priority species, protected under the Wildlife and Countryside Act, 1981. The proposed development will significantly negatively impact these areas. No consideration is given to the timing, duration and frequency of works, the access management, the size, number and location of build infrastructure within these sensitive areas. 7.5 Section 5.4.22 of EN-1 specifically requires that NSIP proposals consider the move of mobile and migratory species. The Applicant has not provided proper information relating to impacts on birds and proposed mitigation and therefore, the ES and it's proposals do not meet the requirements of EN-1. Any attempt to balance the adverse impacts against the benefits of the scheme must be supported by the required information which the Applicant fails to provide. National Policy Statements EN-1, EN-3 and EN5 are predicated on balance and provisions for appropriate mitigation. Section 2.6.2 of EN-1 explains that sustainable development is relevant not just in terms of addressing climate change but also because the way energy infrastructure is deployed affects the wellbeing of the environment, society and the economy. The applicant is unable to explain how the infrastructure will be deployed and therefore information supplied is inadequate and lacking crucial detail.</p>	<p>The Applicants have provided a response in regard to the more general traffic comments at section 2.32 of The Applicants' Response to Relevant Representations Part 1 - Introduction and thematic responses (PDA-005).</p> <p>Subject to the grant of the DCO, the Applicants would note that the effects of construction traffic and highway works from Transmission Assets would be managed, monitored and controlled through the development of the detailed Construction Traffic Management Plans (CTMPs). In compliance with Requirement 9 of Schedules 2A and 2B of the draft DCO (REP2-004), the detailed CTMPs would need to be agreed with the relevant highway authorities.</p>

Reference	Written Representation Comment	Applicants' response
	<p>Transboundary Environmental Concerns A transboundary Environmental Impact Assessment (EIA) screening conducted by the UK identified potential impacts on Ireland, including effects on commercial fishing, fish and shellfish, marine mammals, and shipping and navigation. Cumulative impact of energy infrastructure Clifton Marsh Solar Development and Grange Farm Solar Farm propose to cover c259 acres. This is a very significant footprint for such small villages. The Springfields Nuclear Fuel Facility just outside of Clifton covers a further c205 acres. Community impacts in conjunction with other energy infrastructure works Clifton Farms solar project is proposed on agricultural land off Parrox Lane via A854. This is in direct conflict with The Applicants proposed cable route. Parrox Lane is a single track road used regularly by villagers for recreation and close to Newton Marsh SSSI. It is disturbing and upsetting for residents to suffer heavy traffic with land-take involving dust, noise and pollution within a rural village from two projects undertaken in such close proximity within a short space of time. The displacement of local wildlife and habitats on caused by the proposed works on high value agricultural land and close to an SSSI is likely be particularly concerning. It would require further consideration by the Applicant based on the cumulative effect of previous recent infrastructure works in close proximity. Grange Farms application was resubmitted due to objections by the LCC and County Council Highways Teams re access. Alternative access for the works is now proposed via Lower Lane, Freckleton village. This access route would cross the cabling route causing a huge increase in construction traffic for two energy projects down a small country road within a short space of time. Lower Lane runs off the A584. This is a busy, main route for BAE commuters and traffic to/from Preston city. Heavy traffic combined with HGV's/tankers</p>	

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	<p>will cause stress and chaos on the roads just outside Freckleton village and will increase the risk of traffic accidents. Fylde's hydraulic fracturing (fracking) legacy Over 50 seismic events and a 2.9-magnitude earthquake in 2019 and was linked to fracking at Preston New Road and led to a moratorium due to unpredictable seismic risks and community outcry. Between 2011 and 2019 fracking operations appear to have affected the land characteristics, particularly south of the Preston New Road drill pad and have continued to worsen. Land changes around local faultlines The Fylde has a complex geological structure with pre-existing faults. Research, such as a 2022 study in Petroleum Geoscience, noted that faults here were critically stressed and prone to slipping when subject to pressures. Further studies (e.g., Heriot-Watt, 2020) highlight complex faulting in the Fylde. Land sinking and becoming waterlogged, new areas of standing water, and areas of discolouration of soil, potentially from contaminants are visible along the fault trace south of Preston New Road, in close proximity to the proposed works Sediment staining can be seen in these areas also, which could be an indicator of water from the aquifer reaching the surface. LiDAR comparisons reveal a -12 cm of land depression (between 2018 and 2022) from Anna's road north to Preston New Road, following what is named the 'Wakepark' fault. Farmers have been observed installing new drainage in these areas in an attempt to alleviate the water and reclaim their fields. Groundwater and Surface Water Contamination Excavation near abandoned wells can compromise well integrity, leading to leaks of fracking fluids, flowback water, or naturally occurring substances like arsenic, barium, and radioactive materials into aquifers or surface water. Studies in Pennsylvania have linked shale gas development to groundwater contamination, with detectable levels of</p>	

Reference	Written Representation Comment	Applicants' response
	<p>fracking-related chemicals in public water supplies. If formation fluid migrates along the fault this could become a serious health hazard for human health and the food chain should toxins reach the surface. Very little is known about the behaviour of fracking fluids once in the ground. (The industry admits in official documents that they cannot account for up to 40% of the fluid.) Air Pollution: It is well documented that fracking can cause Naturally Occurring Radioactive Materials (NORM) to reach above the ground. An abandoned well exists on Anna's road and disturbing it through excavation, as in the proposed works, may release VOCs, hazardous air pollutants and radioactive particles into the air. Thorium-232 and its decay products, including radon, pose serious health risks due to their radioactivity. Exposure, particularly through inhalation of dust, can increase the risk of developing lung or bone cancer and other severe health problems (National Research Council). A Radiacode 103 gamma spectrometer at Prest revealed readings for Thorium 232 element that is mobilised by fracking operations and usually not found at the surface. Readings from publicly accessible locations in May 2025 close to the Preston New Road site revealed elevated doses of Thorium 232 up to 4 times the background levels. This may indicate that radon has become an issue in the vicinity. The proposed works require very careful consideration in light of these findings. It would necessitate further investigations by an independent competent professional. Please see Radiacode screen image below. A Harvard study found increased downwind radioactivity up to 12 miles from fracking wells, potentially linked to disturbed shale bedrock. Seismic Activity and Structural Risks: Excavation near abandoned wells could trigger further seismic activity particularly in the Fylde area which has a history of fracking-induced tremors. Within this area of complex geology, even shallow drilling can intersect</p>	

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	<p>minor faults, potentially causing localized seismic activity. A 2020 study in the Seismological Research Letters journal confirmed seismic events caused deformations in the Preston New Road well casing, raising concerns about potential leaks or structural failures. The Oil and Gas Authority (OGA) reported that such damage could increase risks of groundwater contamination or methane heightens health risks through water or air pollution. Excavation near the abandoned shale gas fracking wells could release methane, VOCs, and other toxic substances, leading to risks of cancer, respiratory issues, reproductive harm, and explosions. Groundwater and air contamination are primary concerns, with vulnerable populations like children, the elderly, and low-income communities at higher risk. Given the complexity and potential severity of these risks, any excavation in such areas should involve thorough environmental assessments and community engagement to protect public health and safety. The Applicant fails to address these concerns. The above information is important to consider in relation to the current proposal. While both very different energy production methods they share a fundamental commonality. A shared, deep concern about impacts on public health, environment and quality of life. Current sentiment Generally speaking, Fylde residents are understandably distrustful of companies who execute NSIP's and regulators, e.g. Cuadrilla violated regulations by breaching multiple planning conditions and failing to report well damage. This non-compliance and deviation from approved plans also raised concerns about regulatory oversight. The Applicants lack of transparency, insufficient detail, inadequate mitigation measures and failure to consult with residents adequately and address concerns raised, mirrors Cuadrilla's Application and approach and reinstates fear in Fylde residents of large scale energy infrastructure projects. The proposed plan sends warning</p>	

Reference	Written Representation Comment	Applicants' response
	signs to Fylde residents and has resurfaced a collective uncertainty, fear and anxiety with an anger that the Fylde, yet again, appear to be losers in the energy infrastructure field and that, yet again, the proposed works threaten residents health, environment and quality of life. The project's risks to public safety, the environment, and community wellbeing outweigh its benefits due to insufficient planning, consultation, mitigation methods and consideration of cumulative impacts	