

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

**Applicants' Response to South Ribble Borough Council Local Impact Report**



**Deadline: Deadline 3**  
**Application Reference: EN020028**

**Document Numbers:**  
**MRCNS-J3303-RPS-19112**  
**MOR001-FLO-CON-CAG-RPT-0091**

**Document Reference: S\_D3\_4**  
**F01**

**7 July 2025**

Document status					
Version	Purpose of document	Approved by	Date	Approved by	Date
F01	Deadline 3	HK	July 2025	PM	July 2025

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## Glossary

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

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

# **1 Applicants' response to South Ribble Borough Council Local Impact Report at Deadline 3**

## **1.1 Introduction**

- 1.1.1.1 This document has been prepared in response to the Local Impact Report from South Ribble Borough Council (REP1-227) submitted to the Examining Authority at Deadline 1 and published on the National Infrastructure Planning project webpage following Deadline 2.
- 1.1.1.2 South Ribble Borough Councils' comments and the Applicants' response are presented in section 2.1.

## 2 Responses to Local Impact Report

### 2.1 South Ribble Borough Council – Local Impact Report (LIR)

Table 2.1: REP1-227 – South Ribble Borough Council

Reference	Written Representation Comment	Applicants' response
REP1-227 1.1	<i>Introduction</i> Following the preliminary meeting held on 29 April 2025, the examining Authority wrote to South Ribble Borough Council setting out the procedural decisions made in respect of the forthcoming Examination into the application.	The Applicants note this comment.
REP1-227 1.2	This document is the Local Impact Report (LIR) for SRBC, in accordance with the advice and requirements set out in the Planning Act 2008 (as amended) as, 'a report in writing giving details of the likely impact of the proposed development on the authority's area (or any part of that area)'.	The Applicants note this comment about the purpose of this LIR.
REP1-227 1.3	In preparing this LIR the local authority has had regard to the DCLG's Guidance for the examination of applications for development consent (2015), the Planning Inspectorate's Advice Note One, Local Impact Reports (2012) and Government Guidance 'Nationally Significant Infrastructure Projects: Advice for Local Authorities' (2024). The LIR relates only to the onshore elements and identifies the most relevant policies and the main issues the Council has concerns over.	The Applicants note the guidance used to prepare this LIR.



Reference	Written Representation Comment	Applicants' response
REP1-227 2.1	<p><i>Site Description</i></p> <p>The Morgan substation site is located between Kirkham and Freckleton, south of the A583 Kirkham Bypass and east of Hall Cross. It is north of the Morecambe substation site and surrounded by Lower Lane, Greenbank Farm, and Freshfield Farm to the west, HM Prison Kirkham to the northwest, and Newton-with-Scales to the east. The site slopes gently eastward from approximately 16 meters above ordnance datum (AOD) to around 6.5 meters AOD at Dow Brook. It is irregularly shaped, delineated by field boundaries and Dow Brook, and currently used for cattle grazing. A public bridleway (BW0505016) runs west of the site from Hall Cross to Freckleton.</p>	The Applicants note the description of the area around the Morgan onshore substation.
REP1-227 2.2	<p>The Morecambe substation site is situated south of the Morgan substation site, east of Lower Lane, and north of Freckleton. A public bridleway and Dow Brook run to the east of this relatively flat site, which ranges from 9 to 12 meters AOD.</p>	The Applicants note the description of the area around the Morecambe onshore substation.
REP1-227 2.3	<p>The offshore elements of the Transmission Assets are located in the east Irish Sea within English offshore and inshore waters, while the onshore elements are within the local authority areas of Fylde Council, Blackpool Council, South Ribble Borough Council, Preston City Council, and Lancashire County Council.</p>	The Applicants note the description of the location of the Transmission Assets.
REP1-227 2.4	<p>The proposed onshore substations and sections of the onshore export cable corridor would be located within the Warton to Kirkham Green Belt, and the 400 kV grid connection cable corridor would be within the South Ribble Green Belt.</p>	The Applicants note this comment regarding the areas of Green Belt.

Reference	Written Representation Comment	Applicants' response
REP1-227 2.5	<p>The Transmission Assets are set within a diverse landscape that includes urban areas with historic industrial buildings juxtaposed with agricultural areas. This landscape features marginal upland pastures, extensive grasslands, wooded river corridors of the Ribble Valley, arable fields of the Fylde, and drained horticultural landscapes of the mosslands. Lancashire's landscape is characterized by long views and inter-visibility between various landscape types, contrasting with the intimate and undulating countryside around the substation. Settlement patterns include clusters of 18th and 19th century red brick farm buildings and rural villages, influenced by 20th-century development. Enclosed coastal marshes and intertidal flats, particularly around the Ribble, Lune, and Wyre estuaries, are valued for their beauty and prolific birdlife.</p>	<p>The Applicants note the response. The existing landscape character of the Transmission Assets is set out in Section 1.3 of Volume 3, Annex 10.2: Landscape character baseline technical report (APP-125).</p>
REP1-227 3.1	<p><i>Details of the proposal</i></p> <p>The application for development consent for the Transmission Assets includes the following:</p> <ul style="list-style-type: none"> <li>• Morgan Offshore Wind Project: Transmission Assets – the offshore export cables, landfall and onshore infrastructure required to connect the Morgan Offshore Wind Project to the National Grid; and</li> <li>• Morecambe Offshore Windfarm: Transmission Assets - the offshore export cables, landfall and onshore infrastructure required to connect the Morecambe Offshore Windfarm to the National Grid</li> </ul>	<p>The Applicants agree with this summary description of the Transmission Assets. The scope of the SRBC Statement of Common Ground (SoCG) will reflect the specific locations of interaction between the Transmission Assets and SRBC.</p>



Reference	Written Representation Comment	Applicants' response
REP1-227 3.2	<p><i>The Project will comprise both permanent and temporary infrastructure including, but not limited to:</i></p> <ul style="list-style-type: none"> <li><i>Offshore infrastructure including offshore export cables, offshore substation platform(s), interconnector cables and a Morgan offshore booster station.</i></li> <li><i>Landfall works (where the offshore cables reach the shore) between Mean Low Water Springs and the transition joint bays including the offshore and onshore cables, intertidal working area and landfall construction compound(s), and temporary and permanent access.</i></li> <li><i>Onshore infrastructure from the transition joint bays to the electricity transmission network connection. This includes onshore export cables to the two new substations, temporary construction compounds, temporary and permanent access, and onward connections to the existing National Grid substation at Penwortham, Lancashire.</i></li> <li><i>Areas for biodiversity net gain, enhancement and / or mitigation, including permanent access for operation and maintenance of those areas.</i></li> </ul>	The Applicants acknowledge this description, as per paragraph 3.1.1.4 of Volume 1, Chapter 3: Project description (REP2-008).
REP1-227 3.3	The two offshore wind farms are expected to make a key contribution to the UK's target of generating 50GW of power from offshore wind by 2030. Combined they have the potential to generate almost 2GW of electricity – enough to power the equivalent of around two million homes.	The Applicants confirm that this is noted within paragraph 1.13.1.5 of Volume 4, Chapter 1: Climate change (APP-138).

Reference	Written Representation Comment	Applicants' response
REP1-227 4.1	<i>Policy Context</i> Relevant planning policy and legislation considered in the determination of the application is summarised in a table in section 4.1	The Applicants note this comment regarding policy context.
REP1-227 5.1	<i>Impacts of the proposal</i> South Ribble Borough Council recognizes the importance of renewable energy to provide a sustainable future, offering environmental, economic and social benefits which contribute to a healthier planet and more resilient energy system. It is also recognised that legislation and updated policy (detailed in section 4) seeks to significantly expand in offshore wind farms, aiming to provide high-capacity energy solutions whilst minimising land use. The council acknowledges the national benefits of the project in contributing to renewable energy targets and fostering sustainable economic growth. However, weight must also be placed on achieving these goals without causing significant harm to the local built and natural environment, local communities or tourist economy. The council notes that engagement from the applicants has been limited following the draft stage and a fixed approach was concluded without consultation however, the council remains committed to working closely with the applicants and their consultees to resolve concerns highlighted below and any other that may arise from further work.	The Applicants note this comment regarding the benefits of the Transmission Assets in contributing to national renewable energy targets but this is balanced against potential adverse effects. In response to the comments regarding consultation, the Applicants have undertaken a number of non-statutory consultations, alongside statutory consultations in accordance with the Planning Act 2008. A range of consultation events were held in the vicinity of the proposed Transmission Assets, including online events, exhibitions and pop-up events between November and December 2022, April and June 2023, and October and December all of which were advertised and available for SRBC, other Councils and members of the public to attend. Further details can be found in the Consultation Report (APP-170). In addition, SRBC were also invited to attend technical consultation, as part of the Evidence Plan Process within Expert Working Groups, undertaken to inform the information, evidence and assessment methodologies and approaches taken for Environmental Impact Assessment (EIA). This is set out within the Technical Engagement Plan (APP-189) and its appendices (APP-190 and APP-191). The Applicants are also committed to working with SRBC and other stakeholders to resolve the concerns raised in this LIR and other representations.
REP1-227 5.2	<u>Principles of Development, Site Selection and Alternatives</u> The council raises concerns that the site selection and consideration of alternatives replies heavily upon the	The Applicants have undertaken a robust process of site selection and refinement to determine the routing and placement of the Transmission Assets infrastructure through from inception to DCO submission, which is detailed in Volume 1, Chapter 4: Site Selection and Alternatives (AS-026).

Reference	Written Representation Comment	Applicants' response
	high-level justification provided by the Environmental Statement, specifically F1.4 Volume 1, Chapter 4 [the SSES]. This sets out the rational for connecting the Morgan Offshore Wind Project to the National Grid, yet details of the generation assets suggested for connection at Penwortham are not considered to be fully justified.	
REP1-227 5.3	<p>The iterative site selection process undertaken by the applicant is acknowledged in order to considered local alternative locations for infrastructure and routing, however this is noted to be isolated to the local area with an offshore search extent of Formby to Blackpool with the only requirement being a connection to the national grid transmission at Penwortham. This did not afford a wider extent to be fully explored to ensure the solution that is to be delivered is the most appropriate having regard to impacts on communities, business, tourism and farmland, and damage to ecology/landscape/archaeology as well as cost. It is recognised that some alternative sites were assessed part of NESO, such as connection to the Stanah substation which was not supported due to the need for a new substation and impact on residential/recreational surroundings and associated time and cost. However, it is still considered that other opportunities, for example, connection into existing overhead infrastructure to the north which directly link to Penwortham have not been fully assessed or justified as to why these options are unsuitable.</p>	<p>The Applicants would direct SRBC to their detailed response to this point in section 3.5 of REP1-0039. The Stanah substation is, like the Penwortham substation, part of the NETS (i.e. the transmission network owned by NGET) as are the existing overhead lines connecting the two. All are part of NGET's undertaking and subject to the terms of its transmission licence. Importantly, any form of alternative Point of Interconnection into the NETS which is proposed, whether directly into the Stanah substation or somehow into the NGET overhead line between Stanah and Penwortham, would be a change to the Point of Interconnection for the projects (identified by NESO in the HND and secured in connection agreements with NESO). In other words, a physical connection which amounts to a new 'Tee-in' to NGET's existing overhead line between Stanah and Penwortham, or adding new conductors to it (if that were possible), would be a new and different Point of Interconnection to the identified and now contracted connection directly into the Penwortham substation itself.</p> <p>Although a question for NESO and NGET, the Applicants note that as set out in NGET's "User connection configurations" guidance (21 June 2024), NGET generally no longer supports individual, tee-in [or LILO] connections into its overhead transmission lines. These bespoke connections would involve diverting an existing overhead line to serve a new connection point or substation and are unsupported by NGET on the basis that (1) they are neither economically nor operationally efficient, (2) they can increase the complexity and vulnerability of the network (creating potential single points of failure or faults on the exiting circuit), (3) they require bespoke engineering, outages and disproportionate resources, and (4) they do not</p>

Reference	Written Representation Comment	Applicants' response
		<p>meet the standards of reliability and resilience required for new transmission infrastructure. Therefore, any suggestion of a new Point of Interconnection via a tee-in [or LILO] to the overhead line between Stanah and Penwortham would be inconsistent with current transmission network guidance.</p> <p>As such, it is the Applicants' position that the suggestion that the Point of Interconnection for the Transmission Assets should have been at or around Stanah or into existing overhead lines, instead of at the Penwortham substation, would be a change to the Pol and therefore a matter for NESO (in consultation with NGET) as part of the HND and subsequent connection offer process.</p>
REP1-227 5.4	<p>Whilst the rationale behind the approach to seek connection to the National Grid at Penwortham is acknowledged, the principle of development for the generation assets has not been established and there will be cross-cutting impacts between the generation and transmission elements which must be considered. The cumulative assessment set out within Section 5.4.9 within Volume 1, Chapter 5: Environmental assessment methodology (APP-034) considered the generation assets in isolation with the transmission assets as argued that assets cannot be consented insulation from generation assets. However, the Council remains concerned that the overlapping impacts has not been fully assessed.</p>	<p>The principle of the Generation Assets of both Morgan and Morecambe, as nationally significant infrastructure projects, is described in the Statement of Reasons (REP1-012).</p> <p>The Applicants have undertaken a full cumulative assessment as set out within Volume 1, Chapter 5: Environmental assessment methodology (APP-034). Section 5.4.9 sets out how the Transmission Assets have been assessed with the respective Generation Assets.</p>
REP1-227 5.5	<p>The Holistic Network Design Review produced in accordance with National Energy System Operator (NESO)) recommended Morgan and Morecambe wind farms have radial connections with a shared cable</p>	<p>The Applicants have set out their approach to route planning and site selection for the landfall, offshore and onshore export cable corridor and onshore substations within Volume 1, Chapter 4: Site Selection and Consideration of Alternatives (AS-026) and its supporting annexes (which</p>

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	corridor. It was considered that the shared onshore and offshore cable corridor and landfall would minimise the impact of the cables on the environment and local community. It is acknowledged that this approach is in line with the applicant's proposal however concerns remain as to the weight afforded to NESO advice and whether it should be assumed to outweigh alternatives, where those alternatives would be more suitably sited when assessed against the Development Plan and any development which may thereafter be affected by proposed generation assets. As such, as presented, it is considered that there remain deficiencies with that proposed as other alternative options have not been fully considered or reviewed, and the principle of development cannot be satisfactorily balanced.	was carried out independently of the HND). The Applicants would direct SRBC to their detailed response regarding site selection, grid point of interconnection, and the HND in REP1-0039.
REP1-227 5.6	<u>Potential Offshore Environmental Effects</u> The Council considers that matters relating to offshore environmental effects will largely be addressed by other bodies, notably Natural England and the Marine Management Organisation.	The Applicants note that South Ribble Borough Council consider offshore matters to be dealt with by other statutory stakeholders.
REP1-227 5.7	<u>Potential Onshore Environmental Effects</u> • <i>Onshore ecology, nature conservation and intertidal ornithology</i> As the final design details of the Transmission Assets are not yet determined, it is not possible for the applicant to identify problems arising from the development when there is no conclusion as to what the final scheme will be. Until sufficient details of the 400kv corridor route and onshore infrastructure is made available, the council remains concerned that the proposed development	The Applicants refer to the Maximum Design Scenario in Table 3.21 in Chapter 3: Onshore ecology and nature conservation (APP-075) and Table 4.20 in Volume 3 Chapter 4: Onshore and intertidal ornithology (APP-090). The approach adopted represents the worst-case scenario, used to determine the potential impacts in accordance with standard CIEEM guidance. With respect to ecological mitigation, the Applicants have identified a range of measures that are presented in the Outline Ecological Management Plan (OEMP) (REP2-018). The Outline Ecological Management Plan is secured by Requirement 12 of Schedule 2A & 2B of the draft DCO (REP2-004).

Reference	Written Representation Comment	Applicants' response
	would provide appropriate ecological improvement or satisfy that alternative sites could not provide better ecological improvement.	Detailed Ecological Management Plan(s) will be implemented as approved by Requirement 12 of Schedule 2A & 2B of the draft DCO (REP2-004).
REP1-227 5.8	Further information is required in relation to the management and restoration of peat during the construction process. In addition to acting as a significant carbon store, peat can support important habitats, and, in some cases, restorable peat could be considered to be an irreplaceable habitat because of its integral role in supporting important rare habitats. At present, the level of information provided does not provide sufficient reassurances that impacts on peat can be adequately avoided, mitigated or compensated. A more comprehensive Peat Management Plan should be required to be developed.	<p>As shown in Volume 3, Annex 6.2: Agricultural land classification survey results (APP-106), the soil auger boring surveys have identified limited areas of peat within the Onshore Infrastructure Area. In addition, the soil survey work also found that peat resources identified in the Soil Survey of England and Wales mapping (see Table 6.5 of Volume 3, Annex 6.2: Agricultural land classification survey results (APP-106)) have been subject to significant wastage over the 60 year period since the original mapping was undertaken in the late 1960s as intensive agricultural management of these soils has continued. However, Section 1.7.6 of the Outline Soil Management Plan (APP-200) includes several commitments to manage potential impacts of the Transmission Assets on peat within the Onshore Order Limits, where these cannot remain in situ during the construction phase. These could include, where required:</p> <ul style="list-style-type: none"> <li>• additional peat probing surveys to determine the extent and depth of peat to be affected;</li> <li>• additional measures to ensure the effective handling, storage and reinstatement of peat during the construction phase;</li> <li>• the preparation of appropriate Peat Management Plans PMP(s) as part of the detailed SMP(s) which will be submitted for approval by the relevant local authorities prior to the commencement of construction, as secured under Requirement 8 of Schedules 2A &amp; 2B of the draft DCO (REF)</li> </ul> <p>In addition to the ALC and soil surveys reported in Volume 3, Annex 6.2: Agricultural land classification survey results (APP-106), peat resources were also considered in Volume 3, Chapter 1: Geology, hydrogeology and ground conditions (APP-068), Volume 3, Chapter 3: Onshore ecology and nature conservation (APP-075) and Volume 3, Chapter 5: Historic</p>



Reference	Written Representation Comment	Applicants' response
		environment (APP-096). Taking the above information into account, it is considered that sufficient information has been provided with respect to peat resources within the study area to determine the likely significant effects of the Transmission Assets and inform mitigation requirements reported in Volume 3, Chapter 6: Land use and recreation (APP-104) and the Outline Soil Management Plan (APP-200).
REP1-227 5.9	The council are also concerned that some ecological receptors which are either not considered to be fully assessed or have insufficient mitigation/compensation measures identified within the Environmental Statement and secured within the draft Development Consent Order (DCO). These include the impact on bats, hedgerows, wood and trees (including their removal) both prior to and during construction as well as little acknowledgement of local ecological designations and features of interest. The council also notes that limited information has been provided on the likely impact on farmland which surrounds the proposal site.	<p>The Applicants refer SRBC to their previous response on this matter in REP1-227 5.7.</p> <p>In accordance with CIEEM guidelines on ecological impact assessment (CIEEM, 2018), impacts were assessed on Important Ecological Features (IEFs). The parameters for defining IEFs that were scoped into the ecological impact assessment are set out in Section 3.6.4 of Volume 3, Chapter 3: Onshore ecology and nature conservation (APP-075). Arable farmland was not identified as an IEF within Volume 3, Chapter 3, as described further below.</p> <p>The IEFs that were scoped in to the assessment (including on bats, ancient woodland, trees and veteran trees, Deciduous Woodland Priority Habitat, Hedgerow Priority Habitat, and local ecological designations) is set out in Section 3.9.4 of Volume 3, Chapter 3: Onshore ecology and nature conservation (APP-075).</p> <p><b>Important Ecological Features not taken forward into the assessment (arable farmland)</b></p> <p>In assessing the value of habitats or species populations to establish whether they met the criteria for IEF, a subjective assessment was made, based on a range of factors that influence overall ecological value including rarity, extent, diversity, recoverability, position in the landscape and naturalness, as stated in paragraph 3.10.2.2 of Volume 3, Chapter 3: Onshore ecology and nature conservation (APP-075). Arable farmland is not rare and is a habitat that was recorded as common and widespread</p>

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		<p>within the Survey Area (see Table 1.5 in Volume 3, Chapter 3 Annex 3.3: Phase 1 habitat, national vegetation classification and hedgerow survey technical report (APP-077)), occupying approximately 14.26% of the habitats within the Onshore Order Limits. This is a heavily modified habitat type due to its agricultural cultivation (requiring the application of pesticides) and thus of low ecological diversity and is reasonably considered to be readily able to be reinstated post-disturbance. Arable habitat was therefore not evaluated to meet the threshold for an evaluation of county level importance or higher that would identify it as an IEF (see rationale in Section 3.6.4 of Volume 3 Chapter 3: Onshore ecology and nature conservation (APP-075)). Therefore the potential impacts of the projects on this habitat were not assessed, in accordance with standard CIEEM guidance.</p> <p>Signposting to, and summary of, impact assessment sections for bats, ancient woodland, veteran trees, trees, deciduous woodland priority habitat, hedgerow priority habitat and local designations</p> <p><i>Impacts on bats</i></p> <p>The assessment of potential impacts of construction, operation and decommissioning on bats is presented in section 3.11.11 and summarised in Table 3.43 of Volume 3 Chapter 3: Onshore ecology and nature conservation (APP-075). With mitigation for temporary and permanent habitat loss and habitat fragmentation / isolation / disturbance secured through the outline Ecological Management Plan (REP2-018), effects were assessed as not significant.</p> <p><i>Impacts on ancient woodland</i></p> <p>The assessment of potential impacts of construction, operation and decommissioning on ancient woodland is presented in section 3.11.8 and</p>

Reference	Written Representation Comment	Applicants' response
		<p>summarised in Table 3.38 of Volume 3 Chapter 3: Onshore ecology and nature conservation (APP-075). It was concluded that there would be no direct impacts on ancient woodland, and potential indirect effects (contamination, spread of invasive species and changes in air quality from emissions) were assessed as not significant.</p> <p><i>Impacts on veteran trees</i></p> <p>The assessment of potential impacts of construction, operation and decommissioning on veteran trees is presented in section 3.11.9 and summarised in Table 3.39 of Volume 3 Chapter 3: Onshore ecology and nature conservation (APP-075). No significant effects are predicted to the one veteran tree (pedunculate oak in hedgerow at Howick Hall Wood) within the Onshore Order Limits. The Applicants have made a commitment (CoT03 as set out in Volume 1, Annex 5.3 – Rev F03 (REP2-010)) to the avoidance and protection of the veteran tree. This is secured through the Works Plans – Onshore and Intertidal.</p> <p><i>Impacts on trees</i></p> <p>The loss of trees in relation to onshore ecology nature conservation IEFs has been assessed in Chapter 3 in relation to deciduous woodland priority habitat, hedgerows and bats. The number of trees to be lost within the Onshore Order Limits is quantified in Section 1.10 of Volume 3 Annex 10.5: Tree survey and arboricultural impact assessment (APP-128) as 41 individual trees (37 at the onshore substations and four at the access roads/compounds), 22 tree groups for removal/partial removal (10 groups at the onshore substations, eight groups at the onshore cable route and four groups at the access roads/compounds) and 69 hedgerows for removal/partial removal (11 at onshore substations, 41 at the onshore cable route and 17 at access roads/compounds). The installation of the onshore cables will result in minimal tree loss due to micro-siting. During detailed</p>

Reference	Written Representation Comment	Applicants' response
		<p>design, options would be explored to limit conflicts within the identified Root Protection Areas and maximise tree retention. In accordance with CoT13, sections of hedgerows and trees which are removed will be replaced using like for like hedgerow species, as secured by Requirement 12 of Schedules 2A &amp; 2B of the draft DCO (REP2-004).</p> <p><i>Impacts to Deciduous Woodland Priority Habitat</i></p> <p>The assessment of potential impacts of construction, operation and decommissioning on deciduous woodland priority habitat is presented in section 3.11.10 and summarised in Table 3.41 of Volume 3 Chapter 3: Onshore ecology and nature conservation (APP-075), and no significant effects are predicted. Table 3.40 states that 1.32 ha of deciduous woodland will not be affected, 0.03 ha will be temporarily lost, and 0.08 ha will be permanently lost. As shown on Figures 1.4 to 1.11 in the Phase 1 habitat, national vegetation classification and hedgerow survey technical report (APP-077), most of the woodland within the Order Limits and buffer would be avoided, and trenchless crossing methods would be used to cross the priority woodland habitat at Mason's Wood BHS. In accordance with CoT13, sections of hedgerows and trees which are removed will be replaced using like for like hedgerow species, as secured by Requirement 12 of Schedules 2A &amp; 2B of the draft DCO (REP2-004).</p> <p><i>Impacts to Hedgerow Priority Habitat</i></p> <p>The <b>assessment of potential impacts of construction, operation and decommissioning</b> on hedgerow priority habitats <b>is presented in section 3.11.10 and summarised in Table 3.41 of Volume 3 Chapter 3: Onshore ecology and nature conservation (APP-075), and no significant effects are predicted. The permanent loss of hedgerows is predominantly associated with construction of the Morgan and Morecambe onshore substations</b> The Applicants propose to provide new hedgerow of high</p>

Reference	Written Representation Comment	Applicants' response
		<p>ecological value to account for this permanent loss. This would be included as part of the Detailed Ecological Management Plan (CoT104 of Volume 1, Annex 5.3 – Rev F03 (REP2-010)). This would be secured by Requirement 8 within Schedules 2A &amp; 2B of the draft Development Consent Order (REP2-004). Detailed CoCP(s) will be implemented by the Applicants as approved by the relevant planning authority in which the works are situated in consultation with stakeholders, as appropriate. <b>All other hedgerow loss would be temporary and reversible.</b> In accordance with CoT13, sections of hedgerows and trees which are removed will be replaced using like for like hedgerow species, as secured by Requirement 12 of Schedules 2A &amp; 2B of the draft DCO (REP2-004).</p> <p><i>Local ecological designations</i></p> <p>Thirteen local ecological designations within the Onshore Order Limits were evaluated as being of county importance and identified as IEFs; assessment of the potential impacts of construction, operation and decommissioning on these IEFs is presented in section 3.11.6 and summarised in Table 3.32 of Volume 3 Chapter 3: Onshore ecology and nature conservation (APP-075). The local designations scoped into the assessment were:</p> <ul style="list-style-type: none"> <li>• Lytham St Annes Dunes LNR;</li> <li>• Lea Marsh BHS;</li> <li>• Lytham Foreshore Dunes and Saltmarsh BHS;</li> <li>• Masons Wood BHS;</li> <li>• River Ribble Lower Tidal Section BHS;</li> <li>• Savick Bridge BHS;</li> <li>• St Anne's Old Links Golf Course and Blackpool South Railway Line BHS;</li> </ul>

Reference	Written Representation Comment	Applicants' response
		<ul style="list-style-type: none"> <li>• Lytham Moss BHS;</li> <li>• Freshfield Farm Pond North BHS;</li> <li>• Freshfield Farm Pond South BHS;</li> <li>• Mill Brook Valley BHS;</li> <li>• Howick Hall Ponds BHS; and</li> <li>• Westby Claypits BHS.</li> </ul> <p>Of the above, part of the River Ribble Lower Tidal Section, Howick Hall Ponds and Mill Brook Valley BHS's are within South Ribble Borough Council's jurisdiction.</p> <p>Compensation for the loss of Freshfield Farm Pond South BHS and Freshfield Farm Pond North BHS will be delivered on land close to Morgan onshore substation, and therefore residual effects were assessed as not significant. With mitigation to minimise impacts through micro-siting, the assessment concluded that there would likely be significant adverse effects to Mill Brook Valley BHS due to the temporary habitat loss for the construction compound(s). The Applicants have made a commitment (CoT44 of Volume 1, Annex 5.3 – Rev F03 (REP2-010)) to install the offshore export cable beneath Lytham St Annes SSSI and the St Annes Old Links Golf Course via direct pipe and the exit pits will be located at least 100 m seaward of the western boundary of the SSSI. This would be secured by Requirement 8 within Schedules 2A &amp; 2B of the draft Development Consent Order (REP2-004). Detailed CoCP(s) will be implemented by the Applicants as approved by South Ribble Borough Council in consultation with stakeholders, as appropriate. In addition, the Applicants have made a commitment (CoT41 and CoT128 of Volume 1, Annex 5.3 – Rev F03 (REP2-010)) to undertake a detailed hydrogeological risk assessment to mitigate potential impacts to the hydrologically dependant surface water features of the sand dune system. In addition, the assessment(s) will be used to inform the detailed site specific crossing</p>



Reference	Written Representation Comment	Applicants' response
		design for the installation of the offshore export cables beneath Lytham St Annes SSSI. This would be secured by Requirement 8 within Schedules 2A & 2B of the draft Development Consent Order (REP2-004). Detailed CoCP(s) will be implemented by the Applicants as approved by South Ribble Borough Council in consultation with stakeholders, as appropriate. With these measures in place along with further (secondary) mitigation, effects on Lytham St Annes Dunes SSSI and St Anne's Old Links Golf Course and Blackpool South Railway Line BHS were assessed as not significant.
REP1-227 5.9	The site is located within the Ribble and Alt Estuaries SPA/Ramsar, and it is considered that further proposals are required to ensure that impacts on notable bird species associated with the designated sites where landfall occurs within and close to the intertidal zone can be avoided and/or successfully mitigated. This would include (not limited to) restrictions on times of working and the extent of the working areas.	The Applicants are continuing to engage closely with Natural England regarding potential impacts in the intertidal zone. Additionally, The Applicants have updated their commitment to avoid conducting works in the intertidal zone during the period from November to March. This commitment is documented in the CoT 110. in Volume 1, Annex 5.3: Commitments Register (REP2-010).
REP1-227 5.10	The submission of an Ecological Management Plan and Biodiversity Benefit Statement are acknowledged but noted to require further details if the scheme is permitted. The Biodiversity Benefit Statement refers to habitat creation and enhancement as 'indicative' rather than confirmed. The council argue that these issues should be submitted during the examination, to provide the necessary level of reassurance that ecological impacts will be able to be mitigated and/or compensated, and ecological enhancement achieved, before any permission is granted to the proposals. Details should include land ownership and management information, and bodies responsible for future management and	<p>The Applicants refer South Ribble Borough Council to their response in REP1-227 5.7.</p> <p>A revised version of the Outline Ecological Management Plan was submitted at Deadline 2 (REP2-018) which provided additional information regarding mitigation measures proposed at each of the individual mitigation areas. This is secured via Requirement 12 of Schedules 2A and 2B of the draft DCO (REP2-004).</p> <p>The Applicants reiterate that there is currently no legal requirement to provide for biodiversity net gain with applications for development consent under the Planning Act 2008, and that the Transmission Assets are exempt from any future legal requirement as the requirement will not apply retrospectively to applications made before the provisions come into force. Thus the Onshore Biodiversity Benefit Statement (REP2-020) has been put</p>

Reference	Written Representation Comment	Applicants' response
	monitoring of ecological mitigation and enhancement areas.	forward to provide biodiversity benefit measures on a voluntary basis. As these measures are not legally required, and are not required in order to mitigate any environmental impacts identified through the EIA, the Applicants have not included a Requirement in the draft DCO to deliver those biodiversity benefit measures. The Applicants are however committed to delivering those measures where they are able to acquire the land and rights to do so.
REP1-227 5.11	With regards to delivery of enhancements and net gains for biodiversity, it is really important that within the impact assessment process (and beyond) that different measures are clearly identified as mitigation or compensation, and that any ecological enhancements/net gains can be justified as additional measures. Demonstration of the Good Practice Principles for net gain should be demonstrated through this project, which include application of mitigation hierarchy (Principle 1) and additionally (Principle 7). Whilst it is acknowledged that the statutory requirement to provide at least a 10% gain in biodiversity may not apply to the project, nevertheless the scheme should aim to deliver a meaningful improvement to biodiversity. To this end there should be further consideration of the need for habitat creation and enhancement efforts to contribute to the creation of coherent nature recovery networks in South Ribble.	Mitigation measures are contained within the Outline Ecological Management Plan (REP2-018) and details of biodiversity benefit are included in the Outline Biodiversity Statement (REP2-020). Further, the environmental mitigation areas are identified in B8 Works Plans - Onshore and Intertidal Part 1 of 2 and Part 2 of 2 (AS-016 and AS-017) as Work Nos 35A/35B and 49A/49B and the biodiversity benefit areas identified as 20A/20B, 22A/22B and 44A/44B.
REP1-227 5.12	The impacts on this sensitive area will be long lasting and as such, significant weight must be afforded to the impact on ecology, nature conservation and intertidal ornithology. The council argues that the information provided does not fully demonstrate that the cumulative	The Applicants note SRBC's comments and will proactively engage with them on this. The Applicants confirm that a cumulative assessment of intertidal ornithology impacts within a 1 km radius has been undertaken, which is considered both proportionate and consistent with other offshore wind farms (e.g., Hornsea 3, Outer Dowsing and Mona Offshore Wind

Reference	Written Representation Comment	Applicants' response
	impacts of the proposals in relation to recent and planned development pressures along the route of the transmission assets have been comprehensively assessed. Consequently, it is concluded that insufficient information has been provided at this stage regarding the location and design of the Transmission Assets to inform the assessment of likely significant effects on onshore ecology and nature conservation receptors, including the identification of and commitment to providing appropriate mitigation and monitoring requirements.	Farm). Furthermore, the Applicants note that this assessment approach was not objected to during the scoping stage or on the statutory consultation on the Preliminary Environmental Information Report. The Applicants further confirm that they are engaged in ongoing consultation with Natural England concerning potential impacts upon the intertidal zone of the Ribble and Alt Estuaries Special Protection Area (SPA). Moreover, the Applicants draw attention to the updated commitment to avoid undertaking any works within the intertidal zone between November and March, as set out in the Commitments Register (CoT 129 as set out in Volume 1, Annex 5.3 – Rev F03 (REP2-010)), which serves to further mitigate any potential adverse effects arising from the Transmission Assets.
REP1-227 5.13	<ul style="list-style-type: none"> <li><i>Historic environment</i></li> </ul> <p>The Council notes that the results of the program of geoarchaeological deposit modelling (APP-096 table 5.4) is yet to be provided and requests that this is provided in sufficient time to allow proper review. APP-096 section 5.16 and table 5.17 set out that with regards to potential loss or harm affecting buried archaeological remains, that no further mitigation beyond existing commitments and no monitoring are proposed. With reference to APP-101 (and for example section 1.3.4.5), it is not clear to the Council what the referenced existing commitments are and how the baseline evidence supports the conclusions.</p>	The Applicants refer SRBC to the Applicants' responses to 2027.11 and 2027.12 in Procedural deadline A Submission - Annex 3.2.19 to Response to RR – South Ribble Borough Council (RR-2027) (PDA-026).
REP1-227 5.14	Given the wider Penwortham area, it is possible that there is archaeological potential in areas to be affected by the development, but as details of onshore connection infrastructure is as yet unknown, the Council remains unsure as to how these impacts have been assessed,	The Applicants refer SRBC to the Applicants' response to 2027.13 in Procedural deadline A Submission - Annex 3.2.19 to Response to RR – South Ribble Borough Council (RR-2027) (PDA-026).

Reference	Written Representation Comment	Applicants' response
	and considers the information provided to falls short of the level of detail required by the Council's Archaeologists.	
REP1-227 5.15	Whilst APP-096 section 5.11.3.1 refers to the possibility that onshore works 'could' harm the heritage significance of designated heritage assets – in South Ribble's case primarily Hesketh Farm (Grade II), although other more remote assets are listed (Annex 5.1) a full assessment of any impact on heritage assets setting cannot be made until such time as details of National Grid connection assets proposed for Penwortham are confirmed. The assessment argues that Hesketh Farm (Grade II) has limited heritage significance however this is not agreed by the Council. The final scheme will be required to justify the 'harm' caused to the heritage significance of the listed building and it is not considered that this has not been adequately provided at this stage.	<p>The Applicants refer SRBC to the response to 2027.14 in Procedural deadline A Submission - Annex 3.2.19 to Response to RR – South Ribble Borough Council (RR-2027) (PDA-026).</p> <p>The Applicants' assessment of likely impacts and effects in respect of listed buildings is presented in ES Volume 3, Annex 5.5: Settings assessment (APP-102). Paragraphs 1.9.2.1 to 1.9.2.23 address the likely impacts and effects during construction in respect of the Grade II listed Hesketh Farmhouse. The former farmhouse is ascribed a medium level of sensitivity or value as a result of its Grade II listing. The Applicants have not argued that Hesketh Farmhouse has '<i>limited heritage significance</i>' as claimed by SRBC.</p> <p>The setting of the Grade II listed Hesketh Farmhouse is appraised in Table 1.2 of ES Volume 3, Annex 5.5: Settings assessment (APP-102). This describes the settings thus: '<i>Approximately 75 m to the east of the listed building is the current National Grid Penwortham Substation. The substation, and the pylons carrying cables from the substation, are very dominant in views of the listed building from the road. The setting of the listed building makes very little contribution to its heritage significance, most of which derives from the architecture of the structure. Key detractors comprise the electricity substation and pylons carrying overhead cables</i>'.</p> <p>The assessment of likely impacts and effects concludes that the construction of the 400 kV grid connection corridor would not affect the setting of the Grade II listed Hesketh Farmhouse, therefore there would be no effect. Consequently, there is no requirement to justify the harm to the heritage significance of this designated heritage asset as no harm would occur.</p>

Reference	Written Representation Comment	Applicants' response
		As set out in the response to 2027.14 in Procedural deadline A Submission - Annex 3.2.19 to Response to RR – South Ribble Borough Council (RR-2027) (PDA-026), the assessment presented in Volume 3, Annex 5.5: Settings assessment (APP-102) does not consider the likely impacts and effects in respect of the Grade II listed Hesketh Farmhouse arising from the change within its setting caused by the works to be undertaken by National Grid Electricity Transmission within the existing National Grid substation at Penwortham. The new electrical infrastructure, as described in Volume 1, Chapter 3: Project description (REP2-008) would occur within and immediately adjacent to an existing large substation, and therefore it is unlikely that they would result in any discernible harm to the heritage significance of the Grade II listed former farmhouse.
REP1-227 5.16	Additional information was received which confirmed the River Ribble Crossing has identified (see Figure 3.8 and Inset 4 – Figure 3.19, Volume 1: Figures) an approximately 150 m temporary working width, and 50 m permanent width. The proposals for installing a conventional underground cable tunnel trenchless installation technique, with tunnel headhouses, has been removed from proposals. The application now includes direct pipe, micro-tunnel trenchless installation techniques within the design envelope. The works are proposed to be bank to bank (i.e. no works will take place in the water) (CoT90 within the Commitments Register in Volume 1, Annex 5.3). As this information was received on the 14th of May 2025, limited time was available for the changes to be assessed by the Council's archaeologist however given the overlapping of temporary works required to the south of the River Ribble to accommodate this method including temporary access, working areas and construction compounds, the	<p>The Applicants refer SRBC to the response to 2027.15 in Procedural deadline A Submission - Annex 3.2.19 to Response to RR – South Ribble Borough Council (RR-2027) (PDA-026). The Applicants met with South Ribble Borough Council on 14 May 2025 and can confirm that at that meeting they directed SRBC to the Transmission Assets application documentation. It is noted that within section 3.7.2 of Volume 1, Chapter 3: Project description (REP2-008) that the temporary working widths for the River Ribble crossing are 150 m and these have not been updated. Further, within the same section it is noted that tunnel headhouses have been removed from the proposal leaving direct pipe and micro-tunnel techniques within the design envelope for the River Ribble crossing.</p> <p>Section 3.10 of Volume 1, Chapter 3: Project description (REP2-008) highlights that there are overlapping temporary works south of the River Ribble including temporary access, temporary working areas, and temporary construction compounds. These temporary works overlap to provide the necessary flexibility regarding connection to the National Grid substation which will be decided by National Grid.</p>

Reference	Written Representation Comment	Applicants' response
	proposal leads to uncertainties as to how this would affect the grounds surrounding and therefore additional information relating to archaeology and heritage are required. Given the change in transmission, the presented archaeological or heritage impact assessment is likely to be flawed, and the Council would require updated information on how conclusions relating to this area of the development have been arrived at.	With regard to the assessment of archaeological and heritage impacts, Table 5.10 of Volume 3, Chapter 5: Historic Environment (APP-096) identified the maximum design scenario for the River Ribble as direct pipe as this represents the greatest area of disturbance and, therefore, the greatest potential for impacts on buried archaeological remains and deposits of geoarchaeological interest. Further, section 5.11.2 presents the assessment of '2 Loss of, or harm to, buried archaeological remains and deposits of geoarchaeological and palaeoenvironmental interest' which includes the River Ribble crossing. This assessment concludes that there would be a moderate adverse impacts which is significant, however, uncertainty will be addressed through a programme of mitigation as set out in the Outline Onshore and Intertidal WSI (APP-214).
REP1-227 5.17	<ul style="list-style-type: none"> <li><i>Flood Risk</i></li> </ul> <p>The proposal includes the installation of a 400kv grid connection cable corridor beneath the River Ribble, undertaken by direct pipe or micro tunnel trenchless installation techniques. The information within the application is not considered sufficient to determine how the proposed development would intercept with the existing land during and after construction and its consequential impacts on properties, highways and farmland in terms of flood risk and areas affected by surface water flooding. The information provided relating to the two new substations, temporary construction compounds, temporary and permanent access, and onward connections to the existing National Grid substation at Penwortham are also considered to be limited. The council is therefore unable to fully consider and review the proposal in terms of flood risk and</p>	<p>The Applicants clarify that the maximum design scenarios identified in Table 2.20 of Volume 3, Chapter 2: Hydrology and flood risk (APP-070) have been selected as those having the potential to result in the greatest effect on properties, highways and farmland in terms of flood risk. Therefore, a robust assessment has been undertaken. As set out in Section 2.8 of APP-070, both 'embedded' and 'secondary' mitigation (commitments) have been taken into account in the assessment of effects.</p>



Reference	Written Representation Comment	Applicants' response
	additional information is required in order to ensure appropriate measures are agreed and put in place to prevent increased flood risk for the area.	
REP1-227 5.17	<ul style="list-style-type: none"> <li><i>Land use and Recreation</i></li> </ul> <p>The River Ribble Crossing has been identified (see Figure 3.8 and Inset 4 – Figure 3.19, Volume 1: Figures) to have a temporary working width of approx. 150m and 50m permanent width. APP-104 section 6.13 considers that the impact of development on agricultural holdings would be 'low' or negligible' with a 'minor adverse' cumulative effect, however given the updated width it is considered that this conclusion may not be accurate. The impact on the land use would be significantly higher during construction than that during its permanent use given the significance disparity in widths which should be reflected in an up-to-date assessment.</p>	<p>The assessment was based on sensitivity of the receptor, which ranged from low (for the onshore export cable corridor, 400 kV grid connection corridor and associated temporary infrastructure) to high (for several discrete agricultural holdings being affected by the onshore substation). It is noted that as set out in section 3.7.2 of Volume 1, Chapter 3: Project Description (REP2-008) here has been no update to the working width or permanent width of 150 m and 50 m respectively. Therefore, it is considered that the assessment included in section 6.11 of Volume 3, Chapter 6: Land use and recreation (APP-104) and the outcomes of this are proportionate and robust. Further, within Volume 3, Chapter 6: Land use and recreation (APP-104), the temporary width of 150 m has been used to assess the impact on soils and agricultural holdings with the only impacts of the River Ribble crossing being located at the entry and exit pits.</p> <p>As stated in paragraph 6.14.3.2 of Volume 3, Chapter 6: Land use and recreation (APP-104), the magnitude of cumulative impact has been assessed as negligible based on the location and extent of other proposed developments considered in the Cumulative Effects Assessment (CEA). Therefore, according to the criteria set out in Table 6.22 of Volume 3, Chapter 6: Land use and recreation (APP-104), the likely significance of the temporary effect on farm holdings was assessed as minor adverse, which is not significant in EIA terms. This assessment of cumulative effects reflects an up-to-date assessment.</p>
REP1-227 5.18	APP-104 section 6.16 states that there would be permanent major adverse effect arising from the loss of Best and Most Versatile agricultural land during construction. The applicant states that this has been	The Applicants refer SRBC to the response to 2027.19 in Procedural deadline A Submission - Annex 3.2.19 to Response to RR – South Ribble Borough Council (RR-2027) (PDA-026).

Reference	Written Representation Comment	Applicants' response
	concluded on an appropriate worst case construction scenario however as previously requested, the Council would seek to review the significance of the effect across different construction scenarios, including direct pipe or micro tunnel trenchless installation as proposed, cable and substation construction and during non-concurrent development.	
REP1-227 5.19	The Council acknowledge that the application is working on the basis of 'short term' impact as a period of months up to one year (Table 6.21 of Volume 3, Chapter 6: Land use and recreation (APP-104) with the applicant stating that no 'long term temporary impacts' are identified (Volume 3, Chapter 6: Land use and recreation (APP-104)). However, given the magnitude of the development and long-term impacts likely associated with the proposal in this location, the council does not consider that the proposal would fall within a 'short term' impact definition. The information presented at this stage is not considered to adequately justify the applicants conclusion.	<p>Table 6.18 of Volume 3, Chapter 6: Land Use and Recreation (APP-104) identifies the durations of the periods of temporary activities that have been assessed during the construction period. These are reproduced below:</p> <ul style="list-style-type: none"> <li>• Short term - Period of months, up to one year.</li> <li>• Medium term - Period of more than one year, up to five years.</li> <li>• Long term - Period of greater than five years.</li> </ul> <p>This includes the length of the sequential construction scenario that could extend for greater than 5 years (66 months) and therefore could lead to long term temporary effects.</p>
REP1-227 5.20	The nature of intervention through agricultural land is unknown and the information provided on the post development restoration of the corridor areas is limited. There has been no obvious consideration of how long the land will take to come back to its natural state, whether that state will be suitable for its original purpose or of lesser character, and how long land would effectively be sterilised for. Table 6.17 of Volume 3, Chapter 6: Land use and recreation (APP-104), details that the Applicants have made a commitment (CoT08 of Volume 1, Annex 5.3: Commitments Register of the ES (AS-030)) to reinstate land temporarily affected as soon	As described in Table 6.17 of Volume 3, Chapter 6: Land use and recreation (APP-104), the Applicants have made a commitment (CoT08 of Volume 1, Annex 5.3: Commitments Register of the ES (AS-030)) to reinstate land temporarily affected as soon as possible following construction of the Transmission Assets. For example, CoT08 commits to reinstate the working area to its pre-existing conditions as far as reasonably practicable in line with Construction Code of Practice for the Sustainable Use of Soils on Construction Sites (Defra, 2009), Good Practice Guide for Handling Soils in Mineral Workings (IQ, 2021) and Working with Soil Guidance Note on Benefitting from Soil Management in Development and Construction (BSSS, 2022). The handling, storage and reinstatement of soils temporarily affected during construction will be undertaken in

Reference	Written Representation Comment	Applicants' response
	as possible following construction of the Transmission Assets however this is not specific to the 400kv Grid Connection Cable Corridor beneath the River Ribble through direct pipe or micro tunnel trenchless installation and therefore the Council cannot conclude the proposed restoration works would be 'best practice' as referred to by the applicant.	accordance with the Outline Soil Management Plan (SMP) (APP-200) and subsequent detailed SMP(s), with oversight from the appointed Agricultural Liaison Officer (ALO). The commitment to prepare detailed SMP(s) is secured in Requirement 8 of Schedules 2A & 2B of the draft DCO (AS-004). Taking the above information into account, it is considered that sufficient measures would be in place to ensure the effective and timely reinstatement of land temporarily affected during construction of the Transmission Assets.
REP1-227 5.21	The Council is of the opinion that this analysis should consider all potential development scenarios, including non-concurrent development and notes that it may be the case that the impact should properly be categorised as greater than 'minor adverse' and that the proposals may therefore need to be amended accordingly. The Council also considers it appropriate that in its ongoing engagement with affected stakeholders, that the applicant properly quantifies the potential period of impact.	The Applicants refer SRBC to the response to 2027.21 in Procedural deadline A Submission - Annex 3.2.19 to Response to RR – South Ribble Borough Council (RR-2027) (PDA-026).
REP1-227 5.22	<ul style="list-style-type: none"> <li><i>Traffic and Transport</i></li> </ul> <p>The submitted information lacks sufficient evidence to support the suitability or feasibility of some of the routeing proposals for highways, including structures within the highway, for this project. This includes whether the routes can support the project's vehicles, abnormal loads, or the impact on other users. There is also a concern about necessary rectification works post-delivery of abnormal loads, post-development delivery, or further impacts on the highway network during any</p>	<p><b>Highway structures</b></p> <p>The Applicants' have commissioned Wynns (consulting engineers specialising in the movement of abnormal loads) to assess the potential for the movement of the abnormal loads for the Transmission Assets (the scope of which includes a review of highway structures and route geometry). These studies (S_D2_16 Abnormal Indivisible Load Study: Transformers - Rev F01 (REP2-049) and S_D2_17 Abnormal Indivisible Load Study: Cable drums - Rev F01 (REP2-051)) confirm that the highway structures can accommodate the proposed loads.</p> <p><b>Rectification works</b></p>

Reference	Written Representation Comment	Applicants' response
	<p>development decommissioning. The document states that an assessment has been undertaken on the effects on transport including impact on driver delay, non-motorised delay, fear and intimidation, severance (caused by construction works/traffic), road safety etc however this is not specified to day/times and therefore the Council query how the applicant has concluded on this impact.</p>	<p>The Applicants would direct the Council to the updated Outline Construction Traffic Management Plan (oCTMP) (REP2-016). Section 1.11.3 of the oCTMP outlines a comprehensive strategy for management of the highway asset to ensure that the potential for deterioration of the highway (as a consequence of the construction of the Transmission Assets) is managed. The requirement to produce detailed CTMP(s) in accordance with the oCTMP in consultation with, and for approval by, the relevant highway authority, is secured by Schedules 2A and 2B of Requirement 9 of the draft DCO (REP2-004).</p> <p><b>Assessment Periods</b></p> <p>Volume 3: Chapter 7: Traffic and Transport (APP-108) contains an assessment of the potential impacts from the Transmission Assets of increased construction traffic movements. The assessment has considered the potential impacts of the Project in relation to driver delay, severance, non-motorised user delay, fear and intimidation (which encompasses amenity), road safety and abnormal loads. The assessment has been undertaken in accordance with the relevant guidance published for the Environmental Assessment of Traffic and Movement (published by the Institute of Environmental Management and Assessment (IEMA), 2023). The IEMA guidelines note that determining factors that need to be taken into account when assessing the impact of traffic will vary for each type of impact. Accordingly, the assessment delimits the extent of the assessment using daily traffic flows to identify highway links (and associated sensitive receptors) that have the potential to be exposed to significant effects). Thereafter the magnitude of impact is determined using the discrete factors relevant to the impact under consideration (e.g. driver delay considers peak hour traffic) to assess the significance of effect for the highway link and receptor group under consideration.</p>

Reference	Written Representation Comment	Applicants' response
REP1-227 5.23	<p>The applicant clarifies that core working hours for Transmission Assets are 07:00 to 19:00 (Monday to Saturday) which the Council considered to be excessive; particularly as traffic to and from the South Ribble developable area is down a very quiet, semi-rural road where residents should expect a level of residential amenity which this would not provide for. Regardless of the caveat restricting noisy activities, commercial and heavy vehicles passing residential property in this very quiet locality, and at such close proximity for 12hrs over a six-day period is inappropriate. The Council asks that these timescales are urgently addressed. Having regard to these hours of proposed construction, the Council is also concerned that pedestrian safety would be compromised. Howick Cross Lane is a narrow lane with few pavements, where heavy vehicles would not be expected during early and later hours of the day.</p>	<p>The Applicants would clarify that the proposed working hours for the Transmission Assets are 07:00 to 19:00 (Monday to Saturday) and this commitment is secured by Requirement 14 of Schedules 2A and 2B the draft DCO (REP2-004). The outline Code of Construction Practice (APP-193) clarifies that the mobilisation period (up to one hour before and after core working hours for mobilisation i.e. 06:00-07:00 to 19:00-20:00) will include:</p> <ul style="list-style-type: none"> <li>• arrival and departure of the workforce at the site and movement around the Transmission Assets that does not require the use of plant;</li> <li>• site inspections and safety checks; and</li> <li>• site housekeeping that does not generate significant noise or lighting levels.</li> </ul> <p>Therefore, the arrival and departure of HGVs are not permitted within the mobilisation period and this commitment is captured within section 1.3.3 of the (oCTMP) (REP2-016). The requirement to produce detailed CTMP(s) in accordance with the OCTMP in consultation with, and for approval by, the relevant highway authority, is secured by Schedules 2A and 2B of Requirement 9 of the draft DCO (REP2-004).</p> <p>The approach to working times has the benefit of ensuring that workers would travel outside of the network peak hours, thereby reducing the effects upon driver delay (capacity) and also avoiding significant employee traffic movements during the more sensitive periods for the effects of severance and amenity, e.g. during morning and evening network peak hours and school start and finish times (where non-motorised user movements would be higher).</p> <p>With specific regard to pedestrian safety along Howick Cross Lane, the Applicants initially note that Table 7.22 of Volume 3: Traffic and Transport (APP-108) identifies that there is a baseline of 1,034 vehicles per day (of which 13 are HGVs). It is therefore likely that existing non-motorised users would expect to encounter other vehicles (including HGVs) along this link.</p>

Reference	Written Representation Comment	Applicants' response
		Notwithstanding, the Applicants acknowledge that this link is currently of constrained width and have proposed measures within section 1.9 the oCTMP (REP2-016) to manage the safe movement of vehicles along this link. The requirement to produce detailed CTMP(s) in accordance with the OCTMP in consultation with, and for approval by, the relevant highway authority, is secured by Schedules 2A and 2B of Requirement 9 of the draft DCO (REP2-004).
REP1-227 5.24	The information presented is not considered to adequately address routing and no engagement has been made with South Ribble Borough Council's Local Highway Authority and therefore the impact is inconclusive at this stage. Without said information, the council is unable to understand the likely significant damage to the highway (including structures) and as a consequence, the risk of road closures. In addition, the applicant also remains unclear how the development related damage to the highway will be overcome. Details of routing and associated impacts details above would be required in order for the Council to conclude and agree appropriate mitigation measures.	<p>The Applicant's assessment has been informed by the Planning Inspectorate's Scoping Opinion (APP-230) and consultation with statutory stakeholders via the evidence plan process (EPP) and statutory consultation on the Preliminary Environmental Information Report (PEIR). The EPP established a traffic and transport expert working group (EWG), which included South Ribble Borough Council on the invitee list. As confirmed in ES Volume 3, Chapter 7: Traffic and Transport, Table 7.4 (APP-108) the T&amp;T EWG met three times to inform the DCO submission. Following the submission of the DCO application, the Applicants have also met with South Ribble Borough Council's local highway authority (Lancashire County Council) on four separate occasions following the submission of the DCO application to discuss traffic matters. The Applicants will continue to engage with all relevant highway stakeholders throughout the examination process to address any residual concerns.</p> <p>The Applicants refer the Council to its response to REP1-227 5.22 above which includes a response in regard to how the potential for damage to the highway would be managed and suitability of highway structures.</p> <p>Detail of vehicle routing and how this will be managed, monitored and controlled is contained within the Outline Construction Traffic Management Plan (oCTMP) (REP2-016). The requirement to produce detailed CTMP(s) in accordance with the OCTMP in consultation with, and for approval by, the relevant highway authority, is secured by Schedules 2A and 2B of Requirement 9 of the draft DCO (REP2-004).</p>



Reference	Written Representation Comment	Applicants' response
REP1-227 5.25	The application highlights the need to clear vegetation and other obstacles to facilitate access, which could lead to damage, compaction, reduced effectiveness of verges as drains, edge of carriageway deterioration, and safety issues for pedestrians. However, there is no commitment proposed to mitigate or fund damage to the public highway caused by the project. Where loss of trees, hedgerow or ecological habitat to provide for suitable, safe sightlines or other unexpected highway works are proposed, the Council requests that associated ecology and tree surveys are revisited.	<p>The Applicants have prepared outline designs for all accesses and crossings. These plans are provided in the Outline Highway Access Management Plan (oHAMP) (AS-052) and include detail of:</p> <ul style="list-style-type: none"> <li>the junction geometry (informed by vehicle swept path analysis),</li> <li>visibility splays to ensure that drivers departing from accesses and crossings can safely observe traffic on the main road; and</li> <li>provision to ensure that non-motorised users can be safely accommodated.</li> </ul> <p>The requirement to develop detailed access designs (which would include detail such as drainage and signing) as part of preparing detailed HAMPs is captured within section 1.3 of the oHAMP (AS-052) and secured by Schedules 2A and 2B of Requirement 10 of the draft DCO (REP2-004).</p> <p>Where the provision of the access, crossing or visibility splay could result in the requirement for the removal of trees or hedges these have been included within the Order Limits and the powers to remove the hedges (as a worst case) are provided within the draft DCO (REP2-004) and are shown in B18 Tree Preservation Order and Hedgerow Plan (APP-165 – APP-167).</p> <p>Any un-surveyed trees or hedgerows located within the Onshore Order Limits which are to be lost to provide safe sight lines or other unexpected highway works, will be subject to further surveys prior to the commencement of construction.</p>
REP1-227 5.26	The Council raises concerns of inconsistencies within the Outline Highway Access Management Plan. Some routes are too narrow for two HGVs to pass particularly within this remote location. The documentation assumes that two HGVs can pass within a 5.5m highway. This is flawed as it does not account for the width of HGVs with wing mirrors and the necessary gap between moving vehicles. There are additional requirements for the swept path of an HGV on non-straight carriageways. Some	<p>The Applicants have provided clarification of measures within the updated oCTMP (REP2-016) (submitted at Deadline 2) in regard to highway geometry and how this is managed. This updated oCTMP was shared with LCC for comment ahead of Deadline 2 and a technical workshop is scheduled with LCC for 19 June to address any residual matters.</p> <p>The Applicants would note that there are no proposals to remove footways.</p>

Reference	Written Representation Comment	Applicants' response
	proposed highways are below 5.5m in width, presenting a safety issue. The council request clarity on the suggested road dimensions in order to avoid safety issues when the routes are used. Due to the remote and limited access within this area of South Ribble, the removal or temporary removal of footways would not be supported.	
REP1-227 5.27	The submitted documentation has not considered the impacts on other developments that are currently being built, committed, or are the subject of planning applications. Additionally, it has not accounted for works required by utility companies that legally operate within the highway. The assertion that existing HGV Traffic Regulation Orders (TROs) determine the suitability of a route for HGVs is incorrect. HGV TROs are typically used in locations where minor roads have historically been part of a longer route, not necessarily aligned with the highway hierarchy. As such, it is concluded that there remains significant outstanding issues in relation to traffic, transport and highway safety which need to be addressed to ensure the safety and feasibility of the proposed routes.	<p><b>Cumulative Effects and Utilities</b></p> <p>The Applicants would direct the Council to Section 7.13 of Volume 3, Chapter 7: Traffic and Transport of the Environmental Statement (APP-108) which contains an assessment of the potential for cumulative are addressed by the requirement for all highway works for the Transmission Assets and for other projects to be booked through Street Manager. The booking of any works through Street Manager (as mandated, and adopted by Lancashire County Council as the relevant local highway authority) will ensure that all highway works are progressed in accordance with the relevant highway authorities' requirements and restrictions (e.g. ensuring road works are scheduled outside of defined traffic sensitive periods and co-ordinated with other utility companies) and that the relevant highway authorities can continue to exercise their duties to ensure the safe and efficient movement of traffic.</p> <p><b>TROs</b></p> <p>A HGV restriction is a 'first pass' at determining if a route is suitable however, as the Council infer there are a number of factors that need to be considered and these are set out in detail in the Applicants' Response to Lancashire County Councils Local Impact Report (REP1-085 8.60 and 8.61) (REP2-039).</p>

Reference	Written Representation Comment	Applicants' response
REP1-227 5.28	<ul style="list-style-type: none"> <li><b>Noise and Vibration</b></li> </ul> <p>With regards to potential impacts arising from noise and vibration, the Council notes that in APP-117 the applicant responds to a PINS query relating to the degree to which construction activities will occur concurrently. The applicant asserts that maximum impact will arise from concurrent development and that the assessment is therefore presented on this basis. However, duration of impact is fundamental to understanding the nature of noise and vibration impacts. Indeed, APP-035 section 1.12.8 acknowledges that some night-time working will be required, and it seems self-evident that a longer period of development would give rise to greater impacts in this regard. Therefore, the Council considers that other development scenarios should be considered, including those where development is not concurrent. It is also considered appropriate that noise is considered against revised construction hours as requested above.</p>	<p>The Applicants confirm that the approach to determining the Maximum Design Scenario incorporates consideration of both the magnitude of the impact and the following durations as described in Paragraph 8.10.3.3 of Volume 3, Chapter 8: Noise and vibration (APP-117): <i>'10 or more days of working in any 15 consecutive days or a total number of days exceeding 40 in any 6 consecutive months'</i>.</p> <p>Irrespective of the magnitude impact generated, both the sequential and concurrent scenarios will exceed these durations and may therefore lead to significant adverse effects for which mitigation is secured through the outline Noise and Vibration Management Plan [APP-196] By specifying the MDS as concurrent construction, the highest magnitude of impacts is captured, the worst possible likely significant adverse effects identified., and appropriate mitigation is provided.</p>
REP1-227 5.29	<p>APP-117 Table 8.3 states that 'The core working hours for the construction of the landfall and onshore elements will be: • Monday to Saturday: 07:00 - 19:00 hours; • up to one hour before and after core working hours for mobilisation ("mobilisation period") i.e. 06:00 to 20:00. Activities carried out during the mobilisation period will not generate significant noise levels (such as piling, or other such noisy activities)'. App-117 section 1.12.8 however acknowledges that 'some specific activities such as trenchless techniques and cable pull require periods of night-time working; however, the majority of works would occur during normal daytime construction</p>	<p>As defined within the Outline Code of Construction Practice (APP-193) specific activities may require continuous working hours (24 hour operations). This is typically associated with technically complex works or safety critical operations and are listed out in section 1.6.2.7. The frequency and duration of these continuous activities will vary by location and be limited in nature. In most cases, such continuous operation will be isolated events rather than ongoing occurrences at any single location.</p> <p>Volume 3, Chapter 8: Noise and vibration of the Environmental Statement (APP-117) assesses 24 hour working where applicable. The continuous 24-hour working is related to complex trenchless technique installations which can be identified as "Major" under the Trenchless Technique Category in the Onshore Crossing Register (REP1-016).</p>

Reference	Written Representation Comment	Applicants' response
	working hours. The applicant confirmed that prior agreement will be sought for undertaking activities outside of these core hours from the relevant planning authority (save for emergency works or trenchless installation where continuous 24hour working is required) as per Requirement 14(3) of Schedule 2A and Schedule 2B of the draft DCO (AS-004). Notwithstanding this, the Council would seek this information to be presented at examination stage to allow understanding of the likely timeframes of this type of work required which will contribute to the overall planning balance.	
REP1-227 5.30	Of the eight indicators relied upon in the assessment of human health impacts arising from noise exposure at ward level, set out in APP-035 section 1.7.6, only one has data available. The Council considers that for development with the potential for such significant impact, that either data should be found, or another methodology should be used.	The Applicants refer South Ribble Borough Council to RR-705.8 in Procedural deadline A Submission - Annex 3.2.23 to Response to RR - Fylde Borough Council (PDA-030).
REP1-227 5.31	In conclusion, it is not apparent that noise and vibration has been suitably considered, with full regard to increases as a consequence of construction and traffic movement, with suitable mitigation being provided to ensure that noise and vibration levels do not cause a concern to those impacted. A Requirement is recommended to continuously review noise and vibration levels and proactively manage construction traffic and construction to minimise impacts. This also includes the nighttime works required for cable pulling.	Potential impacts related to construction noise and vibration, and construction traffic have been fully assessed within Volume 3, Chapter 8: Noise and vibration (APP-117). Any potential impacts would be managed and mitigated in line with the Construction Noise and Vibration Management Plan(s), which will be developed from the Outline Construction Noise and Vibration Management Plan (APP-196) and which forms part of the Outline Code of Construction Practice (OCoCP). The detailed CoCP(s) are secured by Requirement 8 of Schedules 2A and 2B of the draft DCO (AS-004). Detailed Construction Noise and Vibration Management Plan(s) will be implemented by the Applicants as approved by the relevant local planning authorities in consultation with the relevant statutory stakeholders, as appropriate.

Reference	Written Representation Comment	Applicants' response
REP1-227 5.32	<ul style="list-style-type: none"> <li><i>Air Quality</i></li> </ul> <p>The Council notes that the applicant sets out that the onshore infrastructure, once operational, will give rise to no direct emissions. This includes the substations, which it states in APP-121 table 9.5 "Once operational, the substations will not have any emissions to air (such plant/stack emissions). Impacts arising from emissions from plant and stacks have been scoped out of the air quality assessment as agreed with the Planning Inspectorate." The Council questions how claims such as this can be made when on shore assets proposed for Penwortham have not been confirmed, assessed or granted permission.</p>	The Applicants refer SRBC to the response to 2027.32 in Procedural deadline A Submission - Annex 3.2.19 to Response to RR – South Ribble Borough Council (RR-2027) (PDA-026).
REP1-227 5.33	<p>The same assessment notes that the greatest potential for impact on air quality will arise during construction, by way of dust, with table 9.16 assessing the area and volume of that impact. However, the Council is concerned that the possibility of multiple repeat construction phases has not been properly considered. The assessment should consider the impacts arising from the different likely development scenarios, which could include the development effectively being carried out three times, at least in part. Section 9.13.2.1 contradicts the assertion however by stating that 'cumulative effects arising during construction for transmission assets would be not significant.'</p>	The Applicants refer SRBC to the response to 2027.33 in Procedural deadline A Submission - Annex 3.2.19 to Response to RR – South Ribble Borough Council (RR-2027) (PDA-026).

Reference	Written Representation Comment	Applicants' response
REP1-227 5.34	Therefore, it is concluded that air quality has not been adequately addressed, particularly concerning the increases due to construction and traffic movements. Suitable mitigation measures have not been proposed to ensure that air quality remains unaffected. It is recommended to implement a requirement for continuous review of air quality monitoring data and proactive management of construction traffic to minimise the risk of exceedances.	The Applicants' position is that the assessment within the ES robust and all potential impacts related to air quality have been fully assessed within Volume 3, Chapter 9: Air quality (APP-121). Any potential impacts would be managed and mitigated in line with the detailed dust management plan(s), which will be developed from the outline dust Management plan (APP-195) and which forms part of the Outline Code of Construction Practice (oCoCP). The detailed CoCP(s) are secured by Requirement 8 of Schedules 2A and 2B of the draft DCO (AS-004). Detailed dust management plan(s) will be implemented by the Applicants as approved by the relevant local planning authorities in consultation with the relevant statutory stakeholders, as appropriate.
REP1-227 5.35	<ul style="list-style-type: none"> <li><i>Public Rights of Way (PROW)</i></li> </ul> <p>The application has not adequately addressed the impact of the developments on the amenity and quality of the user experience of the Public Rights of Way (PROW) network. This aspect needs to consider the effects on both the tourism industry and local communities. As it stands, the documentation makes no commitments and does not consider the needs of the community, focusing only on the process regarding changes and closures.</p>	<p>The Applicants note that the visual impacts of PROW users are assessed in Volume 3, Chapter 10 Landscape and visual effects (APP-123). The impacts on visual amenity would apply to the local community and visitors to the area. Indirect impacts of visual amenity on the tourism industry is considered in section 2.12.6 of Volume 4, Chapter 2: Socio-economics (APP-141). It was concluded that these indirect impacts would not be significant.</p> <p>To manage the potential impacts of construction, the Applicants will apply the measures described in the Outline PROW Plan (AS-048). For the majority of the PROW intersected by the Onshore Order Limits, it is proposed that these will remain open with appropriate signage (i.e. managed crossings) to warn of the presence of construction vehicles, and to warn of the presence of walkers, cyclists and horse riders. These managed crossings of PROW will be fenced off with gated crossing points and temporary site fencing to prevent the public from accessing the PROW, when access would need to be managed. Where there is a specific requirement to maintain the access, a suitable route will be clearly marked out to aid safe passage. Where such crossings are installed, a gap will be</p>



Reference	Written Representation Comment	Applicants' response
		<p>left in the topsoil bunds after the topsoil has been stripped within the onshore export cable corridors.</p> <p>The measures to be implemented as part of the PRoW Management Strategy seek to minimise impacts on public footpaths, bridleways and other promoted routes (e.g. National Cycle Routes (NCRs), Long Distance Footpaths) during construction of the Transmission Assets. The detailed Public Right of Way Management Plan(s), which will be developed in accordance with the outline Public Rights of Way Management Plan (AS-048), and which forms part of the detailed Code of Construction Practice(s). The detailed CoCP(s) are secured by Requirement 8 of Schedules 2A and 2B of the draft DCO (REP2-004). Detailed Public Right of Way Plan(s) will be implemented as approved by the relevant local planning authority</p>
REP1-227 5.36	<p>It is noted on plan BP-GBR-MORG-REG-0180: sheet 17 that the Ribble way (MC13B) and public right of way (MG13/A), and on sheet 18 that public rights of way MCMC11A/B and 14A/B would be temporarily restricted or closed. A more detailed idea of what 'temporary' in this case would be welcomed, so as to enable the Council to manage resident expectations. There is a lack of clarity regarding which rights of way will be open, diverted, or closed, and whether continuous alternative routes will be available. The strategy for situations where a PROW crosses a haul road, for example, is unclear. It is essential to agree on the principles at this stage to provide certainty to users. This process should follow legal requirements, with the developer providing mitigation measures to ensure safety is not compromised and the maximum potential usage of PROW is maintained.</p>	<p>The Outline Public Rights of Way Management Plan (AS-048) includes Table 1.2 that identify the indicative proposed management measures to be adopted where PRoW are located within the Transmission Assets area. This is accompanied by Figures 1.1 – 1.10 in the Outline Public Rights of Way Management Plan (AS-048) which shows the location of the PRoW and where management measures are proposed. Prior to the commencement of a relevant stage of works detailed PRoW Management Plans will be prepared as part of the detailed Code of Construction Practice following the principles laid out in the Outline Plan. The Applicants have made a commitment (CoT32 of Volume 1, Annex 5.3: Commitments Register of the ES (REP2-010)) to implement detailed PRoW management plan(s) in line with the Outline PRoW management plan (AS-048). This would include measures to minimise the disturbance to PRoWs, where practicable. Where practically possible the impact will be temporary and PRoWs will be reinstated as soon as reasonably practicable. This is secured by Requirement 8 within Schedules 2A &amp; 2B of the draft Development Consent Order (REP2-004). Detailed CoCP(s) will be</p>



Reference	Written Representation Comment	Applicants' response
		<p>implemented by the Applicants as approved by relevant local authorities in consultation with stakeholders, as appropriate.</p> <p>The Applicants will pro-actively engage with South Ribble in regards to this matter.</p>
REP1-227 5.37	<p><u>Potential Offshore and Onshore environmental effects</u></p> <ul style="list-style-type: none"> <li><i>Seascape, landscape and visual resources</i></li> </ul> <p>The applicant has confirmed that the four elements referred to in the submitted Landscape and Visual Resources' assessment (APP-123 – APP127 are landfall, 400 kV grid connection cables, 400 kV grid connection cable corridor and onshore substations. The four elements are limited to onshore elements of the generation development. The Council considers that the incombination effects of both the generation and transmission infrastructure must be considered to properly assess the impact on seascape, landscape and visual resources.</p>	<p>The Applicants refer to Section 10.13, Cumulative Effect Assessment Methodology of Volume 3, Chapter 10: Landscape and Visual Resources (APP-123). Paragraph 10.13.1 of this chapter confirms that one of the four scenarios considered as part of the cumulative landscape and visual assessment - prepared in accordance with the methodology set out in Volume 1, Chapter 5: Environmental Assessment Methodology - was the "<i>Transmission Assets together with Morgan Offshore Wind Project: Generation Assets and Morecambe Offshore Windfarm: Generation Assets</i>" (referred to as Scenario 3). The assessment of cumulative effects, as reported at paragraph 10.14.1.3, concluded that:</p> <p><i>"At 50 km from the Transmission Assets, there is no potential for cumulative effects to occur with the Morgan Offshore Wind Project: Generation Assets and thus Scenario 2 [comprising the Transmission Assets together with Morgan Offshore Wind Project: Generation Assets], and by extension Scenario 3, are not considered further."</i> Morecambe Generation Assets was therefore only cumulatively assessed with Tier 1 projects (see section 10.14.2 and 10.14.3 of APP-123).</p> <p>On this basis, the Applicants stand by the assessment within the Environmental Statement and its conclusions. The assessment has been undertaken in accordance with established best practice guidance for Environmental Impact Assessment, and the Applicants consider that no details are absent or insufficient to adequately inform a proportionate and comprehensive assessment.</p>

Reference	Written Representation Comment	Applicants' response
REP1-227 5.38	<p>Whilst seascape assessment would impact primarily on Fylde Borough Councils area, landscape visual impact to and from South Ribble, and across the River Ribble is relevant and must be considered in the planning balance. Policy 28 of the Central Lancashire Adopted Core Strategy relates to renewable and low carbon energy generation and require cumulative and cross-boundary impacts be considered. The loss of established parts of the natural environment must also be taken into account, and surveys adjusted where relevant. Howick and Priory ward has only 12.3% tree canopy cover – relatively low when compared to other wards in the area, and unnecessary loss of trees cannot be supported.</p>	<p>The Applicants confirm that Volume 3, Chapter 10: Landscape and Visual Resources (APP-123) assesses the potential impacts arising from all components of the Transmission Assets. For the South Ribble Borough, this includes the 400 kV export cable which traverses the north-western part of the Borough before connecting to the existing Penwortham substation.</p> <p>The Applicants confirm that any potential “cross-boundary impacts” - interpreted to mean impacts arising from components of the Transmission Assets located within a neighbouring authority - have been duly considered and reported within the Environmental Statement. For South Ribble Borough, the assessment concluded that potential impacts would arise solely from the construction of the 400 kV export cable and its connection to the Penwortham substation. Given the buried nature of this infrastructure during operation, with only inspection covers associated with underground link boxes remaining visible, operational impacts on landscape and visual resources were assessed to be negligible.</p> <p>Regarding cumulative effects, the Applicants refer to Section 10.14 Cumulative Effects Assessment of Volume 3, Chapter 10: Landscape and Visual Resources (APP-123), which sets out the four cumulative scenarios considered, noting specifically to South Ribble Borough Council “Scenario 4a to 4c considered Transmission Assets together with Morgan Offshore Wind Project: Generation Assets and Morecambe Offshore Windfarm: Generation Assets and other relevant projects and plans”.</p> <p>Further detail is provided in Table 10.28 of Section 10.14.6 Onshore Cumulative Visual Impact Assessment: Onshore 400 kV Grid Connection Cable Corridor (APP-123), which presents the cumulative visual impact assessment for the 15 km 400 kv cable corridor that extends south-east from the onshore substation sites to the Penwortham substation. The study area for this assessment comprises a 1 km buffer either side of the 400 kV grid connection cable corridor.</p>

Reference	Written Representation Comment	Applicants' response
		<p>Tree survey information and an assessment of the potential impacts of the Transmission Assets on trees are provided in Volume 3, Annex 10.5: Tree Survey and Arboricultural Impact Assessment (Part 1: APP-128; Part 2: APP-129) of the Environmental Statement. This assessment includes consideration of Tree Preservation Orders, Ancient Woodland, and the Lytham St Annes Dunes SSSI and LNR.</p> <p>In accordance with Commitment CoT13 set out in Volume 1, Annex 5.3: Commitments Register of the Environmental Statement (AS-030), any sections of hedgerows and trees that are removed will be replaced with species of equivalent type. This commitment is secured through Requirement 8 (Code of Construction Practice) and Requirement 12 (Ecological Management Plan) of Schedules 2A and 2B of the draft Development Consent Order (DCO) (REP1-008), with implementation subject to approval by the relevant planning authorities in consultation with statutory stakeholders, as appropriate.</p> <p>While final planting mixes will be confirmed at the detailed design stage, indicative species mixes are provided in Appendix B of the Outline Landscape Management Plan (AS-050). The preparation and implementation of detailed Landscape Management Plan(s) are secured under Requirement 6 (Provision of Landscaping) of the draft DCO (Schedules 2A and 2B of REP1-008).</p>
REP1-227 5.39	<ul style="list-style-type: none"> <li><i>Green Belt development</i></li> </ul> <p>The assessment of overall climate impacts considers the cumulative impact of both transmission and generation assets, as summarised in APP-138 section 1.16. Most other parts of the application exclude consideration of incombination effects of both generation and transmission assets. However, the Council supports the approach of properly considering the cumulative</p>	<p>The Applicants refer SRBC to the response to 2027.39 in Procedural deadline A Submission - Annex 3.2.19 to Response to RR – South Ribble Borough Council (RR-2027) (PDA-026).</p>

Reference	Written Representation Comment	Applicants' response
	incombination effects of both generation and transmission.	
REP1-227 5.40	With regards to the proposed generation assets at Penwortham, it must be noted that this site is within land allocated as Green Belt. The National Planning Policy Framework 2024 at Para 160 and National Policy Statements EN-1 and EN-3 are clear that when located in the Green Belt, elements of many renewable energy projects will comprise inappropriate development, and approval would be dependent on demonstration of very special circumstances.	The Applicants refer SRBC to the response to 2027.40 in Procedural deadline A Submission - Annex 3.2.19 to Response to RR – South Ribble Borough Council (RR-2027) (PDA-026).
REP1-227 5.41	It is felt that the submission hereby considered is based on an assumption that permission for proposed onshore assets would automatically be approved through the planning process. The risk that this may not be the case does not appear to have been given sufficient weight in deliberations. Separately, the alternatives to the proposed connection site do not appear to have been fully provided. The Council would therefore expect to see evidence of a sequential test for land which is not Greenbelt, or a reduction in use of land which is Green Belt or otherwise protected such as for Areas of Separation.	The Applicants refer SRBC to the response to 2027.41 in Procedural deadline A Submission - Annex 3.2.19 to Response to RR – South Ribble Borough Council (RR-2027) (PDA-026).
REP1-227 5.42	It is noted that alternative locations for some infrastructure and routing have been considered but these are limited to the Formby and Blackpool areas, and have regard primarily to environmental protection, when other areas of impact are also possible (residential amenity, loss of Green Belt land, economic disadvantage etc). It is noted that the only requirement from the	The Applicants refer SRBC to the response to 2027.42 in Procedural deadline A Submission - Annex 3.2.19 to Response to RR – South Ribble Borough Council (RR-2027) (PDA-026).

Reference	Written Representation Comment	Applicants' response
	National Energy System Operator was to connect to the national grid transmission network at Penwortham, yet this does not preclude a wider search to ensure that the agreed solution is the most appropriate having regard to impacts on communities, business, tourism and farmland, and damage to ecology/landscape/archaeology as well as cost. As detailed in paragraphs 5.2-5.5 above, it is considered that the information presented has not fully demonstrated the possibility of an alternative site than this sensitive location.	
REP1-227 5.43	<p><u>Socioeconomics</u></p> <p>The Council acknowledges that there would be some limited economic impact in South Ribble during construction as farmland is sterilised, and out of action, although this is likely to be limited. Loss of residential amenity to those residents who currently work from home is likely to be more intense as traffic, noise, dust and general disruption occur. Clarity is required as to the impacts upon local residents, and the implications during periods when services and local infrastructure are unavailable for use during construction. Furthermore, limited information has been provided in terms of the benefits of the proposal for local residents. This could include for example, reduced energy costs for those in the immediate area or incentives to the residents who would be most affected by the development.</p>	<p>The Applicants refer SRBC to the response to 2027.44 and 2027.45 in Procedural deadline A Submission - Annex 3.2.19 to Response to RR – South Ribble Borough Council (RR-2027) (PDA-026).</p> <p>An Outline Employment and Skills Plan (APP-239) is included in the DCO application. The Applicants have made a comment (CoT57 of Volume 1, Annex 5.3: Commitments Register of the ES (REP2-010)) to develop detailed Employment and Skills Plan(s) in line with the Outline Employment and Skills Plan. The plan(s) will be prepared by the Applicants to help develop and support the economic benefits associated with the Transmission Assets in relation to employment and skills within the offshore wind sector. The detailed employment and skills plan(s) are secured by Requirement 19 of Schedules 2A and 2B of the draft DCO (AS-004). Detailed Employment and Skills Plan(s) will be implemented by the Applicants and approved by Lancashire County Council in consultation with each relevant local planning authority, including SRBC. This ensures that each relevant local planning authority will have an opportunity to provide comments or suggestions in advance of the detailed Employment and Skills Plan being approved pursuant to Requirement 19(b). The approach of having a single higher tier/regional Council as approving body of the</p>

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		<p>detailed Employment and Skills Plan aligns with all recent offshore wind DCOs.</p> <p>The key benefits of the Transmission Assets are contained in Section 1.5 of the Statement of Reasons (REP1-012). The Applicants highlight the updates made at Deadline 1 to the Statement of Reasons (tracked) (REP1-013). This includes those benefits that would be experienced at the local level. The Applicants have also explained how they will engage on a community benefit fund that, in accordance with Government guidance, sits outside of the planning process and in line with this guidance, should not be a material consideration in that regard, in the response to Hearing Action Point ISH1_31 (REP1-037).</p>
REP1-227 6.1	<p><i>The Councils Summary Position</i></p> <p>The Council welcomes the principle of the proposed development, recognising its potential to deliver national benefits through the reduction of carbon emissions from energy generation. This aligns with the Government's Clean Power Mission and broader policy objectives to double onshore wind capacity and meet clean energy targets in response to the climate crisis. The Council also acknowledges the likely creation of employment opportunities associated with the proposal, which, albeit temporary, would provide a degree of support to the local economy.</p>	<p>The Applicants welcome SRBC's summary position relating to the overarching principle of the Transmission Assets.</p>
REP1-227 6.2	<p>However, the Council notes that the National Planning Policy Guidance for Nationally Significant Infrastructure Projects advocates a front-loaded approach, whereby developers are expected to undertake meaningful consultation prior to submitting an application to the</p>	<p>The Applicants refer SRBC to the response to 2027.51 in Procedural deadline A Submission - Annex 3.2.19 to Response to RR – South Ribble Borough Council (RR-2027) (PDA-026).</p>

Reference	Written Representation Comment	Applicants' response
	Planning Inspectorate. In this case, the Council considers that there are areas where this process has not been fully adhered to. Several assumptions appear to have been made based on incomplete or insufficiently justified documentation, and there remains a lack of clarity and certainty regarding the proposed mitigation measures.	
REP1-227 6.3	The Council maintains that the information submitted to date does not adequately address all relevant matters, and as such, it is not in a position to reach a definitive conclusion on the issues outlined above. The Council has significant concerns regarding the proposed development of both the generation and transmission assets. It is the Council's view that the in-combination effects of these components must be assessed comprehensively across all relevant impact areas.	The Applicants refer SRBC to the response to 2027.47 and 2027.48 in Procedural deadline A Submission - Annex 3.2.19 to Response to RR – South Ribble Borough Council (RR-2027) (PDA-026). The Applicants will continue proactively engage with SRBC regarding the concerns raised.
REP1-227 6.4	The Council is particularly concerned that the separation of the generation and transmission elements—alongside the assumption of a single phase of concurrent development for the transmission infrastructure—risks undermining a full and proper understanding of the project's cumulative impacts. While the applicant has referenced in-combination effects in the context of climate change assessments, the Council considers it inappropriate to apply this selectively. Should the generation and transmission elements continue to be assessed independently, the Council asserts that the principle of development for the transmission infrastructure cannot be predicated on the existence of a generation application that has not yet been approved.	<p>The Applicants refer SRBC to the response to 2027.50 in Procedural deadline A Submission - Annex 3.2.19 to Response to RR – South Ribble Borough Council (RR-2027) (PDA-026).</p> <p>In summary, the Applicants have undertaken a full cumulative assessment as set out within Volume 1, Chapter 5: Environmental assessment methodology (APP-034). Section 5.4.9 sets out how the Transmission Assets have been assessed with the respective Generation Assets. This methodology was subsequently applied to the relevant chapters within the Environmental Statement.</p>



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REP1-227 6.5	<p>Furthermore, the Council is concerned about the potential for multiple, repeat phases of construction and the associated implications for noise and vibration, air quality, ecology, traffic and transport, agricultural land, and human health. The current assessment appears to rely solely on maximum impact scenarios, which may overlook specific risks arising from alternative or prolonged construction scenarios—such as extended night-time works—that could result in significantly greater harm, particularly to human health and ecological receptors. In the context of an agricultural setting, the Council considers that non-concurrent development could exacerbate these impacts. No clear short-, medium-, or long-term strategy has been presented to manage or mitigate these risks effectively.</p>	<p>The Applicants refer SRBC to the response to 2027.49 in Procedural deadline A Submission - Annex 3.2.19 to Response to RR – South Ribble Borough Council (RR-2027) (PDA-026).</p> <p>In addition, a 'Clarification Note: Construction Scenarios' (REP1-060) was submitted at Deadline 1 which provided further clarifications on the construction scenarios assessed for hydrology and flood risk and noise and vibration. Section 1.3 of REP1-060 notes that for hydrology and flood risk, the maximum design scenario is considered to be the sequential scenario due to the longer period of time which watercourses and the local surface water drainage system would be exposed to additional surface water runoff as a result of construction of the Transmission Assets. Section 1.4 of REP1-060 notes that for noise, the maximum design scenario is concurrent construction due to increased quantity of plant in use (i.e., an increased quantity of construction plant in use which would increase the construction noise level). For vibration, a concurrent construction scenario is considered to represent the maximum design scenario due to plant operating at the same time.</p> <p>In terms of the strategy to manage and mitigate risks, an outline CoCP along with outline management plans has been submitted with the application, The Applicants have made a commitment (CoT35 of Volume 1, Annex 5.3: Commitments Register of the ES (REP2-010)) to develop details CoCP(s) in line with the outline CoCP. As part of this measures and management plans to manage risks for numerous topics noise and vibration, air quality, ecology, traffic and transport and agricultural land. The detailed CoCP(s) are secured by Requirement 8 of Schedules 2A and 2B of the draft DCO (REP2-004). Detailed Construction Noise and Vibration Management Plan(s) will be implemented by the Applicants as approved by the relevant local planning authorities in consultation with the relevant statutory stakeholders, as appropriate.</p>

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REP1-227 6.6	The current information regarding the proposed corridor crossing of the River Ribble remains insufficiently defined. No updated archaeological or heritage assessments have been provided to enable a robust evaluation of the potential impacts associated with the proposed construction methodology. The Council reiterates its concern that the proposed measures lack sufficient clarity, raising further doubts about whether the associated actions, mitigation strategies, and compensation mechanisms can be appropriately secured, effectively implemented, and robustly monitored.	The Applicants refer SRBC to the response to 2027.15 in Procedural deadline A Submission - Annex 3.2.19 to Response to RR – South Ribble Borough Council (RR-2027) (PDA-026).
REP1-227 6.7	In conclusion, the Council maintains that the current information fails to adequately address several significant issues and, based on the information presently available, is unable to confirm its position on the application. The Council remains committed to working collaboratively with the applicant to resolve all outstanding matters in a proportionate manner and to ensure that sufficient detail is provided to satisfy both statutory consultees and affected communities. Until such time as appropriate evidence is submitted, and all impacts are demonstrably mitigated—both during construction and post development—the Council will continue to raise its concerns with the Examining Authority. Accordingly, the Council reserves its final position at this stage.	The Applicants note these concerns and would welcome further discussion with SRBC regarding the above issues.