

MORGAN AND MORECAMBE OFFSHORE WIND FARMS: TRANSMISSION ASSETS

Applicants' response to Hearing Action Points of ISH2, ISH3 and CA2 due at Deadline 4



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Glossary

Term	Meaning
400 kV grid connection cables	Cables that will connect the proposed onshore substations to the existing National Grid Penwortham substation.
400 kV grid connection cable corridor	The corridor within which the 400 kV grid connection cables will be located.
Applicants	Morgan Offshore Wind Limited (Morgan OWL) and Morecambe Offshore Windfarm Ltd (Morecambe OWL).
Biodiversity benefit	<p>An approach to development that leaves biodiversity in a better state than before. Where a development has an impact on biodiversity, developers are encouraged to provide an increase in appropriate natural habitat and ecological features over and above that being affected.</p> <p>For the Transmission Assets, biodiversity benefit will be delivered within identified biodiversity benefit areas within the Onshore Order Limits. Further qualitative benefits to biodiversity are proposed via potential collaboration with stakeholders and local groups, contributing to existing plans and programmes, both within and outside the Order Limits.</p>
Code of Construction Practice	A document detailing the overarching principles of construction, contractor protocols, construction-related environmental management measures, pollution prevention measures, the selection of appropriate construction techniques and monitoring processes.
Commitment	This term is used interchangeably with mitigation and enhancement measures. The purpose of commitments is to avoid, prevent, reduce or, if possible, offset significant adverse environmental effects. Primary and tertiary commitments are taken into account and embedded within the assessment set out in the ES.
Construction Traffic Management Plan	A document detailing the construction traffic routes for heavy goods vehicles and personnel travel, protocols for delivery of Abnormal Indivisible Loads to site, measures for road cleaning and sustainable site travel measures.
Design envelope	A description of the range of possible elements and parameters that make up the Transmission Assets options under consideration, as set out in detail in Volume 1, Chapter 3: Project Description. This envelope is used to define the Transmission Assets for EIA purposes when the exact engineering parameters are not yet known. This is also referred to as the Maximum Design Scenario or Rochdale Envelope approach.
Development Consent Order	An order made under the Planning Act 2008, as amended, granting development consent.
Direct pipe	A cable installation technique which involves the use of a mini (or micro) tunnel boring machine and a hydraulic (or other) thruster rig to directly install a steel pipe between two points.
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.

Term	Meaning
Environmental Statement	The document presenting the results of the Environmental Impact Assessment process.
Evidence Plan Process	A voluntary consultation process with specialist stakeholders to agree the approach to, and information to support, the EIA and Habitats Regulations Assessment processes for certain topics.
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.
Intertidal area	The area between Mean High Water Springs and Mean Low Water Springs.
Intertidal Infrastructure Area	The temporary and permanent areas between MLWS and MHWS.
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 Authority	A body empowered by law to exercise various statutory functions for a particular area of the United Kingdom. This includes County Councils, District Councils and County Borough Councils.
Local Highway Authority	A body responsible for the public highways in a particular area of England and Wales, as defined in the Highways Act 1980.
Main rivers	The term used to describe a watercourse designated as a Main River under the Water Resources Act 1991 and shown on the Main River Map. These are usually larger rivers or streams and are managed by the Environment Agency.
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
Maximum design scenario	The realistic worst case scenario, selected on a topic-specific and impact specific basis, from a range of potential parameters for the Transmission Assets.
Mean High Water Springs	The height of mean high water during spring tides in a year.
Mean Low Water Springs	The height of mean low water during spring tides in a year.
Micro-tunnel / micro-tunnelling	A tunnelling technique involving the use of a hydraulic (or other) jacking rig and a mini (or micro) tunnel boring machine to install a concrete tunnel between two points.
Mitigation measures	This term is used interchangeably with Commitments. The purpose of such measures is to avoid, prevent, reduce or, if possible, offset significant adverse environmental effects.
Morecambe Offshore Windfarm: Generation Assets	The offshore generation assets and associated activities for the Morecambe Offshore Windfarm.

Term	Meaning
Morecambe Offshore Windfarm: Transmission Assets	The offshore export cables, landfall, and onshore infrastructure required to connect the Morecambe Offshore Windfarm to the National Grid.
Morecambe OWL	Morecambe Offshore Windfarm Limited is owned by Copenhagen Infrastructure Partners' (CIP) fifth flagship fund, Copenhagen Infrastructure V (CI V).
Morgan and Morecambe Offshore Wind Farms: Transmission Assets	<p>The offshore export cables, landfall, and onshore infrastructure for the Morgan Offshore Wind Project and the Morecambe Offshore Windfarm. This includes the offshore export cables, landfall site, onshore export cables, onshore substations, 400 kV grid connection cables and associated grid connection infrastructure such as circuit breaker compounds.</p> <p>Also referred to in this report as the Transmission Assets, for ease of reading.</p>
Morgan Offshore Wind Project: Generation Assets	The offshore generation assets and associated activities for the Morgan Offshore Wind Project.
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.
Morgan OWL	Morgan Offshore Wind Limited is a joint venture between JERA Nex bp (JNbp) and Energie Baden-Württemberg AG (EnBW).
National Grid Penwortham substation	The existing National Grid substation at Penwortham, Lancashire.
National Policy Statement(s)	The current national policy statements published by the Department for Energy and Net Zero in 2023 and adopted in 2024.
Offshore booster station	A fixed structure located along the offshore export cable route, containing electrical equipment to ensure bulk wind farm capacity can be fully transmitted to the onshore substations.
Offshore substation platform(s)	A fixed structure located within the wind farm sites, containing electrical equipment to aggregate the power from the wind turbine generators and convert it into a more suitable form for export to shore.
Offshore export cables	The cables which would bring electricity from the Generation Assets to the landfall.
Offshore export cable corridor	The corridor within which the offshore export cables will be located.
Offshore Permanent Infrastructure Area	The area within the Transmission Assets Offshore Order Limits (up to MLWS) where the permanent offshore electrical infrastructure (i.e. offshore export cables) will be located.
Offshore Order Limits	See Transmission Assets Order Limits: Offshore (below).
Offshore substation platform(s)	A fixed structure located within the wind farm sites, containing electrical equipment to aggregate the power from the wind turbine generators and convert it into a more suitable form for export to shore.
Onshore export cables	The cables which would bring electricity from the landfall to the onshore substations.
Onshore export cable corridor	The corridor within which the onshore export cables will be located.
Onshore Infrastructure Area	The area within the Transmission Assets Order Limits landward of MHWS. Comprising the offshore export cable corridor from MHWS to

Term	Meaning
	the transition joint bay, onshore export cable corridor, onshore substations and 400 kV grid connection cable corridor, and associated temporary and permanent infrastructure including temporary and permanent compound areas and accesses. Those parts of the Transmission Assets Order Limits proposed only for ecological mitigation and/or biodiversity benefit are excluded from this area.
Onshore Order Limits	See Transmission Assets Order Limits: Onshore (below).
Onshore substations	The onshore substations will include a substation for the Morgan Offshore Wind Project: Transmission Assets and a substation for the Morecambe Offshore Windfarm: Transmission Assets. These will each comprise a compound containing the electrical components for transforming the power supplied from the generation assets to 400 kV and to adjust the power quality and power factor, as required to meet the UK Grid Code for supply to the National Grid.
Preliminary Environmental Information Report	A report that provides preliminary environmental information in accordance with the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017. This is information that enables consultees to understand the likely significant environmental effects of a project, and which helps to inform consultation responses.
Renewable energy	Energy from a source that is not depleted when used, such as wind or solar power.
Scour protection	Protective materials to avoid sediment being eroded away from the base of the foundations due to the flow of water.
Substation	Part of an electrical transmission and distribution system. Substations transform voltage from high to low, or the reverse by means of electrical transformers.
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).
Transmission Assets Order Limits	The area within which all components of the Transmission Assets will be located, including areas required on a temporary basis during construction and/or decommissioning (such as construction compounds).
Transmission Assets Order Limits: Offshore	<p>The area within which all components of the Transmission Assets seaward of Mean Low Water Springs will be located, including areas required on a temporary basis during construction and/or decommissioning.</p> <p>Also referred to in this report as the Offshore Order Limits, for ease of reading.</p>
Transmission Assets Order Limits: Onshore	<p>The area within which all components of the Transmission Assets landward of Mean High Water Springs will be located, including areas required on a temporary basis during construction and/or decommissioning (such as construction compounds).</p> <p>Also referred to in this report as the Onshore Order Limits, for ease of reading.</p>

Acronyms

Acronym	Meaning
AIS	Air Insulated Switchgear
AOD	Above Ordnance Datum
BCA	Bilateral Grid Connection Agreement
CoCP	Code of Construction Practice
CoT	Project Commitment
CBRA	Cable Burial Risk Assessment
CfD	Contracts for Difference
CMS	Construction Method Statement
CSIP	Cable Specification and Installation Plan
CTMP	Construction Traffic Management Plan
DCO	Development Consent Order
DECC	Department of Energy and Climate Change
Defra	Department for Environment, Food and Rural Affairs
DESNZ	Department for Energy Security & Net Zero
dML	Deemed Marine Licence
EnBW	Energie Baden-Württemberg AG
EIA	Environmental Impact Assessment
EMP	Environmental Management Plan
EPP	Evidence Plan Process
ES	Environmental Statement
EWG	Expert Working Group
GIS	Gas Insulated Switchgear
HDD	Horizontal Directional Drilling
HGV	Heavy goods vehicle
HNDR	Holistic Network Design Review
HVAC	High Voltage Alternating Current
IALA	International Association of Marine Aids to Navigation and Lighthouse Authorities
IAQM	Institute of Air Quality Management
LAT	Lowest Astronomical Tide
MCA	Maritime and Coastguard Agency
MCZ	Marine Conservation Zone
MDS	Maximum Design Scenario

Acronym	Meaning
MHWS	Mean High Water Springs
MLWS	Mean Low Water Springs
MMO	Marine Management Organisation
MPS	Marine Policy Statement
MTBM	Mini (or micro) tunnel boring machine
NGESO	National Grid Electricity System Operator
NPS	National Policy Statement
NSIP	Nationally Significant Infrastructure Project
O&M	Operation and Maintenance
OSP	Offshore Substation Platform
OTNR	Offshore Transmission Network Review
PDE	Project Design Envelope
PEIR	Preliminary Environmental Information Report
PPP	Pollution Prevention Plan
PRoW	Public rights of way
SAC	Special Areas of Conservation
SAR	Search and Rescue
SPA	Special Protection Area
SNCBs	Statutory Nature Conservation Bodies
SSSI	Sit of Special Scientific Interest
SWMP	Site Waste Management Plan
TEP	Technical Engagement Plan
TJB	Transition Joint Bay
UK	United Kingdom
UXO	Unexploded Ordnance
WSI	Written scheme of investigation

Units

Unit	Description
%	Percentage
dB	Decibels
Kg	Kilogram
kHz	Kilohertz

Unit	Description
KJ	Kilojoules
km	Kilometres
km ²	Kilometres squared
kV	Kilovolt
m	Metres
m ²	Metres squared
m ³	Metres cubed
nm	Nautical mile
μPa	micropascal

1 The Applicants' response to Hearing Action Points due at Deadline 4

1.1 Introduction

- 1.1.1.1 This document addresses the Hearing Action Points raised by the Examining Authority at Issue Specific Hearing 2 on 29 July 2025 and 30 July 2025, Issue Specific Hearing 3 on 31 July 2025 and Compulsory Acquisition Hearing 2 on 1 August 2025 due at Deadline 4.

1.2 Applicants Response to Hearing Action Points due at Deadline 4

Table 1.1: Applicants responses to hearing action points from ISH2

HAP No.	Agenda item	For whom	Deadline due	Hearing Action Point (HAP)	Applicants' response
ISH2.1	General/cross-topic	Applicants & NWCP	Deadline 5	Submit a Statement of Common Ground (SoCG) with Newton with Clifton Parish Council.	<p>The Applicants are in the process of developing a Statement of Common Ground (SoCG) with Newton with Clifton and Freckleton Parish Councils.</p> <p>The most recent draft of the SoCG was shared with the parish councils on the 14 July 2025. A meeting has been scheduled for the 11 August 2025 for all parties to discuss and agree the status against the SoCG, with the aim to submit the SoCG at Deadline 5.</p>
ISH2.2	General/cross-topic	Applicants	Deadline 4	Provide a note on recent progress with Natural England in relation to offshore matters and the list of application documents that the applicants have agreed to update at D5.	<p>The Applicants have responded to each of the offshore matters raised by Natural England as highlighted within the Applicants' Response to Interested Parties' Responses to the Examining Authority's Written Questions (ExQ1) (S_D4_2.6), which notes recent progress made through ongoing engagement with Natural England. In addition, for each point, the Applicants have clearly identified any updates required to application documents for submission at Deadline 5, to ensure that both Natural England and the Examining Authority are fully informed of the relevant changes.</p> <p>The following documents will be updated at D5 to close out NE comments raised at D3:</p> <p>Volume 1, Chapter 3: Project Description (REP2-008)</p>

HAP No.	Agenda item	For whom	Deadline due	Hearing Action Point (HAP)	Applicants' response
					<p>Volume 1, Annex 5.5: Cumulative screening matrix and location plan (REP1-020)</p> <p>Volume 2, Chapter 1: Physical process (APP-042)</p> <p>Volume 2, Chapter 2: Benthic subtidal and intertidal ecology (APP-045)</p> <p>Volume 2, Chapter 5: Offshore Ornithology (APP-053),</p> <p>Volume 2, Chapter 4: Marine mammals (APP-050)</p> <p>Volume 3, Chapter 4: Onshore and intertidal ornithology (APP-090)</p> <p>HRA Screening Report (APP-018)</p> <p>HRA Stage 2 Information to Support an Appropriate Assessment Part Three (APP-017) (for onshore and offshore ornithology)</p> <p>MCZ Screening and Stage 1 Assessment Report (APP-019)</p> <p>Outline Cable Specification and Installation Plan (CSIP) (REP2-022)</p> <p>Dredging and Disposal - Site Characterisation Plan (APP-227)</p>
ISH2.3	General/cross-topic	Applicants	Deadline 4 (change request action)	Provide an overlay plan illustrating the football pitches layout at Blackpool Road Recreation Ground combined with the change request (change 4(b)) in the	The Applicants have provided an overlay plan illustrating the football pitches layout at Blackpool Road Recreation Ground combined with Change 4b of the change request application within the Change Request Report (Figure 1 in S_MMCR_3) submitted at Deadline 4.

HAP No.	Agenda item	For whom	Deadline due	Hearing Action Point (HAP)	Applicants' response
				Change Request Application.	
ISH2.4	General/cross-topic	Applicants	Pre-Deadline 4 (change request action)	Update the change request notification document [AS-081] to provide an explanation of the construction access change required as part of change 4 (reduction in order limits at the airport).	The Applicants provided an update to the change request notification document (AS-081) on Friday 1st August. The update has been accepted into the examination on 1st August and is available on the PINS website.
ISH2.5	General/cross-topic	Applicants	Deadline 4 (change request action)	Change Request Application to include a topic by topic summary of the effects of the change request on the conclusions of the Environmental Statement.	The Applicants have provided a topic-by-topic summary of the effects of the change request on the Environmental Statement at Deadline 4 (S_MMCR_3).
ISH2.6	Aviation and Radar	Applicants	Once the cooperation agreement is completed	Submit a joint statement, which explains how relevant aviation NPS policy has been met and how Blackpool Airports' concerns have been alleviated.	The Applicants and BAOL will provide a joint statement following signature of the cooperation agreement or an update at Deadline 5.

HAP No.	Agenda item	For whom	Deadline due	Hearing Action Point (HAP)	Applicants' response
ISH2.7	Aviation and Radar	Applicants	Deadline 5	Provide a note to explain what information has been submitted to date in relation to bird strike and how this fits with the Environmental Statement.	The Applicants will provide a note in relation to bird strike and how this relates to Volume 3, Chapter 11: Aviation and Radar of the Environmental Statement at Deadline 5.
ISH2.8	Aviation and Radar	Applicants	Deadline 4	Provide clarification on the applicants' comments in the response to hearing action points due at deadline 1 [REP1- 037] in relation to when the bird strike risk was first raised by BAE when BAE's concerns and details included the Consultation Report Annex - Statutory consultation summary of responses and Applicants' regard (Part 2 of 2) (APP-188).	<p>The Applicants note that the S42 response from BAE Systems within the Consultation Report Annex – Statutory consultation summary of responses and Applicant's regard (Part 2 of 2) (APP-188) makes no specific or explicit mention of "bird strike". The BAE response relates to the potential risk to management of wildlife hazards and attractants, but the Applicants had understood that this was primarily in response to the Onshore and Intertidal Net Gain Enhancement Plan identified within the Preliminary Environmental Information Report, and the enhancement measures proposed for waterbirds (TA_0025_003_231123).</p> <p>In response to this concern, the Applicants refined the ecological mitigation areas and biodiversity benefit areas as far as possible away from Warton Aerodrome, as detailed in the Site Selection of the Environmental Mitigation and Biodiversity Benefit Areas (REP2-046). Following submission of the application, the Applicants met with BAE Systems on 31st October 2024 to present the new areas and were informed that BAE had no concerns in relation to their siting. The Applicants concluded that this validated the approach to scope BAE Systems out of the aviation and radar impact assessment.</p> <p>The Applicants note that the response to TA_0025_003_231123 in APP-188 states that the biodiversity benefit, mitigation and enhancement has been sited outside of the wildlife zone. This is not</p>

HAP No.	Agenda item	For whom	Deadline due	Hearing Action Point (HAP)	Applicants' response
					<p>correct as these areas are within the 13 km radius wildlife management area.</p> <p>The Applicants confirm that the response to ISH1_40 within REP1-037 is correct in stating that the need for potential bird strike mitigation requirements was not raised during pre-application consultation and the Applicants were only made aware of this following submission of BAE Systems' Relevant Representation (RR-208).</p> <p>The Applicants reassert that they are committed to working with BAE Systems to provide them with the necessary information to undertake all aspects of their safeguarding assessment, including details for bird strike mitigation and will do so as part of continued engagement throughout the Examination.</p>
ISH2.9	Aviation and Radar	Applicants	Deadline 4	Provide a submission explaining how the applicants are complying with NPS EN-1 paragraph 5.5.41, including whether any requirement securing the Wildlife Hazard Management Plan meets tests for conditions including reasonable possibility/ capability of being successfully discharged.	<p>The Applicants note that NPS EN-1 paragraph 5.5.41 states the following in relation to bird strike:</p> <p>"Consideration of developments near aerodromes should take into account the following factors:</p> <p>Bird Strike Risk – Aircraft are vulnerable to wildlife strike, in particular bird strike. Birds and other wildlife may be attracted to the vicinity of an aerodrome by various types of development, for example, large buildings with perching/roosting opportunities for birds. It is therefore important that infrastructure, buildings and other elements from energy installations, as well as environmental mitigation are designed in such a way so as not to increase the bird strike risk to the airport for developments within 13km (this can vary)"</p> <p>The proposed design of the Transmission Assets are highly unlikely to materially alter the existing ornithological baseline (which already fluctuates seasonally and annually). The Applicants emphasise that</p>

HAP No.	Agenda item	For whom	Deadline due	Hearing Action Point (HAP)	Applicants' response
					<p>the design of the Transmission Assets will not increase the bird strike risk to Warton Aerodrome or Blackpool Airport. Therefore, the Applicants consider that this policy has been complied with.</p> <p>The Applicants draw attention to that fact that there is already a bird strike risk managed at Warton Aerodrome via mitigation which is the application of the existing Wildlife Hazard Management Plan (as referred to in BAE's response to the Examining Authority's written questions (REP3-073). Notwithstanding the Applicants' underlying position that the design of the Transmission Assets will not increase the bird strike risk, the mitigation measures proposed in the outline Wildlife Hazard Management Plan (REP3-065) will add an additional layer of certainty that no new birds are introduced to the area specifically as a result of the Transmission Assets. The Applicants maintain that in the unlikely event there were additional birds attracted to the area, that BAE will be able to manage this through the existing mitigation framework operated by Warton Aerodrome thereby controlling any additional potential risk.</p> <p>The Applicants will continue to engage with Blackpool Airport and BAE systems where appropriate in relation final design, monitoring and mitigations to ensure any risk of bird strike is mitigated.</p> <p>This should result in no overall increase to bird strike risk, and the Secretary of State can therefore be satisfied that NPS EN-1 para 5.5.41 has been complied with.</p> <p>The Applicants confirmed at ISH2 that Blackpool Airport accept the proposed approach to management of bird strike risk, and that the outline Wildlife Hazard Management Plan is the mechanism to deliver appropriate mitigation. Despite the operational differences between the two aerodromes (see response to ISH2.10 below) Blackpool Airport are comfortable with the proposed approach, therefore the ExA</p>

HAP No.	Agenda item	For whom	Deadline due	Hearing Action Point (HAP)	Applicants' response
					<p>can take comfort that there is a clear and reasonable possibility that BAE Systems should also be able to reach this position.</p> <p>The Applicants reassert that they are committed to working with BAE Systems to provide them with the necessary information to undertake all aspects of their safeguarding assessment, including details for bird strike mitigation and will do so as part of continued engagement throughout the Examination.</p> <p>The Applicants do not think it appropriate to resolve aviation matters via requirement within the draft DCO. The necessary mitigation is secured through the approval of the outline ecological management plan which, in respect of wildlife hazard management under requirement 12(1) (c) is subject to the approval of both BAOL and BAE. Based on the agreement reached with BAOL, the Applicants are confident that suitable measures can be agreed with BAE and therefore that this requirement can be discharged at the appropriate time.</p>
ISH2.10	Aviation and Radar	BAE, Blackpool Airport or the Applicants (optional)	Deadline 4	Submit a document highlighting similarities and differences between Blackpool Airport and Warton Aerodrome.	<p>The Applicants provided a response at ISH2 that they do understand the operational differences between Blackpool Airport and Warton Aerodrome. However, the Applicants note that both Airports are subject to the same civil aviation authority guidance, CAP 772, regarding the management of wildlife hazards. The requirements of CAP 772 guidance is the basis of the drafting of the OWHMP. CAP 738 relates to the safeguarding of aerodromes and CAP 795 concerns safety management systems. The Applicant considers the only difference for Warton Aerodrome is related to of their military licence, which requires Warton Aerodrome to comply with bird strike management (3270 Aerodrome Wildlife Control). The Applicants note that this replicates the CAP 772 process by outlining the need for a baseline and attractant risk assessment, the existing aerodrome habitat management process and the aerodrome current bird strike</p>

HAP No.	Agenda item	For whom	Deadline due	Hearing Action Point (HAP)	Applicants' response
					assessment matrices. Therefore, it replicates the same guidance the Applicants have applied to Blackpool Airport.
ISH2.11	Aviation and Radar	BAE	Deadline 4 and submitted to the applicants as soon as practicable	Provide documents/ information requested by the applicants currently subject to the non-disclosure agreement with the applicants.	
ISH2.12	Ecology	Applicants	Deadline 4	Submit a note clarifying the current position with Natural England (re Adverse Effect On Integrity) for the Ribble and Alt Estuary SPA and the Fairhaven saltmarsh mitigation area.	The Applicants have provided a technical note for this action as an annex, S_D4_9.1 at Deadline 4.
ISH2.13	Ecology	Applicants	Deadline 4	Update the draft Development Consent Order (dDCO) and explanatory memorandum to include a without prejudice biodiversity benefit requirement in square brackets.	The Applicants have provided an updated draft Development Consent Order and Explanatory Memorandum that includes this action at Deadline 4 (C3/F06).

HAP No.	Agenda item	For whom	Deadline due	Hearing Action Point (HAP)	Applicants' response
ISH2.14	Ecology	Applicants	Deadline 4	Submit a note identifying where all the different elements of peat soils and peat land habitats have been considered through the Environmental Statement and provide responses to Natural England points raised on this topic.	The Applicants have provided a technical note for this action, at Deadline 4 (S_D4_15)
ISH2.15	Ecology	Applicants	Deadline 4	Provide a map detailing the Phase 1 habitat survey coverage.	The Applicants have provided a technical note for this action and in response to ExQ1 Q6.1.1, Phase 1 Habitat Survey Coverage at Deadline 4 (S_D4_12)
ISH2.16	Ecology	FBC	Deadline 4	Provide information on Fylde Borough Council's usage of the access off Clifton Drive North to the existing sand winning compound.	
ISH2.17	LVIA	Applicants	Deadline 5	Provide a cross section illustrating the height of the onshore substations, existing topography and indicative finished ground level for the land at the Morecambe	The Applicants note this action for Deadline 5.

HAP No.	Agenda item	For whom	Deadline due	Hearing Action Point (HAP)	Applicants' response
				and Morgan onshore substations paying particular attention to how construction of the Morgan substation will approach the steep descent in plot number 12-027A.	
ISH2.18	LVIA	Applicants and Fylde Borough Council	Deadline 4	Provide a summary of their respective positions concerning any effects on the areas of separation.	<p>The Applicants position is that an Area of Separation (which is a local planning policy designation) by definition is a well defined space between settlements. As confirmed by the Fylde Local Plan to 2032:</p> <p>“An Area of Separation is designed to preserve the character and distinctiveness of individual settlements by restricting inappropriate development that would result in the coalescence of two distinct and separate settlements”</p> <p>The wording of Fylde borough Council's Strategic Policy GD3 (Areas of separation) goes on to say that:</p> <p>“Development will be assessed in terms of its impact upon the Area(s) of Separation....”</p> <p>Whilst an Area of Separation may be used to support a Green Belt designation, i.e. as a further exclusion zone around the Green Belt, it cannot also by reference to its own definition set out above and as shown in the Local Plan Policies Map, have an undefined and unidentified exclusion zone beyond its borders. The Area of Separation is not the area to be protected which would justify such an exclusion zone, it is the space between places that an Area of Separation seeks to protect. Such a space needs clearly defined</p>

HAP No.	Agenda item	For whom	Deadline due	Hearing Action Point (HAP)	Applicants' response
					<p>boundaries as provided for in the Fylde Local Plan to 2032 Policies Map.</p> <p>Users of the Local Plan (and its associated Policies Map) are entitled to read it at its face value and to assert that there is an “implied area of separation around an area of separation” would not be in accordance with the Local Plan or Policies Map. The Transmission Assets are outwith the Area of Separation and as a result do not, and cannot as a matter of policy, have an impact on it.</p>
ISH2.19	LVIA	Applicants	Deadline 4	Provide a timetable for engagement with Fylde Borough Council and Lancashire County Council in respect of the outline Design Principles.	The Applicants have provided a response to this action as an annex, S_D4_9.2 at Deadline 4.
ISH2.20	LVIA	Applicants	Deadline 4	Update the green belt technical note to address matters discussed at ISH2 including ‘other harms’, the wording for community benefit and quantification of harm.	The Applicants have provided an updated Green Belt Technical Note that includes this action at Deadline 4 (S_D3_12/F02).
ISH2.21	LVIA	Applicants & LPAs	Deadline 5	Include in the next SoCG any areas of agreement/disagreement on the outline Landscape Management Plan,	The Applicants note this action for Deadline 5.

HAP No.	Agenda item	For whom	Deadline due	Hearing Action Point (HAP)	Applicants' response
				Landscape and Visual Impact Assessment and green belt technical note.	
ISH2.22	Hydrology and Flood Risk	Applicants	D4	Provide an update to the Surface and Groundwater Management Plan and Outline Operational Drainage Management Plan to account for updated Standard 6 and Standard 7 of the National Standards for SuDS.	The Applicants have submitted at Deadline 4, an updated Outline Surface Water and Groundwater Management Plan (J1.9/F02) and the Outline Operational Drainage Management Plan (J10/F02) which includes reference to the National Standards for Sustainable Drainage Systems (SuDS) (Department for Environment, Food & Rural Affairs (DEFRA, 2025)).
ISH2.23	Hydrology and Flood Risk	Applicants	D4	Submit an updated FRA in response to comments received from the Environment Agency.	The Applicants have provided an updated Flood Risk Assessment that includes this action at Deadline 4 (F3.2.3/F04).
ISH2.24	Offshore Ecology	Applicants	D4	Update the Commitments Register to confirm that there will be no scour protection and no cable protection between MLWS and MHWS.	The Applicants have updated the Commitments Register at Deadline 4 (F1.3.5/F05) to include CoT133 "No cable/scour protection shall be permanently deployed in the intertidal area between Mean Low Water Springs (MLWS) and Mean High Water Springs (MHWS)".

HAP No.	Agenda item	For whom	Deadline due	Hearing Action Point (HAP)	Applicants' response
ISH2.25	Offshore Ecology	Applicants	D4	Submit updated commitment agreed with the MMO concerning removal of infrastructure.	The Applicants interpret this HAP to refers to the Applicants statement that the draft DCO will be updated to prohibit rock dump in the Fylde MCZ. The Applicants have made this update to the draft DCO submitted at Deadline 4 (C1/F06).
ISH2.26	Offshore Ecology	Applicants		Update the project description and any other changes to the application documents to enable Natural England to undertake a further review of the same.	Please see the Applicants' response to HAP ISH2.2 above.
ISH2.27	Offshore Ecology	Applicants	D4	Provide a response to Natural England's Responses to the Examining Authority's written questions (REP3-095) to address Natural England's concerns so it is clear how the applicant has assessed and addressed the impact of the proposed development.	Please see the Applicants' response to HAP ISH2.2 above.
ISH2.28	Offshore Ecology	Applicants	D6	Target a final SoCG with Natural England by	The Applicants confirm that they will target submission of a final SoCG with Natural England for Deadline 6.

HAP No.	Agenda item	For whom	Deadline due	Hearing Action Point (HAP)	Applicants' response
				D6 regarding offshore matters.	
ISH2.29	Offshore Ecology	Applicants	D4	<p>Update the commitments register including reference to the following:</p> <p>No operational and maintenance activities within the Special Protection Area plus 2km buffer during winter months</p> <p>That marine recovery fund will be prioritised</p> <p>Cable protection for 10 years outside the Marine Conservation Zone</p> <p>Post construction benthic monitoring and sampling</p>	<p>The Applicants have updated the Commitments Register at Deadline 4 (F1.3.5/F05) to include the following new commitments:</p> <p>CoT133: No cable/scour protection shall be permanently deployed in the intertidal area between Mean Low Water Springs (MLWS) and Mean High Water Springs (MHWS).</p> <p>CoT134: As part of the detailed design process, micro-siting of the offshore export cables within the offshore export cable corridors will be considered where successful burial could pose a challenge or where a higher risk of remedial works such as external cable protection may be required.</p> <p>CoT135: The Applicants will not plan routine O&M activities in the original Liverpool Bay SPA (as designated in 2010), including a 2 km buffer between November and March (inclusive) unless in urgent circumstances.</p> <p>CoT136: Should benthic compensation be required, the Marine Recovery Fund will be the preferred and prioritised option, and the project-led options would only be considered where the Marine Recovery Fund option is not made available to the Applicants.</p> <p>The commitment to timing limitations on the deployment of cable/scour protection inside and outside the Fylde MCZ has not been captured in the Commitments Register, as the Applicants have secured this in the updated Outline Offshore Operations and Maintenance Plan (OOMP) submitted at Deadline 4 (J19/F02). Additionally, CoT135 above has also been captured in the updated Outline OOMP.</p>

HAP No.	Agenda item	For whom	Deadline due	Hearing Action Point (HAP)	Applicants' response
					The commitment to a benthic monitoring programme in the Fylde MCZ has not been captured in the Commitments Register as the Applicants have secured this in the updated Offshore In Principle Monitoring Plan (IPMP) submitted at Deadline 4 (J20/F03).
ISH2.30	Offshore Ecology	Applicants	D4	Update the Cable Specification and Installation Plan in response to Natural England's concerns as to potential for burying cables	The Applicants interpret this HAP to refer to the request by Natural England to include in the Commitments Register, the commitment made in the Outline cable specification and installation plan to prioritise installation of cables in areas that maximise successful burial and minimise the need for cable protection. The Applicant has made this update to the Commitments Register (F1.3.5/F05; see CoT134 in the response to HAP ISH2.29 above).
ISH2.31	Land Use and Recreation	Applicants	D4	Submit an explanatory memorandum on the draft section 106 (s106) in relation to the land at Blackpool Road Recreation Ground.	The Applicants have provided a section 106 memorandum document that includes this action at Deadline 4 (S_D4_16).
ISH2.32	Land Use and Recreation	Applicants	D4	Submit the s106 Agreement in relation to Blackpool Recreation Ground (either in agreed form or in a form representing progress of negotiations.	The Applicants have provided a section 106 memorandum document that includes this action at Deadline 4 (S_D4_16).
ISH2.33	Land Use and Recreation	Applicants & FBC	Ongoing	Engage with St Annes' Football Club regarding	The Applicants note this ongoing action.

HAP No.	Agenda item	For whom	Deadline due	Hearing Action Point (HAP)	Applicants' response
				alternative pitch locations.	
ISH2.34	Land Use and Recreation	FBC	Ongoing	To engage with the applicants on the s106 Agreement including provision of information on the skate park.	
ISH2.35	Land Use and Recreation	Applicants	D4	Provide a note to explain how the section 132 (open space) test has been met in relation to the Blackpool Road Recreation Ground, including in relation to permanent rights and Restrictive Covenants being sought (plots 04-014 and 04-016).	<p>In relation to the construction stage, the Applicants would refer to their response to ExA Written Question 5.1.26, which sets out that for construction activities, Section 132 would not be engaged on the basis that such activities would be carried out under temporary possession powers (and Section 132 does not apply to temporary possession, but to “the compulsory acquisition of a right over land to which this section applies by the creation of a new right over land”).</p> <p>The Applicants agree that the Section 132 test is engaged in relation to the permanent new rights (including the restrictive covenants) which the proposed DCO includes powers to acquire. The Applicants note that this Hearing Action Point specifically relates to plots 04-014 and 04-016 (REP1-004) but would note that this response also applies to 04-013 and 04-015 (REP1-004), which also comprise part of the Blackpool Road Recreation Ground.</p> <p>There are no proposed works, or rights packages, in respect of any open space land (including the Blackpool Road Recreation Ground) which would result in the current use of land as open space being restricted in a permanent way which would make that land less advantageous to users as open space. Any works within the open space land will be temporary, however the Applicants do acknowledge that the rights to be acquired are of a permanent nature (if indeed any works are needed, given that buried cables are not expected to</p>

HAP No.	Agenda item	For whom	Deadline due	Hearing Action Point (HAP)	Applicants' response
					<p>require any routine maintenance on an ongoing basis following construction). The Applicants would refer to their response to ExA Written Question 5.1.26, which provides precedent from numerous projects where similar permanent rights were acquired and where it was concluded that the Section 132(3) test (that the land is “no less advantageous” to those with rights to use the open space or the public, when burdened with the right) was met.</p> <p>Specifically in relation to the restrictive covenant elements of the permanent rights, which were the subject of discussion at CA Hearing 2, these are set out in the table below. The Applicants acknowledge that these will be a permanent restriction in relation to the activities which can be undertaken on the land. However, the Applicants would emphasise that these will in no way interfere with the use of the land as open space and so will not make the land less advantageous to the users of the open space. These prevent things such as the erection of buildings and carrying out operations which might damage or interfere with the cabling once installed. The current use of the Blackpool Road Recreation Ground and its continued use as public open space would not be inhibited by the restrictive covenants which are sought as part of the permanent rights over these plots. The Applicants have also had written confirmation from Fylde Council that they are content with the restrictions proposed in the voluntary agreement that mirror those sought under the CA powers.</p> <p>The Applicants would also emphasise that the nature of the restrictive covenants sought aligns with those which were granted as part of the Mona Offshore Wind Farm DCO, and the Examining Authority's recommendation report (which the Secretary of State agreed with) concluded that “the restrictive covenants would be entirely compatible with the use of the 4 plots as open space”, when considering these restrictive covenants in light of the Section 132(3) test.</p>

HAP No.	Agenda item	For whom	Deadline due	Hearing Action Point (HAP)	Applicants' response
					<p>The current restrictive covenants over each of the Blackpool Road Recreation Ground plots are set out below. Notwithstanding the above, the Applicants acknowledge that the restrictive covenants in relation to plot 04-015 are currently less restrictive than those in place over 04-013, 04-014 and 04-016, as they relate to trenchless installation only. In order to address the concerns raised and ensure that there are not unnecessary restrictions to any part of the Blackpool Road Recreation Ground, the Applicants are in the process of preparing a suite of bespoke cable rights/restrictive covenants for all four of these plots. Further detail on this suite of rights/restrictive covenants will be submitted at Deadline 5, and the Applicants will ensure that consequential updates are carried across to the dDCO, Statement of Reasons, Book of Reference and any other relevant documents, which will also be submitted at Deadline 5.</p> <p>For completeness, the Applicants note that Article 2(2) of the draft DCO clarifies that restrictive covenants are a right over land: “(2) References in this Order to rights over land include references to rights to do or to place and maintain, anything in, on or under land or in the airspace above its surface and references in this Order to the imposition of restrictive covenants are references to the creation of rights over land which interfere with the interests or rights of another and are for the benefit of land which is acquired under this Order or is otherwise comprised in the Order land.” This is a common provision in DCOs, most recently included in identical terms in the Mona Offshore Wind Farm DCO.</p> <p>Current restrictive covenants over plots 04-013, 04-014 and 04-016:</p> <p>A restrictive covenant over the land for the benefit of the remainder of the Order land to:</p>

HAP No.	Agenda item	For whom	Deadline due	Hearing Action Point (HAP)	Applicants' response
					<p>prevent anything to be done in or upon the land or any part thereof for the purpose of the erection of any buildings or construction, erection or works of any kind (including the foundations or footings thereto);</p> <p>prevent anything to be done by way of hard surfacing of the land with concrete of any kind or with any other material or surface whatsoever without the consent in writing of the undertaker (such consent not to be unreasonably withheld or delayed if the proposed surfacing would not cause damage to relevant part of the authorised project nor make it materially more difficult or expensive to maintain the authorised);</p> <p>prevent anything to be done by way of excavation of any kind in the land or any activities which would alter, increase or decrease ground cover or soil levels in any manner whatsoever save as are reasonably required for agricultural activities (being ploughing to no deeper than 0.6m for the purposes of arable farming) or are reasonably required to be carried out by any statutory undertaker in order to exercise their statutory functions or rights in relation to their apparatus (if any) within the land without the consent in writing of the undertaker;</p> <p>prevent the planting or growing within the land of any trees, shrubs or underwood without the consent in writing of the undertaker (such consent not to be unreasonably withheld or delayed provided that the proposed trees, shrubs or underwood would not cause damage to the relevant part of the authorised project nor make it materially more difficult or expensive to access and maintain the relevant part of the authorised project);</p> <p>prevent anything being done which may interfere with the free flow and passage of electricity or telecommunications through the cables or support for the authorised project;</p>

HAP No.	Agenda item	For whom	Deadline due	Hearing Action Point (HAP)	Applicants' response
					<p>prevent the carrying out of operations or actions (including but not limited to blasting and piling) which may obstruct, interrupt, or interfere with the exercise of the rights or damage authorised project; and</p> <p>prevent any activity which would in the reasonable opinion of the undertaker result in the disturbance of ecological mitigation areas or areas of habitat creation or enhancement including any ploughing or grazing without the prior written consent of the undertaker</p> <p>Current restrictive covenants over plot 04-015</p> <p>A restrictive covenant over the land for the benefit of the remainder of the Order land to:</p> <p>prevent anything to be done in or upon the land or any part thereof for the purpose of the erection of any buildings or construction, erection or works of any kind (including the foundations or footings thereto);</p> <p>prevent anything to be done by way of excavation of any kind in the land or any activities which would alter, increase or decrease ground cover or soil levels in any manner whatsoever save as are reasonably required to be carried out by any statutory undertaker in order to exercise their statutory functions or rights in relation to their apparatus (if any) within the land or rights in relation any highway or railway infrastructure on the land (if any) and will not damage, undermine or interfere with the cables;</p> <p>prevent the planting or growing within the land of any trees, shrubs or underwood without the consent in writing of the undertaker (such consent not to be unreasonably withheld or delayed provided that the</p>

HAP No.	Agenda item	For whom	Deadline due	Hearing Action Point (HAP)	Applicants' response
					<p>proposed trees, shrubs or underwood would not cause damage to the relevant part of the authorised project nor make it materially more difficult or expensive to access and maintain the relevant part of the authorised project);</p> <p>prevent anything being done which may interfere with the free flow and passage of electricity or telecommunications through the cables or support for the authorised project; and</p> <p>to prevent carrying out operations or actions (including but not limited to blasting and piling) which may obstruct, interrupt, or interfere with the exercise of the rights or damage the authorised project</p>
ISH2.36	Land Use and Recreation	Applicants	D4	Clarify position concerning the Starr Gate junction and remove powers from the dDCO.	<p>The Applicants have previously confirmed and updated the outline Code of Construction Practice (REP3-018) to clarify the use of Starr Gate for construction which will be by light vehicles only and for boat launches. That use is compatible with the existing uses of Starr Gate. In response to ongoing discussions with Blackpool Borough Council, the Applicants have further updated the draft DCO (C1/F06) at Deadline 4 to remove street work powers at Starr Gate (as detailed in the Schedule of Changes to the draft DCO) from Schedules 3A, 3B, 4A and 4B. In addition, as confirmed at ISH3, the Applicants have also removed the first two rows of Schedules 5A and 5B (public rights of way to be temporarily closed or restricted). The Applicants use of Starr Gate will not have an impact on the public right of way at Starr Gate and therefore the powers under Article 12 to temporarily close, alter or divert a public right of way are not necessary. Similarly, Schedules 7A and 7B have been updated in the draft DCO (C1/F06) in relation to Starr Gate to confirm that the temporary possession powers would be exercised solely for access purposes with no element of street works.</p>

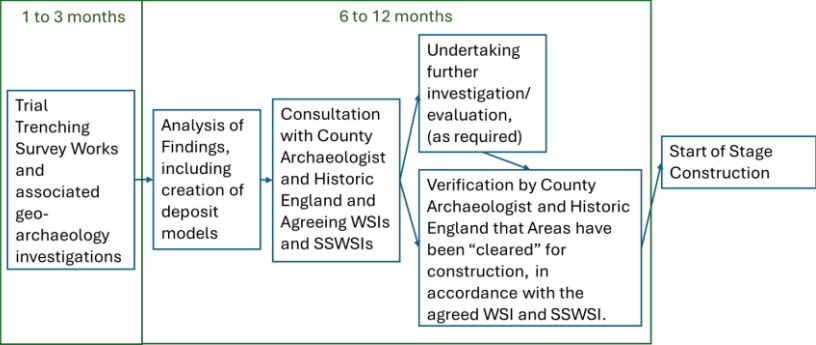
HAP No.	Agenda item	For whom	Deadline due	Hearing Action Point (HAP)	Applicants' response
ISH2.37	Land Use and Recreation	Applicants	D4	Review Statement of Reasons and ensure it covers the temporary diversion of bridleway 5-5-16.	The Applicants have updated the Statement of Reasons to include the plots related to the temporary diversion of bridleway 5-5-16. The Applicants would like to highlight that they have committed to installing the onshore export cables via trenchless techniques for sections of bridleway 5-5-16, in order to retain the mature trees along the boundary of the bridleway. This is secured through Sheet 20 of the Volume 1, Annex 3.2: Onshore Crossing Schedule (REP1-018). If it is possible to install the onshore export cable circuits via trenchless techniques, this temporary diversion may not be required.
ISH2.38	Land Use and Recreation	Applicants	D4	Provide a note currently referred to as the "Agricultural Holdings Indicative Mitigation Plan" explaining engagement with landowners and how construction will work in practice.	The Applicants have provided a response to this action as an annex, Agricultural Holdings Indicative Mitigation Plan (S_D4_9.3_ at Deadline 4.
ISH2.39	Noise	Tetra Tech	D4	Provide an explanatory note with input from Tetra Tech regarding how and why the conflict with Hoare Lea has arisen.	The Applicants have provided a response to this action as an annex, Tetra Tech Conflict of Interest Note (S_D4_9.4) at Deadline 4.

HAP No.	Agenda item	For whom	Deadline due	Hearing Action Point (HAP)	Applicants' response
ISH2.40	Socio-economics	Blackpool Borough Council	D4	Submit additional points on tourism not already covered in Blackpool Borough Council's local impact report.	
ISH2.41	Socio-economics	Applicants	D4	Submit the applicants' Local Tourism Assessment into examination.	Unfortunately it has not been possible in the time available to submit the local tourism assessment for Deadline 4. It has been concluded that it would be better to submit a completed assessment at Deadline 5 and take the opportunity to consult with the relevant local authorities on the scope of the assessment. It may be possible to submit the assessment before Deadline 5, however this will be at the discretion of the Examining Authority.
ISH2.42	Socio-economics	All LPAs	ASAP and no later than D5	Agree and report to the applicants which authority should be the approval body under Requirement 19 of Schedule 2A and 2B of the dDCO (Employment and Skills Plan), including an explanation of how this will work.	
ISH2.43	Traffic and Transportation	Applicants	D4	Submit a table on level of access use and use of crossing points with reference to HGV usage.	The Applicants have provided details of the forecast levels in response to this action as an annex at Deadline 4 (S_D4_9.5).

HAP No.	Agenda item	For whom	Deadline due	Hearing Action Point (HAP)	Applicants' response
ISH2.44	Traffic and Transportation	Applicants (a and b), LCC (a)	D5 D4	Provide a link by link specific note detailing the feasibility of 13 link routes and corridors to Lancashire County Council, which shall be agreed and submitted into examination by D5; and Applicants to provide a document containing outline steps to be taken to achieve the actions under (a).	The Applicants have provided details of the proposed steps to be taken to achieve the actions under (a) as an annex, at Deadline 4 (S_D4_9.5).
ISH2.45	Traffic and Transportation	Applicants	D4	Explain the interaction of Requirement 16 (Restoration) and the details contained in the outline Construction Traffic Management Plan in relation to highway restoration.	The Applicants have included additional clarification in relation to the processes for the restoration of accesses within an update to section 1.8.1 of the outline Construction Traffic Management Plan (J5/F03) submitted at Deadline 4.
ISH2.46	Traffic and Transportation	Applicants	D4	Append the proposed location of truck stops to the outline Construction Traffic Management Plan.	The Applicants have included details of the potential locations where HGVs can park/wait within an update to section 1.3.3 of the outline Construction Traffic Management Plan (J5/F03) submitted at Deadline 4.

HAP No.	Agenda item	For whom	Deadline due	Hearing Action Point (HAP)	Applicants' response
ISH2.47	Traffic and Transportation	Mr Barlow	D4	Submit full representation at D4 with proposals to mitigate the impact of traffic along Lower Lane	N/A
ISH2.48	Historic Environment	Applicants	D4	Provide a document detailing the trial trenching approach of the Transmission Assets against that taken by other Development Consent Order projects.	The Applicants have provided a trial trenching note in response to this action as an annex, Summary of trial trenching approaches in other DCO applications (S_D4_9.6) at Deadline 4.
ISH2.49	Historic Environment	Applicants	D4	Timetable of trial trenching and how it fits in with construction. The timetable will need to cover now until project implementation.	<p>In accordance with Requirement 11(2) of Schedules 2A and 2B to the draft DCO (REP3-009), the Applicants are preparing to undertake pre-commencement surveys to allow the production and discharge of each project's archaeological written scheme of investigations ("WSIs"), as is required by Requirement 11(1). The trial trenching will consist of approximately 400 archaeological trial trenching within the onshore order limits in 2026. The findings from these trenches will then inform what, if any, further investigations/evaluations may be required. The trenches will be prioritised in areas where the earliest stages of the projects' construction works are planned to take place. In descending priority, these are:</p> <p>Ecological mitigation areas;</p> <p>Onshore substations;</p>

HAP No.	Agenda item	For whom	Deadline due	Hearing Action Point (HAP)	Applicants' response
					<p>Landfall;</p> <p>Trenchless crossing compounds; and</p> <p>Remaining cable corridor.</p> <p>An indicative summary of the process that will be undertaken after trial trenching works, as mandated by Requirement 11, can be found in the figure, below. This process may be completed separately for each stage of each projects' constructions and these processes may or may not run in parallel.</p> <p>For example, the trenches for Project A's ecological mitigation areas may be completed and analysed first to allow a WSIs / SSWSIs to be agreed and execution of the ecological mitigation works (example: pond creation, etc) to proceed whilst the trenching, analysis, etc for later stages of Project A are still underway or yet to be started. Project B's archaeological trenching, etc to discharge Requirement 11 for its stages of construction may happen completely independently of Project A and at different times.</p>

HAP No.	Agenda item	For whom	Deadline due	Hearing Action Point (HAP)	Applicants' response
					
ISH2.50	Other matters	Applicants	D6	Review and update as necessary the Public Sector Equality Duty Statement.	The Applicants note this action for Deadline 6.
ISH2.51	Other matters	Orsted East Irish Sea Transmission	D4	<p>To provide:</p> <p>details on risk to the Orsted East Irish Sea Transmission Project posed by the Transmission Assets;</p> <p>any policy relevant to this position; and any proposed requirement drafting.</p>	

HAP No.	Agenda item	For whom	Deadline due	Hearing Action Point (HAP)	Applicants' response

Table 1.2: Applicants responses to hearing action points from ISH3

HAP No.	For whom	Deadline due	Hearing Action Point (HAP)	Applicants' response
ISH3.1	Applicants	Deadline 4 and ongoing	Carry out a thorough review of the draft Development Consent Order (DCO) for typographical and grammatical errors, including amending the reference to Welsh Guidance in Schedule 12 paragraph 7.	The Applicants have carried out a thorough review and made updates in the draft DCO (C1/F06). These can be seen in the track change Development Consent Order (C1/F06) submitted at Deadline 4, however, the Applicants will continue to carry out this review at future deadlines.
ISH3.2	Councils	Deadline 5	Councils to provide comments on the safeguards and controls in the outline plans to be updated at D4.	
ISH3.3	Applicants	Deadline 4	Consider updating the definition of 'maintain' in light of the definition in the Mona DCO, in the context of removal of buildings.	The Applicants have updated the definition of 'maintain' in the draft DCO (C1/F06) to exclude the removal of buildings associated with the onshore substations.
ISH3.4	Applicants	Deadline 4	Review how early planting landscaping works is controlled in the outline plans and provide an explanation of this.	<p>The Applicants note that early planting landscaping works are included in the dDCO (C1 F06) definition of onshore site preparation works, should the Applicants determine it appropriate and feasible to undertake these works in advance of the production of detailed plans and discharge of requirements.. The Applicants note that the control of early planting landscaping works is through the outline Landscape Management Plan (AS-050). Requirement 7(2) of Schedule 2A and 2B of the draft DCO (C1 F06) requires all onshore site preparation works to be carried out in accordance with the outline plans.</p> <p>The Applicants have proposed a programme of engagement with landscape officers from Fylde Borough Council and Lancashire County Council, provided in response to HAP ISH2.19 (S_D4_9.2). The Applicants will seek to identify specific locations for potential early planting landscape works, if opportunities to undertake early planting landscape works can be agreed, as part of the engagement on the outline Landscape Management Plan and subsequently update the outline Landscape Management Plan with this detail at Deadline 5. The Applicants note that the efficacy of the landscape mitigation proposals</p>

HAP No.	For whom	Deadline due	Hearing Action Point (HAP)	Applicants' response
				is not dependent on the provision of early planting landscape works and therefore the Transmission Assets have not committed to undertaking these works.
ISH3.5	Applicants	Deadline 4	Review the interpretation of Morgan and Morecambe Generation Assets and provide any updates considered necessary.	The Applicants have updated the definitions of Morgan and Morecambe Generation Assets within the draft DCO (C1/F06) to include the application references to provide additional clarity.
ISH3.6	Blackpool Borough Council	Deadline 4	Submit any further comments on articles 3 (Development consent etc. granted by the Order), 8 (Defence to proceedings in respect of statutory nuisance), 10 (Power to alter layout etc. of streets) and 47 (Inconsistent planning permissions).	
ISH3.7	Applicants	Deadline 4	Update Schedules 5A and 5B (Public rights of way to be temporarily closed or restricted– Project A/Project B) to align with the wording in article 12 (Temporary closure of public rights of way).	This amend has been made to align with the wording in Article 12. This can be viewed in the draft Development Consent Order updated at Deadline 4 (C1/F06).
ISH3.8	Applicants	Deadline 4 (Deadline 5 dependent on engagement with NH)	Update the Statement of Common Ground with National Highways to include comments on the draft DCO.	Please refer to the Applicant's response to submissions from National Highways at Deadline 3 (S_D4_2)
ISH3.9	Applicants	Notification at Deadline 4 (with further drafting at Deadline 5)	Review the drafting of article 19 (Human Remains) in light of the Mona Secretary of State decision and consider whether the article is needed and if so, provide justification at D4, any further drafting to follow by D5.	This HAP has been considered and article 19 has been removed. This is reflected in the draft Development Consent Order updated at Deadline 4 (C1/F06).
ISH3.10	Applicants	Deadline 4	Explain and provide justification for the inclusion of the general power for acquisition of rights	The 'general power' to acquire rights in the Order land included in Article 22(1)(a) and (b) is a standard inclusion in DCOs where compulsory

HAP No.	For whom	Deadline due	Hearing Action Point (HAP)	Applicants' response
			under article 22 (Compulsory acquisition of rights).	<p>acquisition powers are sought. Specifically, it allows an undertaker to compulsorily acquire rights in land instead of acquiring the freehold of land, which is provided for in the draft DCO by Article 20. In practical terms, this means that where land is shown on the land plans as freehold acquisition, an undertaker also has the power to use potentially less burdensome powers and instead acquire rights or impose restrictive covenants over that land. This is often referred to as allowing for the 'downgrading' of compulsory acquisition powers. It is fully in accordance with the overriding limitation on the exercise of compulsory acquisition powers in s122 of the 2008 Act, in that if at the time of exercise acquisition of freehold is not necessary, rights can be taken.</p> <p>The wording in Article 22(1) also makes clear that the purpose for which this power may be used is limited by reference to the purposes for which the Article 20(1) power may be used. Further, Article 20 is subject to Articles 22 and 29; and Article 22(1) is subject to paragraphs (2) and (3) of Article 22. Under this draft DCO, this means that the general power to acquire rights (and impose associated restrictive covenants) could only be used over the areas of land identified for freehold acquisition, being the substation sites, the permanent mitigation areas and the biodiversity benefit areas. This is because all other Order land is included within either Schedules 7A and 7B (as plots subject to temporary possession only under Article 29) or Schedules 8A and 8B (as plots subject to acquisition of rights and restrictive covenants only under Article 22(2) and 22(3)). This also means the undertakers could not acquire rights or impose restrictive covenants on those areas of land for purposes that are not connected to or required for the way in which that land can be used under the draft DCO i.e. as land for substations, mitigation areas or biodiversity benefit.</p> <p>The Applicants note that when The Sheringham Shoal and Dudgeon Extensions Offshore Wind Farm Order 2024 was originally made it sought to link the use of the general power to the Schedule in that Order which listed the land plots subject to acquisition of new rights etc. (i.e. the Schedule equivalent to Schedule 8 of the Transmission Assets</p>

HAP No.	For whom	Deadline due	Hearing Action Point (HAP)	Applicants' response
				draft DCO). However, this drafting was subsequently corrected and removed by The Sheringham Shoal and Dudgeon Extensions Offshore Wind Farm (Correction) Order 2024 on the basis that that drafting would have unintended consequences and would overly restrict how the undertakers could use their compulsory acquisition powers. The drafting would have prevented the undertakers from downgrading their compulsory acquisition powers where appropriate as the effect of the drafting would have meant the undertakers could no longer use powers to acquire rights over the land plots shown on the land plans as freehold acquisition because those land plots were not specified/included in column (1) of the relevant Schedule.
ISH3.11	Fylde Borough Council	Deadline 4	Provide details on the previous DCOs and articles with alternative drafting approaches to article 36 (Trees subject to preservation orders).	
ISH3.12	Applicants	Deadline 5	Review the controls included in the outline management plans in relation to the removal of trees and hedgerows and consider whether any drafting updates are required to article 35 (Felling or lopping of trees and removal of hedgerows) and article 36 (Trees subject to preservation orders), including any drafting provided by Fylde Borough Council.	
ISH3.13	Applicants	Deadline 5	Consider the need for article 45 (Requirements, appeals, etc.) in light of the Mona Secretary of State decision and explain how it interacts with Schedule 12(Approval of matters specified in requirements).	The Applicants have updated the draft Development Consent Order at Deadline 4 (C1/F06) to remove sub-paragraphs (2) and (3).
ISH3.14	Applicants	Deadline 4	Set out on a without prejudice basis what the drafting implications would be should the	The Applicants can confirm that there would be limited drafting implications on the draft DCO (REP3-009) should the Secretary of State decide to reduce the implementation period from 7 years to 5 years:

HAP No.	For whom	Deadline due	Hearing Action Point (HAP)	Applicants' response
			Secretary of State reduce the timescales for implementation from 7 years to 5 years.	<p>1. Requirement 1 of Schedules 2A and 2B would be amended as follows (for schedule 2B, replace Project A with Project B):</p> <p><i>Project A must commence no later than the expiration of sevenfive years beginning with the date this Order comes into force.</i></p> <p>2. Article 21 would be amended as follows: <i>After the end of the period of 75 years beginning on the day on which this Order is made—</i></p> <p>The Applicants reiterate that this response is on a without prejudice basis, as the Applicants have set out in full their representations as to why a 7 year implementation period is appropriate (see the Applicants' response to Question 1.1.4 of REP3-056 and paragraphs 1.6.6.8-1.6.6.10 and 1.7.2.5-1.7.2.6 of the Explanatory Memorandum (REP3-011)).</p>
ISH3.15	All Councils	Deadline 5	Engage on the outline plans, in particular the outline communications plan, noting the outline plans will be updated at D4.	
ISH3.16	Applicants	Deadline 4	Consider adding a notification of construction scenario into the outline communications plan.	The Applicants can confirm that they have included the notification of the construction scenario into the Outline Communications Plan (J1.1/F03).
ISH3.17	Fylde Borough Council	Deadline 4	To provide any comments on requirement25 (Onshore collaboration) and its interaction with other requirements.	
ISH3.18	Fylde Borough Council and the Applicants	Ongoing	Fylde Borough Council and the applicants to engage on the Outline Design Principles and requirement 4 (Substation works).	

HAP No.	For whom	Deadline due	Hearing Action Point (HAP)	Applicants' response
ISH3.19	Fylde Borough Council	Deadline 4	To provide comments on and proposed drafting for requirement 4 (Substation works), including design review.	
ISH3.20	Applicants	Deadline 5	Consider the drafting of requirement 4 (Substation works) in light of the discussions at ISH3 and comments from Fylde Borough Council provided at D4.	
ISH3.21	Applicants	Deadline 4	Consider whether requirement 17 (Control of operational artificial light emissions) should include details on lighting.	The Applicants have updated Requirement 17(1) within the draft DCO (C1/F06) to include reference to provision of details of artificial lighting. This drafting follows the approach taken in Requirement 25 (Control of artificial light emissions during operational phase) of The East Anglia ONE North Offshore Wind Farm Order 2025. Requirement 17(2) has also been updated to provide that any scheme approved must be implemented as approved and maintained during the operation of Work No. 21A.
ISH3.22	Applicants	Deadline 4	Review whether there is any statutory requirement for BAE to be consulted under requirement 4 (Substation works).	<p>The Applicants have reviewed the Town and Country Planning Act 1990 and the Development Management Procedure Order 2015 for any statutory requirement that BAE should be a consultee for discharge of planning conditions. The Applicants note that this procedure is covered by article 18 of the DMPO which directs to Schedule 4 and a table of organisations/individuals to be consulted in particular circumstances.</p> <p>The Applicants cannot see any reference here to an aerodrome or aviation organisation. Notwithstanding the above, should there be any requirement under the Town and Country Planning Act Regime, this would not apply in this instance, as the discharge of requirements under the NSIP regime is governed by the DCO as a statutory instrument itself and by the provisions in the Planning Act 2008. The Applicants are not aware of any equivalent provision in the Planning Act 2008. Therefore,</p>

HAP No.	For whom	Deadline due	Hearing Action Point (HAP)	Applicants' response
				<p>the Applicants submit there is no statutory requirement in this instance for BAE to be a consultee under requirement 4.</p> <p>The Applicants have, however, included specific consultation requirements with BAE Systems for Requirement 12. As stated during day 1 of Issue Specific Hearing 2 (S_D4_6), the Applicants believe this is appropriate and provides the necessary reassurance to BAE Systems.</p> <p>The Applicants have confirmed that they will be responsible for costs associated with the completion of any relevant safeguarding assessments. The Applicants reached out to BAE Systems on 29th July to begin discussions on a commercial agreement to secure the provision of appropriate funding for any relevant safeguarding assessments.</p>
ISH3.23	Applicants	Deadline 4	Review and update requirement 9(1) (Traffic and transport) to provide clarity around consultation bodies.	This HAP has been considered and an update can be viewed in the draft Development Consent Order updated at Deadline 4 (C1/F06).
ISH3.24	Lancashire County Council	ASAP (pre-D4)	Share proposed drafting with the Applicants for Requirement 11(2) (Onshore archaeology).	
ISH3.25	Applicants	Deadline 4	Consider the drafting of requirement 11(2)(Onshore archaeology) in light of comments raised by Lancashire County Council during ISH3.	This HAP has been considered and an update can be viewed in the draft Development Consent Order updated at Deadline 4 (C1/F06).
ISH3.26	Lancashire County Council	Deadline 4	Lancashire to provide comments on air quality, noise and vibration.	

HAP No.	For whom	Deadline due	Hearing Action Point (HAP)	Applicants' response
ISH3.27	Applicants	Deadline 4	Review wording of requirement 12(2)(Ecological management plan) and consider any updates.	Taking into account the Examining Authority's comments at ISH3, the Applicants have updated Requirement 12(2) within the draft DCO (C1/F06) to provide additional clarity.
ISH3.28	Fylde Borough Council	ASAP (pre-D4)	Submit comments to the Applicants on requirement 14 (Construction hours), noting Applicants commitment to remove Saturday afternoon working and requirement 16 (Restoration of land used temporarily for construction).	
ISH3.29	Applicants	Deadline 5	Review wording of requirement 16(Restoration of land used temporarily for construction) and consider whether it needs updating to provide for flexibility in the instance of sequential construction.	This HAP has been considered and an update can be viewed in the draft Development Consent Order updated at Deadline 4 (C1/F06).
ISH3.30	Applicants	Deadline 4	Review the implementation sub-paragraphs throughout Schedules 2A and 2B(Requirements – Project A/B) in light of Fylde Borough Councils comments about retention.	The Applicants have undertaken a review of the implementation clauses and, on the whole, consider the drafting to be standard and well precedented based on other recent DCOs. The Applicants have however updated Requirement 17(2) in Schedules 2A and 2B to provide for the operational artificial light emissions scheme to be implemented as approved and maintained during operation of the onshore substations. Requirement 20(2) in Schedules 2A and 2B has been updated in a similar way. Should Fylde Borough Council have other specific drafting amendments to put forward, the Applicants will consider those as appropriate for Deadline 5.
ISH3.31	Applicants	Deadline 4	Consider updating the drafting of requirement 24 (Amendments to approved details) to include reference to the impacts assessed within the environmental statement.	The Applicants have updated the Requirement 24 in the draft DCO (C1/F06) to include references to amendments being within the scope of work assessed by the environmental statement.

HAP No.	For whom	Deadline due	Hearing Action Point (HAP)	Applicants' response
ISH3.32	Applicants and Fylde Borough Council	Deadline 5	Engage on the drafting of paragraph (6) (Fees) of Schedule 12 (Approval of matters specified in requirements).	
ISH3.33	Newton with Clifton and Freckleton Parish Councils	Deadline 4	Provide drafting and a full justification for their proposed requirement that the projects must construct concurrently.	
ISH3.34	Blackpool Borough Council	Deadline 4	To confirm whether the proposed requirement concerning unexploded ordnance at Blackpool Airport remains a concern.	
ISH3.35	Applicants	Deadline 4 (for initial confirmation and Deadline 5 for any drafting updates required)	<p>Summarise the Applicants' responses to the proposed new requirements by various parties as noted by the ExA during ISH3:</p> <ul style="list-style-type: none"> - Construction water management plan - Air quality monitoring data and review of noise and vibration - Construction environmental management plan - [Unexploded ordnance at Blackpool airport- subject to confirmation from Blackpool Borough Council] - Hydrology at the sand dunes - Construction management plan 	<p>1. Construction water management plan (RR-1775.8 raised by Preston City Council) – for the Applicants' response see PDA-029</p> <p>The Applicants note that a suggested requirement for a construction water management plan was raised by Preston City Council in RR-1775.8. The Applicants responded to this in PDA-029. By way of summary, the Applicants submit that this is not required because there are sufficient controls in the existing draft DCO (REP3-009) as the existing management plans secured under the DCO provide sufficient security that flood risk will be appropriately managed and that the relevant authorities will have an appropriate level of control over the details of these plans. The Flood Risk Assessment (FRA) (F3.2.3/F04) has considered the potential for flood risk due to the construction of the onshore infrastructure associated with the Transmission Assets. The FRA (F3.2.3/F04) sets out mitigation measures to control flood risk during construction. There is also a commitment to preparation of detailed Surface and Groundwater Management Plan(s) as part of the Code of Construction Practice (commitment (CoT35 of Volume 1, Annex 5.3: Commitments Register (F1.5.3/F04)). These detailed plans will be developed in accordance with the outline Surface and Groundwater</p>

HAP No.	For whom	Deadline due	Hearing Action Point (HAP)	Applicants' response
				<p>Management Plan (APP-202) and will include information for managing surface water runoff during construction. The plan(s) must be approved by the relevant planning authority following consultation with Lancashire County Council, Natural England and the Environment Agency. This is secured through Requirement 8 within Schedules 2A & 2B of the draft DCO (REP3-009).</p> <p>2. Air quality monitoring data and review of noise and vibration (RR-1262.6 and RR-1262.7 raised by Lancashire County Council) – for the Applicants' response see PDA-012</p> <p>The Applicants note that a suggested requirement around air quality monitoring data and review of noise and vibration was raised by Lancashire County Council in RR-1262.6-7. The Applicants responded to this in PDA-012. By way of summary, the Applicants submit that monitoring is not required in light of the conclusions of the Environmental Statement (APP-121) which concludes that with appropriate mitigation measures, the air quality effects arising from dust are not expected to be significant. In addition, the results of modelling of traffic-related emissions show that the impacts are negligible. In any event, the Applicants submit that the relevant mitigation measures set out within the Outline Dust Management Plan (APP-195) and Outline Pollution Prevention Plan (APP-197), as secured by Requirement 8 of Schedule 2A and Schedule 2B (REP3-009), are sufficient.</p> <p>There is no need to add an additional requirement concerning construction traffic as construction traffic will be managed as set out in the Outline Construction Traffic Management Plan (APP-211). The detailed Construction Traffic Management Plan(s) are secured via Requirement 9 of the draft DCO (REP3-009).</p> <p>3. Construction Environmental Management Plan (10.94 raised by Lancashire County Council) – for the Applicants' response see REP2-039</p>

HAP No.	For whom	Deadline due	Hearing Action Point (HAP)	Applicants' response
				<p>The Applicants note that this was raised by Lancashire County Council in their Local Impact Report and the Applicants' responded to this is at Deadline 2 (REP2-039). The Applicants' position is that the information/measures requested are incorporated in section 1.5.2 (protection of retained hedgerows, woodland, mature broad-leaved trees and veteran trees), section 1.5.3 (protected and notable habitats, section 1.6.3 (habitat mitigation measures including buffer zones) and section 1.6.4 (protected and notable species) of the OEMP (APP-212). This is secured via Requirement 12 of Schedules 2A and 2B of the draft DCO (REP3-009), which requires the Applicants to provide detailed EMP(s) for the approval of the relevant planning authority, in consultation with Natural England (and the Environment Agency where works have the potential to impact wetland habitats).</p> <p>The Applicants therefore maintain there is sufficient protection under the existing DCO Requirements and no further amends are necessary.</p> <p>4. UXO at Blackpool Airport (8.2.10 raised by Blackpool Council) – Applicants' response see REP2-040</p> <p>The Applicants note this requirement is still under consideration by Blackpool Borough Council. The Applicants provided their response to this point in REP2-040, where they explained they have committed to implementation of detailed Code of Construction Practice(s) (CoCP) (commitment CoT35) secured through Requirement 8 of the draft DCO (REP3-009). The outline CoCP (REP3-018) explains the activities carried out in accordance with the definition of 'onshore site preparation works' (section 1.2.1.5). UXO are considered under 'surveys and investigations for the purpose of assessing ground conditions.</p>

HAP No.	For whom	Deadline due	Hearing Action Point (HAP)	Applicants' response
				<p>The Applicants recognise that given the historic use of the Airport land, it has potential for UXO that may present challenges for safe construction of the Transmission Assets. To ensure safe and appropriate construction, detailed ground investigations and UXO surveys will be undertaken post-consent to inform the final cable route design and construction methodology. These investigations will provide key information on ground conditions and UXO risk to ensure that the design and construction activities avoid or appropriately manage any associated risks.</p> <p>5. Hydrology at the sand dunes (10.1.1 raised by Fylde Borough Council) – for the Applicants' response see S_D4_2.3</p> <p>With regards to FBCs request for an assurance protocol to be secured through the DCO, the Applicants highlight that the OCOCP under Requirement 8 of Schedules 2A and 2B (REP3-009) already secures the surface water and groundwater management plan and hydrogeological risk assessment, which will be developed to manage flood risk.</p> <p>6. Construction management plan (1.1.5 raised by Blackpool Council) – for the Applicants' response see S_D4_2</p> <p>The Applicants note BBC's position which provided their preferred wording for a condition on construction working hours, which was raised specifically in the context of the Examining Authority's Question 1.1.5 around construction hours. As noted during the hearings w/c 28 July, the Applicants have updated the draft DCO (C1/F06) at Deadline 4 to remove Saturday afternoon working.</p>

HAP No.	For whom	Deadline due	Hearing Action Point (HAP)	Applicants' response
ISH3.36	Applicants	Deadline 5/ongoing	Carry out a consistency check across management plans where commitments are offered to highlight where the commitment is secured.	
ISH3.37	Applicants	Deadline 4	Update condition 11 in the DMLs to remove reference to 'substantially' and carry out a review of Schedules 14-17 for use of this term.	The Applicants have incorporated this amend into the draft Development Consent Order updated at Deadline 4 (C1/F06).

Table 1.3: Applicants responses to hearing action points from CA2

HAP No.	For whom	Deadline due	Hearing Action Point (HAP)	Applicants' response
CAH2.1	Applicants	Deadline 5	Ensure that the information provided to update the biodiversity benefit metrics considers the justification for compulsory acquisition of land in light of Section 122 of the Planning Act 2008.	The Applicants notes this action.
CAH2.2	Blackpool Borough Council/ Blackpool Airport	Deadline 4	Submit the joint statement between the applicants, Blackpool Borough Council and Blackpool Airport.	
CAH2.3	Applicants	Deadline 5	Confirmation of completion of the cooperation agreement and update on progress with the land agreement.	The Applicants notes this action.
CAH2.4	Blackpool Borough Council	Deadline 4	Submit comments as necessary regarding Starr Gate including comments regarding the cycle route.	
CAH2.5	Applicants and Blackpool Borough Council	Deadline 5	Engage on Starr Gate access and provide an update on these engagements.	The Applicants notes this action.
CAH2.6	Applicants and SABIC	Deadline 6	Submit statement of common ground clearly identifying any outstanding drafting on protective provisions if not agreed.	The Applicants notes this action.
CAH2.7	Applicants	Deadline 4	Confirm the applicants' approach to consideration of business impacts on agricultural holdings affected by permanent acquisition.	The Applicants intend to reach out again to agricultural holdings affected by permanent acquisition of land to obtain specific information necessary to develop bespoke mitigations and accommodations. When that information is received, the Applicants and their consultants will analyse it and then seek to work with the relevant agricultural holdings

HAP No.	For whom	Deadline due	Hearing Action Point (HAP)	Applicants' response
				to develop ways of working and support packages that can be deployed to ensure the continuation of agricultural holdings following any permanent acquisition of land or rights. A further update will be provided at Deadline 5.
CAH2.8	Applicants	Deadline 4	Confirm whether the minimum cable burial depth can be secured within the outline management documents	The applicants note current position in relation to decommissioning contained with the voluntary agreements that were practical to do so the cable will be removed if above 0.9 meters, The applicants are currently reviewing the outline management plans to determine the most appropriate document for this requirement, The applicant will provide the updated document for deadline 5
CAH2.9	Mrs Battersby	Deadline 4	Provide her submission in writing.	
CAH2.10	Applicants	At relevant deadlines	Update the Land Rights Tracker to include the major leasehold interests.	Lines have been added to cover off those long term agricultural tenants that made representations at the hearing.
CAH2.11	Applicants	Deadline 5	Update the SU Negotiations Tracker to include all SUs.	The Applicants have provided an updated SU Negotiations Tracker (S_D3_10/F02) for this action at Deadline 4.
CAH2.12	Applicants	Deadline 4	Provide a list of section 135 consents required and status of negotiations.	The Applicants have provided a Section 135 Progress Tracker (S_D4_21) for this action at Deadline 4.
CAH2.13	Applicants (Morecambe)	Deadline 4	Provide a summary of changes to Morecambe Offshore Wind Farm Limited ownership.	<p>On 26 February 2025 it was announced that Morecambe Offshore Wind Limited was being sold by Cobra IS, a COBRA Group company, and Flotation Energy, owned by TEPCO, to Copenhagen Infrastructure Partners' (CIP) fifth flagship fund, Copenhagen Infrastructure V (CI V).</p> <p>Effective of 17th July 2025, Morecambe Offshore Wind Limited is wholly owned by Copenhagen Infrastructure Partners' (CIP) fifth flagship fund, Copenhagen Infrastructure V (CI V). This change in ownership means that all contractual obligations and responsibilities associated with Morecambe Offshore Wind Limited—including those stipulated under the Crown Estate lease—will be assumed by CI V.</p>

HAP No.	For whom	Deadline due	Hearing Action Point (HAP)	Applicants' response
				Further information, including the updated corporate structure of Morecambe Offshore Wind Limited and the latest financial information, will be provided in the revised Funding Statement to be submitted at Deadline 4.
CAH2.14	Applicants	Deadline 5	Update the Equalities Impact Assessment to take into account any further effects identified and lighting at the Century Care Home and the Wrea Green Equitation Centre were referred to.	The Applicants notes this action.
CAH2.15	Applicants	Deadline 5	Update any relevant documents to reflect the Morecambe ownership structure change.	The Applicants notes this action.
CAH2.16	Applicants	Deadline 4	Provide a second blight note correcting positions in the response to action point CAH1.12 [REP1-037] as requested in Examining Authority's written questions 1 and repeated at CAH2.	The Applicants have provided a second blight note (S_D4_20) correcting positions in the response to action point CAH1.12 (REP1-037) as requested in Examining Authority's written questions 1 and repeated at CAH2 at Deadline 4.
CAH2.17	Applicants	Deadline 5	Allied to the corrected note is a reconsideration of whether the position as outlined in the updated funding statement is sufficient to satisfy this requirement.	The Applicants notes this action.