

**APPLICATION BY MORGAN OFFSHORE WIND LIMITED AND
MORECAMBE OFFSHORE WINDFARM LIMITED FOR A
DEVELOPMENT CONSENT ORDER FOR THE MORGAN AND
MORECAMBE OFFSHORE WIND FARMS TRANSMISSION ASSETS
DEADLINE 5 SUBMISSION BY LANCASHIRE COUNTY COUNCIL**

**LANCASHIRE COUNTY COUNCILS' RESPONSES TO THE
EXAMINING AUTHORITY'S COMMENTARY AND QUESTIONS ON
THE DRAFT DEVELOPMENT CONSENT ORDER ISSUED ON
MONDAY 8 SEPTEMBER 2025 & THE EXAMINING AUTHORITY'S
WRITTEN QUESTIONS AND REQUESTS FOR INFORMATION
(EXQ2) ISSUED ON 8 SEPTEMBER 2025**

22nd SEPTEMBER 2025

1. Introduction

- 1.1. This submission sets out Lancashire County Council's Deadline 5 submission for the Development Consent Order application for the Morecambe Offshore Windfarm Transmission Assets Generation Assets ('the Scheme'). It includes the County Councils' responses to the Examining Authority's Commentary and Questions on the Draft Development Consent Order issued on Monday 8 September 2025 and the Examining Authority's Written Questions and Requests for Information (Exq2) issued on 8 September 2025.
- 1.2. The responses only deal with the questions addressed to Lancashire County Council. Other questions addressed to the applicant and other parties are not included.

Morecambe and Morgan Transmission Assets DCO

1. General and cross-topic questions

1.1 General and cross-topic matters

Q2:1.1.1: Co-ordination and collaboration

The applicants response to ExQ1.1.7 [REP3-056] explains that whilst flexibility is required to allow each of the projects to construct independently of each other, opportunities may emerge for further coordination depending on each project achieving Financial Investment Decision and following detailed design. Notwithstanding the measures introduced such as Requirement 25 (Onshore collaboration) in the draft Development Consent Order (dDCO), what further specific drafting can be incorporated into the relevant control and management documents and the dDCO to ensure that full opportunities are taken for co-ordination and collaboration where such opportunities emerge, in the interests of reducing and minimising the potential effects of the proposed development upon communities and the environment?

Response : The County Council questions if this Article is still needed if the DCO applications for the Morgan Offshore Wind Project Generation Assets and the Morecambe Offshore Windfarm Generation Assets are decided by the time this Examination has concluded. The Secretary of State granted development consent for the Morgan Offshore Wind Project Generation Assets on 29th August 2025. As a minimum the County Council considers that Article 3(2) needs amending to take account of the latest position.

If the intention is to ensure that there is co-ordination between the projects in the event that both are approved then as currently worded Requirement 25 does not achieve this. As a minimum The County Considers that sub-paragraph (b) should amended to state:

(b) when submitting any plan or document referred to in sub-paragraph (a) for approval, submit any comments duly received from Morecambe/Morgan or a statement confirming that no such comments were received, and statement setting out how these have been taken into account, and where they have not, why this has been the case.

Q2:1.1.5: Outline Communications Plan

An updated Outline Communications Plan has been submitted by the applicants at deadline 4 (D4) [REP4-029].

- a) Do the local authorities and parish councils have any comments and/or additional suggestions on the drafting of this plan?**
- b) The updated version of the plan no longer includes reference to a 'local liaison committee, comprising relevant local representatives' that was included in paragraph 1.3.1.1 of the previous version of the plan. Can the applicants explain why this has been deleted?**

c) Do the local authorities and parish councils consider that the creation of a local liaison committee should be retained in the outline plan?

Response: The County Council is content for the details of the communications plan to be the subject of Requirement 8 which provides a basis for the details of local liaison to be further discussed and approved at a later date. Regarding a local liaison committee, the County Council considers that these might have a useful function particularly to engage with parish councils. However, as the scheme potentially affects so many interests, the membership and terms of reference of each liaison meeting would need to be carefully drawn up so that such meetings would not become unwieldy. Each liaison meeting would have to be held for a sufficiently restricted part of the route for similar reasons. Some parts of the route may also not necessitate such an approach for example where there is no parish council.

6. Ecology, biodiversity and nature conservation (on-shore)

6.1 Ecology and nature conservation

Q2:6.1.3: Sand lizards

outline Sand Lizard Mitigation Plan [REP4-117] has been submitted as D4.

- a) Can you comment on the appropriateness of the plan.**
- b) Please comment on the proposal and EPS licencing strategy outlined.**

Response: Lancashire County Council considers that insufficient time has been allowed to give this proper consideration. However, the County Council is not specifically required to respond to this question and is content to defer to Natural England as part of its consideration of the Letter of No Impediment.

Q2:6.1.7: Peat

CoT101 states that where high concentrations of peat are identified these, will be avoided where practicably possible for the placement of the plant and infrastructure to avoid the possibility of ground gas build up. Where this is not possible, further investigation and appropriate monitoring will be identified undertaken, if necessary. and the results will be used to inform detailed design of the permanent infrastructure as appropriate

Is this commitment adequate to ensure appropriate management and mitigation? If, not, can you propose alternative wording/ mechanism?

Response: The County Council considers that a view needs to be taken on the likely risks of ground gas build up. The wording of the CoT101 is quite flexible but it is considered that a stronger more definitive wording is only required if the risks justify such an approach.

Q2:6.1.8: Peat

NE state "We note the surveys undertaken in the outline Interim Trial Trenching Report [REP3-017]. This report identified that peat was present within the trial pits. In light of the confirmed peat occurrences, a detailed peat survey should

be carried out to establish peat depth, condition, and extent within the onshore order limits, ensuring that appropriate management and mitigation measures can be developed. These surveys are necessary to understand if any of the peat is restorable and to inform a Peat Management Plan (which we previously advised in our Relevant Representations, RR-1601).”

- a) Please comment on the above statement and provide an update.
- b) If resolution can't be reached before the end of the examination what mechanism would be appropriate to ensure no peat disturbance and appropriate management, and mitigation is ensured post consent.

Response: The County Council considers that this seems to be primarily an issue for Natural England. However, if further surveys are not possible before conclusion of the examination, the County Council considers that this issue could be the subject of an additional Requirement or amendment to the existing Construction Working Scheme to provide for a soils management strategy to demonstrate how any peat will be separately excavated and stockpiled, backfilled into the working corridor and restored to retain the existing hydrological conditions so that the peat is restorable.

6.2 Biodiversity net gain (BNG)

Q2:6.2.4: Biodiversity and bird strike risks

NPS EN-1 4.6.12 says that when delivering biodiversity net gain off-site, developments should do this in a manner that best contributes to the achievement of relevant wider strategic outcomes, for example by increasing habitat connectivity, enhancing other ecosystem service outcomes, or considering use of green infrastructure strategies. Reference should be made to relevant national or local plans and strategies, to inform off-site biodiversity net gain delivery. If published, the relevant strategy is the Local Nature Recovery Strategy (LNRS). If an LNRS has not been published, the relevant consenting body or planning authority may specify alternative plans, policies or strategies to use.

- a) If SoS was minded to agree with BAE Systems position, can the applicant comment on the quoted paragraph 4.6.12 of NPS EN-1?
- b) If SoS was minded to agree with BAE Systems position and on-site delivery of BNG was therefore not possible, could the councils and the applicants reach an agreement on alternatives that would align with the NPS EN-1?
- c) If SoS was minded to agree with BAE Systems position, will the applicants consider submitting a without prejudice strategy for off-site delivery of BNG to satisfy the NPS EN-1, section 4.6 with additional focus on 4.6.1?

Response: The County Council considers that the councils and the applicants could reach an agreement on alternatives that would align with the NPS EN-1. As per the response to the Examining Authority's First Written Questions:

Provision of mitigation, compensation and enhancement measures as close as possible to the point of impact is appropriate and is supported by recognised best

practice guidance (for example, CIEEM Guidelines for Ecological Impact Assessment). However, this doesn't preclude the possibility of off-site compensation measures. As long as the requirements of legislation, national policy and recognised best practice guidance are met, then departures from the applicant's own site selection guiding principles could be allowed, including mitigation outside of wildlife hazard management zones.

In cases where required habitat creation/enhancement cannot be achieved within the Order Limits, then habitat creation/enhancement elsewhere within the Local Planning Authority boundary, National Character Area or Marine Plan Area would be appropriate wherever possible.

Lancashire's emerging Local Nature Recovery Strategy (LNRS) is now available as a consultation draft. Final publication is expected in December 2025. The LNRS includes mapped opportunity areas where habitat creation and enhancement would provide the greatest benefits for Lancashire's biodiversity and habitat connectivity. This will affect the Strategic Significance score within the metric, which will also be relevant to the required extent of habitat creation/enhancement.

11. Historic environment

Q2:11.1.1: On-shore archaeological evaluation

At deadline 4 (D4) and further to discussion at issue specific hearing 3, the applicants submitted a summary of trial trenching approaches in other Development Consent Order applications [REP4-114] in addition to a timetable of trial trenching [Action Point ISH2.49 of REP4-108].

Taking account of these submissions and any further discussions that have taken place between the two parties, please provide a summary update on the positions of the two parties and any remaining disagreements regarding onshore archaeology. These should include whether LCC is satisfied that the remaining evaluation through trial trenching can take place post any development consent being granted.

Response: The Lancashire County Council Historic Environment Team (LCCHET) is of the opinion that the evaluation could be completed post any development consent being granted but this raises concerns in two respects. Firstly, it must be questioned whether the archaeological evaluation carried out to date has been sufficiently comprehensive to adequately characterise the heritage value of the site and therefore to allow a proper and robust assessment of archaeological value against the other environmental impacts and benefits of the proposal. Secondly, there is a risk that the evaluation and/or other archaeological works considered necessary may now continue into the construction phase, with a potential to then cause delay to the scheme.

There remains a concern that there has been a failure to move the project forward since August 2024 when 139 of 222 proposed trial trenches were excavated. For instance, why has there not been any attempt to excavate the remaining 83 trenches, for which there was permission to enter the land, in the period August 2024 to now, and to obtain C14 dates for those features that contained the necessary material. It

would be a normal expectation that a copy of the final report, or at the very least a draft version of it, including all relevant specialist reports would have been made available to LCCHET by now and it is considered to be a matter of some urgency that this is done prior to the next stage of evaluation works commencing next year.

LCCHET has been in receipt (11th August 2025) of further e-mail correspondence from Mr M Rawlings, the applicant's archaeological consultant, which contained an indicative summary of the process which gives a timeframe of 15 months to complete all evaluation/further investigation works prior to the commencement of construction. This would appear to be highly optimistic given the need for time to complete on-site works, for them to be fully reported (a process that can take as long, if not longer, than the time spent on site), and for the cycle to be repeated with any subsequent further on-site works that might be considered necessary, but which could be reported during the construction phase.

A large number of trial trenches remain to be excavated (the final total expected to be in the region of 300-350) but LCCHET has yet to see sight of the proposed layout. LCCHET is of the opinion that the amount of evaluation work that remains to be done and reported could take up the whole of 2026 and now means there is an increased risk of some of the on-site archaeological works, whether that be the evaluation or further archaeological works, now having to be completed in the construction phase which is scheduled to commence Q4 of 2026.

In an attempt to ensure that this is not the case it has therefore been agreed that:

- the results of the 2024 evaluation will be written up into a formal report complete with specialist reports;
- a site-wide trial trenching plan will be drawn up, both of which will be submitted to LCCHET in the next few months at the latest;
- given the tight timescale the proposed Q2-2026 evaluation works will prioritise works in those areas where the scheme is scheduled to start in Q4-2026 with a view to ensuring these areas are free of any archaeological interest before the end of Q3-2026;
- each phase of evaluation will need to be properly written up prior to the creation of any Site Specific Written Scheme of Investigation (SSWSI) for that area or areas; and
- consideration may be given to the use of a strip, map and sample methodology being used in place of trial trenching where time constraints may not allow for more than one phase of on-site works being undertaken as it would remove both a reporting stage and the need to submit a further SSWSI.

The prospect that Projects A & B might be built consecutively means that in all likelihood more than one archaeological contractor will be used. As a result of this the Onshore Archaeology WSI will need to be amended to ensure that upon completion of each Project, the works undertaken will, should it be considered necessary, be published in an academic publication (monograph) with the publication of the later scheme also containing an overarching synthesis of the two Projects.

Although the Outline Onshore Construction Method Statement (REP4-115) does not contain any specific reference to the need for archaeological works to be undertaken either prior to, or during, construction, section 1.2.1.1 refers to the Outline Onshore Construction Method Statement as merely being an Appendix to the Outline Code of Construction Practice (REP-027) and therefore bound by section 1.8.4.2, Historic Environment Management measures, of the Outline Code of Construction Practice (REP-027) where it states that "further programmes of archaeological and geoarchaeological investigation will lead to analysis, reporting of results and archiving of date."

It might however seem prudent, for the avoidance of any doubt, for some reference to the Historic Environment to be included in the Outline Onshore Construction Method Statement, given that section 1.2.2.1 states that "This Outline Onshore Construction Method Statement sets out the construction methodology and environmental considerations associated with the construction of the onshore elements of the Transmission Assets" even if it were just to include a reference back to the aforementioned section of the Outline Code of Construction Practice.

13. Landscape and visual

Q2:13.1.1: Engagement and statements of common ground

The ExA notes the schedule of meetings on landscape and visual matters, as well as green belt matters, set out in [REP4-110]. Subsequently, the ExA looks forward to the receipt of the applicants updated Outline Design Principles and relevant Statements of Common Ground (SoCG by deadline 5 (22 September 2025) as set out in the schedule. The SoCGs should include (as well as matters of agreement) any matters that remain in disagreement between the parties, along with explanation and justification for the positions taken. It should include matters concerning the Landscape and Visual Impact Assessment, outline Landscape Management Plan [REP4-054] and the applicants Green Belt Technical Note [REP4-092].

Response: Meetings have been arranged to discuss the Outline Design Principles (ODP) (which are currently a work in progress draft and incomplete) and general Landscape issues SoCG (also in draft). The first opportunity to assess all documents noted above was 16th September 2025. To provide the necessary feedback to the Applicants requires more time than the 22nd September deadline permits. The Draft Green Belt SoCG has not yet been viewed. Lancashire County Council's comments on the Green Belt Technical Note would be of value.

The face to face meeting with the Applicant's Landscape Expert Witness (15th September 2025), was productive in communicating and discussing issues, but time is required to assess how this information exchange is interpreted and translated into updated Landscape Proposals and documents. To date this has not been forthcoming, despite six months of communication with the Applicant.

LCC is not currently able to comment on the Draft SsoCG until after the 22nd September deadline and updated documents are discussed in more detail. The ODP was draft in format which again limits the scope for constructive comment, until further

detailed and issued. From that detailed to date however, the following points apply to the ODP;

- Of greatest concern is that the Applicant assumes in the document that the Landscape Strategy is complete and can therefore move to detailed design (Under Landscape Institute Work Stages assumes Stage E, whereas it is considered by LCC that Design Development is Stage C/D). The Landscape Strategy (Proposals) are not yet complete. There is genuine concern that if the current Landscape Strategy is accepted it is carried through to post consent and would not be amended further. Several 'Key Drivers' have not yet been taken on board. Despite 6 months of discussions and comments the Landscape Strategy has not been updated;
- It was noted the document referred mainly to Substations and it was agreed that it should apply to the whole development;
- The Applicant proposes a Design Champion. This differs from the Design Panel suggested by the Examiners (see Q2.13.1.5 below). The concerns itemised below would apply. The Applicants Design 'Partner' would not be independent.
- The 'Peoples' and 'Places' elements of The Strategic Design principles is considered very weak;
- The Applicant uses words such as 'may' or 'might', which offer no assurance that issues would be addressed;
- The Applicant uses misleading wording constantly to justify the case and does not present an honest annotation of landscape and visual effects. The mitigation planting is not 'woodland', it is a thin strip of native tree structure planting; and
- There are confusing conflicting references to built form and associated Substation design.

Detailed comments on the ODP are attached as Appendix A to this submission.

Q2:13.1.5: Design review process, consultation and engagement (a) and c))

a) What is the latest position of the parties regarding the possibility of an independent design review process for the proposed onshore substations?

Response: It is unknown if an Independent Review Panel (IRP) is proposed. There are several issues of concern that might arise from this:

- Who would fund the panel? Its independence could be compromised if funded by the Applicant. It is unlikely that LPA's would have the funding available;
- Who selects the Design Panel? This could influence the advice and outcome; Landscape often takes last place in construction projects - this large a project has a predominantly rural context and this should be reflected in the Panel selection;

- What is the timescale for this? It is recommended (Design Review Principles and Practice 2019) that an IRP should be set up early in the process, it is queried whether it is now too late.?
- Equally there should be sufficient time for the panel to assess the site and background information.

b) Can the applicants provide suggested dDCO drafting for this in the event that the Secretary of State considers it to be necessary?

c) Bearing in mind the National Infrastructure Commission Design Group's "Design principles guide for national infrastructure" (with specific reference to "people" and "places"), detail the measures that would be taken and secured to ensure that there would meaningful community and interest group engagement and involvement in the ongoing substation and substation landscaping design process? Is additional drafting needed to secure this?

Response: Public Consultations (in a few locations and not just for the Substations area) would be a means of communicating developing designs to stakeholders and the community, at agreed stages. The presentation of options as opposed to a finished design solution would be preferable to help develop design with opportunity for all sides to be heard and to discuss. Options should be sufficiently detailed and illustrated to enable the public to understand and be legible by using plain English and not jargon (e.g. materiality). It might be difficult to secure this through drafting but there are general guiding principles that should be adopted by the applicant in scheme development.

At the moment LCC , have not had opportunity to communicate their landscape requirements of Landscape Design Proposals with the general public/stakeholders. This might help allay concerns. The 'People' and 'Places' elements of The Design Principles Guide for National Infrastructure' could be split into the following;

People:

- Relocation of Bridleway/ PRow (to some degree) (adjacent to the Dow Brook), to ensure the public can continue to enjoy views and ambience/ tranquillity;
- The above relies on off site planting; existing boundary post and wire fencelines can become hedgerows with trees; and trees can be added to existing hedgerows. Both these enhance biodiversity as well as filter distant views, softening an otherwise harsh contrast;
- Off site planting to supplement boundary screening for businesses such as the Norcross Caravan Park;

- Off site planting within the sloped greenspace area (rough ground currently) to filter views from residents along Manor Drive;
- Ensure noise element has the maximum reduction;
- Ensure built design as noted above;

Places

There seems to be a reluctance to take on board off-site planting (possibly due to potential costs, land ownership issues, and timescales), however NPSs suggest that this might be necessary to achieve good design. In the case of both substations insufficient area exists in which to mitigate effectively in addition to existing limitations arising from the location of the cables. The applicant seems to be keen to maximise the planted/landscaped area within the site boundary and whilst this is sought, it is still some way from being sufficient.

Some elements which would be required to achieve this, in accordance with the areas landscape character include;

- Small woodland blocks built into the shape and layout of the field pattern, which help screen important viewpoints, but appear more natural than a line of planting which emphasises the built development;
- Enabling (in the case of substations) tree planting on extended depths of cables (enabled by the reduction of levels within the site area);
- Enabling greater extent of planting to areas allocated for attenuation ponds (NPSs again suggest these could be off-site); minor improvement generally;
- Ponds within field areas; (rather than unnaturally placed in a random group). It was noted that there are areas of existing fields which are low lying and therefore would be wetter areas generally. Ponds replaced in these locations would also aid field drainage. Ponds scattered throughout the landscape are part of the intrinsic landscape character and add to local ecology, providing stepping stones throughout the landscape;
- Built form options and development as noted above;
- Relocation of Bridleway/PRoW and off site planting as noted above;
- The cable corridors not having vegetation removed until required (i.e. depending on stages of construction) (i.e. Morgan before Morecambe etc.). This could reduce the 70-100m strip by circa 50%, enabling the remaining landscape to remain in place until required and enable restoration to circa 50% whilst the other route is constructed;
- Advanced planting could take place in those areas which would be unaffected by construction, but would have the advantage of earlier establishment, especially in off-site areas which contribute to reducing visual effects.

These options have been communicated to the applicant for several months now, but there has been a general lack of progress in developing proposals to take these into account. The Applicant appears to be focused on the proposed governance post consent and reluctant to change anything before this. LCC is concerned that there needs to be some assurance upfront that the Landscape

Proposals can be updated as required above, the drafting of Requirements to ensure the development of the Landscape Proposals to the LPA's/LCC's satisfaction. Also LCC's response to Q2.13.1.1. LCC would welcome Requirements which stipulate that Landscape Proposals/Strategy should be approved by the Examining Authority pre consent and that Detail Design should only then follow for approval by the LPA.

16. Transportation and traffic

Q2:16.1.2: dDCO, Requirement 10 Highway accesses

Should the Highway Access Management Plan (HAMP) be approved directly by the relevant highway authority in the same way as the Construction Traffic Management Plan (CTMP) (Requirement 9) rather than by “the relevant planning authority in consultation with the relevant highway authority” as stated in the latest version of the dDCO [REP4-007]?

Response: Yes. The County Council as the Local Highway Authority (LHA) considers that the Highway Access Management Plan (HAMP) should be approved by the relevant planning authority in consultation with the relevant highway authority.

Q2:16.1.5: Timing of Heavy Goods Vehicle (HGV) movements

Is LCC content:

- a) That the revised wording of the OCTMP paragraphs 1.4.3.1 to 1.4.3.4 of [REP4-056] provides adequate control over the timing of HGVs travelling to site and prevents parking/ queuing on the public highway?**

Response: Yes, however, this is assuming that HGV parking locations are suitable (those currently presented are not suitable and further explained under b) below).

- b) With the list of potential HGV parking locations in table 1.1 of [REP4-056]?**

Response: The LHA is currently not content with the HGV parking locations indicated in table 1.1 of [REP4-056]. The locations suggested are remote from any part of the development site and will have limited benefit, if any. The distances from the locations to the 3 access points of the proposed project are provided below.

Location	No. of Spaces Suggested	Distance (miles) to:		
		A6 (Blackpool Airport)	A01 (Proposed Substation)	A61 (Penwortham National Grid Substation)
M6 - Junction 31A	20	19.6	18.2	12
M6 – South of Junction 33	60 (30 north 30 south)	27.3	20.9	22.2
M65 – Junction 4	20	30.2	23.8	13.8
M61 – North of Junction 6	150 (100 north 50 south)	32.7	21.5	16.1
M6 – North of junction 27	70 (35 north 35 south)	30.3	17.1	10.4
M58 – Junction 5	30	41.3	28.1	21.1

List of potential HGV parking sites are not suitable as presented.

Q2:16.1.6: Links requiring HGV mitigation

Is LCC content that the applicants have identified all the proposed links that potentially require mitigation measures for the safe passage of HGVs in section 1.10 of the OCTMP [REP4-056]? If not, which links have been omitted?

Response: The LHA is currently not content that the applicants have identified all the proposed links that potentially require mitigation measures for the safe passage of HGVs in section 1.10 of the OCTMP [REP4-056]. The OCTMP essentially splits the links in two categories (constrained in terms of carriageway width and on-street parking).

There are some links that the LHA identified as constrained in terms of both carriageway width and on-street parking.

With this, Link 102 should be included on the constrained carriageway list, (currently only listed on the on-street parking list).

Link 101 should be included in the on-street parking list (currently only under the constrained carriageway list).

A further review has identified on-street parking on parts of the initial section of Link 43a which should also be considered.

Link 72 has been included under the on-street parking list. The LHA have suggested consideration is given to cyclists, on the section of this link that does not form part of highway maintainable at public expense, but rather a private route with a cycle lane that the applicant proposes to use for access.

Q2:16.1.8: HGV Mitigation Measures

Is LCC content that the issues on all links can be addressed in principle by the measures proposed by the applicants in paragraphs 1.10.2.1 and 1.10.2.2 and section 1.11 of the OCTMP [REP4-056]? If not, what further measures are required?

Response: The LHA does not consider that the issues on all links can be addressed in principle by the measures proposed by the applicants in paragraphs 1.10.2.1 and 1.10.2.2 and section 1.11 of the OCTMP [REP4-056].

The principles of the extents of works required have not yet been indicated, and as highlighted by the LHA in ISH2, this is typically done through the provision of swept path analysis. The LHA is still awaiting this information. An ordnance survey plan supplemented with the observations (every 50m) already collected by the applicant could be used to validate and update inaccuracies within the OS data.

Without an adequate level of indication as to the extent of the issue, the principle of mitigation cannot be determined, notwithstanding its suitability (design standards and safety) or deliverability (in engineering terms within highway boundary / land controlled by the applicant).

Note: Paragraph 1.10.2.4 of the OCTMP states "Where road / junction widening, new/improved passing places or signage is proposed, they would be contained within the public highway". There are a number of links that will require mitigation beyond public highway to safely satisfy development needs, based upon their principles and proposed routing.

Whilst the OCTMP proposes some generic mitigation measures, however, to support the principles (generic mitigation) requires a refinement of the Traffic Management measures/mitigation that has regard to each location/pinch point/corridor.

The LHA is happy to consider mitigation proposals, but the principles of the mitigation measures must be demonstrated to be deliverable and operational for each specific highway link, as each link has its own unique constraints.

On 28th August 2025, the applicant provided via email, the "Last Leg – Highway Mitigation Note" draft for submission at Deadline 5. The LHA have provided a detailed response to the applicant on 16th September 2025 highlighting concerns with that currently presented and the lack of evidence to support the mitigation principles.

Q2:16.1.9: HGV Mitigation Measures

Is LCC satisfied with the proposed process for agreeing, implementing and monitoring measures to address issues on the links set out in table 3-1 of [REP4-113] and paragraphs 1.10.2.3 to 1.10.2.8 of the OCTMP [REP4-056]?

Response: The LHA is not satisfied with the following elements of Table 3-1 of [REP4-113] at this stage:

Stage 1 d) - Highway envelope has not been fully considered. Where highway envelope measurements are provided, they appear to include existing footway. Whilst

this is not an issue for areas of oversailing, they cannot be included in areas considered for widenings or passing places as the removal / reduction of sustainable infrastructure will NOT be supported. Where the highway envelope for oversailing of vehicles is considered, regard has not been had to high foliage / dense shrubs (which also affects forward visibility and positioning of vehicles) will impact the extent of highway that can be "over sailed". No regard has also been had to the horizontal alignment of the road, i.e., swept paths, which increases the required width of carriageway.

Stage 2 – The document "Last Leg – Highway Mitigation Note" has been provided to LCC Highways on 28th August 2025. Detailed comments and concerns with the document were sent back to the applicant on 16th September 2025. LCC Highways do not agree with the carriageway and highway envelope widths presented by the applicant to be suitable for 2-way HGV movements.

Elements of Table 3-1 of [REP4-113] currently outstanding:

- Stage 3 - Workshop with LCC Highways which is scheduled for 18th September 2025.
- Stage 4 – As of 17th September 2025, the LHA are currently awaiting an updated SoCG.

With regards to Paragraphs 1.10.2.3 to 1.10.2.8 of the OCTMP [REP4-056], the proposed process for agreeing and implementing highway works under Section 278 of the Highways Act 1980 is supported. However, no reference is made to monitoring measures within these paragraphs.

Q2:16.1.10: HGV Mitigation Measures

Confirm that all the proposed mitigation measures (including the provision of localised passing places and the widening of pinch points) can be accommodated within the order limits or highway land.

Response: This covered within the response to Q2:16.1.8 above. Sufficient information regarding the required mitigation has not been presented to date, therefore, the accommodation of any such mitigation within the order limits or highway land cannot be confirmed at this stage. There are significant concerns that these measures cannot be delivered to a level that mitigates the development's impacts on these corridors, within highway land.

Q2:16.1.11: Crossing points

The applicants provided data on daily heavy vehicle movements to construction accesses including crossing points in table 2-1 of [REP4-113]. Given this data, is LCC content with the crossing points proposed?

Response: The LHA does not have concerns with the proposed HGVs numbers at crossing points, for the maximum design scenario, as presented. It is important that these HGV levels (averages and maximum) are not exceeded, as these have been derived from the maximum design scenario, and HGV movements are monitored. The monitoring process has not yet been agreed in principle. Whilst the monitoring of HGV

movements at accesses is not unreasonable, at this stage, insufficient information has been presented on how monitoring will be undertaken on individual links, to ensure HGVs comply with the presented routing strategy, with their suitability having regard to their constraints (with mitigation yet to be concluded).

Q2:16.1.12: Final form of agreement for highway works

Confirm your understanding of the powers under which works to the highway will be undertaken (including mitigation measures for the safe passage of HGVs, the construction of accesses and any works associated with the movement of Abnormal Indivisible Loads).

Response: Section 278 of the Highways Act 1980 will be used for works to the highway (mitigation, accesses, abnormal load works, remediation and maintenance). This will be undertaken under a complicated bespoke Section 278 agreement. It may be the case at detailed design stage that the LHA may choose to use Section 59 of the Highway Act 1980 for highway maintenance. It is important that all routes used are maintained at the highest levels to limit the possibility of road closures impacting upon existing users as well as the proposed project, thus highlighting the importance of highway monitoring funded by this development, as previously discussed in ISH2.

Q2:16.1.13: Preston Guild Wheel Cycle Route

Is LCC content with the proposed usage of the A583 overbridge on the Preston Guild Wheel Cycle Route set out in paragraph 1.12.5.1 of the OCTMP [REP4-056] (i.e. approximately 12 movements a day six in and six out) and the associated safety measures proposed set out in paragraphs 1.12.5.2 to 1.12.5.5?

Response: As highlighted at the Issue Specific Hearings, the LHA is not content with the proposed usage of the A583 overbridge on the Preston Guild Wheel Cycle Route set out in paragraph 1.12.5.1 of the OCTMP [REP4-056] (i.e. approximately 12 movements a day six in and six out) and the associated safety measures proposed set out in paragraphs 1.12.5.2 to 1.12.5.5. Further information provided to the LHA via email, indicates that in addition to the average cyclist movements observed during the survey, a peloton of 63 cyclists was identified on one weekday at 14:30, (this is not included in the calculation of average movements).

Notwithstanding the principle of this popular and well-used route for cycling, walking and dog-walking being used for HGVs, sufficient information has not been provided on where any users (individual or groups) will be suitably and safely held and for how long.

Q2:16.1.16: Preliminary access design

Is LCC content with the preliminary access design information contained in table 1.1 of the Outline Highway Access Management Plan (OHAMP) [REP4-060]?

Response: The LHA is not content with the preliminary access design information contained in table 1.1 of the Outline Highway Access Management Plan (OHAMP) [REP4-060]. The following accesses are yet to be resolved:

- A33 (very theoretical swept paths provided, hedgerow to be removed is not shown, supporting link is not wide enough for movements);
- A44 to A47 (30mph speed limit proposed, insufficient detail on enforcement, visibility splays required to be increased);
- A53 (visibility splay required to be increased);
- A57 (LHA concerns highlighted within answer to Q2:16.1.13);
- A58 (unclear how cyclists will be managed at the access); and
- A59 (visibility to the west required, supporting link not suitable for 2-way HGV movements).

The LHA have been unable to locate any proposals to overcome the concerns previously raised with these accesses.

In addition, access A9 is included within Table 1.1 of [REP4-060] but no longer shown on the preliminary access plans below the table. The LHA were previously asked to consider proposals for access A9b to be included as part of a change request. This access is not included within Table 1.1 or shown in the plans. Further clarity is required on these accesses.

Q2:16.1.17: Treatment of accesses no longer required

Is LCC content with proposals to address accesses that are no longer required for the construction of one of the proposed projects set out in paragraph 1.4.3.4 of the OHAMP [REP4-060]?

Response: The LHA is content with proposals to address accesses that are no longer required for the construction of one of the proposed projects set out in paragraph 1.4.3.4 of the OHAMP [REP4-060]. However, this should be agreed with the local planning authority, in consultation with the local highway authority, rather than as currently worded.

ExA's DCO questions and commentary: 8 September 2025

1. Articles

Q1:1.3: Article 7 – Application and modification of legislative provisions

Can the parties provide an update on the progress of negotiations on the matters within Article 7? Where any agreement has not been reached, please provide an agreed timetable for resolution prior to the end of the examination.

Response: The County Council have had further discussions on this matter in relation to the Land Drainage Act provisions with Article 7. A further draft of the Protective Provisions has been discussed between the County Council and the applicant and it is expected that the remaining outstanding issues will be resolved before deadline 6.

Q1:1.5: Article 10 – Power to alter layout etc. of streets

At issue specific hearing 3 (ISH3) the applicants explained [REP4-106] they are in ongoing discussion with LCC regarding how a section 278 agreement could also apply to these works.

- a) **Provide an update on these discussions and relevant to this article.**

Response: Simple initial discussions have been had with the layouts to support a Section 278 agreement. No further discussion on the agreement, the type of agreement or its content has been had. Requirements of the complex agreement are highlighted within the LCC response to Q2:16.1.12.

- b) **Given the apparent uncertainty regarding the need for the power to apply generally to land outside of the order limits, and bearing in mind that the article could also possibly apply to streets beyond the remit of LCC as the highway authority, why can any necessary approvals for such works outside of the order limits not be subject to the usual controls and approvals that are routinely sought from the relevant highway authority?**

Response: A similar agreement can be made with neighbouring highway authorities. Any land requirements beyond that which is maintainable at public expense can only be progressed by the developer's agreement with those land owners, where land is required for agreed further changes. Any land that is required as part of mitigation works for this development, that would also be available for public use (e.g. widenings) would be required to be dedicated to the LHA.

Note i: LCC would not own the subsoil to that land.

Note ii: Access points would remain in the ownership of land owners.

3. Schedules 2A and 2B: Requirements

Q1:3.1:Requirement 1 – Time limits

- a) **The Examining Authority (ExA) notes the decision of the SoS to allow a 7-year commencement period in the Morgan Offshore Wind Project Generation Assets Order 2025 (“Morgan”). However, that project is entirely offshore and does not lead to and has not considered the potential onshore effects on local communities that could arise from the proposed development in this case (the transmission assets). Therefore, notwithstanding the Morgan decision, would a reduced commencement period of 5 years be justifiable for the transmission assets development taking into consideration the implications this may have including for landowners and local communities?**

Response: Yes, the County Council considers that five years would be justifiable, given the impacts of the project.

- b) **In the event that the SoS considers that the maximum time period between projects should be reduced by two years or more, what drafting implications would this have for the Development Consent Order (DCO) and any other certified documents?**

c) Response: the timescale for the discharge of other individual Requirements may need to be amended to reflect the shorter commencement date.

d) **The SoS, in granting the Morgan DCO removed the provision for an additional year to deal with any judicial review as he considered that any delay caused by a judicial review will not have a significant impact set against the 7-year overall period. Notwithstanding the matters raised above, the ExA suggests that Requirement 1(2) is similarly deleted.**

Response: Yes, the County Council agrees; five years is still significantly greater than the implementation period for TCPA 1990 decisions

Q1:3.7: Requirement 6 – Provision of landscaping

Should 6(2) of this requirement also include details of existing trees and hedgerows to be retained and those to be removed, given that such details are likely to be factors in the consideration of the acceptability of a proposed landscaping scheme?

Response: Yes, the County Council supports this. In terms of vegetation retention there should also be some control regarding how retained vegetation will be protected from damage during works

Q1:3.8: Requirement 7 – Implementation and establishment of landscaping

Are the Councils satisfied with the approach taken by the applicants in distinguishing between the ‘establishment’ of landscaping through Requirement 7 and the further maintenance of landscaping which the applicants explain would be secured through the outline Ecological Management Plan [REP4-059]? If not, please suggest how this might be resolved?

Response: There needs to be some consistency regarding the maintenance period or at least some clarity that any longer maintenance period through the Ecological Management Plan does not relate to tree and hedge planting undertaken under Requirement 7.

Q1:3.9: Requirement 10 – Highway accesses

As discussed at ISH3, this requirement has been amended in the draft DCO [REP4-008] at deadline 4 (D4). Is LCC content with the revised wording? If not, what potential drafting changes are suggested?

Response: The LHA is content with the revised wording for the implementation of the accesses. However, requirement 10 as currently presented does not consider the maintenance or removal / reinstatement of the accesses and that to support the access (e.g. hedges, walls, signals, signs and kerbing etc).

Q1:3.10: Requirement 11 – Onshore archaeology

The applicants have made further amendments to this requirement at D4 [REP4-008]. Is LCC content with the revised wording? If not, what potential drafting changes are suggested?

Response: If the phrase "no stage of the ...onshore works...or intertidal works" can be taken to mean to apply to any aspect of Projects A & B that require ground disturbance, then the proposed wording change is still considered to give the County Council sufficient control over the nature and timing of any archaeological works to be undertaken and would therefore be acceptable.

Q1:3.11: Requirement 12 – Ecological management plan

The applicants have made further amendments to this requirement at D4 [REP4-008].

- a) Are BAE Systems, Blackpool Airport Operations Ltd and the Councils content with the revised wording? If not, what potential drafting changes are suggested?**

Response: The County Council has no comments on the revised wording.

- b) What is the latest position between LCC and the applicants on the points raised by LCC in paragraph 3.19 of [REP4-136]?**

Response: The County Council has not been consulted further by the applicants on this matter.

Q1:3.12: Requirement 14 – Construction hours

- a) 14(2) refers to works that may take place outside of the hours specified in sub-paragraph (1) for certain identified works. Should the last word of this opening sentence therefore say “comprising” rather than “including” as the later indicates that it is not a closed list?**

Response: The County Council agrees.

- b) Referring to the definition of “mobilisation activities” in 14(6) can the applicants explain what is meant by “general preparation and site maintenance work”? Why does this need to be included as part of the mobilisation activities bearing in mind that, whilst it would not include the operation of heavy machinery or generators, it might still possibly lead to issues of noise and disturbance when occurring in proximity to residential receptors between 6.00am and 7.00am?**
- c) For clarity, the ExA suggests adding similar wording from paragraph 1.6.1.6 of the outline Noise Management Plan [REP4-032] to this requirement.**
- d) Can the applicants explain what is meant by “classes” in 6(b)?**
- e) Whilst noting the amendment already made to Saturday working hours, would it be reasonable to push forward the start time of construction works on Saturdays from 0700 to 0800, given that there may generally be an expectation for less disturbance on Saturday mornings in comparison to weekday mornings?**

Response: The County Council agrees that it would be reasonable to push forward the start time of construction works on Saturdays from 0700 to 0800 where works are proposed with 200m of noise sensitive properties.

- f) Do the local authorities have any outstanding comments on this requirement, including any suggested alternative drafting should any concerns remain?**

Q1:3.13: Requirement 14 – Construction hours (a) only)

LCC makes a suggestion (paragraph 3.22 of REP4-136) for later construction start times of 0800 in locations within 200 metres of a residential property.

- a) Can LCC explain further its justification for this suggestion with examples of what forms of noise and disturbance it considers would be unacceptable before 0800, taking account of any relevant noise mitigation proposed by the applicants?**

Response: Noise impacts from use of excavators or other mechanical construction plant.

- b) Can the applicants comment on this suggestion?**

Q1:3.14: Requirement 16 – Restoration of land used temporarily for construction

The applicants have made further amendments to this requirement at D4 [REP4-008].

- a) Is FBC and LCC content with the revised wording? If not, what potential drafting changes are suggested?**
b) What further measures and drafting be provided to resolve the concerns of FBC and Lancashire County Council in paragraphs 3.2 and 3.3 of [REP-136]

Response: Wording appears acceptable - 16(1) should be approved in writing – not agreed

Q1:3.17: Requirement 20 – Operational drainage management plan

- a) This requirement needs amendment to only refer to the lead local flood authority as discussed at ISH3 [REP4-106].**
b) Notwithstanding the above, do LCC and FBC have any remaining concerns about the responsibility for approval of this plan?

Response: The LLFA recommends that the DCO is amended to reflect that the responsibility for the approval of the detailed Operational Drainage Management Plan is to sit with the relevant local planning authority, in consultation with the lead local flood authority, highway authority and Environment Agency.

This is to reflect the roles that those authorities have for various aspects of drainage and flood risks, and that the LLFA, Highway Authority and the Environment Agency currently have no legal means to 'approve' drainage strategies and other matters (like

flood risk assessments). Only the Local Planning Authority has the legal means to 'approve' these documents and plans associated with a planning application or the Requirements of a Development Consent Order, where approval the details is identified as being for their approval.

Given the proposals for local government reorganisation, the relevant local planning authority, lead local flood authority and highway authority may change in the future so it is recommend that the wording of the DCO is worded in such a way that is future proofed.

The LLFA has communicated this to the applicants and proposed an amended wording for Requirement 20(1) so that it states:

“(1) Work No. 21A must not commence until, for that work, an operational drainage management plan (in accordance with the outline operational drainage management plan) has been submitted to and approved by the relevant local planning authority in consultation with the lead local flood authority, the highway authority, and the Environment Agency. The operational drainage management plan must be substantially in accordance with the principles set out in the outline operational drainage management plan”.

Q1:3.19: Requirement 25 – Onshore collaboration

- a) In the event of overlapping construction work programmes between the two projects (which is understood to be a possible scenario), do definitions of “sequential” and “concurrent” construction need to be provided or alternative wording to cover an overlapping scenario?**
- b) What progress has been made between the applicants and FBC regarding the Council’s concerns about collaboration at D4 [section 2.1 of REP4-134]?**
- c) Do the local authorities have any outstanding comments on the drafting of this requirement, including any suggested alternative drafting should concerns remain?**

Response: It is not clear exactly what Requirement 25 is trying to achieve and how it would be implemented/enforced. The main issue appears to be making sure there is a defined responsibility for restoration responsibilities in any scenario and in terms of a sequential approach, how restoration would be phased and the allowable limits of restoration deferment between the first project ending and the second project commencing. How much time should be allowed after the completion of the first project before all restoration must be implemented? It is considered that there should be a review at the time the first project commences as to the likely programming of the second project and at that point a scheme should be submitted for the phasing and restoration of the overall scheme.

Q1:3.20: Requirement 26 – Biodiversity benefit (a) only

The applicants explain in the Explanatory Memorandum [REP4-009] that this newly drafted requirement is being offered on a without prejudice basis subject

to compulsory acquisition powers being granted for the biodiversity benefit areas.

- a) Are the local authorities and parish councils' content with the revised wording? If not, what potential drafting changes are suggested?**
- b) Can the applicants explain how the biodiversity benefits would be implemented for the proposed development and how this would be enforced?**

Response: In relation to Requirement 26, REP4-009 (Paragraph 1.7.2.24) states that "It provides that, unless otherwise agreed with the relevant planning authority, written evidence (in the form of the outputs of the biodiversity metric) demonstrating how biodiversity benefit in accordance with the onshore biodiversity benefit statement is to be delivered as part of Project A must be submitted to the relevant planning authority no later than the date on which Project A is first brought into operation".

The County Council suggests that the written evidence must be submitted and approved by the LPA by the stated date.

Q1:3.21: Suggested additional requirements

In response to ISH3.35 of the hearing action points [REP4-108], the applicants set out their response to several additional requirements that have been suggested by the local authorities.

Are the Councils satisfied with the responses provided to each of these suggested requirements? If not please provide justification for your position and suggested drafting of any additional requirement that you still consider to be necessary?

Response: Provided the issues raised in the County Council's LIR are addressed in the relevant management plans to be submitted in accordance with Requirement Nos. 6, 8, 9, 10, 12 and 20, this should be sufficient without needing any further requirements.

Q1:5.3: Comments on drafting

Do any of the Councils have any remaining outstanding concerns regarding the content of Schedule 12?

Response: The County Council is concerned that paragraph 3 of Schedule 12 provides for a ten week period for determination of applications of the discharge of Requirements. This may not be sufficient in relation to some requirements, particularly where consultation with external consultees is required. The County Council does note that the paragraph 3(b) does make provision for the agreement of "such other period as may be specified in a requirement or otherwise agreed by the undertaker and the relevant planning authority", which is welcome.

Appendix A - Landscape Comments on the Outline Design Principles (Shared in Draft) 05 September 2025

Ref: Planning Inspectorate No: EN020032

**PROPOSAL: MORGAN AND MORECAMBE OFFSHORE WIND FARMS
TRANSMISSION ASSETS NATIONALLY SIGNIFICANT
INFRASTRUCTURE PROJECT**

**DEADLINE 5 - RESPONSE TO EXAMINER'S 2ND QUESTIONS;
by LCC Landscape Architect**

Outline Design Principles (Shared in Draft) 05 September 2025

Landscape Comments

Date: 16.09.25

1.0 Introduction

1.1 This document J3 Outline Design Principles (as above) WIP overlaps with the recent Applicant document '*Proposed updates to the outline Design Principles document for Deadline 5*'. Document Reference: SoCG August 2025 F01. Comments on this were documented 03 September 2025 (also attached). It is unclear what, when and if all documents and comments have been submitted and viewed by the Applicant?

1.2 The References refer to the WIP document.

2.0 Landscape Comments

2.1 Ref 1.4.1.1: The document seems to concentrate on the Substation Design rather than the whole length of the development. The Substations are one part of the overall scheme. The whole development should be referenced.

2.2 Ref 1.3.1.1: Note with regards to what has been achieved- states '*has been integrated...into post consent detailed design*'. This is not yet the case and therefore change use of tense to conditional.

2.3 Ref 1.3.1.12: there is concern that the key design parameters and Commitments will not be sufficiently detailed and agreed prior to any consent. If they are not agreed and are incomplete as far as LCC Landscape is concerned, then whatever is proposed post consent is also weakened and would not achieve landscape proposals which fulfil the 'Design principles Guide for national infrastructure' (People and Places).

2.4 Ref 2.1.1.1 and 2.2 generally: A reiteration of 2.1 above.

2.5 Ref 2.2.2.1: Regarding the Morecambe Substation it is noted that the Bridleway is north of the site and a PRoW to the east (and other PRoW to the south).

2.6 Ref 2.2.2.1: Regarding Morecambe there is no reference to the ridgeline and the level difference particularly to the south which is very flat and presents open views of the Proposed Substation site.

2.7 Ref 2.2.3.3-4: Surely if a soil medium has low permeability it would therefore contribute to surface water flow? The paragraph acknowledges the presence of many small ponds. These are part of the landscape character and have ecological benefit, as well as having the ability to help drain field areas. They should be reinstated wherever lost the length of the cable corridor and to field areas for Substation sites.

- 2.8 Ref 2.2.5.6: The setting to the asset is also considered paramount in terms of any historic element.
- 2.9 Ref 2.2.6.2: Over emphasis on urban, the area is predominantly rural and agricultural and query where the marginal upland areas are within the site area?
- 2.10 Ref 3.1/3.2: As 2.1 above- not just the Substation areas, but the whole length of the proposed development.
- 2.11 Ref 2.2.6.5: The Landscape Character Strategy for Lancashire (2000) is somewhat out of date and it would be desirable to update the document. The Landscape Institute recognises this is the situation with many LPA's & CC's and recommends that Developers should carry out supplementary Landscape Character Assessments. This has happened on LCC Proposed Highway schemes. No update has been provided here. Both Landscape Architects involved for the Councils have either detailed experience of Landscape Character Assessment and/ or significant knowledge of Fylde Landscapes and therefore have hoped to guide any proposals accordingly.
- 2.12 Ref 2.2.6 refers to generalities and does not describe landscape character specific to the site. (other than 2.2.6.2) It is easy to recognise some of the characteristics noted in the NCA, such as the frequent ponds, hedgerows, small woodland blocks, agriculture-pastural and arable, field pattern etc. and perhaps more could be noted on this, as these are the characteristics to aim to be retained.
- 2.13 Ref 2.2.7: More could be noted re: PRoW (cross reference?) and Bridleway. Need to be specific re: Substation sites? Very general.
- 2.14 Ref 2.2.7.3: nothing yet noted on Green Belt and whole of Design Implications sections not yet noted.
- 2.15 Ref 4.5: Needs to apply to the whole length of the development, not just the Substation sites.
- 2.16 The 'Peoples' aspect of the Strategic Design Principles is very weak, it demonstrates little to that has been proposed to allay the concerns that the public has and that LCC Landscape have tried to address in Landscape Proposals on and off site.
- 2.17 The 'Places' aspect of the Strategic Design Principles is also very weak. It offers very little assurance of how and where the landscape character is being integrated and mitigated.
- 2.18 Ref 4.6: This speaks in the future tense as to what is beginning to happen, not what has fully happened now. There is real and genuine concern that the Landscape Proposals do not reflect sufficient updates and do not achieve mitigation as suggested and recommended and that if the Landscape Proposals Drawings as they stand become part of the Design Code that these get carried through to Post Consent.
- 2.19 Ref 4.6.3.5: 'may be' offers no degree of certainty or assurances. LCC noted at meeting of 15.09.25 that document offers conflicting information. On one hand stating that material to be steel with cladding, another stating the design partner would look at options. Confusing and doesn't offer assurance that would achieve a mutually agreed outcome.

Project Level Design Principles:

People

- 2.20 There will be cumulative effects no matter what efforts are in place, resulting from the location of two substations in such close proximity. Efforts in mitigation should aim to minimise the cumulative effects by utilising recommendations as put forward by LCC & FBC Landscape Architects.
- 2.21 PE2: Delivery: This should also include off site planting to mitigate, filter and reduce effects for residents, PROW users and Business users.
- 2.22 PE3: Do not have confidence that 'Big' decisions/ Key drivers would be agreed post consent.

Places

- 2.23 PL1: Needs to include ponds, they are an intrinsic part of the landscape character.
- 2.24 PL3.1: Needs to include off site planting- strengthens character- boundaries and reduces effects of urban built form/ scale in rural area; Fencing as it stands would not contribute to screening, it adds to urban and alien elements in the rural area.
- 2.25 PL3.2: The level changes inside the site do not necessarily need to be gentle etc. if they are internal and not seen. There is an opportunity to retain earth internally to enable greater level changes and therefore greater screening. There would be opportunities to use fill elsewhere in the local area to control views, control levels near watercourses.
- 2.26 PL1-5.3: these need to be agreed specifically with consenting Authorities (Delivery). Not just 'discussions'.

Value

- 2.27 Ref 4.6.3.6: Disagree that The Landscape Strategy (Proposals) to date reflects discussions with consenting Authorities. They do not demonstrate any 'evolvment' as have not changed in 6 months.
- 2.28 Ref 5.1.1.12: This demonstrates that there have been no further changes to either Substation sites within a 6 month period, despite the numerous discussions, suggestions and recommendations from consenting authorities.
- 2.29 Ref 5.2 generally: Disagree based on LCC Landscape comments to Green Belt Technical Note.
- 2.30 Ref 5.3.1.2-4: Disagreed. The site layout maybe well designed, but its integration is not. The examples illustrated documented images with different scales of landscape and different patterns, therefore this is not considered an honest statement and portrays the Applicants objective only.
- 2.31 Ref 5.3.3.6: Once developed the Green Belt area of the Substations would become Grey Belt and be open to further development. It would not be reinstated to its original condition as agricultural land use unless stipulated within requirements on decommissioning?
- 2.32 Indicative Substation layout doesn't present an actual layout per specific site area. Applicant explained this is being developed, possibly post consent? It is unknown. Greater clarity required.

- 2.33 Ref 4.3.4.6: needs also to include maximum noise abatement for PRoW & Bridleway.
- 2.34 Ref 5.3.5.4: use of 'May be' offers no assurance that this would happen.
- 2.35 Topographic information needs to be such as to be legible. It isn't at present. The information provided for cross -sections has not been updated (as from viewing 15.09.25), following comments by the Examiner at Hearing 2 and previous LCC Landscape comments. The Applicant acknowledged this, but it wasn't clear whether updates were to be proposed.
- 2.36 Ref 5.3.9.1: Contradictions make for confusion. At one point it is stated that a design partner would utilise vernacular materials which integrate with the landscape. This totally contradicts and states Substations etc. materials would be selected by function (and in reality probably cost). These would be unlikely to be integrated within the landscape and its rural characteristics.
- 2.37 Ref 5.3.11: Palisade fencing is inappropriate in the rural area. It is cheap and urban in appearance. Efforts to fully screen or utilise other fence type options should be explored.
- 2.38 Ref 5.3.13: Disagreement over widths of permanent accesses and justification for such widths not yet provided.
- 2.39 Ref 5.3.14: Mitigation Planting?
- 2.40 Ref 5.3.14.3 Arable???
- 2.41 Ref 5.3.14.5 Realistically it is not woodland but Native Tree Structure Planting. Woodland is misleading, suggesting something much larger than it actually is. Define 'sympathetically'.
- There are limitations of this, be honest with descriptions. To the west of the Morgan Substation little space exists, to the east the levels fall , therefore reducing capacity to screen, cables enter/ exit the Substation areas preventing tree planting.
- 2.42 Ref 5.3.14.10: Permeable/ impermeable...confusing description.
- 2.43 Ref 5.3.14.11-12: Doesn't say how, when, why, almost pointless, words no substance. Figures 12 and 13 need to be updated and would not be accepted in their current state.
- 2.44 Might be useful to include the Commitments as an Appendix for ease of reference.
- 2.45 Unless the 'Design Champion' is independent there is little faith that design would fulfil considerations from planning authorities or stakeholders. See also comments to ExQ2.
- 2.46 Ref 6.2.1: This section assumes that Concept / Design Layout is approved, it isn't. The Landscape Proposals Plans should be approved prior to Detail Design. (Jumping to Stage E LI (Landscape Institute) Stages when only at Stage C/D).The Design stage is not yet up to Detail Design.
- 2.47 Ref 6.2.1.7: To this should be added ; Built form, Layout of Built form, Landscape Proposals , inclusive of hard and soft materials, proposed levels and contours, off site planting, PRoW & Bridleway relocation design;
- 2.48 Ref 6.6.2.3: Figure 15 Indicative Approach to Post Consent Design Evolution not included, therefore cannot comment at this stage.

- 2.49 Ref 6.2.2.4-6: These two processes would be better run in tandem, not separately.
- 2.50 Design Codes: General: The Design Codes should apply to the whole length of the Proposed Development, not just the Substation Areas;
- 2.51 Ref DC1: Cost Effective and Efficient denotes primary concern is Applicant requirements and not what is needed to fulfil requirements to landscape and visual elements and what is necessary to integrate the Substation Developments into the rural and agricultural landscape.
- Needs to add: and further Mitigation Measures to be agreed with stakeholders and planning authorities.
- 2.52 Ref DC3: This should not just refer to Detail Design, but should also include agreeing the Landscape Strategy /Landscape Proposals Drawings (The Landscape Institute Stages of Work ...Detail Design is Stage E. Landscape Proposals are currently at Stages C/D and need further refinement.
- 2.53 Ref DC4: How?
- 2.54 Ref DC7: Include for liaising with relevant stakeholders.
- 2.55 Ref DC8: Include Off-Site planting as discussed at pre consent to reduce visual effects

Louise Eccles
Principal Landscape Architect
Highway Operations and Design
Highways and Transport
Lancashire County Council