



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

**Applicants' Response to Public Deadline 4 Submissions**



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# **1 Applicants' Response to IPs' Submissions at Deadline 4**

## **1.1 Introduction**

1.1.1.1 Following Deadline 4, Morgan Offshore Wind Limited and Morecambe Offshore Windfarm Limited (hereafter, 'the Applicants') have reviewed each of the submissions received from stakeholders who registered as Interested Parties (IPs) in the Examination.

1.1.1.2 Details of the Applicants' response to each of the Public IP submissions received at Deadline 4 are set out in this document.

## 2 Applicants' Response to IPs' submissions at Deadline 4

### 2.1 Alan Child

Table 2.1: REP4-142 – Alan Child

Reference	IP submission	Applicants' response
REP4-142 142.1	<p>Dear Mr Cliff,</p> <p>With the regular updates I have received over the last few months and my searches into the Examination Library, I am acutely aware of the complexity of the work you and your team are undertaking as you examine the proposed Morecambe Bay wind farms proposal.</p> <p>Like so many who have raised objections, I am not instinctively opposed to the development of alternative energy sources to secure the UK's future, but this project seems fundamentally flawed.</p> <p>In February of this year I had an article published in The Shooting Times which documented the impact of the cabling route on my shoot which I have developed over the last fifteen years.</p> <p>I posed the question: how "green" is this major infrastructure project?</p> <p>It is fair to say that my small shoot (which follows the Code of Good Shooting Practice and contributes to conservation) is a minor matter when set against the impact of the project on the livelihoods of many farmers and communities in what is a very rural area.</p> <p>I now learn that further investigative work along the cable route is to commence on August 4th and continue until October 21st. This will impact on my shoot with disturbance to my birds and access issues as I fulfil my daily gamekeeping duties.</p>	<p>The Applicants understand Mr Child has an informal arrangement with the landowner for the shoot and have discussed the upcoming survey proposals with him. The Applicants appreciate Mr Child's concerns and will continue to engage with him to explore potential ways in which the impacts upon the shoot could be mitigated.</p> <p>The Applicants acknowledge the impact the construction work may have on the shoot. The Applicants hope that through further engagement, measures can be identified and agreed that could reduce the potential impacts of the Transmission Assets on Mr Childs' shoot.</p>

Reference	IP submission	Applicants' response
	<p>So, why I write to you personally is to document an insignificant personal matter which I believe is symbolic—a microcosm—of the many, many consequences of a flawed project on the lives of so many people which at a personal level will be lost in the massively bureaucratic and legalistic process over which you have oversight and responsibility.</p> <p>Consider please the human cost.</p> <p>Yours faithfully</p>	


## 2.2 Alan Thorpe

**Table 2.2: REP4-143 – Alan Thorpe**

Reference	IP submission	Applicants' response
REP4-143 143.1	<p>I don't feel that the applicant has sufficiently answered any questions regarding noise pollution for the DCO. This is primarily down to there being a convenient conflict of interests between the solicitors. Noise pollution is probably my largest concern with this project and if it were to be built in this ridiculous location, then I would like to know what the applicant is going to do about the 24/7 hum that the substations are going to emit. If this noise pollution affects me in any way then I will not hesitate to seek legal advice and if necessary bring a claim against the applicant. I am sure i will not be alone either. Please could the examining Authority ensure that the applicant addresses the concerns around all aspects of noise pollution thoroughly and completely. Instead of the minimalistic approach they have taken up to now. Thank you.</p>	<p>The Applicants thank Mr Thorpe for his submissions.</p> <p>The Applicants submitted a full statement following Issue Specific Hearing 2 (ISH2) explaining the circumstances arising regarding the noise consultant appointed by Fylde Borough Council (the Council) (see Annex 9.4 Annex 9.4 to Applicants response to Hearing Action Points ISH2 39: Tetra Tech- Conflict of Interest Note - Rev 01 (REP4-112) and understands that all issues are now resolved.</p> <p>The Applicants acknowledge noise and vibration resulting from the construction of the Transmission Assets may lead to adverse impacts and effects, as reported in Volume 3, Chapter 8: Noise and vibration of the Environmental Statement (APP-117). However, the Applicants would like to assure Mr Thorpe that they recognise the potential for such disturbance and have therefore refined a suite of mitigation measures within the Construction Noise and Vibration Management Plan(s) for the projects, which follow best practice and apply appropriate and recognised noise limits, to ensure that noise and vibration will be suitably controlled to minimise adverse impacts and effects on local residents and the wider community. The Noise and Vibration Management plan is secured by Requirement 8 of the draft DCO (REP4-007). An updated outline version of the Noise and Vibration Management Plan has been submitted at Deadline 4 (REP4-032). Operational noise from the substations will also be controlled by Requirement 18 (Control of noise during operational stage) of the DCO.</p>


## 2.3 Annette Sharkey

**Table 2.3: REP4-145 – Annette Sharkey**

Reference	IP submission	Applicants' response
REP4-145 145.1	<p><u>Misleading Substation Information</u></p> <p>Thank you for the opportunity to speak at Issue Specific Hearing 2(ISH2). I attach my speaking notes but I believe they will also be submitted via the Transmission Asset Steering Committee (TASC).</p> <p>In my speech I wanted to focus on the alarming absence of proper visual renderings of the proposed onshore substations—and the consequences this has for assessing impact.</p> <p>I mentioned the Outline Design Principles from September 2024 which included just two images, which appear misleading. In Figure 10, for instance, trees are shown taller than the 30- metre lightning masts—an unrealistic portrayal that risks misinforming both public and planning officials.</p> <p>This is figure 10.</p>  <p><small>Figure 10: View from BW0505016 towards Morgan substation, showing an indicative layout</small></p>	<p>The Applicants welcome Ms Sharkey's attendance at the Issue Specific Hearing 2 and note the photography attached to Ms Sharkey's representation. The Applicants appreciate the concern around the potential landscape and visual impacts and has given this due consideration throughout the assessment and application process.</p> <p>As set out in previous submissions by the Applicants, Volume 3, Chapter 10: Landscape and Visual Resources (APP-123) provided a robust assessment of potential impacts, and this assessment has been undertaken in accordance with recognised best practice and industry-standard guidance, specifically the Guidelines for Landscape and Visual Impact Assessment, Third Edition (GLVIA3). The Applicants therefore maintain that Volume 3, Chapter 10: Landscape and Visual Resources (APP-123) provides a proportionate and robust assessment of likely significant effects, supported by representative viewpoints and visualisations, which were agreed with the relevant planning authorities and statutory consultees prior to the Examination of the Transmission Assets.</p> <p>The Applicants had not previously shared rendered images of the proposed substations prior to the appointment of the technical design partner, as this could have been misleading and misrepresentative of the final design. The technical design partner will be responsible post-consent for refining layouts, informing design development and ensuring alignment with the approved outline design secured in the DCO, which will be progressed in collaboration with the local planning authority (who will be responsible for the discharge of relevant requirements).</p> <p>The Applicants highlight that 18 visualisations were submitted, as part of the DCO Application in September 2024, in support of Volume 3 Chapter 10 Landscape and visual resources (APP-123) in Volume 3, Figures - Part 6 of 7 (APP-136). The submission visualisations have been prepared in accordance with best practices and guidance, representing the Maximum Design Scenario. The Applicants reaffirms that their purpose is to illustrate the likely scale and proportions of the Transmission Assets at both Year 1 and Year 15, in summer and winter conditions, in support of the LVIA, providing an established and widely accepted technique for understanding changes in views and visual amenity.</p>



Reference	IP submission	Applicants' response
		<p>The Applicants acknowledge, for complete transparency, that the original visualisations were resubmitted at Deadline 3 (see REP3-015), in which the Applicants corrected some labelling and presentation of photomontages. No changes were made to the visual representation of each substation's parameters or indicative 3D models depicted in each view.</p> <p>Furthermore, in response to the Examining Authority's First Written Question 13.1.4 (REP3-056), the Applicants submitted at Deadline 3 an <i>indicative</i> 3D illustration of each onshore substation site layout, annotated to show typical structures, equipment and buildings. This aligns with the project description in the EIA and the authorised development defined in the dDCO, and mirrors the design used for the photomontages.</p> <p>Finally, the Applicants acknowledge that visualisations have inherent limitations, as recognised in the Landscape Institute's Technical Guidance Note 06/19: Visual Representation of Development Proposals (2019). Photographs and graphics are illustrative tools that do not fully replicate human perception and must be interpreted alongside fieldwork observations, which inform the LVIA's conclusions. These limitations are set out in Section A.1.5 of Volume 3, Annex 10.4: LVIA Methodology (APP-127), in accordance with best practices. In this context, comments suggesting that "...trees are shown taller than the 30-metre lightning masts..." and that this constitutes "...an unrealistic portrayal that risks misinforming both public and planning officials..." do not acknowledge the documented limitations of the visualisations. The Applicants consider that this identified disparity is a result of <i>depth perspective</i>, whereby the existing trees, being substantively closer to the viewpoint location, and may appear taller than the lightning mast to which the IP submission appears to refer to.</p> <p>On this basis, the Applicants consider that the submitted documentation provides an adequate and proportionate evidence base to understand and assess the likely significant landscape and visual effects of the proposed development and identify the appropriate mitigation measures which are required.</p>
REP4-145 145.2	At ISH2 the inspectors also placed an action on the applicants, as the cross section figures in Doc ref S_D3_7 (PINS ref EN020028) provided at deadline 3 (July 25) appeared misleading. Having visited the sites and noting the slopes appeared to be a lot steeper in reality. On looking at	<p>Regarding Ms Sharkey's comments on the Applicants' submission of topographic information at Deadline 3 and the cut and fill at the onshore substation sites, the Applicants firstly refer Ms Sharkey to paragraph 1.2.5.2 of the Technical Note on Landscape and Design Matters (REP3-064).</p> <p>"The Applicants confirm that, in line with all offshore wind projects and their associated onshore transmission infrastructure, final substation layouts and levels</p>

Reference	IP submission	Applicants' response
	<p>this document the Figure 1 Topographic Context figure also causes concern. See a cut &amp; paste from figure 1 below.</p>  <p>There appears to be quite a bit of cut &amp; fill activity around the Morgan substation, but none around Morecambe. To the untrained eye this appears wrong. If the Rochdale envelope advice note nine is being used then surely there must be cut and fill activity required around Morecambe as well.</p>	<p>will be determined at detailed design stage, informed by technical requirements. Cut and fill will be necessary to create level platforms, particularly at the sloping Morgan OWL site, and will be designed to minimise spoil movement, as described in the Project Description (REP2-008) and oLMP (AS-050)."</p> <p>The Morecambe onshore substation sits on a relatively flat area of ground, however, there will be a some cut and fill activity as set out above to ensure a level platform can be created.</p> <p>Furthermore, the Applicants confirm that its presentation of the existing topography, used in Figure 1 of REP3-064, has been produced from LIDAR Composite Digital Terrain Model (DTM), which is a raster elevation model covering ~99% of England. Produced by the Environment Agency, DTM is used typically to inform parameter-based projects of this nature. The Applicants stand by their presentation of the existing topography, acknowledging the actions to update submitted cross section in response to comment received at the ISH.</p>
<p>REP4-145 145.3</p>	<p>Could I respectfully urge the Examining Authority to require the applicant specifically to address this issue. Without accurate visual renderings it has not been possible for the general public and community to properly assess the full impact of the substations. This DCO should not proceed on the basis of inadequate and misleading information.</p> <p>Thank you.</p>	<p>The Applicants thank Ms Sharkey for the submission and note this response.</p>
<p>REP4-145</p>	<p>Speech: DCO Planning Hearing – Substation Renderings</p>	<p>The Applicants have responded Ms Sharkey's comments on visuals in REP4-145, 145.1.</p>

Reference	IP submission	Applicants' response
145.4	<p>Thank you for the opportunity to speak today.</p> <p>I want to focus on the alarming absence of proper visual renderings of the proposed onshore substations—and the consequences this has for assessing impact.</p> <p>Architectural renderings are essential. They help communities and decision-makers understand how proposed infrastructure will sit within real-world surroundings. Yet in this case, we've had virtually nothing.</p> <p>In the October 2023 Prelim Environmental Info Report, the non-technical summary dedicated just one page to the substations—with no visuals. The supporting volume offered little more than abstract lines levitating over landscapes. Neither use nor ornament! This is not meaningful consultation.</p> <p>The Outline Design Principles from September 2024 included just two images, which appear misleading. In Figure 10, for instance, trees are shown taller than the 30-metre lightning masts—an unrealistic portrayal that risks misinforming both public and planning officials.</p> <p>At the June site visit, pegs marked the substation footprint but were placed just before and removed soon after. There were no connecting tapes to show scale, no indication of height, and no sense of how the sloping terrain might be altered—whether parts of the site would be dug in or built up. All of this matters when evaluating visual and landscape impact.</p>	<p>The Applicants understand the site visit referred to was the Accompanied Site Inspection undertaken by the Examining Authority. The Applicants completed the marking out of the substations in accordance with the request from the Examining Authority.</p>
REP4-145 145.5	<p>This development is on greenbelt land, visible from public rights of way and historic footpaths. These are not just open fields—they are part of a cultural and historical landscape.</p> <p>Consider, for example, the traditional farm buildings along Grange Lane. These structures represent regional heritage. In a previous case (APP/M2325/E/10/212314/NWF), the Planning Inspectorate acknowledged their importance. There will be more heritage assets covered under item 11b.</p>	<p>The Applicants recognise the concerns however would emphasise that the visualisations provided are in line with best practice and have been prepared to ensure that a realistic worst-case assessment can be undertaken.</p> <p>The Applicants are committed to developing the Transmission Assets in a way that is sensitive to the environment, avoiding or minimising potential effects wherever possible, and have engaged with key environmental stakeholders throughout the application process to ensure appropriate mitigation measures can be implemented. Impacts which have the potential to give rise to likely significant effects have been</p>

Reference	IP submission	Applicants' response
	<p>Yet without accurate visualisations, we cannot assess how the substations would affect these settings. We can't see how they might dominate rural views, or how noise and light could disrupt the area's tranquillity.</p> <p>This isn't a minor issue. It's a failure to assess heritage impact properly, as required by national planning policy. Setting isn't just about distance—it's about context, scale, and visual harmony.</p>	<p>carefully assessed and appropriate mitigation identified throughout the Environmental Statement. Those measures are secured through the Requirements set out in Schedules 2A and 2B of the draft DCO (REP4-007). Mitigations are also set out in the updated Commitments Register (REP4-018) submitted at Deadline 4.</p> <p>The matter of heritage and archaeology is discussed in the Applicants' Response to Relevant Representations Part 1 - Introduction and thematic responses (PDA-005) at Section 2.18. The Applicants are committed to respecting the heritage of the local area and Requirement 11 of Schedules 2A and 2B of the draft DCO (REP4-007) requires that detailed Onshore and Intertidal Written Schemes of Investigation will be implemented by the Applicants – this must be approved by the local planning authority and it is a requirement of the draft DCO that Historic England are consulted by the planning authority as part of this process. Further, any archaeological works must be carried out by a suitably qualified and competent person or body, previously notified to the relevant planning authority.</p>
REP4-145 145.6	<p>If the applicant says designs aren't finalised, then worst-case scenario renderings should be provided from key viewpoints— homes, schools, businesses &amp; heritage assets, This is about due process, transparency, and respect for the community. Without visual renderings, this application lacks the evidence needed to assess its full impact.</p> <p>I respectfully urge the Examining Authority to require the applicant to provide full, scaled renderings from critical viewpoints. This DCO should not proceed on the basis of inadequate and misleading information.</p> <p>Thank you.</p>	<p>The Applicants have responded Ms Sharkey's comments on visuals in REP4-145, 145.1.</p>

## 2.4 David Allan

**Table 2.4: REP4-176 – David Allan**

Reference	IP submission	Applicants' response
REP4-176 176.1	<p>The cable corridor and substation for the Morgan and Morecambe offshore wind farm is one of the most objected</p>	<p>The Applicants acknowledge the alternative connection point into Stanah has been a key area of focus in this examination.</p>

Reference	IP submission	Applicants' response
	<p>to national energy infrastructure projects in the country. There is a perfect alternative cabling route further up the coast that would bring local economic benefit, would be more cost-effective as a whole lifecycle project and could connect to existing national grid.</p> <p>The current proposals will create needless adverse economic and environmental impact.</p>	<p>The Applicants provided an initial response on site selection and the assessment of alternatives at section 2.31.1 of The Applicants' Response to Relevant Representations Part 1 - Introduction and thematic responses (PDA-005). Following discussions relating to site selection and alternatives at Issue Specific Hearing 1 and in response to a number of the Examining Authority's Hearing Action Points, the Applicants provided a detailed technical response on these matters, explaining why the proposed alternative connection to Stanah or via an alternative route or Point of Interconnection for the Transmission Assets is not feasible. This was provided at Deadline 1 in Annex 5.2 to the Applicants response to Hearing Action Points: ISH1 6, 8, 9, 19, 26 &amp; 28 - Rev F01 (REP1- 039).</p> <p>National Grid Electricity Transmission have also provided detail as to why a connection at Stanah is not feasible in response to ExQ1 (Q1.2.1 REP3-088).</p>

## 2.5 David Barlow

**Table 2.5: REP4-147 – David Barlow**

Reference	IP submission	Applicants' response
REP4-147 147.1	<p>Please note my action point 47 submission regarding Lower Lane as requested by the EXA for Deadline 4.</p> <p>I live opposite the proposed Morecambe substation [redacted], together with my wife [redacted] and daughter [redacted].</p> <p>I made the point that Lower Lane is a very dangerous road and that it is not suitable to encourage further traffic along that road by allowing the project to install a main entrance or rather a second entrance into the substation within around 70 metres from my property.</p> <p>I know the dangers from personal experience's (3 accidents all caused by people from outwith the area) together with other accidents I have witnessed over the years.</p> <p>As I mentioned at the hearing both the previous owner of my property alongside his sister very sadly lost their lives at the Lower Lane/A584 junction. This road is used by many</p>	<p>The Applicants note and appreciate Mr Barlow's concern regarding previous accidents on Lower Lane. The Applicants wish to emphasise that safety is something the Applicants take seriously, and had previously confirmed at IHS2 (and state again) that no construction traffic for the Transmission Assets infrastructure can or will be routed via Lower Lane. During the operation phase, the access from Lower Lane will not be utilised by HGVs. Details of proposed routes for construction traffic can be found at Figure 7.1 within Volume 3, Figures – Part 4 of 7 (APP-134).</p> <p>Subject to the grant of the DCO, the Applicants would note that the effects of construction traffic and highway works from the Transmission Assets would be managed, monitored and controlled through the development of the detailed Construction Traffic Management Plans (CTMPs). In compliance with Requirement 9 of Schedules 2A and 2B of the draft DCO (REP4- 007), the detailed CTMPs must be agreed with the relevant highway authorities.</p> <p>The Applicants are proposing the installation of a new operational access to the Morecambe substation from Lower Lane as well as the use of two existing accesses for operational accesses to the onshore export cable corridor – to emphasise, the</p>

Reference	IP submission	Applicants' response
	<p>walkers, including my family, lots of cyclists and hackers who have no means of escape due to there being no pathways or footpaths.</p> <p>This particular accident I witnessed and mentioned at the hearing, happened only a month ago on the 30th June where a car ended up on its roof at the Lower Lane junction, making this further proof that the dangers are real. There are many more instances that I have not witnessed in real time however I am aware of them as they are always a talking point within the community.</p> <p>The EXA asked for me to provide the photo I took from my van at the junction and this is shown in attachment 1.</p> <p>To further substantiate my concern`s I would like you to view comments made by Freckleton Parish Council and Fylde Borough Council regarding my own planning application for the installation of 4 x stables, Barn and Sand Paddock. Please bear in mind I had not applied for planning consent for commercial of business use regarding this application, yet both councils took it upon themselves to include these safety provisions and conditions because they felt them to be legitimate safety issues regarding the highway safety for both myself my family and other road users.</p> <p>Please see attachment 2 from the Freckleton Parish Council.</p> <p>You will note that Freckleton Parish Council clearly stated that my property could not be used for any business purposes due to the dangerous nature of Lower Lane. These comments are made by people who live in the village, they are concerned for the community, and hold concerns for people using the road from outside of the community. Like myself, and I have lived here [redacted] years, they know the potential dangers, the applicants don`t, we drive down the road every day, we have to as we live there. The applicants can measure as many widths and install as many cables across the road for traffic counts as they want to suit their narrative but this serves no purpose whatsoever and will not</p>	<p>Applicants would not have consent under the DCO to utilise this access during the construction phase. The Access to Works Plan (APP-157) illustrates on Sheet 13 of 19 that the use of Lower Lane is only for operational access. This is marked by OAR_MGMC_37 &amp; 38 for operational access to the onshore export cable corridor and LSS_MC_02 for operational access to the Morecambe Substation.</p> <p>The Applicants have previously set out the detail relating to access to the Morecambe onshore substation from Lower Lane (for operational purposes) and separately, the A584 (which will be the main construction access, and the access for HGVs during the operation phase), within their response to CAH1_5 which forms part of Hearing Action Points due at Deadline 1 (REP1-037).</p> <p>In regard to the forecast level of use of these proposed operational accesses, Section 3.15.6 of Volume 1, Chapter 4: Project Description of the Environmental Statement (REP2-008) notes that the use of the accesses to the onshore export cable corridor would be for annual (i.e. once a year) routine inspections and that accesses would typically be via Light Goods Vehicle or other 4x4 or multi-terrain vehicle. In regard to the Morecambe substation access, Section 3.15.7 of Volume 1, Chapter 4: Project Description of the Environmental Statement (REP2-008) outlines that the onshore substation will be unmanned, however the operational access will be used for routine visits (the Applicants anticipate that these would generally be monthly) by cars and light goods vehicles only and will facilitate safe access during normal operations.</p> <p>The level of traffic activity outlined would have a negligible effect on local amenity, road safety and access and accordingly, F3.7 Volume 3, Chapter 7: Traffic and transport, Table 7.4 (APP-108) confirms that operational traffic impacts have been scoped out of the assessment with the agreement of the Planning Inspectorate.</p> <p>The Applicants note the Freckleton Parish Council representation regarding Mr Barlow's private planning application.</p>



Reference	IP submission	Applicants' response
	<p>mitigate the potential dangers. I implore the EXA to listen to the community and the people who use this road every day.</p> <p>You will also note from attachment 3 (item 6) that the Fylde Borough Council stated quite clearly and I quote, FBC comments App. No 13/0600 "That the stables and ménage hereby approved shall only be used for private equestrian uses incidental to the occupation of the occupation dwelling ([redacted]). In particular, they shall not be used for commercial livery, horse schooling, rider training or any other commercial purpose. In order to control the extent of the activity associated with this structure in the interests of the open character of the green belt, highway safety and surrounding residential amenity".</p> <p>Having digested these comment's I hope that you will appreciate why I find the M&amp;M application shows a complete contradiction to these concerns when they intend to put a main access to the substation some 70 metres from my house on Lower Lane.</p>	
<p>REP4-147 147.2</p>	<p>Having digested these comment's I hope that you will appreciate why I find the M&amp;M application shows a complete contradiction to these concerns when they intend to put a main access to the substation some 70 metres from my house on Lower Lane.</p> <p>[Redacted] mentioned Lower Lane at SH2 and firmly expressed his objections to using lower lane.</p> <p>Should this DCO be approved and also the use of Lower Lane then this entrance must only be allowed to be constructed and used once this project is finished and commissioned.</p> <p>Allow me please to explain to you exactly what will happen. Firstly, imagine the amount of vans, 4 x 4's and cars that will be using Lower Lane for a project of this magnitude, it will be enormous. Apart from the safety issues on Lower Lane this project will force people to then use Kirkham Rd, on which</p>	<p>The Applicants refer to their response to REP4-147.1 above.</p> <p>The Applicants acknowledge Mr Barlow's concerns and would emphasise that as explained in the Applicants' response to REP4-147.1, that vans, 4 x 4s and cars will not be using Lower Lane for the purposes of construction and will only have the ability to utilise this access during the operational phase and this will not be utilised by HGVs. The Applicants would like to assure Mr Barlow that as this access will not be utilised during the construction phase and will only be used by low volumes of traffic (with no HGVs) during the operational phase, that displacement and consequential safety issues will not take effect.</p>

Reference	IP submission	Applicants' response
	<p>we have an already congested area around the Strike Lane primary school. It will cause grave concerns for the parents of children who go to that school. This area has unfortunately already experienced an unimaginable loss of life and the last thing it needs is for this to happen again. We must listen to the people who live here and not try to mitigate potential dangers to suit the applicant's narrative as one more accident is one to many.</p> <p>I sincerely hope my concerns are recognised and I take this opportunity to thank the EXA panel for allowing me to air my views as a dedicated action point in the interest of public safety.</p>	

**Table 2.6: REP4-148 – David Barlow**

Reference	IP submission	Applicants' response
REP4-148 148.1	<p>As deadline 4 is also open to general submissions and not just action points I would like to inform the EXA of the following.</p> <p>I thank the EXA panel for allowing me action point 47, which I have addressed in a separate submission however I have another equally important issue I raised at SH2 that needs highlighting and addressing.</p> <p>I brought up at the hearing the fact that our relationship with the applicant had now become irreparably damaged.</p> <p>We had one meeting with Dalcour Maclaron at the start of the statutory consultation, not at their request by the way, we had to demand one. The junior representative who came had little knowledge on the project and continually had to apologise for his senior colleague, who could answer the questions, being unable to make the meeting. The only meaningful comment he made was to say we had no right to a view and as the project was not requiring our property or</p>	<p>The Applicants acknowledge Mr Barlow's concerns regarding mental health and wish to emphasise that this is something the Applicants take seriously.</p> <p>The Applicants have previously addressed concerns relating to human health, including consideration of mental health at section 2.19 of The Applicants' Response to Relevant Representations Part 1 - Introduction and thematic responses (PDA-005). This confirms that an assessment of human health (including mental health) is contained in Volume 1 Annex 5.1: Human Health (APP-035). This document also outlines various mitigation measures, which have been developed to ensure the continued health and wellbeing of the local population, as well as how these are secured through the draft Development Consent Order (REP4-007).</p> <p>The Applicants are committed to developing the Transmission Assets in a way that is sensitive to the local environment and community in order to minimise potential effects wherever possible. Impacts which have the potential to give rise to likely significant effects on the local community have been carefully assessed and appropriate mitigation identified throughout the Environmental Statement. Those measures are secured through the Requirements set out in Schedules 2A and 2B of</p>



Reference	IP submission	Applicants' response
	<p>land that compensation would be hard for us to justify and from that day to now we have had no further contact from them.</p> <p>Compensation is not what we are hoping for, what we are hoping for is a right to a peaceful home life and retirement in a property we have put our lives into.</p> <p>Since then I have had to witness, my previously very mentally strong wife [redacted] become a mere shadow of her former self.</p> <p>The strain of all this worrying has very sadly seen a demise in her that is hard to watch and unless you have had experience of this yourself would be unimaginable. The effort it took for her to actually speak to you at SH2 was on its own remarkable knowing her present situation. She showed great courage to do that and It was a very proud moment for me. I know this DCO may not get granted but by the time the decision is made we will have had 3 years of this hell. It's not fair and it's not right, we have been treated as though we don't exist, surely our human rights exist from the start of this application, because that's when my wife started to go downhill and not just starting from when the construction starts, whenever that may be. Should it get passed then years of construction is incomprehensible. I have been affected enormously by this but have to stay as mentally strong as possible to support my family. I have had no support whatsoever and have been put in a position where I need to relocate for my family's sake but cannot now sell my home.</p> <p>Our next and only the second contact that we had with the applicant was the 25th of June this year. I received a visit from [redacted] and representing [redacted] Flotation Energy.</p> <p>[Redacted] took the main role and she was introduced as the senior colleague over [redacted]. Both presented themselves as very polite and pleasant. Regrettably they failed to</p>	<p>the draft DCO (REP4-007). Mitigations are also set out in the updated Commitments Register (REP4-018) submitted at Deadline 4.</p> <p>The Applicants have previously responded to concerns relating to dust and noise within sections 2.4, 2.9 and 2.24 of The Applicants' Response to Relevant Representations Part 1 - Introduction and thematic responses (PDA-005) and again wishes to emphasise that a range of mitigation measures have been proposed in order to reduce the scale of impacts as much as possible.</p> <p>The Applicants acknowledge the strength of Mr Barlow's views regarding the Transmission Assets project and his concerns regarding the impact it may have on his home and surroundings. The Applicants take these concerns seriously and are keen to work with Mr Barlow to address his concerns as far as possible.</p> <p>The Applicants visited Mr Barlow on the 25 June 2025 with the aim of assisting Mr Barlow in further understanding the proposals, answering queries and to assist in providing and explaining the latest information submitted into the examination of the Transmission Assets project. This was subsequently followed by an email issued on the 9 July 2025 directing Mr Barlow to the relevant application documents based on the discussion points raised during the meeting.</p> <p>The Applicants are sorry that Mr Barlow was left feeling disappointed and distrustful towards the project. This was never the Applicants goal and would like to assure Mr Barlow that the Applicants attended the meeting only with good intentions, being open and transparent at all times.</p> <p>The Applicants had hoped the meeting of the 25 June would be the first of many meetings with Mr Barlow in building a positive working relationship. The Applicants received an email on the 9 July 2025, noting Mr Barlow no longer wishes to engage with the Applicants. Whilst the Applicants respect Mr Barlow's decision, the Applicants note that they remain committed to engaging with Mr Barlow in the future should he change his mind. In the meantime, we will continue to keep the community informed as the Transmission Assets project progresses and will endeavour to minimise any impacts as much as reasonably possible. The Applicants also wish to emphasise that notwithstanding Mr Barlow's decision not to engage directly with the Applicants further, that they will continue to consider any representations made by Mr Barlow as part of the examination process.</p>

Reference	IP submission	Applicants' response
	<p>mitigate the effects this is having on our Human Health and Mental Health issues and showed no compassion or solution regarding the situation they have left us in, it was all just a matter of fact.</p> <p>The impression both Myself and my Wife got was this was purely a box ticking exercise in response to my written objective statement put to the EXA regarding Human Health issues.</p> <p>[Redacted] did most of the talking while [redacted] took notes on her laptop. I would say as the person who is probably the nearest to either substation, that their empathy towards us was sadly lacking so god help the receptors further up and further down Lower Lane.</p> <p>They tried to convince us there would be nothing for us to worry about regarding any of our obvious issues relating to Noise, Dust, traffic, visual impacts and the impacts on our life etc. I have worked in the building and construction trade for [redacted] years, I know exactly what's coming down the line.</p> <p>[Redacted] showed me two maps of the Morecombe substation opposite our home. It was made to look like a smallish square building that would be of no real significance to our concerns, surrounded by trees to obscure the view, trees that are not even there by the way and would take 30 years to reach the height of the substations even if they were capable of growing that tall. See the picture shown to us in attachment 1 and the second map showing a difficult to see hand sketched shaded area on the map on attachment 2. This was nothing more than a smokescreen PR exercise and a futile attempt to appease us.</p> <p>I then showed [redacted] the picture I had on my phone (see attachment 3) and asked [redacted] where that picture had come from as it had no resemblance to the one's he had just shown us. When asked where I had got it from I couldn't recall but [redacted] then went on to deny ever having seen</p>	

Reference	IP submission	Applicants' response
	<p>it and that the picture he had shown me was the one I needed to accept as fact, I then showed it to [redacted] and she also denied ever having seen it.</p> <p>Then while looking over [redacted] shoulder as she was scrolling through pictures, I asked her to start scrolling back, she was reluctant to do so and started to scroll forward, when I insisted she keep scrolling back, surprise surprise the exact same picture appeared on her laptop together with other pictures of the substations. They were both embarrassed to say the least and could not now deny not having seen the picture I had shown them. Out of sheer politeness and the fact my wife was visibly becoming more and more upset, I simply said I was very disappointed with them both for lying to us and brought the meeting to an end asap without instigating a confrontation as I could not now believe anything they had said previous or were going to say going forward. Had the wife not been there it may well have been a very different reaction from me.</p> <p>Please compare the two pictures they showed to me to the one I showed them, together with the one put on the screen at SH2. The applicants profess to showing the community the worst case scenarios yet when you look at these pictures you will see they are incomparable and an insult to our intelligence.</p> <p>I really hope that the applicants overall deplorable behaviour, not just to me but to everyone is addressed and they should all maybe be logged under a new appendix reference for everyone to see.</p> <p>My wife`s situation has become even more distressing due to this meeting and my email to in response to [redacted] this meeting left them in do doubt about my feelings.</p>	
<p>REP4-148 148.2</p>	<p>Another issue I have is the following.</p>	<p>The Applicants take safety very seriously and recognise the concerns in relation to aviation. The Applicants are continuing to engage with Blackpool Airport and BAE Systems in relation to this, and are progressing positive discussions to ensure that appropriate mitigation can be secured. The Applicants have previously responded to</p>

Reference	IP submission	Applicants' response
	<p>On the 23rd of August 1944, Freckleton experienced the worst single loss of life by a military aircraft disaster to date and throughout the whole of the second world war.</p> <p>We lost 38 children, a whole generation gone, another 23 other lives lost including teachers, civilians and aircraft crew. We all know the truth about the potential cause for a bird strike and on this subject alone the DCO should not be approved.</p> <p>Nobody knows exactly how these birds will react until the project starts which makes it impossible to mitigate.</p> <p>Freckleton does not deserve this risk no matter how small you think it may be, nobody has the right to even attempt to mitigate it and I implore the panel not to put their name to abating another potential disaster for our community.</p> <p>We don't need it and we don't want it and the applicants don't deserve it, we already have our fair share of industry to deal with and this will destroy what's left of our village. A wind farm and the national grid may go together but this fails on the pure destruction between the wind farm and the grid. Unfortunately for the applicant the two are not close enough together to make this work and it is far too close to Warton Aerodrome.</p> <p>Our community has spoken and they don't want this project, you cannot continue this journey without taking the community with you.</p> <p>The majority of the community have been kept in the dark about this project yet there were still 2300 written objections at the first Have Your Say submission date which proves the community is against it. When you read them all, like I have, you wonder how this project has ever got to the stage we are at now.</p>	<p>this matter further to BAE Systems Warton Aerodrome's comment within document The Applicants' Response to Relevant Representations Part 1 - Introduction and thematic responses (PDA-005) (please see paragraphs 2.21.2.4 to 2.21.2.7) and provided further detail in their Deadline 1 Cover letter (REP1-001). In particular the Applicants have responded to issues around bird strike in their response to Issue Specific Hearing 1 Action Point 40, in the Applicants' response to Hearing Action Points due at Deadline 1 (REP1-037). Further detail on the site selection for the mitigation and biodiversity benefit areas was submitted at Deadline 2 (REP2-046).</p> <p>The Applicants confirmed at Issue Specific Hearing 1 that engagement with BAE is ongoing in order to agree a strategy for a wildlife hazard management plan (see paragraphs 60 - 64 of The Applicants' Hearing Summary of Issue Specific Hearing 1 – Day 2 (REP1- 035)). The Applicants also provided responses in relation to this matter at ISH1_40 of The Applicants' response to Hearing Action Points at Deadline 1 (REP1-037) and provided further detail in relation to engagement with both BAE and Blackpool Airport in the Deadline 1 Cover letter (REP1-001). At Deadline 2, the Applicants have submitted the Strategy for Wildlife Hazard Management Plan (REP2-047) which has been shared with BAE and Blackpool Airport as part of the Applicants ongoing engagement with those bodies as explained in the Applicants responses to Blackpool Airport and BAE written representations in The Applicants Responses to Written Representations from Statutory Consultees and other organisations (REP2-031). At Deadline 3 the Applicants subsequently submitted the Outline Wildlife Hazard Management Plan (REP3-065).</p> <p>The Applicants do not consider that the Transmission Assets project will increase or alter the risk posed by bird strike to aircraft operating out of Warton Aerodrome/Blackpool Airport or that the project will create an increased risk to public safety.</p> <p>It is the Applicants' position that the existing Bird Strike Risk Assessments that are currently in place at Warton Aerodrome and Blackpool Airport (as per the requirements of CAP 772 Wildlife hazard management at aerodromes/airports) would be updated to ensure that, in the unlikely event there would be any changes in bird strike risk as a consequence of the Transmission Assets mitigation, the existing technical mitigation solutions remain appropriate and adequate to ensure no increased risk as a result of the Transmission Assets.</p>

Reference	IP submission	Applicants' response
		<p>An outline Wildlife Hazard Management Plan was submitted at Deadline 3 (REP3-065), as explained within the Strategy for Wildlife Hazard Management Plan (REP2-047) submitted at Deadline 2.</p> <p>The approach to production of an outline Wildlife Hazard Management Plan has been agreed with Blackpool Airport and the Applicants are in the process of discussing updates with the airport, as communicated at Issue Specific Hearing 2. The Applicants note that Blackpool Airport have confirmed acceptance of the Applicants' approach to a Wildlife Hazard Management Plan within their Deadline 4 submission (REP4-129).</p> <p>The Applicants have responded to concerns in relation to Consultation in Section 2.2.2 of their Response to Relevant Representations Part 1 – Introduction and thematic responses (PDA-005) in particular noting that the Acceptance Checklist (s55) (PD-003), noting in particular that the Examining Authority have confirmed the Applicants have complied with all statutory obligations in relation to consultation. In addition to the statutory consultation requirements, the Applicants undertook prior non-statutory engagement, to ensure that the local community was engaged from an early stage in order that feedback could be considered.</p> <p>A number of non-statutory consultations, alongside statutory consultations in accordance with the Planning Act 2008 were held in the vicinity of the proposed Transmission Assets, including online events, exhibitions and pop-up events between November and December 2022, April and June 2023, and October and December 2023. These events were advertised in local newspapers, on local radio, on posters in the local area, through postcards and newsletters distributed through the local area and on social media. Further details can be found in the Consultation Report (APP-170).</p>
REP4-148 148.3	<p>And just a high level comment to finish off, I have recently returned from Copenhagen, whilst there and on an escorted tour of Copenhagen harbour, the narrator bragged about Copenhagen infrastructure Partners CIP being a world leader in renewables yet not allowing their greenbelt countryside and amenity land to be used for this. Copenhagen have no concerns for our countryside just our tax payer subsidies for a private enterprise that does not work as a standalone project. They would not be entertaining this project without tax payer CfD subsidies.</p>	<p>Whilst originating in Denmark, CIP has an established UK base in London and a clear commitment to expanding its role as a developer, owner and operator of renewable energy projects across the UK. This includes offshore wind, onshore wind, solar and battery storage, all of which support UK businesses and create employment opportunities. CIP's offshore wind development partner, COP, has been active in the UK for over a decade, with around 50 employees based at its Edinburgh headquarters.</p> <p>The Morecambe project will remain fully UK-regulated, supplying electricity directly (and exclusively) to the UK national grid. The Applicants therefore emphasise that</p>

Reference	IP submission	Applicants' response
	<p>CfD subsidies are now set at record levels, way above the wholesale market price and could now be agreed over a 20year contract period. That is not energy security that is energy mismanagement that guaranties inflated prices for our country and a guaranteed profit for a foreign investment fund company with little regard for us, our village, Farmers and our greenbelt, just their investors. The government promised us that we would be a world leader in renewables, that's great, but surely that means energy built by us, owned by us and used by us. I realise the wholesale market is complex and that we export and import power on demand from the wholesale market however by offering CfD contracts we pay for the energy at inflated prices 24/7 365 days a year regardless of whether its producing or not. That cannot be right. If we owned the wind farms we would only be paying for the energy that we use as and when needed. Denmark is not offering comparable CfD contracts and they openly admit that our ambitious targets for 2030 and world leading CfD contacts are there to be taken advantage of and have no concern for the mess they leave behind them.</p> <p>So for a Danish investment fund are we really going to risk another potential air disaster for our village, are we really going to risk children`s lives, ruin resident`s life`s and homes, put our tax payers out of business, and destroy our dairy farmers, who for generations have looked after us.</p> <p>I sincerely hope common sense prevails.</p>	<p>these projects will strengthen the UK's energy security while also supporting delivery of the UK's Net Zero commitments.</p>

## 2.6 David Moss

**Table 2.7: REP4-150 – David Moss**

Reference	IP submission	Applicants' response
REP4-150 150.1	Why has it been decided not to bring the cables ashore at Heysham.	The Applicants thank Mr Moss for the submissions. In relation to the projects site selection, the Applicants acknowledge the concerns raised and would refer Mr Moss to Sections 2,3,4,5, and 6 of the Applicants' response to Hearing Action Points: ISH1



Reference	IP submission	Applicants' response
	<p>One of the nuclear plants is scheduled for closure by 2030 and there is direct access to the National grid.</p> <p>The offshore distance may be longer but must be far cheaper overall than the onshore route from Squires Gate to Penwortham route which appears to be the current proposal. The disruption over many years would enormous together with loss of valuable farmland.</p> <p>I have heard that it is because the offshore transmission is paid for by the wind farm developers whereas the onshore transmission is infrastructure and therefore government.</p> <p>It is therefore in their interest to get the shortest offshore route, ie Squires Gate.</p> <p>Please can you tell me why the Heysham route was ruled out as I can find no reference to it in any early studies.</p>	<p>6, 8, 9, 19, 26 &amp; 28 (REP1-039). In particular, the Applicants refer Mr Moss to Sections 3.2 - 3.5 of REP1-039, which explain the process by which those with the relevant expertise and whole-system view (NESO and NGET) were engaged in identifying the Point of Interconnection at the National Grid Penwortham substation.</p> <p>The optimum route in terms of minimising impacts, costs and ensuring feasible delivery for an onshore grid connection is generally considered to be the shortest route from A to B from landfall to the National Grid Penwortham substation with consideration of a range of constraints which are then considered when 'micro-siting' the cable. The final route presented is considered to effectively achieve this, within the environmental, technical and social constraints that have been identified along the proposed onshore export cable corridor route.</p>

## 2.7 Debra Karen Jean Helme

**Table 2.8: REP4-151 – Debra Karen Jean Helme**

Reference	IP submission	Applicants' response
REP4-151 151.1	<p>At the last inspectorate meeting (Tuesday), I witnessed Morgan and Morcambe (M&amp;M) employees stubbornly refuse to acknowledge the risk of bird strike with high velocity combat aircraft, which their project poses. They did this by:</p> <p>Failing to produce data from meaningful research. The baseline bird survey that was carried out for M&amp;M fails to address the actual peril posed by future bird populations and their new habitats after displacement by trenching through their old habitats and thereby destroying them. A much more comprehensive study is needed to determine projections of new bird habitat locations and numbers. M&amp;M seem to stubbornly holding on to the idea that a baseline study carried out for Blackpool airport (several miles from BAe) will suffice. It will not. This seems lazy research, at best or</p>	<p>The Applicants take safety very seriously and recognise the concerns in relation to aviation. The Applicants are continuing to engage with Blackpool Airport and BAE Systems in relation to this, and are progressing positive discussions to ensure that appropriate mitigation can be secured. The Applicants have previously responded to this matter further to BAE Systems Warton Aerodrome comment within document The Applicants' Response to Relevant Representations Part 1 - Introduction and thematic responses (PDA-005), please see paragraphs 2.21.2.4 to 2.21.2.7 and provided further detail in their Deadline 1 Cover letter (REP1-001). In particular the Applicants have responded to issues around bird strike in their response to Issue Specific Hearing 1 Action Point 40, in the Applicants' response to Hearing Action Points due at Deadline 1 (REP-037). Further detail on the site selection for the mitigation and biodiversity benefit areas was submitted at Deadline 2 (REP2-046).</p> <p>The Applicants confirmed at Issue Specific Hearing 1 that engagement with BAE is ongoing in order to agree a strategy for a bird strike management plan (see</p>

Reference	IP submission	Applicants' response
	<p>refusal to do the appropriate research, for cost or other hidden reasons, at worst.</p> <p>M7M seem to be rigidly adhering to the idea that any risks mitigated at Blackpool Airport will do very well for BAe – it being a place that also deals with planes. I heard an M&amp;M spokesperson robotically repeat the arrangements made with Blackpool Airport when asked any question regarding risks to BAe and the surrounding area, by the inspectorate.</p> <p>Comparing BAe to Blackpool Airport is like comparing an Aircraft carrier to a car ferry – in that they both carry vehicles. It is ludicrous. Both are vastly different air operations.</p> <p>Blackpool rarely has high velocity war aircraft taking off from the runways. I have lived next to the airport for over 5 years and have only seen a once yearly Tornado taking off for the Blackpool Airshow. I see small private jets, sometimes. BAe tests numerous powerful war planes that have completed construction, over a densely populated area. Any enhancement of the bird strike risk is unacceptable. The resulting loss of life due to bird strike could be catastrophic (and due to speed at take-off or landing could bank off and crash at one of the several villages or towns along its test route – one of them being mine). Any downplaying or short-cut to writing off the safety objections of BAe is unacceptable, as it is a significant threat to human life.</p> <p>Paul Forshaw from BAe made the statement 'Some risks cannot be mitigated' at the first round of inspectorate meetings. I have not heard any meaningful information from M&amp;M that contradicts this. It seems as though they would rather stealthily dodge the irritating safety issue than address it.</p> <p>Errors in M&amp;M seeing, understanding and addressing the BAe safety risk, at the very outset of the project, as evidenced by the M&amp;M lawyer claiming that there did not exist information about this in the initial documents, give me</p>	<p>paragraphs 60 - 64 of The Applicants' Hearing Summary of Issue Specific Hearing 1 – Day 2 (REP1- 035)). The Applicants also provided responses in relation to this matter at ISH1_40 of The Applicants' response to Hearing Action Points at Deadline 1 (REP1-037) and provided further detail in relation to engagement with both BAE and Blackpool Airport in the Deadline 1 Cover letter (REP1-001). At Deadline 2, the Applicants submitted the Strategy for Wildlife Hazard Management Plan (REP2-047) which has been shared with BAE and Blackpool Airport as part of the Applicants ongoing engagement with those bodies as explained in the Applicants responses to Blackpool Airport and BAE written representations in The Applicants Responses to Written Representations from Statutory Consultees and other organisations (REP2-031). At Deadline 3 the Applicants subsequently submitted the Outline Wildlife Hazard Management Plan (REP3-065).</p> <p>It is the Applicants' position that the existing Bird Strike Risk Assessments that are currently in place at Warton Aerodrome and Blackpool Airport (as per the requirements of CAP 772 Wildlife hazard management at aerodromes/airports) would be updated to ensure that, in the unlikely event there would be any changes in bird strike risk as a consequence of the Transmission Assets mitigation, the existing technical mitigation solutions remain appropriate.</p> <p>The Applicants acknowledge that there are similarities and differences in the nature of the flying operations at Warton Aerodrome and Blackpool Airport. However, the over-riding factor is that both airports are licensed and regulated under the CAA, which publishes extensive regulatory documents to outline the processes and procedures licence holders must undertake to safeguard the flying operation. Those regulations are applicable to all licensed aerodromes irrespective of the nature of the flying operation; airports supporting flying training, airports supporting large passenger aircraft, airports supporting test and evaluation activities, and airports supporting military operations are all subject to the same regulations. The approach to production of an outline Wildlife Hazard Management Plan has been agreed with Blackpool Airport and the Applicants are in the process of discussing updates with the airport, as communicated at Issue Specific Hearing 2. The Applicants Baseline Bird Note (REP3-060) and the Outline Wildlife Hazard Management Plan (REP3-065) submitted at Deadline 3 consider bird numbers and the pattern of use, building upon the information included in the submission of REP2-018. The Applicants recognise that this information will be supplemented and updated following further provision of information from BAE Systems (as referred to in response to REP2-052.7).</p>



Reference	IP submission	Applicants' response
	<p>zero confidence that they meaningfully understand the nature of BAe and the surrounding area.</p> <p>A conversation, with an M&amp;M worker, who claimed to be an environmentalist, revealed to me that he did not have a working knowledge of the shoreline. I had to draw a rudimentary map to correct the errors of his understanding. This is not good. Surely, living here, we have a right to expect those who wish to put cables into our land, have had the decency to properly know the area that they will trench?</p> <p>Sitting in the recent inspectorate meetings, I became extremely uncomfortable at the nature of the Blackpool Council lawyer, [redacted], connection with M&amp;M employees. At breaks, I witnessed, at close hand, her crouching by the seat of a female M&amp;M employee, in a friendly and casual way, both of them enjoying a joke together, evidenced by their mutual laughing. This made me question their connection – why at a business meeting – would a lawyer for an interested party have such a familiar connection with the project proposer?</p> <p>This led me to wonder why Blackpool Council had employed a lawyer at local council tax payers' expense. The local parish councils have employed a lawyer to represent them, out of their collective pockets. Fylde Council has no lawyer and I believe the other councils do not, either.</p> <p>It seems irregular that Blackpool Airport has suddenly easily overcome any objections (and that there are some changes made by M&amp;M). M&amp;M seem to wish to use this as leverage to apply pressure to BAe. I wonder what part the Blackpool Council lawyer, funded from the public purse has played – what deal has been brokered?</p> <p>This also puts me in mind of the 'Non-Disclosure Agreement' that M&amp;M have with Blackpool Council (where information that should be in the public domain has been legally hidden, at the public expense).</p>	<p>The Applicants have provided a Wildlife Attractants Habitat Risk Assessment as part of the Deadline 5 submission (S_D5_17), based on the process referred to in the CAP 772 and the MAA RA 3270 guidance, and through engagement with Blackpool Airport. The Applicants provided this to BAe and met with BAe on Monday 15<sup>th</sup> September to discuss the conclusions and receive feedback to inform updates in advance of submission at Deadline 5. The Applicants note that the DIO also attended the meeting, providing additional information in respect to their interests. Both BAe and DIO noted that the information provided in the risk assessment (S_D5_17) was the level of detail that they would expect to see and they would be better able to confirm their position on the outcome following full review and review from the DIO's subject matter expert. DIO noted that the proposed management, design commitments and monitoring were aligned to similar measures that have been used for other developments.</p> <p>The Applicants require BAe on behalf of Warton Aerodrome to confirm the conclusions of the assessment, or to provide the Term Safety Plan and Strike Rate Probability Index referred to in REP3-073 so that the Applicants may undertake the bird strike risk assessment on behalf of Warton Aerodrome to confirm that there is no increased bird strike risk. The Applicants require the DIO to provide confirmation that their interests can also be appropriately managed.</p> <p>The Applicants remain confident that with the application of appropriate passive and active mitigation, as outlined in the Wildlife Attractants Habitat Risk Assessment (S_D5_17) appended to the outline Wildlife Hazard Management Plan, that there will be no increase to bird strike risk or that the projects will create an increased risk to public safety. With regard to the M&amp;M employee liaising with Blackpool Council's lawyer, the Applicants are committed to working with our stakeholders and were speaking to Blackpool Borough Council, to seek to resolve concerns wherever possible.</p> <p>The Applicants would clarify that the use of non-disclosure agreements (NDAs) is standard practice where potential impacts to commercial operations are being discussed between parties. The Applicants have exchanged information with Blackpool Airport over a period of time and this process has culminated in the agreement of the cooperation agreement and the Applicants being able to satisfy Blackpool Airports' concerns.</p> <p>The Applicants refer to their hearing summary (REP4-103, paragraph 155) which confirms that an NDA is being negotiated with BAe Systems. This is to facilitate provision of Warton Aerodrome's Wildlife and Habitat Hazard Management Plan,</p>

Reference	IP submission	Applicants' response
	I have considerable discomfort with these issues because there is an irregularity here.	Term Safety Plan and Strike Rate Probability Index to support the Applicants' ongoing workstreams with BAE Systems to demonstrate that bird strike risk will not materialise, and create the opportunity to provide the same level of reassurance as has been reached with Blackpool Airport.

## 2.8 Dr. David MacGregor

**Table 2.9: REP4-149 – Dr. David MacGregor**

Reference	IP submission	Applicants' response
REP4-149 149.1	<p>I note that with regard to the applicants updated and amended submission, there is still an intention to run secondary cables along the north side of Blackpool Rd Playing fields (WN 15A15B, 53A53B and 54A54B)</p> <p>Firstly, as has been admitted in verbal statements and previous documentation the applicants unwillingness to utilise a shared trench inside the airport perimeter is not down to any technical considerations or the results of survey data but that there are two distinct corporate entities involved and that they are seemingly unable or unwilling to utilise shared channels on some parts of the route. This has also been admitted by both parties land agents who attended a meeting with local residents. If as they state both corporate entities at least agree on as they purport "causing minimum disruption" within the project then why are two separate routes planned at the points stated above.</p>	The Applicants note the comments of Dr MacGregor however there is a need for project separation which the Applicants' have set out in Section 8 of document Annex 5.2 to the Applicants response to Hearing Action Points: ISH1 6, 8, 9, 19, 26 & 28 - Rev F01 (REP1-039). In delivering the Transmission Assets, greater certainty can be given at the post consent stage where relevant planning authorities and others will be involved in approval of stages of the construction of the Transmission Assets. The Applicants are committed to reducing impacts wherever possible, and have now proposed to establish a Construction Coordination Working Group post-consent, which would involve specific engagement with the local planning authorities, to facilitate the exploration of opportunities and measures for coordination where possible and practicable between the projects in order to minimise impacts.
REP4-149 149.2	<p>Further to this land within the outline plans and access to Fieldway (FY8 3BL) is an issue that remains unresolved. M+M's land agents state that there are no access issues to Fieldway, yet their plans suggest otherwise at the crossing point at Leach Lane. There is also a parcel of partly unadopted land and partly an area that falls under the control of Fieldway residents that remains unresolved but that falls within the plan parameters. M=M and their land</p>	With regard to Leach Lane, the Applicants have committed to maintaining access, with works completed on a 'half / half basis' with traffic to be controlled through the use of temporary traffic management, such as traffic signals. The open cut trenching on Leach Lane is not expected to result in any road closures and vehicular access would always be maintained including emergency services and for buses. The Applicants refer to the drawing of Access A5 within the outline Highway Access Management Plan submitted at Deadline 4 (REP4-060) for visualisation of the proposed access design adjacent to Fieldway. This access design has been

Reference	IP submission	Applicants' response
	agents have been contacted on three occasions and to date no reply has been forthcoming.	<p>reviewed by Lancashire County Council as the highway authority and they have agreed that the principles of the design are appropriate. The Applicants can confirm that there are no access issues to Fieldway. The extent of the order land at this location is confined to the adopted highway boundary.</p> <p>The Applicants refer to paragraph 4.2.4 of their Consultation Report (APP-170) which sets out the process followed for consultation and identification of persons with an interest in the land. It was noted in the Applicants response to REP1-139.01 where the Applicants requested proof of ownership be provided by Dr Macgregor to confirm interest along with the other relevant parties identified. The Applicants recognise the concerns raised and will further engage with Dr MacGregor to resolve the matter fully.</p>
REP4-149 149.3	<p>Finally, there has been no acknowledgment by M+M and their agents that a secondary large infrastructure project has been applied for an scheduled on airport land to the east and south east of the applicant's intended route, that being a large solar farm.</p> <p>Once again, this I feel demonstrates Morgan and Morecambe and their agents lack of awareness of the local environment, their confused and ill thought reasoning and route planning and their willingness to incur and absorb significant increased costs due to issues which in another better planned, better managed project would not arise.</p>	<p>The Applicants are aware of the proposed solar farm at Blackpool Airport and note that it was confirmed by Fylde Borough Council that it was not EIA development in August 2024. However, since then no planning application for the proposed solar farm has been submitted and it has therefore not been possible for the Applicants to consider this in any greater level of detail.</p> <p>The Applicants can confirm that the Solar Farm (Ref 24/0478) was included within the cumulative assessment as outlined in Volume 1, Annex 5.5: Cumulative Screening Matrix and Location Plan of the Environmental Statement (APP-039).</p>

## 2.9 Fylde Against Cable Transmission and Substations (F.A.C.T.S.)

**Table 2.10: REP4-133 – F.A.C.T.S.**

Reference	IP submission	Applicants' response
REP4-133 133.1	My questions clarify and detail the enquiries I made of the Applicant verbally after lunch on Wednesday 30th July at AFC Fylde venue.. These specifically relate to questions of vibration and excavation as they affect the pipelines (referred to below).	<p>The Applicants recognise the concerns raised, and in order to ensure safe and appropriate construction, detailed ground investigations will be undertaken post-consent to inform the final cable route design and construction methodology.</p> <p>As part of the project development the Applicants have engaged with all known and identified statutory undertakers, utility operators and private asset owners. The</p>

Reference	IP submission	Applicants' response
	<p>I should like answers in detail to the questions I now pose. For the avoidance of doubt these include ALL Pipelines including the flammable ones such as the Liquid Ethylene and LPG lines.</p> <p>Q1. What investigations have been undertaken (and evidence available for other to scrutinise) to ensure other existing pipelines/utilities have been fully considered and will not be damaged (causing risk and danger to others) as a consequence of:</p> <p>ground vibration (irrespective of location)</p> <p>compaction through your vehicles running over them (non highway location) or</p> <p>as a consequence of digging trenches (non highway location)</p> <p>Q2. Where there is conflict with existing pipelines/utilities what enquiries have been made to ensure one can safely bridge the other</p> <p>Q3. At what stage will detail arrangements be made to ensure coordination and that risk is suitably/and can be managed.</p> <p>Note: existing pipelines not only include the usual water, gas, electricity and telecommunications (fibreoptics), serving the built environment, but also NATS radar station (off Lytham St. Annes Way), all following the public highway. I am aware that there are pipelines (including flammable)/utilities under fields.</p>	<p>Applicants have followed an industry best practice approach in identifying these interests that included:</p> <ul style="list-style-type: none"> <li>• a formal utility search procured from Atkins Limited who are an experienced provider in the industry,</li> <li>• full title interrogation of all registered titles within the Red Line Boundary to identify registered charges, easements and other rights of any assets,</li> <li>• issue of Land Interest Questionnaires to all identified interests in any parcel within the order limits requesting confirmation of the data we held and any additional data not previously known or disclosed.</li> </ul> <p>Through this process and following receipt of the composite utility search data from Atkins, the Applicants have mapped all known and identified assets across the order limits within the Onshore Crossing Schedule (REP1-016 and REP1-018). A programme of intrusive site investigations will be undertaken at the locations identified, with results from these investigations used to characterise ground conditions and to undertake a controlled risk assessment that will inform the detailed design on the trenchless technique locations.</p> <p>The detailed design will reflect the complexity of the crossing method and the entry and exit pit locations and the depth of the crossing. Therefore, trenchless technique installations will be designed at sufficient depths to prevent interaction with existing infrastructure. In addition, protective provisions with relevant asset owners and statutory bodies are being negotiated with the relevant parties and these will be secured within Schedule 10 of the draft DCO (REP4-008), ensuring the continued safe operation of existing infrastructure throughout construction and operation of the Transmission Assets.</p> <p>The Applicants are committed to reducing impacts wherever possible and have now proposed to establish a Construction Coordination Working Group post-consent, which would involve specific engagement with the local planning authorities, to facilitate the exploration of opportunities and measures for coordination where possible and practicable between the projects in order to minimise impacts.</p>

## 2.10 Gillian Fielding

**Table 2.11: REP4-152 – Gillian Fielding**

Reference	IP submission	Applicants' response
REP4-152 152.1	<p>As a member of the general public who will be affected by the disruption of this project at the beach and going round the care home and nature reserve I suspect it will be noise/ vibration and traffic the take away for me at the hearings is this project is two trying to be one and we still have no clarity on how long we will be subjected to this project or if they will run together or how long in between I don't think this is acceptable and it should be made to run together or rejected</p> <p>I understand it from their perspective and it's all about funding for them this could end up being years?</p>	<p>The Applicants thank Ms Fielding for the submissions and recognise the concerns raised.</p> <p>In relation to overall construction periods, the Applicants have provided consideration of potential construction scenarios and durations in their Rule 9 – ES assessment of Construction Scenarios (AS-070) at Section 1.5. The Applicants further explained their approach to construction scenarios and coordination between Morgan OWL and Morecambe OWL at Issue Specific Hearing 1 (see in particular paragraphs 11 - 34 of The Applicants' Hearing Summary of Issue Specific Hearing 1 – Day 2 (REP1-035)). Following the hearings, the Applicants have also provided further clarification regarding how Morgan OWL and Morecambe OWL will continue to work together post consent to deliver the two projects comprised within the Transmission Assets with a view to minimising impacts on local communities wherever practicable. This is set out in Section 7 of Annex 5.2 to the Applicants response to Hearing Action Points: ISH1 6, 8, 9, 19, 26 &amp; 28 - Rev F01 (REP1-039).</p> <p>There is a need for project separation which the Applicants' have set out in Section 8 of document Annex 5.2 to the Applicants response to Hearing Action Points: ISH1 6, 8, 9, 19, 26 &amp; 28 - Rev F01 (REP1-039). In delivering the Transmission Assets greater certainty can be given in the post consent stage where relevant planning authorities and others will be involved in approval of stages of the construction of the Transmission Assets.</p>
REP4-152 152.2	<p>I also feel that they should not be making changes at this late stage in the process they state minor and within the order limits I think they should have a consultation on this change it is going to have an impact temporary or not on people so what seems minor to them may not be minor for people these changes affect</p>	<p>The Applicants do not consider it necessary or justified for there to be any extension to the examination period for the Transmission Assets application. The examination process has been rigorous and transparent and has provided opportunities for the public and all stakeholders to have their say orally and in writing in accordance with the statutory framework prescribed by the Planning Act 2008.</p> <p>The Applicants are committed to reducing impacts wherever possible and have now proposed to establish a Construction Coordination Working Group post-consent, which would involve specific engagement with the local planning authorities, to facilitate the exploration of opportunities and measures for coordination where possible and practicable between the projects in order to minimise impacts.</p>

Reference	IP submission	Applicants' response
REP4-152 152.3	this project should not be allowed to take prime farm land or green belt land I always believed a NSIP project was because there was no other way but as stated on more than one occasion there is the potential of another route this project could be delivered	<p>The Applicants recognise the concerns raised in relation to the siting of the development on green belt land and wishes to emphasise that this was given due consideration as part of the site selection and environmental assessment process. The Applicants are committed to developing the Transmission Assets in a way that is sensitive to the environment, avoiding or minimising potential effects wherever possible.</p> <p>The Applicants undertook a robust site selection and refinement exercise when identifying potential sites for the substations which is documented in Chapter 4 of the ES (AS-026) and its associated Annex 4.3 (AS-028). The Applicants also submitted a Green Belt Technical Note (REP3-069) at D3 (which was subsequently updated at Deadline 4 (REP4-092), which clearly demonstrates (with the help of an additional onshore constraints map) that there were no suitable alternative sites outside the Green Belt in which the substations could reasonably have been accommodated without resulting in significant environmental impacts The Applicants have proposed a wide range of mitigation measures in order to reduce the scale of potential impact upon the wider green belt area. The Applicants provided an initial response on site selection and the assessment of alternatives at section 2.31.1 of The Applicants' Response to Relevant Representations Part 1 - Introduction and thematic responses (PDA-005). Following discussions relating to site selection and alternatives at Issue Specific Hearing 1 and in response to a number of the Examining Authority's Hearing Action Points, the Applicants provided a detailed technical response on these matters including explaining why the proposed alternative connection to Stanah or via an alternative route or Point of Interconnection for the Transmission Assets is not feasible. This was provided at Deadline 1 in Annex 5.2 to the Applicants response to Hearing Action Points: ISH1 6, 8, 9, 19, 26 &amp; 28 - Rev F01 (REP1- 039).</p> <p>National Grid Electricity Transmission have also provided detail as to why a connection at Stanah is not feasible in response to ExQ1 (Q1.2.1 REP3-088).</p>



## 2.11 Hilary Margaret Angus

**Table 2.12: REP4-154 – Hilary Margaret Angus**

Reference	IP submission	Applicants' response
REP4-154 154.1	<p>Following the meetings at Mill Farm last week I am more concerned than ever that this project is looking like an unmitigated disaster. The applicants have clearly failed in communicating properly with community groups and individuals, landowners, farmers and local authorities. Then there is the general vagueness/lack of detail about mitigation in a number of areas. A new and worrying aspect was the gas pipeline which needs to be crossed. The applicants appeared to shrug this off as a minor inconvenience which they would get round...or under or over! The change request application in respect of the football ground was vague. There are a number of unanswered questions about the height of the substations in respect of the chosen plot. Nobody knows what they will look like. The question of blight remains unanswered. Thank goodness for the Examination Authority and their excellent questioning. I hope that most of these matters will be resolved/answered by the applicants by the relevant deadlines.</p>	<p>The Applicants thank Ms Angus for the submissions. The Applicants would emphasise that consultation with the community and our stakeholders has been an imperative part of the application process. The Applicants have responded to concerns in relation to Consultation in Section 2.2.2 of their Response to Relevant Representations Part 1 – Introduction and thematic responses (PDA-005), noting in particular that the Examining Authority have confirmed the Applicants have complied with all statutory obligations in relation to consultation. In addition to the statutory consultation requirements, the Applicants undertook prior non-statutory engagement, to ensure that the local community was engaged from an early stage in order that feedback could be considered.</p> <p>A number of these non-statutory consultations, alongside statutory consultations in accordance with the Planning Act 2008, were held in the vicinity of the proposed Transmission Assets, including online events, exhibitions and pop-up events between November and December 2022, April and June 2023, and October and December 2023. These events were advertised in local newspapers, on local radio, on posters in the local area, through postcards and newsletters distributed through the local area and on social media. Further details can be found in the Consultation Report (APP-170). The Applicants have assessed potential adverse impacts through their environmental impact assessment reported through the relevant chapters of the Environmental Statement (ES). The ES identifies appropriate mitigation measures to minimise those impacts which are secured through the Requirements set out in Schedules 2A and 2B of the draft DCO (REP4-007). The Applicants remain committed to engaging with stakeholders and keeping the community informed as the project progresses.</p> <p>To ensure safe and appropriate construction, detailed ground investigations will be undertaken post-consent to inform the final cable route design and construction methodology.</p> <p>As part of the project development the Applicants have engaged with all known and identified statutory undertakers, utility operators and private asset owners. The Applicants have followed an industry standard approach in identifying these interests that included:</p>

Reference	IP submission	Applicants' response
		<ul style="list-style-type: none"> <li>• a formal utility search procured from Atkins Limited who are an experienced provider in the industry,</li> <li>• full title interrogation of all registered titles within the Red Line Boundary to identify registered charges, easements and other rights of any assets,</li> <li>• issue of Land Interest Questionnaires to all identified interests in any parcel within the order limits requesting confirmation of the data we held and any additional data not previously known or disclosed.</li> </ul> <p>Through this process and following receipt of the composite utility search data from Atkins, the Applicants have mapped all known and identified assets (including the SABIC pipeline) across the order limits within the Onshore Crossing Schedule (REP1-016 and REP1-018). A programme of intrusive site investigations will be undertaken at the locations identified, with results from these investigations used to characterise ground conditions and to undertake a controlled risk assessment that will inform the detailed design on the trenchless technique locations.</p> <p>The detailed design will reflect the complexity of the crossing method and the entry and exit pit locations and the depth of the crossing. Therefore, trenchless technique installations will be designed at sufficient depths to prevent interaction with existing infrastructure – this is important from both the perspective of protecting the existing infrastructure and also from the perspective of ensuring the safe installation and operation of the Transmission Assets. It is also therefore very much in the Applicants interest to ensure that existing infrastructure is appropriately managed. In addition, protective provisions with relevant asset owners and statutory bodies are secured within Schedule 10 of the draft DCO (REP4-008), ensuring the continued safe operation of existing infrastructure throughout construction and operation of the Transmission Assets.</p> <p>The Applicants provided a note setting out the position on blight at Deadline 4 (REP4-123). This contains a commitment to reviewing and updating the approach to Blight within the Property Cost Estimates (APP-009 and APP-010) that form part of the Funding Statement. The Property Cost Estimates (updated at Deadline 5, Document Refs D1.3/F03 and D1.4/F03) in response to ExA questions on blight.</p> <p>With regard to the Change Request at Blackpool Road Recreational Ground, this entails a reduction to the Order Limits, which will also reduce the interaction with one of the St Annes Football Club 11-a-side pitches. A full suite of documents regarding the Change Request was submitted on the 8 August 2025 and remain available to on the Transmission Assets website. The Applicants also conducted a non-statutory</p>



Reference	IP submission	Applicants' response
		consultation regarding the Change Request with relevant parties, and further information can be found in the Change Request Consultation Report submitted at Deadline 5 (document reference S_MMCR_22).

## 2.12 John Battersby

**Table 2.13: REP4-156 – John Battersby**

Reference	IP submission	Applicants' response
REP4-156 156.1	<p>I am making my submission with regard to my concerns at the impact the proposed Morgan and Morecambe windfarm project during construction and thereafter.</p> <p>This is particularly concerning given the location of the proposed siting of the substations which will be located extremely close to schools and housing estates.</p> <p>There is no doubt looking at research world wide that there would be significant impact on the physical, mental, educational and social health particularly of children but of the general population of the communities of the Fylde.</p> <p><i>Negative Impact of Noise and Noise Sensitivity on Mental Health in Childhood</i></p> <p><i>Lim, Jongseok; Kweon, Kukju; Kim, Hyo-Won<sup>1</sup>; Cho, Seung Woo<sup>2</sup>; Park, Jangho; Sim, Chang</i></p> <p><i>In this population-based study conducted in two large cities in South Korea, elementary and middle-school students were included. After direct measurements at the selected sites, a noise map was created using an interpolation method. The road traffic noise of the participants' residential areas was calculated based on this noise map. Noise sensitivity was assessed. Using multivariate logistic regression, The relationship between noise, noise sensitivity, and the Child Behaviour was investigated.</i></p>	<p>The Applicants thank Mr Battersby for the submissions and note the concerns regarding the proximity of schools to the onshore substations and onshore export cable corridor. The Applicants have undertaken a rigorous and robust route planning and site selection process in relation to the onshore infrastructure for the Transmission Assets. This included the siting of infrastructure away from sensitive receptors such as schools. The nearest school (Carr Hill High School) is approximately 330m from the Transmission Assets Order Limits which is the closest point at which the onshore export cables could be installed. Strike Lane Primary School is approximately 400 m from the Transmission Assets Order Limits (i.e. the closet point to the school at which the onshore export cables construction activities could take place (Work No.34A34B)).</p> <p>The Applicants recognise the importance of these issues and have undertaken an assessment of vulnerable groups within the Human Health Annex (APP-035), which includes consideration of impacts on young people and schools, including traffic related impacts and summarises relevant mitigation measures to manage and minimise potential impacts during construction and operation of the Transmission Assets.</p> <p>The Applicants acknowledge noise and vibration resulting from the construction of the Transmission Assets may lead to adverse impacts and effects, as reported in APP-117 and indicated in the Applicants response to REP1-214.17. However, with the implementation of mitigation measures to be detailed within the Construction Noise and Vibration Management Plan(s) for the Projects, noise and vibration will be suitably controlled to minimise adverse impacts and effects, which is secured by Requirement 8 of the draft DCO (REP4-007). The Applicants take the potential for impacts to the local community and in particular impacts to young people very seriously, and an updated outline version of the Noise and Vibration Management</p>

Reference	IP submission	Applicants' response
	<p><i>Living in noisy environments can negatively impact a child's general sense of well-being and overall quality of life. Children in the area where the substations will be located will be living, being educated, playing, socialising and sleeping with no respite from noise.</i></p> <p><i>Psychological Stress: Noise can contribute to psychological stress and anxiety, potentially impacting a child's overall well-being.</i></p> <p><i>Sleep Disruption: Noise can disrupt sleep patterns, which are vital for physical and cognitive recovery.</i></p> <p><i>Learned Helplessness: In noisy environments, children may develop learned helplessness, characterized by a lack of motivation to learn due to a perceived lack of control over their environment.</i></p> <p><i>Behavioral Problems: Environmental noise, has been linked to behavioral difficulties in children.</i></p> <p><i>Increased Hyperactivity: Studies have found an association between noise exposure and increased hyperactivity symptoms in children.</i></p> <p><i>Brain Development: Research suggests that noise can disrupt crucial brain development stages, particularly in the context of cognitive function.</i></p> <p><i>Working Memory: Verbal working memory, which is essential for processing and retaining information, can be negatively impacted.</i></p> <p><i>Language Development: Exposure to excessive noise, particularly during early childhood, can affect speech and language development, impacting the acquisition of vocabulary and communication skills.</i></p> <p><i>Reduced Reading Comprehension: Studies show a correlation between noise exposure and lower reading comprehension scores in children, especially those living near busy transportation routes.</i></p>	<p>Plan was submitted at Deadline 4 (REP4-032) - this sets out various mitigation measures and ensures that potential impacts are reduced as far as possible. Operational noise from the substations will be controlled by Requirement 18 (Control of noise during operational stage) of the DCO.</p>

Reference	IP submission	Applicants' response
	<p><i>Cognitive Development: Impaired Learning: Noise can interfere with a child's ability to focus and concentrate, making it harder to learn new information and retain what they've learned. There is also a suggested link between noise and the growing foetus.</i></p> <p>Noise also negatively affects auditory and non auditory health in adults. With respect to the non auditory health effects of noise, an association among noise exposure and hypertension, cardiovascular diseases, and stroke has been reported. .</p> <p>Studies have reported that noise exposure is associated with emotional distress, sleep disturbances potentially resulting in hallucinations and delusional beliefs, psychosomatic disorders, and increased psychiatric hospital admission rates.</p> <p>Because of these negative effects, noise can impair the quality of life. Among various noise sources, road traffic noise is of special interest, considering its generally wide and usually long exposure. Traffic noise was cited as the second most influential environmental risk factor in a recent European study. However 24/7 noise of the substations will inevitably cause disruption to sleep and impact general well being.</p> <p>Exposure to high levels of noise, particularly from traffic, is associated with an increased risk of dementia, including Alzheimer's disease. Studies have shown that even moderate increases in noise levels can heighten the likelihood of developing dementia, with some evidence suggesting a dose-response relationship, where higher noise levels lead to a greater risk.</p> <p>Looking at the wider context, inevitably stress, sleep deprivation and increasing health issues which is likely to accompany the increased traffic and building and operation of the substations is likely to have a detrimental impact on family life, personal economic situations and relationships.</p>	

Reference	IP submission	Applicants' response
	<p>I would remind you of the close proximity to the schools and homes of the substations and the intended works.</p> <p>Try to imagine if you can having a fractious child unable to sleep because of noise and as a parent or grandparent needing to work also being unable to sleep knowing that the next night and the next night and the one after that it is going to be the same.</p>	

## 2.13 John Howard Duckworth

**Table 2.14: REP4-157 – John Howard Duckworth**

Reference	IP submission	Applicants' response
REP4-157 157.1	<p><b>Item 1 General Matters (Construction Timetable)</b></p> <p>APP-024 F1.3 Volume 1, Chapter 3: Project description Section 3.9 Programme and construction scenarios</p> <p>I own land (LA924541) that has been in the search area. My first visibility in a detailed formal way with this project was in March 2022 when I signed a Non Intrusive Survey Licence with Dalcour McLaren. Since then I have taken a particular interest in this project. Whilst our land is outside the DCO red cable and substation zone, the project will have a major impact on my life during the construction stage and beyond.</p> <p>The above document refers to 3 construction scenarios, one of which is..</p> <ul style="list-style-type: none"> <li>Scenario 2: Concurrent construction i.e., construction of the Morgan Offshore Wind Project: Transmission Assets and the Morecambe Offshore Windfarm: Transmission Assets at the same time</li> </ul> <p>In all the time I have been to pre-DCO public engagements and met directly on our land with Dalcour-Maclaren representatives, Scenario 2 has always been elucidated as the method of construction, there has been no talk or</p>	<p>The Applicants thank Mr Duckworth for the submissions. In relation to overall construction periods, the Applicants have provided consideration of potential construction scenarios and durations in their Rule 9 – ES assessment of Construction Scenarios (AS-070) at Section 1.5. The Applicants further explained their approach to construction scenarios and coordination between Morgan OWL and Morecambe OWL at Issue Specific Hearing 1 (see in particular paragraphs 11 - 34 of The Applicants' Hearing Summary of Issue Specific Hearing 1 – Day 2 (REP1-035)). Following the hearings, the Applicants have also provided further clarification regarding how Morgan OWL and Morecambe OWL will continue to work together post consent to deliver the two projects comprised within the Transmission Assets with a view to minimising impacts on local communities wherever practicable. This is set out in Section 7 of Annex 5.2 to the Applicants response to Hearing Action Points: ISH1 6, 8, 9, 19, 26 &amp; 28 - Rev F01 (REP1-039). The Applicants have also provided further detail regarding their approach to construction of the Transmission Assets in the Agricultural Holdings Indicative Mitigation Plan (REP4-111) and the Onshore Construction Method Statement (REP4-115) submitted at Deadline 4.</p> <p>The Applicants wish to emphasise that construction 'Scenario 3' as referenced is not in any way 'favoured', however the Applicants need to retain the flexibility for separation in construction timelines given that the projects are entirely separate – this four year gap has not been described on the basis that this is specifically</p>

Reference	IP submission	Applicants' response
	<p>discussion of the alternative scenarios. The construction of the cable corridor was described as 6 underground cables, 4 for Morgan and 2 for Morecambe, all 6 being installed simultaneously with a 'typical' construction period of up to 2 years.</p> <p>You can imagine my surprise when on attending the hearing, all of the discussion was about a Scenario 3 Project A and B construction method, namely:</p> <ul style="list-style-type: none"> <li>• Scenario 3: Sequential construction, where the Morgan Offshore Wind Project: Transmission Assets are constructed first and the Morecambe Offshore Windfarm: Transmission Assets are constructed second</li> <li>• .. with a gap of up to 4 years</li> </ul> <p>This is by far the worst construction scenario resulting in the maximum harm to landowners, farmers, equine users and the local community.</p> <p>The 4 year gap effectively means that the impacted agricultural holdings will be affected for up to 7 years as there is no practical, commercial sense advantage in restarting operations during the gap.</p> <p>In my view this now favoured construction scenario adds to the existing serious criticism of the pre-DCO consultation, and indeed supports the view that it was totally inadequate.</p> <p>This situation proves that the harm caused by this project in its current form is unacceptable and should be rejected.</p> <p>The alternative, what I understand is the "Stanah proposal/option" should now be adopted.</p>	<p>anticipated, however this is the maximum gap that could occur between the projects if the DCO were to be granted with a seven year implementation period.</p> <p>The Applicants acknowledge that the alternative connection point into Stanah has been a key area of focus in this examination. The Applicants provided an initial response on site selection and the assessment of alternatives at section 2.31.1 of The Applicants' Response to Relevant Representations Part 1 - Introduction and thematic responses (PDA-005). Following discussions relating to site selection and alternatives at Issue Specific Hearing 1 and in response to a number of the Examining Authority's Hearing Action Points, the Applicants provided a detailed technical response on these matters including explaining why the proposed alternative connection to Stanah or via an alternative route or Point of Interconnection for the Transmission Assets is not feasible. This was provided at Deadline 1 in Annex 5.2 to the Applicants response to Hearing Action Points: ISH1 6, 8, 9, 19, 26 &amp; 28 - Rev F01 (REP1- 039).</p> <p>National Grid Electricity Transmission have also provided detail as to why a connection at Stanah is not feasible in response to ExQ1 (Q1.2.1 REP3-088).</p>
REP4-157 157.2	<p><b>Item 10 Traffic and transportation</b></p> <p><b>Verbal issues raised by JH Duckworth on behalf of TASC</b></p>	<p>The Applicants note this feedback and would highlight that they will enter into Planning Performance Agreements to cover post consent costs with all relevant Councils. This will reimburse the Council for officer time spent on the Transmission Assets project, for example, involvement in discharge of requirements. These will be negotiated directly with the Councils.</p>

Reference	IP submission	Applicants' response
	<p>Reference: Outline Highway Access Management Plan [REP3-024]</p> <p><b>1. Local Authority Resources</b></p> <p>Throughout this document the applicant states that the Local Highway Authorities will need to be involved in their plan (for example)</p> <ul style="list-style-type: none"> <li>• Example 1.3.3.5 All temporary speed limit restrictions associated with temporary accesses will be implemented by the relevant highways authority following an application by the Applicant(s) or Principal Contractor(s).</li> <li>• the location and design of these signs would be agreed with the relevant highways</li> <li>• Prior to the commencement of the relevant stage of works, the CTMP Co(s) would agree with the highway authorities an appropriate response time to remove any reported detritus / material on the highway following a report.</li> <li>• .... and many others</li> </ul> <p>The Highways authorities are going to have a significantly increased workload from this project. We, as local tax payers, pay for these authorities through our council tax for "steady state" situations, we should not have to pay to support a national infrastructure project <i>that is proceeding in it's current form when there is a much better option</i>. Perhaps the ExA could agree a section 106 agreement (or other mechanism as appropriate) whereby the applicant pays for a significantly increased resource within the Highways Authorities to support the additional significant workload they will impose upon these authorities before, during and post construction.</p> <p>Note: This situation also applies to Planning Authorities where for example detailed planning applications for these accesses will be required. Perhaps similar funding of</p>	



Reference	IP submission	Applicants' response
	authority resources could be provided by the applicant. There may be other authority resources requiring the same arrangement.	
REP4-157 157.3	<p><b>2. With regard to the actual process in the plan itself</b></p> <p>Regarding damage to the highway and/or debris on the highway and/or other obstructions</p> <p>The community wants any problems fixing as soon as possible to minimise the risk of harm to the local community. But the process as described in the document proposes that the applicant will agree damages and financial impact before remediation. This is the wrong sequence - can you imagine how long the argument would take for the applicant to justify and seek agreement on their proportion of liability for each specific item of damage. The remediation may be more time critical than the ability to forge an agreement.</p> <p>Could we request the ExA to ask the applicant to create a more proactive, timely process that gets the problem fixed and the financial agreement to follow later. The local community already have a widely understood and used "Report-It" service which is fully integrated into the management of Highway remediation by LCC Highways.</p> <p>Perhaps the applicant can fund an increase to the authorities' Highways resources for the duration of the project and propose a way of doing this. Please note that this approach was recommended by Mr Stevens from LCC Highways.</p>	<p>The Applicants acknowledge concerns around the condition of any public highway and would assure the community that this has been considered, and is covered throughout the outline Construction Traffic Management Plan Rev 03, Section 1.13.3 (REP4-056). This sets out a framework for managing highway condition and includes a commitment on the Applicants to enter into a legal agreement (likely to be via Section 278 of the Highways Act 1980) with the highway authority to administer and maintain the highway asset to an appropriate standard. It is anticipated this would include intervention timescales for all highway defects which may be attributable to the Transmission Assets construction traffic.</p> <p>The Applicants response above (REP4-157 157.3) confirms the mechanism for reimbursing local authority officer's time via a Planning Performance Agreement.</p> <p>The Applicants recognise concerns relating to debris on the road network and Section 1.7 of the Outline Construction Traffic Management Plan (OCTMP) (REP4-056) includes mitigation measures that there is a risk that vehicles will deposit mud and debris on the highway i.e. in the vicinity of construction site accesses at the onshore substations, wheel cleaning facilities will be provided. The condition of the adjacent highway will be monitored and if mud or debris is found to be present, measures such as road sweeping will be put in place by the Contractors to secure its removal with minimal delay. The requirement to produce detailed CTMP(s) in accordance with the OCTMP and agree this with the relevant highway authority – this is secured by Requirement 9 of Schedules 2A and 2B the draft DCO (REP4-007).</p>
REP4-157 157.4	<p><b>3. With regard to the technical plan for the Routes</b></p> <p>Last year the applicant performed and documented a Fylde coast traffic study. They separated the roads network into over 100 links, a link being a stretch of road between junctions. This comprehensive plan included an assessment of the sensitivity of each link to the use by the proposed HGV movements.</p>	<p>A full reasoning and justification for the selection of the onshore infrastructure, including the range of criteria used and developed throughout the iterative process is provided in Section 4.9 of Volume 1, Chapter 4: Site Selection and Consideration of Alternatives (AS-026). This is also supported by Volume 1, Annex 4.3: Selection and Refinement of the Onshore Infrastructure (AS-028).</p> <p>The Applicants have undertaken a comprehensive data collection exercise including capturing baseline traffic flows, speeds, identification of sensitive receptors and</p>

Reference	IP submission	Applicants' response
	<p>We assume this information subsequently was used to inform the applicant in their choice of routes as evidenced by the diagram in Appendix A page 40 of document Outline Construction Traffic Management Plan [REP2-016].</p> <p>But the choice of routes must have also been informed by other criteria, what were these? When the choice of routes to a particular construction access point have the same sensitivity in the above study, how was the choice made?</p> <p>For local people with a deep knowledge of the area the choice of routes to the substations and cable route areas are understandable, except for 2 of the routes.</p> <p>We would request that the ExA ask the applicant to explain the reasoning behind the choice of two of the routes</p> <p>The yellow route through Wrea Green to Bryning Lane Links 43&amp;45&amp;46 chosen for access to A34/35 Bryning Lane rather than southern link 47 from A584. (Both of the links had the same sensitivity)</p> <p>The green route Link 41 along Ballam Road to the cluster of access points at the junction of Ballam and Peel Roads rather than the shorter Link 30 route direct from M55 J4 at Blackpool, which uses a much shorter distance on lower classification roads. (Both of the links had the same sensitivity)</p>	<p>collisions for all highway links within Blackpool Council, Lancashire County Council and National Highways administration areas. In total, data for 91 highway links have been collected covering over 155km of highway network.</p> <p>The data collection exercise has informed the access strategy which seeks to reduce the requirement for construction traffic to travel via local road and instead aims to prioritise the use of motorways and A and B roads (in line with the functional road hierarchy) for the movement of construction traffic where possible. To facilitate this strategy the Applicants have made a commitment to the use of a temporary haul roads as set out in (CoT 24 of Volume 1, Annex 5.3: Commitments Register of the ES, Rev F05 (REP4-018) and secured by Requirement 9 of the draft Development Consent Order (REP4-007), thereby reducing the requirement for construction traffic to travel via the local road network and avoiding sensitive communities.</p> <p>Where local access is required, route selection has been informed by potential changes in baseline conditions (magnitude of impact), impacted sensitive receptors and highway user groups, road geometry, road safety considerations and the significance of effect following the application of mitigation. The summary of this assessment can be found in F3.7 Volume 3, Chapter 7: Traffic and transport Table 7.43.(APP-108).</p> <p>With the application of embedded and secondary measures mitigation to control construction routes and access, the hours of construction traffic movement and restrict movement on sensitive routes, the assessment concludes that the residual effects would not be significant in Environmental Impact Assessment (EIA) terms. The outline Construction Traffic Management Plan – Rev F03 (REP4-056) contains full details of access route mitigation.</p> <p>With regard to the specific links mentioned, the rationale for choice is as follows:</p> <p>Bryning Lane: The Applicants acknowledge the route via the local road network along Bryning Lane from the A584 from the south (Link 47) is shorter than from the A583 to the north (Links 43a, 43b and 46). However, it is important to not only consider distance but also the extent of any sensitive links impacted. In this regard, the A584 to the south (Link 50) is also assessed to be of high sensitivity. Consequently, the distance over which traffic would travel via links of high sensitivity to reach the accesses on Bryning Lane when approaching from the south is longer than the approach from the north.</p> <p>Peel Road/Ballam Road: The Applicants acknowledge the route via the local road network along Peel Road from the A583 is shorter than via Ballam Road, albeit the</p>



Reference	IP submission	Applicants' response
		total distance travelled is longer (as vehicles would travel further along the A583 to reach Peel Road as opposed to Ballam Road). Whilst this route would provide a shorter route via the local road network, the existing junction of Peel Road and Ballam Road was identified as a constraint as it does not currently allow HGVs to turn from Peel Road to access the accesses on Ballam Road without being in conflict with oncoming traffic (i.e. a HGV must use both lanes to complete turns).
REP4-157 157.5	<p><b>4. Design of Access Points exiting/entering a highway</b></p> <p>Document reference "Outline Highway Access Management Plan" [REP3-024]</p> <p>Another situation is that the applicant has planned on the basis that the speed limit at each access point will remain unchanged. This would seem to us to be a missed opportunity to mitigate risk, particularly when very large vehicles are frequently entering and exiting the access points. Perhaps the ExA could ask the applicant to review the speed limits at each access point and review whether or not they should request a lowering of the limit at these points. We are particularly concerned regarding the A583 access points at A01, A50, A52, A53. Specifically, the A01 access which is off the A583 at a point where it is possibly one of the last 4 lane highways without a central reservation in the country – surely such roads are already a risk prior to any additional HGV traffic.</p> <p>Thank you for your attention.</p>	<p>The Applicants refer to the outline Highway Access Management Plan - Rev F03, Table 1.1 (REP4-060) which sets out the basis for access design. Visibility splays have been designed to comply with current UK highway safety standards based on either a measured speeds or posted speed limits. This ensures that the accesses will operate safely in accordance with the baseline highway conditions without the requirement for enforcement.</p> <p>Where it is not possible to achieve the requisite safety standards, additional traffic management is introduced and in some cases a speed reduction is proposed to ensure the access can operate safely. Section 1.4.4 of the outline Highway Access Management Plan confirms all access designs will be subject to an independent road safety audit as part of the technical approval process.</p> <p>With regard to the specific junctions mention on the A583, Table 1.1 confirms:</p> <ul style="list-style-type: none"> <li>• A1 does not require HGV access;</li> <li>• A50, A52, A53 all have standard compliant designs based on measured speeds.</li> </ul>

## 2.14 John Lillie

**Table 2.15: REP4-158 – John Lillie**

Reference	IP submission	Applicants' response
REP4-158 158.1	<p>Easy we don't want it</p> <p>Not economical</p> <p>Won't put anything in to make electric cheaper</p>	The Applicants thank Mr Lillie for the submissions note the concerns raised within this response.

Reference	IP submission	Applicants' response
	<p>To much wind shutdown</p> <p>To little wind shutdown</p> <p>Turbines only have a short life span</p> <p>Lubricant to run them very very expensive</p> <p>No no no we don't want a wind farm that at most will give 1% to National grid overall</p>	

## 2.15 Karen Leeming

**Table 2.16: REP4-159 – Karen Leeming**

Reference	IP submission	Applicants' response
REP4-159 159.1	<p>I attended the Issue Specific Hearings 2 and 3 and the Compulsory Acquisition Hearing held on 29th, 30th, 31st July and 1st August, either in person or online.</p> <p>The following are my comments in respect of these:-</p> <p>1. The applicants have proposed some changes to the projects in relation to Blackpool Airport, Leach Lane and the Blackpool Road North Playing Fields. Yet again the applicants' provided plans were of poor quality with no road names which made it difficult for local residents to understand how these changes would affect them. This is another example of the applicants' disregard for providing clear information that can be understood by members of the public who may be affected by the project. It was pleasing to note that the inspectors pressed the applicants on the reasons for the change and have since requested further information from the applicants and asked them to provide more detailed information to interested parties.</p>	<p>The Applicants welcome Ms Leeming's feedback following attendance at the Issue Specific Hearings 2 and 3, and the Compulsory Acquisition Hearing.</p> <p>The Applicants note the comment with regards plans with no road names and would refer Ms Leeming to the Change Request Report (CR1-005). This contains plans as well as detailed descriptions and the rationale for the proposed changes to aid consultees better understanding of the proposals.</p>
REP4-159 159.2	<p>2. In relation to the proposed substations between Newton and Freckleton, the applicants have again stated that they are unable to provide renderings of the substations, stating that these will only be available at the design stage (once</p>	<p>The Applicants recognise the concerns in relation to the potential for landscape and visual impacts. As set out in previous submissions by the Applicants, a robust assessment of potential impacts was presented in Volume 3, Chapter 10: Landscape and Visual Resources (APP-123) has been undertaken in accordance with</p>

Reference	IP submission	Applicants' response
	<p>the projects have been approved). The images shown at the Hearings were inadequate and I felt did not give a true representation of what can be expected. We still have no idea of the visual impact.</p>	<p>recognised best practice and industry-standard guidance, specifically the Guidelines for Landscape and Visual Impact Assessment, Third Edition (GLVIA3). The Applicants therefore maintain that Volume 3, Chapter 10: Landscape and Visual Resources (APP-123) provides a proportionate and robust assessment of likely significant effects, supported by representative viewpoints and visualisations, which were agreed with the relevant planning authorities and statutory consultees prior to the Examination of the Transmission Assets. The Applicants had not previously shared rendered images of the proposed substations prior to the appointment of the technical design partner, as this could have been misleading and misrepresentative of the final design. The technical design partner will be responsible post-consent for refining layouts, informing design development and ensuring alignment with the approved outline design secured in the DCO, in collaboration with the local planning authority who will be responsible for the discharge of relevant requirements.</p> <p>The Applicants highlight that 18 visualisations were submitted, as part of the DCO Application in September 2024, in support of Volume 3 Chapter 10 Landscape and visual resources (APP-123) in Volume 3, Figures - Part 6 of 7 (APP-136). The submitted visualisations have been prepared in accordance with best practices and guidance, representing the Maximum Design Scenario. The Applicants reaffirms that their purpose is to illustrate the likely scale and proportions of the Transmission Assets at both Year 1 and Year 15, in summer and winter conditions, in support of the LVIA, providing an established and widely accepted technique for understanding changes in views and visual amenity.</p> <p>The Applicant acknowledges, for complete transparency, that the original visualisations were resubmitted at Deadline 3 (see REP3-015), in which the Applicants corrected some labelling and presentation of photomontages. No changes were made to the visual representation of each substation's parameters or indicative 3D models depicted in each view.</p> <p>Furthermore, in response to the Examining Authority's First Written Question 13.1.4 (REP3-056), the Applicants submitted at Deadline 3 an <i>indicative</i> 3D illustration of each onshore substation site layout, annotated to show typical structures, equipment and buildings. This aligns with the project description in the EIA and the authorised development defined in the dDCO and mirrors the design used for the photomontages.</p> <p>Finally, the Applicants acknowledge that visualisations have inherent limitations, as recognised in the Landscape Institute's Technical Guidance Note 06/19: Visual Representation of Development Proposals (2019). Photographs and graphics are</p>

Reference	IP submission	Applicants' response
		<p>illustrative tools that do not fully replicate human perception and must be interpreted alongside fieldwork observations, which inform the LVIA's conclusions. These limitations are set out in Section A.1.5 of Volume 3, Annex 10.4: LVIA Methodology (APP-127), in accordance with best practices. In this context, comments suggesting that "...trees are shown taller than the 30-metre lightning masts..." and that this constitutes "...an unrealistic portrayal that risks misinforming both public and planning officials..." do not acknowledge the documented limitations of the visualisations. The Applicants consider that this identified disparity is a result of <i>depth perspective</i>, whereby the existing trees, being substantively closer to the viewpoint location, and may appear taller than the lightning mast to which the IP submission appears to refer to.</p> <p>On this basis, the Applicants consider that the submitted documentation provides an adequate and proportionate evidence base to understand and assess the likely significant landscape and visual effects of the proposed development and identify the appropriate mitigation measures which are required.</p> <p>The Applicants will continue to keep the community informed as the design of the Transmission Assets progresses.</p>
REP4-159 159.3	3. There is a lack of agreement between BaE Systems and M & M with regard to bird movements / bird strikes. Being a resident of Freckleton and living very close to the runway this is of particular concern, especially as the village has already experienced one air disaster which still resonates within the village community.	<p>The Applicants note Ms Leeming's response regarding bird strike and aviation risk. The Applicants take safety very seriously and recognise the concerns in relation to aviation. The Applicants are continuing to engage with Blackpool Airport and BAE Systems in relation to this, and are progressing positive discussions to ensure that appropriate mitigation can be secured. The Applicants have previously responded to this matter further to BAE Systems Warton comment within The Applicants' Response to Relevant Representations Part 1 - Introduction and thematic responses (PDA-005), (please see paragraphs 2.21.2.4 to 2.21.2.7) and provided further detail in their Deadline 1 Cover letter (REP1-001). In particular the Applicants have responded to issues around birdstrike in their response to Issue Specific Hearing 1 Action Point 40, in the Applicants' response to Hearing Action Points due at Deadline 1 (REP-037). Further detail on the site selection for the mitigation and biodiversity benefit areas was submitted at Deadline 2 (REP2-046).</p> <p>The Applicants confirmed at Issue Specific Hearing 1 that engagement with BAE is ongoing in order to agree a strategy for a bird strike management plan (see paragraphs 60 - 64 of The Applicants' Hearing Summary of Issue Specific Hearing 1 – Day 2 (REP1- 035)). The Applicants also provided responses in relation to this</p>

Reference	IP submission	Applicants' response
		<p>matter at ISH1_40 of The Applicants' response to Hearing Action Points at Deadline 1 (REP1-037) and provided further detail in relation to engagement with both BAE and Blackpool Airport in the Deadline 1 Cover letter (REP1-001). At Deadline 2, the Applicants have submitted the Strategy for Wildlife Hazard Management Plan (REP2-047) which has been shared with BAE and Blackpool Airport as part of the Applicants ongoing engagement with those bodies as explained in the Applicants responses to Blackpool Airport and BAE written representations in The Applicants Responses to Written Representations from Statutory Consultees and other organisations (REP2-031). At Deadline 3 the Applicants subsequently submitted the Outline Wildlife Hazard Management Plan (REP3-065).</p> <p>The Applicants do not consider that the projects will increase or alter the risk posed by bird strike to aircraft operating out of Warton Aerodrome/Blackpool Airport or that the projects will create an increased risk to public safety.</p> <p>It is the Applicants' position that the existing Bird Strike Risk Assessments that are currently in place at Warton Aerodrome and Blackpool Airport (as per the requirements of CAP 772 Wildlife hazard management at aerodromes/airports) would be updated to ensure that, in the unlikely event there would be any changes in bird strike risk as a consequence of the Transmission Assets mitigation, the existing technical mitigation solutions remain appropriate.</p> <p>An outline Wildlife Hazard Management Plan was submitted at Deadline 3 (REP3-065), as explained within the Strategy for Wildlife Hazard Management Plan (REP2-047) submitted at Deadline 2.</p> <p>The approach to production of an outline Wildlife Hazard Management Plan has been agreed with Blackpool Airport and the Applicants are in the process of discussing updates with the airport, as communicated at Issue Specific Hearing 2.</p>
REP4-159 159.4	<p>4. During the Compulsory Acquisition Hearing the farmers and their agents made very strong cases in respect of the lack of engagement by the applicants, together with lack of detail on construction, especially regarding the placement of link boxes. I attended the Accompanied Site Inspection on 26th June and was shocked at the sizes of the proposed substations as pegged out and the effect this would have on the farms and land between Newton and Freckleton.</p>	<p>Consultation with the community and our stakeholders has been an imperative part of the application process, and the Applicants have sought to prioritise positive engagement and accounting for feedback received throughout the process. The Applicants have responded to concerns in relation to consultation in Section 2.2.2 of their Response to Relevant Representations Part 1 – Introduction and thematic responses (PDA-005), noting in particular that the Examining Authority have confirmed the Applicants have complied with all statutory obligations in relation to consultation. In addition to the statutory consultation requirements, which the Examining Authority has confirmed were complied with, the Applicants undertook</p>

Reference	IP submission	Applicants' response
		<p>prior non-statutory engagement, to ensure that the local community was engaged from an early stage in order that feedback could be considered.</p> <p>A number of these non-statutory consultations, alongside statutory consultations in accordance with the Planning Act 2008 were held in the vicinity of the proposed Transmission Assets, including online events, exhibitions and pop-up events between November and December 2022, April and June 2023, and October and December 2023. These events were advertised in local newspapers, on local radio, on posters in the local area, through postcards and newsletters distributed through the local area and on social media. Further details can be found in the Consultation Report (APP-170).</p> <p>The Applicants remain committed to engaging with stakeholders to understand areas of concern, considering potential mitigation measures, and keeping the community informed as the project progresses,</p> <p>The Applicants also acknowledge Ms Leeming's concerns around the size and location of each project's substation buildings. The Applicants have assessed potential adverse impacts through their environmental impact assessment reported through the relevant chapters of the Environmental Statement (ES). The ES identifies appropriate mitigation measures to minimise those impacts, which are secured through the Requirements set out in Schedules 2A and 2B of the draft DCO (REP4-007). For example, the Applicants note that the substations are subject to a number of controls including Requirements 4 (substation works), 5(1) (Detailed design parameters onshore), 15 (Fencing and other means of enclosure), 17 (Control of operational artificial light emissions), 18 (Control of noise during operational stage) and 20 (Operational drainage management plan) of Schedules 2A and 2B of the draft DCO (REP4-007). Further, they are also subject to measures contained within the outline Code of Construction Practice (REP4- 026), outline Ecological Management Plan (REP4-058) and the outline Landscape Management Plan (REP4-054) pursuant to Requirements 6, 7, 8 and 10 of Schedules 2A and 2B of the draft DCO (REP4-007).</p> <p>The Applicants provided a comparison of the size of the onshore substations against the size of onshore substations which form part of other offshore wind farms infrastructure, this can be found in Annex 5.5 to the Applicants response to Hearing Action Points ISH1 20 Comparable Onshore Substation Platform Footprints (REP1-042).</p>



Reference	IP submission	Applicants' response
REP4-159 159.5	5. Another concern is the possible separation of the two projects, where the applicants made reference to 2 cable corridors adjacent to each other, and also the impacts on the time frame with a possible 7 year gap between the two projects. It seems clear that these are now two distinctly separate projects and should be treated as such.	<p>The Applicants acknowledge that there are two separate cable corridors, however would emphasise that these have been co-located specifically to ensure that the construction impacts are not unnecessarily spread throughout a wider area of the community and ensures impacts are more localised, to minimise the number of people impacted. In relation to the gap between the construction of the two projects, the Applicants note that this could not be more than four years, if the DCO was to be granted with a seven year implementation period (which is the period within which both projects would need to commence construction). The Applicants explained their approach to construction scenarios and coordination between Morgan OWL and Morecambe OWL at Issue Specific Hearing 1 (see in particular paragraphs 11 - 34 of The Applicants' Hearing Summary of Issue Specific Hearing 1 – Day 2 (REP1-035)). Following the hearings, the Applicants have also provided further clarification regarding how Morgan OWL and Morecambe OWL will continue to work together post consent to deliver the two projects comprised within the Transmission Assets with a view to minimising impacts on local communities wherever practicable. This is set out in Section 7 of Annex 5.2 to the Applicants response to Hearing Action Points: ISH1 6, 8, 9, 19, 26 &amp; 28 - Rev F01 (REP1-039).</p> <p>The Applicants are committed to reducing impacts wherever possible and have now proposed to establish a Construction Coordination Working Group post-consent, which would involve specific engagement with the local planning authorities, to facilitate the exploration of opportunities and measures for coordination where possible and practicable between the projects in order to minimise impacts.</p>
REP4-159 159.6	6. We now also have the possibility of a further project Mooir Vannin with yet more disruption across the Fylde for an additional number of years.	The Applicants acknowledge that there is additional development within the area (and assumes the reference here is to the East Irish Sea Transmission Project specifically, which forms part of the Mooir Vannin offshore windfarm). The Applicants would note that this application is being developed separately to the Transmission Assets by a different developer, which will be subject to its own application and examination process. This is therefore outside of the control of the Applicants.
REP4-159 159.7	7. Given my above concerns, I remain strongly opposed to the project, particularly in relation to the fact that the applicant has failed to explore the alternative option at The Hillhouse Technology Local Enterprise Zone.	The Applicants provided an initial response on site selection and the assessment of alternatives at section 2.31.1 of The Applicants' Response to Relevant Representations Part 1 - Introduction and thematic responses (PDA-005). Following discussions relating to site selection and alternatives at Issue Specific Hearing 1 and in response to a number of the Examining Authority's Hearing Action Points, the Applicants provided a detailed technical response on these matters including explaining why the proposed alternative connection to Stanah or via an alternative

Reference	IP submission	Applicants' response
		<p>route or Point of Interconnection for the Transmission Assets is not feasible. This was provided at Deadline 1 in Annex 5.2 to the Applicants response to Hearing Action Points: ISH1 6, 8, 9, 19, 26 &amp; 28 - Rev F01 (REP1-039).</p> <p>National Grid Electricity Transmission have also subsequently provided detail as to why a connection at the Hillhouse Technology Local Enterprise Zone is not feasible in response to ExQ1 (Q1.2.1 REP3-088).</p>
REP4-159 159.8	<p>8. Yet again the Hearings highlighted the general lack of engagement by the applicants with local residents and stakeholders. The information provided was unclear from the outset at the public consultations and does not appear to have improved since.</p> <p>I look forward to the next Open Floor Hearings where I envisage many more members of the public will register to have their say.</p>	<p>The Applicants have responded to concerns in relation to consultation in Section 2.2.2 of their Response to Relevant Representations Part 1 – Introduction and thematic responses (PDA-005), noting in particular that the Examining Authority have confirmed the Applicants have complied with all statutory obligations in relation to consultation. In addition to the statutory consultation requirements, the Applicants undertook prior non-statutory engagement, to ensure that the local community was engaged from an early stage in order that feedback could be considered.</p> <p>A number of these non-statutory consultations, alongside statutory consultations in accordance with the Planning Act 2008 were held in the vicinity of the proposed Transmission Assets, including online events, exhibitions and pop-up events between November and December 2022, April and June 2023, and October and December 2023. These events were advertised in local newspapers, on local radio, on posters in the local area, through postcards and newsletters distributed through the local area and on social media. Further details can be found in the Consultation Report (APP-170).</p> <p>The Applicants remain committed to engaging with stakeholders and keeping the community informed as the project progresses.</p>

## 2.16 Linda Ball

**Table 2.17: REP4-161 – Linda Ball**

Reference	IP submission	Applicants' response
REP4-161 161.1	<p>I have realised that Morecambe and Morgan will not be working together on this project., this is actually 2 separate projects. This means that the work isn't going to happen at the same time and therefore the construction work could take much longer than we were initially led to believe. All this</p>	<p>The Applicants thank Ms Ball for the submissions. The Applicants explained their approach to construction scenarios and coordination between Morgan OWL and Morecambe OWL at Issue Specific Hearing 1 (see in particular paragraphs 11 - 34 of The Applicants' Hearing Summary of Issue Specific Hearing 1 – Day 2 (REP1-035)). Following the hearings, the Applicants have also provided further clarification</p>

Reference	IP submission	Applicants' response
	<p>goes to show that the consultation period was woefully inadequate. It is also worrying; what would happen if one of these companies should get into difficulties and close?</p>	<p>regarding how Morgan OWL and Morecambe OWL will continue to work together post consent to deliver the two projects comprised within the Transmission Assets with a view to minimising impacts on local communities wherever practicable. The Applicants fully recognise the need and benefits for co-ordination and collaboration during the construction phase of the project. Therefore, they have provided further detail in the plans listed below regarding the adoption of a construction working group.</p> <ul style="list-style-type: none"> <li>• Outline Code of Construction Practice (Document Ref J1/F04)</li> <li>• Outline Construction Traffic Management Plan (Document Ref J5/F04)</li> <li>• Outline Ecological Management Plan (Document Ref J6/F05)</li> <li>• Outline Landscape Management Plan (Document Ref J2/F04)</li> <li>• Outline Written Scheme of Investigation (REP4-062).</li> </ul> <p>In addition, Requirement 25 in Schedules 2A and 2B of the draft DCO (REP4-007) ensures coordination and cooperation between the two projects, which includes that each project remains updated and aware of what the other project is doing and reviews the others management plans.</p> <p>The Applicants are committed to reducing impacts wherever possible and have now proposed to establish a Construction Coordination Working Group post-consent, which would involve specific engagement with the local planning authorities, to facilitate the exploration of opportunities and measures for coordination where possible and practicable between the projects in order to minimise impacts. With regards to the concerns around funding, the Applicants would first highlight that the Funding Statement (REP4-011) confirms the financial position of each Morgan and Morecambe. It clearly sets out that the Applicants have sufficient resources to fund their respective projects. The Applicants would further highlight that there are controls within the draft Development Consent Order (REP4-007) that deal with the financial position of each Morgan and Morecambe. Article 33 prevents Morgan and Morecambe from exercising a number of powers prior to it putting into place a guarantee or security equal to its potential liability to compensation payable under the Order, which is approved by the Secretary of State. Alternatively, they must each provide proof that they have sufficient funding to meet any such liability. The Secretary of State must therefore be comfortable that the company would not risk entering financial difficulties.</p>

Reference	IP submission	Applicants' response
REP4-161 161.2	The issue of Quakers Wood was rather skimmed over at the hearings. This is actually an important part of Freckleton's history and is important to the village, after all we are the result of our history.	<p>The Applicants wish to emphasise that although this was not discussed in great detail during the hearings, the potential impacts on Quakers Wood have been carefully considered by the Applicants as part of the assessment process. As outlined in the Project Description (REP2-008), the Applicants have had due regard to the sensitivity of Quakers Wood and are committed to trenchless technique installation in this location to ensure no surface disturbance to habitats or burial ground disruptions occur in the area around Quaker's Wood. The final depth of the trenchless technique beneath Quaker's Wood will be determined at the detailed design stage, post consent, and will be significantly deeper than the woodland and the burial ground.</p> <p>The matter of heritage and archaeology is discussed in the Applicants' Response to Relevant Representations Part 1 - Introduction and thematic responses (PDA-005) at Section 2.18. The Applicants are committed to respecting the heritage of the local area and Requirement 11 of Schedules 2A and 2B of the draft DCO (REP4-007) requires that detailed Onshore and Intertidal Written Schemes of Investigation will be implemented by the Applicants as approved by Lancashire County Council in consultation with Historic England, as appropriate. Further, any archaeological works must be carried out by a suitably qualified and competent person or body previously notified to the relevant planning authority.</p>
REP4-161 161.3	The use of land that has been designated as Green Belt is disturbing. Why should our land, that Bill Bryson called a beautiful garden, be destroyed for these projects when it seems that they aren't really going to save us money anyway.? Our green spaces, our beautiful green land should be protected for our future generations. The wildlife too should be protected, it is important to the conservation of our land and waterways.	The Applicants recognise the concerns here and appreciate the importance of protecting the environment, therefore would emphasise that the presence of green belt land was given due consideration throughout the site selection process. A Green Belt Technical Note was submitted at Deadline 4 (REP4-092) which explores this issue in greater detail. The Applicants have had regard to this throughout the process of refining the proposals and have committed to implementation of numerous mitigation measures to minimise the impacts on the green belt land and surrounding environment.
REP4-161 161.4	The village has been the site of a major aviation disaster and the fact that Bae Systems are not happy with the information that has been provided by the applicants, is very concerning.	The Applicants take safety very seriously and recognise the concerns in relation to aviation. The Applicants are continuing to engage with Blackpool Airport and BAE Systems in relation to this, and are progressing positive discussions to ensure that appropriate mitigation can be secured. The Applicants have previously responded to this matter relating to BAE Systems Warton comment within document The Applicants' Response to Relevant Representations Part 1 - Introduction and thematic responses (PDA-005), please see paragraphs 2.21.2.4 to 2.21.2.7 and provided further detail in their Deadline 1 Cover letter (REP1-001). In particular the Applicants

Reference	IP submission	Applicants' response
		<p>have responded to issues around birdstrike in their response to Issue Specific Hearing 1 Action Point 40, in the Applicants' response to Hearing Action Points due at Deadline 1 (REP-037). Further detail on the site selection for the mitigation and biodiversity benefit areas was submitted at Deadline 2 (REP2-046).</p> <p>The Applicants confirmed at Issue Specific Hearing 1 that engagement with BAE is ongoing in order to agree a strategy for a bird strike management plan (see paragraphs 60 - 64 of The Applicants' Hearing Summary of Issue Specific Hearing 1 – Day 2 (REP1- 035)). The Applicants also provided responses in relation to this matter at ISH1_40 of The Applicants' response to Hearing Action Points at Deadline 1 (REP1-037) and provided further detail in relation to engagement with both BAE and Blackpool Airport in the Deadline 1 Cover letter (REP1-001). At Deadline 2, the Applicants have submitted the Strategy for Wildlife Hazard Management Plan (REP2-047) which has been shared with BAE and Blackpool Airport as part of the Applicants ongoing engagement with those bodies as explained in the Applicants responses to Blackpool Airport and BAE written representations in The Applicants Responses to Written Representations from Statutory Consultees and other organisations (REP2-031). At Deadline 3 the Applicants subsequently submitted the Outline Wildlife Hazard Management Plan (REP3-065).</p> <p>The Applicants do not consider that the projects will increase or alter the risk posed by bird strike to aircraft operating out of Warton Aerodrome/Blackpool Airport or that the projects will create an increased risk to public safety.</p> <p>It is the Applicants' position that the existing Bird Strike Risk Assessments that are currently in place at Warton Aerodrome and Blackpool Airport (as per the requirements of CAP 772 Wildlife hazard management at aerodromes/airports) would be updated to ensure that, in the unlikely event there would be any changes in bird strike risk as a consequence of the Transmission Assets mitigation, the existing technical mitigation solutions remain appropriate.</p> <p>An outline Wildlife Hazard Management Plan was submitted at Deadline 3 (REP3-065), as explained within the Strategy for Wildlife Hazard Management Plan (REP2-047) submitted at Deadline 2.</p> <p>The approach to production of an outline Wildlife Hazard Management Plan has been agreed with Blackpool Airport and the Applicants are in the process of discussing updates with the airport, as communicated at Issue Specific Hearing 2.</p>

Reference	IP submission	Applicants' response
REP4-161 161.5	Farmers are important to our food self sufficiency and yet our farmers are to be majorly affected by the project under examination. Indeed may not be able to recover from the disruption. Is it known how cattle and horses may be affected by electromagnetic emissions from underground cables.? So much of our land will be affected.	The Applicants recognise the significant importance of food security and ensuring that agricultural businesses can continue to operate notwithstanding the development of the Transmission Assets. With regard to potential EMF impacts, the Transmission Assets will adopt the International Commission on Non-ionizing Radiation Protection (ICNIRP) guidelines and Government voluntary Code of Practice on EMF public exposure. Such considerations are inherent to the detailed engineering considerations of cable specification and routing. Relevant public EMF exposure guideline limits are noted in NPS EN-5 and would be complied with by the Transmission Assets as detailed in CoT106 of Volume 1, Annex 5.3: Commitments register of the ES (document reference APP-037)). These guidelines are long standing and have a high safety margin. The levels of exposure that they require would not pose a risk to public health. Volume 1, Annex 5.1 of the Environmental Statement (ES) (document reference APP-035) has had regard to the risk perceptions associated with EMFs of the Transmission Assets on the local area and this is presented in section 1.11.9 of the Annex. Please refer to the EMF Compliance Statement for further information (Volume 1 Annex 3.4 of the ES, (document reference APP-029). The applicants continue to engage with affected landowners and farmers, negotiating terms for the acquisition of the rights required and discussing potential accommodation works to mitigate the temporary impacts on farming operations along with appropriate compensation for business losses incurred during the execution of the works. The Applicants have also provided further detail regarding their approach to construction of the Transmission Assets in the Agricultural Holdings Indicative Mitigation Plan (REP4-111) submitted at Deadline 4.

## 2.17 Lynda Goupil

**Table 2.18: REP4-162 – Lynda Goupil**

Reference	IP submission	Applicants' response
REP4-162 162.1	Dear Sir/Madam, having attended last week's presentations at FC Fylde, which raised more issues, I now find there are more reasons to object regarding the proposed infrastructure relating to the M&M offshore wind farm.	The Applicants are sorry to hear Ms Goupil did not receive a copy of the letter issued by post to nearby residents (and businesses) in proximity to the changes. The Applicants would like to refer Ms Goupil to Annexes A.12 and A.13 of the Change Request Consultation Report Annexes document (S_MMCR_22.1) for more information.



Reference	IP submission	Applicants' response
	<p>Your Project outlined some of the problems with local/national businesses etc, and recent changes, one of which actually affects me &amp;, of which, I was totally unaware. This was the intention of the Project to move a site access on Leach Lane, St Annes. I live on Leach Lane and was totally unaware of this change &amp; have received no notification. Even now, neither myself nor other residents have received notifications as to where this new access is moving from or to. No one seems to know where it was to have been. I think most assumed it would be the back entrance to the airport &amp; this change now leads me to think it is possibly to be the recently expanded entrance to what was an old Brownies hut, which was enlarged to accommodate access for exploratory work, a year or so ago, due to this being a part of the airport signposted for a recently planned Solar Farm. Knowing how this project has worked I last night contacted a friend who lives almost opposite this area, and has received notifications in the past which I haven't, so basically your project restricts who it informs certain information to, limiting the number of residents who may have grounds to object. My friend informs me even she has not received any notification even though she could be greatly impacted if it is to be moved here? So it appears most locals have not got a clue where this new entrance on Leach Lane is to be, so unlikely again to object! As this is a recent change &amp; locals are unaware/not been informed, surely this Closure date should be extended to give locals the opportunity to voice any concerns? This is another example of how badly this project is being run! and possibly why you're receiving little opposition because people are not being informed.</p>	<p>The extent of consultation was discussed with Blackpool Borough Council, Lancashire County Council and Fylde Borough Council and the extent of consultation was deemed proportionate to the reach of the proposed changes.</p> <p>The Applicants conducted a targeted non-statutory consultation for a period of 32 days, starting from Monday 11 August to 5pm Friday 12 September 2025 and note the consultation exceeded the minimum 28-day consultation period recommended in the PINS Change Request Advice under Step 3.</p> <p>Whilst the Applicants made this change request at the earliest opportunity, they must ensure there is sufficient time remaining to accommodate the Change Request within the existing Examination timetable. Therefore, the Applicants will not be extending the period for the Change Request consultation, although highlight that, if the Change Request is accepted by the Examining Authority, there remains time within the Examination timetable for further representations to be made on the Application as changed in line with the Examining Authority's advice included in their response to the initial Notification of the Change Request (PD-010).</p> <p>The Change Request Report was one of many documents provided by the Applicants in support of the Change Request consultation. The full suite of materials prepared for the consultation, including plans and the formal notice, is presented in section 3.6 of the Change Request Consultation Report (document reference S_MMCR_22). These materials were produced using plain English and, where appropriate, made use of images and graphics to facilitate understanding, in particular to show the before and after position in relation to each change. The materials for the Change Request were produced in accordance with the PINS Change Request Advice.</p> <p>The Applicants would like to assure Ms Goupil that consideration for consultees with protected characteristics was given and the Applicants had regard to equal opportunities and diversity throughout the Change Request consultation. As noted in the formal notice (please see Annex A.1), consultees could request the information in bespoke formats. Additionally, the full suite of materials to support the Change Request were available to view digitally at publicly accessible venues (see section 3.4 of the Change Request Consultation Report (document reference S_MMCR_22).</p> <p>As presented in the formal notice and in both postal correspondence and emails sent to consultees, a summary of the changes and the consultation period (including the deadline for responses) was clearly stated (see Annexes A10, A.11 and A.12</p>

Reference	IP submission	Applicants' response
		<p>(document reference S_MMCR_22.1)). The correspondence also provided contact details for the Applicants' team and encouraged consultees to contact the Applicants with any questions they may have regarding the Change Request. The Applicants can confirm no such request was received by Ms Goupil.</p> <p>The Applicants note that Ms Goupil submitted feedback to the non-statutory consultation on the 12 September 2025 and would like to thank Ms Goupil for taking the time to submit feedback. The Applicants have provided a response to each of the points raised and is presented in Change Request Consultation Feedback Response (document reference S_MMCR_22.2).</p>
REP4-162 162.2	<p>I also learned at last week's event via BAE at Warton how dangerous a Bird Strike can be at an airport &amp; BAE advised they were unable to sign off on this phenomenon &amp; would find it difficult to ever do so due to their inability to predict birds' breeding patterns. I do not see how BAE will ever be able to overcome/sign off on this situation, risking life &amp; limb if they do.</p>	<p>The Applicants note Ms Goupil's concerns regarding bird strike.</p> <p>The Applicants take safety very seriously and recognise the concerns in relation to aviation. The Applicants are continuing to engage with Blackpool Airport and BAE Systems in relation to this and are progressing positive discussions to ensure that appropriate mitigation can be secured. The Applicants have previously responded to this matter relating to BAE Systems Warton comment within document The Applicants' Response to Relevant Representations Part 1 - Introduction and thematic responses (PDA-005), please see paragraphs 2.21.2.4 to 2.21.2.7 and provided further detail in their Deadline 1 Cover letter (REP1-001). In particular the Applicants have responded to issues around birdstrike in their response to Issue Specific Hearing 1 Action Point 40, in the Applicants' response to Hearing Action Points due at Deadline 1 (REP-037). Further detail on the site selection for the mitigation and biodiversity benefit areas was submitted at Deadline 2 (REP2-046).</p> <p>The Applicants confirmed at Issue Specific Hearing 1 that engagement with BAE is ongoing in order to agree a strategy for a bird strike management plan (see paragraphs 60 - 64 of The Applicants' Hearing Summary of Issue Specific Hearing 1 – Day 2 (REP1-035)). The Applicants also provided responses in relation to this matter at ISH1_40 of The Applicants' response to Hearing Action Points at Deadline 1 (REP1-037) and provided further detail in relation to engagement with both BAE and Blackpool Airport in the Deadline 1 Cover letter (REP1-001). At Deadline 2, the Applicants have submitted the Strategy for Wildlife Hazard Management Plan (REP2-047) which has been shared with BAE and Blackpool Airport as part of the Applicants ongoing engagement with those bodies as explained in the Applicants responses to Blackpool Airport and BAE written representations in The Applicants Responses to Written Representations from Statutory Consultees and other</p>

Reference	IP submission	Applicants' response
		<p>organisations (REP2-031). At Deadline 3 the Applicants subsequently submitted the Outline Wildlife Hazard Management Plan (REP3-065).</p> <p>The Applicants do not consider that the projects will increase or alter the risk posed by bird strike to aircraft operating out of Warton Aerodrome/Blackpool Airport or that the projects will create an increased risk to public safety.</p> <p>It is the Applicants' position that the existing Bird Strike Risk Assessments that are currently in place at Warton Aerodrome and Blackpool Airport (as per the requirements of CAP 772 Wildlife hazard management at aerodromes/airports) would be updated to ensure that, in the unlikely event there would be any changes in bird strike risk as a consequence of the Transmission Assets mitigation, the existing technical mitigation solutions remain appropriate.</p> <p>An outline Wildlife Hazard Management Plan was submitted at Deadline 3 (REP3-065), as explained within the Strategy for Wildlife Hazard Management Plan (REP2-047) submitted at Deadline 2.</p> <p>The approach to production of an outline Wildlife Hazard Management Plan has been agreed with Blackpool Airport and the Applicants are in the process of discussing updates with the airport, as communicated at Issue Specific Hearing 2.</p>
REP4-162 162.3	<p>Equally shocking was discovering that there is a major pipeline, think it was a CTAP, carrying, again think they said carrying Propane, not sure, but a dangerous gas, this pipeline runs north to south across the Moss at the back of St Annes, &amp; the fact M&amp;M's drilling/tunnelling will be 'hitting' hopefully not, at right angles, running west to east! This was mentioned so briefly that if you'd blinked you would have missed it! This was the first reference I'd heard of this majorly potential disaster! This was literally explosive new information! Just the mere mention that there is the slightest possibility &amp; still being considered as a suitable route just shows how irresponsible this choice of route is!</p>	<p>The Applicants recognise the concern in relation to the interaction between the Transmission Assets and this existing infrastructure. In order to ensure safe and appropriate construction, detailed ground investigations will be undertaken post-consent to inform the final cable route design and construction methodology.</p> <p>As part of the project development the Applicants have engaged with all known and identified statutory undertakers, utility operators and private asset owners. The Applicants have followed an industry best practice approach in identifying these interests that included:</p> <ul style="list-style-type: none"> <li>• a formal utility search procured from Atkins Limited who are an experienced provider in the industry,</li> <li>• full title interrogation of all registered titles within the Red Line Boundary to identify registered charges, easements and other rights of any assets,</li> <li>• issue of Land Interest Questionnaires to all identified interests in any parcel within the order limits requesting confirmation of the data we held and any additional data not previously known or disclosed.</li> </ul>

Reference	IP submission	Applicants' response
		<p>Through this process and following receipt of the composite utility search data from Atkins, the Applicants have mapped all known and identified assets across the order limits within the Onshore Crossing Schedule (REP1-016 and REP1-018). A programme of intrusive site investigations will be undertaken at the locations identified, with results from these investigations used to characterise ground conditions and to undertake a controlled risk assessment that will inform the detailed design on the trenchless technique locations.</p> <p>The detailed design will reflect the complexity of the crossing method and the entry and exit pit locations and the depth of the crossing. Therefore, trenchless technique installations will be designed at sufficient depths to prevent interaction with existing infrastructure – this is in the interest of health and safety, protecting the existing infrastructure and protecting the Transmission Assets. In addition, protective provisions with relevant asset owners, being SABIC UK Petrochemicals Limited in this case, are secured within Schedule 10 of the draft DCO (REP4-007), ensuring the continued safe operation of existing infrastructure throughout construction and operation of the Transmission Assets. An update regarding progress of negotiations of these protective provisions is provided in the SU Negotiation Tracker (S_D3_10/F03), which highlights that the Applicants and SABIC have limited points of discussion remaining and that they are confident these will be agreed before close of examination.</p>
REP4-162 162.4	<p>Something else I hadn't realised the enormity of, until attending last week, was how dangerous, and the quantity, of these large, heavy haulage wagons which are going to be on all our local, often very narrow, single track country lanes and the number of hours per day they will running, 7am-6pm, in theory, it then transpires for 7am read 6am as they're allowed an extra hour?</p> <p>I still don't know where to access all this information &amp; nor do a lot of the local residents I contact, who are going to be affected by all this disruption! I also gathered these heavy haulage wagons will be travelling on a lot of these quiet, backwater, often single track country lanes, where often local cyclists, walkers, joggers, dog walkers, horse riders are regular users! This is, for sure, going to end in tragedy! But it appears M&amp;M put profit before life!</p>	<p>The Applicants recognise the concern in relation to construction traffic on the local road networks, and would emphasise that this has been adequately considered as part of the Environmental Impact Assessment process. The Applicants have committed to the production of detailed Construction Traffic Management Plans (CTMPs). These CTMPs will set out measures to ensure that the numbers of HGV movements are managed and monitored so that the assessed numbers assessed in Volume 3: Chapter 7: Traffic and Transport (APP-108) of the ES are not exceeded. The requirement to produce the detailed CTMP(s) in accordance with the OCTMP is secured by Requirement 9 of Schedules 2A and 2B of the draft DCO (REP4-007).</p> <p>The Applicants are aware of concerns relating to the interaction of cyclists and walkers with construction vehicles and consider that all uses of the road network can be accommodated. Volume 3, Chapter 7: Traffic and Transport (APP-108) of the Environmental Statement assessment has considered the potential impacts of the construction of the Transmission Assets and increases in traffic flows as a result of construction traffic upon non-motorised user delay and fear and intimidation (non-</p>

Reference	IP submission	Applicants' response
		<p>motorised user amenity) for users of the local and strategic road networks. The assessment concludes (with the application of the identified mitigation measures) that the residual effects would not be significant in Environmental Impact Assessment (EIA) terms.</p> <p>The Applicants recognise the significant level of information submitted as part of the Transmission Assets application and remain willing to provide assistance to any individuals who request support.</p>
REP4-162 162.5	With the way the country is heading financially, what happens if the project runs out of money & is cancelled & this major upheaval work is only halfway through? Who will sort this farce out then? Has the project costed for this possible eventuality?	With regards to the concerns around funding, the Applicants would first highlight that the Funding Statement (REP4-011) confirms the financial position of each Morgan and Morecambe. It clearly sets out that they have sufficient resources to fund their respective projects. The Applicants would further highlight that there are controls within the draft Development Consent Order (REP4-007) that deal with the financial position of each Morgan and Morecambe. Article 33 prevents Morgan and Morecambe from exercising a number of powers prior to it putting into place a guarantee or security equal to its potential liability to compensation payable under the Order, which is approved by the Secretary of State. Alternatively, they must each provide proof that they have sufficient funding to meet any such liability. The Secretary of State must therefore be comfortable that the company would not risk entering financial difficulties. This process must be undertaken prior to undergoing key milestones in the Development such as compulsorily acquiring rights, or temporary use of land, which the Applicants would need to exercise prior to beginning construction.
REP4-162 162.6	Finally the Fylde coast consists of very unstable, sandy soil, renowned for flooding, often difficult to get house insurance as a result. I gather the project's intention is to drill underneath the sand dunes, a natural flood barrier! I have mentioned this before, but no one seems to have addressed this point, which seems particularly remiss considering some at last week's event introduced themselves as Ecologists, but failed to mention/address these drilled tunnels breaching the flood defence creating the perfect conduit for the water to enter the Moss, into an already waterlogged area requiring pumping stations on new housing estates onto land which builders have already planned 100s more of new houses, built on concrete bases, already displacing 1000s of	<p>The Applicants note the concerns regarding trenchless cable installation techniques beneath established sand dunes, and potential flooding impacts – this is something which the Applicants have considered at great length as part of refining the design in order to ensure there is no increased flood risk as a result of the Transmission Assets . Please refer to the Applicants response to RR-0417.38 submitted at procedural deadline (PDA-007). This provides considerations on the low to very low risk of flooding and flood risk (including tidal flood risk) as a result of the installation method of the offshore export cable corridor beneath the Lytham St Anne's Dunes SSSI.</p> <p>The Applicants have also submitted an Outline Hydrogeological Risk Assessment of Lytham St Annes Dunes SSSI (REP3-061) at Deadline 3. This assessed the potential risk that construction activities associated with the installation of the offshore export cables beneath the Lytham St Annes Dunes SSSI, Lytham St Annes</p>

Reference	IP submission	Applicants' response
	gallons of water & all these yet to be built. I have not yet heard anyone address this situation.	LNR and St Annes Old Links Golf Course & Blackpool South Rail Line Biological Heritage Site (BHS) may pose to the sand dune features of these sites. The assessment indicates a low risk following potential secondary mitigation options which include placing the export cable within low permeability glacial clays to avoid water tables where present, possible use of shuttered sheet piling to limit groundwater ingress at the entry pits, re-infiltration of abstracted clean groundwater to ground. These potential refinement of options will be developed as part of detailed engineering design, and a detailed hydrogeological risk assessment will be prepared and agreed with the relevant consultees and stakeholders prior to commencement of the works in accordance with CoT128 (Volume 1, Annex 5.3: Commitments Register of the ES (REP4-018)).
REP4-162 162.7	<p>Just one last add on, why when the project supply plans/maps do they not name any of the roads/streets, might help people, but there again, I'm gathering this is the last thing this project wants to do!</p> <p>I'd also like to add, all theses Responses do not give a full picture of the local residents. St annes is mainly populated by elderly people, many into their 70s, 80s &amp; even 90s. This project has totally alienated them and they have had no voice in this exercise. Many live on a small estate at the coal face, so to speak, directly overlooking this drilling site on the airport, most object to this infrastructure, but have no voice as they have no access to the Internet. This is Age discrimination and it isn't just this group of elderly people, they are enclaves all over St Annes and have had absolutely no voice in this whole situation! This needs seriously looking into and rectifying.</p>	<p>The Applicants note the comment on naming roads in plans and recognise the significant level of information submitted as part of the Transmission Assets application.</p> <p>The Applicants remain committed to helping those who request support, and would encourage individuals to contact the Applicants directly by either calling 0800 915 2493 (please select option 3), Alternatively, you write to us by email at <a href="mailto:info@morecambeandmorgan.com">info@morecambeandmorgan.com</a> or post to FREEPOST MORECAMBE AND MORGAN.</p>



## 2.18 Lynn Adele Plant

**Table 2.19: REP4-163 – Lynn Adele Plant**

Reference	IP submission	Applicants' response
REP4-163 163.1	<p>This is my final chance to object to this project. I had asked to speak on 29th July but was not given the opportunity. Quite frankly, this is all a very complicated process for laypeople like myself to navigate and to understand, where and when to comment/speak.</p> <p>I have attended, or viewed via the online links, all of the hearings. I also attended the site visits starting at Margaret Mason's on [redacted] through to the National grid at Penwortham.</p> <p>During this time I have been aware of, to say the least, sloppy, ambiguous and false representations from the applicants and their representatives.</p> <p>The vagueness of the plans is shocking. To discover that the designs of the substations are not yet complete at this late stage, shows a wilful disregard for the public whose lives and livelihoods are about to be decimated.</p> <p>Had the applicants sincerely wanted to demonstrate the will to inform the public with transparency, they would have made a better effort of introducing their plans by widespread, significant and clear advertisements. A small leaflet tucked inside a pile of junk mail, was not adequate. I was not aware of the project at that juncture because that publication, along with the rest of the myriad of junk notifications goes directly from my letterbox to the recycling bin, as is the case in many households.</p> <p>The applicants have repeatedly been asked, by myself and other concerned residents, to supply us with a scaled down model of the substations and sites, but to no avail. It is obvious to me that, had the public been given the opportunity to visualise the scale of the structures, instead being shown dozens of complex maps, the outcry would</p>	<p>The Applicants thank Ms Plant for her submissions and for her attendance at the hearings. The Applicants note the comment on naming roads in plans and recognise the significant level of information submitted as part of the Transmission Assets application. The Applicants remain committed to helping those who request support, and would encourage individuals to contact the Applicants directly by either calling 0800 915 2493 (please select option 3), Alternatively, you write to us by email at <a href="mailto:info@morecambeandmorgan.com">info@morecambeandmorgan.com</a> or post to FREEPOST MORECAMBE AND MORGAN.</p> <p>Consultation with the community and our stakeholders has been an imperative part of the application process. The Applicants have responded to concerns in relation to consultation in Section 2.2.2 of their Response to Relevant Representations Part 1 – Introduction and thematic responses (PDA-005), noting in particular that the Examining Authority have confirmed the Applicants have complied with all statutory obligations in relation to consultation. In addition to the statutory consultation requirements, the Applicants undertook prior non-statutory engagement, to ensure that the local community was engaged from an early stage in order that feedback could be considered. A number of these non-statutory consultations, alongside statutory consultations in accordance with the Planning Act 2008 were held in the vicinity of the proposed Transmission Assets, including online events, exhibitions and pop-up events between November and December 2022, April and June 2023, and October and December 2023. These events were advertised in local newspapers, on local radio, on posters in the local area, through postcards and newsletters distributed through the local area and on social media. Further details can be found in the Consultation Report (APP-170).</p> <p>The Applicants have not produced a scaled-down model of the onshore substations, as visualisations of the onshore substations for the Transmission Assets are available within Volume 3, Figures – Part 6 of 7 (APP-136) which provide appropriate representations of the proposals and a technical note regarding landscape and design matters was submitted at Deadline 3 (REP3-064).</p> <p>In relation to the level of detail shown within the plans provided to date, the Applicants would note that it is standard for some more detailed elements of the</p>

Reference	IP submission	Applicants' response
	<p>have been significantly louder and bigger. I believe the applicants are fully aware of this, hence their reluctance to produce such a model.</p> <p>I only fully understood the size and size impact of these monstrosities when, on the site visit, I walked the length of just one of them on the dairy farm belonging to Mr &amp; Mrs Fare .... and even then, we failed to calculate the depth because the posts, planted to demonstrate that measurement were so far away, and on such a huge decline they were not visible to us at all.</p> <p>In contrast, Mr Coney, the Fare's representative was clear and coherent and spoke in a language we could all understand. He perfectly demonstrated the thoughtlessness and ignorance of the planners, with regard to the Fare's livelihood. What was also abundantly clear was the applicant's representative's was ability to offer a response.</p> <p>This project is ill thought out, devoid of any concern for our green spaces, our greenbelt, our graveyards, our hedgerows, our wildlife, our protected species, our migratory birds, our nesting birds, our children's mental health, our children's education, our children's outdoor activities, our agriculture, our dairy farms, our tourism industry, our rural identity and our heritage .... to name but a few.</p> <p>As the applicants have already commenced work in our fields, I suspect they are confident of getting their projects passed.</p> <p>This, despite the fact that they have been so long in the planning they are almost obsolete, new technologies are overtaking them. This produces a new concern, that the projects will commence, the damage will be done and the projects will be abandoned, similar to huge areas of the HS2 rail link.</p> <p>I pray that this is not a fait accompli.</p>	<p>design to be determined post-consent. The Applicants refer Ms Adele Plant to ISH1_22 of REP1-037 which explains how the Environmental Statement has been carried out in using the Rochdale Envelope approach. This ensures that the Applicants have assessed the worst case scenario and therefore have a full understanding of the implications of onshore environmental impacts.</p>

## 2.19 Mary Barlow

**Table 2.20: REP4-164 – Mary Barlow**

Reference	IP submission	Applicants' response
REP4-164 164.1	<p>To Whom It May Concern,</p> <p>I am writing to formally object to the proposed development of a substation in immediate proximity to our home. The physical location of this industrial infrastructure — directly opposite our property — poses serious, long-term risks to our health, environment, and quality of life. I wish to highlight the following major concerns:</p> <p>1. Health Risks from Electromagnetic Fields (EMFs)</p> <p>Substations generate electromagnetic fields (EMFs), and although levels vary, close proximity to such infrastructure raises serious health concerns — especially for long-term exposure.</p> <p>Numerous studies have raised concerns about increased risks of childhood leukaemia, neurological effects, and other chronic illnesses in those living near high-voltage substations or power lines.</p> <p>The World Health Organisation has classified extremely low-frequency EMFs as "possibly carcinogenic to humans" (Group 2B), based on epidemiological studies.</p> <p>Long-term exposure to EMFs — even at low levels — can cause chronic stress, insomnia, and headaches, and may exacerbate anxiety disorders and cognitive fatigue.</p> <p>Given these concerns, it is wholly inappropriate to site a substation immediately in front of family homes, especially without long-term environmental and public health impact assessments and full resident consultation.</p>	<p>The Applicants note the response and concerns raised from Mrs Barlow and has responded to the individual points raised below.</p> <p>The Applicants have responded to comments on EMF within section 2.1 of The Applicants' Response to Relevant Representations Part 1 - Introduction and thematic responses (PDA-005). The Applicants will adopt the International Commission on Non-ionizing Radiation Protection (ICNIRP) guidelines and Government voluntary Code of Practice on EMF public exposure. Relevant public EMF exposure guideline limits are noted in NPS EN-5 and would be complied with by the Transmission Assets as detailed in CoT106 of Volume 1, Annex 5.3: Commitments register of the ES (REP4-088)). These guidelines are long standing and have a high safety margin. The levels of exposure that they require would not pose a risk to public health.</p>
REP4-164 164.2	<p>2. Mental Health and Wellbeing</p> <p>The psychological toll of living next to a construction site — and then a permanent industrial structure — is already</p>	<p>The Applicants acknowledge Mrs Barlow's concerns regarding mental health, and would emphasise that this is something the Applicants take seriously.</p>

Reference	IP submission	Applicants' response
	<p>taking effect. Both myself and my husband are suffering from heightened anxiety, stress, and sleeplessness. The visual intrusion and looming presence of a substation will irreversibly damage the sense of peace and safety we have worked our entire lives to build.</p> <p>This is not simply about aesthetics; it is about mental health, dignity, and respect for human life.</p>	<p>The Applicants are aware of the concerns raised relating to human health, including mental health, and have addressed these at section 2.19 of The Applicants' Response to Relevant Representations Part 1 - Introduction and thematic responses (PDA-005). This confirms that an assessment of human health (including mental health) is contained in Volume 1 Annex 5.1: Human Health (APP-035) and outlines various measures aimed at ensuring the continued health and wellbeing of the local population and how these are secured through the draft Development Consent Order (REP4-007).</p> <p>The Applicants visited Mrs Barlow (and Mr Barlow, please refer to REP4-148) on the 25 June 2025 with the aim of assisting Mr and Mrs Barlow, in understanding the proposals, answer queries and assist in providing the latest information submitted into the examination of the Transmission Assets project. This was subsequently followed by an email issued on the 9 July 2025 directing Mr and Mrs Barlow to the relevant application documents based on the discussion points raised during the meeting.</p> <p>The Applicants had hoped the meeting of the 25 June would be the first of many meetings with Mr and Mrs Barlow in building a positive working relationship. The Applicants received an email on the 9 July 2025, noting they no longer wish to engage with the Applicants. Whilst the Applicants respect Mr and Mrs Barlow's decision, the Applicants note that they remain committed to engaging with Mr and Mrs Barlow in the future should they change their mind.</p>
REP4-164 164.3	<p>3. Environmental Impact: Noise, Dust, and Disruption</p> <p>The construction and operation of a substation will also cause significant and prolonged environmental disruption, including:</p> <p>Noise pollution from heavy machinery, pile-driving, and transport vehicles</p> <p>Air pollution and dust particles, which can worsen respiratory conditions, especially for the elderly or those with asthma</p> <p>Damage to biodiversity, including local wildlife, plant life, and green spaces, which will be irreversibly affected</p> <p>Construction traffic and congestion, impacting road safety and access in a residential area</p>	<p>The Applicants appreciate the concerns raised in relation to construction impacts and wishes to emphasise that these have all been considered as part of the environmental impact assessment process, with various mitigation measures now proposed in order to ensure that the impacts to residents and the local community are minimised as far as possible. The Applicants acknowledge noise and vibration resulting from the construction of the Projects may lead to adverse impacts and effects, as reported in APP-117. However, with the implementation of mitigation measures to be detailed within the Construction Noise and Vibration Management Plan(s) for the Projects, noise and vibration will be suitably controlled to minimise adverse impacts and effects, which is secured by Requirement 8 of the draft DCO (REP4-007). An updated outline version of the Noise and Vibration Management Plan has been submitted at Deadline 4 (REP4-032) which includes detail on the proposed mitigation measures. Operational noise from the substations will be controlled by Requirement 18 (Control of noise during operational stage) of the DCO</p>

Reference	IP submission	Applicants' response
	<p>There is no acceptable justification for placing such an environmentally damaging development in a peaceful, residential setting. The very concept contradicts current planning policy priorities for environmental sustainability and resident wellbeing.</p>	<p>to ensure that that noise does not exceed the recognised acceptable levels pursuant to the British Standards guidance.</p> <p>The Applicants have committed to the production of detailed Construction Traffic Management Plans (CTMPs). These CTMPs would set out measures to ensure that the numbers of HGV movements are managed and monitored so that the assessed numbers assessed in Volume 3: Chapter 7: Traffic and Transport (APP108) of the ES are not exceeded. The requirement to produce the detailed CTMP(s) in accordance with the OCTMP is secured by Requirement 9 of Schedules 2A and 2B of the draft DCO (REP4-007).</p> <p>The Applicants have previously responded to concerns relating to dust within sections 2.4, 2.9 and 2.24 of The Applicants' Response to Relevant Representations Part 1 - Introduction and thematic responses (PDA-005).</p>
<p>REP4-164 164.4</p>	<p>4. Property Devaluation and Loss of Amenity</p> <p>The presence of a substation will inevitably lead to a sharp decline in property value, impacting not only our financial security but also that of our neighbours. It will compromise our right to peaceful enjoyment of our property, as protected by Article 8 of the Human Rights Act.</p> <p>The aesthetic, acoustic, and psychological intrusion this proposal brings is not compatible with residential life and sets a damaging precedent for future developments.</p>	<p>The Applicants refer to their response to Relevant Representations Part 1 - Introduction and thematic responses (PDA-005) regarding property value.</p> <p>The Applicants recognise the concerns raised however do not envisage any impact on property prices as a result of the Transmission Assets given the nature of the proposed development during the operational phase. In any event, the Transmission Assets will be fully compliant with the compensation code, where diminution in property prices can be demonstrated to have been caused by the Transmission Assets. The code sets out the parameters and evidence needed to substantiate a claim for diminution in value and when this happens. The UK Government has also produced a series of plain English general guides to compulsory purchase and compensation which may be useful: Compulsory purchase and compensation (<a href="http://www.gov.uk">www.gov.uk</a> Guide books 1 and 4 being the most appropriate).</p> <p>The Applicants acknowledge Mrs Barlow's concerns regarding the impact the Transmission Assets may have on her home and surroundings. The Applicants take these concerns seriously and are keen to work with Mrs Barlow and her husband Mr David Barlow to address their concerns as far as possible.</p> <p>As the Applicants have noted in REP4-164.2, the Applicants note they remain committed to engaging with both Mr and Mrs Barlow in the future should they change their mind.</p> <p>In the meantime, we will continue to keep the community informed as the Transmission Assets project progresses and will endeavour to minimise any impacts as much as reasonably possible.</p>

Reference	IP submission	Applicants' response
REP4-164 164.5	<p>5. Inadequate Consultation and Community Impact</p> <p>We believe the consultation process has been inadequate, with limited transparency and little effort made to genuinely engage or listen to residents' concerns. No one has explained why alternative locations were not considered or ruled out — locations that do not border residential homes.</p>	<p>The Applicants have responded to concerns in relation to consultation in Section 2.2.2 of their Response to Relevant Representations Part 1 – Introduction and thematic responses (PDA-005), noting in particular that the Examining Authority have confirmed the Applicants have complied with all statutory obligations in relation to consultation. In addition to the statutory consultation requirements, the Applicants undertook prior non-statutory engagement, to ensure that the local community was engaged from an early stage in order that feedback could be considered. A number of these non-statutory consultations, alongside statutory consultations in accordance with the Planning Act 2008, were held in the vicinity of the proposed Transmission Assets, including online events, exhibitions and pop-up events between November and December 2022, April and June 2023, and October and December 2023. These events were advertised in local newspapers, on local radio, on posters in the local area, through postcards and newsletters distributed through the local area and on social media. Further details can be found in the Consultation Report (APP-170).</p> <p>The Applicants provided an initial response on site selection and the assessment of alternatives at section 2.31.1 of The Applicants' Response to Relevant Representations Part 1 - Introduction and thematic responses (PDA-005). Following discussions relating to site selection and alternatives at Issue Specific Hearing 1 and in response to a number of the Examining Authority's Hearing Action Points, the Applicants provided a detailed technical response on these matters including explaining why the proposed alternative connection to Stanah or via an alternative route or Point of Interconnection for the Transmission Assets is not feasible. This was provided at Deadline 1 in Annex 5.2 to the Applicants response to Hearing Action Points: ISH1 6, 8, 9, 19, 26 &amp; 28 - Rev F01 (REP1-039).</p> <p>National Grid Electricity Transmission have also provided detail as to why a connection at Stanah is not feasible in response to ExQ1 (Q1.2.1 REP3-088).</p> <p>As noted in REP4-164 164.2, whilst Mr and Mrs Barlow have made their position clear on engagement with the Applicants, we remain committed to engaging with Mr and Mrs Barlow in the future should they change their mind.</p>
REP4-164 164.6	<p>In Summary</p> <p>We strongly urge the planning authority and responsible parties to reconsider this location and halt this proposal. There are significant and well-founded concerns relating to:</p> <p>Public health and EMF exposure</p>	<p>The Applicants have responded to the specific points raised by Mrs Barlow above.</p> <p>The Applicants understand that the Transmission Assets is deeply personal for Mr and Mrs Barlow, and our goal has always been to minimise disruption wherever possible and to listen carefully to those most affected.</p>



Reference	IP submission	Applicants' response
	<p>Noise, dust, and environmental damage</p> <p>Mental wellbeing and psychological harm</p> <p>Property devaluation</p> <p>Human rights and community impact</p> <p>This proposal, if allowed to proceed, will cause irreversible harm to our home, our health, and our lives. We respectfully request that this objection be formally recorded, and that a written response is provided addressing the concerns outlined above. We will continue to escalate this through all legal, media, and public platforms available to ensure our voices are heard.</p>	<p>The Applicants are keen to build a positive working relationship with Mr and Mrs Barlow and would reiterate our commitment of working with them in the future.</p>

## 2.20 Rev Stephen Heath

**Table 2.21: REP4-177 – Rev Stephen Heath**

Reference	IP submission	Applicants' response
REP4-177 177.1	<p>Having attended the Specific Hearing 2 on the 29th and 30th July 2025 at Mill Farm, Wesham, I was disappointed to learn that due diligence requirements had not prevented the applicant and Fylde Council from employing noise experts from the same parent company to provide advice causing the agenda item Noise and Vibration not to be considered.</p> <p>I therefore have listed my concerns and observations below.</p> <p>In the outline construction noise and vibration plan Document Reference J1.3 Sep 2024</p> <p>1.1.1.3 The deadline for amendments and clarifications has been pushed back to Deadline 6 which feels very late. Can this not be brought forward or at least an update provided at Deadline 5 which includes some greater safeguards if the project is allowed to proceed? There is a difference between 1.1.3.1. 'The Applicants and any Contractor (and subcontractors) will ensure compliance with relevant</p>	<p>The Applicants thank Mr Heath for the submissions, and recognise the concerns raised. In relation to the employment of noise experts, the Applicants submitted a full statement following Issue Specific Hearing 2 (ISH2) explaining the circumstances arising regarding the noise consultant appointed by Fylde Borough Council. Please refer to Annex 9.4 to Applicants response to Hearing Action Points ISH2 39: Tetra Tech- Conflict of Interest Note - Rev 01 (REP4-112).</p> <p>The Applicants note the concerns and observations raised with regard to the Outline Construction Noise and Vibration Management Plan, an update for which was submitted at Deadline 4 (REP4-033).</p> <p>The purpose of the Outline Construction Noise and Vibration Management Plan(s), which forms an Appendix to the Outline Code of Construction Practice (OCoCP)(REP4-026), is to set out the key noise and vibration management and monitoring procedures that will be adopted during the onshore site preparation works and construction of the Transmission Assets.</p> <p>The principles set out in REP4-033 will be used to develop Detailed Construction Noise and Vibration Management Plan(s) (oCNVMP) following granting of consent</p>

Reference	IP submission	Applicants' response
	legislation, requirements, standards, and best practice relating to construction noise, and the practical application stated in the 12th bullet point of 1.2.11 'Where noise complaints are received, construction noise and vibration monitoring may be undertaken at the relevant receptors to ensure the threshold values are not exceeded and notify the principal contractor if exceedances occur.' Please can we have clarification it will be managed and enforced. Caveats such as 1.4.1.4 "Where reasonably practical." gives contractors an option for justification of non-compliance and diminished the commitment to ensuring.	for the Projects. These plan(s) will set out, in detail, how construction noise and vibration levels from the construction works will be managed. Such detail will include specific mitigation measures identified during the detailed design as being required to manage construction noise and vibration, as well as identifying both locations and durations of monitoring. The Applicants recognise the concerns and wish to emphasise that the plan(s) will be implemented by the Applicants as they are approved by the relevant local planning authorities in consultation with the relevant statutory stakeholders. The obligation to comply with the plans as approved is an outright obligation and this overarching requirement is not in any way caveated as only being where reasonably practical.
REP4-177 177.2	1.2.2.1 page 4 Erection of Physical Barriers. The applicant refers to the possibility of using noise screening but gives no indication or commitment to where this is likely to take place nor the visual impact of such additions. Could consideration be given to identifying the locations and a commitment to consultation with those affected about the visual impact and effectiveness of such measures. Such measures will assist in reducing the fears of those who live and work in close proximity to the proposed route. At what stage will this information be provided?	The Applicants refer to their response to REP4-177.1 above, in which it is confirmed that is to set out the purpose of the oCNVMP is to set out key noise and vibration management and monitoring procedures that will be adopted during the onshore site preparation works and construction of the Transmission Assets.  The details of specific mitigation measures to manage construction noise, such as noise screening, will be identified during detailed design and included in Detailed Construction Noise and Vibration Management Plan(s). These plan(s) will require the approval of the relevant planning authorities. The Applicants would emphasise that any works, including erection of noise barriers which may be required for mitigation purposes, can only occur where this is provided for within the Works Plans (document reference B7).
REP4-177 177.3	1.3.1.3 page 5 The applicant states "piling is expected to take place during the day..." This is a very loose phrase. I would suggest it should be firmed up so that it reads "Piling will only take place in the day" or more acceptable still would be between the hours of 8.00 a.m. and 6.00 p.m.	The Applicants refer to their response to REP4-177.1 above, in which it is confirmed that is to set out the purpose of the oCNVMP is to set out key noise and vibration management and monitoring procedures that will be adopted during the onshore site preparation works and construction of the Transmission Assets.  Specific details of piling activities, including working hours, duration and mitigation will be identified during detailed design and included in Detailed Construction Noise and Vibration Management Plan(s).
REP4-177 177.4	I note that at Section 1.2.2.20 it states BS 5228-1:2009+A1:2014 provides basic information and recommendations for methods of noise control relating to construction and open sites where work activities/operations generate significant noise levels. It includes sections on:	With regard to managing community relations during the construction phase, the Applicants confirm that information on communication with residents on notification of construction works, including out of hours working, will be provided in the Communications Plan(s), an outline of which is provided in the Outline Communications Plan which has been updated at Deadline 5 (Document Reference

Reference	IP submission	Applicants' response
	<p>• community relations; • noise and persons on site; • neighbourhood nuisance; • project supervision; and • the control of noise.'</p> <p>Can I ask what the applicant has completed/is proposing to ensure they are compliant with BS5228 and the need to establish a relationship with local communities? I heard a lot of challenges from the local community but few, if any, endorsements of the applicants chosen route and delivery. The mitigations within the document are extremely generic and suggest the listed mitigations are industry norms but there is nothing that indicates what is specific to this project and its peculiar issues and locations that then justifies the overall conclusion of minor impact.</p>	<p>J1.1/F04) to include specifics relating to sensitive receptors as discussed and agreed through the engagement with the Fylde Borough Council noise and vibration consultant via Statement of Common Ground meetings held on 4<sup>th</sup> and 15<sup>th</sup> September. The plan sets out a framework for engaging stakeholders (i.e. sets out methods of contacting and engaging with affected groups; methods of providing advance notifications); roles and responsibilities for implementing the communication plan; and complaints procedure. Specifically, it includes a commitment in paragraph 1.3.1.1.1 that all necessary parties, including local residents, will be informed when construction works will take place, including those to be undertaken out of hours. Information provided will include general location of the activities, and their expected duration. The outline Communications Plan also includes a commitment to regular meeting with a local liaison committee, comprising relevant local representatives to effectively communicate upcoming activities and to establish the most appropriate timescale and the best way to disseminate this information to the community; drop-in sessions; and the appointment of a Community Liaison Officer to be the point of contact for residents and local businesses, and be responsible for implementing the relevant parts of the Communications Plan.</p> <p>Detailed Communication Plan(s), which will be developed from the Outline Communication Plan (Document Reference J1.1/F04) and, which forms part of the CoCP(s). The detailed CoCP(s) are secured by Requirement 8 of Schedules 2A and 2B of the draft DCO (REP4-007). As with the Detailed Construction Noise and Vibration Plan(s), detailed Communication Plan(s) will be implemented by the Applicants as approved by the relevant local planning authorities in consultation with the relevant statutory stakeholders, as appropriate.</p> <p>With regard to detailed mitigation, the Applicants refer to the responses to REP4-177.1 and REP4-177.2 above, which confirm that detailed mitigation measures will be identified during detailed design and included with the Detailed CNVMP which will be agreed by relevant local planning authorities.</p>
REP4-177 177.5	<p>It is a further concern that 1.2.1.1 General noise and vibration management page 4 indicates at bullet point 8 "The appointment of a site contact to whom complaints/queries about construction activity can be directed - any complaints should be investigated, and action taken where appropriate." There is no commitment about time frames for following</p>	<p>The Applicants refer to the response to REP4-177.1 above, in which it is confirmed that the purpose of the oCNVMP is to set out key noise and vibration management and monitoring procedures that will be adopted during the onshore site preparation works and construction of the Transmission Assets.</p> <p>Specific details of how complaints relating to construction activities will be dealt with will be developed during detailed design and included in Detailed Construction Noise and Vibration Management Plan(s), and this will need to be approved by the relevant</p>

Reference	IP submission	Applicants' response
	through the complaint investigation and raises questions about the objectivity/independence of the of the process.	<p>local planning authority. The Applicants response to ExQ2:14.1.3 (document reference S_D5_5) outlines the complaints procedure that will be informed by best practice guidance, including the Association of Noise Consultants 'Construction Noise - A good practice guide to the preparation, submission and management of Section 61 consents - Technical Note' (March 2021). These procedures will include the following:</p> <ol style="list-style-type: none"> <li>1. Chain of command for complaints received</li> <li>2. Response times to initial complaints.</li> <li>3. Recording of complaints and details (e.g. name, address, contact phone number, date and time of complaint, method of notification, type of complaint, details of complaint, summary of any previous or related complaints</li> <li>4. Investigation of complaints and any resulting actions (e.g. mitigation measures, monitoring, modified work practices)</li> <li>5. Method of keeping complainant informed of progress of resolving complaint.</li> <li>6. Process for escalation should complainant not be satisfied on outcome of investigation.</li> <li>7. Any regular reporting of complaints received to relevant local authority</li> </ol>
REP4-177 177.6	I note that the Construction Noise and Vibration Assessment Clarification Note S_D3_11(July 2025) acknowledges in their qualitative assessment, 1.3.1.3 that there will be high, medium and low impacts which are greater than the impacts reported in APP117 with more properties affected if there is concurrent construction. It was unfortunate that the Hearing was unable to hear from Fylde Council as to their concerns as, like so many other issues, the applicant appears very comfortable that such details are delayed until the close or even beyond the close of the evaluation period.	<p>The Applicants disagree that the details relating to noise and vibration impacts of the Projects are being delayed from being examined. All documentation provided throughout the examination process is available to all consultees and stakeholders and the Applicants have welcome comments and feedback from FBC on these matters. The Applicants understand that the Council now has support from their preferred noise and vibration consultant with the appropriate safeguards now in place. The Applicants held a Statement of Common Ground meeting with the Fylde Borough Council noise and vibration consultant on Thursday 4<sup>th</sup> September, with a follow-up SoCG meeting on Monday 15<sup>th</sup> September with the discussions reflected in the updated SoCG with FBC submitted at Deadline 5 (Document Ref S_D1_6.3/F02). The Applicants and FBC made significant progress relating to noise and vibration matters, reflected in the questions and responses appended to the SoCG.</p> <p>The Applicants also confirm that the updated construction noise impacts submitted in its Construction Noise and Vibration Assessment Clarification Note (REP3-068),</p>

Reference	IP submission	Applicants' response
		<p>submitted at Deadline 3, were specific to transient works including site preparation, haul road construction/removal and trenching. These impacts were derived using a quantitative assessment, using the same approach reported in the ES, as described in paragraphs 1.2.1.3 and 1.2.1.4. The note acknowledges that greater numbers of properties being identified as likely to be impacted by such works when compared to those reported in APP-117, but due to their transient nature, such works would not result in significant adverse effects.</p>
<p>REP4-177 177.7</p>	<p>Given the Hearing heard that there is no detail on design of the substations, no agreement with LCC Highways regarding roads to be used, haul routes or access routes, how can we be confident that this approach is accurate and mitigations will be effective. It is my view that there are serious gaps in planning that should be identified in the evaluation process, especially considering that Outline Construction Noise and Vibration Monitoring Plan J1.3 section 1.5.1.1 indicates that monitoring is the responsibility of the principal contractor.</p>	<p>The Applicants acknowledge concerns around the detail of each project's substation. Details of the onshore substations are provided in the Landscape and Design Matters Technical Note (REP3-064), including indicative layouts that informed the visualisations contained within Volume 3, Figures – Part 6 of 7 of the Environmental Statement (REP3-015). The outline Design Principles (currently in discussion with local authorities) also sets out the principles of the design of the onshore substations. An updated version has been submitted at Deadline 5 (Document Ref J3/F02).</p> <p>The Applicants note that the substations are subject to a number of controls including Requirements 4 (substation works), 5(1) (Detailed design parameters onshore), 15 (Fencing and other means of enclosure), 17 (Control of operational artificial light emissions), 18 (Control of noise during operational stage) and 20 (Operational drainage management plan) of Schedules 2A and 2B of the draft DCO (REP4-007). Further, they are also subject to measures contained within the outline Code of Construction Practice (REP4-026), outline Ecological Management Plan (REP4-058) and the outline Landscape Management Plan (REP4-054) pursuant to Requirements 6, 7, 8 and 10 of Schedules 2A and 2B of the draft DCO (REP4-007).</p> <p>The Applicants refer Rev Heath to ISH1_22 of REP1-037 which explains how the application has been carried out in using the Rochdale Envelope approach. This ensures that the Applicants have assessed the worst case scenario and therefore have a full understanding of the implications of onshore environmental impacts. The Applicants can clarify that that whilst monitoring is the responsibility of the principal contractor, as identified in the outline Construction Noise and Vibration Management Plan (REP4-032), Section 1.2.2 states that the Applicants are responsible for ensuring that the Construction Noise and Vibration Management Plan is implemented effectively by the principal contractors. Therefore, the overall responsibility for ensuring compliance with the commitments and requirements of the draft DCO remains the responsibility of the Applicants.</p>

Reference	IP submission	Applicants' response
		<p>With regard to agreements with LCC highways, the Applicants would note that prior to the submission of the Development Consent Order (DCO) application, extensive work was undertaken to produce individual bespoke outline designs for all accesses and crossings. Following submission of the DCO application, the Applicants have progressed minor updates to these designs to address comments received from LCC. These updated outline designs are contained within the latest revision of the outline Highway Access Management Plan (REP4-061). The Applicants consider that all of LCCs access comments have been addressed and note LCCs confirmation that they do not consider that there will be any accesses that will remain unacceptable (REP3-084).</p> <p>With regard to routes to the accesses, following the submission of the DCO application, LCC as the local highway authority have raised comments regarding the suitability of a small number of the proposed routes to accommodate the two-way movement of heavy vehicle (HV) traffic (approximately 15 of 115 highways links that form the traffic and transport study area). Through dialog with LCC the number of links has subsequently reduced from 15 to 12.</p> <p>LCCs comments on these 12 routes can broadly be categorised as concerns regarding geometry leading to potential conflict with traffic and or non-motorised users (either due to highway width or effective width as a result of on street parking). The Applicants recognise these concerns and have included a suite of mitigation measures within the outline Construction Traffic Management Plan (oCTMP) (REP4-056). It is the Applicants position that these measures are appropriate and industry proved (across multiple DCO projects for offshore windfarms and other linear projects) and can be developed into detailed link specific mitigation strategies as part of the final CTMP in agreement with LCC. The commitment to producing a final CTMP is secured by requirement 9 of the draft DCO (REP4-007).</p> <p>There remain ongoing points of discussion with LCC in regard to the suitability and deliverability of the measures in the oCTMP (REP4-007). Whilst the Applicants would assert that LCCs comments relate to matters of detail (that are better addressed as part of the final CTMP) the Applicants continue to work to provide assurances to LCC.</p>
REP4-177 177.8	In choosing this route the applicant is, in my opinion, introducing unwanted and unjustified noise pollution into the area. This, linked with the disruption to travel around the area, will increase the stress and strains of daily living,	The Applicants recognise the concerns raised by the local community and has sought to address concerns wherever possible throughout the design refinement process. A robust assessment of the potential environmental impacts has been



Reference	IP submission	Applicants' response
	<p>degrade the rural areas, disrupt travel for many years with no perceivable short term or long-term benefits to the areas affected.</p> <p>These are long term projects. Disruption and noise has already started to impact on people's wellbeing and we know projects of this size and complexity rarely progress as planned. The report indicates that the numbers of receptors are large. Other routes are available which would have less impact on fewer homes and businesses and without ruining farms and reducing the capacity of the area for food production for up to 20 years if you include the lead in periods to reduce milking herds and then breed again when land is restored.</p> <p>The constant pushing back of deadlines for key information demonstrates that either the chosen route is more complex than anticipated or the applicant's competency/capacity to deliver it.</p> <p>I am concerned about what I have heard and read on the information provided to date. But of even greater concern is the lack of communication with the community, landowners and their agents and the thousands of people who still are unaware of how this project will negatively impact their lives over the next fifteen years and for some, who continue to live and work in the area, for the remainder of their lives.</p> <p>The approach is one of stealth rather than openness, decision rather than consultation, complexity rather than simplicity. As someone who has worked pastorally in this area for many years I see no engagement with the community only alienation.</p> <p>I would ask that the applicant looks again at its approach as at the moment it is perceived by many as coming to plunder and degrade the area. We need an application that is not a tweaked plan from another project but is site specific, detailed to the Fylde and its wellbeing during and post</p>	<p>undertaken with a wide suite of mitigation measures proposed in order to reduce the potential impacts as far as possible.</p> <p>The Applicants provided an initial response on site selection and the assessment of alternatives at section 2.31.1 of The Applicants' Response to Relevant Representations Part 1 - Introduction and thematic responses (PDA-005). Following discussions relating to site selection and alternatives at Issue Specific Hearing 1 and in response to a number of the Examining Authority's Hearing Action Points, the Applicants provided a detailed technical response on these matters including explaining why the proposed alternative connection to Stanah or via an alternative route or Point of Interconnection for the Transmission Assets is not feasible. This was provided at Deadline 1 in Annex 5.2 to the Applicants response to Hearing Action Points: ISH1 6, 8, 9, 19, 26 &amp; 28 - Rev F01 (REP1- 039).</p> <p>National Grid Electricity Transmission have also provided detail as to why a connection at Stanah is not feasible in response to ExQ1 (Q1.2.1 REP3-088).</p> <p>The Applicants have responded to concerns in relation to Consultation in Section 2.2.2 of their Response to Relevant Representations Part 1 – Introduction and thematic responses (PDA-005), noting in particular that the Examining Authority have confirmed the Applicants have complied with all statutory obligations in relation to consultation. In addition to the statutory consultation requirements, the Applicants undertook prior non-statutory engagement, to ensure that the local community was engaged from an early stage in order that feedback could be considered. A number of these non-statutory consultations, alongside statutory consultations in accordance with the Planning Act 2008 were held in the vicinity of the proposed Transmission Assets, including online events, exhibitions and pop-up events between November and December 2022, April and June 2023, and October and December 2023. These events were advertised in local newspapers, on local radio, on posters in the local area, through postcards and newsletters distributed through the local area and on social media. Further details can be found in the Consultation Report (APP-170).</p>

Reference	IP submission	Applicants' response
	<p>construction. Perhaps that is not achievable or not achievable by Morecambe and Morgan or by this route.</p> <p>In evaluating the application, we must not lose sight of what we are changing and who benefits commerce or community?</p>	

## 2.21 Rosaleen Forsey

**Table 2.22: REP4-171 – Rosaleen Forsey**

Reference	IP submission	Applicants' response
REP4-171 171.1	<p>I would like to start with my comments and observations about how the National Inspectorate have conducted these hearings. Whilst the people who greet us, sign us in and look after 'accessibility' matters like hearing-loops etc have been helpful, the Inspectorate panel members themselves have come across at times as dismissive, inconsistent and increasingly biased in favour of The Applicant. We've witnessed rare, but perfectly understandable, healthy and ordinary emotional reactions like very occasional clapping for example, (eg: following the farmers legal representative Mr Coney's passionate presentation after hearing farmer Anne Mason's story), being silenced. By way of contrast, individuals present on behalf of The Applicant can be seen regularly grinning and laughing amongst themselves in a manner that can only be described as cavalier and disrespectful, whilst Fylde residents are speaking about the serious, and sometimes potentially life threatening impact of all this on them. Another example of this was when the increased potential for birdstrikes were mentioned at the hearing back in April and [redacted] dismissed the individual who raised it for using, 'emotive language', whilst members of her team sniggered beside her. There have been other examples of this kind of unacceptable behaviour throughout the hearings, all of which have gone unchecked.</p>	<p>The Applicants thank Rosaleen Forsey for her representation. We would like to assure Mrs Forsey that the Applicants take all matters raised during examination seriously and consider any representations made with the due respect that all stakeholders deserve.</p> <p>With regard to the SABIC pipeline, the Applicants refer to the latest representation by SABIC (REP4-172) which confirms 'SABIC believes there is a way forward to address this issue'. The Applicants have responded to this representation in full (S_D5_2).</p>

Reference	IP submission	Applicants' response
	<p>During the most recent hearing an attempt was also made by the NI chair to shut down the SABIC representative who was speaking remotely about the extreme danger of carrying out these works close to the ethylene CTAP pipeline, which we're aware, could explode like a bomb if sufficiently aggravated during the project work. Why on earth would such an important cautionary presentation be cut short?!</p> <p>Similarly the jeering following the disgraceful lack of compassion shown by The Applicant's legal representative [redacted] to both Anne Mason and Mr Coney, was again perfectly understandable and did not need to be edited out of the recording, rendering said recording inaccurate. Expecting people to show no emotion when confronted with such stories of atrocious behaviour on the part of The Applicant is inhumane and unfair and it should be noted that this took place during hearings which opened with The Applicant taking a good 45 mins, (while we were told time was tight), to explain why that hadn't done things they had been told and were obligated to do. They were, during that 45 mins, unable to share significant information, provide suitable levels of detail nor answer important and pertinent questions. To turn up to a hearing so ill prepared was incomprehensible and to allow this amount of time to be spent on their excuses, unforgivable. The Applicant's legal representative should have been curtailed by the NI chair after 5 minutes of this. I think the NI reps who make up these hearing panels, particularly those who chair them, need to be much fairer and more balanced and humane when conducting them.</p>	
REP4-171 171.2	<p>Moving on, my second request is that given the number of significant changes and amendments the applicants are making to their original application, the consultation period needs to be extended by at least another 3 months to allow for stakeholders to fully digest the implications, and for further accompanied inspections to take place. I hereby make a</p>	<p>The Applicants would emphasise that the changes made to the proposed development have been considered predominantly as a result of feedback received from stakeholders throughout the process and on the whole these changes are seeking to reduce the land required for the development of the Transmission Assets, and minimise impacts upon the local community. An extension to the consultation period for this change request would require an extension to the Examination period. The Transmission Assets has been accepted into the examination stage Section 98(1) of the Planning Act places the Examining</p>

Reference	IP submission	Applicants' response
	formal request for this and if refused, a comprehensive written explanation as to why.	<p>Authority under a duty to complete the examination of the application within 6 months. The Secretary of State may extend this deadline but historically, that has only happened in exceptional circumstances. It is not unusual for a project to seek changes of this nature to the application during the examination process and the Applicants are confident given the nature of the proposed changes that an extension to the examination process should not be necessary. The changes being proposed as part of the Change Request represent an overall reduction in land-take and impacts, as a result of feedback received from key stakeholders, and so the Applicants do not agree that an extension to consultation period, which would require an extension to the Examination timetable is necessary.</p> <p>The Applicants appreciate that the amount of information submitted into the examination process is considerable, including refinements to the project in response to stakeholder feedback. The Applicants would note that these refinements are typically in relation to reducing the scope of the application (for example removing flexibility or committing to specifics) and that these amendments are agreed with the relevant stakeholder that has requested them throughout the examination process.</p> <p>Regarding site inspections, the number and location of accompanied site visits during the examination it is determined by the Examining Authority. Given the limited scope of the proposed changes and the fact that these overall reduce the scale of the impacts and land take, the Applicants do not consider that additional site inspections are needed.</p> <p>The Applicants note that Ms Forsey submitted two sets of feedback to the non-statutory consultation on the 11 September 2025 related to the Change Request consultation. The Applicants thank Ms Forsey for her engagement, and have provided a response to each of the points raised and this is presented in Change Request Consultation Feedback Response (document reference S_MMCR_22.2).</p>
REP4-171 171.3	I think we are all in agreement that the applicant is attempting to gain permission for a project they themselves do not fully understand. The continued inadequacy of answers being proffered to reasonable questions is as embarrassing as it is disturbing. My third point of concern is therefore, as we've been told that a huge project of this nature, being carried out by two separate companies is unprecedented, it's clear that we, the people of the Fylde are to be little more than guinea	The Applicants note Ms Forsey's concerns, but respectfully disagree with Ms Forsey's comments.

Reference	IP submission	Applicants' response
	<p>pigs. Whilst this is a scandal in itself my further point is that it's reasonable for people to assume that this confusion and lack of experience and detail from The Applicant as a result of this fact will almost certainly spill over into the project itself. It's therefore likely that the project will either collapse and/or run out of funds before it's been completed. Stakeholders therefore need to see a very clear and tangible contingency plan that can be actioned in the event of this happening. Such a plan will similarly be needed if and when there is a change of Government and the project is stopped.</p>	
<p>REP4-171 171.4</p>	<p>I would like to also mention the Equality Impact of this proposed project on the residents of the Fylde. Fylde has an elderly population, (60+), of 26.9% (compared to 18.7% nationally) and as such these proposals would impact disproportionately on a group of people with a protected characteristic under the Equality Act.</p>	<p>The Applicants submitted a Public Sector Equality Duty (PSED) Statement (REP1-058) which confirmed that the Applicants have provided a comprehensive assessment of the potential impacts of the project on "vulnerable groups" within the Human Health Annex (APP-035). Vulnerable groups are defined in section 1.11.5 of APP-035 to include children and young people, older people, low income groups, people with existing poor health including disability, those who share protected characteristics under the Equality Act 2010, and people living in deprivation (including those experiencing income and/or access and geographic vulnerability). The assessment concludes that there would be minor adverse, non-significant effects in EIA terms on vulnerable groups as a result of the construction of the development in relation to the impacts listed at 1.3.3.2(a), (b), (d), (e), (g) and (h) of the PSED Statement (REP1-058).</p> <p>To date the Applicants have reviewed no comments from the public or other stakeholders in relation to the consideration of vulnerable groups within the Human Health Annex. Following discussion on this at the hearings in July, the Applicants will be updating the Equalities Impact Assessment ([REP1-058) at Deadline 6 to bring together any comments received on its assessment and the outcomes of further discussions and engagement with relevant parties such as Wrea Green Equitation Centre and Lytham Town Trust who own Blackpool Road Recreation Ground, managed by Fylde BC.</p> <p>The Applicants are working with those identified sensitive receptors regarding communication and familiarisation plans ahead of construction starting to reduce any perceived impact. Such mitigations being proposed relate to slow start procedures, site specific working hours for start up operations and deliveries along with increased engagement ahead of mobilisation operations.</p>

Reference	IP submission	Applicants' response
REP4-171 171.5	<p>I would, as a retired teacher who initially trained as a Psychiatric Nurse, also like to flag the issue of mental health. Local families are becoming increasingly worried, scared and anxious about the impact of 11/13 years of dust, filth and noise on their children's health, development and wellbeing. It is a key topic of conversation in these parts and of course, the children themselves will and do pick up on this.</p> <p>It doesn't help that Lytham St Anne's Local Nature Reserve and St Anne's Junior Football club and Skatepark will be casualties of this project and that we are to witness our sand dunes being demolished in part and the popular Starr Gate beach closed for 3/5 years. All of these things particularly impact on children.</p> <p>Local parents, carers and teachers along the Fylde have reported local children becoming withdrawn, sleeping badly and experiencing panic attacks as they develop abnormally high levels of agitation and anxiety amidst all of this. With this in mind, we are all aware that in a real life context the timing of these proposals would mean that a local 5 year old child starting school in the Sept of the year this project starts, would be subjected to this terrible environment until they are at least 16 years old ... so that's for the entirety of their remaining childhood. So that's eleven or more years growing up on a noisy, filthy, hazardous building site, watching local wildlife being destroyed around them, worrying about planes falling out of the sky, dodging juggernauts and backed up traffic on the way to school and witnessing heavy machinery trundling up and down the coastal road and along the beach, potentially, 12 hours a day 6.5 days a week.</p> <p>The families in particular whose land, homes and livelihoods are to be impacted by the proposed location of the substations are living in a state of shock and utter bewilderment, that these permanent concrete monstrosities, buzzing morning, noon and night for evermore, can be forced upon them in times where we are simultaneously claiming as a society to passionately value good mental health and hold human rights in high regard</p>	The Applicants note but respectfully disagree with Ms Forsey's comments.



Reference	IP submission	Applicants' response
	<p>- not just in our own country it has to be said, but claiming to be advocates, setting an example to others across the world, in this respect. It would be laughable it wasn't so serious and so terrifying.</p> <p>I want to go on record as someone with a lifetime of mental health expertise who predicted and warned you in August 2025 that should this project go ahead you will likely be responsible for a catastrophic, community wide mental health crisis along the Fylde, as people's lives descend into chaos. I don't have to spell out what the outcomes of such a crisis would be for our most vulnerable and seriously impacted and I sincerely hope that The Applicants have good levels of surplus back up finance for the law suits that will likely follow.</p>	
	<p>If it is not possible to stop this terrible, dangerous and unwanted project, I urge you to reroute these cables through one of the more suitable routes that have been suggested by stakeholders, to also extend the consultation period by at least three months and to carry out a proper Equality Impact Assessment and mental health review in collaboration with local schools, care homes, hospitals and residents groups. I would also like to be assured that there will be a series of full and thorough investigations carried out and subsequent reports shared with all stakeholders relating to how work being conducted close to the CTAP pipeline will be managed from a safety perspective, how the potential for increased bird strikes around Blackpool Airport and Warton Aerodrome will be mitigated, what remedial works will be carried out to prevent flooding around the Starr Gare area as a result of damage to the dunes and the short, medium and long term impact on local roads particularly around Squires Gate, an area which is reported to already experience a disproportionate amount of road traffic accidents. I would also like to know what compensation is to be offered to local residents should The Applicant be successful in their bid to realise this project.</p> <p>Thank you.</p>	<p>The Applicants do not consider it necessary or justified for there to be any extension to the change request consultation process, for the reasons set out in REP4-171.2 above.</p> <p>The examination process has been rigorous and transparent and has provided opportunities for the public and all stakeholders to have their say orally and in writing in accordance with the statutory framework prescribed by the Planning Act 2008.</p>

## 2.22 Susan Nebard

**Table 2.23: REP4-174 – Susan Nebard**

Reference	IP submission	Applicants' response
REP4-174 174.1	<p>Following the last EA hearings at Mill Hall and read the documents/answers to the questions raised by the EA at previous hearings related to these projects I have a number of general and specific points to make.</p> <p>1) first of all I would like to comment that I found the behaviours/attitude of the applicants representatives generally to be dismissive and at times downright rude in respect of the questions/points raised that they don't agree with. I know they have a job to do but it's incredibly frustrating to listen to a group that clearly thinks they are right and have complete disregard for the humans (and animals) whose lives are going to be decimated if these projects go ahead.</p>	<p>The Applicants note and respectfully disagree with Ms Nebard's response. The Applicants have sought to be helpful and respectful at all times during hearings, as have the Examining Authority and Planning Inspectorate team.</p>
REP4-174 174.2	<p>2) I want it to fully recognised that no matter what precedents have been set (in the minds of the applicants) in respect of other similar projects there are NO OTHER PROJECTS OF THIS SCALE ANYWHERE ELSE IN THE WORLD IN SUCH A POPULATED AREA. NO WHERE ELSE. Its not right for do compare to other projects in any way shape or form.</p>	<p>The Applicants respectfully disagree as many similar projects have been assessed, examined, consented and built across the country. The Applicants would also direct Mrs Nebard to The Crown Estate's Offshore Wind Map which clearly shows that other consented projects of a scale equal to or greater than the Transmission Assets are in operation around the UK: <a href="https://www.thecrownestate.co.uk/our-business/marine/offshore-wind/offshore-wind-map">https://www.thecrownestate.co.uk/our-business/marine/offshore-wind/offshore-wind-map</a></p> <p>The Applicants would also reassure Mrs Nebard that the Transmission Assets Order Limits have been designed to avoid populated areas and that the Transmission Assets will not pass under any homes or settlements,</p>
REP4-174 174.3	<p>3) I find it astounding that the applicants can provide so little detail at this stage and believe that this is acceptable. Having no detailed designs for the substations is just dishonest and disrespectful. This project should not be allowed to go ahead until we have visual representations.</p>	<p>The Applicants recognise Ms Nebard's concerns in relation to the potential for landscape and visual impacts from the proposed substations. As set out in previous submissions by the Applicants, Volume 3, Chapter 10: Landscape and Visual Resources (APP-123) provided a robust assessment of potential impacts, and this assessment has been undertaken in accordance with recognised best practice and industry-standard guidance, specifically the Guidelines for Landscape and Visual Impact Assessment, Third Edition (GLVIA3). The Applicants therefore maintain that</p>

Reference	IP submission	Applicants' response
		<p>Volume 3, Chapter 10: Landscape and Visual Resources (APP-123) provides a proportionate and robust assessment of likely significant effects, supported by representative viewpoints and visualisations, which were agreed with the relevant planning authorities and statutory consultees prior to the Examination of the Transmission Assets. The Applicants has not previously shared rendered images of the proposed substations prior to the appointment of the technical design partner, as this could have been misleading and misrepresentative of the final design. The technical design partner who will be responsible post-consent for refining layouts, informing design development and ensuring alignment with the approved outline design secured in the DCO, which will be progressed in collaboration with the local planning authority who will be responsible for the discharge of relevant requirements.</p> <p>The Applicants highlight that 18 visualisations were submitted, as part of the DCO Application in September 2024, in support of Volume 3 Chapter 10 Landscape and visual resources (APP-123) in Volume 3, Figures - Part 6 of 7 (APP-136). The submission visualisations have been prepared in accordance with best practices and guidance, representing the Maximum Design Scenario. The Applicants reaffirms that their purpose is to illustrate the likely scale and proportions of the Transmission Assets at both Year 1 and Year 15, in summer and winter conditions, in support of the LVIA, providing an established and widely accepted technique for understanding changes in views and visual amenity.</p> <p>The Applicant acknowledges, for complete transparency, that the original visualisations were resubmitted at Deadline 3 (see REP3-015), in which the Applicants corrected some labelling and presentation of photomontages. No changes were made to the visual representation of each substation's parameters or indicative 3D models depicted in each view.</p> <p>Furthermore, in response to the Examining Authority's First Written Question 13.1.4 (REP3-056), the Applicants submitted at Deadline 3 an <i>indicative</i> 3D illustration of each onshore substation site layout, annotated to show typical structures, equipment and buildings. This aligns with the project description in the EIA and the authorised development defined in the dDCO and mirrors the design used for the photomontages.</p> <p>Finally, the Applicants acknowledge that visualisations have inherent limitations, as recognised in the Landscape Institute's Technical Guidance Note 06/19: Visual Representation of Development Proposals (2019). Photographs and graphics are illustrative tools that do not fully replicate human perception and must be interpreted alongside fieldwork observations, which inform the LVIA's conclusions. These</p>

Reference	IP submission	Applicants' response
		<p>limitations are set out in Section A.1.5 of Volume 3, Annex 10.4: LVIA Methodology (APP-127), in accordance with best practices. In this context, comments suggesting that "...trees are shown taller than the 30-metre lightning masts..." and that this constitutes "...an unrealistic portrayal that risks misinforming both public and planning officials..." do not acknowledge the documented limitations of the visualisations. The Applicants consider that this identified disparity is a result of <i>depth perspective</i>, whereby the existing trees, being substantively closer to the viewpoint location, and may appear taller than the lightning mast to which the IP submission appears to refer to.</p> <p>On this basis, the Applicants consider that the submitted documentation provides an adequate and proportionate evidence base to understand and assess the likely significant landscape and visual effects of the proposed development.</p>
REP4-174 174.4	<p>4) I find it incredibly worrying that Blackpool Airport can hide behind an NDA that includes topics that have an impact on lives such as bird strikes when BAE Systems haven't been given enough information to be satisfied regarding the risk. I would want the EA to pressure Blackpool Airport to disclose how they have satisfied themselves that there is no increased risk to life as a result of change re to bird flight paths/migratory paths once the wind farms have been installed.</p> <p>5) I found the very cosy relationship between Blackpool Council lawyer and the applicants representatives at the last meetings to be very concerning. Blackpool council are there to represent local people and the fact they have signed an NDA and thought it was acceptable to be incredibly friendly with the applicants representing totally distasteful and quite potentially corrupt. I hope the EA saw the same and takes some action.</p>	<p>The Applicants take safety very seriously and recognise the concerns in relation to aviation. The Applicants are continuing to engage with Blackpool Airport and BAE Systems in relation to this, and are progressing positive discussions to ensure that appropriate mitigation can be secured. The Applicants have previously responded to this matter relating to BAE Systems Warton Aerodrome comment within document The Applicants' Response to Relevant Representations Part 1 - Introduction and thematic responses (PDA-005), please see paragraphs 2.21.2.4 to 2.21.2.7 and provided further detail in their Deadline 1 Cover letter (REP1-001). In particular the Applicants have responded to issues around bird strike in their response to Issue Specific Hearing 1 Action Point 40, in the Applicants' response to Hearing Action Points due at Deadline 1 (REP-037). Further detail on the site selection for the mitigation and biodiversity benefit areas was submitted at Deadline 2 (REP2-046).</p> <p>The Applicants confirmed at Issue Specific Hearing 1 that engagement with BAE is ongoing in order to agree a strategy for a bird strike management plan (see paragraphs 60 - 64 of The Applicants' Hearing Summary of Issue Specific Hearing 1 – Day 2 (REP1- 035)). The Applicants also provided responses in relation to this matter at ISH1_40 of The Applicants' response to Hearing Action Points at Deadline 1 (REP1-037) and provided further detail in relation to engagement with both BAE and Blackpool Airport in the Deadline 1 Cover letter (REP1-001). At Deadline 2, the Applicants submitted the Strategy for Wildlife Hazard Management Plan (REP2-047) which has been shared with BAE and Blackpool Airport as part of the Applicants ongoing engagement with those bodies as explained in the Applicants responses to Blackpool Airport and BAE written representations in The Applicants Responses to</p>

Reference	IP submission	Applicants' response
		<p>Written Representations from Statutory Consultees and other organisations (REP2-031). At Deadline 3 the Applicants subsequently submitted the Outline Wildlife Hazard Management Plan (REP3-065).</p> <p>The Applicants have provided a Wildlife Attractants Habitat Risk Assessment as part of the Deadline 5 submission (S_D5_17), based on the process referred to in the CAP 772 and the MAA RA 3270 guidance, and through engagement with Blackpool Airport. The Applicants provided this to BAE and met with BAE on Monday 15<sup>th</sup> September to discuss the conclusions and receive feedback to inform updates in advance of submission at Deadline 5. The Applicants note that the DIO also attended the meeting, providing additional information in respect to their interests. Both BAE and DIO noted that the information provided in the risk assessment (S_D5_17), was the level of detail that they would expect to see and they would be better able to confirm their position on the outcome following full review and review from the DIO's subject matter expert. DIO noted that the proposed management, design commitments and monitoring were aligned to similar measures that have been used for other developments.</p> <p>The Applicants remain confident that with the application of appropriate passive and active mitigation, as outlined in the Wildlife Attractants Habitat Risk Assessment (S_D5_17) appended to the outline Wildlife Hazard Management Plan, that there will be no increase to bird strike risk or that the projects will create an increased risk to public safety. With regard to the M&amp;M employee liaising with Blackpool Council's lawyer, the Applicants are committed to working with our stakeholders and were speaking to Blackpool Borough Council, to seek to resolve concerns wherever possible.</p> <p>The Applicants would clarify that the use of NDAs is standard practice where potential impacts to commercial operations are being discussed between parties. The Applicants have exchanged information with Blackpool Airport over a period of time and this process has culminated in the agreement of the cooperation agreement and the Applicants being able to satisfy Blackpool Airports' concerns.</p> <p>The Applicants refer to their hearing summary (REP4-103, paragraph 155) which confirms that a non-disclosure agreement (NDA) is being negotiated with BAE Systems. This is to facilitate provision of Warton Aerodrome's Wildlife and Habitat Hazard Management Plan, Term Safety Plan and Strike Rate Probability Index to support the Applicants' ongoing workstreams with BAE Systems to demonstrate that</p>

Reference	IP submission	Applicants' response
		<p>bird strike risk will not materialise, and create the opportunity to provide the same level of reassurance as has been reached with Blackpool Airport.</p> <p>With regard to the M&amp;M employee liaising with Blackpool Council's lawyer, the Applicants are committed to working with our stakeholders and were speaking to Blackpool Borough Council, to seek to resolve concerns wherever possible.</p>
REP4-174 174.5	<p>6) I found it ridiculous that the applicants representatives raised concerns about the external legal expert support engaged by one of the authorities in relation to noise and vibration. Their own legal expert was from same company and yet they thought it was approved that they keep their's and the authority seek alternative legal expertise. I didn't see the EA push back on this which was disappointing. Given the importance of this topic I'd expect the timetable for examining this project to be extended so it can be given due attention.</p>	<p>The Applicants refer to REP4-112, which clarified the position regarding Fylde's noise consultant who the Applicants understand is now advising the Council with the necessary safeguards in place.</p>

## 2.23 Trevor Bethell

**Table 2.24: REP4-175 – Trevor Bethell**

Reference	IP submission	Applicants' response
REP4-175 175.1	<p>These comments relate to matters discussed at Issue Specific Hearing 2.</p> <p>For ease of reference I have used the timings taken from the transcripts of the recordings (which are the official record of the hearings) and should be read in that context.</p> <p><i>Issue Specific Hearing 2 - Part 3</i></p> <p><i>Timing References: 00:40:01 to 00:43:26 and 00:51:11 to 00:53:15</i></p> <p>At these points in the hearing the topic of the Sand Lizards was discussed.</p>	<p>The Applicants thank Mr Bethell for the submissions and note this representation. The Applicants wish to emphasise that they are fully aware of the importance of sand lizards and that this has been considered throughout the assessment and application process, with the design refined in such a way as to avoid potential impacts to the species. A sand lizard mitigation plan has been prepared and added as an appendix to the Outline Ecology Management Plan at Deadline 5 (Document Refs J6/F05 and S_D4_14/F02).</p> <p>The Ecology Management Plan is secured by Requirement 12 (Ecological management plan) of the DCO.</p>



Reference	IP submission	Applicants' response
	<p>Sand Lizards have been successfully reintroduced to the Lytham St Annes Sand Dunes Site of Special Scientific Interest and there is now an established population.</p> <p>Sand Lizards are considered to be an endangered species in the United Kingdom and are a European Protected Species (EPS), protected under the Conservation of Habitats and Species Regulations 2017.</p> <p>They are a Priority Species under the UK Post-2010 Biodiversity Framework.</p> <p>They are also protected under the Wildlife and Countryside Act 1981 and it is an offence to intentionally or recklessly:</p> <ul style="list-style-type: none"> <li>• disturb them while they occupy a structure or place used for shelter or protection</li> <li>• obstruct access to a place of shelter or protection</li> </ul> <p>The sand lizard is one of the UK's rarest reptiles and favours sandy heathland habitats and sand dunes. Sand lizards are confined to a few sites as destruction of their habitat has reduced their range. Their successful reintroduction to this sensitive natural habitat should be a significant material consideration in the examination of this application.</p> <p>Representations were made concerning the population of Sand Lizards on the Northern slope of the "sand winning" access from Clifton Drive North and to the sensitivity of their habitat and burrows being affected by vibrational disturbance and, arguably, the impact of noise.</p>	
REP4-175 175.2	<p>Timing References: 01:01:12 to 01:02:23 and 01:04:43 to 01:05:13</p> <p>At these points in the hearing the applicants referred to usage of the existing "sand winning" access from Clifton Drive North as being "exactly the same" as the use currently made of the access by Fylde Borough Council.</p>	<p>As outlined in the Project Description (REP2-008), the trenchless cable installation method at landfall involves installing cables to a minimum depth of 10m, ensuring no surface disturbance or habitat disruption occurs within sensitive areas. The commitment to trenchless installation techniques is set out in the CoT44 (Volume 1, Annex 5.3: Commitments Register of the ES (REP4-018)) and is secured by Requirement 8 of Schedules 2A and 2B of the draft Development Consent Order (REP4-007).</p>

Reference	IP submission	Applicants' response
	<p>In response the Council disagreed stating "the intensity of the use by the council is very different to the intensity of use for construction access".</p> <p>As a local resident living in near proximity of this access I can say that I see very little use of it by any party. Access to the track is restricted by a locked gate which is rarely opened and is in any case frequently blocked by cars parked by visitors (both local and others) to the Beach. The sand winning or extraction activities finished years ago, to my knowledge, and I have seen no evidence of traffic movements by HGV or any other commercial vehicles. The Council will no doubt come back with specifics but I would be surprised if their vehicles amount to anything more than the "Golf Cart" type vehicle or the "Toyota Land Cruiser" vehicle type used by the Coastal Rangers. Certainly their use of this access by my own observations is extremely limited.</p> <p>Given the nature of the construction activities planned on the Beach - the construction of the Pipe Exit Points, the building of Cofferdams, the Cable Pulling etc. the types of heavy equipment and vehicles involved and the noise and vibrational impacts of these and the associated activities bear no comparison to the limited low impact use made by the Council.</p> <p>These vehicle movements and associated activities, to say nothing about the proposed underground tunnelling of up to six separate bores for the offshore sub sea marine high voltage cables en route to the Transition Joint Bays at Blackpool Airport, will inevitably create noise and vibration with significant detrimental impact on the endangered species Sand Lizard population and, in my opinion, will "disturb them while they occupy a structure or place used for shelter or protection" an offence under the Wildlife and Countryside Act 1981.</p>	<p>The Applicants have submitted an Outline Hydrogeological Risk Assessment of Lytham St Annes Dunes SSSI (REP3-061) at Deadline 3. This assessed the potential risk that construction activities associated with the installation of the offshore export cables beneath the Lytham St Annes Dunes SSSI, Lytham St Annes LNR and St Annes Old Links Golf Course &amp; Blackpool South Rail Line Biological Heritage Site (BHS) may pose to the sand dune features of these sites. The assessment indicates a low risk following potential secondary mitigation options which include placing the export cable within low permeability glacial clays to avoid water tables where present, possible use of shuttered sheet piling to limit groundwater ingress at the entry pits, re-infiltration of abstracted clean groundwater to ground. These potential refinement of options will be developed as part of detailed engineering design, and a detailed hydrogeological risk assessment will be prepared and agreed with the relevant consultees and stakeholders prior to commencement of the works in accordance with CoT128 (Volume 1, Annex 5.3: Commitments Register of the ES (REP4-018))</p>

Reference	IP submission	Applicants' response
	<p>To add further context to the importance and sensitivity of the Sand Dunes and the SSSI I referred to the:-</p> <p>The St Anne's Neighbourhood Development Plan - Neighbourhood Profile August 2015 (I understand this now forms part of the the Development Plan for Fylde Borough Council - this could be clarified with them if necessary)</p> <p>From this document Chapter 9 - The Natural Environment states:</p> <p>"The Fylde Sand Dunes Management Action Plan (2008) was commissioned by the Fylde Sand Dune Project Steering Group in order to evaluate the importance of the Fylde Sand Dunes and other natural coastal habitats and to suggest management proposals in order to maintain or enhance the key features. Funding for the project was provided by the Local Strategic Partnership (LSP)."</p> <p>It goes on to say:</p> <p>"The main aims for management of the Fylde Sand Dunes are to:</p> <ul style="list-style-type: none"> <li>• enhance the nature conservation interest of the coastal habitats;</li> <li>• improve the efficiency of the dunes and saltmarsh as soft sea-defence (with associated cost savings in maintenance of hard sea-defences); and</li> <li>• enhance public appreciation and enjoyment of the dunes."</li> </ul> <p>It states:</p> <p>"These aims will be addressed under the more specific operational objectives listed below:</p> <ol style="list-style-type: none"> <li>1. Enhance the nature conservation value of the sand dune and other natural coastal habitats, including the shingle bed and accreting saltmarsh.</li> </ol>	

Reference	IP submission	Applicants' response
	<p>2. Increase the area of sand dune and saltmarsh habitats where appropriate, particularly by allowing conditions for natural seaward accretion.</p> <p>3. Maintain and, where appropriate, enhance sea defences, with natural accretion of sand dune and saltmarsh forming the primary defence and repairs to hard defences only undertaken where current or potential soft defence is not adequate.</p> <p>4. Promote knowledge, understanding and appreciation of the ecological value of the sand dunes and other natural coastal habitats, and of their key role in coastal flood defence.</p> <p>5. Enable safe recreational use of the dunes and beach where this does not significantly compromise the nature conservation or flood- defence properties of the dunes and other natural coastal habitats.”</p> <p>It also states:</p> <p>“The Lytham St. Anne’s Dunes include the area of sand dunes at Starr Hills together with land on its seaward side. The sand dunes at Starr Hills have been designated as a Local Nature Reserve since 1968.</p> <p>The sand dunes of the Fylde coast may only be a fragment of a once extensive dunes system but they still provide a habitat for a wealth of wildlife. Over 280 different plant species have been recorded on the dunes from the mobile dunes on the coast to the fixed dunes of the Local Nature Reserve. This includes internationally rare plants such as the Isle of Man cabbage and the Dune Helleborine which only grow in Great Britain.”</p> <p>and to conclude:</p> <p>“The dunes are home to a wide variety of specialist plants and animals which are perfectly adapted to life in sand. Marram grass is known for its long roots and dune stabilisation properties and there are rare plants such as the</p>	

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	<p>Isle of Man Cabbage and Dune Helleborine, as well as a variety of scarce orchids. In the summer butterflies, moths and bees collect nectar from the wildflowers that flourish on the dunes. The dunes are not only important for wildlife, they are also important for the local community."</p> <p>Sand dunes are complex and dynamic systems which must be managed to ensure the health of the system."</p> <p>I cannot see how approving the Development Consent Order for these two highly complex, intrusive and damaging projects can in any way be seen to support the efforts by the local community to restore native reptiles to their natural habitat (the Sand Dunes/SSSI) and to improve and protect this valuable heritage for the current and future generations to come.</p>	
<p>REP4-175 175.3</p>	<p><i>Issue Specific Hearing 2 - Part 6</i> <i>Timing References: 01:22:50 to 01:29:40</i></p> <p><i>Issue Specific Hearing 2 - Part 7</i> <i>Timing References: 00:00:38 to 00:15:29</i></p> <p>The Agenda Item that was to be covered was Noise and Vibration and I share the Examination Authority's concern that this item was not able to be discussed due to a perceived technical conflict of interests between the two separate Noise Consultants instructed by the Applicants and Fylde Borough Council.</p> <p>Given the impact of this Development Consent Order (if it were to be approved) on the local community for these two large scale, highly intrusive and destructive civil engineering projects pushing back open discussion of the Noise and Vibration issues to a further hearing, understood to be on the 6th October 2025, when the Examination is due to conclude on the 29th October 2025, is highly unsatisfactory. I believe it disadvantages the local community and the general public and imposes a very short timescale for any further</p>	<p>The Applicants submitted a full statement following Issue Specific Hearing 2 (ISH2) explaining the circumstances arising regarding the noise consultant appointed by Fylde Borough Council (the Council) (Annex 9.4 to Applicants response to Hearing Action Points ISH2 39: Tetra Tech- Conflict of Interest Note - Rev 01 (REP4-112). The Applicants understand that the Council now has support from their preferred noise and vibration consultant with the appropriate safeguards now in place. The Applicants held a Statement of Common Ground meeting with the Fylde Borough Council noise and vibration consultant on Thursday 4 September, with a follow-up SoCG meeting on Monday 15 September with the discussions reflected in the updated SoCG with FBC submitted at Deadline 5 (Document Ref REP1-049).</p> <p>The Applicants acknowledge noise and vibration resulting from the construction of the Projects may lead to adverse impacts and effects, as reported in APP-117 and can assure Mr Bethell that these issues are not being dismissed or underestimated. With the implementation of mitigation measures to be detailed within the Construction Noise and Vibration Management Plan(s) for the Projects, noise and vibration will be suitably controlled to minimise adverse impacts and effects, which is secured by Requirement 8 of the draft DCO (REP4-007). An updated outline version of the Noise and Vibration Management Plan has been submitted at Deadline 4 (REP4-032). Operational noise from the substations will be controlled by Requirement 18 (Control of noise during operational stage) of the DCO.</p>

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	<p>observations or representations to be made post the hearing date.</p> <p>I believe that it is inevitable that the noise from these construction activities, especially where this is in the vicinity of homes and businesses, will be detrimental to health and well being and could be argued to be a nuisance.</p> <p>I understand that usually for a nuisance to exist it would:</p> <ul style="list-style-type: none"> <li>• unreasonably and substantially interfere with the use or enjoyment of a home or other premises</li> <li>• injure health or be likely to injure health</li> </ul> <p>and under the Environmental Protection Act 1990 S.79 ga Statutory nuisances and inspections therefor be identified as noise that is prejudicial to health or a nuisance and is emitted from or caused by a vehicle, machinery or equipment in a street i.e. a Statutory Nuisance</p> <p>In this case, given the prolonged nature of the construction timescale, and with no commitment to concurrent or consecutive build if both projects were to proceed, there will be inevitable and lengthy impacts on the Health and Wellbeing of the local community through this nuisance (arguably also a defined Statutory Nuisance).</p> <p>Impacts on residents, homes, businesses, health facilities and educational establishments should not be dismissed or under estimated and it is improbable that these can be avoided no matter what Noise Mitigation the applicants propose.</p>	<p>The Applicants have previously addressed concerns relating to human health, including mental health at section 2.19 of The Applicants' Response to Relevant Representations Part 1 - Introduction and thematic responses (PDA-005). This confirms that an assessment of human health (including mental health) is contained in Volume 1 Annex 5.1: Human Health (APP-035) and outlines various measures aimed at ensuring the continued health and wellbeing of the local population and how these are secured through the draft Development Consent Order (REP4-007). The Applicants have also addressed the issue of Statutory Nuisance under Section 79(1) of the Environmental Protection Act 1990 in Section 1.5.2 (Noise and Vibration) of their Statutory Nuisance Statement (APP-237). This confirms that with suitable mitigation measures secured through the DCO no impacts are anticipated that would create a statutory nuisance.</p> <p>The Applicants recognise the concerns raised and would emphasise that these factors have all been considered at length as part of the assessment and application process for the Transmission Assets. The Applicants have proposed a wide range of mitigation measures in order to reduce impacts and will continue to liaise with stakeholders in order to ensure that concerns can be addressed to reduce impacts as far as possible.</p> <p>In relation to overall construction periods, the Applicants have provided consideration of potential construction scenarios and durations in their Rule 9 – ES assessment of Construction Scenarios (AS-070) at Section 1.5. The Applicants further explained their approach to construction scenarios and coordination between Morgan OWL and Morecambe OWL at Issue Specific Hearing 1 (see in particular paragraphs 11 - 34 of The Applicants' Hearing Summary of Issue Specific Hearing 1 – Day 2 (REP1-035)). Following the hearings, the Applicants have also provided further clarification regarding how Morgan OWL and Morecambe OWL will continue to work together post consent to deliver the two projects comprised within the Transmission Assets with a view to minimising impacts on local communities wherever practicable. This is set out in Section 7 of Annex 5.2 to the Applicants response to Hearing Action Points: ISH1 6, 8, 9, 19, 26 &amp; 28 - Rev F01 (REP1-039). The Applicants have also provided further detail regarding their approach to construction of the Transmission Assets in the Agricultural Holdings Indicative Mitigation Plan (REP4-111) submitted at Deadline 4. The Applicants would emphasise that it has not at any point sought to dismiss the potential for impacts, and has ensured a thorough impact assessment, as well as engagement with affected parties, throughout the process in order that</p>



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		<p>appropriate mitigation measures can be delivered and the design refined in such a way that reduces impacts as far as is possible.</p> <p>There is a need for project separation which the Applicants' have set out in Section 8 of document Annex 5.2 to the Applicants response to Hearing Action Points: ISH1 6, 8, 9, 19, 26 &amp; 28 - Rev F01 (REP1-039). In delivering the Transmission Assets greater certainty can be given in the post consent stage where relevant planning authorities and others will be involved in approval of stages of the construction of the Transmission Assets.</p>
<p>REP4-175 175.4</p>	<p>As regards vibration (and noise) I am particularly concerned about the impact of these from the proposed works on the Landfall Area i.e. between the Transition Joint Bays at Blackpool Airport and the Pipe Exit points on St Annes Beach.</p> <p>The applicants propose to bore lengthy underground boreholes for up to 1500 metres from the Transition Joint Bays to the Pipe Exit Points using "trenchless" methodology which is now understood to be the Direct Pipe Method. If both projects proceed there will be six of these lengthy underground boreholes with inevitable noise and vibration impacts. The applicants have given no details of the dimensions of the proposed underground steel pipes which, amongst other issues, will have a direct effect on the size of the boreheads used in the Direct Pipe Method and thus their effects on vibration. Neither can they rule out the effect of these vibrations on neighbouring properties and businesses. The newly built properties on the Persimmon Coastal Dunes estate were constructed on sandy ground and were piled to ensure stability for the known geological conditions at the time of construction. This would never have taken into account the unforeseen lengthy and continuous subterranean vibrations caused through the proposed trenchless digging methods.</p> <p>The applicants have given no reassurance as to their liability for damage or subsidence caused to these properties by their proposed activities. The risk seems to lie entirely with</p>	<p>As outlined in the Project Description (REP2-008), the trenchless method at landfall involves installing cables to a minimum depth of 10m, ensuring no surface disturbance or habitat disruption occurs within sensitive areas. The commitment to trenchless installation techniques is set out in the CoT44 (Volume 1, Annex 5.3: Commitments Register of the ES (REP3-013)) and is secured by Requirement 8 of Schedules 2A and 2B of the draft Development Consent Order (REP4-007).</p> <p>The Applicants acknowledge Mr Bethell's concerns relating to potential adverse effects from the Transmission Assets. The Applicants have undertaken a robust Environmental Impact Assessment to identify potential adverse effects and identify appropriate mitigation for those effects where necessary and appropriate. The Applicants provided information and responses in relation to the potential impacts listed by Mr Bethell in The Applicants' Response to Relevant Representations Part 1 - Introduction and thematic responses (PDA-005). Matters raised in relation to care homes are covered under Section 2.8, as well as matters related to beach access and construction works either side of the care home covered in Annex 5.3 to the Applicants response to Hearing Action Points: ISH1 13, 14, 16, 17(REP1-040).</p>

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	<p>the property owners which surely cannot be acceptable if they, or their contractors, are responsible. Apart from physical damage the impact on Health and Wellbeing through noise and vibration on the residents of this estate, and the residents of the Thursby Care Home, must be taken into account and given due weight in the Examination process.</p> <p>I believe the above representations give further reasons why this application for a Development Consent Order should not be recommended or approved by the Examination Authority.</p>	