
MORGAN AND MORECAMBE OFFSHORE WIND FARMS: TRANSMISSION ASSETS

Annex 2.3 to Applicants' Response to Deadline 4 submissions from Statutory Consultees and other organisation: Lancashire County Council (REP4-136, AS-082)

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Prepared by:

Morgan Offshore Wind Limited,
Morecambe Offshore Windfarm Ltd

Prepared for:

Morgan Offshore Wind Limited,
Morecambe Offshore Windfarm Ltd

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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 ('Morgan OWL') and Morecambe Offshore Windfarm Limited ('Morecambe OWL'), (together, 'the Applicants') have taken the opportunity to review each of the submissions from Interested Parties. This includes Written Representation, post-hearing submissions as well as responses to ExQ1.
- 1.1.1.2 Details of the Applicants' response to Lancashire County Council is set out in this annex.
- 1.1.1.3 The Applicants have numbered the submissions in line with the Planning Inspectorate's document library, with subsequent paragraph number, e.g. REP4-001.1, REP4-001.2, etc.

2 Applicants' Response to IPs' submissions at Deadline 4

2.1 Lancashire County Council

Table 2.1: RPE4-136 – Response to LCC's Deadline 4 submission

Reference	IP submission	Applicants' response
REP4-136 136.1	<p>1. Introduction</p> <p>1.1. The following sets out Lancashire County Council's Deadline 4 submission for the Development Consent Order for the Morecambe Offshore Windfarm Transmission Assets Generation Assets ('the Scheme'). The submission has been made following the Issue Specific Hearings (ISH) of 29th and 30th (ISH2) and 31st July 2025 (ISH3) and includes:</p> <ul style="list-style-type: none">• Post hearing submissions including written submissions of oral cases;• The applicants' revised draft Development Consent Order; and• Updated statements of common ground, including summaries of the principal areas of disagreement.	<p>The Applicants thank Lancashire County Council for their submissions and respond in detail below.</p>
REP4-136 136.2	<p>2. Post Hearing Submissions including Written Submissions of Oral Cases</p> <p><u>Item 2 - Landscape Character, Visual Effects and Green Belt</u></p> <p>2.1. Louise Eccles, Principal Landscape Architect for Lancashire County Council attended ISH2. The County Council's comments on Item 2 are set out in Appendix A to this submission.</p> <p>2.2. The County Council understands that further submissions from the applicants in relation to Landscape and Green Belt are expected shortly and consequently it anticipates making additional comments in due course in relation to any such submissions.</p>	<p>Noted. The Applicants have responded to the comments at Appendix A below.</p>
REP4-136 136.3	<p><u>Item 4 - Onshore Ecology (including Habitats Regulations Assessment (HRA))</u></p>	<p>2.3 - the Applicants note this comment. The Applicants would like to reiterate that BNG is not yet mandatory for Nationally Significant Infrastructure Projects</p>

Reference	IP submission	Applicants' response
	<p>2.3. John Jones, Principal Ecologist at Lancashire County Council attended ISH2. John Jones confirmed his agreement with the comments relating to Biodiversity Net Gain that had been made by Angus Walker for the Parish Councils and Derek Walker for Fylde Borough Council. John Jones also confirmed that the BNG calculations should exclude measures that are required to meet other obligations such as another legal agreement.</p> <p>2.4. Comments were also made with regard to impacts on important habitats including Lancashire's non statutory biological heritage sites and if there is an impact on any of those sites, it will be important to demonstrate what alternatives were investigated and why they were not feasible in order to justify those impacts as being unavoidable.</p> <p>2.5. An issue was also raised in relation to survey data and an absence of such data within parts of the order limits presumably due to access refusals. However, within those areas there may potentially be features that support protected species such as places of shelter that have not been identified through the surveys.</p>	<p>consented under the DCO consenting regime, and as such the BNG assessment undertaken is voluntary. At present there is no guidance in force from DEFRA regarding BNG assessments progressing through the DCO regime, although the Applicants note this is currently undergoing consultation. The approach to BNG was discussed at length at EWG meetings prior to the submission of the application, and it was confirmed at those meetings that only permanent infrastructure would be considered within the calculation (see Section A.3.1 (Meeting Minutes) in Document E5.1 Technical Engagement Plan Appendices Part 1 of 3 (APP-190).</p> <p>The Applicants can confirm that DEFRA's statutory BNG metric calculator was used to calculate the biodiversity net gain for permanent infrastructure within the Onshore Order Limits, and that a 'custom-made' metric was not used. The metric calculator spreadsheet in PDF format was submitted into the examination by the Applicants at Deadline 4 as an appendices to the Biodiversity Benefit Statement (REP4-066), and has been submitted in excel format at Deadline 5 (S_D5_12).</p> <p>The habitat enhancement, creation and management measures proposed at the substations and at Lea Marsh biodiversity benefit area would not be 'downgraded' as a result of meeting any other requirement or obligation. The BNG assessment has made assumptions about the habitat conditions that would be achieved, and long-term management would seek to deliver habitats in this condition over the lifespan of the detailed EMP, whilst also taking into account the necessary management measures required to adequately mitigate the risk of bird strike. However, the delivery of habitats (in the conditions proposed) at these locations and the adequate management of bird strike risk are not mutually exclusive. The habitat management proposed for Lea Marsh fields is comparable to the management of habitats at the onshore substations, which the Applicants consider no material increase or change to birds utilising the area currently, as presented in the draft Wildlife Attractants Risk Assessment submitted at Deadline 5. The Applicants await BAE's and DIOs formal response on this and the proposed management measures to ensure there is not increase in bird strike risk.</p> <p>The comment from Angus Walker for the Parish Councils regarding the project being located within the Liverpool and Amoudnerness Plain NCA is noted;</p>

Reference	IP submission	Applicants' response
		<p>however, the Applicants maintain that their approach to the delivery of biodiversity benefits within the Order Limits meets the objectives of the projects to deliver measurable enhancements within the immediate local area.</p> <p>2.4 - The assessment has identified direct impacts to Freshfield Farm Pond North BHS, Freshfield Farm Pond South BHS, and Mill Brook Valley BHS, for which mitigation/ compensation measures are described in Volume 3 Chapter 3: Onshore ecology and nature conservation (APP-075). In addition, on 04 August 2025, the Applicants issued a 'Summary of Avoidance/ Reduction/ Mitigation Measures Implemented for Biological Heritage Sites' to LCC. This note summarised each of the BHS sites alongside the associated impact(s) and the avoidance/reduction/mitigation measures for each of these. The Applicants are yet to receive comments from LCC on this note.</p> <p>2.5 – The Applicants provided a note confirming the extent of Phase 1 habitat survey coverage across the Order Limits at Deadline 4 (REP4-116). This note was prepared to address concerns raised by stakeholders including LCC with regard to the limitations to surveys caused by issues with land access. The Applicants maintain that the level of survey effort undertaken was sufficient to characterise the baseline environment for the purposes of the ecological impact assessment, and that land access was not a limitation to the undertaking of the assessment. The Applicants can also reiterate that they have committed to undertaking a detailed programme of pre-construction ecology surveys as set out in Table 1.2 of the OEMP (APP-212).</p>
<p>REP4-136</p> <p>136.4</p>	<p><u>Item 6 - Hydrology and Flood Risk</u></p> <p>2.6. Representatives of the Lead Local Flood Authority (LLFA) were unable to attend ISH2 or ISH3. However a written submission on behalf of the LLFA was submitted to the Examining Authority on 28th July 2025, that the Examining Authority has confirmed as being accepted as Deadline 4 submission. For ease the submission is included as Appendix B to this submission.</p> <p>2.7. The LLFA has reviewed the recordings of the hearing sessions and confirms in relation to Item 6 that all relevant points</p>	<p>Noted</p>

Reference	IP submission	Applicants' response
	are adequately covered in its written submission of 28th July 2025, and that it has no further comments to make.	
REP4-136 136.5	<p><u>Item 7 - Land Use and Recreation</u></p> <p>2.8. Julie Neville, Public Rights of Way Officer at Lancashire County Council attending ISH2, provided advice on the procedure for diverting a public right of way. She confirmed that the notice period of a need to divert or temporarily close a public right of way should be eight weeks and that the seven day period mentioned by the applicant would not be sufficient time.</p>	In response to the comment from LCC, the Applicants confirmed, under item 7(e) of the ISH2 Day 2 Hearing Summary (REP4-104) that the detailed PRow management plans will be discharged by LCC, with 10 weeks for discharge of requirements and 7 days' notice to notify of when specifically the diversions will be undertaken, after the requirement has been discharged.
REP4-136 136.6	<p><u>Item 10 - Traffic and transportation</u></p> <p>2.9. Neil Stevens Highway Development Control Manager for Lancashire County Council as Highway Authority attended ISH2. Because of their length and detail further written comments are provided in Appendix C to this submission, which provides an update to Section 8 (Highways Impacts) of the Local Impact Report (REP1-085) by Lancashire County Council (LCC) dated 20th May 2025, including comments on the further information and submissions received by Deadline 3</p>	Noted.
REP4-136 136.7	<p><u>Item 11- Historic Environment</u></p> <p>2.10. Doug Moir (DM), Planning Officer for Lancashire County Council Historic Environment Team attended ISH2.</p> <p>2.11. DM confirmed that the number of excavated trenches is agreed to be 139.</p> <p>2.12. DM confirmed that, after a telephone call at the beginning of the week with the applicant's consultant Mr Rawlings, the maximum number of trenches to be excavated is expected to be in the region of 400-450.</p> <p>2.13. This means that the 139 trenches currently excavated are likely to comprise c.30-35% of the total number that might be excavated. It is not considered to be a sufficient percentage to characterize the nature of the archaeological resource across the whole of the development.</p>	<p>The Applicants note this response and agree with the summary provided. By means of an update with regard to C14 dating, the Applicants note that all environmental samples from the completed trenches have been processed, and a list of samples suitable for scientific dating was issued to the county archaeologist and Historic England for comment with a response received on 17 September 2025. The next step is to undertake the scientific dating of this material which could be undertaken within a couple of months, subject to laboratory availability.</p> <p>The Applicants confirm that no more trial trenching will be undertaken until spring 2026. However, in response to issue specific hearing 2 action point 48, 'S_D4_9.6 Annex 9.6 to Applicants response to Hearing Action Points ISH2 48: Summary of trial trenching approaches in other DCO applications - Rev F01' (REP4-114), the Applicants have provided a document detailing the trial trenching approach of the Transmission Assets against that taken by other DCO projects. It has been concluded that The Transmission Assets has undertaken a</p>

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	<p>2.14. DM raised concerns that the scientific dating of the features identified in the first stage of evaluation had yet to start, and it's importance has either been lost or is not appreciated. Furthermore, assigning a level of significance to what has been found will not be possible until this data is available.</p> <p>2.15. When questioned as to the level of evaluation that might be expected, DM responded that on long linear developments there's no standard but that in Lancashire for other proposed development sites it would be a 4%-5% sample. DM is happy that the suggested total number of trenches 400-450 will in all likelihood be considered adequate. DM had suggested that if the proposed first stage of evaluation had been completed, 222 trenches instead of the 139 which were actually excavated, that number might have been considered sufficient to characterize the archaeological resource across the site.</p>	<p>significant number of trenches when compared to other projects. Therefore, it is considered that the number of trenches completed is proportionate for this stage of development</p>
<p>REP4-136 136.8</p>	<p>2.16. DM went on to make the point that the scientific dating of the features encountered in the evaluation still needed to be undertaken</p> <p>2.17. DM was not willing to characterize the archaeological potential of the proposed development as being low, but rather unknown as the area has yet to be subject to any significant assessment. Works on similar areas had encountered evidence for both prehistoric and Roman activity, and there is still a potential for similar evidence to be found on the current development.</p> <p>2.18. In response to the question as to the risk of such finds, DM responded that the purpose of pre-determination evaluation was to try to de-risk the site, so that any constraints are known early. We are not in this position and suggested a proposed DCO requirement, such as a 4 month reporting period for each stage of work have a potential to cause delay.</p> <p>2.19. Regarding areas of particular concern, DM commented that some areas already identified as having a high potential have not been subject to any archaeological investigation and they therefore remain a concern. The applicant could allay some of</p>	<p>The Applicants note this response and agree with the summary provided. See response to REP4-136.7 above with regard to scientific dating of features encountered.</p> <p>The Applicants welcome LCC agreement that the outline onshore and intertidal WSI is sufficient and that LCC agree that the Transmission Assets would not have an impact upon the Quaker Woods Burial Ground.</p>

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	<p>LCC's concerns if they could provide a timetable for the (archaeological) work and how it will fit within the construction timetable. LCC would prefer to see works undertaken in advance of construction.</p> <p>2.20. In reply to the question concerning the outline written scheme of investigation DM confirmed that the WSI was considered to be satisfactory.</p> <p>2.21. Regarding the Quakers Wood Burial Ground, DM confirmed that he does not consider that the Burial Ground will be impacted by the development, and that the mitigation measures proposed (avoidance & the use of a trenchless construction methodology) combined with the provisions in the WSI are sufficient to deal with any issues that might arise.</p>	
REP4-136 136.9	<p>3. The Applicants' Revised Draft Development Consent Order</p> <p>3.1. Andrew Sierakowski (AS), Consultant Planner, attended the hearing on the 30th July 2025 on behalf of Lancashire County Council. Lancashire County Council has the following comments to make in relation to the applicants' revised draft Development Consent Order.</p>	Noted
REP4-136 136.10	<p>Articles</p> <p><u>Article 2</u></p> <p>3.2. Lancashire County Council welcomes the inclusion of the definition of "stage" as a part of the Project A onshore works identified as a stage in a written scheme approved under requirement 3 of Schedule 2A; and for Project B, as a part of the Project B onshore works identified as a stage in a written scheme approved under requirement 3 of Schedule 2B. However, it remains concerned that there is uncertainty about whether the two projects will be undertaken together or sequentially.</p> <p>3.3. If undertaken sequentially, not only could this significantly extend the construction phase over a period of years, but could,</p>	<p>The Applicants have previously set out their position on the need for flexibility with regard to progressing with either concurrent or sequential construction within REP1-039 and has continued to emphasise the need for this throughout the examination process.</p> <p>In relation to LCC's concern that sequential construction could result in uncertainty around restoration of the land, the Applicants would emphasise that for majority of the cable route (with the exception of the landfall area at the beach, and the works at Blackpool Airport, which are shared work areas), there is a separate defined construction corridor for each of Project A and Project B. The draft DCO and the land rights which are sought through the Book of Reference (REP1-014) have been structured such that Project A will be</p>

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	as was discussed at the issue specific hearings of 29th, 30th and 31st July 2025, result in uncertainty about the implementation of the restoration works in the event that there is a gap in the timing of the completion of the first project before the commencement of works on the second project, raising the possibility either that there could be a significant amount time during which restoration may not be undertaken within any particular stage or works or the need potentially to commence works on the second project after the completion of restoration on the first project, resulting in land being disturbed again after it has been subject to the initial restoration. The County Council is concerned that this scenario needs to be avoided.	restricted to undertaking works within their allocated corridor, and vice versa for Project B. This means that with the exception of the shared work areas, irrespective of whether the construction of the Transmission Assets is undertaken concurrently or sequentially, that when the works for each project are complete and the land reinstated, that same land will not be subject to further works on the basis that each project will only have rights to undertake works in its own separate construction corridor.
REP4-136 136.11	Schedule 1 – Authorised Project 3.4. Lancashire County Council does not have any additional comments to make on Schedule 1 – Authorised Project at this stage.	Noted.
REP4-136 136.12	Schedules 2A and 2B - Requirements (Projects A and B) 3.5. The following section set out Lancashire County Council comments in relation the Requirements set out in Schedules 2A and 2B. As the Requirements set out in the two schedules are essentially the same the comments should be read as applying to both schedules.	Noted.
REP4-136 136.13	<u>Requirement 1 Time Limits</u> 3.6. The County Council does not have any comments on Requirement 1 Time Limits. <u>Requirement 2 Offshore Works Design Parameters</u> The County Council does not have any comments on Requirement 2 Offshore Works Design Parameters.	Noted.
REP4-136 136.14	<u>Requirement 3 Stages of Authorised Project</u> 3.7. As set out above under the heading of “Articles” in relation to Article 2, Lancashire County Council welcomes the inclusion of the definition of “stage” but it remains concerned that there is	Each project will need to discharge requirements in relation to its own project with the relevant local planning authorities in advance of commencing works. Through this discharge of requirements, the local planning authorities will therefore be aware of each project’s anticipated programme and will therefore be

Reference	IP submission	Applicants' response
	uncertainty about whether the two projects will be undertaken together or sequentially. See the County Council's comments on Article 2 set in paragraphs 3.2 and 3.3 above.	clear at this stage as to whether construction of the projects will be concurrent or sequential.
REP4-136 136.15	<p><u>Requirement 4 Substation Works</u></p> <p>3.8. The Requirement requires submission of the substation works for approval. The County notes that the Requirement does not include any reference to the landscaping proposals or to details of lighting. It acknowledges that these are respectively referred in Requirement 6 and Requirement 17 in relation to Work No 21A and Work No 21B. It is concerned that the details to be submitted in accordance with the Requirements 4, 6 and 17 should be submitted concurrently so that all the details of the substation work are known prior to the approval in accordance with each of the three requirements. Notwithstanding, this point the County Council is content to defer to the Fylde Borough Council on this point as the relevant planning authority.</p> <p>3.9. One further point, is that the County Council requests that the wording of Requirement 4 is amend to state "...have been submitted to and approved by the relevant planning authority in consultation with (Lancashire County Council as) the Highway Authority.</p>	<p>Response to 3.8</p> <p>The Applicants note that Lancashire County Council have deferred this point to Fylde Borough Council. In any event, the Applicants would emphasise that the substation works will not be able to commence until each of Requirements 4 and 6 have been discharged by the relevant planning authority. Lighting details are covered in the outline Design Principles as updated at Deadline 5 (J3/F02) and the design of the substations must be in accordance with the outline Design Principles.</p> <p>Response to 3.9</p> <p>The Applicants updated Requirement 4 of Schedules 2A and 2B to the draft DCO (C1/F07) at Deadline 5.</p>
REP4-136 136.16	<p><u>Requirement 5 Detailed Design Parameters Onshore</u></p> <p>3.10. The County Council does not have any comments on Requirement 5 Detailed Design Parameters Onshore.</p>	Noted.
REP4-136 136.17	<p><u>Requirement 6 Provision of Landscaping</u></p> <p>3.11. Please see the County Council's comments on Requirement 4 Substation Works, set out in paragraph 3.8 above.</p>	Please refer to the response at row REP4-136.15 above.

Reference	IP submission	Applicants' response
REP4-136 136.18	<u>Requirement 7 Implementation and Maintenance of Landscaping</u> 3.12. The requirement refers to the replacement of any tree or shrub that is removed, dies or becomes seriously damaged or diseased within a period of five years. The Requirement does not however refer to the period of maintenance and the County Council considers that period of longer than five years is required given the potential length of the construction phase over the two projects, particularly if undertaken in sequence.	<p>The Applicants responded to this query during Issue Specific Hearing 3 (see paragraph 129 of REP4-106). The Applicants updated the draft DCO (REP4-007) at Deadline 4 to amend the heading of Requirement 7 for clarity. The Applicants reiterate that Requirement 7 relates to the establishment period and should not be confused with the maintenance period. Requirement 7(3) of the draft DCO (REP4-007) provides that any tree or shrub which is removed, dies or becomes seriously damaged or diseased within five years of planting must be replaced in the first available planting season. If the projects are constructed sequentially or with a gap between them, this requirement will still apply to the second project in the same way for any tree or shrub which is planted as part of that second project. The Applicants therefore maintain that this Requirement is appropriately drafted and does not need to be amended.</p> <p>Details in relation to landscaping monitoring and management are addressed within the outline Landscape Management Plan, which is secured through Requirement 6 of Schedules 2A and 2B of the draft DCO.</p>
REP4-136 136.19	<u>Requirement 8 Construction Code of Practice</u> 3.13. The County Council does not have any comments on Requirement 8 Construction Code of Practice.	Noted.
REP4-136 136.20	<u>Requirement 9 Traffic and Transport</u> 3.14. Please refer to Appendix 1 for comments from the Local Highway Authority. <u>Requirement 10 Highway Accesses</u> Please refer to Appendix 1 for comments from the Local Highway Authority.	Noted.
REP4-136 136.21	<u>Requirement 11 Onshore Archaeology</u> 3.15. The Requirement requires the submission of an archaeological Written Scheme of Investigation (WSI).	The Applicants updated the draft DCO at Deadline 4 (REP4-007) in consideration of these points raised by LCC. The drafting now acknowledges

Reference	IP submission	Applicants' response
	<p>3.16. LCC was consulted on the Onshore & Intertidal WSI and are happy with its contents, and that the provisions of the current draft DCO will ensure the proper and necessary implementation of the WSI across the development.</p> <p>3.17. The Outline Onshore and Intertidal WSI mentions that there will be the production of Site Specific WSIs (SSWSI) and that these will be tailored to each site. It will then be a matter for the Lancashire County Council archaeologist to ensure that all reasonable possible outcomes are covered in the WSIs. This being the case, as requested at the hearing that the wording in paragraph 2 be amended to state "and/or any subsequent Site Specific WSI (SSWSI) considered to be necessary" added after "...and intertidal written scheme of investigation".</p> <p>3.18. This would reinforce the fact that works undertaken as part of the Outline Onshore & Intertidal WSI may not be the only work needed to be undertaken in a stage.</p>	<p>that there may be 'relevant site specific archaeological written schemes of investigation', which must accord with the outline onshore and intertidal written scheme of investigation.</p>
<p>REP4-136 136.22</p>	<p><u>Requirement 12 Ecological Management Plan</u></p> <p>3.19. The Requirement requires submission of an Ecological Management Plan. The County Council considers that the purpose of this Requirement is not clear and in particular whether in fact it intended to deal with ecological mitigation rather than ecological management? It appears that this is the purpose of the Requirement. The County Council also considers that the scope of the Requirement needs to be expanded to cover the issues raised in the County Council's Local Impact Report (LiR).</p>	<p>The Applicants welcome LCC's comment regarding Requirement 12 of Schedules 2A and 2B of the draft DCO (REP4-007). An Outline Ecological Management Plan (REP4-058) has been prepared and submitted with the application. The Applicants have made a commitment (CoT76 of Volume 1, Annex 5.3: Commitments Register of the ES (REP4-018)) to developing Detailed Ecological Management Plan(s) in line with the Outline Ecological Management Plan. The Outline Ecological Management Plan provides information regarding ecological mitigation measures (Section 1.5, 1.6 and 1.7) and management of the mitigation (Section 1.8 and Appendix B and C) and therefore it is appropriate for it to be called an Ecological Management Plan. In addition, the naming of the plan does not influence the contents of the plan.</p> <p>The Applicants responded to the County Council's LiR in detail (see REP2-039). This response sets out where each point raised is either already dealt with within the outline EMP or why it is not appropriate for that issue to be dealt with via the LiR.</p>

Reference	IP submission	Applicants' response
REP4-136 136.23	<u>Requirement 13 European Protected Species Onshore</u> 3.20. The County Council does not have any additional comments on Requirement 13 European Protected Species Onshore.	Noted.
REP4-136 136.24	<u>Requirement 14 Construction Hours</u> 3.21. The Requirement sets out the proposed construction hours, with these proposed to be 0700 and 1900 from Monday to Saturday, with no activity on Sundays or bank holidays. The applicants confirmed at the hearing that the working hours in Saturday would be reduced to 0700 to 1300. 3.22. The County Council is concerned that the 0700 start time would in some locations where construction works would take place close to sensitive receptors including residential properties, be too early and would be likely to give rise to unacceptable disturbance early in the morning. It therefore considers that such locations are identified where a later start time of 0800 would be adopted. It is suggested that this might apply where works are proposed within 200 metres of a residential property. The restriction might also need to apply to site set up where this involves the construction of construction compounds or access points.	<p>The Applicants have amended the draft DCO at Deadline 4 (REP4-007) as noted during the hearings to amend Saturday working hours to 07:00-13:00. The Applicants position remains that this is an appropriate timeframe as further shortening of the working hours disproportionately reduces the productive on-site working time once CDM-required mobilisation, health and safety briefings, mandated breaks and demobilisation are accounted for. Retaining 07:00 – 19:00 core working hours (and 07:00-13:00 on Saturdays) allows for efficient delivery and shortens the active construction period at any one location, thereby limiting the duration of local disturbance. These hours are consistent with comparable DCO decisions, including Awel y Môr, Mona and Hornsea 4.</p> <p>To protect residential amenity, the Outline Construction Noise and Vibration Management Plan (J1.3/F03) was updated at Deadline 4 to secure noise control mitigation measures and noise limits on mobilisation activities undertaken during the start-up (06:00 to 07:00) and during the shutdown (19:00 to 20:00). Noise monitoring will also be undertaken during the construction works at noise sensitive receptors (including mobilisation) in accordance with the detailed Construction Noise and Vibration Management Plan. This is secured further through the updated noise requirement (Requirement 18 of Schedules 2A and 2B of the draft DCO (C1/F07)) updated at Deadline 5.</p> <p>Given the secured controls, the Applicants do not consider receptor-specific working hour restrictions necessary, as such restrictions would risk prolonging works and increasing overall disturbance without delivering additional substantive benefit.</p>
REP4-136 136.25	<u>Requirement 15 Fencing and Other Means of Enclosure</u> 3.23. The County Council does not have any additional comments on Requirement 15 Fencing and Other Means of Enclosure.	Noted

Reference	IP submission	Applicants' response
REP4-136 136.26	<p><u>Requirement 16 Restoration of Land used Temporarily for Construction</u></p> <p>3.24. Please see the County Council's comments on Article 2 set out in paragraphs 3.2 and 3.3 above and also in relation to Requirement 3 set out in paragraph 3.7 above.</p> <p>3.25. The County Council was concerned that the original draft DCO did not set out in Requirement 16 a timescale for the restoration of land used temporarily for construction, and therefore welcomes the insertion of the twelve months time limit for restoration following completion of the relevant stage. However, it remains concerned that the phasing of works across the two projects may result either in the need to leave land unrestored for a period of more than twelve months, or result in land restored following the completion of the first project having to be disturbed again when construction project commences, as set out in County Council's comments on Article 2 in paragraphs 3.2 and 3.3 above.</p>	<p>The Applicants would refer to the response at REP4-136.10 above. The Applicants would emphasise that for the majority of the Transmission Assets Order Limits, there are distinct areas where each of Project A and Project B works may be undertaken, meaning that the same land across this cable corridor, with the exception of discrete shared works areas, will not be disrupted as part of both Project A and Project B.</p> <p>The Applicants further highlight the amends made to the draft DCO at Deadline 4 (REP4-007) such that reinstatement is to be within that 12 month timescale subject to alternative agreement with the relevant planning authority. The Applicants believe this addresses the County Council's concerns.</p>
REP4-136 136.27	<p><u>Requirement 17 Control of Operational Artificial Light Emissions</u></p> <p>3.26. Requires the submission of a written scheme for the management and mitigation of internal and external artificial lighting. Please see the County Council's comments on Requirement 4 Substation Works, set out in paragraph 3.8 above.</p>	Please refer to the response at row REP4-136.15 above.
REP4-136 136.28	<p><u>Requirement 18 Control of Noise During Operational Stage</u></p> <p>3.27. Requires the submission of an operational noise management plan (NMP). The County Council does not have any additional comments on Requirement 18 Control of Noise During Operational Stage.</p>	Noted.
REP4-136 136.29	<p><u>Requirement 19 Employment and Skills Plan</u></p> <p>3.28. Requires submission of an employment and skills plan. The County Council questions whether the Requirement should set out in more detail, what details are to be included in the plan.</p>	Requirement 19(2) is drafted such that the Employment and Skills Plan which is submitted in relation to discharge of this requirement must be in accordance with the outline Employment and Skills Plan. This therefore adequately provides

Reference	IP submission	Applicants' response
		control in relation to the details which the Employment and Skills Plan must cover. It is appropriate to have this level of detail in the outline plan at this stage, so that a detailed plan that is relevant at the time of implementation can be agreed with the discharging authority.
REP4-136 136.30	<p><u>Requirement 20 Operational Drainage Management Plan</u></p> <p>3.29. As set out above the representatives of the LLFA were unable to attend the issue specific hearings on 29th,30th and 31st July 2025. They nevertheless advise that they have reviewed the recording of the session dealing with the Requirements, and specifically Requirement 20.</p> <p>3.30. To clarify the LLFA position in relation Requirement 20 it advises, as previously set out in paragraph 11.18 of Lancashire County Council's Local Impact Report and in its written comments on Item 6a(3) submitted on 28 July 2025, that the detailed Operational Drainage Management Plans should be submitted to and approved by the relevant Local Planning Authority, in consultation with the Lead Local Flood Authority and the Environment Agency as appropriate. This differs from the approach discussed during Session 4 at the hearing on 31 July 2025, where approval of the Plans was suggested to sit with the Lead Local Flood Authority.</p> <p>3.31. The LLFA advises in relation to Agenda Item 6b of the hearing on 30th July 2025, (update on negotiations with interested parties), which Neil Stephens (NS) (for LCC) contributed to during the Hearing, that it is understood that Jane Turner (LCC Solicitor) will be separately confirming the updated position regarding Part 10 of the Development Consent Order (Protective Provisions for the protection of the Lead Local Flood Authority, specifically in relation to Sections 23 and 24 of the Land Drainage Act).</p>	The Applicants thank Lancashire County Council for their clarificatory submissions. The Applicants have liaised with Lancashire County Council regarding this Requirement and have updated the draft DCO (C1/F07) to reflect the preferred drafting by the County Council.
REP4-136 136.31	<p><u>Requirement 21 Offshore Decommissioning</u></p> <p>3.32. The County Council does not have any additional comments on Requirement 21 Offshore Decommissioning</p>	Noted.



Reference	IP submission	Applicants' response
	<p><u>Requirement 22 Onshore Decommissioning</u></p> <p>3.33. The County Council does not have any additional comments on Requirement 22 Onshore Decommissioning</p> <p><u>Requirement 23 Requirement for Written Approval</u></p> <p>3.34. The County Council does not have any comments on Requirement 23 Requirement for Written Approval.</p> <p><u>Requirement 24 Amendments to Approved Details</u></p> <p>3.35. The County Council does not have any comments on Requirement 24 Amendments to Approved Details.</p>	
REP4-136 136.32	<p>4. Updated Statements of Common Ground, including Summaries of the Principal Areas of Disagreement.</p> <p>4.1. The following comments and updates are based on the Morgan And Morecambe Offshore Wind Farms: Transmission Assets Lancashire County Council SoCG F01, Document Reference: S_D1_6.1/F02, dated 7th July 2025, and specifically sections 1.4.2 to 1.4.8.</p> <p><u>Hydrology and Flood Risk</u></p> <p>4.2. Essentially all matters agreed, subject to updating the Outline Code of Construction Practice (CoCP) and the Outline Operational Drainage Management Plan that will be updated at Deadline 4 to reflect the adoption of this new standard at detailed design</p> <p>4.3. The Council has no further update from the position set out in section 1.4.2 of the 7th July 2025 version of the Statement of Common Ground (Document Reference: S_D1_6.1/F02)</p> <p><u>Onshore Ecology and Nature Conservation</u></p> <p>4.4. An updated version of the SOCG in relation to ecological matters was returned to the applicant on 5th August 2025. Essentially, all issues listed in the SOCG still need further discussion below any of the issues can be concluded as agreed.</p> <p><u>Landscape and Visual Resources</u></p>	<p>The Applicants note the update provided by LCC and are committed to further engagement on all SOCG matters.</p>

Reference	IP submission	Applicants' response
	<p>4.5. Further meetings have been arranged with the applicant to discuss Green Belt and Landscape and Visual matters and therefore the SoCG relating to those topic areas cannot be advanced until those discussions have taken place.</p> <p><u>Land Use and Recreation</u></p> <p>4.6. The Council has no further update from the position set out in section 1.4.5 of the 7th July 2025 version of the Statement of Common Ground (Document Reference: S_D1_6.1/F02).</p> <p><u>Historic Environment</u></p> <p>4.7. The Council has no further update from the position set out in section 1.4.6 of the 7th July 2025 version of the Statement of Common Ground (Document Reference: S_D1_6.1/F02).</p> <p><u>Traffic and Transport</u></p> <p>4.8. Please refer to Appendix C for comments from the Local Highway Authority.</p> <p><u>Development Consent Order</u></p> <p>4.9. The position of the County Council with regard to the draft DCO is set out above. The County Council position with regard to the dDCO can only be confirmed once the applicant has responded to the issues raised and a revised draft has been provided.</p>	


Table 2.2: RPE4-136 – Response to Appendix A of LCC’s Deadline 4 submission: LCC Landscape Comments (ISH Item 2)


Reference	IP submission	Applicants' response
REP4-136 136.33	<p>1.0 Introduction</p> <p>1.1 This document has been documented in conjunction with site visits with Fylde Borough Council Landscape Architect (LA) Kathryn Lythgoe (KL) and LCC Landscape Architect (LE). Photographs taken are from the site visit dated 06.08.25 during sunny weather.</p>	<p>The Applicants thank LCC for their commentary, welcoming their written submission alongside the ongoing engagement process via the Statement of Common Ground process in the lead up to Deadline 5.</p> <p>At the outset of their responses to LCC's submitted commentary, the Applicants reiterate, as they have done in previous submissions, that the methodology and professional judgements applied in the assessment presented</p>


Reference	IP submission	Applicants' response
	<ul style="list-style-type: none"> • <i>Note photos are not intended to be visualisations but solely recording baseline views from an average mobile phone camera to help communicate observation.</i> • <i>Note also hedgerows are currently around maximum heights and the landscape pattern is generally managed hedgerows at circa 1.5m (likely to be cut from September onwards due to regulations governing bird nesting seasons).</i> • <i>These comments do not include assessment of The Landscape and Visual Technical Note (July 7). These comments to follow.</i> • <i>Comments should be read in conjunction with previous LCC LA comments;</i> <p>1.2 Photographs reference PRoW, Bridleway views and also reference existing Application Viewpoints, where appropriate.</p> <p>1.3 Bridleway quoted is BW0505016</p> <p>PRoW quoted include; FP0505003,FP0505004, FP0505002,FP0509005.</p>	<p>in <i>Volume 3, Chapter 10: Landscape and Visual Resources (APP-123)</i> have been undertaken in accordance with the <i>Guidelines for Landscape and Visual Impact Assessment, Third Edition (GLVIA3)</i> and EIA best practice.</p> <p>Moreover, in accordance with the established approach for Nationally Significant Infrastructure Projects (NSIPs), the Applicants' consenting strategy is based on <i>Advice Note Nine: Rochdale Envelope</i>. This approach, alongside the submitted project commitments and design principles / codes, secures the parameters for the Transmission Assets through the Environmental Impact Assessment (EIA) process.</p> <p>The <i>Maximum Design Scenario (MDS)</i> defines the maximum construction, operational and decommissioning parameters of the Transmission Assets, which are secured under Requirement 5 of Schedules 2A and 2B of the draft Development Consent Order (dDCO) (REP4-007), ensuring that the substations cannot exceed the assessed parameters. This approach allows the assessment of a realistic worst-case scenario while retaining flexibility for detailed design to be informed by ongoing consultation and the design governance process secured in the dDCO.</p> <p><i>Volume 3, Chapter 10: Landscape and Visual Resources (APP-123)</i> is therefore a proportionate and robust assessment of likely significant effects, supported by representative viewpoints and visualisations, which was agreed with the relevant planning authorities and statutory consultees – as part of the Expert Working Group (EWG), which included LCC – prior to the Examination of the Transmission Assets. At that stage, EWG consultation confirmed agreement on the following:</p> <ul style="list-style-type: none"> • The representative viewpoints for the onshore substations, as presented in the PEIR, acknowledging that final view orientations could be subject to micro-siting; • The representative and candidate viewpoint locations for the River Ribble crossing; and • The presentation of grey-rendered photomontages illustrating the main buildings and associated infrastructure at the onshore substations from all agreed viewpoint locations. <p>Accordingly, no further photography was requested or undertaken after February 2024.</p>

Reference	IP submission	Applicants' response
		The Applicants therefore reaffirm that the assessment provides a sound evidential base for the ExA's consideration of landscape and visual effects.
REP4-136 136.34	<p>2.0 Views and Viewpoints</p> <p>2.1 The Morecambe Substation site was approached from the footpaths noted above (S-N). It became apparent that views within the whole of this general area are fairly flat, rising to the north to a ridgeline. Through interpolation it appears the Morecambe Substation will appear on this ridgeline, when viewed from the south looking north and that this will dominate the view from much of this outlook and these footpaths, given that very little significant screening (scrub max. height 1-2m) is proposed (due to underground cables). This will decimate these existing views and landscape character.</p>  <p>It is likely views of the Bluefield Solar Farm will be seen in conjunction with views of the Morecambe and Morgan Substation, from around this location, contributing to cumulative adverse effects within this area of attractive tranquil, open countryside.</p> <p>View of ridgeline (in background) on which Morecambe would be located.</p> <p>2.2 It was noted that views from this location also offer tranquillity, views of cows grazing etc., there are long and open views of the landscape.</p>  <p>Further view of the ridgeline nearer to the site area from PRoW FP0505003</p> <p>The above (2.1. and 2.2) can be viewed alongside Viewpoint 6, which clearly identifies the scale of the Substation in relation to its immediate area. Without exact detailing from the applicant it is</p>	<p>The Applicants note the commentary in relation to views towards the proposed Morecambe Substation from public rights of way to the south , including the landscape officer's observations on the landscape local topography, landscape character and tranquillity.</p> <p><u><i>Views experienced by walkers using the footpath north of the A584</i></u></p> <p>In respect of views experienced by walkers using the footpath north of the A584, the Applicants refer its own descriptions of Viewpoint 6, as documented in <i>Volume 3, Annex 10.3: Visual Baseline Technical Report</i> (APP-126). Consistent with LCC's observations, the Applicants' records "...near, open view looking north west..." across "...a pasture field south of the Morecambe Substation site" with "...rising land beyond within the Substation site. Hedgerows and scattered trees define some field boundaries and punctuate the skyline to the left and right of the view."</p> <p>The Applicants, however, note that LCC emphasise the "<i>long and open views of the landscape</i>" but they do not include reference to the visibility of overhead power lines and pylons, which cross the area and puncture the skyline, and glimpses of existing development at the edge of Kirkham evident through and above intervening vegetation. These existing features are recorded by the Applicants in APP-126 for Viewpoint 6.</p> <p>With regard to LCC's comments that "...it is unclear how the built form will sit on this ridgeline..." and that the summer viewpoint is "...misleading, as the extent of proposed tree planting implies a much larger area...", the Applicants reaffirm that all submitted visualisations have been produced in accordance with the Landscape Institute's <i>Technical Guidance Note 06/19: Visual Representation of Development Proposals</i> (2019), presented as Type 3 visualisations. As stated in the best practice guidance (page 19), this type of visualisation represents "...design, form and context to a reasonable degree of objectivity and accuracy, one which can be understood and relied on by competent authorities and others." [emphasis added by the Applicants]. The Applicants acknowledge the limitations of visual representation in Section A.1.5 of Volume 3, Annex 10.4: Landscape and Visual Impact Assessment Methodology (APP-127).</p>


Reference	IP submission	Applicants' response
	<p>unclear how the built form will sit on this ridgeline, it could appear closer and not set back on the ridgeline as indicated on the Viewpoint.</p> <p>Equally the Viewpoint does not give an impression of how extensive this view would be from this southerly extent, due to the relatively flat areas to the south and the number of PRow in this area. The Viewpoint is unable to detail how the permanent access track conflicts with PRow and creates an additional permanent visual scar on Landscape Character.</p> <p>The summer viewpoint (presumably Year 15- as not yet assessed updated documents) is misleading, as the extent of proposed tree planting implies a much larger area, whilst on plan this is a narrow band (also restricted by the lozenge shaped attenuation). Year 15 views on current layout considered Significant adverse.</p> <p>It is queried whether if fill material were used to raise levels sufficiently above cable lines, whether tree planting would then be permissible above cables? Effectively to extend the ridgeline southwards?</p> <p>Views from the southerly extent of Morecambe Substation looking north from PRow are therefore of concern; they change landscape character irretrievably and appear incongruous in a Greenbelt and rural landscape setting.</p>	<p>The Applicants note LCC's position that visual effects from the public rights of way to the south of the Morecambe Substation, would remain <i>significant adverse</i> at Year 15, whereas the Applicants' assessment concludes that effects would reduce from <i>Major adverse</i> (significant) at Year 1 to <i>Moderate adverse</i> (not significant) at Year 15, following the establishment of mitigation planting as secured within the Outline Landscape Management Plan (oLMP) (J2/F04).</p> <p><u>LCC queries regarding cut and fill material, tree planting and groundworks</u></p> <p>In response to LCC's specific technical queries:</p> <ol style="list-style-type: none"> 1. LCC Question: Whether the use of fill material to raise levels sufficiently above cable lines would permit tree planting above cables? <p>Applicant Response: The Applicants confirm that the planting of trees directly above the cable corridor is not feasible, given the technical and operational requirements associated with the safe installation and long-term maintenance of underground cables. Vegetation in these locations is therefore restricted to low-level shrub and groundcover species only. As set out in the oLMP (J2/F04), National Grid's <i>Notes for Guidance – Tree Planting Restrictions on Pipelines (NJUG 10)</i> and GTC-UK's <i>Tree Planting Guidelines Notes for Guidance – Tree Planting Restrictions on or near Utility Apparatus (BK-ENVIG-0018 Rev 4)</i> specify that only hedge plants may be planted directly above the cables, and that within 6 m of the cable corridor only shallow-rooted, native species are permissible. By selecting species recommended in these guidance documents, which also correspond to those characteristics of the prevailing landscape character, it could be possible to establish a mature hedge of up to approximately 5 metres in both width and height.</p> <p>This approach is consistent with established industry guidance, including that published by National Grid Electricity Transmission (NGET), which outlines how progressively larger planting can be accommodated at increasing distances from the cables, thereby providing opportunities to achieve effective landscape integration without compromising asset integrity.</p> <p>The Applicants also note that no specific request regarding the planting of trees above the cable corridor was raised by the ExA or by other stakeholders during the Examination.</p>

Reference	IP submission	Applicants' response
		<p>2. LCC Question: Whether fill could be used to effectively extend the ridgeline southwards?</p> <p>Applicant Response: Following the granting of consent for the Transmission Assets, a detailed Landscape Management Plan (LMP) will be prepared by Morecambe OWL, prior to commencement of the relevant stage of works at the Morecambe onshore substation and will follow the principles established in the outline Landscape Management Plan (see OLMP, J2/F04).</p>
<p>REP4-136 136.35</p>	<p>2.4 The next views of concern are those looking south from the bottom end of BW0505016 (where contours/ levels begin to fall in a southerly direction and ultimately join the track from Lower Lane (immediately north of the Morecambe Substation area). Equally those from the access track, which although not a Prow is used by locals as such. Here it is likely that the existing hedgerow will be removed for the main part (to enable cable access) and the proposed band of planting is narrow.</p> <p>Existing trees may warrant removal as Ash is displaying dieback disease, thus increasing visual effects, particularly in wintertime. It is unknown to date what format and layout the Substation may take in relation to existing levels i.e. whether it would be sunk below Ground Level (GL), nevertheless the narrow band of planting visually emphasises the location and extent of the Substation, it does not relate to the pattern of the Landscape Character.</p> <div data-bbox="342 1018 1023 1233">  </div>	<p>The Applicants note LCC's commentary regarding views and its concerns about the degree of visual effects associated with the onshore substations.</p> <p><u>Visual effects on users of the bridleway south of the Morgan substation</u></p> <p>The assessment of visual effects on users of the bridleway south of the Morgan onshore substation site – represented by Representative Viewpoint VP1 in <i>Volume 3, Chapter 10: Landscape and Visual Resources</i> (APP-123), paragraphs 10.12.5.10 to 10.12.5.17 – concludes that in Year 1 before the establishment of proposed mitigation planting (see oLMP, J2/F04), effects would be of <i>Major adverse significance</i> (significant), reducing to <i>Moderate adverse significance</i> (not significant) once the mitigation planting has established. LCC judge that effects would remain 'significant adverse' at Year 15.</p> <p>.</p> <p><u>Details regarding unknown substation form, layout and levels</u></p> <p>On the matter of the “unknown” format, layout and levels of the substations, and the potential for design responses in this regard, reference is made to the Applicants' response at 136.34 and 136.35 above, which set out the Applicants' consenting strategy and respond to LCC's specific technical queries about “sunk” development platforms. Furthermore, the Applicants refer LCC to the indicative layouts presented in the document <i>Technical Note: Landscape and Design Matters</i> (REP3-064) and the supporting topographic information in the same document; and the Deadline 5 submission, S_D5_6/F01), which have been submitted in response to <i>Hearing Action Point ISH2.17</i>. It is noted that the development of the proposed levels design will continue as part of the post consent design development phase in preparation of Requirements discharge.</p> <p>In relation to the potential harm to the spatial and visual openness of the Green Belt, LCC is directed to Section 1.6 of the <i>Green Belt Technical Note</i> (REP4-092), which presents the Applicants' assessment of harm to openness and to the</p>

Reference	IP submission	Applicants' response
	<p>View of Morecambe Substation area from ProWFP0505003 where it intersects with the track to Lower Lane and Bridleway 0505016. Two Ash (right) would likely need removal, due to Ash Die-back disease.</p>  <p>View of Substation area would act as the visual focus at the end of the Bridleway (existing summer views). Views would compound those just experienced of the Morgan substation (Cumulative). A rural landscape would become urban. The landscape character would not be visible and tranquillity would be destroyed.</p> <p>Current layout views would be Significant adverse and remain Significant adverse at Y15.</p> <p>Views looking South from Bridleway of concern, due to harm to the open and rural landscape setting of the Greenbelt.</p>	<p>relevant Green Belt purposes, alongside other potential landscape and visual impacts during both construction and operation.</p>
<p>REP4-136 136.36</p>	<p>2.5 The ridgeline between what would be the Morgan and Morecambe Substations is an important natural feature and if retained and used in conjunction with sunk levels could help screen views looking northwards from the Bridleway at lower sections (see in green on map below) towards Morgan Substation.</p> <p>This is currently proposed as cable route and it is unknown if land profiles would be changed, or if cables were at greater depths this would enable tree planting?</p>	<p>The Applicants note LCC's commentary and provide the following responses:</p> <p><u><i>The ridgeline between substations and 'missing justification'</i></u></p> <p>Regarding LCC's comments concerning the elevated location of the substation sites and the perceived "<i>missing justification</i>" for their siting, including the comparison to churches and castles historically located on high ground "<i>for cultural reasons or reasons of defence</i>", the Applicants do not consider that direct comparisons with historic siting of churches or defensive structures are relevant to the assessment of modern electrical infrastructure vital for national energy generation and distribution systems. Therefore, the Applicants can only refer LCC to Section 1.4 of the <i>Green Belt Technical Note</i> (REP4-092). This section sets out the Transmission Assets' site selection process and the associated technical justification in full.</p> <p><u><i>LCC query regarding cable depth and tree planting</i></u></p> <p>In response to LCC's third technical query (of their D4 representation) regarding whether the planting of trees above the cable route would be enabled if the</p>



Reference	IP submission	Applicants' response
	 <p data-bbox="338 627 1115 782">2.6 Photos of the ridgeline in this (below) location correspond roughly to Viewpoint 1. It is circa 16 AOD. Whilst churches and castles were placed at high spots for cultural or reasons of defence, it appears we now propose Substations, but the justification seems to be missing.</p>	<p data-bbox="1122 252 2085 311">cables were installed at a greater depth, the Applicants reiterate the position previously outlined at paragraph 136.34.</p> <p data-bbox="1122 323 2085 446">While it is acknowledged that deeper installation could, in theory, provide additional clearance for certain tree species, the engineering requirements and additional construction costs associated with this approach would be significant and would compromise the overall viability of the scheme.</p> <p data-bbox="1122 459 2085 606">The Applicants emphasise that the cable installation depths have been determined in accordance with established industry standards and best practice, balancing technical feasibility, operational safety, and cost efficiency. This approach also ensures that the mitigation planting strategy can be effectively delivered within the constraints of the cable corridor.</p> <p data-bbox="1122 619 2085 654"><u>The loss of long and distant views</u></p> <p data-bbox="1122 667 2085 790">Regarding LCC's comments on the loss of long and distant views towards a variety of natural and man-made landscape features, including north-west landmarks, the Applicants refer to their assessment of visual effects represented by Representative Viewpoint VP1.</p> <p data-bbox="1122 802 2085 1013">As set out at paragraph 136.35 above, the assessment concludes that in Year 1 before the establishment of proposed mitigation planting (see oLMP, J2/F04), effects would be of <i>Major adverse significance</i> (significant), reducing to <i>Moderate adverse significance</i> (not significant) once the mitigation planting has established. The Applicants consider that this assessment fairly represents the nature of the loss identified by LCC at Year 1, noting that LCC judges that effects would remain 'significant adverse' at Year 15.</p>


Reference	IP submission	Applicants' response
	  <p data-bbox="342 861 1115 901">The open landscape and rural character, long and distant views of the Greenbelt in the proposed Morgan Substation area.</p>  <p data-bbox="342 1236 1115 1394">From the Morgan Substation site area long and distant views are afforded, not just of wide and open skies and the rural landscape, but of North West landmarks in the distance, such as Darwin Tower, Great Hill, Winter Hill and Rivington. These views would for the most part be lost by the Substations presence and</p>	


Reference	IP submission	Applicants' response
	imposition. Proposed landscape mitigation could not compensate for this visual loss.	
REP4-136 136.37	<p>2.7 Viewpoint 3 is likely one of the most critical Viewpoints demonstrating clear significant harm to the landscape character and Greenbelt by the proposed development.</p> <p>The Viewpoint illustrates only a small proportion and angle of view in this location (it is usual to indicate the angle of view) and other than serve the Applicant, a single frame view demonstrates little in terms of context, setting and character.</p> 	<p>The Applicants note LCC's commentary and provide the following responses:</p> <p><u><i>Visual effects at Viewpoint 3 and the competency of supporting visualisations</i></u></p> <p>Regarding LCC's commentary on the presentation of supporting visualisations and the angle of view, the Applicants direct LCC to the supplementary information submitted at Deadline 3 (see <i>F3.12 Environmental Statement Volume 3, Figures – Part 6 of 7 – Rev F02</i>, REP3-015). This document responds directly to the same points raised by LCC in their <i>Local Impact Report</i> (REP1-085), providing additional detail to support a comprehensive understanding of the visual assessment material presented within the ES, as is being requested again here.</p> <p>In relation to the horizontal field of view (HoFV), the submitted visualisations comply with best practice as set out in the Landscape Institute's <i>Technical Guidance Note 06/19: Visual Representation of Development Proposals</i> (2019). Furthermore, Appendix A of <i>F3.10.3 Volume 3, Annex 10.3: Visual Baseline Technical Report</i> (APP-126) presents an 180° angle of view from each representative viewpoint associated with the substations and landfall, recording the visual baseline at the time of assessment. Section 1.4 of the same document provides the Applicants' description of each viewpoint. The Applicants confirm that the viewpoints selected are representative of the views, supporting the assessment of visual effects described in ES paragraphs 10.12.5.10 to 10.12.5.17, which was also informed by on-site survey work.</p> <p>The assessment concludes that in Year 1, before the establishment of proposed mitigation planting (see oLMP, J2/F04), effects would be of <i>Major adverse significance</i> (significant), reducing to <i>Moderate adverse significance</i> (not significant) once the mitigation planting has established. LCC judge that effects would remain 'significant adverse' at Year 15. Regarding LCC's commentary on whether the visualisations are "<i>actually correct in scale</i>" the Applicant refers to its response at 136.34 above that reaffirms that all submitted visualisations have been produced in accordance with best practice guidance, and that the type of visualisation presented in support of the Applicants' assessment is represents the "<i>...design, form and context to a reasonable degree of objectivity and accuracy, one which can be understood and relied on by competent authorities and others.</i>" [emphasis added by the Applicants]. The Applicants further</p>

Reference	IP submission	Applicants' response
	<p>As has been stated to date, the sheer scale of 4 No. 140m x 80m x 15m buildings, switchgear, urban style 3m high palisade fencing etc. would adversely change the landscape character irretrievably, introducing urban elements, extending the urban area into the Greenbelt and weakening land areas in the Greenbelt, further north and west.</p> <p>Discussions on site queried whether Figure 10.5.14 is actually correct in scale, but to check this would require commissioning a competent landscape architect specialising in visualisations and a rather more relaxed timescale.</p> <p>To state the Substation has a 35year lifetime adds further impact to the greenbelt area. Its developed status, with its associated hardstandings etc. would then constitute greybelt or brownfield and would be open to further development, not a return to Greenbelt.</p> <p>Narrow bands of proposed planting do little to fully screen the full height of the built form and the northern elevation could not be screened due to cable locations. This has been accepted by all to date. The proposed mitigation currently emphasises the built form, not the landscape pattern and insufficient space exists on the western boundary to screen the Substation and its paraphernalia from the existing Bridleway. The Landscape Technical Note (July 7), has yet to be assessed to determine any improvements in this regard. To date there is little information on detailed layout, albeit the ODP conveys an impression of large scale, huge sheds resembling the massive warehouses seen alongside motorways, with a nominal line of tree planting completely out of scale with its adjacent development.</p> <p>It is questionable whether mitigation can adequately visually integrate such large scale structures of this magnitude into this landscape character type without irreparable damage to its Greenbelt location.</p> <p>Having viewed the Bridleway on a couple of occasions and further to Fylde's LA KL, it may be that the bridleway itself forms a former ancient trackway (tbc FBC Heritage). Certainly on both</p>	<p>acknowledge the inherent limitations of visual representation in Section A.1.5 of <i>Volume 3, Annex 10.4: Landscape and Visual Impact Assessment Methodology</i> (APP-127).</p> <p>The Applicants also confirm that the visualisation produced where undertaken by a qualified and competent professional who specialises in visualisations of this nature.</p> <p><u>Green Belt</u></p> <p>The Applicants refute the suggestion that the presence of the substation would result in the existing area of Green Belt being regarded as "Grey Belt" or brownfield land.</p> <p>Any future development within this area would continue to require planning consent from the local planning authority, and this controlling mechanism would therefore remain in place for any potential development proposals in the future.</p> <p><u>Landscape Mitigation Strategy</u></p> <p>In response to LCC's commentary about the "<i>Narrow bands of proposed planting...</i>" the Applicants reaffirm their position, as set out in Section 1.3.2 of the oLMP (J2/F04), that the principal objective of the proposed landscape strategy is to integrate, filter and/or screen views of the onshore substations. The Applicants confirm that the proposals do not seek to achieve complete screening of the substations, but rather to provide appropriate visual mitigation that reflects the receiving landscape context.</p> <p>The Applicants further note that the final species selection will be confirmed and secured through the detailed Landscape Management Plan, to be prepared and agreed as part of the post-consent process. This will follow consultation with the relevant officers of the local planning authority responsible for discharging the associated requirement.</p> <p><u>The substations form and layout</u></p> <p>The Applicants refer LCC to the Applicants presentation of the <i>indicative</i> layout of each proposed substation in the <i>Technical Note: Landscape and Design Matters</i> (REP3-064), which responded to the ExA Q13.1.4 <i>Indicative layout of proposed substations</i>.</p>

Reference	IP submission	Applicants' response
	<p>visits on separate occasions this trackway demonstrated a profusion of wildlife, from butterflies to dragonflies, on account of existing ditches and wildflowers along its length. It appears landscape proposals intend to possibly formalise the track (to maintain access) and this (alongside potential development adjacent and cable installation) would damage the ecosystem, which operates along its extent.</p>	<p>Each 3D illustration depicts and annotates the <i>indicative</i> layout drawings for each proposed substation, notating the different structures, equipment and buildings that would generally be required for each.</p> <p>The indicative layout plan for each substation now is also provided as part of the sequence of pre consent drawings within the interim updated oDP and that inform the Works Plans and project parameters.</p> <p><u><i>History of the bridleway and future proposals</i></u></p> <p>The Applicants note that the bridleway is not depicted on any cartographic sources preceding the 1838 Freckleton Tithe Map. This does not preclude the possibility that the route existed prior to that date; rather, it indicates that the track was not formally recorded on earlier mapping.</p> <p>In terms of historic landscape character, the track delineates the boundary between an area of Ancient Enclosure to the west and Post-Medieval Enclosure to the east, where the Morgan substation is located. It is, therefore, plausible that the track was established in connection with the enclosure of land to the east, or that an earlier route was subsequently straightened. In the absence of an enclosure map for Freckleton, however, this cannot be determined with certainty.</p> <p>The Applicants can additionally confirm that they do not intend to “<i>formalise the track</i>”, (assuming LCC continues to refer to the bridleway BW0505016) retaining its current character, in acknowledgment that changes to the baseline environment would occur in and next to the extent of the Order Limits, as reported in the ES.</p>
<p>REP4-136 136.38</p>	<p>2.8 Viewpoint 12 illustrates Views from Bridleway 0505016, however as has been stated previously, this Viewpoint is almost the furthestmost location on the track and therefore effects are naturally reduced with distance. Were the Viewpoint taken from adjacent Freshfield Farm, as the photograph below, the effects would have been considerably more significant, due to proximity. It is also useful to appreciate effects on adjacent properties, as rear windows and garden areas would view the Substation.</p>	<p>The Applicants note LCC's commentary in relation to Viewpoint 12.</p> <p>In response, the Applicants maintain their decision to include this viewpoint, which is considered representative of views experienced by public footpath users at the point where they join the route from the edge of Kirkham.</p> <p>The Applicants acknowledge that the documented visual effects would have been greater had the viewpoint been located closer to the substation sites and Freshfield Farm. However, in accordance with best practice guidance set out in GLVIA3, representative viewpoints can be selected to represent the experience of different types of visual receptors and the differing experiences of the same receptor. On this basis, the Applicants consider the selection of the location of Viewpoint 12 to be robust as Viewpoint 3 illustrates the experience of PRoW users approaching and passing the Morgan substation, reporting <i>significant</i></p>

Reference	IP submission	Applicants' response
	 <p data-bbox="342 502 1115 662">At the moment the random area of planting for proposed pond replacement is not accepted, as it does not replicate the landscape pattern, therefore any screening at this location is subject to discussion and agreement. The hills currently form a backdrop to views.</p>	<p data-bbox="1126 252 2085 375"><i>adverse</i> effects, whereas Viewpoint 12 presents the experience of PRoW users at the edge of Kirkham, looking east across farmland and the open views available, where it has been assessed the effects would be <i>Moderate adverse</i> at Year 1 (not significant), reducing to <i>Minor adverse</i> (not significant) at Year 15.</p> <p data-bbox="1126 391 2085 502">The Applicants further note that the locations of representative viewpoints and the associated visualisations were agreed with the relevant planning authorities and statutory consultees prior to the Examination of the Transmission Assets. Further details of this consultation in set out above in 136.34.</p>
<p data-bbox="152 667 331 742">REP4-136 136.39</p>	<p data-bbox="342 667 1115 798">2.9 The image below is taken from BW0505016 (close to Viewpoint 3 location), looking towards residential properties, fronting Manor Drive, situated closely adjacent to the A583. They are at a slightly raised level.</p>  <p data-bbox="342 1133 1115 1369">Summertime views would generally be limited to upper storey front views of a large extent of the Greenbelt area, seen in conjunction with The Area of Separation. A permanent access point close to this location would necessitate the removal of circa 5 hedgerow trees. Winter views would extend through any existing foreground vegetation, views of the Substation and paraphernalia would be apparent, as would the change in landscape pattern. The edge of the urban area would effectively</p>	<p data-bbox="1126 667 2085 821">In relation to the potential harm to the spatial and visual openness of the Green Belt, LCC is directed to Section 1.6 of the <i>Green Belt Technical Note</i> (REP4-092), which presents the Applicants' assessment of harm to openness and to the relevant Green Belt purposes, alongside other potential landscape and visual impacts during both construction and operation.</p>

Reference	IP submission	Applicants' response
	<p>become the edge of the Substation site (from Lower Lane). Landscape Proposals do not demonstrate sufficient mitigation to reduce this effect.</p>	
<p>REP4-136 136.40</p>	<p>2.10 Viewpoint 13 baseline and the view below clearly illustrates the Greenbelt working successfully alongside The Area of Separation, the strength of the landscape pattern and landscape character. The Visualisation of the built form demonstrates an annihilation of the Greenbelt, a clear and harsh imposition of built elements, which present an impression of an urban edge, circa 500m from that existing along Lower Lane. The damage to the landscape pattern and character of the Greenbelt would be incalculable.</p> 	<p>In relation to the potential harm to the spatial and visual openness of the Green Belt, LCC is directed to Section 1.6 of the <i>Green Belt Technical Note</i> (REP4-092), which presents the Applicants' assessment of harm to openness and to the relevant Green Belt purposes, alongside other potential landscape and visual impacts during both construction and operation.</p>
<p>REP4-136 136.41</p>	<p>2.12 Viewpoint 4 from field areas along Parrox Lane presents a Visualisation of the Substation as the backdrop to the view, again bringing forward the urban edge and destroying the impression that the Greenbelt provides, with open countryside and long and distant views.</p>	<p>The Applicant notes LCC's description from Viewpoint 4, confirming that the description in <i>Volume 3, Annex 10.3: Visual Baseline Technical Report</i> (APP-126) is consistent with LCC's observations.</p> <p>The Applicants note LCC's position that visual effects would occur from this locality near to the substation sites.</p> <p>The Applicants' assessment recognises the high sensitivity of receptors in this area, making clear in their description the mid-distance and partially open view towards the Morgan onshore substation site, to the southwest, that would experienced by highly susceptibility walkers. Overall, the Applicants assessed that effects would reduce from <i>minor to moderate adverse (not significant) at Year 1 to minor adverse</i> (not significant) at Year 15, following the establishment of mitigation planting as secured within the Outline Landscape Management Plan (oLMP).</p>

Reference	IP submission	Applicants' response
		
REP4-136 136.42	<p>2.13 The remaining View of concern would be that from Viewpoint 2, which was not considered an acceptable location. Rather where Strike Lane meets Lower Lane would be more appropriate. Here the Morecambe Substation would be dominant in easterly views and change the character of the open and rural landscape.</p>	<p>The Applicants note LCC's commentary, reiterating that the locations of the representative viewpoints are appropriate for the purposes of the LVIA, and that the photographic survey was undertaken in accordance with recognised best practice guidance and methodology, reflecting consultation with the EWG, which included LCC. Further details on the agreement reach in this consultation process are set out above in 136.34.</p>
REP4-136 136.43	<p>Summary and Conclusion</p> <ul style="list-style-type: none"> On further site assessment greater visual effects were noted from several of the PRoW to the south of the Morecambe Substation; Of concern are the Ridgeline locations for Substations, which present greater visual emphasis to already large scale, unattractive built form and associated paraphernalia; The ambience and current tranquillity afforded by the current PRoW and Bridleway will be non-existent with the proposed development of the Substations; The extent of damage to the Greenbelt both visually and physically will be considerable by proposing the two Substations in such close proximity. Together they compound the visual effects on the Greenbelt and open countryside and perception of landscape character within. The scale of the 	<p>The Applicants note LCC's summary of its document and their concluding remarks. In response:</p> <ul style="list-style-type: none"> The Applicants note LCC's concluding comment regarding the assessment of the PRoW to the south of the Morecambe Substation and refer to their response above at 136.35. The Applicants note LCC's concluding concerns regarding the ridgeline locations for the substation and refer to their response above at 136.36. The Applicant recognises that development of nationally significant energy infrastructure would inevitably change the local landscape character and experience, affecting, to a degree, the ambience and relative tranquillity of the noted PRoWs. This is acknowledged in the Applicants' LVIA (APP-123). The Applicants therefore contest LCC's remark that "...current tranquillity afforded by the current PRoW and Bridleway will be non-existent..." as a result of the substations. To suggest that tranquillity will be entirely lost is not objective.

Reference	IP submission	Applicants' response
	<p>Morgan Substation is completely at odds with the scale of the landscape.</p> <ul style="list-style-type: none"> • There is little if any evidence that the Applicants have determined site selection to consider harm to the greenbelt visual qualities, or to qualify why the Substations have been proposed within this Greenbelt designation at all. • Even when proposing Substations within the Greenbelt there is little demonstration by the Applicant that there is an understanding of landscape character, demonstrated by the manner in which thin tranches of mitigation planting, crammed in peripheral remnant areas of the Substation Site boundaries present totally inadequate mitigation to the scale of development proposed. • Visually the Proposed Substations extend the urban edge effectively from Lower Lane circa 500m further eastwards and significantly changes the Greenbelt in this location. • NPPF states that NSIP designs should be innovative, this is not demonstrated and from what is detailed to date, there doesn't appear to be any imaginative site specific solutions to the Substation sites being proposed. 	<p>Tranquillity is a <i>relative</i>, context-specific quality rather than an <i>absolute</i> condition. The surrounding landscape in the vicinity of the substations is characterised by pasture and open agricultural fields, but it is also influenced by nearby settlements and the presence of A-roads. These existing components already contribute to the perceptual baseline and will continue to shape how tranquillity is experienced beyond the immediate vicinity of the substations and the associated PRoWs. Accordingly, while a degree of change is acknowledged (as outline above) it is asserted that <i>relative</i> tranquillity would not be wholly lost.</p> <ul style="list-style-type: none"> • The Applicants' note LCC's concluding comment on the <i>extent of damage to the Greenbelt</i>, and in reply, direct LCC to Section 1.6 of the Green Belt Technical Note (REP4-092), which presents the Applicants' assessment of harm to openness and to the relevant Green Belt purposes, alongside other potential landscape and visual impacts during both construction and operation. The Applicants' note LCC's concluding comment on the <i>site selection process (in relation to the Green Belt)</i>, and in reply, direct LCC to Section 1.4 of the Green Belt Technical Note (REP4-092), which presents the Applicants' thorough site selection and design development processes for the Transmission Assets. Matters of agreement and disagreement on this matter are recorded within the SoCG (S_D1_6.1/F03). • The Applicants' note LCC's concluding comment that the substations would <i>extend the urban edge effectively from Lower Lane</i>, and in reply, direct LCC to Section 1.6 of the Green Belt Technical Note (REP4-092), which presents the Applicants' assessment of harm to openness and to the relevant Green Belt purposes, alongside other potential landscape and visual impacts during both construction and operation. • The Applicants note LCC's concluding comments regarding the expectations of the NPPF in relation to <i>good design</i> for NSIPs. The Applicants refer to the interim update to the <i>outline Design Principles</i> document at Deadline 5 based on ongoing dialogue and engagement with the Councils (J3/F02), with a finalised version to be submitted at Deadline 6. This document has been informed and refined through the SoCG process up to Deadline 5 with further development through engagement up to submission of the final oDP at D6.

Table 2.3: RPE4-136 – Response to Appendix B of LCC’s Deadline 4 submission: LLFA Comments (ISH Item 6)

Reference	IP submission	Applicants’ response
REP4-136 136.44	<p>The following comments have been prepared by the Lead Local Flood Authority (LLFA) in advance of the Issue Specific Hearing 2 scheduled to commence on Tuesday, 29 July 2025.</p> <p>6a (1) - Outline Operational Drainage Management Plan - drainage viability: cable depth vs drain depth – explanation and mitigation</p> <p>6a (2) - Outline Operational Drainage Management Plan - risk and preservation of drainage functionality – test on a specific location</p> <p>The Lead Local Flood Authority position on the Applicant's Outline Operational Drainage Management Plan is set out in:</p> <ul style="list-style-type: none"> • Lancashire County Council's Local Impact Report (dated 20 May 2025) • Statement of Common Ground (Document Reference: S_D1_6.1, Rev: F01, dated 20 May 2025) • Written Responses to the Examining Authority's Written Questions (dated 7 July 2025) <p>At present, it is not currently clear what specific issues, concerns, or points of clarification the Examining Authority is referring to under this agenda item or whether any clarification is sought from the Lead Local Flood Authority on this matter.</p> <p>However, should any clarification or further information be sought from the Lead Local Flood Authority on this agenda item, we would be happy to take any questions away and provide a written response.</p>	Noted. A full response to these points is provided below.
REP4-136 136.45	<p>6a (3) - Outline Operational Drainage Management Plan - SuDS standard compliance, standards 6 and 7</p> <p>The Lead Local Flood Authority position on the Applicant's Outline Operational Drainage Management Plan is set out in:</p>	The Applicants have updated the Outline Code of Construction Practice (REP4-026) and the Outline Operational Drainage Management Plan (REP4-064) at

Reference	IP submission	Applicants' response
	<ul style="list-style-type: none"> • Lancashire County Council's Local Impact Report (dated 20 May 2025) • Statement of Common Ground (Document Reference: S_D1_6.1, Rev: F01, dated 20 May 2025) • Written Responses to the Examining Authority's Written Questions (dated 7 July 2025) <p>The Lead Local Flood Authority notes that the Department for Environment, Food & Rural Affairs published new National Standards for Sustainable Drainage Systems on 19 June 2025. These standards were published after the submission of the Applicant's latest Outline Operational Drainage Management Plan.</p> <p>Following discussions between the Lead Local Flood Authority and the Applicant on 4 July 2025 regarding the Hydrology & Flood Risk section of the Statement of Common Ground, it was agreed that both the Outline Code of Construction Practice and the Outline Operational Drainage Management Plan would be updated by the Applicant at Deadline 4 to reflect the adoption of these new standards at detailed design. It is expected that this update will include information on how the Applicant intends to demonstrate compliance with Standards 6 and 7, in addition to Standards 1 to 5.</p> <p>Regarding Standard 6, while the Lead Local Flood Authority has no specific comment to make at this stage, we are aware of a potential overlap with advice from other interested parties regarding onshore ecology and biodiversity, particularly in relation to demonstrating compliance with this standard.</p> <p>Regarding Standard 7, as the surface water drainage schemes presented in the Applicant's Outline Operational Drainage Management Plan are preliminary, it is not yet possible to agree the final details for construction, operation, maintenance, decommissioning, and structural integrity. These details will be subject to change following detailed design and investigation.</p>	<p>Deadline 4 to reflect the adoption of the new SuDS standard compliance at detailed design.</p>

Reference	IP submission	Applicants' response
	<p>While it would be preferable for final drainage details to be submitted in full prior to the grant of consent, we consider the proposed approach to be acceptable in principle. This is on the condition that the relevant requirements are clearly secured within the Development Consent Order, and that the final plans are submitted to and approved by the relevant Local Planning Authority, in consultation with the Lead Local Flood Authority, Environment Agency, and other relevant consultees, prior to the commencement of development.</p> <p>The Lead Local Flood Authority is satisfied that the detailed Operational Drainage Management Plans are sufficiently secured through Requirement 20 of the Development Consent Order (Schedules 2A and 2B), requiring approval by the relevant Local Planning Authority, following consultation with relevant stakeholders including the Lead Local Flood Authority and the Environment Agency.</p>	
REP4-136 136.46	<p>6b - Update on negotiations with interested parties</p> <p>Following receipt of updated Draft Protective Provisions for the Lead Local Flood Authority (received 23 July 2025) further internal discussions took place between the Lead Local Flood Authority and Legal Services on 28 July 2025.</p> <p>Subsequently, Jane Turner (Principal Lawyer – Highways, Planning and Environment) will confirm an updated statement on this matter for use during Hearing 2.</p>	Please refer to the SU Negotiations Tracker (S_D3_10/F03) which contains a statement as to the progress between the parties on the protective provisions for the Lead Local Flood Authority.
REP4-136 136.47	<p>6c - Outline Hydrogeological Risk Assessment of Lytham St Annes Dunes SSSI</p> <p>The Lead Local Flood Authority has no comments to make on the Outline Hydrogeological Risk Assessment of Lytham St Annes Dunes SSSI, as this falls outside the Lead Local Flood Authority's statutory remit and the scope of comments provided by the Lead Local Flood Authority in Lancashire County Council's Local Impact Report.</p> <p>It is noted from the Environment Agency's Statement of Common Ground (Document Reference: S_D1_6.6/F02, Rev: F02, dated</p>	Noted.

Reference	IP submission	Applicants' response
	7 July 2025) that the Outline Hydrogeological Risk Assessment was submitted by the Applicant for review by the Environment Agency. As such, it is considered that the Environment Agency is best placed to comment on this matter during Hearing 2.	

Table 2.4: RPE4-136 – Response to Appendix C of LCC’s Deadline 4 submission: LCC Local Highway Authority Comments (ISH Item 10)

Reference	IP submission	Applicants' response
REP4-136 136.48	<p>1. Highways Impacts</p> <p>1.1. The Local Highway Authority (LHA) comments below provide an update to Section 8 (Highways Impacts) of the Local Impact Report (REP1-085) by Lancashire County Council (LCC) dated 20th May 2025. These include comments on the further information/submissions received by Deadline 3.</p> <p>1.2. The documentation reviewed as part of this response, in addition to the documentation considered as part of the previous response, include:</p> <p>(i) Documentation available to view on the Planning Inspectorate Examination Library:</p> <ul style="list-style-type: none"> - REP2-016 Morgan Offshore Wind Limited and Morecambe Offshore Windfarm Limited J5 Outline Construction Traffic Management Plan (Clean) - Rev F02 - REP2-039 Morgan Offshore Wind Limited and Morecambe Offshore Windfarm Limited S_D2_6 Applicants' Response to Lancashire County Council Local Impact Report - Rev F01 - REP3-009 Morgan Offshore Wind Limited and Morecambe Offshore Windfarm Limited C1 Draft Development Consent Order (Clean) - Rev F05 - REP3-013 Morgan Offshore Wind Limited and Morecambe Offshore Windfarm Limited F1.5.3 Environmental Statement: Volume 1, Annex 5.3: Commitments Register (Clean) - Rev F04 	Noted.

Reference	IP submission	Applicants' response
	<ul style="list-style-type: none"> - REP3-024 Morgan Offshore Wind Limited and Morecambe Offshore Windfarm Limited J8 Outline Highways Access Management Plan (Clean) - Rev F02 - REP3-051 Morgan Offshore Wind Limited and Morecambe Offshore Windfarm Limited S_D2_15 Environmental Statement: Volume 1, Annex 5.4: Commitments Register Schedule of Changes - Rev F02 (ii) Documentation received via email communication: <ul style="list-style-type: none"> - 28th July 2025 Changes to Access A7 <ul style="list-style-type: none"> - Drawing PC1165-RHD-ZZ-XX-SW-TP-0161 Revision P01 - Drawing PC1165-RHD-ZZ-XX-SW-TP-0162 Revision P01 - 24th July 2025 Changes to Access A9 and Introduction of Access A9b <ul style="list-style-type: none"> - Document Notification of Intention to Submit a Change Request Application F01 Dated 23 July 2025 - Drawing PC1165-RHD-ZZ-XX-SW-TP-0008 Revision P03 - Drawing PC1165-RHD-ZZ-XX-SW-TP-0007 Revision P02 - 17th July 2025 Anticipated HGV numbers at Construction Accesses <ul style="list-style-type: none"> - Document / Table - Daily Construction Heavy Vehicles (HVs) to Construction Accesses - 11th June 2025 Applicants Response to Issues pertaining to Highway Accesses <ul style="list-style-type: none"> - Note / Memo – Document PC1165-RHD-XX-XX-ME-X-0002 - 2nd June 2025 Abnormal Indivisible Load Cable Drum Access Report 	

Reference	IP submission	Applicants' response
	<ul style="list-style-type: none"> - Report - AIL Access Report 13.05.25 V2 - 29th May 2025 Abnormal Indivisible Load Transformer Access Report - Report - 24-1220 AIL Access Report 23.05.25 V3 - 28th May 2025 Applicants Response to Issues pertaining to Highway Links - Note / Memo - Document PC1165-RHD-XX-XX-ME-X-0001 - Drawing - Site Visit Road Width Measurements Location Plan <p>1.3. The comments below also have regard to the Issue Specific Hearing 2 (ISH2) and Issue Specific Hearing 3 (IHS3) and comments provided by Mr Stevens (on behalf of the LHA) on 29th and 30th July 2025.</p>	
REP4-136 136.49	<p><u>Key Issues</u></p> <p><i>Project Stages and Duration</i></p> <p>1.4. Previously, a six-day working week (Monday to Saturday 07:00 to 19:00) was being adopted by the applicant for construction works. During ISH3, the applicant confirmed that the draft DCO will be updated to reduce Saturday working hours for the projects from 07:00-19:00 to 07:00-13:00. The LHA request further detail regarding the impacts of this change, and whether it will impact on the duration of the project or intensify daily construction traffic movements.</p>	<p>F3.7.5 Volume 3, Annex 7.5: Construction trip generation assumptions (APP-115) contains the traffic derivation that has informed the traffic and transport maximum design scenario which in turn, has informed the environmental impact assessment contained in F3.7 Volume 3, Chapter 7: Traffic and transport (APP-108). With reference to APP-115, PDF page 45 to page 76 (Morgan monthly vehicle movements) and page 115 to page 146 (Morecambe monthly vehicle movements) it can be noted that the basis for the daily traffic derivation was a 22 day month (equating to 5.5 day week). Therefore, it is noted no change to the intensity or duration of daily traffic as a result of the proposed changes to Saturday working and therefore, the conclusions of the traffic and transport impact assessment remain valid.</p>
REP4-136 136.50	<p>1.5. Paragraphs 1.3.3.1 to 1.3.3.4 of the Outline Construction Traffic Management Plan (oCTMP) (reference: REP2-016) attempt to address the LHA's concerns with regards to HGVs waiting on the public highway prior to the start of construction working hours. However, paragraph 1.3.3.3 states that no vehicles will be permitted to wait or queue on the public highway whilst seeking access to the construction site. This could be misleading as it could be read as only relating to the vicinity of</p>	<p>The Applicants note that LCCs response repeats that provided at Deadline 3. The Applicants would therefore direct LCC to the response to Q16.1.1.11 within Annex 2.4 to Applicants' Response to Deadline 3 submissions from Statutory Consultees and other organisation: Lancashire County Council (REP3-084) (REP4-098).</p> <p>In summary, this response outlines that the Applicants do not share LCCs interpretation of wording in regard to working hours or the need to define parking</p>

Reference	IP submission	Applicants' response
	<p>the access and not having regard to the full journey from the original location. This issue is further described in paragraph 1.3.3.5, and its current wording dismisses the integrity of paragraphs 1.3.3.1 to 1.3.3.4, as it allows HGVs to access the sites at any time, without any prior agreement with or notice to the LHA. As described in paragraph 1.3.3.4 of the oCTMP, it is critical that locations are agreed that allows vehicles to safely wait on land which is in the applicant's control or in locations that have the support of the LHA. To overcome risk, as indicated by Mr Stevens during ISH2, it is suggested that locations are agreed in principle at this stage, to ensure they are locally available and practical to be used, to safely manage the situation.</p>	<p>locations (pre-determination). Notwithstanding, in the interests of progressing matters, the Applicants have included updates as part of wider amendments to the outline Construction Traffic Management Plan (oCTMP) at Deadline 4 (REP4-056) to clarify these matters. Notably, the oCTMP has been updated to define waiting locations and explicitly state that the parking and waiting restrictions apply to all highways (not just within the extents of the accesses).</p> <p>The Applicants consider that these changes address all LCCs comments and these matters should now be agreed by LCC. Should LCC have further comments on the updated oCTMP the Applicants remain committed to trying to resolve and discuss these matters but would note that following Deadline 4, the Applicants have been unable to secure a meeting with LCC until the 18 September 2025 affording little time to provide updates for Deadline 5. Notwithstanding, at a meeting with LCC on the 18 September 2025 it was agreed between the parties to hold bi-weekly meetings to discuss the residual matters with an aim of providing any minor updates to the oHAMP and oCTMP at Deadline 6. The Applicants would reiterate however, that the issues being raised by LCC at D4 continue to relate to matters of detail that could be typically addressed post consent as part of developing detailed CTMP(s) and outline Highway Access Management Plans (oHAMPs).</p>
<p>REP4-136 136.51</p>	<p><i>Compound Accesses</i></p> <p>1.6. The LHA have reviewed the proposed construction accesses and their locations to identify whether the accesses proposed are safe and suitable. The LHA's conclusions are based on relevant criteria. A description of the review criteria is provided within the LHA's Local Impact Report (reference: REP1-085), paragraphs 8.17 to 8.33. Table 1.1. below outlines the accesses that are not currently acceptable (in principle) to the LHA. The LHA's current position on each access proposal is based upon the documentation listed under paragraph 1.2 above. An overview of the existing issues pertaining to each access is provided within the 'General notes and column specific comments' column. The table below highlights those accesses that are currently not acceptable to the LHA.</p>	<p>The Applicants would reiterate 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 all comments received from LCC; these have been discussed across multiple meetings and the Applicants understood that all matters were resolved. These updated outline designs are contained within the latest revision of the outline Highway Access Management Plan (REP4-061). The Applicants have also provided all information to LCC in regard to proposed level of use of each access and crossing and numbers of non-motorised users.</p> <p>The Applicants however note that LCC have provided additional comments upon matters and locations where the Applicants understood agreements had been</p>

Reference	IP submission	Applicants' response
REP4-136 136.52	<p><u>Summary of Proposed Accesses Review</u></p> <p>1.7. Positive progress has been made on the proposed accesses. There are currently 16 accesses that are not considered acceptable in principle to the LHA at this stage. As indicated by Mr Stevens in ISH2, the LHA consider all accesses can reach a position of being acceptable in principle, but this stage has not yet been reached.</p> <p>1.8. For the avoidance of doubt, the delivery mechanism for all works on highway maintainable at public expense including accesses will be under S278 of the Highways Act.</p> <p>1.9. The LHA has requested anticipated HGV numbers at each proposed access. As indicated by Mr Stevens in ISH2, whilst this information has been provided to the LHA, it does not include haul road crossing points, which are required at this stage. The LHA await this information. The LHA will provide further comment on the suitability of the haul road crossing points after this information has been provided and reviewed.</p>	<p>reached. The Applicants have provided a detailed response to all matters raised by LCC in response and have agreed with LCC (at a meeting on the 18 September 2025) to a workshop to discuss the residual matters, with an aim of providing any minor updates to the outline Highway Access Management Plan at Deadline 6.</p> <p>The Applicants position is that the design of all accesses has progressed to (beyond) a level where the LCC "safe and suitable" test stated in their LIR (REP1-085) and repeated in (AS-082) has been satisfied and there should be no impedance to the proposals being "agreed in principle".</p>
REP4-136 136.53	<p>1.10. The applicant has confirmed some changes to the Access to Works Plan will be submitted at deadline 4. The LHA have identified additional changes to the Access to Works Plan that should also be made. The following accesses are currently shown as Highway Access Points and Haul Route Crossing Points, but need to be updated to Haul Route Crossing Points only: - TAT_MG_10 - TAT_MC_13 - TAT_MG_23 - TAT_MG_45 - TAT_MG_11 - TAT_MC_21 - TAT_MG_24 - TAT_MC_46 - TAT_MC_12 - TAT_MC_22 - TAT_MG_44 - TAT_MC_47</p> <p>1.11. In addition, the applicant has confirmed that Access A20 is no longer proposed. Therefore, TAT_MG_20 should be removed. Further clarification on whether TAT_ECO_MG_3 and TAT_ECO_MGMC_4 will be used by HGVs is required, as the LHA have been unable to locate proposals for these accesses. The location of TAT_MGMC_57 needs to be amended.</p>	<p>With regard to the crossings, the Applicants would note that the term 'Access' within the Access to Work Plan (APP-157) and draft DCO (REP4-007) is used to refer to different forms of access from the highway, these include: locations where construction vehicles would take access directly from the highway to the Order Limits (and vice versa); and crossing locations where construction vehicles will use accesses to cross over from one side of the Order Limits to the other side via the highway (referred to in the outline Highway Access Management Plan as crossings). The form and design of each access and crossing is defined in the outline Highway Access Management Plan (oHAMP) (REP4-060). Outline designs for all locations are shown in the oHAMP and the requirement to agree the final designs with LCC is secured by Requirement 10 of the draft DCO (C1/F07). The Applicants therefore consider there is adequate clarity of access function provided and do not consider there is a need to amend the Access to Works Plan (and accompanying DCO).</p> <p>The Applicants would clarify that TAT_ECO_MG_3 and TAT_ECO_MGMC_4 are existing farm accesses and are proposed for use by limited numbers of</p>

Reference	IP submission	Applicants' response
		<p>vehicles associated with the delivery of Ecological Mitigation Works. These works are described in section B2.2.2 and B2.2.3 of the Outline Ecological Management Plan (EMP) (REP4-058) and paragraph 3.18.3 of the Project Description provides details on traffic forecasts: <i>“Vehicle activity levels for construction are expected to be low-level and place or intermittent (i.e. for the periods over which the mitigation is being put in maintained (if relevant)”</i>.</p> <p>The Applicants clarify that the proposals aim to reuse materials onsite and as such the nature of these works are such that vehicle movements are expected to be limited, e.g. the delivery of plant and welfare and the day to day movement of limited contractor vehicles, e.g. 4x4 vehicles, i.e. similar to the existing farm use. Requirement 12 of the draft DCO (REP4-007) requires that the final detailed EMP is agreed with the relevant planning authority.</p> <p>With regard to TAT_MG_20 and TAT_MGMC_57 (B11/F02) the Applicants propose to provide a consolidated Access to Works Plan at Deadline 6 to capture these minor amendments as well as changes resulting from the Change Request.</p>
REP4-136 136.54	<p>1.12. The LHA have concerns with the use of the Guild Wheel by construction traffic as highlighted by Mr Stevens in ISH2. There do appear to be alternatives that would negate the use of the Guild Wheel. The LHA request clarification as to the need of TAT_MGMC_57 to cross the Guild Wheel, when TAT_ECO_MGMC_6 is proposed. The LHA are currently awaiting further information regarding the current non-motorised use of the Guild Wheel. The applicants are still considering the LHA's concerns and alternatives.</p>	<p>The Applicants have expressed a willingness to work with LCC to find proportionate solutions to traffic concerns/clarifications. Noting that LCC continue to express concerns with the use of the Guild Wheel (with detailed mitigation measures) the Applicants have engaged with the engineering team and developed an alternative access strategy, allowing the removal the access over the Guild Wheel. The removal of this access is reflected in updated to the outline Construction Traffic Management Plan (J5/F04) at Deadline 5.</p> <p>To access the section on onshore export cable corridor south of the A583 toward the River Ribble, two points of construction accesses were proposed within the outline Highway Access Management Plan, accesses 57 and 58. The Applicants propose that access 57 (over the Guild Wheel) will be removed with access 58 providing the main point of access to this section of onshore export cable corridor. It is proposed that traffic will travel to access 58 and then travel north along the temporary haul road to access the section of onshore export cable corridor south of the A583 that would have been served by access 57.</p>

Reference	IP submission	Applicants' response		
REP4-136 136.55	<p><i>Routing Strategy</i></p> <p>1.13. The LHA have reviewed the information provided pertaining to the proposed highway routes to be used by construction HGVs to identify whether the routes are safe and suitable for use by HGVs. As with the detailed review of construction accesses, the LHA's conclusions are based on relevant criteria. A description of the review criteria is provided within the LHA's Local Impact Report (reference: REP1-085), paragraphs 8.55 to 8.69. Table 1.2. below outlines the LHA's current views on each route based upon the documentation listed under paragraph 1.2 above. An overview of the existing issues pertaining to each link is provided within the 'General notes and column specific comments' column. The table below highlights those accesses that are currently not acceptable to the LHA.</p>	<p>The Applicants 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 detailed CTMPs in agreement with LCC. The commitment to producing final detailed CTMP(s) is secured by Requirement 9 of the draft DCO (REP4-007).</p> <p>To provide further assurance, the Applicants have submitted a detailed technical note and supporting plans to LCC following Deadline 4 (submitted for record to the examination as an Appendix A of this response). This note collates all the detail requested by LCC, and satisfies the review criteria provided within the LHA's Local Impact Report (reference: REP1-085). The table below provides further details of the Applicants' position.</p>		
REP4-136 136.56	<p><u>Summary of Proposed Routing Strategy</u></p> <p>1.14. There are currently 13 highway links that are not considered suitable for two-way HGV working as proposed. Whilst the oCTMP provides generic solutions to issues, Table 1.2 above provides reasonings as to why the generic solutions cannot be accepted as presented, without key detail. Any proposed solutions to the highway links must be deliverable and an understanding of the operation of the solution is required at this stage.</p> <p>1.15. There is still an area of disagreement with regards to which links are considered unsuitable. The applicants have maintained their position of highway links with carriageway width of greater than 5.5m to be suitable for 2-way HGV movements. The LHA do not agree with this. Whilst the LHA have requested swept path analysis of links to identify their suitability and the extent of constraints, which currently has not been provided, there are swept paths on short sections of some links (in the vicinity of the accesses, as swept paths were provided for the accesses). These swept paths show that in locations, carriageway width greater than 6.0m can be unsuitable for 2-way HGV movements. Further room for manoeuvre is required at bends in the road. The</p>	<p>In summary this note outlines link specific mitigation strategies and demonstrates that mitigation measures are deliverable for all routes under discussion. The Applicants have met with LCC for the 18 September 2025 <u>to discuss this note and have agreed to a series of bi-weekly workshops with the aim of trying to agree more detailed link by link specific mitigation strategies. The Applicants are hopeful that this commitment to increased level of dialog will allow the parties to work collaboratively to agree where mitigation is required and the acceptability of mitigation proposals.</u></p> <p>The Applicants expectation is that this further detail and commitment to further dialog will be sufficient to allow LCC to agree in principle and defer any further detail post determination (as part of the final detailed CTMPs in secured by Requirement 9 of the draft DCO (REP4-007)).</p> <p>Response to LCC safe and suitable criteria</p> <table><tr><td>NCC LIR criteria</td><td>Applicants' response in technical note</td></tr></table>	NCC LIR criteria	Applicants' response in technical note
NCC LIR criteria	Applicants' response in technical note			

Reference	IP submission	Applicants' response		
	applicants do currently have localised carriageway widths which could be used to validate Ordnance Surveys to conduct swept path analysis on.			
REP4-136 136.57	1.16. As indicated by Mr Stevens in the ISH2, each link has its own constraints, which should be safely managed and mitigated to the satisfaction of the LHA. The sections of highway that require mitigation have not yet been agreed and currently there is no certainty that mitigation yet to be proposed is deliverable within land controlled by the applicant or the LHA. The deliverability and whether the principles of the generic mitigation can operate at specific locations is yet to be presented. The LHA are currently awaiting results of the non-motorised user surveys that will enable a greater understanding of safety and any additional issues that will need addressing as a consequence of additional HGV's using the network.	A. Approximate width of the existing (usable) carriageway (excluding parking bays and cycleways) (taken from Mapping software).	The width of the carriageway has been measured on site at regular intervals and documented. In addition, the width of the highway envelope has been captured, i.e. carriageway + verges (within which widening or oversail can be accommodated).	
		B. 2027 Base daily HGV flows (taken from Table 7.21 of ES Volume 3, Chapter 7).	The technical note consolidates traffic data from the application documents to set out link specific baseline HGV flows to contextualise the impact of the Transmission Assets HGV demand on current highway operations.	
REP4-136 136.58	1.17. As indicated by Mr Stevens in ISH2, the LHA are not requesting the detailed design (for construction purposes) for highway links at this stage, rather the principal of details that ensure there is a deliverable and workable solution for the constraints on links. The LHA is willing to work with the applicant to find suitable mitigation. This can only commence on the provision of further information that is yet to be provided. 1.18. For the avoidance of doubt, the delivery mechanism for all works on highway maintainable at public expense including construction vehicle routes will be under S278 of the Highways Act.	C. Peak daily construction HGV flows (taken from Table 7.21 of ES Volume 3, Chapter 7).		
		D. Simultaneous 2-way HGV movement can be accommodated on the link.	The technical note sets out where 2-way HGV movements can be accommodated on the links, quantifies the length of link where this can be achieved and prescribes link-specific solutions where not.	

Reference	IP submission	Applicants' response		
			<p>E. Swept Path Analysis provided for the route.</p>	<p>Swept path analysis (SPA) is a indicative tool when used with ordnance survey (O/S) mapping layers to determine mitigation (as sometimes presented in application documents). The documented regular width measurements (outlined in the response to criteria A) are a more granular tool for determining scope and scale of any highway link specific mitigation measures. SPA would be more appropriately employed to microsite mitigation and inform detailed geometry as part of the design process to be contained in the detailed final CTMP (as secured in the secured by Requirement 9 of the draft DCO (REP4-007)).</p>
			<p>F. Pedestrian, cyclists and equestrian demand identified.</p>	<p>Non-Motorised User Surveys have been undertaken following agreement of the scope with LCC. The outputs are documented in the technical note.</p>
			<p>G. Overrun does not occur; Sufficient waiting areas along the route.</p>	<p>The technical note details the link specific mitigation strategies that could be delivered; i.e. the note outlines locations where the road is currently too narrow for HGVs to pass and identifies that there is space within the highway envelope to provide widening/passing places.</p>

Reference	IP submission	Applicants' response		
		H. Link not susceptible to surface water flooding.	This criterion has not been raised as a material consideration in engagement with LCC or the documented review of link concerns detailed in LCC Post hearing submissions including written submissions of oral cases (REP4-136).	
REP4-136 136.59	<p><i>Outline Construction Traffic Management Plan</i></p> <p>1.19. Currently, the oCTMP (reference: REP2-016) proposes a booking system for deliveries to the sites in order to monitor HGVs, and to ensure compliance with the assessed maximum design scenario for HGV trips presented within Table 7.21 of Volume 3, Chapter 7: Traffic and transport of the ES (reference: APP-108). Table 7.21 of APP-108 presents peak daily construction traffic flows on the highway links. At this stage, insufficient information has been presented on how monitoring will be undertaken on individual links.</p> <p>1.20. Whilst the LHA have been provided information regarding average and peak HGV numbers at some accesses (haul road crossing points number yet to be provided), this information should be included within the oCTMP, and be used to limit contractors and the applicant (to the maximum HGV numbers). While the LHA understand that proposals are subject to change when a contractor is secured, the LHA suggest that the average and peak numbers are provided at this stage, with a view to amend once the contractor is secured. The peak movements are not expected to change as the applicant has suggested that the maximum design scenario has been assessed.</p>	<p>The Applicants note LCCs comments in regard to monitoring and would direct LCC to section 1.15 of the outline Construction Traffic Management Plan (oCTMP) (REP4-056) which includes details of monitoring measures.</p> <p>The Applicants clarify that details of HGV movements to all accesses and at each crossing have been provided to LCC. These numbers represent the peak number to the access, however, the nature of construction is that not all accesses will operate at peak at the same time. For example, on linear projects it is typical that different accesses will have their peaks at different times, as such these numbers could be misleading if included in the CTMP as a target as cumulatively they would exceed the assessed maximums on some links (where numbers are derived by considering the overlap of activities). The oCTMP (Section 1.15.2) instead sets out compliance with the daily HGV trips per link as a monitoring metric. This approach would therefore ensure that HGV movements per link are not exceeded and intrinsically manages access demand.</p>		
REP4-136 136.60	1.21. The oCTMP currently contains generic control measures to manage constraints on links and accesses. However, as indicated by Mr Stevens in the ISH2, each link is subject to its own unique constraints. The mitigation as currently presented has not been demonstrated to be sufficient or deliverable. Below, the LHA provide comments on the current proposals within the	The Applicants refer to REP4-136 136.55 above.		

Reference	IP submission	Applicants' response
	<p>oCTMP, and the deficiency with that currently proposed (oCTMP paragraph number and comments in italics):</p> <p><i>1.9.1.3 To minimise the potential for driver delay, and road safety concerns at these locations, it would be proposed to provide localised traffic management measures. A range of mitigation measures are proposed that could be adopted including:</i></p> <ul style="list-style-type: none"> <i>• Using mobile traffic management, such as an escort / pilot vehicle to guide HGVs along roads and manage oncoming traffic;</i> <p>LHA Comment: Escorting HGVs will require locations for holding/arranging HGVs, which have not been presented.</p> <ul style="list-style-type: none"> <i>• Use of temporary traffic signals at pinch points to control two-way traffic movements;</i> <p>LHA Comment: Locations of such traffic signals have not been provided. Solution may not be deliverable within highway when regard is had to safety, swept path requirements, visibility and stopping sight distance. Impacts of the signals are not presented</p> <ul style="list-style-type: none"> <i>• The provision of localised passing areas and widening at pinch points.</i> <p>LHA Comment: Locations of passing places (within deliverable land), visibility, etc., have not been provided and may not be deliverable within highway when regard is had to safety, swept path requirements, visibility and stopping sight distance.</p>	
<p>REP4-136 136.61</p>	<p><i>1.9.1.5 To minimise the potential for driver delay, and road safety concerns along these narrow links, a range of mitigation measures are proposed that could be adopted including:</i></p> <ul style="list-style-type: none"> <i>• Improving/ formalising existing passing areas;</i> <p>LHA Comment: No evidence currently to suggest the existing passing places are sufficient (in quantity, manoeuvrability, visibility).</p> <ul style="list-style-type: none"> <i>• Using mobile traffic management, such as:</i> <ul style="list-style-type: none"> <i>- An escort / pilot vehicle to guide HGVs along roads and manage oncoming traffic;</i> 	

Reference	IP submission	Applicants' response
	<p>LHA Comment: Escorting will require locations of holding/arranging HGVs, which have not been presented.</p> <p>- <i>'Stop-works' signage to hold traffic back (for up to two minutes in any 15 minutes) whilst HGVs travel along routes; or</i></p> <p>LHA Comment: Locations of such signage has not been provided. Location of where traffic would be held not provided and solution may not be deliverable when regard is had to safety, swept path requirements, visibility and stopping sight distance. Impacts of the strategy are not presented.</p> <p>- <i>'Temporary obstruction' signage to hold traffic (for up to 15 minutes with a subsequent gap of at least one hour) whilst HGVs travel along routes.</i></p> <p>LHA Comment: Locations of such signage has not been provided. Location of where traffic would be held not provided and solution may not be deliverable when regard is had to safety, swept path requirements, visibility and stopping sight distance. Impacts of the strategy are not presented.</p>	
REP4-136 136.62	1.22. As indicated within the review of the proposed links above, the mitigation must be specific to the constraints on the link, and the applicant should provide sufficient evidence that the mitigation can be delivered.	
REP4-136 136.63	<p><i>Road Condition Monitoring and Maintenance Strategy and changes to layout of highway</i></p> <p>1.23. Within the oCTMP (reference: REP2-016) section 1.11.3, the applicant proposes to offer a contribution towards highway remediation or to deliver any required works. At this stage, it is important to agree the principle as to how legally maintenance will be undertaken / contributions be made. There is much to be agreed on this matter, and the proposed principles have not been discussed in detail with the LHA to date.</p> <p>1.24. It is important that risks are appropriately managed for both the LHA and the applicant. It is encouraging that the applicant supports the funding of the LHA's resource to assist in managing</p>	<p>The Applicants refer LCC to paragraph 1.13.3.10 of the outline Construction Traffic Management Plan (oCTMP) (REP4-056) which outlines that:</p> <p><i>It is proposed that the final form of agreement between the Applicants and the relevant highway authorities would be via a Section 278 Highways Act 1980 agreement, unless agreed otherwise. Provision will also be made for any reasonable costs incurred by the relevant highway authorities in administering the Transmission Assets impact on the highway network and any necessary remedial action.</i></p>

Reference	IP submission	Applicants' response
	<p>the proposed construction routes as a consequence of the projects, to best ensure they remain open (cannot be guaranteed).</p> <p>1.25. The delivery mechanism for any works temporary or permanent on highway maintainable at public expense (including, and not limited to, pre-commencement, abnormal indivisible load movements, delivery of maintenance work etc.) will be under S278 of the Highways Act, unless otherwise agreed with the LHA. This matter is yet to be discussed or agreed.</p>	
<p>REP4-136 136.64</p>	<p><i>Highways Impacts Summary</i></p> <p>1.26. There are areas where the County Council has significant concerns that are currently unresolved that have been highlighted in the above section, including:</p> <ul style="list-style-type: none"> - 16 construction accesses; - 13 highway links proposed to be use by HGVs; - Use of the Guild wheel by any motorised traffic; - Outline construction traffic management plan; and - Delivery of works (temporary and permanent) including maintenance to the highway network and any infrastructure removed to support abnormal load movements. <p>1.27. Until all these matters any other consequential matters impacting upon the highway or other "topic areas" are resolved to the LHA's satisfaction, the LHA cannot offer support for the application. As indicated by Mr Stevens in ISH2, the LHA is willing to work with the applicant to best overcome the issues. However, as of midday 7th August 2025, the LHA are awaiting invitations to topic related workshops.</p>	<p>The Applicants have provided a detailed response to all points raised by LCC and consider this demonstrates the significant work that has been undertaken to try and address the points of detail raised by LCC.</p> <p>It is noteworthy that all matters raised by LCC above relate to areas that are managed/secured through commitments within the outline Construction Traffic Management Plan (oCTMP) and outline Highways Access Management Plan (oHAMP) and further revisions and detail (if required) would therefore be discussed and agreed as part of the Requirement discharge process.</p> <p>The Applicants remain committed to trying to resolve and discuss these matters with LCC but would note that following Deadline 4 LCC have been unable to offer any dates to discuss matters prior to the 18 September 2025 affording no time to update documents for Deadline 5. Recognising these concerns, at a meeting with LCC on the 18 September 2025 it was agreed between the parties to hold bi-weekly meetings to discuss the residual matters with an aim of providing any minor updates to the oHAMP and oCTMP at Deadline 6.</p> <p>The Applicants would reiterate that the issues being raised by LCC at D4 continue to relate to matters of detail that can and should be addressed post consent as part of developing detailed CTMP(s) and HAMP(s).</p>

2.2 Lancashire County Council – Deadline 4 Additional Submission

Table 2.5: AS-082 – Response to LCC’s Deadline 4 Additional Submission

Reference	IP submission	Applicants’ response
1.1	<p>Introduction</p> <p>The following sets out Lancashire County Council’s Deadline 4 additional submission in relation to landscape matters for the Development Consent Order for the Morecambe Offshore Windfarm Transmission Assets Generation Assets (‘the Scheme’). The submission has been made following the Issue Specific Hearings (ISH) of 29th and 30th (ISH2) and 31st July 2025 (ISH3).</p>	The Applicant welcome LCC’s additional Deadline 4 submission and their written representations.
1.2	The County Council submitted its main Deadline 4 submission on the 8th August 2025. The additional submission which is included as Appendix A to this report, comprises a Landscape and Technical Note.	The Applicants acknowledge the additional submission and has responded accordingly below.
1.3	The County Council understands that the applicants have submitted a revised Greenbelt Technical Note since ISH2 and ISH3. The County Council consequently envisages the submission of a further additional submission in response to the applicant’s submission of the revised Green Belt Technical Note, once it has had the opportunity to consider this.	The Applicants note LCC’s intention to submitted additional representations on the updated Green Belt Technical Note (REP4-092) and will welcome their commentary in due course.
1.4	<p>Appendix A - LCC Deadline 4 Additional Submission on Landscape (ISH Item 2)</p> <p>RESPONSE TO LANDSCAPE MATTERS; relating to the Inspector’s request for Comments on Landscape Technical Note (07 July 2025) at Item Specific Hearing 2 (ISH2) Planning Hearing 29th July 2025, by LCC Landscape Architect</p> <p>LANDSCAPE COMMENTS</p> <p>Introduction</p>	The Applicant acknowledges LCC’s submission is to be read in conjunction with comments from FBC Landscape Architect.

Reference	IP submission	Applicants' response
	This document makes reference to the above document. It should be read in conjunction with comments from FBC Landscape Architect.	
1.5	Comments Ref 1.2.3.3 of the document references tree replacements being like for like. N.B. where trees to be removed may be Ash (with dieback) these to be replaced with Quercus robur (Oak).	The Applicants acknowledges LCC's recommendation regarding the tree replacement strategy, which is reflected in the update to the <i>outline Landscape Management Plan</i> (J2/F04) for Deadline 5.
	Ref 1.2.3.5 Any approved scheme to include full Landscape Drawings (in accordance with JCLI (Landscape Institute) stages of work), as well as a written documentation for approval.	The Applicants note LCC's statement that any approved scheme should include " <i>full landscape drawings</i> ". The Applicants confirm that all documentation submitted to the discharging planning authority, for the purpose of discharging the relevant requirements, will be prepared in accordance with best practice standards. This will be informed by consultation with the relevant local planning authority to ensure that all submissions meet the requisite standards for a project of this nature.
	Ref 1.2.3.8, 1.2.4.5, 1.2.5.5, 1.2.6.10, 1.2.8.8 and 1.2.9.7. The Applicant makes repetitive claims (as quoted) within the document, that LCC Landscape had a meeting to discuss 'landscape matters' and 'the design process'. Whilst this may have been the intention, at this meeting the Applicant focussed discussions on Greenbelt issues for the majority of the meeting. Only circa 10 minutes of an approximate hour long meeting contained landscape issues. Landscape matters have therefore not been discussed in any detail to date. It is misleading to repeatedly document in this manner and misinform the process.	The Applicants note LCC's comments regarding the level of detail discussed between the parties to date at the meeting held on 18 June. While the Applicants acknowledge that LCC has fairly reported the timings of topics discussed, they strongly refute any suggestion that the subsequent reporting of this in their Deadline 3 submission was intended to " <i>misinform the process</i> ." The Applicants' approach to the meeting with LCC was based on a reasonable judgement of which matters would be most beneficial to prioritise at the outset of the SoCG process, having regard to the content of LCC's written representations at that stage. Up to 18 June, the Applicants considered that Green Belt matters – repeatedly raised in LCC's submissions – should be addressed first. By contrast, LCC's written representations on " <i>landscape matters</i> " were more clearly articulated and the Applicants, therefore, considered they had a clearer understanding of the additional information required. This subsequently informed the preparation and submission of the <i>Technical Note: Landscape and Design Matters</i> (REP3-064), which intended to alleviate the initial concerns expressed by LCC (and other parties).

Reference	IP submission	Applicants' response
1.6	<p>Ref 1.2.5.2 notes that only at Detail Design are matters regarding levels / profiles agreed. Albeit the finite detail may be agreed at Detail Design, fundamentals need to be agreed. It is otherwise not acceptable to state this, given the size and scale of the built forms proposed. There is a reliance here on the flexibility afforded to Infrastructure projects, rather than best practice of what would be provided for any other large scale project. This manner of information would otherwise be provided upfront, to help satisfy Planning Authorities that Proposals confer with 'Good Design'. It is impossible to enable Planning Authorities to guide this process, to propose sustainable solutions to what is a totally inappropriate development in the greenbelt, in such a sensitive location. It is essential to agree these principles at this stage, as opportunities would not be forthcoming at a later stage in the process.</p>	<p>The Applicants reaffirm to LCC that its consenting strategy is in accordance with the well-established approach for NSIPs, being based on <i>Advice Note Nine: Rochdale Envelope</i>. This approach, alongside the submitted project commitments and design principles / codes, secures the parameters (or 'fundamentals') for the Transmission Assets through the EIA process.</p> <p>The Applicant reiterate that the Maximum Design Scenario defines the maximum construction, operational and decommissioning parameters of the Transmission Assets. These onshore construction parameters are secured under Requirement 5 of Schedules 2A and 2B of the dDCO (REP4-007), which subsequently ensures that the substations cannot exceed the assessed parameters. This approach allows the assessment of a realistic worst-case scenario while retaining flexibility for detailed design to be informed by ongoing consultation and the design governance process secured in the dDCO.</p> <p>For a NSIP, the approach outlined above clearly set out the 'fundamentals' of the proposed development and accords with best practice for large scale project of this nature. The Applicants stand by their approach, additionally referring to the additional information they have submitted during the Examination in support of stakeholders' written representations, requests and queries.</p>
1.7	<p>Ref 1.2.5.3 The only manner to check this would be to commission specific landscape consultants to check this process is correct, as has been noted previously. The timescale of this process does not allow this. If a GL (Ground Level) isn't known how can a photomontage be created? If it is known just state it-be honest.</p> <p>Ref 1.2.5.4 See 2.15-18 below.</p>	<p>The Applicants reaffirm that all submitted visualisations have been produced in accordance with the Landscape Institute's <i>Technical Guidance Note 06/19: Visual Representation of Development Proposals</i> (2019), presented as Type 3 visualisations. As stated in the best practice guidance (page 19), this type of visualisation represents "...<i>design, form and context to a reasonable degree of objectivity and accuracy, one which can be understood and relied on by competent authorities and others.</i>" [emphasis added by the Applicants].</p> <p>The Applicants acknowledges the limitations of visual representation in Section A.1.5 of Volume 3, Annex 10.4: Landscape and Visual Impact Assessment Methodology (APP-127).</p> <p>The Applicant also confirm that the visualisation produced where undertaken by a qualified and competent professional who specialises in visualisations of this nature.</p>
1.8	<p>Ref.1.2.6.2-5 Note that the purpose and importance of the recommended off site planting is not just for residents, but for users of the various PRow's and for the benefit of businesses,</p>	<p><u>Off-site planting</u></p>

Reference	IP submission	Applicants' response
	<p>which rely and depend on attractive views for their commercial asset (Norcross Caravan Park).</p> <p>Equally it is considered that the site area alone is of insufficient size to enable adequate mitigation, hence the recommendation for off-site planting. The Applicant states (1.2.6.5), that the siting of the substations and mitigation is located to minimise landscape and visual effects. This seems unlikely, otherwise why would a Greenbelt location be selected, it has obvious benefits and attributes over an area of open countryside without this designation and the Greenbelt here works alongside an adjacent Area of Separation. It is questioned whether adequate mitigation could ever be sufficient in terms of Landscape Character. The Proposed Development would irretrievably change the open green appearance and long views and small scale intimate landscape which currently exist.</p>	<p>The Applicants recognise that LCC's proposals for off-site planting reflects their objective to protect the visual amenity of residents and business beyond the Transmission Assets' Order Limits. However, as with all planning applications (whether NSIPs or otherwise), it is not within the Applicants' ability or remit to promote or secure planting or mitigation measures beyond the defined Order Limits.</p> <p>The scope of the EIA and the parameters secured through the draft DCO are legally and procedurally confined to land within the Order Limits. Off-site works would fall outside this statutory framework and require separate agreements or consents from landowners and the local planning authority. This approach is typical of, and consistent with, established practice for NSIPs, where mitigation is designed and secured within the Order Limits to ensure deliverability, enforceability, and compliance with the Rochdale Envelope.</p> <p><u>Planting strategy</u></p> <p>In response to LCC's commentary about the "<i>Narrow bands of proposed planting...</i>" the Applicants reaffirm their position, as set out in Section 1.3.2 of the oLMP (J2/F04), that the principal objective of the proposed landscape strategy is to integrate, filter and/or screen views of the onshore substations. It is clarified that the proposals do not seek to achieve complete screening of the substations, but rather to provide appropriate visual mitigation that reflects the receiving landscape context.</p> <p>The Applicants further note that the final species selection and design will be confirmed and secured through the detailed Landscape Management Plan(s) in accordance with Requirement 6 of the draft DCO (REP4-007), to be prepared and agreed with the relevant planning authority as part of the discharging of requirements post-consent once the final design of the substations has been finalised. This will follow consultation with the relevant officers of the local planning authority responsible for discharging the associated requirement.</p>
1.9	<p>Ref 1.2.6.8 The Applicant accepts that fully mitigating the proposed Substations is unfeasible, but it is disagreed, that mitigation as is stated, 'reflects the receiving landscape context'. In plain English... the Applicant has not demonstrated how the proposed Substation and mitigation has and can 'reflect' the 'receiving' (existing) 'landscape context' (Landscape Character).</p>	<p>The Applicants acknowledge that, by their nature, the substations represent a form of development that cannot be entirely mitigated within the receiving landscape. However, the Applicants do not agree with the statement that the proposed mitigation does not respond appropriately to the existing landscape context.</p>

Reference	IP submission	Applicants' response
	<p>Please clarify how openness and green open agricultural fields are retained, how mitigation in terms of tree planting reflects the small woodland blocks.</p> <p>How small scale intimate agricultural landscape is retained?</p> <p>Reflect in this context means 'think deeply about' or echoes?</p> <p>It might 'think' about the landscape character but this scale of this urban development does not echo it.</p>	<p>The landscape strategy has been guided by the defined objectives of the oLMP (J2/F04), which identifies the integration of new development with existing landscape character as a primary objective. These objectives cascade through Project Level Design Principles and Design Codes (of the oDP, J3/F02) to support of their delivery. The Principles and Codes are then reflected in proposed Compliance Report, prepared by the Applicants which would accompany the Requirement submission.</p> <p>In this respect, the proposals are designed to provide a setting that manages the effects of the onshore elements – particularly the substations – by responding to adjacent land uses and the wider landscape character.</p> <p>It is important to clarify that “<i>reflecting</i>” the receiving landscape does not imply a literal replication of features such as openness or field pattern. Rather, it refers to ensuring that mitigation is contextually appropriate in scale, form and character, consistent with the established principles of landscape design and assessment.</p> <p>The Applicants consider that the reference to ‘reflecting existing landscape character’ requires the proposed design and embedded mitigation to be contextually responsive. This entails ensuring that the scale, form and materiality of built elements appropriately respond to their setting, while recognising that these will introduce new features into the landscape. In addition, the selection of planting species and the arrangement of planting layouts should be characteristic of the local context and consistent with recognised landscape character guidance. The following is identified for the Coastal Plain character area, which encompasses the Fylde Coastal Plain Landscape character area 15d within which the substation sites lie. These elements of guidance are embedded in the updated Design Principles and Code (of the oDP, J3/F02) to support appropriate landscape character response:</p> <ul style="list-style-type: none"> • Conserve distinctive field patterns and related landscape features and landforms: <ul style="list-style-type: none"> – ‘<i>encourage retention and enhancement of hedgerows and hedgerow trees</i>’ – ‘initiate programmes of tree planting, particularly on the fringes of settlements and in locations where trees will help to screen infrastructure and other developments’

Reference	IP submission	Applicants' response
		<ul style="list-style-type: none"> • Conserve remnants of former agricultural habitat mosaics: <ul style="list-style-type: none"> – 'protect and conserve wet and other semi-natural agricultural grasslands' • Enhance the distinctive character and landscape setting of rural settlements <ul style="list-style-type: none"> – 'retain existing field boundaries and use as a framework for new development' • Enhance landscapes associated with major infrastructure developments....: <ul style="list-style-type: none"> – 'consider tree planting in areas where it can integrate new development or infrastructure, but take care to avoid mass tree planting in characteristic open landscapes and avoid screening key views' <p>In addition to seeking to reflect guidance, at a detailed level, the Applicants have committed to the use of appropriate native species of local provenance, secured through the oLMP (J2/F04) and the oEMP (J6/F05). This will support the proper delivery ecological and biodiversity enhancements in parallel with visual mitigation, including measures that promote habitat connectivity, support species diversity, and provide a net biodiversity benefit.</p>
1.10	Ref 1.2.6.9 See FBC Landscape Architect comments regarding trenchless techniques under existing trees.	Noted.
	Ref 1.2.6.11 At this stage in the process the exact detailing of species is not of major concern, rather the principles of the development.	The Applicants note LCC's position.
	Ref 1.2.7.1-2 See 2.15-18 below.	Noted.
	Ref 1.2.8.3 With Reference to Table 1: It is not considered that commitments have been sufficiently refined or fixed and are indeed some way from this.	<p>The Applicants note LCC's position at Deadline 4.</p> <p>The Applicants refer to their commitment to submitting updates to the <i>outline Design Principles</i> document at Deadline 5 (J3/F02), with a finalised version to be submitted at Deadline 6. This document has been informed and refined through the SoCG process up to Deadline 5, ensuring that the design framework continues to evolve in response to stakeholder engagement and in accordance with national policy guidance.</p>

Reference	IP submission	Applicants' response
	Ref 1.2.8.6 Reads as an oxymoron. Landscape led but only when Detail and Content is fixed?	<p>The Applicants note LCC's observation.</p> <p>In response, the Applicant refers LCC to the Applicants' consenting strategy, as outlined above at 136.33, and reaffirms that they stand by their approach, which follows the established approach for NSIPs and best practice EIA processes.</p>
1.11	<p>The Applicants state that they want to engage proactively. It is suggested that the conversation should be a two-way process, not simply a presentation of facts of the Applicant viewpoint and an investigation of how to best present their case. The Applicant needs to avoid constantly cross referencing Commitments and other documents (the limits and extents of which are generally already understood) and really aim to think laterally and innovatively with regards to environmental matters and push the boundaries of the Proposed Development for the benefit of the landscape and the people and wildlife that live within it.</p>	<p>The Applicants acknowledge LCC's comments regarding the nature of engagement and the request for discussions to be a two-way process. It is agreed that meaningful dialogue is most effective when both parties are prepared to exchange perspectives and explore options at the organised engagement opportunities, rather than solely repeating their positions, as submitted in written representations.</p> <p>In this regard, the Applicants note that recent meetings between Deadlines 4 and 5 appear, from their perspective, to have facilitated more constructive and substantive engagement between the parties. While it remains necessary for the Applicants to refer to Commitments, secured measures, and other submitted documents to demonstrate compliance with the DCO process and ensure clarity of what is secured, the Applicants will continue to engage with LCC in a collaborative and forward-looking manner for the next 2 deadlines.</p> <p>In doing so, the Applicants seek to ensure that key environmental matters, as LCC see them, are addressed with due regard to innovation and best practice, and in a way that maximises benefits within the scope of the Transmission Assets.</p>
1.12	<p>Layout Examples:</p> <p><u>Hornsea Two Offshore Wond Converter Station:</u></p> <p>On the image as provided it is difficult to assess within the landscape setting and context. With assessment on Google Maps however, it is clear to see that the context is very different from the Greenbelt site of the Proposed Morgan and Morecambe Substations. Firstly the area appears overwhelmingly flat (characteristic of Norfolk), therefore the horizontal view would be limited. Secondly the 'receiving' landscape is much larger scale landscape than the Proposed Morgan and Morecambe Substation sites. This is clearly evident by the field size, likely supporting intensive farming and where the lost smaller scale</p>	<p>The Applicants wish to clarify that the intention of the images presented in the <i>Technical Note: Landscape and Design Matters</i> (REP3-064) was not to provide an assessment of landscape setting or context. Rather, as stated at paragraphs 1.2.9.1 and 1.2.9.3 of the documents [emphasis added by the Applicants]:</p> <p><i>"This section presents a series of precedent images that illustrate some best-practice design approaches for onshore substations associated with electrical infrastructure..."</i></p> <p>and</p> <p><i>"The images provide examples of the application of good design and the opportunity for and benefits of establishing design principles and coding to</i></p>

Reference	IP submission	Applicants' response
	field pattern (visible), has clearly been removed. Thirdly the Hornsea Converter Station is very near existing built infrastructure projects, including an existing Oil Refinery, Killingholme Power Station and an array of urban land uses, therefore effectively forms part of this context. Very different to this Greenbelt setting.	<i>govern good design outcomes set out in National Policy Statements EN-1, EN-3 and EN-5."</i> The Applicants acknowledge that the context of each precedent image differs from the locality of the Transmission Assets. However, as the document makes clear, its purpose was not to share schemes that were like the receiving landscape of the Transmission Assets, but rather to provide illustrative examples of the potential form and appearance of substation development and how design principles might be applied, in support of stakeholders understanding of operational electrical infrastructure.
1.13	<u>Rayleigh main Substation</u> The image indicates a large scale landscape. When assessing on Google Maps, the Substation appears to be set into an area where the landscape has for the main part lost its predominant characteristics and piecemeal development is happening throughout. There will only be a number of years before the whole area is urbanised with pockets of green space within. It might take a couple of decades but it will happen. This understanding originates from studying the historic layering of OS Maps over time when carrying out Landscape Character Assessments. The same impacts would occur adjacent to the Proposed Morgan Substation Site in particular.	
1.14	<u>The Imatra Substation</u> It is difficult to locate exactly on Google Maps, but the landscape type is again different, characterised with a very densely coniferous wooded landscape, affording year round screening and enabling different land uses to be integrated much more easily, than a Greenbelt site, characterised by its openness, long views and agricultural and potentially long standing or ancient land use. It is stated therefore that the Substations indicated as examples relate in terms of being large scale urban entities, however have completely different landscape context and setting to the Greenbelt locations of the Proposed Morgan and Morecambe Substations.	
1.15	Topographic Context:	<i>Topographic Context and Cross-Sections</i>

Reference	IP submission	Applicants' response
	<p>It can be clearly seen that Morecambe Substation is proposed to be located on the top of the higher area of the plateau, thus accentuating its location in the landscape and be clearly and easily visible and dominant feature to the users of the various PRoW south and Bridleway to the north (as has been previously noted in comments on Views).</p> <p>For the Morgan Substation two levels are quoted and it is not feasible to check which is relevant without cross-sections confirming levels. This information is not provided. Again it is clear to see that the Substation is proposed on the higher part of the ridgeline and that abruptly falling levels to the east would significantly limit the ability to screen with vegetation.</p> <p>More contour levels would have been useful, but suffice to note that levels towards Newton-with-Scales and north of the A583 rise to 20m+ AOD.</p> <p>Limiting factors to screening mitigation include cable runs in/ out of Substation areas and it has been queried how deep cables could be (in regards to sinking of built features into the landscape), to enable significant depths of soil medium above cables to allow mitigation planting?</p> <p>Equally Off-site planting creating new hedgerows with trees or reinforcing existing hedgerows and trees, possibly the creation of small woodland blocks, all building in to the landscape pattern would enable better screening and mitigation, than currently proposed.</p> <p>The Contours and topographic pattern clearly illustrate the small-medium scale nature of the landscape, the small scale field pattern, the intricacies of this landscape and therefore the inappropriateness of such large scale impositions and built form within the landscape type.</p>	<p>The Applicants note LCC's comments regarding the topographic context of the substations and the presentation of cross-sections. Its responses are set out below.</p> <p><u>Site Levels and Topography (general)</u></p> <p>The Applicants note LCC's commentary on the "<i>topographic pattern</i>", which for LCC, "...clearly illustrate the small-medium scale nature of the landscape, the small scale field pattern, the intricacies of this landscape and therefore the inappropriateness of such large scale impositions and built form within the landscape type." The siting of both the Morecambe and Morgan substations has been subject to technical, environmental and planning considerations, as set out Volume 1, Chapter 4: Site selection and consideration of alternatives (AS-026) and Annex 4.3: Selection and Refinement of Onshore Infrastructure (AS-026)). The topographic context of the substation has been accounted for within the LVIA (APP-123), as reflected in the supporting visualisations submitted.</p> <p><u>Cross-Section Information</u></p> <p>The Applicants acknowledge LCC's preference for cross-sections with an adjusted vertical exaggeration to aid legibility, which was also noted during ISH3 and documented as <i>Hearing Action Point ISH2.17</i> (S_D5_6/F01).</p> <p>Firstly, the Applicants refute LCC's suggestion that the submitted cross-sections constitute "bad practice". Each figure clearly defines the scale within the document information and the caption beneath the cross-section. The Applicants further confirm that all material has been prepared by a qualified professional, with no intention of misrepresentation.</p> <p>The Applicants also wish to clarify that the cross-sections were specifically prepared in response to comments raised by LCC within its <i>Local Impact Report</i> (REP1-085, paragraphs 7.61 and 7.86), which identified a lack of detail regarding cut and fill operations and requested additional information on changes to the landform. The Applicants therefore provided long cross-sections illustrating indicative platform levels, development height parameters and their relationship to the existing landform and nearest settlements. It was considered that this approach would directly address the concerns raised by LCC regarding the level of detail presented, which has since been clarified at ISH3 and in this LCC's latest written representations.</p>
1.16	<p>Cross-Sections</p> <p>Once again minimal information is presented, providing limited information-this does not demonstrate that the Applicant wants to 'engage proactively'.</p>	

Reference	IP submission	Applicants' response
	<p>There are means of drawing Cross-Sections to aid legibility, unfortunately this isn't demonstrated here. Firstly the Applicants emphasize horizontal scale at the expense of vertical scale. Making the cross-section smaller in extent (the whole valley isn't necessary) would enable a larger vertical scale to aid legibility. Equally no scale is even depicted, which is very poor, as is <u>not illustrating the context of the Substation alongside the cross-section</u> to enable a proper assessment of effects. This is such bad practice and makes the cross-section somewhat purposeless.</p> <p>If it is known that vertical scale will be ridiculously small (as here), the vertical scale can be doubled, for clarity. As long as the scale is annotated adjacent the cross-section (as is good practice) the cross section can be read correctly. Representing in this manner is not proactively engaging.</p>	<p>Further to ISH3, and in order to assist LCC's continued understanding of the proposals, the Applicants have prepared and submitted revised cross-sections for examination, which are append in S_D5_6/F01. These are also incorporated into the interim update of the oDP (J3/F02).</p> <p><u>Mitigation and Planting Strategy (on- and off-site)</u></p> <p>The Applicants refer to their previous response above at 1.8 and 1.9.</p>
1.17	<p>There are other anomalies, such as vegetation as far as the extent of the Dow Brook, I had understood there to be meadow/ grass within the immediate extended area? (even on the cross section indicated). Secondly the hedgerows adjacent the Bridleway appear at least 2m + height, whereas the landscape pattern is 1.5m from September onwards and only at back end summer is a higher height expected. Note also trees cannot be planted in hedgerows where cable runs exist.</p> <p>In terms of detail...no additional fence is desirable for aesthetic purposes directly adjacent to the Dow Brook, rather 'hide' this within planting.</p> <p>The cross sections and the lack of scale information and emphasis on protracted horizontal do not allow assessment, as to whether reduced levels would significantly reduce visual effects (it would of course completely adversely affect landscape character). It would have been expected to propose gentle mounding alongside reduced levels to aid screening, this isn't indicated. Again it is emphasized that insufficient space exists within the site boundary (without off-site planting) to effectively</p>	

Reference	IP submission	Applicants' response
	screen/ mitigate the proposed height and appearance of structures.	
1.18	<p>Indicative Substation Layouts</p> <p>It would be useful to understand which larger of the structures are positioned where (orientation), in relation to the landscape, as without this, the effects cannot be accurately assessed.</p> <p>It is presumed re: Morecambe that reference to 15m height and not 13m is due to the indicative status.</p>	<p>The Applicants note LCC's position and reiterate, as set out in previous responses and SoCG discussions, that it is established practice for NSIPs to submit <i>indicative</i> three-dimensional models illustrating the <i>typical</i> buildings, equipment and infrastructure likely to be required. This approach accords with the adoption of <i>Advice Note Nine: Rochdale Envelope</i>. This approach allows the assessment of a realistic worst-case scenario while retaining flexibility for detailed design to be informed by ongoing consultation and the design governance process secured in the dDCO.</p> <p>The indicative models submitted are consistent with the project description assessed in the EIA and with the authorised development defined within the draft DCO. As repeatedly stated in previous submissions, the final design of each substation will be developed post-consent and will be subject to approval by the relevant planning authority pursuant to Requirement 4 of Schedules 2A and 2B of the dDCO (REP4-007). This represents the established and accepted consenting approach for NSIPs.</p> <p>The Applicants also confirm that the reference to a 15m building height on the indicative substation layout was made in error; the correct maximum building height is 13m, as set out in the Project Description.</p>
1.19	<p>Meetings</p> <p>It is considered that face to face meetings, as opposed to Teams Meetings would be more constructive. The latter are too formal, with too many people involved, which do not allow discussions in an open context over a plan by the specific landscape architects.</p>	<p>As stated above at 1.11, the Applicants acknowledge LCC's comments regarding the nature of engagement and the request for discussions to be a two-way process. It is agreed that meaningful dialogue is most effective when both parties are prepared to exchange perspectives and explore of options at the organised engagement opportunities, rather than solely the repeat their positions as submitted in written representations.</p> <p>In this context, the Applicants note that recent meetings held between Deadlines 4 and 5, including a face-to-face meeting between the Applicants' Landscape Expert Witness and LCC's Principal Landscape Officer, have facilitated more constructive and substantive engagement. These meetings have enabled the parties to explore matters of detail. collaboratively and directly.</p>
	<p>Proactive Engagement</p> <p>There needs to be a greater extent of lateral and innovative consideration, incorporation and detail of the issues noted throughout what appears the constant repetition of comments.</p>	

Appendix A: Response to LCC Access submissions

Access	LCC submission	Applicants' response
A9 & A9b	<p>There is a safety issue (conflicting with sustainable users). If a cyclist is using the sustainable link, and a HGV is waiting to turn in to the site, the trailer will be overhanging on the M55 to Heyhouses Link Rd. Solution needs to be highlighted in the CTMP and to be permanently managed.</p> <p>In addition, the applicant needs to ensure swept paths are not crossing the centre line of the M55 to Heyhouse Link Rd.</p>	<p>The Applicants would initially note that throughout the UK and Lancashire, non-motorised users (NMU) routes cross junctions and drivers are required by the Highway Code to give way to NMUs wishing to cross. In these instances, drivers need to check that there are no NMUs before making the turn so as to avoid conflict. In the vicinity of access A9 it is noteworthy that drivers would have good forward visibility of any approaching NMUs and can make a judgement as to whether it is safe to proceed to cross the NMU route or if not to wait on the highway for the users to pass. The Applicants therefore consider that the risk of a driver starting the manoeuvre and then needing to stop for a NMU (leading to a protruding trailer) is limited and no different to other locations in the UK or Lancashire, or the existing situation at this access for farm traffic. Notwithstanding, the Applicants are willing to discuss options to assist in further highlighting the presence of the NMU crossing to drivers through the development of the detail Construction Traffic Management Plan (CTMP). Options could include highlighting this location as part of the Driver Induction process secured within Section 1.4.5 of the outline Construction Traffic Management Plan (oCTMP) (REP4-056), or through the provision of additional signage or road markings, secured through the outline Highway Access Management Plan (oHAMP) (REP4-060).</p> <p>The Applicants have committed to an independent road safety review of the detailed designs via the road safety audit process outlined in the oHAMP, Section 1.4.4. (REP4-060). This is the mechanism for determining if the access proposal introduces bespoke risks that would not be typical of a functioning UK junction.</p> <p>With regards to comments on the swept path analysis (SPAs), the Applicants note that the SPA drawings for accesses A9 and A9b presented within the oHAMP (CR1-022) do not oversail the centre line and consider this comment relates to an old version of the drawings.</p>
A33	<p>Hedgerow to be removed is not shown on this drawing.</p> <p>Very theoretical swept paths are provided. There is no factor of safety between the swept paths, and they are unlikely to be followed in reality. The manoeuvring of HGVs will be at very slow speeds with scrubbing (of carriageway) at the junction.</p> <p>Note: Supporting link (Link 33b) is not wide enough for two-way movements. The applicant acknowledges the link is not</p>	<p>The Applicants have previously discussed this access with LCC and understood that all matters had been agreed.</p> <p>The hedgerow in the vicinity of access A33 (notated MGMC_35) is shown on Sheet 9 of the B18 Tree Preservation Order and Hedgerow Plan - Part 1 of 3 (APP-165) providing the powers for its removal (if required). For completeness the Applicants propose to include this detail as part of a consolidated revision to the outline Highway Access Management Plan (oHAMP) at Deadline 6.</p> <p>In response to earlier comments within LCCs Relevant Representation (RR-1262) on the matters of vehicle separation at this access the Applicants increased the separation between inbound and outbound vehicles (plans were submitted to LCC prior to Deadline 3 and an updated oHAMP was subsequently submitted at Deadline 3 (REP3-024)) and as such</p>

Access	LCC submission	Applicants' response
	<p>suitable for 2-way HGV movements and suggest mitigation in the CTMP. The LHA consider the mitigation to be too generic and further comment on this is provided in the oCTMP section below.</p>	<p>consider that this comment has previously been addressed. The Applicants would however note that there is space within the Order Limits for further design revisions to increase the size of the junction in the future should LCC consider the separation is still insufficient and if required, additional widening should be addressed at the detailed design stage.</p> <p>With regard to comments on link width, these do not relate to access designs and the Applicants refer LCC to the response to REP4-136 136.55 on link specific mitigation.</p>
A38 – A41	<p>Proposed Signals at crossing points. Need further details on the signal's operation, i.e., at all times of the (day / night) or for particular hours in the day.</p> <p>Need to ensure the signals and supporting signs are temporary (this infrastructure will not form part of the LHA's maintainable infrastructure and will need its own power source).</p> <p>Need to know expected HGVs at crossing points to identify impacts. Note: may need to consider the road surface, and requirement for resurfacing)</p>	<p>With regard to comments traffic signal timing the Applicants would propose that for the duration of construction, traffic signals would operate during the permitted working hours and be switched off/covered when not in use. Any revisions to this basis can be agreed as part of the detailed HAMP.</p> <p>The Applicants would note that in relation to comments on ensuring signals and signs are temporary, these crossings are temporary. Section 1.4.3 of the oHAMP (REP4-060) includes commitments to the removal of accesses and crossings once works are complete.</p> <p>The Applicants note that LCC have committed to entering into a Section 278 (Highways Act) agreement (Post hearing submissions including written submissions of oral cases, REP4-136, Appendix C). This or equivalent DCO provisions are the appropriate mechanism for finalising details of street furniture, power supply and obligations for maintenance of highway infrastructure.</p> <p>The Applicants have shared details of the level of use of all crossings (REP4-113) following LCCs request at ISH2 and consider that this comment has been addressed.</p> <p>The highway surface in the vicinity of accesses and crossings is a matter that would be reviewed as part of the detailed design of access as part of the final detailed HAMP. The Applicants would also note that section 1.13.3 of the oCTMP (REP4-056) includes commitments to preventive and ongoing maintenance in relation to the potential for damage to the highway that could be attributable to the Transmission Assets.</p>
A44 - A47	<p>Proposes 30mph speed limit, however, no detail on enforcement. The reasoning provided for this is as the observed average speed recorded was at 33mph.</p> <p>This recording may not have been on straight section, and therefore speeds at the access may be greater. DMRB requires splay to be 120m. Visibility Splay</p>	<p>The Applicants have previously discussed this access with LCC and understood that all matters had been agreed.</p> <p>The Applicants would note that crossings A44 – A47 are located on a section of Lower Lane between two sharp bends which act to reduce vehicle speeds. The speed survey was located between the two bends on the straight section of Lower Lane in the vicinity of crossing A44 & A45 (Lat: 53.765858, Long: -2.864417).</p> <p>The Applicants would note that a 120m visibility splay in the Design Manual for Roads and Bridges (DMRB) equates to a speed of 44mph, which is in excess of the recorded average</p>

Access	LCC submission	Applicants' response
	needs to be increased. If speed limit reduction is proposed, further measures for self-enforcement are required. Police will not enforce speed limit at this location.	<p>speeds of 33mph and 85th percentile speed of 40mph. Notably, the salient guidance for the provision of visibility splays on low speed rural roads is Manual for Streets 2 (MfS), the Applicants refer to paragraph 1.3.7 of MfS 2 which notes that:</p> <p><i>"...in rural areas many parts of the highway network are subject to the national speed limit but have traffic speeds significantly below 60mph. (See Figure 1.2) Again in these situations where speeds are lower than 40mph, MfS SSD parameters are recommended."</i></p> <p>Noting that average speeds are 33mph (well below 40mph), 85th percentiles speeds are 40mph, the Applicants would assert that the principles of MfS should apply. When applying MfS the appropriate visibility splay for a measured speed of 33m is approximately 50m. It is noteworthy that a visibility splay of 70m has been provided and therefore the splay is in excess of the requirements of MfS and aligns with the proposed 30mph speed limit in the DMRB standards.</p> <p>The Applicants have included plans of proposed speed limit signage (at the request of LCC) within the updated oHAMP (REP4-060) to highlight the proposed speed limit and note that as average speeds are in line with this there is likely to be good compliance.</p> <p>The Applicants disagree with the inference that the proposal requires police enforcement to be safe. Police forces can typically object to changes in the speed limit that are not 'self-enforcing'. In this location, noting that average speeds are already in line with the proposed speed limit (and likely lower through the bends) the limit should be considered to be self-enforcing.</p>
A53	Visibility splay for 4.5m (120m) needs to be increased, in line with the 2.4m splay (160m)	<p>The Applicants have previously discussed this access with LCC and understood that all matters had been agreed. The Applicants note that a 2.4m x distance is considered to be sufficient to ensure that vehicles approaching the junction have adequate space to safely stop, observe the road occupancy and make a decision on entering the carriageway and aligns with the advice in the Design Manual for Roads and Bridges (DMRB). 4.5m x is promoted for capacity reasons in the DMRB to allow vehicles to roll up to a junction and is not proportional for a temporary situation with low 'side road' flows. However, as agreed with LCC 4.5m x distance has been shown on the updated plans where this can be provided within the Order Limits and detailed as a 'step below' standards where necessary to contain the splay within the Order Limits. The Applicants are unclear as to why LCC now disagree with this position.</p> <p>Notwithstanding, in the interests of moving matters forward, the Applicants propose to increase the length of the splay from 120m to 150m. A splay of 150m can be provided within the extents of the Order Limits and corresponds with the measured 85th percentile speed of</p>

Access	LCC submission	Applicants' response
		50mph (a splay of 160m equates to 53mph). These updated plans will be provided within a consolidated update to the oHAMP at Deadline 6.
A57	<p>This route forms part of the well-used defined cycleway (Guild Wheel).</p> <p>The CTMP suggests the holding of cyclists while the bridge is being used by construction traffic. There is no detail of where cyclists will be held. The LHA are awaiting further information on non-motorised use. Bridge width is 4.0m. On the access to works plan, access is sought also to the south, this would avoid use of the bridge. This would be preferable (negating the use of the bridge), and vehicles could U-turn at the signals (circa. 330m to the east).</p>	Applicants refer LCC to the response to REP4-136 136.54.
A58	<p>Not adopted highway (private cycleway). Awaiting further info on non-motorised use. It is unclear how cyclists will be managed</p>	<p>The Applicants have previously discussed this access with LCC and understood that all matters had been agreed.</p> <p>The Applicants note that the access is located on an unadopted highway, however, the access and access road are included in the order limits and connect to Wallend Road (a public highway). The DCO would therefore afford the Applicants the rights to utilise this route for access.</p> <p>With regard to how cyclists will be managed, the Applicants would note that the existing access road is provided with a cycleway marked along the road by a white line in which cyclists can travel at grade with traffic.</p> <p>The width of the existing road not marked for cycles does not allow two vehicles to pass without crossing the white line into the area marked for cycles. This current arrangement therefore requires traffic wishing to pass to traverse into the area demarcated for cycles. In these instances, drivers would need to give-way to any oncoming cycles. This existing arrangement would also apply to the Transmission Assets traffic.</p> <p>The Applicants would note that details of the level of use of the cycle route have been captured and shared with LCC. These surveys confirm there is very limited use of the route</p>

Access	LCC submission	Applicants' response
		<p>by cycles (approximately one every two hours) and as such the existing and forecast levels of interaction between vehicles and cycles is limited.</p> <p>Notwithstanding, the Applicants have discussed and agreed options with LCC at a meeting on the 18 September 2025 to manage this interaction through the provision of an additional passing place. The agreed measures will be included within an update the outline Construction Traffic Management Plan at Deadline 6.</p>
A59	<p>Note: Supporting link (Link 101) is constrained.</p> <p>The applicant acknowledges the link is not suitable for 2-way HGV movements and suggest mitigation in the CTMP. The LHA consider the mitigation to be too generic and further comment on this is provided in the oCTMP section below.</p> <p>The vehicles expected HGV numbers provided give a total number for the 3 accesses off Howick Cross Ln. Each junction needs to be considered in isolation.</p> <p>Visibility to the west not provided for this access. The LHA do not foresee an issue here with mitigation but have not yet seen the principles to support.</p>	<p>With regard to comments on link width, these do not relate to access designs and the Applicants refer LCC to the response to REP4-136 136.55.</p> <p>The Applicants have shared details of the level of use of all accesses previously with LCC and again in response to requests for crossing numbers following LCCs request at ISH2 (REP4-113). The Applicants therefore consider that this comment is out of date but for clarity repeat that there would be approximately 27 Heavy Vehicle (HV) daily movements to access A59 at peak.</p> <p>The Applicants have previously discussed this access with LCC and understood that all matters had been agreed. Notably, it was discussed that visibility to the west is compromised and as such Table 1.1 of oHAMP and the notes in the drawing for A59 in the oHAMP (REP4-060) outline that a banksperson will be utilised at this location to control egress and as such consider that this comment is out of date.</p>
A63	<p>Length for pedestrians to cross is significant (circa 25m). Further changes required to allow provision of an island.</p>	<p>The Applicants refer LCC to the oHAMP (REP4-060) that was submitted at Deadline 4. It can be noted that access A63 was amended in response to feedback from LCC noting that the crossing distance was excessive. These amendments include for the provision of a central island to reduce the distance pedestrians are required to cross. It is considered therefore that this access can be agreed.</p>