

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

**Fylde Borough Council SoCG F04**



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## Glossary

Term	Meaning
400 kV grid connection cables	Cables that will connect the proposed onshore substations to the existing National Grid Penwortham substation.
400 kV grid connection cable corridor	The corridor within which the 400 kV grid connection cables will be located.
Applicants	Morgan Offshore Wind Limited (Morgan OWL) and Morecambe Offshore Windfarm Ltd (Morecambe OWL).
Development Consent Order	An order made under the Planning Act 2008, as amended, granting development consent.
Environmental Statement	The document presenting the results of the Environmental Impact Assessment process.
Generation Assets	The generation assets associated with the Morgan Offshore Wind Project and the Morecambe Offshore Windfarm include the offshore wind turbines, inter-array cables, offshore substation platforms and platform link (interconnector) cables to connect offshore substations.
Intertidal area	The area between Mean High Water Springs and Mean Low Water Springs
Landfall	The area in which the offshore export cables make landfall (come on shore) and the transitional area between the offshore cabling and the onshore cabling. This term applies to the entire landfall area at Lytham St. Annes between Mean Low Water Springs and the transition joint bays inclusive of all construction works, including the offshore and onshore cable routes, intertidal working area and landfall compound(s)
Mean High Water Springs	The height of mean high water during spring tides in a year.
Mean Low Water Springs	The height of mean low water during spring tides in a year.
Morecambe OWL	Morecambe Offshore Windfarm Limited is owned by Copenhagen Infrastructure Partners' (CIP) fifth flagship fund, Copenhagen Infrastructure V (CI V).
Morgan and Morecambe Offshore Wind Farms: Transmission Assets	The offshore and onshore infrastructure connecting the Morgan Offshore Wind Project and the Morecambe Offshore Windfarm to the national grid. This includes the offshore export cables, landfall site, onshore export cables, onshore substations, 400 kV grid connection cables and associated grid connection infrastructure such as circuit breaker compounds.  Also referred to in this report as the Transmission Assets, for ease of reading.
Morgan OWL	Morgan Offshore Wind Limited is a joint venture between JERA Nex bp (JNbp) and Energie Baden-Württemberg AG (EnBW).
Onshore export cables	The cables which would bring electricity from landfall to the onshore substations.
Onshore export cable corridor	The corridor within which the onshore export cables will be located.

Term	Meaning
Planning Inspectorate	The agency responsible for operating the planning process for applications for development consent under the Planning Act 2008.
Substation	Part of an electrical transmission and distribution system. Substations transform voltage from high to low, or the reverse by means of electrical transformers.
Transmission Assets	See Morgan and Morecambe Offshore Wind Farms: Transmission Assets (above).
Transmission Assets Order Limits	The area within which all components of the Transmission Assets will be located, including areas required on a temporary basis during construction and/or decommissioning.

## Acronyms

Acronym	Meaning
CoCP	Code of Construction Practice
DCO	Development Consent Order
EnBW	Energie Baden-Württemberg AG
FC	Fylde Borough Council
FRA	Flood Risk Assessment
MLWS	Mean Low Water Springs
SoCG	Statement of Common Ground
WSI	Written Scheme of Investigation

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# **1 Initial Statement of Common Ground between Morgan and Morecambe Offshore Wind Farms: Transmission Assets and Fylde Borough Council**

## **1.1 Introduction**

### **1.1.1 Overview**

1.1.1.1 This Statement of Common Ground (SoCG) has been prepared between Morgan Offshore Wind Limited and Morecambe Offshore Windfarm Ltd (hereafter referred to as ‘the Applicants’) and Fylde Borough Council (FBC), together the parties. The SoCG sets out the areas of agreement and disagreement between the parties in relation to the proposed Development Consent Order (DCO) application for the Morgan and Morecambe Offshore Wind Farms: Transmission Assets (hereafter referred to as ‘the Transmission Assets’).

1.1.1.2 The need for a SoCG between the Applicants and FBC is set out in Section 1 of Appendix F of the Rule 6 letter issued by the Planning Inspectorate on 28 March 2025.

1.1.1.3 This document is intended to provide the Examining Authority (ExA) with an overview of the level of common ground between the parties. The SoCG will identify where agreement has been reached, where differences lie and the reasons for disagreement or outstanding matters. The SoCG will also specify the actions needed to address the issues and will facilitate further discussion between the parties. The SoCG will be updated during the Transmission Assets Examination and submitted at the Deadlines indicated in the Rule 6 letter.

### **1.1.2 Transmission Assets elements under FBC’s remit**

1.1.2.1 The elements of the Transmission Assets which may affect the interests of FBC include the area of the Transmission Assets Order Limits landward of Mean Low Water Springs (MLWS), covering the intertidal works, onshore export cable corridor and onshore substations. These are detailed in Schedule 1 (Authorised Project), Part 1 (Authorised Development) of the Draft DCO (AS-004).

1.1.2.2 This SoCG covers the following topics of relevance to FBC:

- Historic Environment (heritage assets);
- Onshore Ecology and Nature Conservation;
- Landscape and Visual Resources;
- Land Use and Recreation;
- Noise and Vibration;
- Air Quality;

- 
- Climate Change;
  - Socio-economics; and
  - DCO.

### 1.1.3 Overview of Transmission Assets

- 1.1.3.1 The design philosophy for the Transmission Assets is for the Morgan Offshore Wind Project: Generation Assets and the Morecambe Offshore Windfarm: Generation Assets (referred to as ‘the Generation Assets’) to be electrically independent. Therefore, each offshore wind farm will have its own separate set of transmission assets (e.g., cable and substation infrastructure). However, the location of the infrastructure will be aligned (where practicable), for example within aligned offshore and onshore cable corridors to minimise impacts to environment and the community.
- 1.1.3.2 Morgan OWL and Morecambe OWL (the Applicants), are jointly seeking a single consent for their electrically separate transmission assets comprising aligned offshore export cable corridors to landfall and aligned onshore export cable corridors to separate onshore substations (and associated infrastructure), and onward connection to the National Grid at Penwortham, Lancashire.
- 1.1.3.3 The key components of the Transmission Assets include the following.
- Offshore elements:
    - offshore export cables: these export cables will bring the electricity generated by the Generation Assets to the landfall for onward transmission.
  - Landfall:
    - landfall site: this is where the offshore export cables are jointed to the onshore export cables via the transition joint bays. This term applies to the entire area between Mean Low Water Springs and the transition joint bays.
  - Onshore elements:
    - onshore export cables: these export cables will be jointed to the offshore export cables via the transition joint bays at the landfall site, and will bring the electricity generated by the Generation Assets to the onshore substations;
    - onshore substations: the two electrically separate onshore substations will contain the components for transforming the power supplied via the onshore export cables up to 400 kV;
    - 400 kV grid connection cables: these export cables will bring the electricity generated by the Generation Assets from the two electrically separate onshore substations to the existing National Grid substation at Penwortham;



- environmental mitigation areas: temporary and/or permanent areas, including accesses identified to provide environmental mitigation only; and
- biodiversity benefit areas: temporary and/or permanent areas, including accesses identified to provide biodiversity benefit only.

## 1.1.4 Approach to SoCG

1.1.4.1 This initial SoCG has been developed during the pre-examination phase and will be progressed during the examination phases of the Transmission Assets. In accordance with discussions between the parties, the SoCG is focused on those issues raised by FBC within its response to Scoping, Section 42 consultation and as raised through the Evidence Plan process that has underpinned the pre-application consultation between the parties. This SoCG also includes those issues raised by FBC during the post-application phase (i.e. relevant representations and pre-examination meetings).

1.1.4.2 The structure of this SoCG is as follows:

- Section 1.1: Introduction
- Section 1.2: Summary of SoCG
- Section 1.3: Summary of consultation
- Section 1.4: Agreement logs.

## 1.2 Summary of SoCG

### 1.2.1 Overview

1.2.1.1 This SoCG outlines the consultation that has taken place between the parties during the pre-application and post-application phase of the Transmission Assets. The agreement logs present the position reached on 20 May 2025 (Deadline 1).

### 1.2.2 Summary of those matters agreed, ongoing points of discussion and not agreed

1.2.2.1 Table 1.1 provides a summary of those matters agreed, an ongoing point of discussion or not agreed between the parties.

**Table 1.1: Summary of those matters agreed, ongoing points of discussion and not agreed**

Topic	Agreement status
Historic Environment (heritage assets)	Ongoing point of discussion
Onshore Ecology and Nature Conservation	Ongoing point of discussion
Landscape and Visual Resources	Ongoing point of discussion
Land Use and Recreation	Ongoing point of discussion

Topic	Agreement status
Noise and Vibration	Ongoing point of discussion
Air Quality	Ongoing point of discussion
Climate Change	Ongoing point of discussion
Socio-economics	Ongoing point of discussion
DCO	Ongoing point of discussion

## 1.3 Summary of Consultation

- 1.3.1.1 Table 1.2 below provides an overview of the consultation undertaken by the Applicants with Fylde Council during the pre-application phases of the Transmission Assets. Table 1.3 below provides a summary of the consultation undertaken by the Applicants with FBC during the post-application phases of the Transmission Assets.
- 1.3.1.2 The consultation presented is not exhaustive but provides an indication of aspects of key discussions undertaken. All attendees at the meetings listed in Table 1.2 are provided in the Technical Engagement Plan (APP-189) and Consultation Report (APP-170), however for the avoidance of doubt, this SoCG is limited to matters between FBC and the Applicants.
- 1.3.1.3 This initial SoCG makes reference to other documents submitted with the Transmission Assets applications that set out, in greater detail, the discussions that have taken place between FBC and the Applicants. These documents are:
- The Technical Engagement Plan (APP-041) and appendices (APP-190, APP-191 and APP-192)
  - The Consultation Report (APP-170) and annexes (APP-187 and APP-188)
  - FBC Relevant Representation (RR-705)
  - The Applicants' response to SRBC Relevant Representation at the Procedural Deadline.

**Table 1.2: Summary of pre-application consultation with FBC**

Date	Form of consultation	Statutory or non-statutory engagement	Summary of consultation
<b>Scoping Opinion</b>			
8 December 2022	Scoping Opinion	Statutory engagement	<p>Specific comments raised by FBC in its scoping opinion related to:</p> <ul style="list-style-type: none"> <li>• Cable routing environmental impact needs to be properly outlined</li> </ul> <p>Scope of EIA needs to be sufficient to ensure all aspects are considered.</p>

Date	Form of consultation	Statutory or non-statutory engagement	Summary of consultation
<b>Steering Group</b>			
11 May 2023	Meeting 1	Non-statutory engagement	Matters discussed included timeline of activities, site selection process, cable corridor selection process and designated site interactions.
16 July 2024	Meeting 2	Non-Statutory engagement	Matters discussed included project and survey updates, route planning refinement post-PEIR, evidence plan process update and next steps.
<b>Section 42 Consultation</b>			
22 November 2023	Section 42 Statutory Consultation Response	Statutory engagement	<p>FBC identified the need for the following information:</p> <ul style="list-style-type: none"> <li>• More certainty regarding the scheme</li> <li>• Impacts of substation being near residential settlements</li> <li>• Justification for substation sites in the greenbelt and mitigations to its impact</li> <li>• Ruling out impact to aviation industry</li> <li>• Further consideration of visual impact mitigation</li> <li>• Further discussions on noise mitigation</li> </ul> <p>Other points of debate include local impacts and local benefits of energy (compensation) coming to fruition, lack of acknowledgement of the human impacts, alternative routes, farmer consultation, and general lack of transparency in decision making.</p>
<b>Evidence Plan Process, Historic Environment EWG</b>			
18 January 2023	EWG01	Non-statutory engagement	Matters discussed included an agreement of the study area buffer being 500m, geoarchaeological deposit modelling with topographical surveys.
09 August 2023	EWG02	Non-statutory engagement	Matters discussed included site selection, non-statutory consultation, project programme update and assessment update.
08 February 2024	EWG03	Non-statutory engagement	Matters discussed included site selection update, agreement log review, Section 42 responses, survey update and commitments.
<b>Evidence Plan Process, Onshore Ecology and Nature Conservation EWG</b>			
23 March 2023	EWG01	Non-statutory engagement	Matters discussed included an overview of the Transmission Assets, Project programme, overview of the Expert Working Groups and Evidence Plan Process, Onshore Route

Date	Form of consultation	Statutory or non-statutory engagement	Summary of consultation
			Planning and Site Selection, the scoping opinion and summary of impact in relation to onshore ecology and onshore and intertidal ornithology.
13 September 2023	EWG02	Non-statutory engagement	Matters discussed included updates on the onshore ecology assessment and the onshore and intertidal ornithology assessment including: <ul style="list-style-type: none"> <li>• Methodology for construction scenarios;</li> <li>• Assessment update;</li> <li>• Approach to cumulative assessment</li> <li>• Initial identification of mitigation</li> </ul>
18 December 2023	EWG03	Non-statutory engagement	Matters discussed included an update on the Projects Programme, Onshore Route Planning and Site Selection and the Projects approach to Biodiversity Net Gain (including an agreement on the methodology and existing schemes and projects for collaboration).
26 January 2024	EWG04	Non-statutory engagement	Matters discussed included site selection update, survey coverage for the application update and strategy, Section 42 responses, use of trenchless techniques, scope of wintering bird data, commitments and mitigation and wider application documents .
31 May 2024	EWG05	Non-statutory engagement	Matters discussed included an update site selection and on surveys coverage and the proposed strategy in regard to surveys.
19 June 2024	EWG06A	Non-statutory engagement	Matters discussed focussed on onshore ecology and included an update relating to the proposed works at landfall, survey update, summary of mitigation strategy, approach on reducing adverse effects, pre-construction surveys and monitoring of proposed mitigation areas.
27 June 2024	EWG06B	Non-statutory engagement	Matters discussed focussed on onshore and intertidal ornithology and included a site selection update, proposed works in the intertidal area, survey update, summary of mitigation strategy, approach on reducing adverse effects, pre-construction surveys and monitoring of proposed mitigation areas.
<b>Evidence Plan Process, Landscape and Visual Impacts EWG</b>			
22 February 2024	EWG01	Non-statutory engagement	Matters discussed included reducing the scope of the assessment (from seascape and Landscape and Visual Impact Assessment

Date	Form of consultation	Statutory or non-statutory engagement	Summary of consultation
			(LVIA) to just LVIA), agreement of representative viewpoints, and grey photomontage presentation of main infrastructure. FBC approves of ZTV viewpoints after meeting, suggests substation building and infrastructure are disguised.
24 September 2024	Design Principles and Landscape management meeting	Non-statutory engagement	Matters discussed included the Outline Landscape Management Plan and Outline Design Principles document.
<b>Evidence Plan Process, Noise and Vibration EWG</b>			
21 April 2023	EWG01	Non-statutory engagement	Matters discussed included an overview of the project and process, defining area of interest for noise surveys, study area, and general methodology.
25 January 2024	EWG02	Non-statutory engagement	Matters discussed included programme, update, site selection update, statutory consultation, Section 42 responses, assessment update and commitments/mitigation.
09 February 2024	Noise general discussions with Fylde Borough Council	Non-statutory engagement	Noise and vibration was added to the general update to Fylde Borough Council due to IT issues preventing attendance at EWG02. Matters discussed include Section 42 responses and presenting the proposed approach to the assessment of operational and construction noise for the substation sites
18 July 2024	EWG03	Non-statutory engagement	Matters discussed include the noise assessment updates for the baseline, natural tranquillity and operational noise, and the assessment approaches for these.

**Table 1.3: Summary of post-application consultation with Fylde Council**

Date	Form of consultation	Statutory or non-statutory engagement	Summary of consultation
27 January 2025	Relevant Representation	Statutory Consultation	Provision of FBC's Relevant Representation (RR-705)

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## 1.4 Agreement log

- 1.4.1.1 This section of the SoCG sets out the level of agreement between the parties. For each matter the status is identified as being either agreed, not agreed or an ongoing point of discussion, according to the criteria set out in Table 1.4 below

**Table 1.4: Position definitions and colour coding**

Position and colour coding	Definition of position
Agreed	The matter is considered to be agreed between the parties.
Ongoing point of discussion	The matter is neither agreed or not agreed, and is a matter where further discussion is required between the parties.
Not agreed, but not material	The matter is not considered to be agreed between the parties, but is not deemed material
Not agreed	The matter is not considered to be agreed between the parties.

- 1.4.1.2 Table 1.5 to Table 1.12 set out the level of agreement between the parties for each relevant component of the application (as identified in section 1.1.2).
- 1.4.1.3 Officers at FBC have reviewed this updated raft of the SoCG and are comfortable that it closely reflects the Council's most up-to-date position. However, given the very short timescales between DL5 and the hearings, as well as the amount of new information to be reviewed, some consultation responses are still pending and it is possible that new issues or alternative interpretations will be provided for consideration. For this reason, FBC reserves the right to amend commitments in this SoCG as appropriate. FBC understands that this may not be typical practice but considers that this approach is most useful and appropriate given the circumstances. FBC expects to submit a further SoCG at DL6 which will reflect a committed position.

## 1.4.2 Historic Environment

**Table 1.5: Agreement Log between the parties on Historic Environment**

Reference Number	Discussion point	Applicants' position	Fylde Borough Council position	Status
FBC.HE1	Consultation	The Application documents have had regard to matters raised by FBC via statutory and non-statutory consultation activities in relation to historic environment	FBC's general position is that inadequate consultation has been undertaken – reference to Examination library objection to acceptance (AoC-008). It is acknowledged that FBC were consulted at the EIA scoping and PEIR stages on the content of the historic environment assessment.  However, specifically with respect to Historic environment, FBC acknowledges a satisfactory level of consultation.	Agreed
FBC.HE.2	Study Area	The EIA study area is appropriate for the impacts and receptors assessed.	No objections	Agreed
FBC.HE.3	Surveys	The survey approach is appropriate for the site, impacts and receptors assessed. The site-specific surveys have been undertaken in accordance with agreed methodologies.	FBC considers that the Applicants' assessment of non-designated heritage, most recently summarised in response to Q11.1.4 in REP3-056, does not properly identify, describe and assess impacts upon significance. However, FBC expects that the outcome of any such proper assessment will have minor impacts on the proposals at most and could most likely be appropriately handled within the scope of the relevant commitments and management plans (subject to any other submission on those other documents). FBC requests that this assessment is	Ongoing point of discussion

Reference Number	Discussion point	Applicants' position	Fylde Borough Council position	Status
			updated to enable an informed position to be reached.	
FBC. HE.4	Surveys	<p>The approach and contents of the Desk Based Assessment is appropriate for the wider assessment.</p> <p>This also includes the assessment of non-designated assets.</p>	<p>FBC considers that the Applicants' assessment of non-designated heritage, most recently summarised in response to Q11.1.4 in REP3-056, does not properly identify, describe and assess impacts upon significance. However, FBC expects that the outcome of any such proper assessment will have minor impacts on the proposals at most and could most likely be appropriately handled within the scope of the relevant commitments and management plans (subject to any other submission on those other documents). FBC requests that this assessment is updated to enable an informed position to be reached.</p>	Ongoing point of discussion
FBC.HE.5	Baseline environment	<p>Sufficient primary and secondary data (including site-specific surveys) have been collated to appropriately characterise the onshore archaeology and heritage baseline environment for the purposes of EIA within Volume 3, Chapter 5: Historic environment (APP-096).</p> <p>This also includes the assessment of non-designated assets.</p>	<p>FBC considers that the Applicants' assessment of non-designated heritage, most recently summarised in response to Q11.1.4 in REP3-056, does not properly identify, describe and assess impacts upon significance. However, FBC expects that the outcome of any such proper assessment will have minor impacts on the proposals at most and could most likely be appropriately handled within the scope of the relevant commitments and management plans (subject to any other submission on those other documents). FBC requests that this assessment is updated to enable an informed position to be reached.</p>	Ongoing point of discussion



Reference Number	Discussion point	Applicants' position	Fylde Borough Council position	Status
			FBC notes that a significance proportion of trial-trenching is still to be carried out but defers their position on this to LCC as the relevant consultee for archaeology.	
FBC.HE.6	Assessment Methodology	The sensitivity and significance of the onshore archaeology receptors has been appropriately and adequately described within Volume 3, Chapter 5: Historic environment (APP-096).	FBC aligns with LCC agreement on the assessment methodology adopted.	Agreed
FBC.HE.7	Assessment Methodology	The methodologies used in within Volume 3, Chapter 5: Historic environment (APP-096) are appropriate for assessing the potential impacts the Transmission Assets on onshore archaeology and heritage assets.	Agreed, with the caveat outlined in FBC.HE.5.	Agreed
FBC.HE.8	Project design envelope	The assessment has appropriately defined the Maximum Design Scenario (MDS) for the purposes of EIA.	FBC has made comments on maximum design more generally in its Deadline 5 Answers to Questions, and therefore reserves its position whilst that more general debate is ongoing.	Ongoing point of discussion
FBC.HE.9	Assessment of the effects from the project alone	The potential impacts identified within Volume 3, Chapter 5: Historic environment (APP-096) represent a comprehensive list of the potential impacts in relation to onshore archaeology and heritage assets.  This also includes the assessment of non-designated assets.	Agreed with the exception of non-designated heritage assets.	Ongoing point of discussion
FBC.HE.10	Assessment of the effects from the project alone	The likely significant adverse residual effects (in EIA terms) identified within Volume 3, Chapter 5: Historic environment (APP-096) represent a comprehensive list of	Agreed with the exception of non-designated heritage assets.	Ongoing point of discussion

Reference Number	Discussion point	Applicants' position	Fylde Borough Council position	Status
		the likely significant adverse residual effects on onshore archaeology. This also includes the assessment of non-designated assets.		
FBC.HE.11	Assessment of the effects from the project cumulatively with other projects	The likely significant adverse residual effects (in EIA terms) which are predicted to arise from the development of the Transmission Assets cumulatively with other project and plans identified within Volume 3, Chapter 5: Historic environment (APP-096) represent a comprehensive list of the likely significant adverse residual effects on the historic environment.	Agreed with the exception of non-designated heritage assets.	Ongoing point of discussion
FBC.HE.12	Mitigation	The mitigation measures identified in Volume 3, Chapter 5: Historic environment (APP-096) are considered appropriate and adequate for the Transmission Assets.	FBC are still reviewing. Potentially an area of agreement.	Ongoing point of discussion
<b>Other Documents and Plans</b>				
FBC.HE.13	Outline Onshore Written Scheme of Investigation (WSI)	The Outline Onshore and Intertidal WSI (APP-214) is secured under Requirement 11 of the draft DCO (AS-004) and is considered appropriate with regard to proposed monitoring and management principles	FBC defer to LCC in regards to the WSI.	Agreed

### 1.4.3 Onshore Ecology and Nature Conservation

**Table 1.6: Agreement Log between the parties on Onshore Ecology and Nature Conservation**

Reference Number	Discussion point	Applicants' position	Fylde Borough Council position	Status
<b>EIA</b>				
FBC.OE.1	Consultation	The Applicants have undertaken adequate consultation with FBC on potential impacts on onshore ecology and nature conservation.	Whilst FBC have raised concerns regarding the overall adequacy of consultation undertaken by the Transmission Assets project (AoC-008) FBC agree confirm that the consultation for onshore ecology and nature conservation has been adequate. Source: SoCG meeting 05/09/2025	Agreed
FBC.OE.2	Consultation	The EIA has had consideration to matters raised by FBC through statutory and non-statutory consultation on potential impacts on onshore ecology and nature conservation.	FBC has raised a number of concerns in its submissions, relating to onshore ecology and nature conservation. Some of these concerns remain under discussion.	Ongoing point of discussion
FBC.OE.3	Policy and planning	The Application has identified and considered the plans and policies relevant to onshore ecology and nature conservation, within FBC's remit.	Notwithstanding that it has made some comments regarding guidance and data, FBC confirms that the Applicants have identified the relevant adopted plans and policies within their assessment. Source: SoCG meeting 05/09/2025	Agreed
FBC.OE.4	Surveys	The scope of the onshore ecology surveys (including species, survey coverage and survey effort) was appropriate. The surveys	FBC's ecological advisers (GMEU) confirm that the surveys were undertaken with the appropriate methodologies. Given FBC's	Not agreed, but not material

Reference Number	Discussion point	Applicants' position	Fylde Borough Council position	Status
		were undertaken in accordance with the appropriate methodologies.	comments regarding hydrogeological assessment of the dunes, this point remains as not agreed but not material. Source: SoCG meeting 05/09/2025	
FBC.OE.5	Baseline environment	<p>Sufficient site-specific and desktop data has been collated to appropriately characterise the baseline for onshore ecology and nature conservation to inform the EIA.</p> <p>The Applicants have undertaken an updated NVC survey of the Lytham St Annes Dunes SSSI and an NVC survey of the Old Links Golf Course BHS. The findings of the surveys will be reported at Deadline 5.</p> <p>The Applicants and FBC are both of the opinion that this item can be progressed and some matters agreed prior to the close of examination.</p>	<p>FBC has raised comments regarding surveys for sand lizards, the NVC survey of the Lytham St Annes Dunes SSSI and peat. FBC note that progress is being made on these matters and welcomes the NVC survey undertaken on the Lytham St Annes Dunes SSSI and the Old Links Golf Course. This point remains ongoing FBC has reviewed the Applicants' submissions at D5.</p> <p>The Applicants and FBC are both of the opinion that this item can be progressed and some matters agreed prior to the close of examination.</p>	Ongoing point of discussion
FBC.OE.6	Baseline environment	The Applicants have adequately characterised the baseline environment for onshore ecology and nature conservation.	This point is linked to FBC.OE.5 and remains open for discussion. FBC considers that there are some errors in habitat descriptions and some areas omitted from surveys should have been included.	Ongoing point of discussion
FBC.OE.7	Scoping	Agreement to the scoping of impacts for the EIA for onshore ecology and nature conservation.	FBC confirm their agreement on the impacts scoped into the assessment for onshore ecology and nature conservation based comments from Natural England and GMU.	Agreed

Reference Number	Discussion point	Applicants' position	Fylde Borough Council position	Status
			Source: SoCG meeting 05/09/2025	
FBC.OE.8	Biodiversity Benefit	<p>The approach for determining the Biodiversity Benefit baseline and the areas to be omitted from the baseline is appropriate.</p> <p>The Applicants also refer to the approach discussed in the Expert Working Group (dated 18/12/2023) regarding the scope of the Biodiversity Benefit surveys.</p>	FBC raised comments regarding the Applicants' approach to biodiversity benefit including the calculation of the BB identified and the carrying capacity of the BB land identified. FBC welcome the without prejudice discussion with the Applicants, however this remains a point for ongoing discussion.	Ongoing point of discussion
FBC.OE.9	Study area	The onshore ecology study area, within which desk-based and survey information is collected, is appropriate for the receptors, sites and impacts assessed.	<p>FBC confirms that the geographical extent of the onshore ecology study area is appropriate.</p> <p>Source: SoCG meeting 05/09/2025</p>	Agreed
FBC.OE.10	Project design envelope	The EIA chapter has identified, described and assessed the maximum design scenario for the EIA.	FBC generally agrees that the chapter has assessed the maximum design scenario, however FBC has raised concerns regarding works described as 'temporary'.	Ongoing point of discussion
FBC.OE.11	Assessment methodology.	The sensitivity of the onshore ecology and nature conservation receptors has been correctly identified and sufficiently described within the EIA.	As FBC has made comments regarding the baseline receptors therefore, this point remains open for discussion.	Ongoing point of discussion
FBC.OE.12	Assessment methodology	The assessment methodology for onshore ecology and nature conservation is appropriate.	FBC's advisors GMU confirm that the methodology used for the onshore ecology and nature conservation is appropriate.	Agreed
FBC.OE.13	CEA assessment methodology	The list of projects screened into the CEA in the EIA is appropriate.	FBC agree that the list of projects screened into the CEA is appropriate.	Agreed

Reference Number	Discussion point	Applicants' position	Fylde Borough Council position	Status
FBC.OE.14	Assessment of the effects from the Transmission Assets alone.	There will be no significant residual effects on nationally designated ecological sites for the impacts from the Transmission Assets alone.	Until FBC's comments relating to baseline characterisation are resolved, this matter remain under consideration	Ongoing point of discussion
FBC.OE.15	Assessment of the effects from the Transmission Assets alone.	There will be no significant residual effects on Local Nature Reserves, Ecological Networks and the majority of Biological Heritage Sites (BHS) for the impacts from the Transmission Assets alone. However, significant residual effects are predicted at the Mill Brook Valley BHS.	Whilst FBC is in general agreement, it has raised comments relating to habitat fragmentation at Lytham Moss BHS consider this matter is agreed	Ongoing point of discussion
FBC.OE.16	Assessment of the effects from the Transmission Assets alone.	There will be no significant residual effects on priority habitats, ancient woodland or veteran trees for the impacts from the Transmission Assets alone. However, significant residual effects are predicted for impacts on good quality semi-improved grassland.  The Applicants and FBC are both of the opinion that this item can be progress and some matters agreed prior to the close of examination.	This point is still subject to ongoing discussion.  The Applicants and FBC are both of the opinion that this item can be progress and some matters agreed prior to the close of examination.	Ongoing point of discussion
FBC.OE.17a	Assessment of the effects from the Transmission Assets alone.	There will be no significant residual effects on sand lizards, hydrogeology and birds	This point is still subject to ongoing discussion. Discussions around sand lizards have progressed but FBC will be raising a range of issues on the Outline Sand Lizard Management Plan at Deadline 5. FBC considers further information around hydrogeology is required, with reference to ExA Q2:7.1.1.	Ongoing point of discussion

Reference Number	Discussion point	Applicants' position	Fylde Borough Council position	Status
FBC.OE.17b	Assessment of the effects from the Transmission Assets alone	There will be no significant residual effects on other protected species for the impacts from the Transmission Assets alone.	FBC confirm that there will be no significant residual effects on other protected species from the Transmission Assets alone.	Agreed
FBC.OE.18	Assessment of the effects from the Transmission Assets cumulatively with other projects	There will be no significant effects on the majority of onshore ecology and nature conservation receptors for the impacts from the Transmission Assets when considered cumulatively with other projects. However significant effects are predicted for the Mill Brook Valley BHS and good quality semi-improved grassland.	Agreed	Agreed
FBC.OE.19	Mitigation and monitoring	The mitigation measures and monitoring outlined in Volume 3, Chapter 3: Onshore Ecology and Nature Conservation (APP-075), the Commitments Register (AS-030) and the Outline Ecological Management Plan (APP-212) are appropriate and will ensure significant effects are avoided.	FBC has comments relating to the assessment conclusions and therefore, cannot agree that the mitigation measures will ensure that significant effects will be avoided	Ongoing point of discussion
<b>Other Documents and Plans</b>				
FBC.OE.20	Outline Management Plans	The measures set out in the Outline Ecological Management Plan (APP-075) are secured in the draft DCO (AS-004) and are appropriate with regard to proposed mitigation measures and monitoring.	FBC is generally comfortable with the measures in the oEMP, however further detail is required on the measures to protect sand lizards. FBC considers that further mitigation may be needed for: landscape fragmentation effects; Lytham Moss BHS; peat; the sand dunes area; and, sand lizards.	Ongoing point of discussion

## 1.4.4 Landscape and Visual Resources

**Table 1.7: Agreement Log between the parties on Landscape and Visual Resources**

Reference Number	Discussion point	Applicants' position	Fylde Borough Council position	Status
<b>Landscape and Visual Assessment</b>				
FBC.LVR.1	Scoping	<p>The Applicants submitted a Scoping Report that described adequately the technical studies being undertaken to provide an assessment of any likely significant effects for the construction, operation and maintenance, and decommissioning phases of the Transmission Assets.</p> <p>Detail is provided in Table 10.7 of Volume 3, Chapter 10: Landscape and Visual Resources (APP-123), which outlines the comments raised by the Council, the Applicants' responses, and how these were addressed within the Environmental Statement (ES) chapter.</p>	<p>The Council agree that the Applicants submitted a Scoping Report that adequately described the technical studies being undertaken to provide an assessment of any likely significant effects for all phases of the Transmission Assets.</p> <p>The Council's comments, the Applicants' responses, and how these were adequately addressed are documented sufficiently in ES Chapter 10 (APP-123).</p>	Agreed
FBC.LVR.2	Consultation	<p>The Applicants have consulted with the Council on comments raised regarding potential impacts on landscape and visual resources, during consultation activities prior to the submission of the DCO application.</p>	<p>The Council agree that the Applicants have engaged with the Council on the comments they have raised regarding potential impacts on landscape and visual resources, prior to the submission of the DCO application.</p>	Agreed
FBC.LVR.3	Consultation	<p>The Applicants have had due regard to matters raised by the Council through statutory and non-statutory consultation to potential impacts on landscape and visual resources prior to the submission of the DCO application.</p> <p>These are detailed in Table 10.7 of Volume 3, Chapter 10: Landscape and Visual Resources (APP-123), which set out the comments raised</p>	<p>The Council agree that the Applicants have had due regard to matters raised by the Council through statutory and non-statutory consultation to potential impacts on landscape and visual resources.</p>	Agreed



Reference Number	Discussion point	Applicants' position	Fylde Borough Council position	Status
		by the Council, the Applicants' responses, and how each matter has been addressed within the ES chapter.		
FBC.LVR.4	Policy and planning		The Council disagree with the Applicants' position that the <i>Areas of Separation Policy</i> – as defined by <i>Policy GD3</i> of the <i>Fylde Local Plan to 2032 (incorporating Parital Review)</i> [FLP] – does not apply to the Transmission Assets project.	Disagree

Reference Number	Discussion point	Applicants' position	Fylde Borough Council position	Status
		<p>The Applicants' LVIA has addressed all relevant legislation, policies, and guidance within the Council's remit that pertains to landscape and visual resources and the assessment of potential impacts submitted as part of the ES, as set out in as set out in Volume 3, Annex 10.1: Landscape and visual resources local planning policy context (APP-124).</p> <p>The Applicants' position regarding the Areas of Separation Policy – as defined by <i>Policy GD3 of the Fylde Local Plan to 2032 (incorporating Parital Review)</i> (FLP) – is that it does not apply to the Transmission Assets.</p> <p>As set out in the Applicants' previous representations (REP4-108 at ISH2.18 and REP4-092, Section 1.2), the Area of Separation is a local planning policy designation intended to safeguard a well-defined space <i>between</i> settlements rather than land lying outside the mapped designation. By reference to the definition documented in the FLP, it does not extend to an undefined or unidentified exclusion zone beyond the boundaries identified on the adopted Policies Map.</p> <p>On this basis, the Applicants consider that the Transmission Assets are located <i>outside</i> of the Area of Separation and therefore <i>cannot</i>, as a matter of policy, give rise to an impact upon it.</p> <p>This position should be read in conjunction with the Applicants' submissions set out in Section 1.4.5 regarding Green Belt.</p>	<p>The Council agree that the Applicants have addressed all <i>other</i> legislation, policies, and guidance within the Council's remit that pertains to landscape and visual resources and the assessment of potential impacts.</p>	Agreed
FBC.LVR.5	Study area	<p>The study areas for each component of the Transmission Assets, determined in Volume 3,</p>	<p>The Council was consulted in 2023 and 2024 regarding the proposed representative viewpoints,</p>	Agreed

Reference Number	Discussion point	Applicants' position	Fylde Borough Council position	Status
		Chapter 10 Landscape and Visual Resources (APP-123), capture all potentially significant effects on the landscape and visual resources and designated landscapes.	<p>study areas, and visualisations for both the Preliminary Environmental Information Report (PEIR) and the ES, following submission of the Scoping Report on 28 October 2022 to the Planning Inspectorate.</p> <p>The Council acknowledges that no formal comments on the study areas were submitted following either the Scoping Report or the PEIR, prior to the submission of the ES.</p> <p>On this basis, the Council agree that the defined study areas for each component of the Transmission Assets are acceptable to capture all potentially significant effects on the landscape and visual resources and designated landscapes.</p>	
			The Council note that, during the Examination as part of the SoCG process, alternative locations for the representative viewpoint locations were proposed to the Applicant. However, the Council acknowledge that agreement on the viewpoint locations had been reached prior to the DCO submission, and incorporation of the additional views were not necessary to inform the decision making process.	Not agreed but not material.
FBC.LVR.6	Zone of Theoretical Visibility (ZTV) study	The ZTV studies, undertaken as part of the LVIA, are appropriate and effective in determining which landscape and visual receptors are likely to be affected and merit detailed consideration in the assessment of effects attributable to the onshore substations, in combination with supporting fieldwork observations.	<p>The Council was consulted in 2023 and 2024 regarding the proposed representative viewpoints, study areas, and visualisations for both the Preliminary Environmental Information Report (PEIR) and the Environmental Statement (ES), following submission of the Scoping Report on 28 October 2022 to the Planning Inspectorate.</p> <p>The Council acknowledges that no formal comments were submitted on the ZTV studies that support ES Chapter 10 (APP-123).</p>	Agreed

Reference Number	Discussion point	Applicants' position	Fylde Borough Council position	Status
			<p>Furthermore, the Council acknowledges that the Applicant provided clarification on the methodology used for the ZTV in the Applicants response to comments made by Lancashire County Council (LCC) in their <i>Local Impact Report</i> (REP1-085) – see REP1-086 7.122 of <i>Applicants' Response to Lancashire County Council Local Impact Report</i> (REP2-039).</p> <p>Therefore, the Council agree that the ZTVs presented were appropriate and effective in identifying the landscape and visual receptors likely to be affected, and in informing the scope of receptors taken forward for detailed assessment.</p>	
FBC.LVR.7	Baseline methodology	The Applicants have included all relevant and current studies and datasets in the LVIA's baseline study, which informed the subsequent assessment of effects, as recorded in Volume 3, Chapter 10 Landscape and Visual Resources.	The Council agree that the Applicants have included all relevant and current studies and datasets in the LVIA's baseline study, which informed the subsequent assessment of effects.	Agreed
FBC.LVR.8	Baseline methodology	The Applicants have complied with guidance provide in <i>PINS Advice Note Nine: Rochdale Envelope</i> ; using an approach that records the maximum and minimum design parameters to ensure that the worst-case scenarios are identified and assessed in the EIA.	The Council remain unconvinced that maximum and minimum design parameters have been properly defined and assessed.	Ongoing point of discussion
FBC.LVR.9	Site-specific Surveys	The locations of the representative viewpoints are appropriate, and the photographic survey was undertaken in accordance with the best practice guidance / methodology, adhering to the consultation conducted with the following statutory consultees: Natural England, Historic England, Preston City Council, Fylde Council, Blackpool Council, South Ribble Borough	<p>The Council was consulted in February 2024, as part of the EWG at Stakeholder Meeting 1, in relation to several site-specific survey matters.</p> <p>The consultation sought agreement on the following:</p> <p>The representative viewpoints for the onshore substations, as presented in the PEIR, acknowledging that final view orientations may be subject to micro-siting;</p>	Agreed

Reference Number	Discussion point	Applicants' position	Fylde Borough Council position	Status
		<p>Council, Fylde Borough Council, West Lancashire Borough Council.</p> <p>The Applicants proceeded with its assessment of potential effects on landscape and visual resources on the basis that the <i>Expert Working Group</i> (EWG), including the Council, agreed to the proposed representative viewpoint locations and associated visual material, confirming that it was sufficient to support a robust assessment for the purposes of the DCO application. Accordingly, no further photography was requested or captured undertaken after February 2024.</p>	<p>The representative and candidate viewpoint locations for the River Ribble crossing; and</p> <p>The presentation of grey-rendered photomontages illustrating the main buildings and associated infrastructure at the onshore substations for all agreed viewpoint locations.</p> <p>Following the meeting, the representative viewpoint locations were agreed with the relevant members of the EWG, including the Council.</p> <p>The EWG also confirmed that the proposed viewpoint locations and associated visual material were sufficient to support a robust assessment for the purposes of the DCO application. Accordingly, no further photography was undertaken.</p> <p>The Council agrees that the representative viewpoints used in the LVIA align with best practice guidance and reflect consultation with the EWG.</p>	
			<p>However, the Council considers some of the selected viewpoint photography, located close to the substations, to be 'biased' toward the Applicants' objectives and do not fairly represent of the actual views. In the Council's opinion, this is the case for Viewpoints 2, 3 and 12.</p> <p>This remains a position of disagreement.</p>	Disagree
FBC.LVR.10	Assessment methodology	The methodology for assessment of landscape and visual resources has been undertaken in accordance with best practice guidance within GLVIA3 (Landscape Institute and IEMA, 2013), drawing upon other best practice guidance, where relevant.	The Council agrees that the methodology for assessment of landscape and visual resources has been undertaken in accordance with best practice guidance within GLVIA3 (Landscape Institute and IEMA, 2013), drawing upon other best practice guidance, where relevant.	Agreed

Reference Number	Discussion point	Applicants' position	Fylde Borough Council position	Status
FBC.LVR.11	Assessment methodology	The sensitivity criteria - covering value, susceptibility, integrity and capacity - for landscape and visual resources have been correctly identified and sufficiently described within Volume 3, Chapter 10 Landscape and Visual Resources (APP-123).	The Council agrees that the sensitivity criteria for landscape and visual resources have been correctly identified and sufficiently described in ES Chapter 10 (APP-123), with the exception of matters relating to Areas of Separation (see FBC.LVR.4).	Agreed
FBC.LVR.12	Assessment methodology	The magnitude of impact criteria for landscape and visual resources have been correctly identified and sufficiently described within Volume 3, Chapter 10 Landscape and Visual Resources (APP-123).	The Council agrees that the magnitude of impact criteria for landscape and visual resources have been correctly identified and sufficiently described in ES Chapter 10 (APP-123).	Agreed
FBC.LVR.13	Assessment methodology	The significance of effects upon landscape and visual resources has been correctly determined and sufficiently described within Volume 3, Chapter 10 Landscape and Visual Resources (APP-123).	<p>The Council agrees that the significance of effects upon landscape and visual resources has been correctly determined and sufficiently described in ES Chapter 10 (APP-123).</p> <p>However, while reassured by the Applicants – through SoCG discussions and their written submissions – and ExA position during ISH2, that sub-EIA-significance-threshold effects are not automatically disregarded and have informed decisions on design, mitigation, and overall scheme evaluation, <u>the Council remains concerned</u> that such effects may be overlooked in the final decision-making process.</p>	Ongoing point of discussion
FBC.LVR.14	Assessment methodology	The assumptions and limitations of Volume 3, Chapter 10 Landscape and Visual Resources (APP-123) are fair and reasonable.	The Council agrees that the assumptions and limitations of ES Chapter 10 (APP-123) are fair and reasonable.	Agreed
FBC.LVR.15	Baseline environment	Volume 3, Chapter 10 Landscape and Visual Resources (APP-123) correctly identified and describes all relevant landscape and visual resources – regarding landscape character, visual receptors and designated landscapes –	The Council agrees that the Applicants have correctly identified and describes all relevant landscape and visual resources – regarding landscape character, visual receptors and designated landscapes - which could be affected by the components of the Transmission Assets.	Ongoing point of discussion

Reference Number	Discussion point	Applicants' position	Fylde Borough Council position	Status
		which could be affected by the components of the Transmission Assets.	The Council considers that inadequate consideration has been given to the of the function of the Area of Separation. The Council also considers that the Applicants have not adequately documented every aspect of the landscape, resulting in an underrepresentation of potential impacts within the Transmission Assets study areas. This remains a position of disagreement.	
FBC.LVR.16	Future Baseline	Volume 3, Chapter 10 Landscape and Visual Resources (APP-123) has provided a reasonable outline of the likely future baseline conditions in the absence of the Transmission Assets.	The Council agrees that the Applicants have provided a reasonable outline of the likely future baseline conditions in the absence of the Transmission Assets.	Agreed
FBC.LVR.17	Scope of the Assessment	Volume 3, Chapter 10 Landscape and Visual Resources (APP-123) has adhered to the scope of the ES that was developed, and agreed to, in consultation with relevant statutory and non-statutory consultees; reporting on the impact of the onshore elements of the Transmission Assets on landscape character and on publicly accessible views during the construction, operation and maintenance and decommissioning phase.	The Council agrees that the Applicants have adhered to the scope of the ES that was developed, and agreed to, in consultation with relevant statutory and non-statutory consultees; reporting on the impact of the onshore elements of the Transmission Assets on landscape character and on publicly accessible views during all phases.	Agreed
FBC.LVR.18	Project design envelope	Volume 3, Chapter 10 Landscape and Visual Resources (APP-123) has identified, described and assessed the maximum design scenario in the EIA for relevant landscape and visual resources potentially affected by the Transmission Assets.	The Council is concerned that the level of information is insufficient to ensure that the maximum design scenario has been properly assessed. The Council considers that it is also important that the assessment is ongoing to reflect the effects (negative and positive) as detail becomes available.	Ongoing point of discussion
FBC.LVR.19	Assessment of effects	Volume 3, Chapter 10 Landscape and Visual Resources (APP-123) provides an assessment of the potential residual effects that could arise from the Transmission Assets, which has	The Council is concerned that the level of information is insufficient to ensure that an assessment of the potential residual effects can be properly carried out.	Ongoing point of discussion

Reference Number	Discussion point	Applicants' position	Fylde Borough Council position	Status
		included an assessment on relevant landscape and visual resources, during the daytime and night, and during the construction / decommissioning phase and the operation / maintenance phase.		
FBC.LVR.20	Assessment of potential effects during construction	<p>Volume 3, Chapter 10 Landscape and Visual Resources (APP-123) has assessed that short-term significant effects (in EIA terms) would arise from Transmission Assets during the construction phase on the following landscape and/or visual resources:</p> <p><u>Landscape Character</u></p> <p>LCA 19a: Coastal Dunes – Fylde Coastal Dunes (landfall); and</p> <p>LCA 15d: Coastal Plain – Fylde (onshore substations)</p> <p><u>Visual Receptors</u></p> <p>Viewpoint 1 bridleway BW0505016 south of Morgan onshore substation site;</p> <p>Viewpoint 3 bridleway BW0505016 west of Morgan onshore substation;</p> <p>Viewpoint 6 footpath FP050503 south of Morecambe onshore substation site;</p> <p>Sequential effects on people using PRoW BW0505016, FP050503 and FP050504;</p> <p>People using beach;</p> <p>People using Blackpool Road Recreation Ground;</p> <p>People using PRoW BW0502012, BW0502013, BW0502016, BW0503012, FP050302, FP05010011, FP050304,</p>	<p>The Council disagrees that the Applicants have fairly identified the short-term significant effects (in EIA terms) arising from the construction phase of the Transmission Assets on the listed landscape and visual receptors.</p> <p>The Council is concerned that matters relating to threshold for significance have not been properly address (see FBC.LVR.13).</p> <p>The Council emphasises that the substations will have a significant impact on the surrounding landscape, affecting residents, workers, and visitors in their local vicinities, as described in the Council's written submissions at Deadlines 1 to 4.</p>	Ongoing point of discussion



Reference Number	Discussion point	Applicants' position	Fylde Borough Council position	Status
		<p>FP050305, FP050502, BW0509012, FP00905, FP070907 and FP0709010 (export and 400 kV cables);</p> <p>People using National Cycle Route 62 at Hillock Lane (export cable); and</p> <p>Occupiers of residential properties at Bridge Farm, Bridge Hall Farm, Moss Side Farm, The Old Dairy, Hillock Cross Farm, Savick Brook, Farm and Marsh Farm (export and 400 kV cables)</p> <p>No other significant effects on landscape character or visual receptors would arise during the construction of the Transmission Assets.</p>		
FBC.LVR.21	Assessment of potential effects during operation	<p>Volume 3, Chapter 10 Landscape and Visual Resources (APP-123) has assessed that long-term significant effects (in EIA terms) * would arise from the Transmission Assets during the operation phase on the following landscape and/or visual resources:</p> <p><u>Landscape Character</u></p> <p>LCA 15d: Coastal Plain – Fylde (Year 1 before landscape mitigation planting has established).</p>	<p>The Council disagrees that the Applicants have fairly identified the long-term significant effects (in EIA terms) arising from the operation phase of the Transmission Assets on the listed landscape and visual receptors.</p> <p>The Council is concerned that matters relating to threshold for significance have not been properly address (see FBC.LVR.13).</p>	<i>Ongoing point of discussion</i>

Reference Number	Discussion point	Applicants' position	Fylde Borough Council position	Status
		<p><u>Visual Receptors</u></p> <p>Sequential effects on people using PRoW BW0505016, FP050503 and FP050504 (Year 1 before landscape mitigation planting has established).</p> <p>No other long-term significant effects on landscape character or visual receptors would arise during the operation of the Transmission Assets</p> <p><i>* For the purpose of the LVIA, any effects with a significance level of moderate or less are not considered to be significant, as detailed in Volume 3, Annex 10.4: Landscape and visual impact assessment methodology (APP-127).</i></p>	The Council emphasises that the substations will have a significant impact on the surrounding landscape, affecting residents, workers, and visitors in their local vicinities, as described in the Council's written submissions at Deadlines 1 to 4.	
FBC.LVR.23	CEA scope	The list of projects screened into the Cumulative Effects Assessment (CEA) in the EIA is appropriate.	The Council agrees that the Applicants have adequately screened into the CEA all relevant projects.	Agreed
FBC.LVR.24	CEA methodology	The assessment methodology for the CEA of landscape and visual resources has been undertaken in accordance with best practice guidance, as set in Section 5.4.9 Cumulative effects assessment Volume 1, Chapter 5: Environmental assessment methodology (APP-034).	The Council agrees that the assessment methodology for the CEA has been undertaken in accordance with best practice guidance.	Agreed
FBC.LVR.25	CEA	Volume 3, Chapter 10 Landscape and Visual Resources (APP-123) has presented a comprehensive assessment of the potential cumulative effects that could arise from the Transmission Assets in combined with other relevant projects, within the LVIA's studies areas. This assessment has included an assessment on relevant landscape and visual	The Council is concerned that the assessment does not give sufficient consideration to the effects of the substations on AOS and landscape character of the area around Newton with Scales.	Ongoing point of discussion

Reference Number	Discussion point	Applicants' position	Fylde Borough Council position	Status
		resources, during the daytime and night, and during the construction/decommissioning phase and the operation/maintenance phase.		
FBC.LVR.26	CEA	<p>Volume 3, Chapter 10 Landscape and Visual Resources (APP-123) has assessed that significant effects (in EIA terms), would arise from the Transmission Assets in combination with other schemes during the short-term construction phase on the following landscape and/or visual resources:</p> <p><u>Visual Receptors</u></p> <p>People using PRow, with the Transmission Assets making a medium to negligible contribution to cumulative effect.</p> <p>Occupiers of residential properties, with the Transmission Assets making a medium to negligible contribution to cumulative effect.</p>	The Council disagrees that the Applicants have fairly identified the significant effects (in EIA terms) arising from the Transmission Assets in combination with other schemes during the short-term construction phase on the listed landscape and visual receptors.	Ongoing point of discussion
<b>Outline Design Principles, Outline Mitigation and Landscape Proposals</b>				
FBC.OMLP.1	Measures (commitments)	The mitigation measures and monitoring outlined in Volume 3, Chapter 10 Landscape and Visual Resources (APP-123), the Commitments Register (AS-030), and the Outline Landscape Management Plan (APP-208) are appropriate in the environmental mitigation of potential effects arising from the onshore substations.	<p>The Council disagrees with the Applicants' position, considering the proposed mitigation and monitoring measures to be inadequate for addressing potential environmental effects from the onshore substations.</p> <p>The Council considers that there has been insufficient consideration of the effects of the substations and how design can help to mitigate them. Reliance on planting alone is insufficient mitigation in this instance.</p> <p>The ongoing engagement programme on the outline Design Principles (APP-209) document and related documents is intended to resolve this disagreement.</p>	Ongoing point of discussion

Reference Number	Discussion point	Applicants' position	Fylde Borough Council position	Status
FBC.OMLP.2	Outline Management Plans	The measures set out in the Outline Landscape Management Plan (document reference J1, REP4-062)) are secured in the draft DCO (document reference C1, REP5-010) and are appropriate regarding proposed mitigation measures and monitoring.	<p>The Council disagrees with the Applicants' position, considering the proposed mitigation measures and monitoring – submitted in response to ExQ 13.1.6 (REP-082) – to be insufficient for addressing potential environmental effects from the onshore substations. The ongoing engagement programme on the Outline Design Principles and related documents aims to resolve this disagreement.</p> <p>Furthermore, the Council reiterates that the substations will significantly affect the surrounding landscape, impacting residents, workers, and visitors, and refers to its position at FBC.LVR.13, which states that all recorded effects should be considered in the final decision-making process.</p>	Ongoing point of discussion
FBC.OMLP.3	Outline Design Principles	The oDP (document reference J3, REP5-064) sets out the design processes for all aspects of the Projects, following best practice guidance.	<p>In its response to the Examining Authority's written question ExQ 13.1.5 (REP3-082), the Council states that:</p> <p><i>"...the Outline Development Principles are high-level and generic and that any such document should be informed by more detailed information, consultation and creation of a well-reasoned design strategy."</i></p> <p>Accordingly, the Council presently disagrees with the Applicants' position, considering that the Design Principles and Design Coding set out in the Outline Design Principles document (APP-209) to provide sufficient design governance for the discharge of requirements post-consent.</p> <p>The ongoing engagement programme on the outline Design Principles (document reference J3, REP5-064) document and related documents is intended to resolve this disagreement.</p>	Ongoing point of discussion

Reference Number	Discussion point	Applicants' position	Fylde Borough Council position	Status
FBC.OMLP.4	Outline Design Principles	The ODP is a certified document prepared to support the governance of post consent design and inform the discharge of relevant requirements with specific reference to Section 5 and 6	FBC have provided comments to the Applicants and will continue to pro-actively engage with them on this matter.	Ongoing point of discussion
FBC.OMLP.5	Outline Design Principles	The Project Level Design Principles and Design Codes – set out in Sections 5 and 6 of the oDP (document reference J3, REP5-064) have been prepared in consultation with the Council and are agreed.	FBC have provided comments to the Applicants and will continue to pro-actively engage with them on this matter.	Ongoing point of discussion
FBC.OMLP.6	Outline Design Principles	The <u>indicative</u> post consent programme – set out in Section 6 of the oDP (document reference J3, REP5-064) – establishes a satisfactory process to support delivery of good design.	FBC have provided comments to the Applicants and will continue to pro-actively engage with them on this matter.	Ongoing point of discussion
FBC.OMLP.7	Outline Design Principles	The appointment of a Design Champion for each Applicant is supported and will benefit the delivery of good design, post consent.	FBC have provided comments to the Applicants and will continue to pro-actively engage with them on this matter.	Ongoing point of discussion
FBC.OMLP.8	Outline Design Principles	The commitment to the preparation of a Compliance Report to be submitted in support of Requirements discharge is supported.	FBC have provided comments to the Applicants and will continue to pro-actively engage with them on this matter.	Ongoing point of discussion
FBC.OMLP.9	Outline Design Principles	<p>It is not considered necessary to impose an Independent Design Review Panel (IDRP) on the Council at this stage.</p> <p>Any requirement for an IDRP should be determined post-consent by the Council, in consultation and agreement with the Applicants.</p> <p>The Applicants are committed to continued engagement with FBC as part of the post-consent design process. The oDP establishes</p>	FBC have provided comments to the Applicants and will continue to pro-actively engage with them on this matter.	Ongoing point of discussion

Reference Number	Discussion point	Applicants' position	Fylde Borough Council position	Status
		governance protocols and processes to support FBC in discharging Requirement 4 of Schedules 2A and 2B (of the dDCO) in relation to substation design with an indicative approach to a design development programme, enhanced Project Level Design Principles and Design Codes – see Section 6 of the oDP.		

## 1.4.5 Green Belt and Area of Separation

**Table 1.8: Agreement Log between the parties on Green Belt and Area of Separation**

Reference Number	Discussion point	Applicants' position	Fylde Borough Council position	Status
<b>Green Belt</b>				
<b>Site Selection</b>				
FBC.GB.1	Site Selection	The Applicants have undertaken a site selection exercise which demonstrates that the Green Belt cannot be avoided in its entirety due to the Point of Interconnection to the Grid at Pentwortham Substation.	<p>FBC recognise that a site selection exercise has been undertaken but maintain disagreement as to the methodology and consider that Green Belt should have been factored in as a constraint at an earlier stage of the process.</p> <p>In relation to cable routing, FBC acknowledge that Green Belt could not be avoided in its entirety in connecting the landfall location to Penwortham Substation. However, FBC consider that the extent to which Green Belt is to be affected could be mitigated.</p> <p>In relation to the substation locations, FBC consider that Green Belt should have been identified as a constraint at an earlier stage of the process, and that the Applicants should have tried to identify independent (rather than co-located) sites for the substations which were outside the Green Belt.</p>	Not agreed
FBC.GB.2	Site Selection	The process to identify suitable sites for the required onshore substations commences with a 5km search zone drawn around the Penwortham Substation. Based on previous project experience and technical and commercial feasibility, this radius was used to minimise the length of the 400kV grid connection cables that would link the new substations to the POI, minimise cable reactive	<p>As noted above, FBC consider the site selection process for identifying suitable sites for the substations is flawed because Green Belt should have been identified as a constraint at an earlier stage of the process.</p> <p>FBC consider that proper consideration of separate, independent sites for the substations (geographically separate, not co-located sites) in</p>	Not agreed

Reference Number	Discussion point	Applicants' position	Fylde Borough Council position	Status
		power issues, mitigate transmission losses and to minimise adverse effects on economic efficiency. Due to environmental constraints identified in the first stage, this radius was increased to 8km due to a lack of suitable sites.  This search radius for the location of the substations is justified.	areas outside the Green Belt has not been given in site selection.	
FBC.GB.3	Site Selection	The Applicants have provided reasoned justification to explain why the substations cannot be co-located on a single site.  Co-locating the substations within a single site would result in no efficiencies of scale and would result in a larger, more harmful feature in the landscape, than two individual substations.	In principle it is agreed.  However, FBC note that they have not advocated for the substations to be co-located within a single site. If this were to become a point of discussion, additional justification and evidence would be needed to support this narrative.	Agreed
<b>Policy</b>				
FBC.GB.4	Policy and Planning	The Applicants have appropriately identified and considered all plans and policies relevant to the Green Belt within FBC's remit in the Application.	This is agreed.	Agreed
FBC.GB.5	Policy and Planning	The Application falls to be determined under s104 of the Planning Act 2007 and that NPS EN-1, along with the relevant technology specific NPSs (in this case, EN-3 and EN-5) will be the primary policy for decision making by the Secretary of State.	This is agreed.	Agreed
FBC.GB.6	Policy and Planning	Whilst the Application must be determined in accordance with the relevant NPSs under s104, regard must also be had to any other matters of importance and relevance. This may include relevant policies, guidance and strategy documents within the NPPF and local development plans.	This is agreed.	Agreed



Reference Number	Discussion point	Applicants' position	Fylde Borough Council position	Status
FBC.GB.7	Policy and Planning	The fundamental aim of Green Belt, namely to ' <i>to prevent urban sprawl by keeping land permanently open</i> ' and the essential characteristics of 'openness and permanence' as set out in paragraph 142 of NPPF 2025 are clear and agreed	This is agreed.	Agreed
FBC.GB.8	Policy and Planning	Green Belt is a land use/ spatial policy designation and not a landscape designation.  It is not a landscape designation for an area that has been identified as a landscape of higher value than an 'ordinary, everyday landscape', as per guidance set out in GLVIA3.	This is agreed.	Agreed
FBC.GB.9	Policy and Planning	The 'openness' of Green Belt is capable of having both spatial and visual elements.	This is agreed, although FBC note that spatial and visual openness work in synergy and should not be considered in isolation in decision making.	Agreed
FBC.GB.10	Policy and Planning	When considering 'spatial' openness, the relevant factors are scale, form and density of built development.  'Openness' does not imply a freedom from any built form.	This is agreed, although FBC note that spatial and visual openness work in synergy and should not be considered in isolation in decision making.	Agreed
FBC.GB.11	Policy and Planning	When considering 'visual' openness, consideration is given to the role of topography, vegetation, buildings, linear features in maintaining or screening open views of the wider Green Belt.	This is agreed, although FBC note that spatial and visual openness work in synergy and should not be considered in isolation in decision making.	Agreed
FBC.GB.12	Policy and Planning	The Supreme Court in <i>Samuel Smith Old Brewery (Tadcaster) and Others v North Yorkshire County Council [2020]</i> held that the consideration of the visual impacts of a development on openness '...is a matter not of legal principle, but of planning	FBC agree with this position, however, note that visual openness forms part of a suite of considerations which could include contextual site	Agreed

Reference Number	Discussion point	Applicants' position	Fylde Borough Council position	Status
		judgement' (paragraph 25) and that, whilst decision makers are not obliged by law to consider visual impacts, they may form a material consideration.	specific and development factors (ie. heritage, landscape character etc).	
FBC.GB.13	Policy and Planning	The presence of vegetation and landform are capable of providing visual enclosure to a development which may mitigate its impacts on spatial and visual openness; and by extension, reduce/ mitigate harm by inappropriateness and any other harm (in relation to landscape and visual effects), on the Green Belt through design.	FBC do not disagree with the principle that vegetation and landform are capable of providing visual enclosure which may mitigate impacts on openness, but dispute the extent to which the existing and proposed planting and landform will mitigate impacts in this instance.	Agreed
<b>Function and Purposes of the Green Belt</b>				
FBC.GB.14	Function and Purpose	The five purposes of the Green Belt are as defined in paragraph 143 of the NPPF 2025.	This is agreed.	Agreed
FBC.GB.15	Function and Purpose	The purposes of Green Belt that have relevance to this Application are a) <i>'to check the unrestricted sprawl of large built up areas'</i> and c) <i>'to safeguard the countryside from encroachment'</i> .	FBC note that purpose a) and c) were identified early as being the purposes of relevance, but question whether purpose b) ought to be included due to the significant pressures for growth in Freckleton (see FBC.GB.17).	Agreed
FBC.GB.16	Function and Purpose	Purpose c) <i>'to safeguard the countryside from encroachment'</i> is the principal issue to be addressed.	This is agreed.	Agreed
FBC.GB.17	Function and Purpose	Purpose b) <i>'to prevent neighbouring towns merging together'</i> is not of relevance to this application because whilst Kirkham is a 'town', Freckleton and Newton with Scales are 'villages'.  This approach aligns with Planning Policy Guidance relating to Green Belt, which states at Paragraph 005 Reference ID: 64-005-20250225 that, <i>'This purpose [b)] relates to the merging of towns, not villages'</i> .	FBC acknowledge that Kirkham is a town and Freckleton is a village, and that PPG guidance stipulates that purpose b) relates to the merging of towns not villages.  However, FBC note that Freckleton is an extended urban area subject to significant pressures for growth.	Agreed

Reference Number	Discussion point	Applicants' position	Fylde Borough Council position	Status
FBC.GB.18	Function and Purpose	The remaining purposes as set out in paragraph 143 of the NPPF, namely: d) <i>'to preserve the setting and special character of historic towns'</i> and e) <i>'to assist in urban regeneration, be encouraging the recycling of derelict and other urban land'</i> are not considered to be of material relevance to this Application.	This is agreed.	Agreed.
FBC.GB.19	Function and Purpose	Despite the presence of Blackpool Airport, the primary purpose of the Green Belt in the area between Blackpool and St Annes is to provide a clear and separating function between the built-up settlements, and to demarcate the authority boundary between Blackpool and Fylde.	This is agreed.	Agreed.
FBC.GB.20	Function and Purpose	The primary function of the area of Green Belt between Kirkham and Freckleton, is to protect the area of land which extends north-south between these two settlements and their settlement boundaries.  The Green Belt does not extend to settlement boundaries, in an east-west direction.	This is agreed.	Agreed
<b>Harm to Green Belt</b>				
FBC.GB.21	Policy and Planning	Development must be within Green Belt to harm it. Green Belt does not have a setting or a buffer zone of influence.	This is agreed.	Agreed.
<b>Inappropriate Development</b>				

Reference Number	Discussion point	Applicants' position	Fylde Borough Council position	Status
FBC.GB.22	Policy and Planning	Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances. 'Very special circumstances' will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations (paragraph 153 of NPPF 2025).	This is agreed.	Agreed
FBC.GB.23	Policy and Planning	Paragraphs 154 and 155 of the NPPF provide specific exceptions where development in the Green Belt will not be considered to be inappropriate.	This is agreed.	Agreed
FBC.GB.24	Policy and Planning	The exceptions in paragraph 154 only apply where the development proposed will preserve the openness and not conflict with the purposes of the Green Belt.	This is agreed.	Agreed
FBC.GB.25	Assessment	The underground onshore export cables and 400kv grid connection cables of the Transmission Assets which would in part traverse areas of Green Belt comprise ' <i>engineering operations</i> ' for the purposes of paragraph 154 h) ii) and are not considered to be 'inappropriate development'.	This is agreed.	Agreed.
FBC.GB.26	Assessment	Temporary construction compounds are also considered to be ' <i>engineering operations</i> ' for the purposes of NPPF paragraph 154.	This is agreed.	Agreed

Reference Number	Discussion point	Applicants' position	Fylde Borough Council position	Status
		Temporary construction compounds are however not considered to benefit from the exception under paragraph 154 in this instance (and are therefore ' <i>inappropriate development</i> ') as the scale and duration of the works may result in short-term harm to the openness of the Green Belt and represent some encroachment into the countryside, contrary to purpose c) of NPPF paragraph 143.	FBC acknowledge that the EIA is based on a worst-case scenario in relation to construction time lime (ie. the sequential rather than concurrent construction of the projects).	Agreed
			FBC consider the use of the term 'short term' in the EIA to mischaracterise the potential duration and impact of effects on the local community experience.	Not agreed
FBC.GB.27	Assessment	As land used for temporary compounds will be reinstated upon completion, the significance of the harm to be caused to the Green Belt by these elements, is mitigated by the transitory and fully reversible nature of the impacts in the Applicants' opinion.	This cannot be agreed as FBC maintain reservations that the Project Commitments do not ensure the ' <u>fully</u> ' reservable nature of the impacts. The unknown construction programme, timing and duration of works, and the fact that some habitats and environments may not be capable of <u>full</u> reinstatement mean that FBC consider that these impacts to areas in the Green Belt used for temporary compounds may not be ' <u>fully</u> ' transitory or reversible.	Not agreed
FBC.GB.28	Assessment	As the construction compounds will cause no permanent harm to the openness and purposes of the Green Belt, the relatively short-term harm to be caused by the construction compounds should be	As above, as FBC have reservations that the Project Commitments cannot ensure the ' <u>fully</u> ' reservable nature of the impacts, and that some habitats or environments may not be capable of full reinstatement.	Not agreed

Reference Number	Discussion point	Applicants' position	Fylde Borough Council position	Status
		given limited, if any, weight in the determination of the Application		
FBC.GB.29	Assessment	The substations are considered to be inappropriate development, which is by definition harmful to the Green Belt and should not be approved except in Very Special Circumstances.	This is agreed.	Agreed
<b>Assessment Methodology</b>				
FBC.GB.30	Assessment	The methodology used to assess the current performance of each area of the Green Belt to be impacted by the Transmission Assets, as set out in Appendix B of the Green Belt Technical Note (F02) submitted at D4 (REP4-092) is suitable.	<p>FBC agree that the methodology used to assess the current performance of each area of the Green Belt, set out in Appendix B, is suitable. However, FBC do not necessarily agree with the outcomes of the Applicants' assessment.</p> <p>As noted in REP5-170, paragraphs 2.2.6-2.2.9, FBC specifically disagree with the Applicants' assessment of the impact HMP Kirkham and the development along Lower Lane has on the existing openness of the Green Belt between Kirkham and Freckleton. Whilst it is acknowledged these features encroach spatially into the Green Belt, it is not agreed that they impact visual openness to the extent attributed by the Applicants.</p>	Agreed
FBC.GB.31		The methodology used to assess the extent to which the Transmission Assets may impact upon the openness and purposes of each area of the Green Belt, by reason of inappropriateness or any other harm, during both the construction and operational phases of the projects, as set out in Appendix C of the Green Belt Technical Note (F02) submitted at D4 (REP4-092) is suitable.	<p>FBC agree that the methodology set out in Appendix C is suitable.</p> <p>However, as noted in REP5-170, FBC do not necessarily agree with the outcomes of the Applicants' assessment. Concerns relate specifically to the spatial and visual harm to the Green Belt to be caused by the proposed substations and their ancillary features, the unknown duration and timing of the construction</p>	Agreed

Reference Number	Discussion point	Applicants' position	Fylde Borough Council position	Status
			programme and concerns relating to reinstatement (see FBC.GB.27).	
<b>Scale of Harm</b>				
FBC.GB.31	Assessment	As the construction compounds will cause no permanent harm to the openness and purposes of the Green Belt, the relatively short-term harm to be caused by the construction compounds should be given limited, if any, weight in the determination of the Application.	FBC agree that no permanent harm will be caused to the openness and purposes of the green belt.	Agreed
			However, the lack of certainty in relation to the duration of the construction phases is considered to be a matter of significance in relation to communities and should be given greater than limited weight in determination.	Not agreed, but not material to Green Belt
FBC.GB.33	Assessment	Substations partly comprise ' <i>engineering operations</i> ', but as they will also include buildings and their scale and duration will impact openness and purposes of the Green Belt, they are considered inappropriate development for the purposes of paragraph 153 of the NPPF 2025.	This is agreed.	Agreed
FBC.GB.34	Assessment	The harm to the Green Belt by reason of inappropriateness and other identified harms, principally relates to the scale of proposed built form and the buildings within the substations leading to a reduction in openness and encroachment into the countryside.	FBC consider that elevated levels of harm result from close location/ concentration of built form.	Agreed
FBC.GB.35	Assessment	'Other harms' are considered to principally comprise the following: landscape and visual	FBC agree that these are the main issues raised in the EIA, but note that impacts to Tourism and Human Health are also relevant.	Agreed

Reference Number	Discussion point	Applicants' position	Fylde Borough Council position	Status
		impacts and impacts to amenity, biodiversity and highways.		
FBC.GB.37	Assessment	The harm caused by the substations can be reduced and mitigated through good design, proposed planting and embedded mitigation.	It is agreed that opportunities enhanced mitigation are possible through post-consent discussion and ongoing design development.	Agreed
<b>Critical National Priority Infrastructure</b>				
FBC.GB.38	Policy and Planning	The Transmission Assets comprise Critical National Priority Infrastructure as defined in NPS EN-1.	This is agreed.	Agreed
FBC.GB.39	Policy and Planning	The Applicants have applied the mitigation hierarchy in relation to the site selection process.	FBC agree that the Applicants have taken a recognisable approach to the application of the mitigation hierarchy in the site selection process.	Agreed
		In relation to cable routing, it is agreed that Green Belt cannot be avoided in its entirety.	This is agreed.	Agreed
		In relation to the substations, a site selection exercise was undertaken which demonstrates that these could not reasonably be sited outside the Green Belt.	FBC consider that Green Belt should have been considered earlier in the site selection process, and that opportunities to located the substations separately (not co-located within the same Zone) were not considered.	Not Agreed
FBC.GB.40	Policy and Planning	The starting point for decision making by the Secretary of State in relation to CNP Infrastructure is that the test of very special circumstances is presumed to be met if the mitigation hierarchy has been applied.	This is agreed.	Agreed
<b>Very Special Circumstances</b>				
FBC.GB.41	Assessment	Very special circumstances exist to justify the location of elements of the Transmission Assets in the Green Belt which include the wider	FBC agree in principle that a case of very special circumstances can be built upon the generation of renewable energy.	Agreed



Reference Number	Discussion point	Applicants' position	Fylde Borough Council position	Status
		environmental benefits associated with increased production of energy from renewable sources for the purposes of NPPF Paragraph 160	FBC do not dispute the VSC identified in Section 1.7 of REP4-092.	
			However, FBC consider that the site election process did not consider Green Belt early enough, and as such do not consider the identification of VSC to be warranted because potentially alternative not co-located substation sites outside the Green Belt were not considered as part of the methodology.	Not Agreed
FBC.GB.42	Assessment	The very special circumstances, which include the significant benefits of increased production of energy from renewable sources outweigh the significant weight of any harm to be caused to the Green Belt by virtue of inappropriate development and any other harm.	This is not agreed, because FBC do not consider that potential locations for the substations outside the Green Belt were sufficiently considered in the site selection process followed.	Not Agreed
<b>Area of Separation</b>				
<b>Policy</b>				
FBC.GB.43	Policy and planning	Local Area of Separation policy is distinct from national Green Belt policy.	This is agreed.	Agreed
FBC.GB.44	Policy and planning	Development must be within an Area of Separation to harm it.  Areas of Separation do not have an undefined and unidentified exclusion zone beyond the borders of the policy area, as defined in the Local Plan Policies Map (see REP4-108, ISH2.18).	The FBC disagrees with the Applicants' position. The Council consider that there is no policy requirement for development to be inside an Area of Separation to impact it.	Not agreed.
FBC.GB.45	Policy and planning	Following changes to the scheme design following the PIER Report, no part of the Transmission	This is agreed.	Agreed

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Reference Number	Discussion point	Applicants' position	Fylde Borough Council position	Status
		Assets lies within the Area of Separation designation.		

## 1.4.6 Land Use and Recreation

**Table 1.9: Agreement log between the parties on Land Use and Recreation (noting that tourism-related aspects of recreation are considered in the Socio-economic section (1.4.9) of this SoCG)**

Reference Number	Discussion point	Applicants' position	Fylde Borough Council position	status
<b>EIA</b>				
FBC.LUR.1a	Consultation	The Applicants have undertaken adequate consultation with FBC on potential impacts on land use and recreation.	Whilst FBC have raised comments regarding the overall adequacy of consultation undertaken by the Transmission Assets project (AoC-008) FBC agree confirm that the consultation for land use and recreation has been adequate.  Source: SoCG meeting 05/09/2025	Agreed
FBC.LUR.1b	Consultation	The EIA has had due regard to matters raised by FBC through statutory and non-statutory consultation on potential impacts on land use and recreation.  The Applicants and FBC are both of the opinion that this item can be progressed and some matters agreed prior to the close of examination.	FBC has raised a number of comments in its submissions, relating to land use and recreation. Some of these concerns remain under discussion.  The Applicants and FBC are both of the opinion that this item can be progressed and some matters agreed prior to the close of examination.	Ongoing point of discussion
FBC.LUR.2	Policy and planning	The Application has identified and considered the plans and policies relevant to land use and recreation, within FBC's remit.	Notwithstanding that it has made some comments regarding guidance and data, FBC confirms that the Applicants have identified the relevant adopted plans and policies within their assessment.  Source: SoCG meeting 05/09/2025	Agreed

Reference Number	Discussion point	Applicants' position	Fylde Borough Council position	status
FBC.LUR.3	Surveys	The scope and coverage of the soil and agricultural land classification (ALC) surveys was appropriate. The surveys were undertaken in accordance with the appropriate methodologies.	FBC defer to Natural England's position that further soil surveys are required to inform the restoration of agricultural land.	Not Agreed
FBC.LUR.4	Surveys	The scope and coverage of the recreation surveys was appropriate	FBC agree that the scope of the recreation surveys (excluding the tourism-related surveys) was appropriate	Agreed
FBC.LUR.5a	Baseline environment	The Applicants have adequately characterised the baseline environment for land use.  The Applicants explained that the Grade 3 category (used in published ALC data) does not distinguish between Grade 3a and Grade 3b. Where detailed soil surveys were not undertaken on Grade 3 land, the characterisation of the baseline has adopted a precautionary approach and assumed the higher grade of land (Grade 3a).	FBC has unresolved comments relating to the scope and coverage of soil surveys and therefore, the characterisation of the baseline relating to ALC is an ongoing point of discussion.	Not agreed
FBC.LUR.5b	Baseline environment	The Applicants have adequately characterised the baseline environment for recreation  Fylde Borough Council has provided comments to the Applicants and both parties will continue to engage on this matter.	Fylde Borough Council has provided comments to the Applicants and both parties will continue to engage on this matter.	Ongoing point of discussion

Reference Number	Discussion point	Applicants' position	Fylde Borough Council position	status
FBC.LUR.6	Scoping	Agreement to the scoping of impacts for the EIA for land use and recreation.	FBC confirm their agreement on the impacts scoped into the assessment for land use and recreation. Source: SoCG meeting 05/09/2025	Agreed
FBC.LUR.7	Study area	The EIA study area is appropriate for the receptors, sites and impacts assessed.	FBC confirms that the geographical extent of the land use and recreation study area is appropriate. Source: SoCG meeting 05/09/2025	Agreed
FBC.LUR.8	Project design envelope	The EIA chapter has identified, described and assessed the maximum design scenario for the EIA.	FBC has raised comments over the timing, durations and frequency of the construction impacts and how they have been assessed.	Ongoing point of discussion
FBC.LUR.9a	Assessment methodology.	The sensitivity of the land use receptors has been correctly identified and sufficiently described within the EIA.	FBC has raised comments regarding the sensitivity of agricultural land, which remain under discussion.	Ongoing point of discussion
FBC.LUR.9b	Assessment methodology	The sensitivity of the recreation receptors has been correctly identified and sufficiently described within the EIA.	Pending their review of the Applicants' Local Tourism Assessment, FBC considers that the sensitivity of the public access network has been correctly identified and sufficiently described within the EIA.	Ongoing point of discussion
FBC.LUR.10	Assessment methodology	The assessment methodology for land use and recreation is appropriate.	Whilst FBC considers that the overall assessment methodology is appropriate, the assessment of ALC and agricultural impacts remain under discussion.	Ongoing point of discussion
FBC.LUR.11	CEA assessment methodology	The list of projects screened into the CEA in the EIA is appropriate.	FBC agree that the list of projects screened into the CEA is appropriate	Agreed
FBC.LUR.12	Assessment of the effects from the	Significant residual effects are predicted from the permanent loss of agricultural	FBC agree.	Agreed

Reference Number	Discussion point	Applicants' position	Fylde Borough Council position	status
	Transmission Assets alone.	land (including best and most versatile (BMV) land) and the temporary disruption to the operation of agricultural land holdings from the Transmission Assets alone.		
FBC.LUR.13	Assessment of the effects from the Transmission Assets alone.	There will be no significant effects on recreation resources for the impacts from the Transmission Assets alone.	FBC will review the Applicant's Local Tourism Assessment at Deadline 5 prior to commenting on this matter. However, they would raise that they have previously made comments regarding the nature and harm of the dunes.	Ongoing point of discussion
FBC.LUR.14	Assessment of the effects from the Transmission Assets cumulatively with other projects	Significant residual effects are predicted from the permanent loss of agricultural land (including BMV land) from the Transmission Assets when considered cumulatively with other projects.	This is agreed.	Agreed
		There will be no other significant residual effects on land use and recreation receptors.	Fylde Borough Council and the Applicants are still pro-actively engaging on this item.	Ongoing point of discussion
FBC.LUR.15	Mitigation and monitoring	The mitigation measures and monitoring outlined in Volume 3, Chapter 6: Land Use and Recreation (APP-104), the Commitments Register (AS-030), the Outline Public Rights of Way (PRoW) Management Plan (APP-198) and the Outline Soil Management Plan (APP-200) are appropriate and will ensure significant effects are avoided.	FBC has comments relating to the assessment conclusions and therefore, cannot agree that the mitigation measures will ensure that significant effects will be avoided.	Ongoing point of discussion
<b>Other Document and Plans</b>				

Reference Number	Discussion point	Applicants' position	Fylde Borough Council position	status
FBC.LUR.16	Outline Management Plans	The measures set out in the Outline PRoW Management Plan (APP-198) and the Outline Soil Management Plan (APP-200) are secured in the draft DCO (AS-004) and are appropriate with regard to proposed mitigation measures and monitoring.	FBC welcome the Applicants' clarifications to the management plans, however they consider that further detail is required in the Soil Management Plan with regards to peat in particular as the hierarchy approach if peat deposits cannot be avoided.	Ongoing point of discussion

## 1.4.7 Noise and Vibration

**Table 1.10: Agreement log between the parties on Noise and Vibration**

Reference Number	Discussion point	Applicants' position	Fylde Borough Council position	Status
FBC.NV.1	Consultation	The Applicants have undertaken adequate consultation with FBC on the potential impacts of the Transmission Assets on noise and vibration.	Whilst FBC have raised concerns regarding the overall adequacy of consultation undertaken by the Transmission Assets project (AoC-008) FBC confirm that the consultation for noise and vibration has been adequate.	Agreed
FBC.NV.2	Consultation	The Application documents have had due regard to matters raised by FBC through statutory and non-statutory consultation on noise and vibration.  The Applicants provided a response to Fylde Borough Council's additional submission (appended to the SoCG)	Matters outstanding regarding questions asked – FBC seeking clarification through SoCG process.  The Applicants' response to the points raised in FBC's additional submission has provided clarification to the outstanding questions and has now been agreed.	Agreed
FBC.NV.3	Policy and planning	The Application has identified and considered the most up-to-date plans and policies as relevant to noise and vibration, within FBC's remit.	Notwithstanding that it has made some comments regarding guidance and data, FBC confirms that the Applicants have identified the relevant adopted plans and policies within their assessment.	Agreed
FBC.NV4	Surveys	The site-specific surveys for noise and vibration have been undertaken in accordance with agreed methodologies	FBC agree the baseline noise surveys were undertaken in line with relevant methodologies and represent a reasonable representation of the baseline in the area.	Agreed



Reference Number	Discussion point	Applicants' position	Fylde Borough Council position	Status
FBC.NV.5	Surveys	Sufficient primary and secondary data (including site-specific surveys) has been collated to appropriately characterise the noise and vibration baseline environment for the purposes of Environmental Impact Assessment (EIA) within Volume 3, Chapter 8: Noise and Vibration (APP-117).	Notwithstanding that it has made some comments regarding guidance and data, FBC confirms that the Applicants have identified the relevant adopted plans and policies within their assessment.	Agreed
FBC.NV.6	Baseline environment	The baseline environment for noise and vibration is appropriately characterised in Volume 3, Chapter 8: Noise and Vibration (APP-117).	FBC agree the baseline survey results were correctly analysed to derive representative baseline noise levels.	Agreed
FBC.NV.7	Study area	The noise and vibration study area is appropriate for the impacts and the receptors assessed.	FBC confirms that the geographical extent of the noise and vibration study area is appropriate.	Agreed
FBC.NV.8	Assessment methodology	<p>The sensitivity and significance of the noise and vibration receptors has been appropriately and adequately described within Volume 3, Chapter 8: Noise and Vibration (APP-117).</p> <p>The Applicants provided a response to Fylde Borough Council's additional submission (appended to the SoCG)</p>	<p>FBC agree that the general noise assessment methodology and receptor sensitivities are in line with relevant standards.</p> <p>Potential disagreement on assessment outcome and resulting significance of effects (see below).</p> <p>The Applicants' response to the points raised in FBC's additional submission has provided clarification to the outstanding questions and has now been agreed.</p>	Agreed
FBC.NV.10	Assessment methodology –	The methodologies used in within Volume 3, Chapter 8: Noise and Vibration (APP-117) are appropriate for assessing the	FBC consider that general approach is broadly in line with relevant standards but have some residual concerns	Agreed

Reference Number	Discussion point	Applicants' position	Fylde Borough Council position	Status
	construction noise	potential impacts of the Transmission Assets in respect of construction noise. The Applicants provided a response to Fylde Borough Council's additional submission (appended to the SoCG)	regarding some of the assumptions and the specific assessment of construction noise effects.  The Applicants' response to the points raised in FBC's additional submission has provided clarification to the outstanding questions and now been agreed.	
FBC.NV.11	Assessment methodology – operational noise	The methodologies used in within Volume 3, Chapter 8: Noise and Vibration (APP-117) are appropriate for assessing the potential impacts of the Transmission Assets in respect of operational noise.	FBC have no significant concerns regarding the methodology and assessment of operational noise.	Agreed
FBC.NV.12	Assessment methodology – construction vibration	The methodologies used in within Volume 3, Chapter 8: Noise and Vibration (APP-117) are appropriate for assessing the potential impacts of Transmission Assets in respect of construction vibration.	FBC agree that no significant construction vibration effects would be expected.	Agreed
FBC.NV.14	Project design envelope	The appropriate Maximum Design Scenario has been used in the Volume 3, Annex 8.2: Construction Noise and Vibration technical report (APP-119).  The Applicants provided a response to Fylde Borough Council's additional submission (appended to the SoCG) including clarifications on the assumptions used in the assessment.	FBC require further clarifications regarding the maximum design scenario to be used for assessment – have requested additional information (and points of disagreement) via SoCG process and examination library (AoC-008). <ul style="list-style-type: none"> <li>• Concurrent v sequential</li> <li>• Cable pulling</li> <li>• Trenchless techniques (nursing home / beach work / sand</li> </ul>	Agreed

Reference Number	Discussion point	Applicants' position	Fylde Borough Council position	Status
			<p>dunes / golf course / playing fields)</p> <ul style="list-style-type: none"> <li>Construction compounds (Wrea Green)</li> </ul> <p>The Applicants' response to the points raised in FBC's additional submission has provided clarification to the outstanding questions and now been agreed.</p>	
FBC.NV.15	Assessment of the effects from the project alone – construction noise and vibration	<p>With the exception of the veterinary practice, there will be no significant residual effects on noise and vibration sensitive receptors from the development of the Transmission Assets.</p> <p>The Applicants provided a response to Fylde Borough Council's additional submission (appended to the SoCG)</p>	FBC agree with the assessment undertaken.	Agreed
			FBC disagree with the working hours which have been utilised for the purpose of the assessment.	Not agreed
FBC.NV.16	Assessment of the effects from the project alone-operational noise	<p>There will be no significant residual effects on noise sensitive receptors from the operation of the Transmission Assets.</p> <p>The Applicants have committed to providing an operational noise limit on the face of the DCO secured by Requirement (18).</p>	FBC agree that the proposed Requirement (18) (with inclusion of noise limit on the face of the DCO) represents a reasonable control of operational noise from the proposed substations.	Agreed
FBC.NV.17	Assessment of the effects from the project cumulatively with other projects	<p>There will be no significant residual effects on noise and vibration sensitive receptors from the development of the Transmission Assets when considered cumulatively with other projects.</p> <p>The Applicants confirm that the solar farm application has been considered in the</p>	FBC agree with the cumulative assessment that has been undertaken	Agreed
			FBC disagree with the working hours utilised for the cumulative assessment.	Not agreed

Reference Number	Discussion point	Applicants' position	Fylde Borough Council position	Status
		update to the Cumulative Effects Assessment at Deadline 5 (document reference F1.5.5/F03) and that no update to the noise assessment is required.		
<b>Other Documents and Plans</b>				
FBC.NV.18	Outline Construction Noise and Vibration Management Plan (APP-215)	<p>The Outline Code of Construction Practice (APP-193) and the accompanying Outline Construction Noise and Vibration Management Plan (APP-196) are secured through the dDCO (REP3-009) and are appropriate with regard to proposed mitigation and monitoring measures.</p> <p>The Applicants updated the Outline Construction Noise and Vibration Management Plan at Deadline 5 following discussions with FBC,</p>	It is agreed.	Agreed

## 1.4.8 Air Quality

**Table 1.11: Agreement log between the parties on Air Quality**

Reference Number	Discussion point	Applicants' position	Fylde Borough Council position	Status
<b>EIA</b>				
FBC.AQ.1	Consultation	The Applicants have undertaken adequate consultation with FBC on the potential impacts of the Transmission Assets on air quality.	Whilst FBC have raised concerns regarding the overall adequacy of consultation undertaken by the Transmission Assets project (AoC-008) FBC confirm that the consultation for air quality has been adequate.	Agreed
FBC.AQ.2	Consultation	The Application documents have had due regard to matters raised by FBC through statutory and non-statutory consultation on air quality/ dust management (refer to Table 9.5 of Volume 3, Chapter 9: Air quality (APP-121)).	FBC agree that the Applicants have had due regard to matters raised by FBC in relation to air quality.	Agreed
FBC.AQ.3	Policy and planning	The Application documents have identified and considered the most up-to-date plans and policies as relevant to air quality within FBC's remit	FBC confirms that the Applicants have identified the relevant adopted plans and policies within their assessment	Agreed
FBC.AQ.4	Surveys	Agreement that desk -based information is adequate to characterise the air quality baseline and that site-specific surveys are not required	FBC confirm that the desk-based information is adequate to characterise the air quality baseline and that soil surveys are not required.	Agreed
FBC.AQ.5	Baseline environment	The air quality baseline has been appropriately characterised in Volume 3, Chapter 9: Air quality (APP-121) and uses data collected for a five-year period between 2019 and 2023 (refer to Applicants'	FBC agree that the baseline considers the appropriate scope and duration of meteorological data and that it aligns with standard industry practice.	Agreed

Reference Number	Discussion point	Applicants' position	Fylde Borough Council position	Status
		Response to Examining Authority's Written Questions (ExQ1) Q3.1.3 of REP3-056).  One year of meteorological data is considered sufficient because it aligns with standard industry practice for dispersion modelling, for road traffic emissions (refer to Applicants' Response to ExQ1, Q3.1.4 of REP3-056).		
FBC.AQ.6	Study area	The air quality study area is appropriate for the impacts and the receptors assessed.	FBC confirms that the geographical extent of the air quality study area is appropriate	Agreed
FBC.AQ.7	Assessment methodology	The sensitivity and significance of the air quality receptors have been appropriately and adequately described within Volume 3, Chapter 9: Air quality (APP-121).	FBC agree that the sensitivity and significance of the air quality receptors have been appropriately described.	Agreed
FBC.AQ.8	Assessment of the effects from the project alone	The potential impacts identified within Volume 3, Chapter 9: Air quality (APP-121) represent a comprehensive list of the potential impacts in relation to air quality	FBC agree that list of potential impacts considered in the assessment is appropriate.	Agreed
FBC.AQ.9	Assessment of the effects from the project alone	There will be no significant residual effects on air quality receptors from the development of the Transmission Assets	FBC agree with the conclusions of the air quality assessment that no significant residual effects will occur from the Transmission Assets.	Agreed
FB0C.AQ.10	Assessment of the effects from the project cumulatively with other projects	There will be no significant residual effects on air quality receptors from the development of the Transmission Assets when considered cumulatively with other projects	FBC agree that no significant residual effects will occur from the Transmission Assets when considered cumulatively with other projects.	Agreed
FBC.AQ.11	Mitigation	The mitigation measures outlined in Volume 3, Chapter 9: Air quality (APP-121) are appropriate and will ensure significant effects are avoided	FBC agree that the mitigation measures are appropriate providing that the following text is added	Agreed

Reference Number	Discussion point	Applicants' position	Fylde Borough Council position	Status
			<p><i>Haul routes to be regularly damped down with fixed or mobile sprinkler systems or mobile water bowzers and regularly cleaned</i></p> <p><i>Ensure vehicles entering and leaving sites are covered to prevent escape of materials during transport</i></p> <p>Section 1.6.10 of the dust management plan at D6.</p>	
FBC.AQ.12	Outline management plans	<p>The Outline Code of Construction Practice (APP-193) and the accompanying Outline Dust Management Plan (APP-195) are secured through the dDCO (AS-04) and are appropriate with regard to proposed mitigation and monitoring measures.</p> <p>The detailed Dust Management Plan(s) will need to be agreed with FBC and will include details of specific and appropriate reactive control measures to be implemented in response to complaints, either made directly to the appointed contractor or by way of the Environmental Protection Department of FBC (refer to Applicants' Response to ExQ1, Q3.1.1 of REP3-056).</p>	<p>FBC agree that the mitigation measures are appropriate providing that the following text is added</p> <p><i>Haul routes to be regularly damped down with fixed or mobile sprinkler systems or mobile water bowzers and regularly cleaned</i></p> <p><i>Ensure vehicles entering and leaving sites are covered to prevent escape of materials during transport</i></p> <p>Section 1.6.10 of the dust management plan at D6.</p>	Agreed

## 1.4.9 Socio-Economics

**Table 1.12: Agreement Log between the parties on Socio-economics**

Reference Number	Discussion point	Applicants' position	Fylde Borough Council position	Status
FBC.SE.1	Consultation	The Applicants have undertaken adequate consultation with FBC on the potential impacts of the Transmission Assets on socio-economics	Whilst FBC have raised concerns regarding the overall adequacy of consultation undertaken by the Transmission Assets project (AoC-008) FBC agree confirm that the consultation for socio-economics has been adequate. Source: SoCG meeting 08/09/2025	Agreed
FBC.SE.2	Consultation	The Application documents have had due regard to matters raised by FBC through statutory and non-statutory consultation on socio-economics.	FBC has raised a number of concerns in its submissions, relating to socio-economics. Some of these concerns remain under discussion.	Ongoing point of discussion
FBC.SE.3	Policy and planning	The Application documents have identified and considered the most up-to-date plans and policies as relevant to socio-economics within FBC's remit	Notwithstanding that it has made some comments regarding guidance and data, FBC confirms that the Applicants have identified the relevant adopted plans and policies within their assessment. Source: SoCG meeting 08/09/2025	Agreed
FBC.SE.4a	Baseline environment	The tourism baseline has been appropriately characterised in Volume 4, Chapter 2: Socio-economics (APP-141).	FBC has raised comments regarding the socio-economic baseline. This includes consideration of impacts on local tourism. FBC appreciate the progress being made by the Applicants but the characterisation of the baseline is still open for discussion.	Ongoing point of discussion
FBC.SE.4b	Baseline environment	The socio-economic baseline has been appropriately characterised in Volume 4, Chapter 2: Socio-economics (APP-141)	FBC consider that the characterisation of socio-economic baseline is appropriate.	Agreed



Reference Number	Discussion point	Applicants' position	Fylde Borough Council position	Status
FBC.SE.5	Study area	The socio-economic study area is appropriate for the impacts and the receptors assessed	FBC has raised comments on the socio-economic study area, specifically that the study area should be zoomed into reflect that South Ribble Borough Council operates differently from FBC. This is still an ongoing point of discussion.	Ongoing point of discussion
FBC.SE.6	Assessment methodology	The sensitivity and significance of the socio-economics receptors have been appropriately and adequately described within Volume 4, Chapter 2: Socio-economics (APP-141).	FBC expect to see a change in the methodology to reflect the change in the study area. This is still an ongoing point of discussion.	Ongoing point of discussion
FBC.SE.7	Assessment of the effects from the project alone	There will be no significant residual effects on socio-economic receptors from the development of the Transmission Assets	This is an ongoing point of discussion	Ongoing point of discussion
FB0C.SE.8	Assessment of the effects from the project cumulatively with other projects	There will be no significant residual effects on socio-economic receptors from the development of the Transmission Assets when considered cumulatively with other projects	This is an ongoing point of discussion	Ongoing point of discussion
FBC.SE.9	Mitigation	The mitigation measures outlined in Volume 4, Chapter 2: Socio-economics (APP-141) are appropriate and will ensure significant effects are avoided	FBC consider that the mitigation measures within the chapter are unclear and consider that further mitigation measures are required	Ongoing point of discussion
<b>Other Documents and Plans</b>				
FBC.SE.10	Outline management plans	The Outline Employment and Skills Plan (APP-239) are secured through the dDCO (AS-004) and are appropriate with regard to proposed mitigation and monitoring measures.	FBC welcome the progress made by the Applicants on the Outline Employment and Skills Plan. This remains an ongoing point of discussion..	Agreed

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### 1.4.10 Climate Change

Fylde Borough Council have commented on aspects of Climate Change in connection with other topics such as Air Quality and Ecology. In general, FBC are supportive of renewable energy and have no further comments in regards to Climate Change and therefore have mutually agreed with the Applicants that the table can be removed.

### 1.4.11 DCO

**Table 1.13: Agreement log between the parties on the DCO**

Reference Number	Discussion point	Applicants' position	Fylde Borough Council position	Status
FBC.DCO.1	Specific requirements for discussion to be confirmed	Ongoing point of discussion	Ongoing point of discussion	Ongoing point of discussion