



MORGAN AND MORECAMBE OFFSHORE WIND FARMS: TRANSMISSION ASSETS

Applicants' Response to Public Deadline 5 submissions and other Post Hearing Submissions

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Contents

1	APPLICANTS' RESPONSE TO IPS' SUBMISSIONS AT DEADLINE 5	1
1.1	Introduction	1
2	APPLICANTS' RESPONSE TO IPS' SUBMISSIONS AT DEADLINE 5	2
2.1	Alan Childs	2
2.2	Christine Abbott	5
2.3	Gillian Fielding	9
2.4	Lynda Goupil	12
2.5	Michael Dziubinki	18
2.6	Samantha Rimmer	19

Tables

Table 2-1: REP5-193 – Alan Childs	2
Table 2-2: REP5-194 – Christine Abbott	5
Table 2-3: REP5-195 – Gillian Fielding	9
Table 2-4: REP5-197 – Lynda Goupil	12
Table 2-5: REP5-200 – Michael Dziubinki	18
Table 2-6: REP5-201 – Samantha Rimmer	19

Glossary

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

Term	Meaning
Environmental Statement	The document presenting the results of the Environmental Impact Assessment process.
Evidence Plan Process	A voluntary consultation process with specialist stakeholders to agree the approach to, and information to support, the EIA and Habitats Regulations Assessment processes for certain topics.
Generation Assets	The generation assets associated with the Morgan Offshore Wind Project and the Morecambe Offshore Windfarm include the offshore wind turbines, inter-array cables, offshore substation platforms and platform link (interconnector) cables to connect offshore substations.
Intertidal area	The area between Mean High Water Springs and Mean Low Water Springs.
Intertidal Infrastructure Area	The temporary and permanent areas between MLWS and MHWS.
Landfall	The area in which the offshore export cables make landfall (come on shore) and the transitional area between the offshore cabling and the onshore cabling. This term applies to the entire landfall area at Lytham St. Annes between Mean Low Water Springs and the transition joint bay inclusive of all construction works, including the offshore and onshore cable routes, intertidal working area and landfall compound(s).
Local Authority	A body empowered by law to exercise various statutory functions for a particular area of the United Kingdom. This includes County Councils, District Councils and County Borough Councils.
Local Highway Authority	A body responsible for the public highways in a particular area of England and Wales, as defined in the Highways Act 1980.
Main rivers	The term used to describe a watercourse designated as a Main River under the Water Resources Act 1991 and shown on the Main River Map. These are usually larger rivers or streams and are managed by the Environment Agency.
Marine licence	The Marine and Coastal Access Act 2009 requires a marine licence to be obtained for licensable marine activities. Section 149A of the Planning Act 2008 allows an applicant for to apply for 'deemed marine licences' in English waters as part of the development consent process
Maximum design scenario	The realistic worst case scenario, selected on a topic-specific and impact specific basis, from a range of potential parameters for the Transmission Assets.
Mean High Water Springs	The height of mean high water during spring tides in a year.
Mean Low Water Springs	The height of mean low water during spring tides in a year.
Micro-tunnel / micro-tunnelling	A tunnelling technique involving the use of a hydraulic (or other) jacking rig and a mini (or micro) tunnel boring machine to install a concrete tunnel between two points.
Mitigation measures	This term is used interchangeably with Commitments. The purpose of such measures is to avoid, prevent, reduce or, if possible, offset significant adverse environmental effects.
Morecambe Offshore Windfarm: Generation Assets	The offshore generation assets and associated activities for the Morecambe Offshore Windfarm.

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

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

Acronyms

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

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

Units

Unit	Description
%	Percentage
dB	Decibels
Kg	Kilogram

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

1 Applicants' Response to IPs' Submissions at Deadline 5

1.1 Introduction

- 1.1.1.1 Following Deadline 5, Morgan Offshore Wind Limited ('Morgan OWL') and Morecambe Offshore Windfarm Limited ('Morecambe OWL'), (together, 'the Applicants') have taken the opportunity to review each of the submissions from Interested Parties. This includes Written Representation, post-hearing submissions as well as responses to ExQ1.
- 1.1.1.2 Details of the Applicants' response to each of the submissions from Interested Parties are set out in this document.
- 1.1.1.3 The Applicants have numbered the submissions in line with the Planning Inspectorate's document library, with subsequent paragraph number, e.g. REP5-001.1, REP5-001.2, etc.

2 Applicants' Response to IPs' submissions at Deadline 5

2.1 Alan Childs

Table 2-1: REP5-193 – Alan Childs

Reference	IP submission	Applicants' response
REP5-193.1	<p>I observed the hearings held at AFC Fylde last week and was impressed by the attention to detail (e.g. the expansive list of action points from each day) and by the representations made by individuals and organisations. After further reflection, I felt I must share with you my own observations.</p> <p>Clearly the DCO application is a highly complex matter and the bulging content of the Examination Library is testament to this. The applicants, in their responses to representations and to questions from the Examination team, seem totally convinced of the viability of their project and supremely confident that any concerns or issues raised are either invalid or can be addressed easily.</p>	<p>The Applicants welcome Mr Childs' attendance at the Fylde FC hearings and note the feedback received regarding attention to detail and informative representations.</p>
REP5-193.2	<p>I am not sure that it was fully appreciated that those who oppose the project or have well-founded concerns about certain aspects of the project, find the constraints that surrounded the specificity of the DCO application frustrating because it is the finer detail associated with the subsequent design phase which can have such profound impacts on individuals, communities and the environment. When matters were raised which fell into the impacts which the design phase might produce, these perfectly understandable comments were dismissed as an irrelevance and not within the remit of the hearing or indeed germane to the DCO application. I felt some unease that genuine concerns were dismissed on procedural grounds: a classic strategy in many</p>	<p>The Applicants note these comments and can assure Mr Childs that the Applicants take all matters raised during examination seriously and consider any representations made with the due respect that all stakeholders deserve.</p>

	legal undertakings and patronising ("you are out of your depth and don't know how these things work").	
REP5-193.3	I apologise if I have failed to read the appropriate documents which explain the rationale behind the chosen route of the cabling, but as one of my customers remarked, the route looks like it has followed the path taken by an out of control Springer Spaniel as it scythes through productive farmland, crosses major roads, sweeps close to residential properties, rips up recreational facilities and imperils those who use rural roads.	<p>The Applicants have undertaken a rigorous and robust route planning and site selection process in relation to the onshore infrastructure for the Transmission Assets.</p> <p>The optimum route in terms of minimising impacts, costs and ensuring feasible delivery for an onshore grid connection is generally considered to be the shortest route from A to B from landfall to the National Grid Penwortham substation with consideration of a range of constraints which are then considered when 'micro-siting' the cable. The final route presented is considered to effectively achieve this, within the environmental, technical and social constraints that have been identified along the proposed onshore export cable corridor route.</p>
REP5-193.4	I am unclear as to how the DCO application examination will address the issue of the two projects. Could a recommendation to the Secretary of State approve one and dismiss the other? Could a recommendation include a requirement that work commences concurrently on both projects? Could a recommendation accept that the projects could be undertaken sequentially?	<p>The draft DCO (REP5a-018) ensures that each project can deliver its infrastructure independently of the other as each project has its own separate (but identical) schedules detailing requirements, deemed marine licences, compulsory acquisition, etc. This drafting ensures that the DCO can be read as applying to just one project where appropriate (for example, if the Secretary of State only grants consent to one project, or where the relevant Generation Assets are not granted consent). The Applicants confirm that this drafting generally follows the approach taken in other joint DCOs, including Sheringham Shoal and Dudgeon Extensions, Dogger Bank Teesside A and B and Dogger Bank Creyke Beck A and B.</p> <p>This is done through the use of definitions such as "undertaker", which is separated out to apply to Project A and Project B separately. Each project is subject to separate sets of requirements (Schedules 2A and 2B) and their own work numbers (see Chapters 1 and 2 of Schedule 1). Additionally, the drafting of the DCO ensures that each undertaker only has the power to compulsorily acquire land and rights necessary for its set of transmission assets – so Morgan OWL in respect of Project A and Morecambe OWL in respect of Project B. This is further explained in section 1.6.6 of the Explanatory Memorandum (REP5-012). Again, Article 29 (which authorises temporary possession of land for construction purposes) is drafted to make clear that Morgan OWL and Morecambe OWL can only use those powers to construct their own transmission assets – Project A for Morgan OWL and Project B for Morecambe OWL. Most schedules are split between Project A and Project B to ensure it is clear what is authorised in relation to each project. This includes separate deemed marine licences for offshore works and licensed activities concerning the crossing of the River Ribble.</p> <p>There is a need for the projects to be able to be constructed concurrently or sequentially which the Applicants have set out in Section 8 of document Annex 5.2 to</p>

		<p>the Applicants' response to Hearing Action Points: ISH1 6, 8, 9, 19, 26 & 28 - Rev F01 (REP3-041). The Applicants set this out further in response to the ExA's First Questions Q1.1.4 and Q1.1.10 (REP3-057). The Applicants set out in section 8.2 of REP3-041 why it would not be appropriate or possible to impose provisions on the Applicants requiring the Applicants to commit to concurrent or joint construction. This was also set out in response to the Examining Authority's questions on the draft DCO. The Applicants provided further reassurance around how the construction scenarios would work in practice in their response to Examining Authority question Q2:1.1.2 (REP5-130).</p> <p>In delivering the Transmission Assets, greater certainty can be given at the post consent stage at which time relevant planning authorities and others will be involved in approval of stages of the construction of the Transmission Assets. The Applicants are committed to reducing impacts wherever possible and have now proposed to establish a Construction Coordination Working Group post-consent, which would involve specific engagement with the local planning authorities, to facilitate the exploration of opportunities and measures for coordination where possible and practicable between the projects in order to minimise impacts. The Applicants provided further detail on the approach to co-ordination and collaboration in their response to Examining Authority question Q2:1.1.1 (REP5-130).</p>
REP5-193.5	<p>Finally, I am increasingly cautious about the glibness associated with the discussion about environmental mitigation. The fact that more productive farmland will be taken to provide areas of mitigation is somewhat ironic, but more important is that effective mitigation takes years to impact whereas construction works have an immediate and deleterious impact.</p>	<p>The Applicants note Mr Childs' representation and have sought to be helpful and respectful at all times during the examination process.</p> <p>The Applicants are committed to developing the Transmission Assets in a way that is sensitive to the environment, avoiding or minimising potential effects wherever possible, and have engaged with key environmental stakeholders throughout the application process to ensure appropriate mitigation measures can be implemented.</p> <p>Impacts which have the potential to give rise to likely significant effects have been carefully assessed and appropriate mitigation identified throughout the Environmental Statement. Those measures are secured through the Requirements set out in Schedules 2A and 2B of the draft DCO (REP5a-018). Mitigations are also set out in the updated Commitments Register (REP5-027) submitted at Deadline 4. Further detail on the site selection for the mitigation and biodiversity benefit areas was submitted at Deadline 2 (REP2-046).</p> <p>The Applicants remain committed to engaging with stakeholders to understand areas of concern, considering potential mitigation measures, and keeping the community informed as the project progresses.</p>

REP5-193.6	My objection to the Morgan and Morecambe Wind Farms is not about the development of alternative energy, but the route of the transmission assets seems, on balance, to undermine the fundamental principle of seeking sustainable electrical power (green energy) when the impact on the environment and the people who live and work in it is so palpably traumatic and, in essence, a destructive force rather than a force for good.	The Applicants note this response and have responded to the comments raised above, and they welcome ongoing discussion with all stakeholders going forward.
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2.2 Christine Abbott

Table 2-2: REP5-194 – Christine Abbott

Reference	IP submission	Applicants' response
REP5-194.1	<p>DEADLINE 3/4 - Response to Landscape Matters relating to the Inspector's request for Comments on Landscape Technical Note (07 July 2025) and General Submission.</p> <p>Ref (1.2.6.5) the Applicant claims the substations placement minimizes landscape and visual impacts. However, the choice of Greenbelt location next to an Area of Separation significantly contradicts this statement. The development would permanently degrade open green space distant views and impact surrounding areas. I do not believe mitigation can sufficiently preserve the Landscape Character. The Landscape Character here has grown from culture, history, and a lack of human intervention which has fostered a rich and varied ecosystem. This cannot be 'reinstated' in a matter of days.</p>	<p>The Applicants recognise the concerns raised and appreciate the importance of protecting the environment; they would therefore emphasise that the presence of green belt land was given due consideration throughout the site selection process. The Applicants are committed to developing the Transmission Assets in a way that is sensitive to the environment, avoiding or minimising potential effects wherever possible.</p> <p>The Applicants submitted a Green Belt Technical Note (REP3-069) at Deadline 3 (which was subsequently updated at Deadline 4 (REP4-092), which clearly demonstrates (with the help of an additional onshore constraints map) that there were no suitable alternative sites outside the Green Belt in which the substations could reasonably have been accommodated without resulting in significant environmental impacts. The Applicants have committed to implementation of numerous mitigation measures to minimise the impacts on the green belt land and surrounding environment.</p>
REP5-194.2	<p>Layout Examples: Hornsea Converter Station:</p> <p>Google maps suggest the landscape here is completely flat which would shield the Station from view. The landscape is much larger and is in close proximity to other infrastructure e.g. a power station and oil refinery. This is in contrast to the</p>	<p>The Applicants wish to clarify that the intention of the images presented in the <i>Technical Note: Landscape and Design Matters</i> (REP3-064) was not to provide an assessment of landscape setting or context. Rather, as stated at paragraphs 1.2.9.1 and 1.2.9.3 of the documents [emphasis added by the Applicants]:</p>

	<p>Applicants proposed substations which would be in small scale open fields on the top of hills. Adjacent Areas of Separation Land and a scattering of farms and rural residencies surround it.</p> <p>Rayleigh and Imatra Substations:</p> <p>The two substations described as examples are in completely different landscape settings than the proposed substations. Rayleigh substation appears to be set in an urban development area and Imatra substation appears to be in a dense wooded area providing screening all year round and allowing the land to be used more flexibly. Again, they are not like for like examples of the Applicants proposed location, a site which is much loved by residents for it's cultural and historic landscape and picturesque views</p>	<p><i>“This section presents a series of precedent images that illustrate some best practice design approaches for onshore substations associated with electrical infrastructure...”</i></p> <p>and</p> <p><i>“The images provide examples of the application of good design and the opportunity for and benefits of establishing design principles and coding to govern good design outcomes set out in National Policy Statements EN-1, EN-3 and EN-5.”</i></p> <p>The Applicants acknowledge that the context of each precedent image differs from the locality of the Transmission Assets. However, as the document makes clear, its purpose was not to share schemes that were like the receiving landscape of the Transmission Assets, but rather to provide illustrative examples of the potential form and appearance of substation development and how design principles might be applied, in support of stakeholders understanding of operational electrical infrastructure.</p>
REP5-194.3	<p>Topographic Context</p> <p>The Morecambe substation has a proposed siting on the higher area of the land. This would make it a dominant feature of the landscape and would be clearly visible all year round to residents and PRow users on the historic footpath. The Morgan substation is also proposed on a higher area of the land. It would be very difficult to provide screening with vegetation as the land falls sharply to the east. Two levels are noted for the Morgan substation, however, no scale or orientation details are provided and the cross-sections give no useful information as to whether the structure would possibly be any less of an eyesore that it appears to be.</p>	<p>The Applicants appreciate the concern around the potential landscape and visual impacts and have given this due consideration throughout the assessment and application process.</p> <p>As set out in previous submissions by the Applicants, Volume 3, Chapter 10: Landscape and Visual Resources (APP-123) provided a robust assessment of potential impacts, and this assessment has been undertaken in accordance with recognised best practice and industry-standard guidance, specifically the Guidelines for Landscape and Visual Impact Assessment, Third Edition (GLVIA3). The Applicants therefore maintain that Volume 3, Chapter 10: Landscape and Visual Resources (APP-123) provides a proportionate and robust assessment of likely significant effects, supported by representative viewpoints and visualisations, which were agreed with the relevant planning authorities and statutory consultees prior to the Examination of the Transmission Assets.</p> <p>The Applicants had not previously shared rendered images of the proposed substations prior to the appointment of the technical design partner, as this could have been misleading and misrepresentative of the final design. The technical design partner will be responsible post-consent for refining layouts, informing design development and ensuring alignment with the approved outline design secured in the DCO, which will be progressed in collaboration with the local planning authority (who will be responsible for the discharge of relevant requirements).</p> <p>The Applicants highlight that 18 visualisations were submitted, as part of the DCO Application in September 2024, in support of Volume 3 Chapter 10 Landscape and</p>

		<p>visual resources (APP-123) in Volume 3, Figures - Part 6 of 7 (APP-136). The submission visualisations have been prepared in accordance with best practices and guidance, representing the Maximum Design Scenario. The Applicants reaffirm that their purpose is to illustrate the likely scale and proportions of the Transmission Assets at both Year 1 and Year 15, in summer and winter conditions, in support of the LVIA, providing an established and widely accepted technique for understanding changes in views and visual amenity.</p> <p>The Applicants acknowledge, for complete transparency, that the original visualisations were resubmitted at Deadline 3 (see REP3-015), in which the Applicants corrected some labelling and presentation of photomontages. No changes were made to the visual representation of each substation's parameters or indicative 3D models depicted in each view.</p> <p>Finally, the Applicants acknowledge that visualisations have inherent limitations, as recognised in the Landscape Institute's Technical Guidance Note 06/19: Visual Representation of Development Proposals (2019). Photographs and graphics are illustrative tools that do not fully replicate human perception and must be interpreted alongside fieldwork observations, which inform the LVIA's conclusions. These limitations are set out in Section A.1.5 of Volume 3, Annex 10.4: LVIA Methodology (APP-127), in accordance with best practices.</p> <p>The Applicants note the comment regarding the level of detail currently provided on cut and fill operations associated with the substations. In accordance with standard practices for offshore wind projects and their associated onshore transmission infrastructure, the final substation layouts and finished ground levels will be determined at the detailed design stage, informed by technical and engineering requirements. Cut and fill operations will be required to establish suitable level platforms and will be designed to minimise spoil movement, as set out in the Project Description (REP5-024), the outline Design Principles (REP5-064), and other relevant management plans. The detailed design, including final levels, will be subject to approval by the relevant planning authority under Requirement 4 of the draft DCO (REP5a-018), as part of the post-consent design process described in Section 6.0 of the outline Design Principles (REP5-064).</p>
REP5-194.4	Furthermore, attempts at mitigation planting will be challenging considering the entry/exit routes of cables. Soil depth above the trench will likely not be deep enough to provide enough root space for tree planting and therefore compromise the trees growth and stability.	<p>The Applicants recognise Ms Abbott's concerns regarding the potential for landscape, visual, noise, and vibration impacts from the Project and refers her to the response above (REP5-194 194.3) regarding potential landscape and visual impacts and visualisations.</p>

	<p>Ref 1.2.5.2 notes that levels and profiles are finalized in Detailed Design. I believe fundamental plans should be set earlier due to the project's scale and greenbelt location. Because it is NSIP, is it not even more important to provide these details early on? Delaying details hinders "Good Design", sustainable solutions and transparency for the general public. Once the Detailed Design is provided, it is too late in the examination stage to challenge these Plans. I strongly believe this is unfairly allowing NSIP's to be inappropriate, foreboding structures in completely unsuitable areas, e.g. greenbelt, ancient woodland, such as the proposed Plan.</p> <p>The Application lacks the evidence needed to assess its full impact. Without accurate visualisations how do we assess the Plans full impact? How do we know the full extent of how noise and vibration will affect the areas tranquility?</p>	<p>The Applicants have not proposed tree planting directly over the route of the onshore export cable corridor. As noted, the necessary soil depth above the trench is not sufficient to remove the risk of tree roots interfering with the onshore export cable. Section 1.4.3 of the oLMP (document reference J2/F05) states: "<i>The industry guidance advises that only hedge plants may be planted over the cables and that within 6 m of the cable only shallow rooted, native species such as Blackthorn (<i>Prunus spinosa</i>), Hazel (<i>Corylus avellana</i>), Broom (<i>Cytisus scoparius</i>), Elder (<i>Sambucus nigra</i>), and Hawthorn (<i>Crataegus monogyna</i>) may be planted. By planting these species, it may be possible to create a mature hedge up to 5 m wide and 5 m tall.</i>"</p> <p>The Applicants have committed to specific levels that the onshore substation maximum parameters will be set at, as secured by Requirement 4 of the draft DCO (REP5a-018). This aligns with the maximum parameters assessed in the Environmental Statement, and the production of the visualisations of the onshore substations (REP5a-031). The Applicants note that the principle of reducing the visual impacts of the onshore substation are secured within the outline Design Principles Design Code (Table 6.2 of REP5-064)</p> <p>The Applicants acknowledge noise and vibration resulting from the Transmission Assets may lead to adverse impacts and effects, as reported in Volume 3, Chapter 8: Noise and vibration of the Environmental Statement (APP-117). However, the Applicants would like to assure Ms Abbott that they recognise the potential for such disturbance and have therefore refined a suite of mitigation measures within the outline Construction Noise and Vibration Management Plan(s) for the projects, which follow best practice and apply appropriate and recognised noise limits, to ensure that noise and vibration will be suitably controlled to minimise adverse impacts and effects on local residents and the wider community. The outline Construction Noise and Vibration Management plan is secured by Requirement 8 of the draft DCO (REP5a-018). An updated outline version of the Noise and Vibration Management Plan was submitted at Deadline 5 (REP5-055), and a subsequent update has been submitted at Deadline 6 (J1.3/F04). Operational noise from the substations will also be controlled by Requirement 18 (Control of noise during operational stage) of the draft DCO. The operational noise limits are informed by the operational noise assessment reported within Volume 3, Annex 8.3: Operational Noise (APP-120). These limits, which are at the closest residential receptors to the Onshore Substations, have been set relative to the night time background noise levels, the latter which represent the quieter periods when other sound sources are absent, e.g. car movements on nearby roads. In practice, this means the Onshore Substations would not be allowed to operate if they were noisier than these specified limits.</p>
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		<p>In addition, Section 1.2.2 of APP-120 explains how the tranquillity of public spaces has also been considered, in the assessment, focussing on the Public Right of Way (PRoW) to the west of the Morgan onshore substation. This assessment, which has applied natural tranquillity impact magnitude criteria, concluded that operational noise from the substation would have negligible impact on the use of this PRoW (Table 8.35 of APP-117).</p> <p>The Applicants consider that the operational noise limits secured by Requirement 18 of the draft DCO are appropriate to minimise impacts on tranquillity.</p>
REP5-194.5	<p>General Submission</p> <p>The residents who are directly affected by the proposed Plan are generally not interested in compensation. They want the right to have a peaceful home life in their retirement. They want the right to bring up their children in clean air, free of drilling noise and vibration, heavy traffic, dust contamination and EMF radiation. They want the right to pursue their way of life as they wish to and not have their homes and businesses significantly devalued and livelihoods damaged. The anxiety, stress and upset within our community is unique for every one of us. Speak to any number of residents and they will tell you their own personal story of how this Plan will negatively impact their lives.</p> <p>I strongly urge the Ex A to halt this proposal, in order to allow the Applicant to reconsider the cable route plan.</p>	<p>The Applicants note the concerns flagged by Ms Abbott in this representation and are keen to build a positive working relationship and would like to reiterate their commitment to working with the communities into the future.</p> <p>The Applicants note Ms Abbott's request to reconsider the cable route plan, but would like to assure Ms Abbott they have undertaken a rigorous and robust route planning and site selection process in relation to the onshore infrastructure for the Transmission Assets.</p>

2.3 Gillian Fielding

Table 2-3: REP5-195 – Gillian Fielding

Reference	IP submission	Applicants' response
REP5-195.1	<p>Q2134 Moor vannin orstead wind farm</p> <p>I would like to make a comment on this project that will also affect the fylde but their approach to engage with people has been very good compared to this applicant who has just</p>	<p>The Applicants note Ms Fielding's representation regarding the approach to consultation undertaken by the Ørsted Moorir Vannin team. The Applicants have sought to be helpful and respectful at all times during the examination process and will continue to seek positive engagement with the community as this process continues.</p>

	<p>treated the residents and landowners with contempt from the beginning so why does another wind farm have a different approach and I have more faith in orstead than this project.</p>	
REP5-195.2	<p>Q2135. Gas pipe</p> <p>After watching the recording I am amazed how flippant the applicant is about the potential serious risk during construction I started out with very little confidence in this project but as time has gone on I have no confidence at all.</p>	<p>The Applicants would like to assure Ms Fielding that they take the potential interaction with existing gas pipelines seriously.</p> <p>The Applicants recognise the concern in relation to the interaction between the Transmission Assets and this existing infrastructure. Details of appropriate working arrangements in the vicinity of the pipeline have been agreed with the owner, and have been included in the draft DCO at Deadline 6. To ensure safe and appropriate construction, detailed ground investigations will be undertaken post-consent to inform the final cable route design and construction methodology (which, where there is the potential for interaction with the pipeline, will require the approval of the owner).</p>
REP5-195.3	<p>Q2416 bird strikes</p> <p>After hearing that this project could potentially cause a bird strike to BAE systems once again I can't believe how the representatives for the applicant talk about it like it's nothing it may be to them but they won't be on the other end of potentially loss of life if this was to happen.</p>	<p>The Applicants take safety very seriously and recognise the concerns in relation to aviation. The Applicants are continuing to engage with Blackpool Airport and BAE Systems in relation to this and are progressing positive discussions to ensure that appropriate mitigation is secured.</p> <p>The Applicants have previously responded on this matter further to BAE Systems Warton Aerodrome's comment within The Applicants' Response to Relevant Representations Part 1 - Introduction and thematic responses (PDA-005) (please see paragraphs 2.21.2.4 to 2.21.2.7) and provided further detail in their Deadline 1 Cover letter (REP1-001). In particular the Applicants have responded to issues around bird strike in their response to Issue Specific Hearing 1 Action Point 40, in the Applicants' response to Hearing Action Points due at Deadline 1 (REP1-037). Further detail on the site selection for the mitigation and biodiversity benefit areas was submitted at Deadline 2 (REP2-046).</p> <p>The Applicants confirmed at Issue Specific Hearing 1 that engagement with BAE is ongoing in order to agree a wildlife hazard management plan (see paragraphs 60 - 64 of The Applicants' Hearing Summary of Issue Specific Hearing 1 – Day 2 (REP1-035)). The Applicants also provided responses in relation to this matter at ISH1_40 of The Applicants' response to Hearing Action Points at Deadline 1 (REP1-037) and provided further detail in relation to engagement with both BAE and Blackpool Airport in the Deadline 1 Cover letter (REP1-001). At Deadline 2, the Applicants have submitted the Strategy for Wildlife Hazard Management Plan (REP2-047) which has been shared with BAE and Blackpool Airport as part of the Applicants' ongoing engagement with those bodies as explained in the Applicants' responses to Blackpool</p>

		<p>Airport and BAE written representations in The Applicants' Responses to Written Representations from Statutory Consultees and other organisations (REP2-031). At Deadline 3 the Applicants subsequently submitted the Outline Wildlife Hazard Management Plan (REP3-065), which was then updated at Deadline 5 (REP5-106).</p> <p>The Applicants do not consider that the Transmission Assets project will increase or alter the risk posed by bird strike to aircraft operating out of Warton Aerodrome or Blackpool Airport or that the project will create any increased risk to public safety. This is supported by BAE's response to the Examining Authority's questions (REP5-161) in which they state: <i>"it is considered unlikely that there will be an unacceptable risk to / or interference with operations at Warton Aerodrome and the Aerodrome's ability to perform its defence role (with specific regard to bird strike) provided appropriate mitigation measures can be identified and put in place"</i>.</p> <p>The Applicants have developed a Bird Strike Risk Assessment that considers potential changes to bird strike risk at Blackpool Airport. This has been agreed by Blackpool Airport as being suitable. Blackpool Airport will integrate the management of this risk into their existing management, as per the requirements of CAP 772 Wildlife hazard management at aerodromes/airports. The Applicants are working through a similar process at Warton Aerodrome and we are confident that we will reach a similar conclusion, information specifically about this can be found in the outline Wildlife Hazard Management Plan (S_D3_8/F03), where the draft wildlife attractants risk assessment demonstrates how we are proposing to manage bird strike risk that specifically considers Warton aerodrome.</p> <p>The Transmission Assets include appropriate mitigation to manage any effects that the Transmission Assets may have on Warton Aerodrome. This has been achieved through:</p> <ul style="list-style-type: none"> • the design of the Transmission Assets and the design commitments embedded in the Appendix A Wildlife Attractants Habitat Risk Assessment of the outline Wildlife Hazard Management Plan (REP5-106), illustrating how the requirement to design infrastructure, buildings and other elements from energy installations, as well as environmental mitigation in such a way so as not to increase the bird strike risk; and • the measures secured through the requirements including BAE and MoD's roles as named consultee in respect of Requirement 27 (Wildlife Hazard Management Plan) of the draft DCO (REP5a-018).
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REP5-195.4	<p>Q2513 Equalities impact assessment</p> <p>After watching the recording on compulsory acquisition hearing 1 part 2 I was amazed to hear that they had not done the assessment prior to application around protected characteristics I know they are a private company but considering it is going to a government organisation it should have been done and it also speaks to the lack of consultation carried out considering the cable route is populated with older adults and people that would fall into this group.</p>	<p>The Applicants submitted a Public Sector Equality Duty (PSED) Statement (REP5-092) which confirmed that the Applicants have provided a comprehensive assessment of the potential impacts of the project on “vulnerable groups” within the Human Health Annex (APP-035). Vulnerable groups are defined in section 1.11.5 of APP-035 to include children and young people, older people, low income groups, people with existing poor health including disability, those who share protected characteristics under the Equality Act 2010, and people living in deprivation (including those experiencing income and/or access and geographic vulnerability). The assessment concludes that there would be minor adverse, non-significant effects in EIA terms on vulnerable groups as a result of the construction of the development in relation to the impacts listed at 1.3.3.2(a), (b), (d), (e), (g) and (h) of the PSED Statement (REP5-092).</p> <p>The Applicants have updated the Equalities Impact Assessment (S_D1_8_F03) at Deadline 6 to bring together any comments received on its assessment and the outcomes of further discussions and engagement with relevant parties such as Wrea Green Equitation Centre.</p> <p>The Applicants are working with those identified sensitive receptors regarding communication and familiarisation plans ahead of construction starting to reduce any perceived impact. The mitigations being proposed relate to slow start procedures, site specific working hours for start up operations and deliveries along with increased engagement ahead of mobilisation operations.</p> <p>The Applicants remain committed to helping those who request support, and would encourage individuals to contact the Applicants directly by either calling 0800 915 2493 (please select option 3), Alternatively, you write to us by email at info@morecambeandmorgan.com or post to FREEPOST MORECAMBE AND MORGAN.</p>
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2.4 Lynda Goupil

Table 2-4: REP5-197 – Lynda Goupil

Reference	IP submission	Applicants' response
REP5-197.1	I now find there are more reasons to object regarding the proposed M&M onshore infrastructure having recently	The Applicants are sorry to hear that Ms Goupil did not feel she was made aware of the change of access. The Applicants would like to refer Ms Goupil to Annexes A.12

	<p>attended the recent events at FC Fylde where your project outlined some of the problems arising with local/national businesses etc., one which actually may affect me & of which I was not aware regarding change of access on REDACTED. Even now neither myself nor other locals know to what this 'change' refers? It was mentioned so quickly no one had chance to question this change. No one I have contacted can advise me either which is another example of how badly this project is being run! No locals have rec'd any notification of this change, hence why you're receiving little or no opposition to a lot of your plans. I am aware you did send letters to a very tiny selection of locals who literally live opp this 'change' but even they cannot understand what the 'change' is!</p>	<p>and A.13 of the Change Request Consultation Report Annexes document (REP5-155 and REP5-156) for more information.</p> <p>The extent of consultation was discussed with Blackpool Borough Council, Lancashire County Council and Fylde Borough Council and the extent of consultation was deemed proportionate to the reach of the proposed changes.</p> <p>The Applicants conducted a targeted non-statutory consultation for a period of 32 days, starting from Monday 11 August to 5pm Friday 12 September 2025 and note the consultation exceeded the minimum 28-day consultation period recommended in the PINS Change Request Advice under Step 3.</p> <p>As presented in the formal notice and in both postal correspondence and emails sent to consultees, a summary of the changes and the consultation period (including the deadline for responses) was clearly stated (see Annexes A10, A.11 and A.12 (REP5-155 and REP5-156)). The correspondence also provided contact details for the Applicants' team and encouraged consultees to contact the Applicants with any questions they may have regarding the Change Request.</p>
REP5-197.2	<p>When I attend some of these hearings I was also shocked to hear how dangerous a potential bird strike is. BAE advised they were unable to 'sign off' this point due to this phenomenon as they could not predict bird's behaviour & breeding habits. I do not see how BAE can overcome this situation nor how BAE will ever be able to sign off on this situation. Equally shocking was discovering, also at this event, that there is a major pipeline, the TPEP, the Trans Pennine Ethylene Pipeline, running north to south through the bk of Fylde & the fact the M&M drilling/tunnelling is going to meet this pipeline at right angles running east to west! This was literally 'explosive' new information. This appeared to be new information to must attending! I cannot believe this route is even vaguely still being considered & fact few locals are aware again is evidence of how poorly this has been advised to locals! The mere fact this route is still being considered by this project shows how irresponsible this choice of route is!</p>	<p>The Applicants take safety very seriously and recognise the concerns in relation to aviation. The Applicants are continuing to engage with Blackpool Airport and BAE Systems in relation to this, and are progressing positive discussions to ensure that appropriate mitigation is secured.</p> <p>The Applicants have previously responded to this matter further to BAE Systems Warton Aerodrome's comment within document The Applicants' Response to Relevant Representations Part 1 - Introduction and thematic responses (PDA-005) (please see paragraphs 2.21.2.4 to 2.21.2.7) and provided further detail in their Deadline 1 Cover letter (REP1-001). In particular the Applicants have responded to issues around bird strike in their response to Issue Specific Hearing 1 Action Point 40, in the Applicants' response to Hearing Action Points due at Deadline 1 (REP1-037). Further detail on the site selection for the mitigation and biodiversity benefit areas was submitted at Deadline 2 (REP2-046).</p> <p>The Applicants confirmed at Issue Specific Hearing 1 that engagement with BAE is ongoing in order to agree a strategy for a wildlife hazard management plan (see paragraphs 60 - 64 of The Applicants' Hearing Summary of Issue Specific Hearing 1 – Day 2 (REP1- 035)). The Applicants also provided responses in relation to this matter at ISH1_40 of The Applicants' response to Hearing Action Points at Deadline 1 (REP1-037) and provided further detail in relation to engagement with both BAE and Blackpool Airport in the Deadline 1 Cover letter (REP1-001). At Deadline 2, the Applicants have submitted the Strategy for Wildlife Hazard Management Plan (REP2-</p>

		<p>047) which has been shared with BAE and Blackpool Airport as part of the Applicants ongoing engagement with those bodies as explained in the Applicants responses to Blackpool Airport and BAE written representations in The Applicants Responses to Written Representations from Statutory Consultees and other organisations (REP2-031). At Deadline 3 the Applicants subsequently submitted the Outline Wildlife Hazard Management Plan (REP3-065), which was then updated at Deadline 5 (REP5-106).</p> <p>The Applicants do not consider that the Transmission Assets project will increase or alter the risk posed by bird strike to aircraft operating out of Warton Aerodrome or Blackpool Airport or that the project will create an increased risk to public safety.</p> <p>The Applicants have developed a Bird Strike Risk Assessment that considers potential changes to bird strike risk at Blackpool Airport. This has been agreed by Blackpool Airport as being suitable. Blackpool Airport will integrate the management of this risk into their existing management, as per the requirements of CAP 772 Wildlife hazard management at aerodromes/airports. The Applicants are working through a similar process at Warton Aerodrome and we are confident that we will reach a similar conclusion, information specifically about this can be found in the outline Wildlife Hazard Management Plan (S_D3_8/F03), where the draft wildlife attractants risk assessment demonstrates how we are proposing to manage bird strike risk that specifically considers Warton aerodrome.</p> <p>The Applicant's would like to assure Ms Goupil that they take the potential interaction with existing gas pipelines seriously. Details of appropriate working arrangements in the vicinity of the pipeline have been agreed with the owner, and have been included in the draft DCO at Deadline 6. To ensure safe and appropriate construction, detailed ground investigations will be undertaken post-consent to inform the final cable route design and construction methodology (which, where there is the potential for interaction with the pipeline, will require the approval of the owner). .</p> <p>As part of the project development the Applicants have engaged with all known and identified statutory undertakers, utility operators and private asset owners. The Applicants have followed an industry standard approach in identifying these interests that included:</p> <ul style="list-style-type: none"> • a formal utility search procured from Atkins Limited who are an experienced provider in the industry, • full title interrogation of all registered titles within the Red Line Boundary to identify registered charges, easements and other rights of any assets,
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		<ul style="list-style-type: none"> • issue of Land Interest Questionnaires to all identified interests in any parcel within the order limits requesting confirmation of the data we held and any additional data not previously known or disclosed. <p>Through this process and following receipt of the composite utility search data from Atkins, the Applicants have mapped all known and identified assets across the order limits within the Onshore Crossing Schedule (REP5a-024 and REP1-018). A programme of intrusive site investigations will be undertaken at the locations identified, with results from these investigations used to characterise ground conditions and to undertake a controlled risk assessment that will inform the detailed design on the trenchless technique locations.</p> <p>The detailed design will reflect the complexity of the crossing method and the entry and exit pit locations and the depth of the crossing. Therefore, trenchless technique installations will be designed at sufficient depths to prevent interaction with existing infrastructure. In addition, protective provisions with relevant asset owners and statutory bodies are being negotiated with the relevant parties and these will be secured within Schedule 10 of the draft DCO (REP5a-018), ensuring the continued safe operation of existing infrastructure throughout construction and operation of the Transmission Assets.</p> <p>The Applicants are committed to reducing impacts wherever possible and have now proposed to establish a Construction Coordination Working Group post-consent, which would involve specific engagement with the local planning authorities, to facilitate the exploration of opportunities and measures for coordination where possible and practicable between the projects in order to minimise impacts.</p>
REP5-197.3	Something else I hadn't realised the enormity of until I attended these events was how dangerous these large wagons & trucks are going to be on all our local, very narrow, quiet country lanes are going to be! Also the quantity & number of hours per day they will be working, 7am-6pm, in theory, it than transpired it's actually from 6am as the workers are allowed an hour prep before they start!	<p>The Applicants recognise the concern in relation to construction traffic on the local road networks and the hours of operation and would emphasise that this has been fully considered and assessed as part of the Environmental Impact Assessment process. Notably, Volume 3, Chapter 7: Traffic and Transport of the Environmental Statement (APP-108) contains an assessment of the potential impacts from the Transmission Assets on traffic and transport receptors, including the potential impacts of increased vehicle movements (i.e. Heavy Goods Vehicles (HGVs) and staff movements). The assessment has considered the potential impacts of the Transmission Assets in relation to driver delay, severance, non-motorised user delay, fear and intimidation, road safety and abnormal loads. The assessment concludes (with the application of mitigation measures) that the residual effects would not be significant in Environmental Impact Assessment (EIA) terms.</p>

		<p>The Applicants have also committed to the production of detailed Construction Traffic Management Plans (CTMPs) in accordance with the outline OCTMP (REP5-066). The OCTMP sets out measures to ensure that the numbers of HGV movements are managed and monitored so that the assessed numbers assessed in Volume 3: Chapter 7: Traffic and Transport (APP-108) of the ES are not exceeded. The OCTMP also included commitments to the implementation of measures to manage the movement of heavy good vehicles and abnormal loads along narrower load roads. The requirement to produce the detailed CTMP(s) in accordance with the OCTMP is secured by Requirement 9 of Schedules 2A and 2B of the draft DCO (REP5a-018).</p>
REP5-197.4	<p>I still don't know where to access all this information & nor do any of the people I contact, who often are the actual people affected by all this! I learn that a lot of these wagons will be travelling on a lot of these often single track, bk country lanes, where local cyclists, walkers, dog walkers, horse riders, joggers etc are regulars. This situation is surely going to end in tragedy, but it appears M&M put profit before lives</p>	<p>The Applicants recognise the significant level of information submitted as part of the Transmission Assets application and remain committed to helping those who request support, and would encourage individuals to contact the Applicants directly by either calling 0800 915 2493 (please select option 3). Alternatively, you can write to us by email at info@morecambeandmorgan.com or post to FREEPOST MORECAMBE AND MORGAN.</p> <p>The Applicants are aware of concerns relating to the interaction of cyclists and walkers with construction vehicles and consider that all uses of the road network can be accommodated. Volume 3, Chapter 7: Traffic and Transport (APP-108) of the Environmental Statement assessment has considered the potential impacts of the construction of the Transmission Assets and increases in traffic flows as a result of construction traffic upon non-motorised user delay and fear and intimidation (non-motorised user amenity) for users of the local and strategic road networks. The assessment concludes (with the application of the identified mitigation measures) that the residual effects would not be significant in Environmental Impact Assessment (EIA) terms.</p> <p>The Applicants note but respectfully disagree with Ms Goupil's comments regarding putting 'profit before lives'.</p>
REP5-197.5	<p>Finally, with the way the country is heading financially, what happens if the project runs out of money? Would it be cancelled and this major upheaval work is only halfway who will sort this farce out then?</p>	<p>With regards to the concerns around funding, the Applicants would first highlight that the Funding Statement (REP4-011) confirms the financial position of each Morgan and Morecambe. It clearly sets out that they have sufficient resources to fund their respective projects. The Applicants would further highlight that there are controls within the draft Development Consent Order (REP5a-018) that deal with the financial position of each Morgan and Morecambe. Article 33 prevents Morgan and Morecambe from exercising a number of powers prior to it putting into place a guarantee or security equal to its potential liability to compensation payable under the Order, which is approved by the Secretary of State. Alternatively, they must each provide proof that</p>

		<p>they have sufficient funding to meet any such liability. The Secretary of State must therefore be comfortable that the company would not risk entering financial difficulties. This process must be undertaken prior to undergoing key milestones in the Development such as compulsorily acquiring rights, or temporary use of land, which the Applicants would need to exercise prior to beginning construction.</p>
REP5-197.6	<p>I am still concerned with the effect on local, protected wildlife & also the drilling/trenching breaching the sand dunes, a natural flood defence, the building of estates of new housing already on saturated land with concrete foundations, the age discrimination throughout this process as most in st Anne's & surrounding areas are not having a voice in any of this as they do not have access to computers, I've mentioned this from the start as this is outright age discrimination! There is a much better site near Rossall which your project will not listen to as your people have decided, prob sat at a desk down south with maps and won't listen to others alternatives!</p>	<p>The Applicants recognise the concerns expressed by Ms Goupil and appreciate the importance of protecting the environment. The Applicants are committed to developing the Transmission Assets in a way that is sensitive to the environment, avoiding or minimising potential effects wherever possible, and have engaged with key environmental stakeholders throughout the application process to ensure appropriate mitigation measures can be implemented.</p> <p>The Applicants note the concerns regarding trenchless cable installation techniques beneath established sand dunes, and potential flooding impacts – this is something which the Applicants have considered at great length as part of refining the design in order to ensure there is no increased flood risk as a result of the Transmission Assets. Please refer to the Applicants' response to RR-0417.38 submitted at procedural deadline (PDA-007). This provides considerations on the low to very low risk of flooding and flood risk (including tidal flood risk) as a result of the installation method of the offshore export cable corridor beneath the Lytham St Anne's Dunes SSSI.</p> <p>The Applicants have also submitted an Outline Hydrogeological Risk Assessment of Lytham St Annes Dunes SSSI (REP3-061) at Deadline 3, which was subsequently updated at Deadline 5 (REP5-104). This assessed the potential risk that construction activities associated with the installation of the offshore export cables beneath the Lytham St Annes Dunes SSSI, Lytham St Annes LNR and St Annes Old Links Golf Course & Blackpool South Rail Line Biological Heritage Site (BHS) may pose to the sand dune features of these sites. The assessment indicates a low risk following potential secondary mitigation options which include placing the export cable within low permeability glacial clays to avoid water tables where present, possible use of shuttered sheet piling to limit groundwater ingress at the entry pits, re-infiltration of abstracted clean groundwater to ground. These potential refinement of options will be developed as part of detailed engineering design, and a detailed hydrogeological risk assessment will be prepared and agreed with the relevant consultees and stakeholders prior to commencement of the works in accordance with CoT128 (Volume 1, Annex 5.3: Commitments Register of the ES (REP5-027)).</p> <p>The Applicants submitted a Public Sector Equality Duty (PSED) Statement (REP5-092) which confirmed that the Applicants have provided a comprehensive assessment of the potential impacts of the project on "vulnerable groups" within the Human Health</p>

		<p>Annex (APP-035). Vulnerable groups are defined in section 1.11.5 of APP-035 to include children and young people, older people, low income groups, people with existing poor health including disability, those who share protected characteristics under the Equality Act 2010, and people living in deprivation (including those experiencing income and/or access and geographic vulnerability). The assessment concludes that there would be minor adverse, nonsignificant effects in EIA terms on vulnerable groups as a result of the construction of the development in relation to the impacts listed at 1.3.3.2(a), (b), (d), (e), (g) and (h) of the PSED Statement (REP5-092).</p> <p>The Applicants have updated the Equalities Impact Assessment (S_D1_8/F03) at Deadline 6 to bring together any comments received on its assessment and the outcomes of further discussions and engagement with relevant parties such as Wrea Green Equitation Centre.</p> <p>The Applicants are working with those identified sensitive receptors regarding communication and familiarisation plans ahead of construction starting to reduce any perceived impact. Such mitigations being proposed relate to slow start procedures, site specific working hours for start up operations and deliveries along with increased engagement ahead of mobilisation operations.</p> <p>The Applicants remain committed to helping those who request support, and would encourage individuals to contact the Applicants directly by either calling 0800 915 2493 (please select option 3), Alternatively, you write to us by email at info@morecambeandmorgan.com or post to FREEPOST MORECAMBE AND MORGAN.</p>
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2.5 Michael Dziubinki

Table 2-5: REP5-200 – Michael Dziubinki

Reference	IP submission	Applicants' response
REP5-200.1	I cannot understand why the Ribble estuary has not been considered for the Fylde windfarm power cables. Surely this option would save both local businesses, tourism, the environment and cable laying costs. If this was anywhere in Europe it would be a no brainer.	<p>The Applicants welcome Mr Dziubinki's comments.</p> <p>A full reasoning and justification for the selection of the onshore infrastructure, including the range of criteria used and developed throughout the iterative process is provided in Section 4.9 of Volume 1, Chapter 4: Site Selection and Consideration of</p>

		<p>Alternatives (AS-026). This is also supported by Volume 1, Annex 4.3: Selection and Refinement of the Onshore Infrastructure (AS-028).</p> <p>The optimum route in terms of minimising impacts, costs and ensuring feasible delivery for an onshore grid connection is generally considered to be the shortest route from A to B from landfall to the National Grid Penwortham substation with consideration of a range of constraints which are then considered when 'micro-siting' the cable. The final route presented is considered to effectively achieve this, within the environmental, technical and social constraints that have been identified along the proposed onshore export cable corridor route.</p>
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2.6 Samantha Rimmer

Table 2-6: REP5-201 – Samantha Rimmer

Reference	IP submission	Applicants' response
REP5-201.1	I would like the option to vote against the planning of cables going g through the village where I reside	This response is noted by the Applicants.