

**APPLICATION BY MORGAN OFFSHORE WIND LIMITED AND  
MORECAMBE OFFSHORE WINDFARM LIMITED FOR A  
DEVELOPMENT CONSENT ORDER FOR THE MORGAN AND  
MORECAMBE OFFSHORE WIND FARMS TRANSMISSION ASSETS  
DEADLINE 6 SUBMISSION BY LANCASHIRE COUNTY COUNCIL**

**22<sup>nd</sup> OCTOBER 2025**

## **1. Introduction**

- 1.1. This submission sets out Lancashire County Council's (LCCs) Deadline 6 submission for the Development Consent Order application for the Morgan and Morecambe Offshore Windfarm Transmission Assets Generation Assets ('the Scheme'). It includes written submissions following Issue Specific Hearing 4 (ISH4) on Tuesday 7th October 2025 and Wednesday 8th October 2025 and responses to the Examining Authority's Action points arising from Issue Specific Hearing 4 (ISH4).
- 1.2. In relation to the Examining Authority's Action Points arising from Issue Specific Hearing 4 (ISH4) (EV10-018), the responses only deal with the questions addressed to LCC. Other questions addressed to the applicant and other parties are not included.

## **2. Written submissions by Lancashire County Council following Issue Specific Hearing 4 (ISH4) on Tuesday 7th October 2025 and Wednesday 8th October 2025**

- 2.1. The comments set out below are made by the LCC, following Issue Specific Hearing 4 (ISH4) on Tuesday 7th October 2025 and Wednesday 8th October 2025. They follow the structure of the items set out in the Agenda, although only those items are listed in relation to which additional comments are included.

## **3. Item 4 Landscape and Visual Matters**

- 3.1. Since ISH 4 LCC has returned comments to the Applicants on the Outline Design Principles Document Ref. J3\_F02 (REP5-064). A copy of those comments are attached as Appendix A to this submission. LCC also returned comments on the Landscape and Visual Resources section of the Morgan And Morecambe Offshore Wind Farms: Transmission Assets Lancashire County Council SOCG Document Ref. S\_D1\_6.1/F03 (REP4-079). A copy of LCC's comments are attached as Appendix B. In addition LCC has returned comments on the Green Belt and Separation section of the of the Morgan and Morecambe Offshore Wind Farms: Transmission Assets Lancashire County Council SOCG Document Ref. S\_D1\_6.1/F03 (REP4-079). A copy of these comments are attached as Appendix C.
- 3.2. LCC Landscape has concerns both in terms of the location and selection of Substation sites in the Green Belt, the significant effects on spatial and visual elements particularly to openness, their permanence and the intrinsic, irreversible and fundamental changes to both Green Belt and Landscape Character.
- 3.3. It is considered that currently the Landscape Proposals/Strategy and the Outline Design Principles in particular, do not sufficiently address the potential residual impacts and that the Applicant has not yet 'minimised' the effects, which can be reasonably avoided, reduced and mitigated. Proposals are not considered proportionate to the proposed scale of development of the two substations. These would likely include off site planting, an agreed manipulation

of levels and gradients, potential relocation of Public Rights of Way and the Bridleway. These measures are not considered overly onerous on the Applicant. Further commitments are required which guarantee measures to achieve better aesthetic and design solutions than currently proposed. The use of an independent Design Review Panel would be welcomed.

- 3.4. In terms of the wider Transmission Assets alignment of particular concern is the spatial and visual aspects on landfall area, especially given its essential amenity value. To all areas the duration and the magnitude of visual effects that could be incurred over time (particularly if there should be considerable delay between the two separate projects) and how this would affect the management, appearance and ultimately restoration of the landscape is still a concern. Restoration should as far as possible be a like for like (accepting trees not planted on cables), but noting that existing pond areas should be replaced in field areas, to continue to provide ecological 'stepping stones' throughout the landscape and in accordance with the existing landscape pattern.
- 3.5. At this point the County Council would like to state the difficulties that have been experienced with properly engaging with the applicant on these issues. The applicant's need for flexibility in terms of final design is recognised but the design, visual and landscape information that was submitted with the original application, particularly in relation to the substations, was considered to be deficient and did not allow a proper assessment of visual impacts in the County Council's view. Whilst some recent progress has been made with the applicant on these issues, the County Council is disappointed that not more has not been achieved. The sole objective of the County Council has been to ensure a development which would minimise impacts on the Green Belt and countryside and the people who live and work nearby.

#### **4. Item 5 Transportation and Traffic Matters**

- 4.1. The following provides Lancashire County Council Highways (as the Local Highway Authority or LHA) Interim Update to the proposals for the Morgan and Morecambe Offshore Wind Farms Transmission Assets.
- 4.2. Following comments provided by Mr Stevens (on behalf of the LHA) at the Specific Hearing 2 (ISH2) on 30th July 2025, the Issue Specific Hearing 3 (ISH3) on 31st July 2025, and LCC Highways comments submitted at Deadline 4, the applicant has worked collaboratively with the LHA to overcome the LHA's concerns raised at the above events/submissions.
- 4.3. At Deadline 4 the LHA had concerns with both accesses and links, whilst much new information has been recently received, which is being reviewed, the current position is:

1. Compound/working area access, are summarised in the Table below:

Access Number	Brief description of current concern or where there is lack of information/evidence (that needs to be provided)
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A9a to A9b	Ensuring vehicles do not route between the accesses across the M55 to Heyhouses Link Road.
A33	Inclusion of hedgerow to be removed, and improving swept path for HGVs.
A38 to A41	Further detail on the operation of signals and location of signal and signage.
A44 to A47	Further detail on self-enforcing speed reduction measures and visibility.
A53	Extension of visibility splay.
A57	Further detail on the use of the concerns with use of the Guild Wheel for access.
A58	Further detail on the management of pedestrian/cyclists.
A59	Further detail on visibility and management of movements.
A63	Improvement to pedestrian crossing distance.

2. Local highway network routes are summarised in the table below:

Link Number	Brief description of current concern or where there is lack of information/evidence (that needs to be provided)
22b - Blackpool Road North 102 - The Hamlet / Appealing Ln / Leach Ln 43a - B5260 Fox Lane Ends	Further detail on the management of existing on street parking.
31a - Ballam Road 39a - B5259 Moss Side Ln / The Green 39b - B5259 Lytham Rd / Saltcotes Rd 41 - Ballam Road 43a - B5260 Fox Lane Ends 43b - B5260 Fox Lane Ends / Station Rd 46 - Bryning Ln / The Green 53 - Kirkham Rd / Freckleton Rd 101 - Howick Cross Ln 102 - The Hamlet / Appealing Ln / Leach Ln	Further detail on the suitability of the route for HGV movements (including swept path analysis with any resulting necessary mitigation / management measures).

72 - Wallend Rd (Private Road)	Further detail on the management of pedestrian/cyclists
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### 3. Other matters relating to the Outline Construction Management Plan:

- Waiting areas for proposed construction vehicles.
- Further detail on monitoring of movements at accesses and routing.
- Constraint specific mitigation measures for links.
- Further detail on road condition monitoring and maintenance.

4.4. Following the submission of LCC Highways comments at Deadline 4, a series of workshops between the Applicants and the LHA have taken place to obtain necessary clarifications and proposals to mitigate the impacts of the development.

4.5. Dates of workshops between the Applicant and the LHA post Deadline 4:

- Thursday 18th September – 2 hours
- Thursday 25th September – 2 hours
- Monday 29th September – 3 hours
- Monday 6th October – 1 hour
- Friday 10th October – 2 hours
- Monday 13th October – 4 hours

4.6. LCC Highways (as LHA) are content with the additional information / changes discussed and presented within the workshops, in regard to the concerns and areas for further detail highlighted above. The workshops included the presentation and discussion of updates to accesses (including the removal of the proposed use of A57 - The Guild Wheel), supporting swept paths for highway links (having regard to carriageway widths) and updates to the outline Construction Traffic Management Plan. Whilst the latest workshop concluded on 13th October, the documentation including the additional information / changes discussed have been provided to the LHA for review via email on 15th and 16th October. This review is currently ongoing.

4.7. Under a scenario that all areas of discussion and agreement have been included, the likely impacts of the development will NOT result in conditions that are considered severe in network reliability and safety terms (severe is referenced in terms as per the NPPF). However, this position can only be confirmed following the LHA's review of the latest documentation, which will be provided by the LHA at Deadline 7.

## 5. **Item 6 Socio-Economic and Land use**

5.1. LCC Public Rights of Way do not agree that all its matters have been concluded for Item 6 (Socio-Economic) and as such further comment will be provided at final deadline 7.

- 5.2. To enable the Applicants to address LCC's outstanding concerns the following comments on the Outline PRow Management Plan have been communicated to the Applicants.
- 5.3. Although the wording of the Outline Public Rights of Way (PRow) Management Plan (F05) (Rep5a-034) has been improved, the following are to be addressed for the item to be approved.
- 5.4. Signage and information during construction. The seven day notice period remains too short. This should be increased to 2 weeks and to enable sufficient time for the proposed closures and the temporary alternative of such closure, the discharging is to be **a minimum** of 10-weeks, not 10-weeks as stated within the revised document.
- 5.5. Figures 1.1, 1.2 and 1.3 include gates across the line of the PRow – gates that would restrict 24/7 access along the diverted route are not supported. The general arrangement figures should exclude the inclusion of any limitation across the diverted public path, providing unrestricted passage. This is not to say there may not be a situation necessitating the inclusion of a limitation, for example a self-closing pedestrian either with or without a meshed hoop to BS 5709:2018 standards, however this would be the exception rather than the rule. The reference to gates other than for stock control should be removed throughout the document.
- 5.6. Access 57 via the use of the Guild Wheel and footpath FP0608021 at Lea has been removed although the route remains within Figure 1.10.
- 5.7. No agreement has been reached with regard the use of Bridleway BW0502016/Anna's Road as part of the access track, as such the inclusion of its diversion within the document is not supported at this time.

## **6. Item 7 Onshore Ecology/Biodiversity**

- 6.1. The LLC Ecologist was unable to attend ISH4 but has the following additional comments arising from the Examining Authority's General and Cross-Topic Questions, in relation to which responses were previously provided at Deadline 5 and the subsequent discussion at ISH4.

### Q2:6.1.8 Peat

- 6.2. The discussions appear to relate to peat soils rather than peatland habitats. As such, whilst there may be some links to ecology, this is principally a soil management matter.

### Q2:6.2.4 Biodiversity

- 6.3. The LCC Ecologist has reviewed Rep5-145 (Biodiversity Benefit - Supporting Statement) in respect of ecology matters. The applicant contends that the delivery of biodiversity benefits is a voluntary matter. However, whilst a mandatory 10% biodiversity net gain does not apply to this application, the

County Council considers that the requirements of national policy should be met.

#### Requirements of NPS EN-1

- 6.4. Section 4.6 of National Policy Statement for Energy (EN-1) includes requirements for biodiversity gains, for example:
- Section 4.6.6 states that "Energy NSIP proposals, whether onshore or offshore, should seek opportunities to contribute to and enhance the natural environment by providing net gains for biodiversity, and the wider environment where possible";
  - Section 4.6.7 states that "In England applicants for onshore elements of any development are encouraged to use the latest version of the biodiversity metric to calculate their biodiversity baseline and present planned biodiversity net gain outcomes. This calculation data should be presented in full as part of their application"; and
  - Section 4.6.11: states that "Biodiversity net gain can be delivered onsite or wholly or partially off-site. We encourage details of any off-site delivery of biodiversity net gain to be set out within the application for development consent".

#### Requirements of the National Planning Policy Framework

- 6.5. Paragraph 187 states that planning decisions should contribute to and enhance the natural and local environment by minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures.

#### Whole Order Limits BNG Assessment: Summary

- 6.6. Table 3 of the Biodiversity Benefit Supporting Statement provides a summary Whole Order Limits BNG Assessment. Whilst it is recognised that the final footprint of habitat losses may not cover the whole of the order limits, the results given in Table 3 indicate significant biodiversity losses, which would not meet the requirements of relevant national policies mentioned above.

#### Departure from the Biodiversity Metric User Guide

- 6.7. Although the applicant has used the latest version of the DEFRA Biodiversity Metric, it has not been applied in accordance with the DEFRA Biodiversity Metric User Guide. Specifically, it appears that there are habitat losses that will not be restored to baseline type and condition within two years, which have not been taken into account (See section 6 of the DEFRA user guide). As such, time lag impacts/temporal risks on biodiversity have not been properly taken into account, resulting in understated biodiversity losses.

### Approach of Other DCO Schemes

- 6.8. Section 1.1.1.2 of the Biodiversity Benefit Statement states that "The Applicants consider that a proportionate and pragmatic approach to BNG has been adopted by only including above ground permanent infrastructure. This is considered to be in line with National Policy Statement (NPS EN-1) and the guidance in the National Planning Policy Framework (NPPF) for the delivery of no net loss and measurable net gains. The approach has also been demonstrated as being acceptable for other similar DCO projects as shown in Table 4".
- 6.9. However, restricting biodiversity gain calculations to above ground permanent infrastructure is not consistent with the approach taken for the majority of examples given including:

#### Rampion 2 Offshore Wind Farm

- Commitment to 10% net gain for all onshore and intertidal (above the low water mark) habitats subject to permanent or temporary losses.

#### North Falls Offshore Wind Farm

- Habitat losses not considered temporary where reinstatement to baseline condition would not be possible within 2-year timescale.

#### Dogger Bank South Offshore Windfarms

- Assumed 50% of the temporary construction compounds would be reinstated within 2 years and therefore excluded from baseline calculations.

### Hierarchy to delivering Biodiversity Benefit

- 6.10. Table 5 of the Biodiversity Benefit Supporting Statement introduces a new Hierarchy to delivering Biodiversity Benefit.
- 6.11. The options given within the proposed hierarchy need not be mutually exclusive. For example, if onsite biodiversity enhancements do not meet the requirements of national policy (or if they need to be reduced for air traffic safety reasons), then they can be combined with off-site measures.
- 6.12. Option 3 given within Table 5 relates to providing funding to support alternative biodiversity projects in the nearby area. This option does not currently provide sufficient certainty that the necessary type and quantity of biodiversity units can be delivered. For example, there is currently uncertainty over:
- The amount of funding (this could potentially be based on the price of national BNG credits following calculation of losses in line with the DEFRA metric user guide);
  - Funding mechanisms;



- Administration of the proposed system;
- Delivery mechanisms;
- Potential location of biodiversity enhancement (and the relationship to Lancashire's emerging Local Nature Recovery Strategy);
- Type of biodiversity enhancement;
- Number of biodiversity units that would be provided;
- Securing long-term maintenance;

6.13. Option 4 relates to purchase of Biodiversity Credits. It needs to be ensured that there is no confusion between Biodiversity Credits and Biodiversity Units. There appears to be some confusion within the report as follows:

- Within Table 2, the applicant discusses:
  - "purchasing Biodiversity Credits from an offsetting provider to meet the shortfall in units"; and
  - "alternative provision for offsetting through either funding of suitable projects in the local area or the purchase of offsetting credits from a registered provider";
- Table 5, in relation to Option 4 states that "This could be delivered via a scheme to be approved by the relevant planning authority as set out in a Requirement of the DCO securing biodiversity benefit".

6.14. Statutory Biodiversity Credits are purchased from Government and the applicant would not be able to determine how they are spent. Purchase of Credits could result in biodiversity enhancements outside of the county which would not be a desirable outcome. It would also need to be established that Biodiversity Credits can be made available to a scheme that is not subject to mandatory 10% BNG.

6.15. If the intention is to purchase biodiversity units from an established habitat bank, then it would need to be ensured that the correct types and quantities of biodiversity units are available to purchase, taking into account the location of the habitat bank. It would also need to be established that the Biodiversity Units are available to a scheme that is not subject to mandatory 10% BNG, taking account of the process for registering and allocating units on the national register.

#### Bird Strike Risk

6.16. Uncertainty around conflicts between ecological mitigation and aviation risk appear to remain. The County Council's ecologist is not qualified to comment on bird strike risk or air traffic safety matters. However, as per the earlier response to the Examining Authority's written questions, as long as the requirements of legislation, national policy and recognised best practice guidance are met, then departures from the applicant's own site selection guiding principles could be allowed, including mitigation outside of wildlife hazard management zones.

## **7. Item 10 Draft Development Consent Order**

- 7.1. LCC has the following comments on the revised version of the draft Development Consent Order (REP5-010).

### Article 10 (Power to Alter Layout etc. of Streets)

- 7.2. See Paragraph 8.2 below.

### Article 40 Protective Provisions

- 7.3. The Applicants and the LLFA have worked collaboratively to progress the Protective Provisions. The Applicants provided comments to the LLFA on 30 September. These comments confirmed agreement with the majority of points raised by the LLFA, with a few outstanding points. After reviewing the Applicants' comments, the LLFA returned further revisions on 3 October and 6 October, focussed on notice arrangements and indemnity provisions. A meeting on 16 October 2025 focussed on the LLFA power to enter land, as disapplying s.23 Land Drainage Act 1991 consequentially disappplies s.24 and s.64 (entry power) of that Act. A revision was received on 21st October 2025 from the Applicants including changes seeking to address the concerns, with s.24 and consequently s.64 being reapplied to some degree, and is being actively considered by the LLFA. Both parties remain optimistic that an agreement can be reached on the remaining issues before the examination concludes.

### Requirement 10 (Highway Accesses)

- 7.4. See Paragraph 8.4 below.

### Requirement 14 (Construction Hours)

- 7.5. See Paragraph 8.5 below.

### Requirement 20 (Operational Drainage Management Plan)

- 7.6. The LLFA attended ISH4 but did not raise any points during the discussion on Requirement 20 (Operational Drainage Management Plan) as it agrees to and welcomes the updates made to this part of the draft Development Consent Order.

- 7.7. In the LLFAs view, the revision to Requirement 20 now correctly reflects the approval and consultation bodies for the detailed Operational Drainage Management Plan, and it has no outstanding concerns.

### Requirement 25 (Onshore Collaboration)

- 7.8. See Paragraph 8.7 below.

### Requirement 26 (Biodiversity Benefit)

7.9. See Paragraph 8.9 below.

**8. Examining Authority's Action points arising from Issue Specific Hearing 4 (ISH4).**

8.1. The following section sets out LCC's responses to Examining Authority's Action Points (EV10-018) arising from Issue Specific Hearing 4 (ISH4) in relation to questions addressed to LCC.

**Agenda item 9 – Draft Development Consent Order**

17. Confirm if the councils have any outstanding comments on Article 10.

8.2. LCC as LHA requests the following amendments to Article 10 (with the amendment shown in italics):

Article 10:

**Power to alter layout etc. of streets**

**10.**—(1) Subject to paragraphs (2) and (3), the undertaker may, in so far as may be expedient or necessary for the purposes of or in connection with constructing, operating and maintaining the authorised project alter the layout of any street and, without limitation on the scope of this paragraph, the undertaker may—

(a) alter the level or increase the width of the street including any kerb, footway, cycle track or verge; and

(b) make and maintain passing place(s).

(2) The undertaker must restore any street that has been temporarily altered under this article to the reasonable satisfaction of the street authority.

(3) The powers conferred by paragraph (1) must not be exercised without the consent of the street authority, *and must be exercised under a signed Highway Act agreement.*

(4) Paragraphs (2) and (3) do not apply where the undertaker is the street authority for a street in which the works are being carried out.

*(5) The reference to streets in paragraphs (1), (2), (3) and (4) relate to highway maintainable at public expense.*

*(6) Any works subject to (1) must satisfy all individual user needs, highway safety and design standards.*

*(7) The developer will be responsible for the consequential impacts of any works under (1), for example, part 1 land compensation claims.*

32. Confirm satisfaction with the wording of Requirement 10 and engage with the applicants on this prior to Deadline 6 where necessary.

8.3. LCC as LHA requests the following amendments to Requirement 10 (with the amendment shown in italics):

8.4.

Requirement 10:

## Highway accesses

**10.—**(1) No new temporary or permanent means of access to a highway to be used by vehicular traffic, or any temporary or permanent alteration to an existing means of access to a highway used by vehicular traffic, may be formed for the Project A onshore works or Project A intertidal works until a highways access management plan for that access has been submitted to and approved in writing by the relevant *planning authority, in consultation with the appropriate highway authority. Each highways access management plan shall satisfy all individual user needs, highway safety and design standards*, and in relation to the Project A Blackpool Airport works, shall be prepared in consultation with BAOL to the extent specified in the outline highway access management plan.  
(2) Each highways access management plan must accord with the outline highways access management plan.  
(3) The highway accesses must be implemented as approved, *under a signed Highways Act agreement*.

33. Provide to the Examining Authority any alternative drafting in relation to construction working hours (Requirement 14)

- 8.5. As set out in LCC's Deadline 5 submission, the County Council considers that the start time for construction works on Saturdays should be amended from 0700 to 0800 where works are proposed with 200m of noise sensitive properties.
- 8.6. This could be achieved by including in sub-paragraph (1) of Requirement 14 the following additional wording:

The construction of Project A/B onshore works and Project A/B intertidal works, and construction-related traffic movements to or from the site of the relevant work within 200m of any noise sensitive properties, which are to be identified in the Code of Construction Practice shall take place, only between the hours of 0700 and 1900 from Monday to Friday, and 0800 to 1300 on Saturday, with no activity on Sundays or bank holidays.

36. Provide any comments to the applicants on Requirement 25 and the updates to the CoCP and other management plans regarding the Construction Coordination Working Group.

- 8.7. In response to the comments set out in LCC's Deadline 5 Submission the Applicants have advised that the wording of Requirement 25, paragraph (b) has been amended to state (with the amendment shown in italics):
- (b) When submitting any plan, scheme, details or document referred to in sub-paragraph (1) for approval, Morgan/Morecambe must submit any comments duly received from Morgan/Morecambe *together with a statement setting out how these have been taken into account or where*

*they have not, why this has been the case or if no comments were received* a statement confirming that no such comments were received.

8.8. LCC is content to agree with the proposed amended wording.

38. Provide comments to the applicants on the proposed updated Requirement 26 drafting.

8.9. LCC requests that the wording of Requirement 26 is amended to state (with the amendment shown in italics):

26. Unless otherwise agreed with the relevant planning authority, written evidence (in the form of the outputs of the biodiversity metric) demonstrating how biodiversity benefit in accordance with the onshore Biodiversity Benefit Statement is to be delivered as part of Project A/B must be submitted to the relevant planning authority *for written approval* no later than the date on which Project A is first brought into commercial operation. *The Biodiversity Benefit Statement shall include details of the timescales for its implementation. The biodiversity benefit shall thereafter be delivered in accordance with the approved Biodiversity Benefit Statement including the approved timescales for its implementation.*



**Appendix A - LCC Comments on the Outline Design Principles Document Ref.  
J3\_F02 (REP5-064).**

**Ref: Planning Inspectorate No: EN020032**

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

**DEADLINE 6 - RESPONSE TO LANDSCAPE MATTERS; relating to landscape  
Comments by LCC Landscape Architect on Outline Design  
Principles J3/F02\_22 September 2025**

Planning Officer: Jonathan Haine

**LANDSCAPE COMMENTS**

Date: 14.10.25

**1.0 Introduction**

- 1.1 It is commented that this document merely develops the Applicant's proposal and does not acknowledge several issues constantly and repeatedly raised by LCC Landscape from and in previous comments back to the Applicants. In this manner the ODP seems little further progressed than the first issue.
- 1.2 It is observed that Applicants appear to take comments from the various Planning Authorities and reword their documentation to appear as if issues have been addressed. There is little iterative process which has been achieved over the previous 6 month period. This affords little confidence as to how the interpretation of 'Good Design' might progress post consent.
- 1.3 Comments should also cross reference previous comments: RESPONSE TO LANDSCAPE MATTERS; relating to outline Design Principles F01 August 2025, by LCC Landscape Architect, dated : 03.09.25

1.4 References are from the document noted above.

**2.0 Comments**

- 2.1 Ref 1.3.1.5 First and Fourth Bullet: It is noted that LCC Landscape disagree with this statement. The Applicant uses the elements from the various NPS's to suit their argument.
- 2.2 Ref 1.4.1.1: First Bullet: Again it is subjective that the Applicant considers that they have demonstrated 'an understanding of the local (landscape) context...to shape design proposals. LCC Landscape do not agree that this has been or could be achieved. Whatever would be achieved would be a compromise given the scale and form of Proposed Development. 5<sup>th</sup> Bullet: Is 'Good Design' post consent not then an issue? Fourth bullet: 'Good Design' would not have the Proposed Development within Green Belt.
- 2.3 Ref 2.1.1.2: Disagree with what stated. How has what stated been achieved is not stated, empty words which are meaningless. The Landscape Character is obliterated by the Proposed Development, openness would be removed as would green rural areas, visual and noise effects on the Bridleway and PRow. The Applicant has not 'actively sought'



solutions. The Proposals have not changed or been updated in over a 6 month period, despite repeated efforts on behalf of the Planning Authorities.

- 2.4 Ref Tables and Figures generally: Does the Applicant deliberately use a scale of Figure or Table that is completely illegible? This does not enable sufficient assessment and misinforms the reader by neglect.
- 2.5 Ref 2.3.1.1: It is noted once again that the radii for the siting of Substations should have considered greater radii than the 5 and 8km scenarios, to enable the Green Belt location , which should have been considered a constraint, to permit Substation locations outside the Green Belt. Not taking this decision has assumed a presumption for allowance of development in the Green Belt.
- 2.4 Ref 2.4.1.1-3: These paragraphs fail to denote the openness of the area, the fact of the Area of Separation directly on the site's eastern boundary, fails to mention the presence of frequent field ponds on site and around and the surrounding land use pattern.
- 2.5 Ref 2.4.2.1: It might be useful to state just how far the Morecambe Substation is from the Morgan Substation to enable an understanding of proximity. If a site varies in level 3m over a relatively small area then the site is not flat as stated. The Applicant again needs to be more honest. Morecambe Substation is located on ground which appears significantly raised from the surrounding area, it is effectively on a localised ridgeline- this is clearly apparent on Viewpoints when viewing from the south and east, particularly the PROW's. It fails to note that the Bridleway is located to the north of the site. There is insufficient description and detail- about land use, distinctly open and prominent views of the Substation site. This then underplays the rural and open character of the Green Belt.
- 2.6 Ref 2.4.7.3: It is disagreed that the countryside around Substation sites can be collectively described as 'intimate' (see also 2.5 above). This Green Belt area is strongly characterised by the long and open views it offers in all directions.
- 2.7 Ref 2.4.7.5: It is considered that there should be reference here to Green Belt and Area of Separation, even if not 'designated' they do demonstrate that the areas are valued and that there is a purpose to the areas. Again this demonstrates a lack of honesty and an underplaying of the Value of the Green Belt and adjacent areas.
- 2.8 Ref 2.4.7.7: It is disagreed that the Morgan Substation site is flat- it is part of a ridgeline. Ponds on the site are characteristic as well as the wider area. It is acknowledged that though Power Lines exist within the area, that they are not overly dominant in the rural setting and most importantly they allow the landscape to flow through and around, whilst 4 No. 140m x 80m x 15m buildings plus associated switchgear etc. do not.
- 2.9 Contradictory terms used by the Applicant. Paragraph 2.4.7.7 notes the site as 'flat', whilst Para 2.4.7.3 notes the site as undulating. Request honesty and accuracy.
- 2.10 Ref 2.4.7.8-9: This underplays the value of hedgerows by noting of 'low quality'. This should be qualified. Hedgerows comprising native species have high value both ecologically and visually/ aesthetically.
- 2.11 Ref 2.4.7.11: use of the word 'appropriate' is subjective and concerns the Applicants viewpoint only. LCC Landscape consider there is not yet sufficient mitigation proposed, particularly west of the Bridleway, but also in the consideration of other options not as yet

detailed by the Applicant, but which have repeatedly been noted. These could have significant benefits not just for integration of landscape character, but also visually for those living and working within greatest proximity to the site. It is also disagreed that the oLMP has the ability to be used as a sufficient design tool. From what detailed to date, this would be of use for Detailed Design only, not for the fundamental principles of the design layout, which is the current stage of works.

- 2.12 Ref 2.4.7.12: It is strongly disagreed that as the Applicant states 'Reflecting existing landscape character has been central to this approach'. (See also response to 2.3.1.1). Numerous previous LCC Landscape responses have detailed why this is not considered the situation. Also with reference to this paragraph it is queried how the Applicant can state that scale, form and materiality are responsive to context? An urban context maybe, but this is a Green Belt and rural area and as stated previously nothing regarding the scale, form, materiality to date suggests it can be integrated to its Green Belt and rural context. Use of words ...'mitigation becomes part of the design language.... rather than an applied layer'. This is strongly disagreed as has been repeatedly stated. There is very little demonstration and iterative working to establish a best case scenario in terms of mitigation.
- 2.13 Ref 2.4.7.13: It is strongly disagreed that the Applicants have worked closely with the Landscape Strategy 2000. The pattern of widespread ponds in field areas is not reflected, small irregular woodland blocks have not been reflected in the Landscape Proposals/ Strategy. Most importantly the Landscape Institute (LI) notes that many Landscape Strategies are now out of date and that Councils have not the funding to replace these. It recommends where this is the case the Applicant should carry out their own localised Landscape Character Assessment. Given The Landscape Strategy is 25 years old this is considered out of date in some instances. Many consultants on other LCC schemes have and do carry out localised Landscape Character Assessments. The Applicants have not followed LI guidance in this regard.
- 2.14 Ref 2.4.7.14: The first bullet needs to include for the reinstatement of field ponds. 3<sup>rd</sup> Bullet somewhat confusing, but would disagree if understanding is correct this is achieved, due to the very nature of the linear development of the cables.
- 2.15 Ref 2.4.7.15: **This paragraph in whole is strongly disagreed.**
- 2.16 Ref 3.2.2: With regards to NPS EN-1,3 and 5 the Applicant notes many references but omits to include the following;

NPS EN-1

4.2.11 states: *Applicants should demonstrate that all residual impacts are those that **cannot be avoided, reduced or mitigated.***

4.2.12 states... *The **cumulative impacts of multiple developments** with residual impacts should also be considered*

5.10.28 states; *Depending on the topography of the surrounding terrain and areas of population it may be **appropriate to undertake landscaping off site.** For example, filling in gaps in existing tree and hedge lines may mitigate the impact when viewed from a more distant vista.*

5.10.30 states; *The Secretary of State should be satisfied that local authorities will have **sufficient design content secured** to ensure future consenting will meet landscape, visual and good design objectives.*

5.11.30 states; *The Secretary of State should expect applicants to take appropriate mitigation measures to address adverse effects on coastal access, National Trails, other rights of way and open access land and, where appropriate, to consider what opportunities there may be **to improve or create new access. In considering revisions to an existing right of way, consideration should be given to the use, character, attractiveness, and convenience of the right of way.***

NPS EN-3

2.3.7 states: *The Secretary of State should have regard to the aims, goals and targets (including targets set under the Environment Act 2021) of the government's Environmental Improvement Plan<sup>7</sup> (of which the 25 Year Environment Plan<sup>8</sup> is the first), .....and compliance with the Environment Act 2021.<sup>10</sup>*

NPS EN-5

2.2.8 states: *There will usually be a degree of flexibility in the location of the development's associated substations, and applicants should consider carefully their location, as well as their design.*

With reference to the Horlock Rules it is stated:

***make the design of access roads, perimeter fencing, earth-shaping, planting and ancillary development an integral part of the site layout and design, so as to fit in with the surroundings.***

- 2.17 Ref Section 4: It is argued that the Applicants interpretation of 'Good Design' lies heavily weighted against functionality of the Proposed Development. Whilst it is understood how the NPS places due onus on this, the argument with the Applicants documentation is that 'good design' in terms of visual and landscape effects is not sufficiently robust and proportionate and that further efforts should be made with reference to the quoted Horlock Rules above. It is also argued that (as NPS EN 1 states) otherwise residual effects relating to landscape and visual, which could be addressed, have not yet been avoided, reduced or mitigated sufficiently.
- 2.18 Ref 4.4.1.1: 5<sup>th</sup> bullet: The Applicants Design Champion, though welcomed does not and cannot guarantee unbiased and independent 'good design' post consent.
- 2.19 Ref 4.5.1.2: It is not considered that the first and third bullets have yet been met and that there is more that could be achieved.

Table 4.1

People: 'be a considerate neighbour'-taking stakeholder feedback into account and making use of local knowledge: More could be done to improve this, don't consider this is achieved as yet.

Consider this has been a tick box exercise only and has not yet resulted in real actions to ensure that the design complements local character as far as is reasonably practicable.

Places: Landscape Resoration; 'wherever possible' is not sufficient, need definite and guaranteed actions. Ponds throughout the length also need including.

Value: Respect the landscape and avoid sensitive features; Disagree Very strongly. By the substations very placement in the Green Belt does not acknowledge or recognise the constraint, which Green Belt should have warranted.

Equally the lack of design development over the e.g. last 6 month period demonstrates the Applicants lack on intention with regards to respect to landscape character and sense of place.

It is strongly disagreed that proposals are landscape led, fundamentally it is a commercially led approach.

- 2.20 Ref 4.6.1.2: Disagree strongly. What and where is the evidence that concerns have been addressed?
- 2.21 Ref: 4.6.1.3: Landscape Strategy has not evolved.
- 2.22 Ref 4.6.1.4: Detailed Design as stated assumes that landscape Proposals/ Strategy is already agreed- by wording as such there is implication that Stage of Works is complete- it is not yet agreed. (See Landscape Institute Work Stages...currently at Concept Design...not Detailed Design).
- 2.23 Ref 4.6.1.5: As previous...re Design Champion – lack of independence. Reference to Detailed Design should read Landscape Proposals. If Detailed Design assumes proposals are accepted, they are not yet agreed.
- 2.24 Ref 5.1.1.3: Disagreed-there has been very little update to demonstrate commitments.
- 2.25 Ref 5.1.2.12: For both Morgan and Morecambe Substations: These changes were all made in first 12 months, no further changes made over last 6 months, despite so much effort and constant repetition of concerns and issues.
- 2.26 Ref 5.2.1: See notes above re: Green Belt location. Also ref above on Horlock Rules from NPS EN5 as above.
- 2.27 Ref 5.2.1.14: Re Morgan: This does however create greater effects on the A583. Furthermore very few (if any if closed??) will use the Bridleway (not PRoW) which passes Morgan whilst construction is underway. It would be too unpleasant, with noise, lack of tranquillity, lack of views and reduction in openness). Why were other non Green Belt sites beyond 8km not considered?
- 2.28 Ref 5.3.2.1 Nothing stated??
- 2.29 Ref 5.3.4.7: The 3D images presented do little to allow a proper assessment. If the Viewpoint Visualisations were based on these, it does question the accuracy of the Viewpoint Visualisations- but again indicative? The Applicant has previously noted that the Viewpoints are accurate.
- 2.30 Ref 5.3.5.3: Use of 'may be' again does not offer any guarantee.

- 2.31 Ref 5.3.6.2: Document states that cut and fill is indicative, this therefore confirms that Visualisations are based on indicative and not potentially the worst case scenario, as stated.

The larger of the cross sections (at end of document) gives some indication of proposed cut, but not of proposed fill and how this could help supplement screening. Again supplemented with off site planting this could be much more effective in screening the very large scale Substations. Given the Applicants use of indicative there is no confidence that what proposed would be actual.

- 2.32 Ref 5.3.7.1: Whilst it is understood that the Substation 'platforms' need to be functional- there is no reason why lighter colours could not be avoided- darker colours help visually recede into the landscape, particularly during winter months- some wording as to this effect could easily be accommodated.

- 2.33 Ref 5.3.8.1: This statement demonstrates that the Applicant has no intention to think 'outside the box' to provide 'Good Design', which not only responds to function, but to its aesthetic setting in Green belt areas, where its rural and landscape setting should have due importance.

- 2.34 Ref 5.3.9.1: Should include reference to input from stakeholders...to demonstrate its commitment to 'People'.

- 2.35 Ref 5.3.10.1: Whilst it is understood that fencing must be functional- at 3m height and of an industrial appearance as much fencing as possible needs to be screened from view, particularly during winter periods. The type of fencing/ barrier should be explored. The location of the fence could be at reduced level, not fill level etc.

- 2.36 Ref 5.3.12.1 2<sup>nd</sup> Bullet and 5.3.12.4: The Applicant still needs to justify why permanent access needs to be the width of circa a 3 lane motorway, at 15m? The landscape effects of this are not sufficiently recognised within the Landscape Strategy/ Proposals or Landscape and Visual Effects. It is distinctly out of character with the surrounding landscape and rural character. Any traffic to the site would be required to travel on the usual A-Road width, therefore why is this not sufficient?

Equally there are other means of strengthening an adjacent turf surface to ensure it can tolerate occasional heavy weights?

- 2.37 Ref 5.3.13.2: use of 'where practicable' offers no guarantee or assurance.

- 2.38 Ref 5.3.13.3: Both sites are pasture not arable at present? Incorrect.

- 2.39 Ref 5.3.13.4: Scrub planting is not local to character and more importantly offers little screening of the large scale presented by the Substations. It presents anomalies of scale when viewing 1-2m scrub height against a 15m high built backdrop.

- 2.40 Ref 5.3.13.5-7: Planting could not be described as 'woodland' other than possibly east of the Morgan Substation. Elsewhere it is native structure planting, but not of sufficient depth to annotate as woodland.

Notably the proliferation of wide areas of cable runs at ingress/ egress to substations prevents large areas of tree planting, which would otherwise help screen. It has been suggested that cables buried at additionally deep reduced levels (as a result of cut) could

provide sufficient depths on which to plant (alongside other measures such as root protection membranes). No further comments have been received from the Applicant on this proposal/ suggestion.

There is no recognition or acknowledgement of limitations of planting, on which elevations as result of above and in particular current limitations directly adjacent to the Bridleway.

2.41 Ref 5.3.13.9: gradients of soil deposition should generally not exceed 1:3 slopes, unless agreed. Sufficient space should be ensured to achieve proposed heights of mounding at these gradients.

2.42 Ref 5.3.13.10: Applicant to qualify. If materials are permeable how can the external areas be impermeable?

2.43 Ref 3.3.13.11: This statement is not detailed or quantified therefore it cannot be assessed or justified.

2.44 Ref Figures 20 & 21: previous comments referring to Landscape Strategy apply. There has been no change or update to these drawings in > 6 month period (several updates to documents), despite the Applicants claim that considerations have been taken into account. The Drawings are not currently accepted.

2.45 Ref Figure 22 & 23: The topography doesn't annotate a sufficiently wide enough area and is not annotated sufficiently. E.g. It does not demonstrate that areas north of Morgan are at higher levels (residential properties along Manor Drive and the A583)

It isn't the usual manner of depicting topographical detail, which should be easily legible e.g. to the average lay person, this is usually done by a hierarchy of colour, easily recognising more steep/ flat areas. Is this deliberate or unprofessional?

2.46 Ref Figures 24 & 25: Almost pointless representations as cannot assess Substation layouts. Does not include restoration of ponds as required, or positioning of attenuation features or addressing Bridleway potential diversion, off site planting requirements or access road concerns.

2.47 Figure 26: First time viewed, possibly useful to cross reference previously. Totally illegible at this scale.

2.48 Figures 27-31: The Baseline present s very little information and again isn't the usual manner in depicting baseline condition, verges on the unprofessional. Samme comments as above on topography. Comments regarding landscape as above and previous apply. No changes/ updates over last 6 month period.

2.49 Ref 5.5.1.1 & 5.6.1.1: Incomplete?

2.50 Table 5.1: Assess against previous comments. Read alongside.

CL4: Reinstatement of ponds to help sustainability and climate mitigation-helps drain agricultural areas.

PE1: Unproven

PE2: Not as yet sufficient

PE2.1: No delivery acknowledged

Add : PE2.2: To include off site planting to improve visual and landscape mitigation and reduction of visual effects for residents, business and bridleway and PRow users.

Add PE2.3: To agree Stages of Works with residents/ users, locals and to agree and amend to demonstrate flexible and Good Design.

PE3: Does not demonstrate how takes into account LCC Landscape concerns.

PL1: Reinstate & Strengthen Landscape Framework: Needs to include restoration of ponds and off site planting; Delivery to be by further Commitments.

PL3.1: Fencing would never be used to screen as not visual in own right. Reduced and retained levels, mounding, possibly screen walling (using stone) as well as planting to screen.

PL3.4: Doesn't achieve this at present, needs to include for off site planting- delivery by Commitments.

VA1: Include off-site planting

VA2: Agree sign off at agreed Work Stages (LI Stages of Work) prior to moving to next stage. Demonstrate and ensure Design Champion is independent and unbiased- Preferably in association with a Design Review Process, which is made up from independent professional disciplines.

2.51 Ref 6.1.1.1: Design is not Detailed Design-read as Design Proposals.

2.52 Ref 6.1.1.4-5: A Design Review Board/ Panel is required to make independent- they should sign off each work stage in accordance with JCLI/ RIBA Work Stages. Strongly disagree with requirement for no Design Review Panel.

2.53 Table 6.1: Bias in favour of Applicant. Needs to be more inclusive of stakeholders generally. Hasn't established and agreed Design Principles and Codes.

2.54 Ref 6.2.2: Not yet considered as Detailed Design. Should include all stakeholders.

2.55 Ref 6.2.4.1: Needs to be genuine not a tick box-Design Review panel to sign off Work Stages as well as LPA.

2.56 Table 6.2 Design Codes: Read in Conjunction with previous comments.

DC1: 'Where cost effective and efficient to do so' Not sufficient guarantee that issues will be addressed. Be more specific, not just equipment (as limited) and layout. Doesn't guarantee anything. Should list elements to be considered specifically within the Design Code- for both Landscape and Visual Effects, inclusive of off site planting.

DC3: Include all stakeholders. Note to include Landscape Proposals.

DC5: Include Support for an independent Design Review Panel.

DC6: To date interpretation of NPS's and Good Design is Applicant bias, reflects overwhelming commercial and energy requirements at expense of Good Design relevant to Landscape and Visual Effects. Could be better. Include Design Review Panel input.

DC7: 'As far as Possible' No guarantee what would be achieved. Open to Applicant interpretation.

DC8: Maximise: This wouldn't be achieved without off-site planting. Particular benefit to 'People' and 'Places'.

DC9: 'Explore the Opportunity'...this doesn't guarantee anything.

DC10: Greater extent of Native Structure Planting is required to screen effectively and sufficiently.

2.57 Appendix A Plates 1-4: Clearly demonstrates the scale and anomaly of character the Substations would effect in the rural and Green Belt area. Demonstrates harsh use of colours and materials, form which contract with rural appearance and create urban appearance.

2.58 Cross-Sections: The use of horizontal scale underplays the Landscape Effects as places undue emphasis on distance, beneficial to Applicant viewpoint.

Section A-A incorrectly illustrates that trees (from species proposed) can reach heights of 20m+ on receding slopes.

Choice of cross-section avoids demonstrating the proximity of the two farms closest to Morgan Substation and does not annotate the Bridleway. Freckleton Pool?

Section C-C demonstrates how the attenuation feature prevents further mounding, which would be of significant additional benefit in screening (further 2m in height). Rather move the attenuation feature off-site. Latter maintains openness.

Section B-BB better scale, people appear overly out of scale at 1:500 scale? Be useful to know how far the Substation could be lowered without affecting the water table and how mounding east of the substation could supplement screening to help make screening more effective. This hasn't been explored or demonstrated.

Fencing immediately adjacent to Dow Brook will gather clutter from washed down materials and cause its own localised flooding. Rather position the fencing further back into the woodland to screen, preserve characyer and to allow a repositioned Bridleway to experience continued tranquil and attractive views eastwards.

Section doesn't illustrate grassed areas as proposed (would reduce woodland area as illustrated).

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



**Appendix B - LCC LLFA Comments on the Landscape and Visual Resources section of the Morgan And Morecambe Offshore Wind Farms: Transmission Assets Lancashire County Council SOCG, Document Ref. S\_D1\_6.1/F03 (REP4-079).**

**Ref: Planning Inspectorate No: EN020032**

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

**DEADLINE 6 - RESPONSE TO LANDSCAPE MATTERS;  
relating to Comments on Landscape and Visual elements of LCC  
SoCG F03 (Draft as received 14.10.25 from Applicants for F04), by  
LCC Landscape Architect**

Planning Officer: Jonathan Haine

**LANDSCAPE COMMENTS**

Date: 15.10.25

- 1.0 Introduction
- 1.1 As noted above as a Draft of F03, intended to be F04 it is misleading and confusing not to have issued as F04 Draft.
- 1.2 Difficult to populate at such short notice, but as this is the Applicants wording it is in 90% cases found to be bias towards the Applicant. LCC is only in a position due to time constraints to request tweaking. LCC Landscape comment is therefore not generated by LCC.
- 1.2 Many of the categories documented are found to be issues which are not controversial, i.e. Methodology rather than Design Solutions. It would be more constructive if the actual issues were detailed, listed and easily cross referenced accurately. The Applicants fail to acknowledge the considerable number of responses, with suggestions and recommendations from LCC Landscape, in addition to that submitted in response to ExA questions and responses.
- 1.3 This submission aims to aid the Applicant turn 90% of previously identified yellow to green, in accordance with the Examiner's request at ISH4 to have categories primarily Green or Red. It is noted that on Draft F04 the Applicant has basically turned 75% of previous yellow into Green with only 25% remaining as Red or Yellow. This is without acknowledging previous comments from LCC sufficiently and changing categories as noted in 1.2 above.
- 1.4 Marked Blue below is how LCC Landscape wish comments to be addressed. In yellow highlighted is to be omitted. It is clarified
- 2.0 Comments
- 2.1 With Regards to the Agreements log request for Applicant to remove anything which is not relevant to Landscape e.g. transport/ Ecology/ Flood Risk etc. This should also be applied to any pre application and post application consultation not relevant to landscape issues.
- 2.2 Table 1.1: It is requested that Landscape and Visual is marked as Red. N.B. Green Belt should also be marked as Red.
- 2.3 LCC.LVR.1: Add to LCC position: [The Council agree that the Applicants have had preliminary discussions 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. Limited constructive discussions have taken place to resolve ongoing concerns over the last 6 month period.

Once the text above has been added move from a Red category to a Green category. If not added mark as Red.

- 2.4 LCC.LVR.2: 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 prior to the DCO application, but very little post application. LCC has expressed concern with regards to how few comments have been constructively addressed over the latter 6 month period.

If the above is added can be green, if not the category should be marked as Red. Category response still to be amended.

- 2.5 LCC.LVR.3: LCC position: The Council disagree that the Applicants have addressed all legislation, policies, and guidance that pertains to landscape and visual resources and the assessment of potential impacts, particularly with regards to NPS's and LCA assessments.

If changed can stay as Green category, otherwise mark as red and still add above text.

- 2.6 LCC.LVR.4: LCC position: The Council notes that the representative viewpoints used in the LVIA cannot without further funding and a more relaxed timescale be checked. There are further Viewpoints that would be useful, particularly if 'Moderate' scoring is included within the assessment, as suggested might be relevant by the Examiner. It is not unusual within an Assessment process to include further or reassessment of Viewpoints on request, and usually this is forthcoming without much issue. The Applicant has however been reluctant. Equally some of the Viewpoints were noted as lacking and updates have proven difficult to achieve.
- The Council disagrees that the representative viewpoints used in the LVIA align with best practice guidance. They do not reflect ongoing consultation with the EWG.

Retain as Red category

- 2.7 LCC.LVR.5 LCC position: The Council disagree that the Applicants included relevant and current studies and datasets to inform the LVIA's baseline study as presented to LCC, which informed the subsequent assessment of effects. It has proven a repeated struggle to achieve basic information, it is not presented in a professional manner and is still lacking in some detail and legibility for the average non professional to be able to interpret.

It is suggested that this becomes an Orange category.

- 2.8 LCC.LVR.6 LCC position: The Council disagree that the Applicants have fully complied with guidance provide in PINS Advice Note Nine: Rochdale Envelope; 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 Applicants accept that in some instances their applications are 'indicative' therefore cannot be considered a worst-case scenario. Equally With relation to 2.7 above and as Advice Note 9 on The Rochdale Envelope states "This does not give developers an excuse to provide inadequate descriptions of their projects". It is considered that the Applicants continue with this, the latter approach.

From Advice Note 9:

- *the clearly defined parameters established for the Proposed Development must be sufficiently detailed to enable a proper assessment of the likely significant environmental*

*effects and to allow for the identification of necessary mitigation, if necessary within a range of possibilities;*

It is considered that it has taken so long to achieve a basic Baseline Assessment, that this has delayed and reduced the Councils ability to agree and develop agreed Landscape Proposals with the Applicant at this point in time.

As a result this category needs to be marked as Red.

- 2.9 LCC.LVR.7: LCC Council position: From the first paragraph remove 'all', replace with 'most'. Then:

The Council 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. In particular this includes; effects at Landfall especially during the construction period, which as understood could be over a protracted period, to what is a very well used and attractive aspect of the local areas recreational and associated commercial enterprises; landscape effects on ponds which are characteristic of general rural areas within this particular area of Fylde. These should be restored; Certain properties are not noted for inclusion regarding visual effects, namely from Manor Drive, PRow south of Morecambe Substation and Caravan and Camping businesses within close proximity, whose business depends on an attractive visual outlook.

This category to be marked as Red.

- 2.10 LCC.LVR.8: LCC position: The Council disagrees that the Applicants have provided a reasonable outline of the likely future baseline conditions in the absence of the Transmission Assets. The Council considers that the Substation effects and effects on Landscape Character have not sufficiently been recognised or mitigated. The Council considers that the Applicant could affect further mitigation to significantly improve the future baseline in most instances at little cost. This has not been constructively addressed or acknowledged by the Applicant and therefore remains a disagreement.

This category to be marked as Red.

- 2.11 LCC.LVR.9: LCC position:

The Council agrees that the Applicants have adhered to the scope of the ES that was developed, and agreed to, during initial 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. The Council considers the Applicant has been inflexible in developing, progressing and addressing issues raised from initial assessment.

If the blue wording above is added the category can appear green.

- 2.12 LCC.LVR.10: ??

- 2.13 LCC.LVR.11: The Applicants Position: This fails to add the requirement from the Examiner at ISH2, that Moderate effects may be of consideration in helping to make a decision. Documents and wording does not acknowledge this change and document accordingly.

LCC position: The Council considers that Moderate effects should be more clearly detailed as an Annex to the main document, to enable a better assessment, as a natural progression of the project development.

Mark as Orange.

- 2.14 LCC.LVR.12: LCC position:

The Council disagrees 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 Local Impact Report (REP1-085) – see REP1-086 7.122 of Applicants' Response to Lancashire County Council Local Impact Report (REP2-039). The Council considers that the Applicant refuses to acknowledge that Methodology was contradictory within their

documentation. The Council considers it is usual to provide two ZTV's of both scenarios, for good practice. Notwithstanding the Council considers the night-time scenario should have been considered as separate headings within each element, as is usual within LVIA and that the lighting scenario has therefore been underplayed. The Council considers there is no information provided by the Applicant which sufficiently details the extent of night-time effects.

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. This to be removed.

Mark as Orange.

- 2.15 LCC.LVR.13: LCC position: The Council disagrees that the Applicants have identified, described and assessed the maximum design scenario in the EIA for all relevant landscape and visual resources potentially affected by the Transmission Assets. Those outstanding include ponds from field areas which are not proposed for replacement, but which fundamentally form part of the intrinsic Landscape Character. The ridge-lines on which the Substations are proposed. Sufficient weighting has not been afforded to viewers from Manor Drive, from users of the Bridleway in proximity of the Morgan and Morecambe Substations, PRoW's south of the Morecambe Substation and local businesses' relying on the rural outlook (Caravan and Camping Parks).

Add the blue and mark as Red. It would be considered yellow, except that the Applicant has had considerable time to acknowledge the above comments without acknowledgement and therefore the category needs to be marked as Red.

- 2.16 LCC.LVR.14: LCC position: The Council disagrees that the sensitivity criteria for landscape and visual resources have been correctly identified and sufficiently described in ES Chapter 10 (APP-123)

Where the Council has raised differences these should be acknowledged and stated.

Mark as Orange.

- 2.17 LCC.LVR.15. LCC position: The Council agrees in general, 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. The Council states however, that the Cumulative Effects, ZTV's and night-time areas of the LVIA are weak, that baseline representations are poor, has been and remains insufficient, that there is a lack of honesty, underplaying of landscape character and use of language to mislead the reader and lack of commitment towards effective mitigation. There is insufficient acknowledgement of NCA (National Character Area) guidance on character .

Mark as Orange.

- 2.18 LCC.LVR.16. LCC position: As 2.16 and LCC.LVR.14 LCC position above.

Mark as Orange

- 2.19 LCC.LVR.17 LCC position:

The Council agrees that generally the significance of effects upon landscape and visual resources has been correctly determined and sufficiently described in ES Chapter 10 (APP-123).

The Council has no confidence (demonstrated by the reluctance to change or amend the stance by the Applicant over the last 6 months +) in either SoCG discussions and their written submissions or documentation. Furthermore following ExA request during ISH2, that sub-EIA-significance-threshold effects are not automatically disregarded and have informed decisions on design, mitigation, and overall scheme evaluation, the Council remains concerned that these as well as other constantly repeated landscape and visual effects are not being addressed sufficiently.

Mark as Red

2.20 LCC.LVR.18. LCC position:

The Council disagrees that the assumptions and limitations of ES Chapter 10 (APP-123) are fair and reasonable. The Council considers that the points and issues raised over the previous 6 months plus have not been addressed.

Mark as Red

2.21 LCC.LVR.19. LCC position:

The Council disagrees that the Applicants have adequately screened into the CEA all relevant projects. The Applicant fails to recognise CEA effects of the two Substations from along the Bridleway and PRow's and those effects alongside the Blue Field Solar Farm.

Add above in Blue. Mark as yellow.

2.22 LCC.LVR.20. LCC position:

The Council disagrees that the assessment methodology for the CEA has been undertaken in accordance with best practice guidance. The Council considers insufficient weighting and documentation as recommended in GVLI3 and as noted for LCC.LVR.19.

Mark as Orange.

2.23 LCC.LVR.21. LCC position:

The Council disagrees that the Applicants have 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.

The Council considers that as the timelines for CEA of both the two Substations and the Bluefield Solar Farm are unknown, it is difficult to represent other than indicative assessment. Notwithstanding the Council does not consider the Applicant has considered a worst-case scenario, either at construction or at completion and has not mitigated sufficiently as a result.

Mark as Red

2.24 LCC.LVR.22.LCC position

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 construction phase on the landscape and visual receptors.

The phrase 'short-term' should be removed and is objected to in the Applicants position, as short term is considered incorrect for a development, which could take place for 8 years +

It is unclear to what the word 'listed' applies, therefore remove.

It is strongly disagreed visual receptors would not incur significant visual effects over the potential construction period, especially in a worst-case scenario.

The Applicant needs to be clearer to which part of the development is being referred, the cable route and/ or the Substation area. This needs separating out.

Mark as Yellow.

2.25 LCC.LVR.23.LCC position.

The Council strongly disagrees that the Applicants have assessed the potential residual effects of the Transmission Assets, including sufficient impacts on relevant landscape and visual resources during both day and night, and across construction, decommissioning, operation, and maintenance phases. The Council has significant concern that many residual landscape and visual effects could be better and sufficiently addressed by further relatively straightforward

and non onerous mitigation, that this has been communicated to the Applicant over the last 6 month period, but has not been addressed. There is therefore ongoing concern that the Applicant will not address these concerns post consent.

There is concern in this process whereby comments are repeatedly communicated back to the Applicant, whilst the Examiner in most cases does not see and is not aware of this constant attempt at dialogue and constructive recommendations, the lack of acknowledgement and addressing of concerns.

Mark as Red.

2.26 LCC.LVR.24. LCC position:

The Council disagrees that the Applicants have identified the significant effects (in EIA terms) arising from the construction phase of the Transmission Assets on the listed landscape and visual receptors.

Objection to the use of the words short-term, state this in LCC response and also remove from text.

The Applicant to include significant effects to Freshfield Farm and Green Bank Farm.

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. Also in Council responses to Applicants on submission documents over this period.

The Applicant should specifically set out the effects on Landscape Character, particularly in the Substation areas and not over generalise. These include;

Loss to Openness and Views

Loss to rural character, field pattern, trees and ponds

Loss of tranquillity

Loss of Recreational Assets for wellbeing and health

Mark as Red- due to fact commented upon several times and has not been changed or addressed.

2.27 LCC.LVR.25: LCC position:

The Council disagrees with judgments presented by the Applicants in their assessment of effects. Conclusions, as detailed in the *Local Impact Report* (REP1-085) and the response to ExQ1 (REP3-084) and ExQ2. The Council's judgments are set out below and should be considered alongside any response to the Applicant over the previous 6 month + period.

Landscape Character

LCA 15d: Coastal Plain – Fylde – Major Adverse (significant) at Year 1 and 15.

Visual Receptors

Viewpoint 1 bridleway BW0505016 – Major Adverse (significant) at Year 1 and 15.

Viewpoint 2 Strike Lane – Major Adverse (significant) at Year 1 and 15; if the view was relocated to the end of Strike Lane, as proposed in REP1-085 and REP3-084.

Viewpoint 3 bridleway BW0505016 – Major Adverse (significant) at Year 1 and 15.

Viewpoint 4 Parrox Lane – Moderate adverse (not significant) at Year 1 and 15.

Viewpoint 5 footpath FP0509005 – Moderate adverse (not significant) at Year 1 and 15.

Viewpoint 7 Kirkham Bypass – Moderate adverse (not significant) at Year 1 and 15.

Viewpoint 12 bridleway BW0505016 – Major Adverse (significant) at Year 1 and 15; where users of the bridleway are closest to Morgan substation.

It is considered insufficient to refer solely to Viewpoints and not to general effects.

These would include;

Loss of Openness and Views, particularly to Green Belt areas in which Substation areas are proposed.



Loss to rural and landscape character, field pattern and particularly ponds (which should be restored in character with the existing landscape).

Loss of tranquillity, particularly on PRoW's and Bridleway in vicinity of the Substations.

Views of Scale and Form of industrial style built form and associated paraphernalia, out of landscape character with openness, views characteristic of the Green Belt and rural agricultural area.

Associated urban elements introduced to the rural area, such as 3m industrial style fencing and an access road at a significantly larger scale than the local A roads.

Mark as Red, as the Applicant has had significant amounts of time to address these concerns.

Also have omitted words from statement above.

## 2.28 LCC.OMLP1: LCC position

The Council disagrees with the Applicants' position, considering the proposed mitigation and monitoring measures to be insufficient for addressing potential environmental effects from the onshore substations.

The ongoing engagement programme on the outline Design Principles (APP-209) document and related documents is intended to resolve this disagreement. Remove

The Council has little confidence that the Applicant will address landscape and visual concerns post consent, as these have been raised over the last 6 months+ in responses to the Applicant and not as much as acknowledged by the Applicant, other than in conversations, which are not documented. There have been no changes by the Applicants to Documents and Drawings.

The Council considers that further off site mitigation measures are required to help reduce landscape and visual effects. These include planting up hedgerows which currently exist as post and wire, or are gapped, planting of rough open areas adjacent to Manor Drive to reduce direct visual effects on the Morgan Substation and particularly the new access area (an option for advanced planting with quick growing species..could be considered and agreed) and planting which actually replicates landscape character, rather than emphasises the alien built form.

Equally measures being 'indicative' regarding cut and fill and current performance, again offer little guarantee and confidence that these measures would be undertaken to improve the visual outlook of the Substations.

The finer detail such as species is not an issue, it is generally the fundamental design issues and concepts which are not yet resolved.

Due to lack of confidence in Applicant mark as Red.

## 2.29 LCC.OMLP ": LCC position

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 Council does not consider that these issues would be resolved at post consent as the Applicant continues to present one outlook only and not reflect or constructively take on board issues raised over the last 6 months = by the Council. The ongoing engagement programme on the Outline Design Principles and related documents aims to resolve this disagreement Remove.

The Council reiterates that the substations would significantly affect the surrounding landscape character, impacting openness and visual elements of the Green Belt, rural and agricultural field areas demarcated by hedgerows and its tranquillity. This would be replaced with a stark built form of a scale and presence strongly out of character, introducing large scale urban elements, which weaken the appearance and purpose as a Green Belt area. Pond restoration and replacement should be in character with the existing landscape, i.e. frequent and scattered within field areas as currently exists. Visual effects would continue to impact residents, businesses, visitors, recreational users and could be further mitigated.



Mark as Red, due to lack of confidence in Applicant intention. Colours above confused as Applicant changes colour usage in their document. Can determine what LCC require from what documented.

2.30 LCC.OLMP 3. Outline Design Principles. LCC position.

In its response to the Examining Authority's written question ExQ 13.1.5 (REP3-082), the Council states that:

"...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."

The comments above refer to an iteration prior to OLMP3, current ODP(14.10.25 response to Applicant).

The Council has however strong disagreement with the current ODP and consider the document bias and unrepresentative of the concerns LCC has raised over the last 6 month + period. As such it cannot be accepted and presents real concerns that landscape and visual issues would be addressed post consent.

The Council considers that as the area is highly valued and has purpose as Green Belt the Applicants efforts should be more than 'adequate' as stated in their position.

Accordingly, the Council presently agrees / disagrees with the Applicants' position, considering that the Design Principles and Design Coding will set out in the Outline Design Principles document (APP-209) to provide sufficient design governance for the discharge of requirements post-consent.

The ongoing engagement programme on the *outline Design Principles* (APP-209) document and related documents is intended to resolve this disagreement. REMOVE

Mark as Red, primarily due to lack of confidence in the Applicant to engage constructively.

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



# MORGAN AND MORECAMBE OFFSHORE WIND FARMS: TRANSMISSION ASSETS

Lancashire County Council SoCG



Deadline: Deadline **64**  
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**8 August 2025 21 October 2025**  
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**Prepared by:**

**Morgan Offshore Wind Limited,  
Morecambe Offshore Windfarm Ltd**

**Prepared for:**

**Morgan Offshore Wind Limited,  
Morecambe Offshore Windfarm Ltd**

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Signatories	
Signed	
Name	
Date	
Position	
For	Lancashire County Council
Signed	
Name	
Date	
Position	
For	Morgan OWL
Signed	
Name	
Date	
Position	
For	Morecambe OWL

## Glossary

Term	Meaning

## Acronyms

Acronym	Meaning
CoCP	Code of Construction Practice
DCO	Development Consent Order
EnBW	Energie Baden-Württemberg AG
FRA	Flood Risk Assessment
LCC	Lancashire County Council
MLWS	Mean Low Water Springs
PRoW	Public Rights of Way
SoCG	Statement of Common Ground

# **1 Initial Statement of Common Ground between Morgan and Morecambe Offshore Wind Farms: Transmission Assets and Lancashire County 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 Lancashire County Council 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 Lancashire County Council 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 Lancashire County Council's remit**

1.1.2.1 The Lancashire County Council is the county planning authority, the highways authority, and the lead local flood authority for the area in which the Transmission Assets are located. The County Council also has a statutory remit with regard to Public Rights of Way.

1.1.2.2 The elements of the Transmission Assets which may affect the interests of Lancashire County Council are within Work Number 4A, 4B to 54A,54B landward to Mean Low Water Springs (MLWS). These are detailed in Schedule 1 (Authorised Project), Part 1 (Authorised Development) of the Draft DCO (AS-004).

1.1.2.3 This SoCG covers the following topics of relevance to Lancashire County Council:

- Hydrology and Flood Risk;
- Onshore Ecology and Nature Conservation;
- Green Belt and Area of Separation;



- Landscape and Visual Resources
- Land Use and Recreation;
- Historic Environment
- Traffic and Transport
- 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 Lancashire County Council within its response to [insert e.g. Scoping, Section 42 consultation and as raised through the [insert EWG if applicable] that has underpinned the pre-application consultation between the parties. This SoCG also includes those issues raised by Lancashire County Council 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 log.

## 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 (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
Hydrology and Flood Risk	Ongoing point of discussion
Onshore Ecology and Nature Conservation	Ongoing point of discussion

Topic	Agreement status
Green Belt and Separation	Ongoing point of discussion
Landscape and Visual Resources	Ongoing point of discussion
Land Use and Recreation	Ongoing point of discussion
Historic Environment	Ongoing point of discussion
Traffic and Transport	Ongoing point of discussion
DCO	Ongoing point of discussion

## 1.3 Summary of Consultation

1.3.1.1 Table 1.2 provides below provides a summary of the consultation undertaken by the Applicants with Lancashire County Council during the pre-application phases of the Transmissions Assets. Table 1.3 below provides a summary of the consultation undertaken by the Applicants with Lancashire County Council during the post-application phases of the Transmission Assets.

**Table 1.2: Summary of pre-application consultation with Lancashire County Council**

Date	Form of consultation	Statutory or non-statutory engagement	Summary of consultation
<b>Evidence Plan Process, Historic Environment EWG</b>			
18 January 2023	EWG01	Non-statutory engagement	Matters discussed include study area buffer agreement of 500m, geoarchaeological deposit modelling with topographical surveys. LCC representative agreed with general approach proposed in the meeting.
9 August 2023	EWG02	Non-statutory engagement	Consultees agreed with the proposed approach to agreeing trial trenching, which will be agreed in sections and geophysical surveys are progressed. LCC rep to share survey work for a nearby solar farm.
8 February 2024	EWG03	Non-statutory engagement	Matters discussed include redrafting the DBA, survey coverage, PEIR data release and the onshore WSI. Specification no longer required for the DBA.
<b>Evidence Plan Process, Traffic and Transport EWG</b>			
16 March 2023	EWG01	Non-statutory engagement	Data, models and figures to be provided for methodology. Matters discussed include reviewing existing modelling, info

Date	Form of consultation	Statutory or non-statutory engagement	Summary of consultation
			requests for access track locations. LCC to provide further comments on scoping report.
12 September 2023	EWG02	Non-statutory engagement	Matters discussed include- LCC to provide modelling reports, agreement of PEIR approach, and liaising with Blackpool Council regarding the updated study area and RLB.
15 August 2024	EWG03	Non-statutory engagement	<p>Site-selection updates, highlighting key changes in the Transmission Assets Order Limits; updates in the assessment baseline and the identification of new road schemes since the submission of PEIR and statutory consultation; transport EIA updates in line with the evolution of the project. LCC questioned if the approach and background information will be shared with the local authorities to check they agree with the methodology, highlighted the importance of presenting sufficient information to allow the highway authorities to come up with a conclusion on whether highways impacts can be accommodated. As well as the influence of seasonal traffic e.g. during the summer and for the Blackpool illuminations. LCC wanted sufficient information within the CTMP to allow the approach to be investigated.</p> <p>The highways authorities want to work collaboratively with the applicant</p> <p>LCC queried what restrictions will be in place for construction traffic, especially around sensitive areas.</p>
<b>Evidence Plan Process, Hydrology and Flood Risk EWG</b>			
3 May 2023	EWG01	Non-statutory engagement	Matters discussed include accessing and sharing data for the FRA, confirming metrics to be used in calculations.

Date	Form of consultation	Statutory or non-statutory engagement	Summary of consultation
10 August 2023	EWG02	Non-statutory engagement	Matters discussed include requesting missing map data from council, reviewing possibility of sending out RLB and borehole data, and climate data allowance update.
21 November 2023	Section 42 Statutory Consultation Response	Statutory engagement	<p>LCC identified the need for the following information:</p> <ul style="list-style-type: none"> <li>• Lifetime maintenance and management of the project</li> <li>• Disruption prevention measures</li> <li>• Surface water flood risk</li> <li>• Impacts on ordinary water courses</li> <li>• Demonstration of legislative compliance</li> <li>• Demonstration of ecological impact avoidance</li> <li>• Impact on designated sites</li> </ul> <p>Other concerns include the scope of ecological assessments, potential working hours and biodiversity net gain.</p>
30 January 2024	EWG03	Non-statutory engagement	Matters discussed include the technical note on climate change datasets and models to be produced, mapping queries and joint SFRA feedback.
<b>Evidence Plan Process, Onshore Ecology (including Onshore and Intertidal Ornithology) EWG</b>			
23 March 2023	EWG01	Non-statutory engagement	<ul style="list-style-type: none"> <li>• The proposed scope of the onshore ecology (and onshore and intertidal ornithology) surveys in terms of species, survey coverage and methodologies.</li> <li>• The species for which surveys are not proposed</li> </ul>
13 September 2023	EWG02	Non-statutory engagement	Discussion on the approach to BNG taking into account the large area covered by the Order Limits and the limited scale of potential impacts.
18 December 2023	EWG03	Non-statutory engagement	<ul style="list-style-type: none"> <li>• Further discussion on the approach to BNG including the commitment to submit a Biodiversity Benefit Statement</li> </ul>

Date	Form of consultation	Statutory or non-statutory engagement	Summary of consultation
			<ul style="list-style-type: none"> <li>The exclusion of areas from the BNG baseline (e.g. proposed mitigation areas at landfall)</li> </ul>
26 January 2024	EWG04	Non-statutory engagement	<ul style="list-style-type: none"> <li>Coverage of ecology surveys was presented during the meeting with further detail provided in a technical note</li> <li>Use of trenchless techniques at crossing locations to avoid or reduce direct and indirect effects on onshore ecology and nature conservation.</li> <li>Information that would be required to demonstrate that the ancillary works would not cause indirect effects to habitats at Lytham St Anne's Dunes and River Ribble crossing.</li> </ul>
31 May 2024	EWG05	Non-statutory engagement	Discussion on the survey coverage at submission
19 June 2024	EWG06	Non-statutory engagement	Discussion on proposed mitigation for onshore ecology and onshore and intertidal ornithology
27 June 2024	EWG07	Non-statutory engagement	Discussion on the survey coverage and the approach to surveys where data gaps exist.
<b>Evidence Plan Process, Land Use and Recreation</b>			
19th September 2024	Meeting regarding Public Rights of Way	Non-statutory engagement	<p>Outline Public Right of Way management proposals. The following key items were presented for agreement;</p> <ul style="list-style-type: none"> <li>The identification of PRoW located within the Onshore Order Limits;</li> <li>and • The outline management measures proposed for each PRoW identified, including requirements for managed crossing and temporary diversion.</li> </ul> <p>Responses received during the EWG were subsequently used to inform relevant sections of this chapter of the ES and supporting documentation.</p>

Date	Form of consultation	Statutory or non-statutory engagement	Summary of consultation
<b>Evidence Plan Process, Landscape and Visual Impacts EWG</b>			
22 February 2024	EWG01	Non-statutory engagement	<ul style="list-style-type: none"> <li>To scope out seascape effects from the assessment in response to a reduction in the offshore element of the Transmission Assets</li> <li>To agree the representative viewpoint locations for the onshore substations and River Ribble crossing head houses</li> <li>To present grey rendered photomontages of the main buildings and infrastructure at the onshore substations for all viewpoint locations.</li> </ul>
24 September 2024	Design Principles and Landscape management meeting	Non-statutory engagement	Matters discussed include outlining design process, landscape strategy update

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

Date	Form of consultation	Statutory or non-statutory engagement	Summary of consultation
19 November 2024	Meeting with Lancashire County Council	Non Statutory	Project Overview including order limits, surveys and programme. Summary of Traffic and Transport impacts and mitigation. Next steps including development of Outline Highways Access Management Plan and Outline Construction Traffic Management Plan.
17 <sup>th</sup> January 2025	Meeting with Lancashire County Council as Lead Local Flood Authority	Non Statutory	Meeting to discuss protective provisions.
27 January 2025	Relevant Representation	Statutory	Provision of Lancashire County Council's Relevant Representation (RR-1262)
12 <sup>th</sup> March	Meeting with Lancashire County Council as Local Highway Authority	Non Statutory	Discussion on Relevant Representation and key concerns specifically; <ul style="list-style-type: none"> <li>Delivery hours</li> </ul>

Date	Form of consultation	Statutory or non-statutory engagement	Summary of consultation
			<ul style="list-style-type: none"> <li>Highway condition (inc. peat roads)</li> <li>Route geometry</li> <li>Outline access designs</li> <li>Abnormal loads (highway structures)</li> </ul>
7 <sup>th</sup> April	Meeting with Lancashire County Council as Local Highway Authority	Non Statutory	Update on key workstreams in response to matters raised within LCCs relevant representation.

## 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.



## 1.4.2 Landscape and Visual Resources

Table 1.5: Agreement Log between the parties on Landscape and Visual Resources

Reference Number	Discussion point	Applicants' position	Lancashire County Council position	Status
<b>EIA</b>				
LCC.LVR.1	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><u>The Applicants acknowledge the nature of engagement that has taken place since the submission of the DCO application, noting that meaningful dialogue is most effective when all parties approach the process constructively, prepared to exchange perspectives and explore options through the structured engagement opportunities provided, rather than repeating positions set out in previously written representations.</u></p> <p><u>The Applicants have consistently communicated what is achievable within the defined parameters of the Project, as evidenced throughout their submissions to the Examination.</u></p> <p><u>While recognising the fast pace of the Examination, the Applicants wish to state that they have made sustained efforts to facilitate constructive and substantive engagement with the Council. This has included a series of meetings, the submission of information, and the provision of work-in-progress materials between Examination deadlines.</u></p>	<p><b>The Council agree</b> that the Applicants have <u>had preliminary discussions 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.</u></p> <p><u>Limited constructive discussions have however taken place to resolve ongoing concerns over the last 6 month period, 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.</u></p> <p>Unfortunately LCC landscape do not consider that the Applicants have engaged constructively or have acknowledged previous comments and representations and would disagree that options have been explored.</p> <p>Only at one face to face meeting (the recent Expert Witness meeting) on Landscape SoCG were points raised by LCC Landscape acknowledged, but these have neither been documented or actioned upon.</p>	

Reference Number	Discussion point	Applicants' position	Lancashire County Council position	Status
LCC.LVR.2	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 by the Council, the Applicants' responses, and how each matter has been addressed within the ES chapter.</p> <p><u>The Applicants refer to their position at LCC.LVR.1, which acknowledges the fast pace of the Examination and reaffirms their consistent objective of facilitating constructive and substantive engagement with the Council. This proactive approach is evidenced throughout the Examination process, including through a series of targeted meetings, ongoing correspondence, and the submission of work-in-progress materials between Examination deadlines. The Applicants consider that this level of engagement demonstrates a genuine commitment to collaboration.</u></p>	<p><b>The Council agree</b> 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 <u>prior to the DCO application, but very little post application.</u></p> <p><u>LCC has expressed concern with regards to how few comments have been constructively addressed over the latter 6-month period.</u></p> <p>LCC Landscape have found themselves to be constantly on the back foot with regards to presentation of information. Meetings are not constructive when they are a one sided presentation of a document with an expectation to comment immediately.</p> <p>LCC Landscape do not agree that the Applicants have engaged constructively.</p>	
LCC.LVR.3	Policy and planning	<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><u>The Applicants note the Council's views regarding the approach taken to addressing relevant legislation, policies, and guidance within</u></p>	<p><b>The Council disagree</b> that the Applicants have <u>addressed all legislation, policies, and guidance that pertains to landscape and visual resources and the assessment of potential impacts, particularly with regards to NPS's and LCA assessments. agree that the Applicants have addressed all legislation, policies, and guidance within the Council's remit that pertains to landscape and visual resources and the assessment of potential impacts.</u></p>	<p><u>Not agreed</u> Agreed</p>

Reference Number	Discussion point	Applicants' position	Lancashire County Council position	Status
		<u>the Council's remit, as set out in the Council's Written Representations during the Examination. The Applicants maintain that their approach is both compliant with relevant legislation and proportionate to the scope of the Project. This is demonstrated through the evidence and justification provided in their Examination submissions, which confirm that all applicable policy and guidance requirements have been appropriately considered and addressed.</u>		
LCC.LVR.4	Surveys	<p>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 Council, Lancashire County 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.</p> <p><u>The Applicants note that the Council was consulted in February 2024, as part of the EWG at Stakeholder Meeting 1, in relation to several site-specific survey matters. The consultation sought agreement on the following:</u></p> <ul style="list-style-type: none"> <li><u>The representative viewpoints for the onshore substations, as presented in the PEIR,</u></li> </ul>	<p><u>The Council notes that the representative viewpoints used in the LVIA cannot, without further funding and a more relaxed timescale, be checked.</u></p> <p><u>There are further viewpoints that would be useful, particularly if 'Moderate' scoring is included within the assessment, as suggested might be relevant by the Examiner.</u></p> <p><b><u>It is not unusual within an Assessment process to include further or reassessment of Viewpoints on request, and usually this is forthcoming without much issue. The Applicant has however been reluctant. Equally some of the Viewpoints were noted as lacking and updates have proven difficult to achieve.</u></b></p> <p><u>The Council disagree that the representative viewpoints used in the LVIA align with best practice guidance. They do not reflect ongoing consultation with the EWG. The Council was consulted in February 2024, as part of the EWG at Stakeholder Meeting 1, in relation to several site-specific survey matters.</u></p> <p><u>The consultation sought agreement on the following:-</u></p>	<p><u>Not agreed</u> <u>Disagree</u></p>

Reference Number	Discussion point	Applicants' position	Lancashire County Council position	Status
		<p><u>acknowledging that final view orientations may be subject to micro-siting;</u></p> <ul style="list-style-type: none"> <li><u>The representative and candidate viewpoint locations for the River Ribble crossing; and</u></li> <li><u>The presentation of grey-rendered photomontages illustrating the main buildings and associated infrastructure at the onshore substations for all agreed viewpoint locations.</u></li> </ul> <p>Accordingly, no further photography was requested or captured undertaken after February 2024.</p>	<p><del>• The representative viewpoints for the onshore substations, as presented in the PEIR, acknowledging that final view orientations may be subject to micro-siting;</del></p> <p><del>• The representative and candidate viewpoint locations for the River Ribble crossing; and</del></p> <p><del>• The presentation of grey-rendered photomontages illustrating the main buildings and associated infrastructure at the onshore substations for all agreed viewpoint locations.</del></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><b>The Council agrees</b> 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><b>This remains a position of disagreement</b></p>	

Reference Number	Discussion point	Applicants' position	Lancashire County Council position	Status
LCC.LVR.5	Baseline methodology	<p>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.</p> <p><u>The Applicants wish to reiterate that the submissions forming part of the DCO application have been prepared by Chartered practitioners with extensive experience in the delivery of comparable infrastructure projects. These appropriately qualified professionals were appointed to prepare, on behalf of the Applicants, this Chapter of the ES, in accordance with recognised best practice guidance and relevant industry standards.</u></p>	<p><b><u>The Council disagree</u></b> that the Applicants included relevant and current studies and datasets to inform the LVIA's baseline study as presented to LCC, which informed the subsequent assessment of effects.</p> <p><u>It has proven a repeated struggle to achieve basic information; it is not presented in a professional manner and is still lacking in some detail and legibility for the average non-professional to be able to interpret. The aspects which have proven difficult include topography and particularly cross sections and sections. The poor presentation of these documents has been illegible (even to the Examiner's comments-ISH2) and is designed to maximise the Applicants standpoint and has not been an honest representation.</u> <b>The Council agree</b> 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.</p>	<p><u>Not agreed, but not material</u> Agreed</p>

LCC.LVR.6	Baseline methodology	<p>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.</p> <p><u>The Applicant reiterate that the Maximum Design Scenario defines the maximum construction, operational and decommissioning parameters of the Transmission Assets. These onshore construction parameters are secured under Requirement 5 of Schedules 2A and 2B of the draft DCO (document reference C1), which subsequently ensures that the substations cannot exceed the assessed parameters.</u></p> <p><u>This approach allows the assessment of a realistic worst-case scenario while retaining flexibility for detailed design to be informed by ongoing consultation and the design governance process secured in the draft DCO. For a NSIP, the approach outlined above clearly set out the 'fundamentals' of the proposed development and accords with best practice for large scale project of this nature.</u></p> <p><u>The Applicants stand by their approach, additionally referring to the additional information they have submitted during the Examination in support of stakeholders' written representations, requests and queries.</u></p>	<p><u>The Council disagree that the Applicants have fully 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.</u></p> <p><u>The Applicants accept that, in some instances, their applications are 'indicative', therefore cannot be considered a worst-case scenario.</u></p> <p><u>Equally, with relation to LCC.LVR.5 above, and as Advice Note 9 on The Rochdale Envelope states: "This does not give developers an excuse to provide inadequate descriptions of their projects".</u></p> <p><u>It is considered that the Applicants continue with this, the latter approach.</u></p> <p><u>From Advice Note 9: "the clearly defined parameters established for the Proposed Development must be sufficiently detailed to enable a proper assessment of the likely significant environmental effects and to allow for the identification of necessary mitigation, if necessary within a range of possibilities"</u></p> <p><u>It is considered that it has taken so long to achieve a basic Baseline Assessment, that this has delayed and reduced the Councils ability to agree and develop agreed Landscape Proposals with the Applicant at this point in time.</u></p> <p><u>The Council agree that 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.</u></p>	Not agreed
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LCC.LVR.7	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 – which could be affected by the components of the Transmission Assets.	<p><b>The Council agrees</b> that the Applicants have correctly identified and describes <u>all-most</u> relevant landscape and visual resources – regarding landscape character, visual receptors and designated landscapes - which could be affected by the components of the Transmission Assets.</p> <p>The Council 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. <b>This remains a position of disagreement.</b></p> <p><u>In particular, this includes:</u></p> <ul style="list-style-type: none"> <li><u>Effects at Landfall especially during the construction period, which as understood could be over a protracted period, to what is a very well used and attractive aspect of the local areas recreational and associated commercial enterprises; landscape effects on ponds which are characteristic of general rural areas within this particular area of Fylde. These should be restored;</u></li> <li><u>Certain properties are not noted for inclusion regarding visual effects, namely from Manor Drive, PRoW south of Morecambe Substation and Caravan and Camping businesses within close proximity, whose business depends on an attractive visual outlook.</u></li> </ul>	Ongoing point-of discussion Not Agreed
LCC.LVR.8	Future Baseline	<p>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.</p> <p><u>The Applicants reiterate that the Infrastructure Planning (Environmental Impact Assessment)</u></p>	<p><b>The Council disagrees</b> that the Applicants have provided a reasonable outline of the likely future baseline conditions in the absence of the Transmission Assets.</p> <p><u>The Council considers that the Substation effects and effects on Landscape Character</u></p>	Not Agreed

		<p><u>Regulations 2017</u> requires that [emphasis added by the Applicant]:</p> <p><u>“an outline of the likely evolution thereof without implementation of the development as far as natural changes from the baseline scenario can be assessed with reasonable effort on the basis of the availability of environmental information and scientific knowledge”</u> is included within the ES.</p> <p>The Applicants refer to the outline provided in <u>Section 10.7.6 of Volume 3, Chapter 10 Landscape and Visual Resources (APP-123)</u>.</p>	<p>have not sufficiently been recognised or mitigated.</p> <p>The Council considers that the Applicant could affect further mitigation to significantly improve the future baseline in most instances at little cost. This has not been constructively addressed or acknowledged by the Applicant and therefore remains a disagreement.</p>	
LCC.LVR.9	Scope of the Assessment	<p>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.</p>	<p><b>The Council agrees</b> that the Applicants have adhered to the scope of the ES that was developed, and agreed to, <u>during initial</u> 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.</p> <p><u>The Council considers the Applicant has been inflexible in developing, progressing and addressing issues raised from initial assessment.</u></p>	Agreed
LCC.LVR.10	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</p>	<p><u>[The Council have not provided a response to the Applicants' position], 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.</u></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>	No status Agreed



		how these were addressed within the Environmental Statement (ES) chapter		
LCC.LVR.11	Study area	<p>The study areas for each component of the Transmission Assets, determined in Volume 3, Chapter 10 Landscape and Visual Resources (APP-123), capture all potentially significant effects on the landscape and visual resources and designated landscapes.</p> <p><u>The Applicants note that the Council was consulted in 2023 and 2024 on the study areas (amongst other elements of the LVIA) 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.</u></p> <p><u>No formal comments on the study areas were submitted following either the Scoping Report or the PEIR, prior to the submission of the ES by the Council.</u></p>	<p><u>The Council considers that Moderate effects should be more clearly detailed as an updated Annex to the main document, to enable a better assessment, as a natural progression of the project development. This follows questions and comments from the Examiner on the potential Moderate effects which could have bearing on the application decision.</u></p> <p><u>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 ES, following submission of the Scoping Report on 28 October 2022 to the Planning Inspectorate.</u></p> <p><u>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.</u></p> <p><u>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.</u></p>	Not agreed, but not materialAgreed
LCC.LVR.12	Zone of Theoretical Visibility (ZTV) study	<p>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> <p><u>The Applicants note that the Council was consulted in 2023 and 2024 regarding the proposed representative viewpoints, study areas,</u></p>	<p><u>The Council disagree 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 Local Impact Report (REP1-085) – see REP1-086 7.122 of Applicants' Response to Lancashire County Council Local Impact Report (REP2-039).</u></p>	Not agreed, but not material

		<p>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>No formal comments on the study areas were submitted following either the Scoping Report or the PEIR, prior to the submission of the ES by the Council.</p> <p>Furthermore, 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 Local Impact Report (REP1-085) – see REP1-086 7.122 of Applicants' Response to Lancashire County Council Local Impact Report (REP2-039).</p> <p>The Applicants stand by this clarification.</p>	<p>The Council considers that the Applicant refuses to acknowledge that Methodology was contradictory within their documentation.</p> <p>The Council considers it is usual to provide two ZTV's of both scenarios, for good practice.</p> <p>Notwithstanding the Council considers the night-time scenario should have been considered as separate headings within each element, as is usual within LVIA and that the lighting scenario has therefore been underplayed.</p> <p>The Council considers there is no information provided by the Applicant which sufficiently details the extent of night-time effects. 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> <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 Local Impact Report (REP1-085) – see REP1-086 7.122 of Applicants' Response to Lancashire County Council Local Impact Report (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</p>	
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			<del>of receptors taken forward for detailed assessment.</del>	
LCC.LVR.13	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.	<p><del>The Council <b>disagree</b> that the Applicants have identified, described and assessed the maximum design scenario in the EIA for all relevant landscape and visual resources potentially affected by the Transmission Assets.</del></p> <p><del>Those outstanding include ponds from field areas which are not proposed for replacement, but which fundamentally form part of the intrinsic Landscape Character. Also the ridge-lines on which the Substations are proposed are not referenced or detailed alongside the constant request for information on topography.</del></p> <p><del>Sufficient weighting has not been afforded to viewers from Manor Drive, from users of the Bridleway in proximity of the Morgan and Morecambe Substations, PROW's south of the Morecambe Substation and local businesses' relying on the rural outlook (Caravan and Camping Parks).</del></p> <p><del>The Council agrees that the Applicants have identified, described and assessed the maximum design scenario in the EIA for relevant landscape and visual resources potentially affected by the Transmission Assets.</del></p>	Not agreed
LCC.LVR.14	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).	<p><del>The Council disagree that the sensitivity criteria for landscape and visual resources have been correctly identified and sufficiently described in ES Chapter 10 (APP-123).</del></p> <p><del>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).</del></p> <p><del>Where the Council has raised differences these should be acknowledged and stated.</del></p>	Not agreed, but not materialAgreed
LCC.LVR.15		The methodology for assessment of landscape and visual resources has been undertaken in	<del>The Council agree in general, that the methodology for assessment of landscape and</del>	Agreed

	Assessment methodology	<p>accordance with best practice guidance within GLVIA3 (Landscape Institute and IEMA, 2013), drawing upon other best practice guidance, where relevant.</p> <p><u>The Applicants reiterate that the landscape and visual impact assessment was prepared by Chartered landscape architects with extensive experience of delivering LVIA's for similar development and comparable infrastructure projects. These appropriately qualified professionals were appointed to prepare this aspect of the DCO submission, on behalf of the Applicants, in accordance with recognised best practice guidance set out in the GLVIA3 and other relevant industry standards.</u></p>	<p><u>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.</u></p> <p>The Council states however, that the <u>Cumulative Effects, ZTV's and night-time areas</u> of the LVIA are weak, that baseline representations are poor, has been and remains insufficient, that there is a lack of honesty, underplaying of landscape character and use of language to mislead the reader and lack of commitment towards effective mitigation. There is insufficient acknowledgement of NCA (National Character Area) guidance on character. It is noted that The Applicants Landscape Consultant is not independent. 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.</p>	<p>Not agreed, but not material</p>
LCC.LVR.16	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).	<p>As LCC.LVR.14 LCC position above. The Council <del>disagrees</del> that the magnitude of impact criteria for landscape and visual resources <del>have</del><u>has</u> been correctly identified and sufficiently described in ES Chapter 10 (APP-123). Where the Council has raised differences these should be acknowledged and stated.</p>	Not agreed
LCC.LVR.17	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).	The Council agrees that in general the significance of effects upon landscape and visual resources has been correctly determined and sufficiently described in ES Chapter 10 (APP-123).	<p>Ongoing point of discussion</p> <p>Not agreed</p>

		<p>The Applicants consider that the approach of the LVIA to significance, within the context of the wider ES, remains robust and consistent with both the EIA Regulations and accepted industry guidance, namely the GLVIA3.</p> <p>GLVIA3 does not prescribe the exact threshold at which point a landscape or visual effect becomes significant, but it does require a transparent process to be followed, which considers the sensitivity of receptors, magnitude of impact, and sufficient descriptive text to support the final significance of effect. Furthermore, the threshold of Moderate adverse and below is a typical point at which landscape and visual effects are not considered significant. Paragraph 10.11.4.4 of the LVIA clarifies that effects assessed as being of 'moderate' significance are not automatically treated as EIA significant, but <b>this does not mean they are disregarded. As explicitly stated in the LVIA, such effects are given appropriate weight in the assessment process.</b> This includes informing judgements on scheme design, mitigation, and the balancing of likely effects in the context of decision-making. The risk of "underplaying" effects therefore is explicitly mitigated by the tiered approach adopted within the LVIA and ES, which distinguishes between the significance of effects for EIA purposes and the professional judgements around landscape sensitivity, susceptibility, and value. Moreover, those effects assessed as 'moderate' or approaching the threshold of significance are clearly identified and discussed to ensure transparency and to support a proportionate assessment and evaluation of potential environmental effect.</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, the Council remains concerned that such effects may be overlooked in the final decision-making process.</p> <p>The Council has no confidence (demonstrated by the reluctance to change or amend the stance by the Applicant over the last 6 months +) in either SoCG discussions and their written submissions or documentation.</p> <p>Furthermore, following ExA request during ISH2, that sub-EIA-significance-threshold effects are not automatically disregarded and have informed decisions on design, mitigation, and overall scheme evaluation, the Council remains concerned that these as well as other constantly repeated landscape and visual effects are not being addressed sufficiently.</p> <p>Why not present the Moderate effects , simply stated or attached as requested? It enables easy assessment and gives appropriate weight.</p>	
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LCC.LVR.18	Assessment methodology	The assumptions and limitations of Volume 3, Chapter 10 Landscape and Visual Resources (APP-123) are fair and reasonable.	<b>The Council <del>disagrees</del></b> that the assumptions and limitations of ES Chapter 10 (APP-123) are fair and reasonable. <u>The Council considers that the points and issued raised over the previous 6 months plus have not been addressed.</u>	Not Agreed
LCC.LVR.19	CEA scope	The list of projects screened into the Cumulative Effects Assessment (CEA) in the EIA is appropriate.	<b>The Council <del>disagrees</del></b> that the Applicants have adequately screened into the CEA all relevant projects. <u>The Applicant fails to recognise CEA effects of the two Substations from along the Bridleway and PRow's and those effects alongside the Blue Field Solar Farm.</u>	Not Agreed
LCC.LVR.20	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).	<b>The Council <del>disagrees</del></b> that the assessment methodology for the CEA has been undertaken in accordance with best practice guidance. <u>The Council considers insufficient weighting and documentation, as recommended in GLVIA3, and as noted for LCC.LVR.19.</u>	Not Agreed
LCC.LVR.21	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 resources, during the daytime and night, and during the construction/decommissioning phase and the operation/maintenance phase.	<b>The Council <del>disagrees</del></b> that the Applicants have presented <del>has presented</del> 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. <u>The Council considers that as the timelines for CEA of both the two Substations and the Bluefield Solar Farm are unknown, it is difficult to represent other than indicative assessment. Notwithstanding, the Council does not consider the Applicant has considered a worst-case scenario, either at construction or at completion and has not mitigated sufficiently as a result.</u>	<del>Not</del> Agreed

LCC.LVR.22	CEA	<p><u>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:</u></p> <p><u>Landscape Character</u></p> <p><u>No significant landscape effects are identified as arising from the components of the Transmission Assets in combination with other schemes during the short-term construction phase.</u></p> <p><u>Visual Receptors</u></p> <ul style="list-style-type: none"> <li><u>People using PROWs within 1km of the corridors of the export cable or 400 kV cable that would cross the cable corridor, be in proximity to the temporary construction activities and/or pass nearby CEA developments.</u></li> <li><u>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 – temporary and reversible onshore cable (export cable or 400 kV cable).</u></li> </ul> <p><u>* The Applicants note that it is likely that construction activities would be undertaken in short-term stages along the onshore export and 400 kV grid connection cable corridors rather than continuously during the maximum 66-month construction period. People using PROW, with the Transmission Assets making a medium to negligible contribution to cumulative effect.</u></p> <p><u>Occupiers of residential properties, with the Transmission Assets making a medium to negligible contribution to cumulative effect.</u></p>	<p><b>The Council <del>disagrees</del></b> that the Applicants have fairly identified the significant effects (in EIA terms) arising from the Transmission Assets in combination with other schemes during the construction phase on the listed landscape and visual receptors.</p> <p><u>The phrase 'short-term' should be removed and is objected to in the Applicants position, as short term is considered incorrect for a development, which could take place for 8 years +</u></p> <p>It is unknown whether significant landscape effects would be incurred from the Transmission Assets as the timescale for the Bluefield Solar farm it is understood is currently unknown and other potential development projects along the transmission route could arise over an 8 year+ period.</p> <p>Should both Substations being constructed concurrently (unknown) would also compound landscape and visual effects.</p> <p><u>It is <b>strongly disagreed</b> visual receptors would not incur significant visual effects over the potential construction period, especially in a worst-case scenario.</u></p> <p>LCC stand by their statement.</p> <p>Would occupiers of Green Bank Farm and Freshfield Farm not experience significant effects during construction?</p>	<p>Ongoing point-of discussion <del>Not agreed</del></p>
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**Commented [Nat1]:** LCC's comments have been noted (with thanks), and the Applicants' text in this column has been revised for clarity.

LCC.LVR.23	Assessment of effects	<p>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 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.</p> <p><u>The Applicants have consistently communicated what is achievable within the defined parameters of the Project, as evidenced throughout their submissions to the Examination.</u></p> <p><u>The Applicants acknowledge the nature of engagement that has taken place since the submission of the DCO application, noting that meaningful dialogue is most effective when all parties approach the process constructively, prepared to exchange perspectives and explore options through the structured engagement opportunities provided, rather than repeating positions set out in previously written representations.</u></p>	<p><b>The Council <u>strongly disagrees</u></b> that the Applicants have assessed the potential residual effects of the Transmission Assets, including impacts on relevant landscape and visual resources during both day and night, and across construction, decommissioning, operation, and maintenance phases.</p> <p><u>The Council has significant concern that many residual landscape and visual effects could be better and sufficiently addressed by further relatively straightforward and non-onerous mitigation, that this has been communicated to the Applicant over the last 6 month period, but has not been addressed. There is therefore ongoing concern that the Applicant will not address these concerns post consent.</u></p> <p><u>There is concern in this process whereby comments are repeatedly communicated back to the Applicant, whilst the Examiner in most cases does not see and is not aware of this constant attempt at dialogue and constructive recommendations, the lack of acknowledgement and addressing of concerns.</u></p> <p>Aspects in bold in the Applicants column are not considered to have taken place. If they had the position would have moved forward.</p>	
LCC.LVR.24	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> <ul style="list-style-type: none"> <li>• LCA 19a: Coastal Dunes – Fylde Coastal Dunes (landfall); and</li> </ul>	<p><b>The Council disagrees</b> that the Applicants have fairly identified the <del>short-term</del> significant effects (in EIA terms) arising from the construction phase of the Transmission Assets on the listed landscape and visual receptors.</p> <p><u>The phrase 'short-term' should be removed and is objected to in the Applicants position, as short term is considered incorrect for a development, which could take place for 8 years +.</u></p>	<p>Ongoing point of discussion Not agreed</p>



		<ul style="list-style-type: none"> <li>LCA 15d: Coastal Plain – Fylde (onshore substations)</li> </ul> <p><u>Visual Receptors</u></p> <ul style="list-style-type: none"> <li>Viewpoint 1 bridleway BW0505016 south of Morgan onshore substation site;</li> <li>Viewpoint 3 bridleway BW0505016 west of Morgan onshore substation;</li> <li>Viewpoint 6 footpath FP050503 south of Morecambe onshore substation site;</li> <li>Sequential effects on people using PRoW BW0505016, FP050503 and FP050504;</li> <li>People using beach;</li> <li>People using Blackpool Road Recreation Ground;</li> <li>People using PRoW BW0502012, BW0502013, BW0502016, BW0503012, FP050302, FP05010011, FP050304, FP050305, FP050502, BW0509012, FP00905, FP070907 and FP0709010 (export and 400 kV cables);</li> <li>People using National Cycle Route 62 at Hillock Lane (export cable); and</li> <li>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)</li> </ul> <p>No other significant effects on landscape character or visual receptors would arise during the construction of the Transmission Assets.</p>	<p><u>The Applicant to include significant effects to Freshfield Farm and Green Bank Farm.</u></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. <u>Also, in Council responses to Applicants on submission documents over this period.</u></p> <p><u>The Applicant should specifically set out the effects on Landscape Character, particularly in the Substation areas and not over generalise.</u></p> <p><u>These include:</u></p> <ul style="list-style-type: none"> <li><u>Loss to Openness and Views</u></li> <li><u>Loss to rural character, field pattern, trees and ponds</u></li> <li><u>Loss of tranquillity</u></li> <li><u>Loss of Recreational Assets for wellbeing and health</u></li> </ul>	
LCC.LVR.25	Assessment of potential effects during operation	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	<b>The Council disagrees</b> with <del>certain</del> judgments presented by the Applicants in their assessment of effects.	Ongoing point of discussion Not agreed

		<p>operation phase on the following landscape and/or visual resources:</p> <p><u>Landscape Character</u></p> <ul style="list-style-type: none"> <li>LCA 15d: Coastal Plain – Fylde (Year 1 before landscape mitigation planting has established).</li> </ul> <p><u>Visual Receptors</u></p> <ul style="list-style-type: none"> <li>Sequential effects on people using PRoW BW0505016, FP050503 and FP050504 (Year 1 before landscape mitigation planting has established).</li> </ul> <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>	<p><del>The Council presents its conclusions, as detailed in the Local Impact Report (REP1-085), and the Council's responses to ExQ1 (REP3-084) and ExQ2 (REP5-173). The Council's final judgments are set out below and should be considered alongside any response to the Applicant over the previous 6 month + period in conjunction with the relevant sections of the aforementioned documents.</del></p> <p><u>Landscape Character</u></p> <p>LCA 15d: Coastal Plain – Fylde – <b>Major Adverse (significant) at Year 1 and 15.</b></p> <p><u>Visual Receptors</u></p> <p>Viewpoint 1 bridleway BW0505016 – <b>Major Adverse (significant) at Year 1 and 15.</b></p> <p>Viewpoint 2 Strike Lane – <b>Major Adverse (significant) at Year 1 and 15; if the view was relocated to the end of Strike Lane, as proposed in REP1-085 and REP3-084.</b></p> <p>Viewpoint 3 bridleway BW0505016 – <b>Major Adverse (significant) at Year 1 and 15.</b></p> <p>Viewpoint 4 Parrox Lane – <b>Moderate adverse (not significant) at Year 1 and 15.</b></p> <p>Viewpoint 5 footpath FP0509005 – <b>Moderate adverse (not significant) at Year 1 and 15.</b></p> <p>Viewpoint 7 Kirkham Bypass – <b>Moderate adverse (not significant) at Year 1 and 15.</b></p> <p>Viewpoint 12 bridleway BW0505016 – <b>Major Adverse (significant) at Year 1 and 15; where users of the bridleway are closest to Morgan substation.</b></p> <p><u>It is considered insufficient to refer solely to Viewpoints and not to general effects.</u></p> <p><u>These would include:</u></p>	
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			<ul style="list-style-type: none"> <li>• <u>Loss of Openness and Views, particularly to Green Belt areas in which Substation areas are proposed.</u></li> <li>• <u>Loss to rural and landscape character, field pattern and particularly ponds (which should be restored in character with the existing landscape).</u></li> <li>• <u>Loss of tranquillity, particularly on PRoW's and Bridleway in vicinity of the Substations.</u></li> <li>• <u>Views of Scale and Form of industrial style built form and associated paraphernalia, out of landscape character with openness, views characteristic of the Green Belt and rural agricultural area. Extension of the urban edge into rural areas</u> and compromising the distance, area between various nearby settlements.</li> <li>• <u>Associated urban elements introduced to the rural area, such as 3m industrial style fencing and an access road at a significantly larger scale than the local A roads.</u></li> </ul>	
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Outline Design Principles, Outline Mitigation and Landscape Proposals				
LCC.OMLPL- VR.126	Measures (commitments)	The mitigation measures and monitoring outlined in Volume 3, Chapter 10 Landscape and Visual Resources (APP-123), the Commitments Register ( <a href="#">document reference F1.5.3AS-030</a> ), and the Outline Landscape Management Plan ( <a href="#">APP-208document reference J2</a> ) are appropriate in the environmental mitigation of potential effects arising from the onshore substations.	<p><b>The Council disagrees</b> with the Applicants' position, considering the proposed mitigation and monitoring measures to be <u>insufficient adequate</u> for addressing potential environmental effects from the onshore substations.</p> <p><u>The Council has little confidence that the Applicant will address landscape and visual concerns post consent, as these have been raised over the last 6 months+ in responses to the Applicant and not as much as acknowledged by the Applicant, other than in conversations, which are not documented.</u></p> <p><u>There have been no changes by the Applicants to Documents and Drawings.</u></p> <p><u>The Council considers that further off site mitigation measures are required to help reduce landscape and visual effects. These include planting up hedgerows which currently exist as post and wire, or are gapped, planting of rough open areas adjacent to Manor Drive to reduce direct visual effects on the Morgan Substation and particularly the new access area (an option for advanced planting with quick growing species could be considered and agreed) and planting which actually replicates landscape character, rather than emphasises the alien built form.</u></p> <p><u>Equally, measures being 'indicative' regarding cut and fill and current performance, again, offer little guarantee and confidence that these measures would be undertaken sufficiently to improve the visual outlook of the Substations.</u></p> <p><u>The finer detail such as species is not an issue, it is generally the fundamental design issues and concepts which are not yet resolved.</u></p>	<p>Ongoing point of discussion Not agreed</p>

			<p>Further Commitments are required.</p> <p><del>The ongoing engagement programme on the outline Design Principles (APP-209) document and related documents is intended to resolve this disagreement.</del></p>	
LCC.LVR.OM LP.27	Outline Management Plans	<p>The measures set out in the Outline Landscape Management Plan (<del>APP-208</del><a href="#">document reference J2</a>) are secured in the draft DCO- (<a href="#">document reference C1AS-004</a>) and are appropriate with regard to proposed mitigation measures and monitoring.</p>	<p><b>The Council disagrees</b> 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 <del>o</del>Outline Design Principles and related documents <a href="#">has done little to provide assurance of an agreed Landscape Proposals Plan.</a></p> <p><a href="#">The Council reiterates that the substations would significantly affect the surrounding landscape character, impacting openness and visual elements of the Green Belt, rural and agricultural field areas demarcated by hedgerows and its tranquillity.</a></p> <p><a href="#">This would be replaced with a several industrial style built forms, out of scale and with a presence strongly out of character with the rural context, introducing large scale urban elements, which weaken the appearance and purpose as a Green Belt area, and extend the urban area into the Green Belt.</a></p> <p><a href="#">Pond restoration and replacement should be in character with the existing landscape, i.e. frequent and scattered within field areas as currently exists.</a></p> <p><a href="#">Visual effects would continue to impact residents, businesses, visitors, recreational users and could be further mitigated.</a><del>The ongoing engagement programme on the outline</del></p>	<p>Ongoing point of discussion <a href="#">Not agreed</a></p>

			Design Principles (APP-209) document and related documents is intended to resolve this disagreement.	
LCC.LVR.28	Outline Design Principles	The Design Principles and Design Coding provided in the Outline Design Principles (APP-209) document provide <b>adequate</b> design governance to address the discharge of requirement, post consent award.	<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 <b>disagrees</b> 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 <i>outline Design Principles</i> (APP-209) document and related documents is intended to resolve this disagreement.</p>	Ongoing point of discussion
LCC.OMLP.3	Outline Design Principles	The oDP (document reference J3) sets out the design processes for all aspects of the Projects, following best practice guidance.	In its response to the Examining Authority's written question ExQ 13.1.5 (REP3-082), the Council states that:	Not agreed
LCC.OMLP.4	Outline Design Principles	The oDP (document reference J3) 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.	<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>	
LCC.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) have been prepared in consultation with the Council and are <b>not</b> agreed.	The comments above refer to an iteration prior to OLMF3, current ODP (14.10.25 response to Applicant).	

**Commented [NAt2]:** It is acknowledged that LCC's latest comments are based on the version of the SoCG received on 23 September 2025.

A revised version was subsequently shared on 14 October 2025, which includes more detailed distinctions between areas of agreement and disagreement between the Councils and the Applicants, aligning with the approach taken in the *Fylde Borough Council SoCG* on the same topic.

Accordingly, LCC's position is reflected throughout the Applicants' responses as an overarching position.

Please amend or replace as appropriate. Thank you.

<u>LCC.OMLP.6</u>	<u>Outline Design Principles</u>	<u>The indicative post consent programme – set out in Section 6 of the oDP (document reference J3) – establishes a satisfactory process to support delivery of good design.</u>	<u>The Council has however strong disagreement with the current ODP and consider the document bias and unrepresentative of the concerns LCC has raised over the last 6 month + period.</u>	
<u>LCC.OMLP.7</u>	<u>Outline Design Principles</u>	<u>The appointment of a Design Champion for each Applicant is supported and will benefit the delivery of good design, post consent.</u>	<u>As such, it <b>cannot be accepted</b> and presents real concerns that landscape and visual issues would be addressed post consent.</u>	
<u>LCC.OMLP.8</u>	<u>Outline Design Principles</u>	<u>The commitment to the preparation of a Compliance Report to be submitted in support of Requirements discharge is supported.</u>	<u>The Council considers that as the area is highly valued and has purpose as Green Belt the Applicants efforts should be more than 'adequate' as stated in their position.</u>	
<u>LCC.OMLP.9</u>	<u>Outline Design Principles</u>	<p><u>It is not considered necessary to impose an Independent Design Review Panel (IDRP) on the Council at this stage.</u></p> <p><u>Any requirement for an IDRP should be determined post-consent by the discharging authority, in consultation and agreement with the Applicants.</u></p> <p><u>The Applicants are committed to continued engagement with the discharging authority, FBC, as part of the post-consent design process. The oDP establishes 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.</u></p>	<u>An Independent Design Review Panel would be welcomed to ensure progress in a constructive manner, which addresses concerns raised.</u>	

**Appendix C - LCC LLFA Comments on the Green Belt and Separation section of the Morgan And Morecambe Offshore Wind Farms: Transmission Assets Lancashire County Council SOCG, Document Ref. S\_D1\_6.1/F03 (REP4-079).**



# MORGAN AND MORECAMBE OFFSHORE WIND FARMS: TRANSMISSION ASSETS

Lancashire County Council SoCG (**LCC Comments 21.10.25**)



Deadline: Deadline 5  
Application Reference: EN020028

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Signatories	
Signed	
Name	
Date	
Position	
For	Lancashire County Council
Signed	
Name	
Date	
Position	
For	Morgan OWL
Signed	
Name	
Date	
Position	
For	Morecambe OWL

## Glossary

Term	Meaning

## Acronyms

Acronym	Meaning
CoCP	Code of Construction Practice
DCO	Development Consent Order
EnBW	Energie Baden-Württemberg AG
FRA	Flood Risk Assessment
LCC	Lancashire County Council
MLWS	Mean Low Water Springs
PRoW	Public Rights of Way
SoCG	Statement of Common Ground

# **1 Initial Statement of Common Ground between Morgan and Morecambe Offshore Wind Farms: Transmission Assets and Lancashire County 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 Lancashire County Council 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 Lancashire County Council 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 Lancashire County Council's remit**

1.1.2.1 The Lancashire County Council is the county planning authority, the highways authority, and the lead local flood authority for the area in which the Transmission Assets are located. The County Council also has a statutory remit with regard to Public Rights of Way.

1.1.2.2 The elements of the Transmission Assets which may affect the interests of Lancashire County Council are within Work Number 4A, 4B to 54A, 54B landward to Mean Low Water Springs (MLWS). These are detailed in Schedule 1 (Authorised Project), Part 1 (Authorised Development) of the Draft DCO (AS-004).

1.1.2.3 This SoCG covers the following topics of relevance to Lancashire County Council:

- Hydrology and Flood Risk;
- Onshore Ecology and Nature Conservation;
- Green Belt and Area of Separation;

- Landscape and Visual Resources
- Land Use and Recreation;
- Historic Environment
- Traffic and Transport
- 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 Lancashire County Council within its response to **[insert e.g. Scoping, Section 42 consultation and as raised through the [insert EWG if applicable]** that has underpinned the pre-application consultation between the parties. This SoCG also includes those issues raised by Lancashire County Council 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 log.

## 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 (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
Hydrology and Flood Risk	Ongoing point of discussion
Onshore Ecology and Nature Conservation	Ongoing point of discussion

**Commented [LE1]:** Awaiting infill; include also LCC responses to GBTN Aug 25



Topic	Agreement status
Green Belt and Separation	Ongoing point of discussion
Landscape and Visual Resources	Ongoing point of discussion
Land Use and Recreation	Ongoing point of discussion
Historic Environment	Ongoing point of discussion
Traffic and Transport	Ongoing point of discussion
DCO	Ongoing point of discussion

Commented [LE2]: Not agreed category mark as red L& V also Red

### 1.3 Summary of Consultation

1.3.1.1 Table 1.2 provides below provides a summary of the consultation undertaken by the Applicants with Lancashire County Council during the pre-application phases of the Transmissions Assets. Table 1.3 below provides a summary of the consultation undertaken by the Applicants with Lancashire County Council during the post-application phases of the Transmission Assets.

**Table 1.2: Summary of pre-application consultation with Lancashire County Council**

Date	Form of consultation	Statutory or non-statutory engagement	Summary of consultation
<b>Evidence Plan Process, Historic Environment EWG</b>			
18 January 2023	EWG01	Non-statutory engagement	Matters discussed include study area buffer agreement of 500m, geoarchaeological deposit modelling with topographical surveys. LCC representative agreed with general approach proposed in the meeting.
9 August 2023	EWG02	Non-statutory engagement	Consultees agreed with the proposed approach to agreeing trial trenching, which will be agreed in sections and geophysical surveys are progressed. LCC rep to share survey work for a nearby solar farm.
8 February 2024	EWG03	Non-statutory engagement	Matters discussed include redrafting the DBA, survey coverage, PEIR data release and the onshore WSI. Specification no longer required for the DBA.
<b>Evidence Plan Process, Traffic and Transport EWG</b>			
16 March 2023	EWG01	Non-statutory engagement	Data, models and figures to be provided for methodology. Matters discussed include reviewing existing modelling, info

Commented [LE3]: Why all consultation relevant-specific to Green Belt & Landscape?

Date	Form of consultation	Statutory or non-statutory engagement	Summary of consultation
			requests for access track locations. LCC to provide further comments on scoping report.
12 September 2023	EWG02	Non-statutory engagement	Matters discussed include- LCC to provide modelling reports, agreement of PEIR approach, and liaising with Blackpool Council regarding the updated study area and RLB.
15 August 2024	EWG03	Non-statutory engagement	<p>Site-selection updates, highlighting key changes in the Transmission Assets Order Limits; updates in the assessment baseline and the identification of new road schemes since the submission of PEIR and statutory consultation; transport EIA updates in line with the evolution of the project. LCC questioned if the approach and background information will be shared with the local authorities to check they agree with the methodology, highlighted the importance of presenting sufficient information to allow the highway authorities to come up with a conclusion on whether highways impacts can be accommodated. As well as the influence of seasonal traffic e.g. during the summer and for the Blackpool illuminations. LCC wanted sufficient information within the CTMP to allow the approach to be investigated.</p> <p>The highways authorities want to work collaboratively with the applicant</p> <p>LCC queried what restrictions will be in place for construction traffic, especially around sensitive areas.</p>
<b>Evidence Plan Process, Hydrology and Flood Risk EWG</b>			
3 May 2023	EWG01	Non-statutory engagement	Matters discussed include accessing and sharing data for the FRA, confirming metrics to be used in calculations.

Date	Form of consultation	Statutory or non-statutory engagement	Summary of consultation
10 August 2023	EWG02	Non-statutory engagement	Matters discussed include requesting missing map data from council, reviewing possibility of sending out RLB and borehole data, and climate data allowance update.
21 November 2023	Section 42 Statutory Consultation Response	Statutory engagement	<p>LCC identified the need for the following information:</p> <ul style="list-style-type: none"> <li>• Lifetime maintenance and management of the project</li> <li>• Disruption prevention measures</li> <li>• Surface water flood risk</li> <li>• Impacts on ordinary water courses</li> <li>• Demonstration of legislative compliance</li> <li>• Demonstration of ecological impact avoidance</li> <li>• Impact on designated sites</li> </ul> <p>Other concerns include the scope of ecological assessments, potential working hours and biodiversity net gain.</p>
30 January 2024	EWG03	Non-statutory engagement	Matters discussed include the technical note on climate change datasets and models to be produced, mapping queries and joint SFRA feedback.
<b>Evidence Plan Process, Onshore Ecology (including Onshore and Intertidal Ornithology) EWG</b>			
23 March 2023	EWG01	Non-statutory engagement	<ul style="list-style-type: none"> <li>• The proposed scope of the onshore ecology (and onshore and intertidal ornithology) surveys in terms of species, survey coverage and methodologies.</li> <li>• The species for which surveys are not proposed</li> </ul>
13 September 2023	EWG02	Non-statutory engagement	Discussion on the approach to BNG taking into account the large area covered by the Order Limits and the limited scale of potential impacts.
18 December 2023	EWG03	Non-statutory engagement	<ul style="list-style-type: none"> <li>• Further discussion on the approach to BNG including the commitment to submit a Biodiversity Benefit Statement</li> </ul>

Date	Form of consultation	Statutory or non-statutory engagement	Summary of consultation
			<ul style="list-style-type: none"> <li>The exclusion of areas from the BNG baseline (e.g. proposed mitigation areas at landfall)</li> </ul>
26 January 2024	EWG04	Non-statutory engagement	<ul style="list-style-type: none"> <li>Coverage of ecology surveys was presented during the meeting with further detail provided in a technical note</li> <li>Use of trenchless techniques at crossing locations to avoid or reduce direct and indirect effects on onshore ecology and nature conservation.</li> <li>Information that would be required to demonstrate that the ancillary works would not cause indirect effects to habitats at Lytham St Anne's Dunes and River Ribble crossing.</li> </ul>
31 May 2024	EWG05	Non-statutory engagement	Discussion on the survey coverage at submission
19 June 2024	EWG06	Non-statutory engagement	Discussion on proposed mitigation for onshore ecology and onshore and intertidal ornithology
27 June 2024	EWG07	Non-statutory engagement	Discussion on the survey coverage and the approach to surveys where data gaps exist.
<b>Evidence Plan Process, Land Use and Recreation</b>			
19th September 2024	Meeting regarding Public Rights of Way	Non-statutory engagement	<p>Outline Public Right of Way management proposals. The following key items were presented for agreement;</p> <ul style="list-style-type: none"> <li>The identification of PRoW located within the Onshore Order Limits;</li> <li>and • The outline management measures proposed for each PRoW identified, including requirements for managed crossing and temporary diversion.</li> </ul> <p>Responses received during the EWG were subsequently used to inform relevant sections of this chapter of the ES and supporting documentation.</p>

Date	Form of consultation	Statutory or non-statutory engagement	Summary of consultation
<b>Evidence Plan Process, Landscape and Visual Impacts EWG</b>			
22 February 2024	EWG01	Non-statutory engagement	<ul style="list-style-type: none"> <li>To scope out seascape effects from the assessment in response to a reduction in the offshore element of the Transmission Assets</li> <li>To agree the representative viewpoint locations for the onshore substations and River Ribble crossing head houses</li> <li>To present grey rendered photomontages of the main buildings and infrastructure at the onshore substations for all viewpoint locations.</li> </ul>
24 September 2024	Design Principles and Landscape management meeting	Non-statutory engagement	Matters discussed include outlining design process, landscape strategy update

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

Date	Form of consultation	Statutory or non-statutory engagement	Summary of consultation
19 November 2024	Meeting with Lancashire County Council	Non Statutory	Project Overview including order limits, surveys and programme. Summary of Traffic and Transport impacts and mitigation. Next steps including development of Outline Highways Access Management Plan and Outline Construction Traffic Management Plan.
17 <sup>th</sup> January 2025	Meeting with Lancashire County Council as Lead Local Flood Authority	Non Statutory	Meeting to discuss protective provisions.
27 January 2025	Relevant Representation	Statutory	Provision of Lancashire County Council's Relevant Representation (RR-1262)
12 <sup>th</sup> March	Meeting with Lancashire County Council as Local Highway Authority	Non Statutory	Discussion on Relevant Representation and key concerns specifically; <ul style="list-style-type: none"> <li>Delivery hours</li> </ul>

Date	Form of consultation	Statutory or non-statutory engagement	Summary of consultation
			<ul style="list-style-type: none"> <li>Highway condition (inc. peat roads)</li> <li>Route geometry</li> <li>Outline access designs</li> <li>Abnormal loads (highway structures)</li> </ul>
7 <sup>th</sup> April	Meeting with Lancashire County Council as Local Highway Authority	Non Statutory	Update on key workstreams in response to matters raised within LCCs relevant representation.

## 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.

## 1.4.2 Green Belt and Area of Separation

**Table 1.5: Agreement Log between the parties on Green Belt and Area of Separation**

Reference Number	Discussion point	Applicants' position	Lancashire County Council position	Status
<b>Green Belt</b>				
<b>Site Selection</b>				
LCC.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 Penwortham Substation.	LCC recognise that a site selection exercise 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.	Mark as Red
			In relation to cable routing, LCC acknowledge that Green Belt could not be avoided in its entirety in connecting the landfall location to Penwortham Substation. However, LCC consider that the extent to which Green Belt is to be affected could be Mitigated. Omit text highlighted	Ongoing point of discussion
			In relation to the substation locations, LCC consider that Green Belt should have been identified as a constraint at an earlier stage of the site selection process and Assessment process which was communicated earlier and different radii explored beyond the random 8km. Also that the Applicants should have tried to identify independent (rather than co-located) sites for the substations which were outside the Green Belt.	
LCC.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 400 kV grid connection cables that would link the new	As noted above, LCC 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 and that different radii >8km	

**Commented [NA4]:** Please note that the positions proposed in this column are *provisional*, reflecting exchanges between the Applicants and LCC during the Examination via SoCG meetings and written representations.

**Commented [LE5]:** Mark as Red

Reference Number	Discussion point	Applicants' position	Lancashire County Council position	Status
		substations to the POI, minimise cable reactive 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.	<b>should have explored sites outside Green Belt areas.</b> LCC consider that proper consideration of separate, independent sites for the substations (geographically separate, not co-located sites) in areas outside the Green Belt has not been given in site selection.	
LCC.GB.3	Site Selection	The Applicants have provided reasoned justification to explain why the substations cannot be co-located on a single site. This is principally due to the substations being electrically separate and to avoid interference during construction and operation. 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.	<b>A single site for the substations is not desirable, as it compounds even further landscape and visual effects. Substations as close to one another as proposed also compound and create greater landscape and visual effects and greater effects on the Green Belt.</b>	Ongoing point of discussion
<b>Policy</b>				
LCC.GB.4	Policy and Planning	The Applicants have appropriately identified and considered all plans and policies relevant to the Green Belt <b>within LCC's remit in the Application omit. State what these are.</b>	<b>To be updated</b>	Ongoing point of discussion
LCC.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.	<b>To be commented upon by LCC Planning.</b>	Ongoing point of discussion

**Commented [NAt4]:** Please note that the positions proposed in this column are *provisional*, reflecting exchanges between the Applicants and LCC during the Examination via SoCG meetings and written representations.



Reference Number	Discussion point	Applicants' position	Lancashire County Council position	Status
LCC.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 <b>may would</b> include relevant policies, guidance and strategy documents within the NPPF and local development plans. <b>State these in an Annex.</b>	Awaiting update	Ongoing point of discussion
LCC.GB.7	Policy and Planning	The fundamental aim of Green Belt, namely 'to prevent urban sprawl by keeping land permanently open' and the essential characteristics of 'openness and permanence' as set out in paragraph 142 of NPPF 2025 are clear and agreed <b>and to be read in conjunction with the 5 purposes of Green Belt.</b>	This is <b>potentially</b> agreed.	Ongoing point of discussion
LCC.GB.8	Policy and Planning	Green Belt is a land use and spatial policy 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.	Green Belt can be of local and high value. It can fulfill any of the 5 purposes which are afforded to Green Belt. By its status it contributes to Landscape Character and local and visual amenity.	Ongoing point of discussion
LCC.GB.9	Policy and Planning	The 'openness' of Green Belt is capable of having both spatial and visual elements. 'Openness' does not imply a freedom from any built form.	The Green Belt area where both Substations are proposed are open and have both spatial and visual elements. Built form should generally relate to permitted and acceptable forms of built development. E.g. Agricultural uses etc.	Ongoing point of discussion
LCC.GB.10	Policy and Planning	When considering 'spatial' openness, the relevant factors are the scale, form and density of built development.	Spatial openness would also include the volume of built development and its arrangement and layout, whether e.g. it permits openness to continue in the Green Belt. It could relate to the elements in the existing landscape which can add to or permit spatial openness. In this instance the open agricultural field areas, with generally low managed	Ongoing point of discussion

**Commented [Nat4]:** Please note that the positions proposed in this column are *provisional*, reflecting exchanges between the Applicants and LCC during the Examination via SoCG meetings and written representations.

Reference Number	Discussion point	Applicants' position	Lancashire County Council position	Status
			hedgerows permit openness with long and distant views and help to separate settlement areas. The proposed development prevents openness by restricting views.	
LCC.GB.11	Policy and Planning	<p>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.</p> <p>It is noted that spatial and visual openness work in synergy and should not be considered in isolation in decision making.</p>	<p>Visual openness applies to the proposed substation sites, particularly the Morgan site, here the slightly raised topography permits open views across agricultural and rural areas, to nearby settlements and hills beyond. The proposed substations prevent this visual openness, views cannot flow over or around and their permanence prevents this for a long period. It is likely that this could not be reestablished on decommission.</p> <p>Visual openness contributes to the space between settlements, helping maintain a sense of place.</p>	Ongoing point of discussion
LCC.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 judgement' (paragraph 25) and that, whilst decision makers are not obliged by law to consider visual impacts, they may form a material consideration.	<p>Timmins v. Gedling Borough Council [2014] EWHC 654 (Admin) "[any] construction harms openness quite irrespective of its impact in terms of its obtrusiveness or its aesthetic attractions or qualities"</p> <p>The concept of openness is not one which is narrowly limited to volumetric approach but is 'open-textured' and relates to a number of factors, which are capable of being relevant as well as visual.</p>	Ongoing point of discussion
LCC.GB.13	Policy and Planning	To this end, 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.	Landform plays a minor role in visual enclosure, both on flat coastal plains and for the Substation sites, where there is additional emphasis due to its ridgeline location. Here planting mitigation would screen the Substations in part, however it would restrict and change current openness and long and distant views, therefore the harm from the proposed development and to the openness spatially or visually would remain.	Ongoing point of discussion

**Commented [NAt4]:** Please note that the positions proposed in this column are *provisional*, reflecting exchanges between the Applicants and LCC during the Examination via SoCG meetings and written representations.

**Commented [LE6]:** Comment moved from LCC to Applicant

Reference Number	Discussion point	Applicants' position	Lancashire County Council position	Status
			Planting and Landform manipulation mitigate impacts of development in part, but these also change and irretrievably destroy this area of the Green Belt , its intrinsic qualities of openness and weaken its ability to fulfil its purposes within the wider area.	
<b>Function and Purposes of the Green Belt</b>				
LCC.GB.14	Policy and Planning	The five purposes of the Green Belt are as defined in paragraph 143 of the NPPF 2025.	Agreed	
LCC.GB.15	Policy and Planning	The purposes of Green Belt that have relevance to this Application are a) 'to check the unrestricted sprawl of large built up areas' and c) 'to safeguard the countryside from encroachment'.	LCC agreed that purposes a) and c) were identified by the Applicant as being the purposes of relevance, but question whether purpose b) is also of relevance (without knit picking about size of development)	Ongoing point of discussion
LCC.GB.16	Policy and Planning	Purpose c) 'to safeguard the countryside from encroachment' is the principal issue to be addressed.	Disagree that its the 'principal' issue, rather it is one of the main issues.	Ongoing point of discussion
LCC.GB.17	Policy and Planning	Purpose b) 'to prevent neighbouring towns merging together' 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, 'This purpose [b)] relates to the merging of towns, not villages'.	LCC acknowledge that Kirkham is a town but suggest due to their growing sizes Newton with Scales and Freckleton are in between villages and towns, therefore queries whether there should be knit picking re this element of the PPG.  LCC note that the area of Green Belt between Kirkham and Freckleton, works alongside the Area of Separation directly east of the Substation Development sites to prevent the spread of Kirkham towards Newton with Scales.	Ongoing point of discussion

**Commented [NAt4]:** Please note that the positions proposed in this column are *provisional*, reflecting exchanges between the Applicants and LCC during the Examination via SoCG meetings and written representations.

Reference Number	Discussion point	Applicants' position	Lancashire County Council position	Status
LCC.GB.18	Policy and Planning	The remaining purposes set out in paragraph 143 of the NPPF, namely: d) 'to preserve the setting and special character of historic towns' and e) 'to assist in urban regeneration, be encouraging the recycling of derelict and other urban land' are not considered to be of material relevance to this Application.	Agreed.	
LCC.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.	Agree in principle, but Blackpool Airport for the main part maintains openness so would note it has more than just one purpose and this should be acknowledged. Equally other Green Belt land uses in this area generally maintain openness. The latter is especially important within the landfall area.	
LCC.GB.20	Function and Purpose	The area of Green Belt between Kirkham and Freckleton is adjoined by areas of Separation and Countryside designations which complete the policy coverage of land between the surrounding settlements. <u>Although Freckleton is a village, given the presence of the wider policy coverage in this area, the primary function of the area of Green Belt between Kirkham and Freckleton is to protect the area of land which stretches north-south between Kirkham and Freckleton these two settlements and their settlement boundaries. The Green Belt does not extend to settlement boundaries in an east-west direction.</u>	Directly east of the Green Belt and Substation Site is the Area of Separation. This designation by FBC designed to work alongside the Green Belt designation to strengthen and protect the openness not just north and south, but also east and west.	
LCC.GB.21	Function and Purpose	The area of Green Belt in South Ribble to be impacted by the Transmission Assets forms part	Potentially agreed. Post consent would need to check maintains these objectives.	

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Reference Number	Discussion point	Applicants' position	Lancashire County Council position	Status
		<p>of a much larger policy area which extends over the majority of the Borough.</p> <p>The main objective of the designation is to ensure control of development in certain areas, primarily open land in rural areas, to protect it from development, maintain the openness and character of the area and to restrict urban sprawl.</p>		
<b>Harm to Green Belt</b>				
LCC.GB.22	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.	<p>Agreed in part. Green Belt could have been designated by FBC with a view to two designations working alongside, i.e. the Area of Separation.</p> <p>Harm within the Green Belt particularly regarding openness would therefore impact on the Area of Separation. See also LCC.GB.30-35</p> <p>The Applicant recognises the proposed Harm to the Green Belt by attempts to mitigate and create planting 'buffers' to reduce the 'zone of influence' of the proposed development. This further reduces openness.</p>	Ongoing point of discussion
<b>Inappropriate Development</b>				
LCC.GB.23	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).	Paragraph 153 also states 'Any harm to the Green Belt, which explicitly includes harm to openness, must be given 'substantial weight' by decision makers.	
LCC.GB.24	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 <b>potentially</b> agreed. Perhaps use of would not will...conditional tense not guaranteed.	

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Reference Number	Discussion point	Applicants' position	Lancashire County Council position	Status
LCC.GB.25	Planning and Policy	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.	Also needs to state/ include where does not cause substantial harm to the openness of the Green Belt.	Ongoing point of discussion
LCC.GB.26	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 'engineering operations' for the purposes of paragraph 154 h) ii) and are not considered to be 'inappropriate development' in the Green Belt.	Potentially agreed however recommend that 'engineering operations' should have a timescale attached and should not be considered to change character of the 'Green Belt' for unquantified periods of time, unnecessarily. Considered timescales-no removal of Green Belt elements until specifically required and restoration (of openness and character) asap on completion of engineering works. i.e. Duration, Remediability & Degree of Activity	Ongoing point of discussion
LCC.GB.27	Assessment	Temporary construction compounds are also considered to be 'engineering operations' for the purposes of NPPF paragraph 154. <del>However, as development must also preserve the openness and not conflict with the purposes of Green Belt in order to benefit from the exception under paragraph 154, Temporary construction compounds are however, not considered to benefit from the exception under paragraph 154 in this instance (and are therefore "inappropriate development" as the scale and duration of the works may result in temporal harm to the openness of the Green Belt and represent some encroachment into the countryside, contrary to purpose c) of NPPF paragraph 143.</del>	This is <b>potentially</b> agreed, however time aspect as noted in LCC.GB.26 also applies.	
<u>LCC.GB.28</u>	<u>Assessment</u>	<u>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.</u>	Any harm to the Green Belt, which explicitly includes harm to openness, must be given 'substantial weight' by decision makers.	

**Commented [NAt4]:** Please note that the positions proposed in this column are *provisional*, reflecting exchanges between the Applicants and LCC during the Examination via SoCG meetings and written representations.

Reference Number	Discussion point	Applicants' position	Lancashire County Council position	Status
<b>Assessment Methodology</b>				
LCC.GB.28	Assessment	The <del>parties agree that the</del> 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>LCC 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, LCC do not necessarily agree with the outcomes of the Applicants' assessment.</p> <p>LCC do <b>Not Agree</b> with the Applicants assessment of the impact HMP Kirkham has on the existing openness of the Green Belt in the northern part of the designation between Kirkham and Freckleton.</p> <p>LCC consider that the openness of the Green Belt where Substations are proposed has been underplayed and that a greater acknowledgement of the Green Belt qualities should be recognised for coastal areas in and around Landfall.</p>	Ongoing point of discussion
LCC.GB.29	Assessment	The methodology used to assess the extent to which (if any) the Transmission Assets will 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>LCC <b>note</b> that the methodology set out in Appendix C (Table 9) is <b>initiated by the Applicant and as such does not follow any recognised or accepted Guidance rules</b>. It is recommended that 'total or major' should read as 'Significant' when relating to the 'major' category.</p> <p>LCC 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, <b>but also duration regarding the permanence of the structures and the infeasibility of the site ever being able to return to its current state (site areas would qualify as greybelt in future baseline)</b>. There is no knowing whether further applications would be made to extend the existing proposed size, within the 35 year period, potentially further affecting Green Belt). With regards to the wider transmission</p>	Ongoing point of discussion

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Reference Number	Discussion point	Applicants' position	Lancashire County Council position	Status
			cables areas it is the unknown duration, phasing, restoration and timing of the construction programme.	
<b>Scale of Harm</b>				
LCC.GB.30	Assessment	As land used for temporary compounds will be fully 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.	LCC agree that no permanent harm <b>should</b> be caused to the openness and purposes of the Green Belt once the compound areas are reinstated. <b>There is concern over the Duration of harm also when combined with Degree of Activity (or inactivity -features remaining whilst no construction) and that visual aspects of harm, despite being temporary are minimised. It is of particular concern on the beach/ landfall area.</b>	Ongoing point of discussion
LCC.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	LCC <b>potentially</b> agree that no permanent harm <b>should</b> be caused to the openness and purposes of the Green Belt, <b>however points noted in LCC.GB.30 apply and would need to ensure that these areas are not classed as 'greybelt' going forward?</b>	Ongoing point of discussion
LCC.GB.32	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.	It should be noted that the ' <i>engineering operations</i> ' elements of the substations are associated with the Substations (ingress/egress). They limit potential mitigation of the Substations and therefore help create Residual Impacts-as the areas cannot receive tree planting.	Ongoing point of discussion
LCC.GB.33	Assessment	The harm to the Green Belt by reason of inappropriateness and identified 'other harms', <b>principally</b> relates to the scale of proposed built form and the buildings within the substations leading to a <b>reduction</b> <b>lack of in</b> openness and encroachment into the countryside.	The harm to the Green Belt relates to several factors; these include the <b>number</b> and scale of industrial style buildings and associated forms, hardstandings, industrial style fencing which significantly impact on the spatial and visual aspects of the Green Belt. Also their Duration in terms of permanence and Remediability, as it is <b>unlikely that the Green Belt would ever be restored</b>	Ongoing point of discussion

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Reference Number	Discussion point	Applicants' position	Lancashire County Council position	Status
			<p>to its original condition (it would qualify as greybelt in future baseline). This is compounded by doubling the impacts by the location of two substations in such close proximity.</p> <p>The characterising features of openness- the views of rural agricultural areas, tranquillity etc. of this openness and the long distant views and horizons- this quality and freedom to breathe and from urban containment would be destroyed within the Green Belt area.</p>	
LCC.GB.34	Assessment	'Other harms' are considered to principally comprise the following: landscape and visual impacts and impacts to amenity, biodiversity and highways.	<p>'Other harms' include visual impacts from adjacent residents/ users, but fundamentally to the Landscape Character of the Green Belt. Open rural agricultural field areas, defined by low hedgerows which permit the open and long views.</p> <p>It is a relatively small Green Belt area, the scale of proposed development significantly effects the scale of the Green Belt area and therefore its ability to maintain its purpose.</p> <p>Other harm is created by Residual effects, the scope for further mitigation exists and therefore the Applicant has not 'minimised' the Residual impacts of the development in accordance with NPS EN1.</p> <p>Specifically in relation to Amenity this includes the use of the Bridleway and ProW close to the Substations. Consideration to further consider minimising Residual impacts are required.</p> <p>Permanent access tracks at 15m width are considered excessively wide and would create further impact on Landscape Character and negative Visual Effects.</p>	Ongoing point of discussion

**Commented [NAt4]:** Please note that the positions proposed in this column are *provisional*, reflecting exchanges between the Applicants and LCC during the Examination via SoCG meetings and written representations.

Reference Number	Discussion point	Applicants' position	Lancashire County Council position	Status
LCC.GB.35	Assessment	The harm caused by the substations <del>is can be</del> reduced and mitigated through good design, proposed planting and embedded mitigation.	Residual Effects of the Substation design need to address all aspects of the Proposed Development. To date the Applicant has committed to very little to guarantee that effects would be 'minimised' as far as possible. The Applicants have demonstrated wording which gives little confidence that issues would be addressed. For example Good Design seems to relate to the Substation operation only. Further commitments to minimising Visual and Landscape effects (as far as possible) should be detailed, inclusive of offsite planting and potentially positioning attenuation features off site.  Harm to Landscape Character ultimately could not be reduced or mitigated by the proposed development.	Ongoing point of discussion
<del>LCC.GB.36</del>	<del>Assessment</del>	<del>There are benefits to be gained by having two separate substations, opposed to one large substation (as described in the Applicant's Response to Examining Authority's Written Questions (REP3-056), Q13.1.10).</del>		<del>Ongoing point of discussion</del>
<b>Critical National Priority Infrastructure</b>				
LCC.GB.37	Policy and Planning	The Transmission Assets can be considered to comprise Critical National Priority Infrastructure as defined in NPS EN-1.	Agreed	
LCC.GB.38	Policy and Planning	The Applicants have applied the mitigation hierarchy in relation to the site selection process, <del>which demonstrates that Green Belt cannot be avoided (specifically, that the substations cannot reasonably be sited outside the Green Belt designation), the outline design principles which seek to minimise the impact of the Transmission Assets, and proposed landscaping and</del>	It is noted that the Applicants have applied an approach to the application of the mitigation hierarchy in the site selection process. LCC comment that this mitigation hierarchy should have applied a constraint of Green Belt in helping to determine the location of Substations outside Green Belt and that the radii used to determine site location should have extended beyond 8km. Good Design therefore has not been demonstrated.	Ongoing point of discussion

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Reference Number	Discussion point	Applicants' position	Lancashire County Council position	Status
		<del>biodiversity mitigation which seeks to mitigate the impacts which cannot be avoided.</del>		
		<u>In relation to cable routing, it is accepted that Green Belt cannot be avoided in its entirety.</u>	Agreed	
		<u>In relation to the substations, a site selection exercise has been undertaken which demonstrates that these could not reasonable be sited outside the Green Belt.</u>	See Response LCC.GB.38	Ongoing point of discussion
LCC.GB.39	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.	Response by LCC Planning.  Might mitigation be applied wider than just the hierarchy? i.e. Residual impacts? Is it a starting point?	Ongoing point of discussion
<b>Very Special Circumstances</b>				
LCC.GB.40	Assessment	Very special circumstances exist to justify the location of elements of the Transmission Assets in the Green Belt which include the wider environmental benefits associated with increased production of energy from renewable sources for the purposes of NPPF Paragraph 160	Agree that a case of very special circumstances can <b>apply to</b> the generation of renewable energy.	Ongoing point of discussion
			LCC consider that the site selection process did not consider Green Belt <b>a constraint and that as such the strategy to locate the potential Substation sites is flawed.</b> Proposing the substation development in Green Belt requires that VSC would need to be higher in terms of requirements to mitigate impacts and effects, that all efforts to mitigate Residual effects should be taken.	Ongoing point of discussion
LCC.GB.41	Assessment	The very significant benefits of increased production of energy from renewable sources outweigh the significant weight of any harm to be	See LCC.GB.40 response  Significant weight of harm to the Green Belt should not be outweighed without due consideration to	Ongoing point of discussion

**Commented [Nat4]:** Please note that the positions proposed in this column are *provisional*, reflecting exchanges between the Applicants and LCC during the Examination via SoCG meetings and written representations.

Reference Number	Discussion point	Applicants' position	Lancashire County Council position	Status
		caused to the Green Belt by virtue of inappropriate development.	minimise impacts of the Proposed Development by the Applicant. This has not yet been achieved.	
<b>Area of Separation</b>				
<b>Policy</b>				
LCC.GB.42	Policy and planning	Local Area of Separation policy is distinct from national Green Belt policy.	Agreed, however it is noted that in this instance the Green Belt reads <u>alongside</u> The Area of Separation.	Ongoing point of discussion
LCC.GB.43	Policy and planning	Development must be within an Area of Separation to harm it. Areas of Separation do not have a setting or a buffer zone.	See in relation to LCC.GB.22. This is a fairly small Green Belt Area. It is strengthened by its immediate proximity to The Area of Separation, as the two are read together in views and in a landscape context. The Proposed Substations would significantly effect the Green Belt, Landscape Character, and visual aspects when the two designations are read together. The Urban boundary would effectively move to the eastern extent of the Substations, rather than along the boundary of Freckleton Road and Kirkham Road.	Ongoing point of discussion
LCC.GB.44	Policy and planning	Following changes to the scheme design following the PEIR Report, no part of the Transmission Assets lies within the Area of Separation designation.	Agreed, there are however Moderately adverse views and views from businesses (relying on the rural context) within the Area of Separation.	Ongoing point of discussion

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