



MORGAN AND MORECAMBE OFFSHORE WIND FARMS: TRANSMISSION ASSETS

**Newton with Clifton and Freckleton Parish Councils
Statement of Common Ground**



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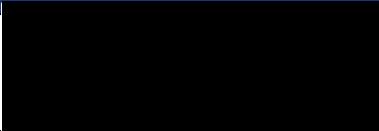

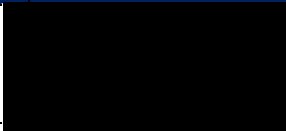

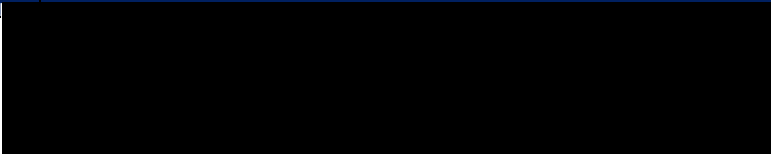

**Morgan Offshore Wind Limited,
Morecambe Offshore Windfarm Ltd**

Prepared for:

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

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Glossary

Acronym	Meaning
Applicants	Morgan Offshore Wind Limited (Morgan OWL) and Morecambe Offshore Wind Limited (Morecambe OWL)
Development Consent Order	An order made under the Planning Act 2008 granting development consent for one or more Nationally Significant Infrastructure Project (NSIP)
Environmental Statement	The document presenting the results of the Environmental Impact Assessment process.

Acronyms

Acronym	Meaning
BHS	Biological Heritage Sites
CEA	Cumulative Effects Assessment
CoCP	Code of Construction Practice
DCO	Development Consent Order
EIA	Environment Impact Assessment
ExA	Examining Authority
HNDR	Holistic Network Design Review
SoCG	Statement of Common Ground

1 Initial Statement of Common Ground between Morgan and Morecambe Offshore Wind Farms: Transmission Assets and Newton with Clifton and Freckleton Parish Councils

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 Newton with Clifton and Freckleton Parish Councils, 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 request for a SoCG between the Applicants and Newton with Clifton and Freckleton Parish Councils is set out in section 2 Appendix B of the Rule 8 letter issued by the Planning Inspectorate on Thursday 8 May 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 Newton with Clifton and Freckleton Councils remit

1.1.2.1 Newton with Clifton and Freckleton Parish Councils are two parish councils situated in the Fylde area close to the proposed substations and cable corridor, who represent their local communities and are making a joint SoCG. Although the two councils are interested in local areas of interest, they are also members of the TASC group which covers 8 town and parish councils along the full length of the route, and the Newton Residents Association, and will raise issues covering all of the route.

1.1.2.2 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 that Newton with Clifton and Freckleton Councils may wish to seek a SoCG on, but are open to reasonable adjustments:

- Site selection and Consideration of Alternatives

-
- Consultation;
 - Onshore Ecology and Nature Conservation;
 - Historic Environment;
 - Landscape and Visual Resources;
 - Hydrology and Flood Risk
 - Traffic and Transport;
 - Noise and Vibration and
 - Draft 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 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 examination phase of the Transmission Assets. This SoCG includes those issues raised by Newton with Clifton and Freckleton Parish Councils during the post-application phase (i.e. relevant representations).

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 22 October 2025 (Deadline 6).

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
Site Selection and Consideration of Alternatives	Not agreed
Consultation	Not agreed
Onshore Ecology and Nature Conservation	Not agreed

Topic	Agreement status
Historic Environment	Not agreed / Not agreed but not material in parts
Landscape and Visual Resources	Not agreed
Hydrology and Flood Risk	Not agreed
Traffic and Transport	Not agreed
Noise and Vibration	Not agreed
Draft DCO	Not agreed

1.3 Summary of Consultation

1.3.1.1 Table 1.2 and Table 1.3 below provides an overview of the consultation undertaken by the Applicants with Newton with Clifton and Freckleton Parish Councils during the pre-application phases of the Transmission Assets. Table 1.3 below provides a summary of the consultation undertaken by the Applicants with Newton with Clifton and Freckleton Parish Councils during the post-application phases of the Transmission Assets.

1.3.1.2 This initial SoCG makes reference to other documents submitted with the Transmission Assets applications that set out, in greater detail, the discussions that have taken place between Newton with Clifton and Freckleton Parish Councils and the Applicants. These documents are:

- The Consultation Report (APP-170) and annexes (APP-187 and APP-188)
- Newton with Clifton Parish Council Relevant Representation (RR-1616)
- Freckleton Parish Council Relevant Representation (RR-703)
- The Applicants' response to Newton with Clifton Parish Council at the Procedural Deadline
- The Applicants' response to Freckleton Parish Council at the Procedural Deadline

Table 1.2: Summary of pre-application consultation and engagement with Newton and Freckleton Parish Councils

Date	Form of consultation	Statutory or non-statutory engagement	Summary of consultation and engagement
Non-statutory consultation			
2 November to 13 December 2022	In-person consultation events and online webinar	Non-statutory	Newton with Clifton and Freckleton Parish Councils were invited to take part in the non-statutory consultation. As part of the consultation, a series of consultation events were

Date	Form of consultation	Statutory or non-statutory engagement	Summary of consultation and engagement
			<p>arranged, for which members of the Newton with Clifton Parish Council were in attendance in the capacity as a private landowner. No formal feedback was received.</p> <p>The parish council believe the consultation undertaken was inadequate. No events were held in the area affected by the transmission route. Only Lytham was covered. The parish councils believe this represents a deliberate attempt to minimise awareness and opportunity for comment by local stakeholders and residents. Please refer to Table 1.6 in this SoCG for the parish councils' position on consultation.</p> <p>The Parish Councils note the contrast with Mooir Vannin is marked. There was an on-line briefing all affected Parish Councils before the non-statutory consultation. There is an event in NEWTON WITH CLIFTON as part of the non-statutory consultation. Mooir Vannin have agreed to amendments to their documents used to promote and inform their events covering the alternative route. They have agreed to engage Parish Councils in the development of their Statement of Community Engagement and to provide resources (not money) to enable Parish Councils to participate fully in the statutory process. Finally they have agreed to try and facilitate a meeting of affected Parishes with OFGEM to discuss the alternative route.</p>
19 April to 4 June 2023	In-person consultation events and online webinar	Non-statutory	<p>Newton with Clifton and Freckleton Parish Councils were invited to attend the events and take part in the non-statutory consultation. As part of the consultation, a series of consultation events were arranged, for which members of the Newton with Clifton Parish Council were in attendance.</p>

Date	Form of consultation	Statutory or non-statutory engagement	Summary of consultation and engagement
			Formal feedback was received by both Newton with Clifton Parish Council.
1 June 2023	In person Parish Council meeting	Non-statutory	<p>The Applicants received and accepted a request from Newton with Clifton Parish Council to attend their Parish Council meeting, where a member of the Applicants team presented on the proposed development.</p> <p>The parish council believe the consultation undertaken was inadequate. No events were held in the area affected by the transmission route. Only Lytham was covered. The parish councils believe this represents a deliberate attempt to minimise awareness and opportunity for comment by local stakeholders and residents. Please refer to Table 1.6 in this SoCG for the parish councils position on consultation.</p>
8 September 2023	In person meeting	Non-statutory	<p>Preceding the launch of statutory consultation, the Applicants held a preview event for local elected representatives and parish councillors at Lytham Assembly Rooms on 8 September 2023. This gave attendees early sight of the information that was to be presented during the statutory consultation, including the proposed location for the onshore substations.</p>
12 October to 23 November 2023	In-person consultation events and online webinar	Statutory	<p>Newton with Clifton and Freckleton Parish Councils were invited to take part in the statutory consultation. As part of the consultation, a series of consultation events were arranged, for which members of Newton with Clifton and Freckleton Parish Councils were in attendance. Formal feedback was received by both parish councils. The Applicants issued a response to the feedback which is presented in Consultation Report Annex - Statutory consultation summary of responses and</p>

Date	Form of consultation	Statutory or non-statutory engagement	Summary of consultation and engagement
			Applicants' regard (Part 2 of 2) (APP-188)
13 October 2023	Private stakeholder briefing	Statutory	<p>A stakeholder briefing event was held at Lytham Assembly rooms. The parish councils and other key stakeholders were invited, such as local authorities and elected representatives, for which members of Newton with Clifton and Freckleton Parish Councils were in attendance. This provided the Applicants an opportunity to explain some of the key changes that had been made to the Transmission Assets since non-statutory consultation.</p> <p>The parish council believe the consultation undertaken was inadequate. This has been noted in previous representations submitted by the parish councils. Please refer to Table 1.6 of this SoCG for more information. That the ExA has accepted the application is noted. That doesn't change our views, expressed again on the failure to engage local residents affected by the proposed changes on Leach Lane before submission, that the consultation has been inadequate, and that view remains shared by the two Councils most involved - Fylde BC (AoC-008) and Lancashire CC (AoC-009).</p>

Table 1.3: Summary of post-application consultation with Newton and Freckleton Parish Councils

Date	Form of consultation	Statutory or non-statutory engagement	Summary of consultation and engagement
6 December 2024	Private Stakeholder Briefing	Non-Statutory	Following the application being accepted for examination, a stakeholder briefing event was held at AFC Fylde Football Club. The parish councils and other key stakeholders were invited, such as local authorities and elected representatives, for which members of Newton with Clifton and Freckleton Parish Councils

Date	Form of consultation	Statutory or non-statutory engagement	Summary of consultation and engagement
			<p>were in attendance. This provided the Applicants an opportunity to explain some of the key changes that had been made to the Transmission Assets since statutory consultation. Alongside of this, a community update newsletter was issued outlining they key changes.</p> <p>Newton with Clifton Parish Council acknowledge the receipt of the newsletter. However, unaware how widely the newsletter was shared.</p> <p>The Applicants can confirm the newsletter was printed and posted out to 52,582 properties, made available on the project website and emailed to stakeholders.</p>
27 January 2025	Relevant Representation	Statutory	Provision of Newton with Clifton Parish Council's Relevant Representation (RR-1616). The Applicants issued a response to RR-1616 on the 16 April 2025.
27 January 2025	Relevant Representation	Statutory	Provision of Freckleton Parish Council's Relevant Representation (RR-703). The Applicants issued a response to RR-703 on the 16 April 2025.
22 May 2025	Written Representation	Statutory	<p>Provision of Newton with Clifton and Freckleton Parish Councils (REP1-183). The Applicants issued a response to the written representation on the 9 June 2025 (S_D2_3.4).</p> <p>The parish council remain of the view that there is a alternative which is £900m cheaper, has far less consequences for the environment, no impact on BaE Systems defence compliance and would be welcomed by the local MP, councillor and landowners as a vital regeneration investment and skilled labour project.</p> <p>A further submission on this subject supplied by Deadline 4 representing the views of both Parish Councils (REP4-167). The constraints put forward regarding the use of a solution at Stanah/Hillhouse are a result of misconception and a lack of re-examining the assumptions prior to the HNDR being commenced. The resulting proposal does not comply with NPS EN3-3.3.9 requiring the use of brown field land where possible, especially when it is</p>

Date	Form of consultation	Statutory or non-statutory engagement	Summary of consultation and engagement
			designated as an Enterprise Zone - as Hillhouse is.
23 May 2025	Meeting	Non-statutory	Initial meeting to discuss the prospect of developing a SoCG between all parties.
11 August 2025	Change Request non-statutory consultation	Non-statutory	Notification issued to the parish councils on the Change Request consultation
28 August 2025	Meeting	Non-statutory	Meeting to progress SoCG

1.4 Agreement log

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

Table 1.4: Position definitions and colour coding

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

1.4.1.2 Table 1.5 to Table 1.13 sets out the level of agreement between the parties for each relevant component of the application (as identified in section 1.2.2).

1.4.2 Site Selection and consideration of alternatives

Table 1.5: Agreement Log between the parties on Site Selection and Consideration of Alternatives

Reference Number	Discussion point	Applicants' position	Newton with Clifton and Freckleton Parish Council's Position	Status
EIA				
NFPC.SS.1	Policy and planning	<p>The Application documents have identified and considered the most up-to-date plans and policies as relevant to site selection and consideration of alternatives.</p> <p>The Applicants position on delivering the Transmission Assets simultaneously is presented in the Statement of Reasons (REP4-016) and explains why we are unable to make this commitment.</p>	<p>There is no benefit to local people of the projects being together. Separation of the project means profound multiple impacts on local residents and businesses. This has been made very clear at the recent ISH2 &3 hearings as noted in REP4-167 submitted at Deadline 4.</p>	Not agreed
NFPC.SS.2	Baseline environment	<p>The baseline environment for site selection and consideration of alternatives was appropriately characterised in Volume 1, Chapter 4: Site Selection and Consideration of Alternatives (AS-026) at the point that the site selection process was undertaken.</p> <p>The Applicants undertook search areas within 3km, 5km and then 8km for the proposed onshore substations. Further information can be found in the site selection chapter: Example RPS report template. Please refer to Section 4.5.3 of Volume 1, Annex 4.3: Selection and Refinement of Onshore Infrastructure (AS-028).</p>	<p>We know and understand what was done. That does not stop the problem of failure by your Customer to adequately consider the options, resulting in flawed underlying assumptions in respect of the North West area at least. (REP3-072). Nonetheless the Mooir Vannin proposal include a search area of 5km only for the substations. The only proposals shared with us during consultation including the eventual sites were within the 8km search area. [APP-030 & APP033].</p> <p>Moor Vannin have now gone into consultation with a substation location within 5km.</p>	Not Agreed
NFPC.SS.3	Study area	<p>The Applicants have appropriately considered constraints within the study area. See response to Q1.2.1 in the Responses to the Examining Authority's written questions submitted by National Grid Electricity Transmission plc (REP3-088). This provides NGET comments on suggested Hillhouse/ Stanah alternative.</p>	<p>NFPC.SS.3 – the study area was too narrow and made the substation locations a foregone conclusion; the northern Hillhouse alternative and landing point should also have been considered.</p> <p>Nonetheless we do not agree with this approach - it still costs far more at £900m, it still does</p>	Not agreed

Reference Number	Discussion point	Applicants' position	Newton with Clifton and Freckleton Parish Council's Position	Status
		<p>Please also refer to paragraphs 2.31 of The Applicants' Response to Relevant Representations Part 1 – Introduction and thematic responses (PDA-005) relating to site selection and alternatives.</p> <p>The Applicants also have responded to the suggestion of a connection at Hillhouse in the Applicants response to Hearing Action Points: ISH1 6, 8, 9, 19, 26 & 28 (REP3-041).</p> <p>The Applicants followed an iterative route planning and site selection process that led to the identification of the landfall. This process, outlined in ES Volume 1, Chapter 4: Site Selection and Consideration of Alternatives (AS-026) and ES Volume 1, Annex 4.1: Selection and refinement of cable landfall (APP-031).</p> <p>The Landfall Area of Search was defined based on the location of the Generation Assets and the National Grid Substation at Penwortham as guided by the principles outline in section 4.2 of ES Volume 1, Annex 4.1: Selection and refinement of cable landfall (APP-031). The Landfall Area of Search extended from the south of Blackpool to Formby.</p>	<p>massive environmental damage, and the alternative is welcomed by local stakeholders as a welcome investment into a brownfield site. We also know that the approach is inconsistent with the Electricity Act which requires the lowest overall cost solution, the NPS and NESO Plans, which prioritise the use of existing transmission infrastructure above new cable connections. If the basic start assumption was wrong, which in this case can be proven, then the whole assessment at the HNDR is potentially flawed.</p> <p>Yet we have been consistently told that there was no alternative to landfall at Blackpool Airport. The Landfall search area above would have allowed for a route via Hillhouse and Stanah. Yet it was apparently not considered. Response to applicants also submitted at Deadline 4.</p>	
NFPC.SS.4	Assessment methodology	<p>The Applicants have followed a robust and comprehensive site selection and design process, including the use of BRAG methodology as a standard site selection tool. The BRAG methodology was also used for selection of landfall and for the onshore substation in the Preliminary Environmental Information Report (PEIR) and presented at statutory consultation. Therefore the methodology was consulted on prior to the submission of the application.</p> <p>See Table 4.7 and 4.14 of Volume 1, Annex 4.3: Selection and Refinement of the Onshore Infrastructure (AS-028). This specifically provides information about the factors considered under each BRAG criteria. The Applicants can clarify that no weighting on BRAG criteria was applied.</p>	NFPC.SS.4 – there is not enough information available about how the factors in the BRAG methodology were weighted, if at all. Factors were not discussed or consulted upon and weighed to support the eventual conclusion.	Not agreed

Reference Number	Discussion point	Applicants' position	Newton with Clifton and Freckleton Parish Council's Position	Status
NFPC.SS.5	Assessment methodology	<p>The site selection and design process were driven by the Holistic Network Design Review (HNDR), environmental, social and technical constraints, and consultation with stakeholders.</p> <p>See response to Q1.2.1 in the Responses to the Examining Authority's written questions submitted by National Grid Electricity Transmission plc (REP3-088). This provides NGET comments on HNDR process.</p> <p>Please also refer to paragraphs 2.31 of The Applicants' Response to Relevant Representations Part 1 – Introduction and thematic responses (PDA-005) relating to site selection and alternatives.</p> <p>The Applicants also have responded to comments about HNDR in the Applicants response to Hearing Action Points: ISH1 6, 8, 9, 19, 26 & 28 (REP1-039).</p>	<p>Whilst the parish councils agree the Applicants were given their connection point by the National Grid into Penwortham, we believe there are other alternative more suitable connection points available. Please refer to [REP4-166, REP3-100] for more information.</p>	Not agreed
NFPC.SS.6	Assessment methodology	<p>The Applicants have appropriately considered constraints in the siting of the onshore export cable, onshore substation, and the 400 kV Cable Corridor. These are set out in Volume 1, Annex 4.3: Selection and refinement of onshore infrastructure (APP-033).</p> <p>See Table 4.7 of Volume 1, Annex 4.3: Selection and Refinement of the Onshore Infrastructure (AS-028). This specifically provides information about the factors considered under each BRAG criteria for substation site selection.</p> <p>The Applicants undertook search areas within 3km, 5km and then 8km for the proposed onshore substations. Further information can be found in the site selection chapter: Example RPS report template. Please refer to Section 4.5.3 of Volume 1, Annex 4.3: Selection and Refinement of Onshore Infrastructure (AS-028).</p>	<p>NFPC.SS.6 – the onshore substation constraints were not given the correct weighting.</p> <p>There was a decision to only allow for four areas for the substations search area, which conveniently came to a single decision for location between Newton and Freckleton. This location include the Green Belt, and the Area of Separation between Newton and Kirkham, which are meant to be protected.</p> <p>The criteria for the choice of substation siting was not agreed nor consulted upon. No weighting was used. Important factors such as the impact on residents, preferred use of brownfield sites, impact on food security and impact on heritage assets were ignored. There was no ornithology survey for Zone 1 and feedback from local residents, and previous evidence of a range of rare bird and other species was not considered. Evidence of pink</p>	Not agreed

Reference Number	Discussion point	Applicants' position	Newton with Clifton and Freckleton Parish Council's Position	Status
			<p>footed geese was ignored for Zone 1 but used to support avoiding other zones.</p> <p>Three of the four proposed sites were known to fail the set criteria making the end decision a fixed one, rather than one for engagement.</p> <p>The choice of an 8km search zone was not explained and previous schemes (Norfolk Vanguard) only had a 3km zone. The proposed substation sites are conveniently on the edge of the 8km search zone.</p> <p>We also know that Mooir Vannin have a different proposed landing position on the Fylde coast., to the north of Blackpool. This completely avoids the offshore areas of sensitivity, suggesting there was an alternative!</p>	
NFPC.SS.7	Assessment methodology	<p>Siting of proposed onshore substations – The Applicants believe the test for very special circumstances has been met.</p> <p>The Applicants maintain that the Transmission Assets benefit from the presumptions given to Critical National Priority (CNP) Infrastructure, set out in paragraphs 4.2.16 and 4.2.17 of EN-1, which state that the “Secretary of State will take as the starting point for decision making that such infrastructure is to be treated as if it has met any tests which are set out within the NPSS, or any other planning policy, which requires a clear outweighing of harm, exceptionality or very special circumstances” provided that the mitigation hierarchy requirements set out in paragraph 3.3.63 of EN-1 have been met (as set out in Section 3.4.4.15 of the Planning Statement (REP1-032). This includes the requirements for very special circumstances to justify development in the Green Belt.</p> <p>The Applicants provided a Green Belt Technical Note (REP3-069) at Deadline 3 that pulls together a case on green belt and</p>	<p>NFPC.SS.7 – the serious harm from development in the green belt should still count significantly against granting development consent.</p> <p>I think we would disagree completely. There is no need to use any green belt, if you had used sensible assumptions plus had you been realistic about required areas, there were other sites possibly suitable which we know have not been considered, e.g. the industrial land to the west of Preston Dock. Adoption of the “alternative” removes all the objections in their entirety and saves money!</p> <p>Covered in more details in our Deadline 4 response on the Green Belt (REP4-167 Item 2d</p>	Not agreed

Reference Number	Discussion point	Applicants' position	Newton with Clifton and Freckleton Parish Council's Position	Status
		<p>additional clarification on the site selection and alternatives and the nature of harm arising from the Transmission Assets.</p> <p>The report concludes that the Transmission Assets will result in limited overall harm in the local Green Belt area by virtue of the Green Belt being sufficiently robust to retain function and purpose; that 'any other harm' is limited based on judgements relating to visual impact (including reference to visual openness) and landscape character change; and that adequate design measures mitigate the effects where reasonably practicable; and that the Very Special Circumstances (VSC) outweigh any harms arising. notwithstanding the fact that there are clear and robust very special circumstances that substantially outweigh the harm to the Green Belt, the Transmission Assets comprise Critical National Priority Infrastructure (and the qualifying mitigation hierarchy has been appropriately applied) and as such the Green Belt tests are met.</p>	<p>& REP4-166). The Applicants' response relating to the proposed alternative power transmission route is predicated on the proof of Very Special Circumstances for the proposed development on Green Belt land.. However, despite these vigorous assertions, the Applicants and NGET have both failed to produce the facts that would be available had a full assessment been carried out.</p> <p>Such information is totally lacking, as we have previously observed.</p>	

1.4.3 Consultation

Table 1.6: Agreement Log between the parties on Consultation

Reference Number	Discussion point	Applicants' position	Newton with Clifton and Freckleton Parish Council's Position	Status
Other Documents and Plans				
NFPC.C.1	Non-statutory consultation	<p>The Applicants have undertaken appropriate consultation in line with the Planning Act 2008. Further information on how this consultation was delivered can be found in the consultation report (APP-170).</p> <p>Applicants submitted email notification to Newton with Clifton Parish Council on 2 November 2022 of the launch of the non-stat consultation.</p> <p>Copy of email sent via mailchimp provided below:</p> <p>Non-statutory consultation on proposed wind farms in the Irish Sea.</p> <p>The notification provided a link to consultation materials i.e. the consultation brochure via the consultation website, which contained information regarding the proposed Transmission Assets infrastructure, as well as information on how to submit feedback.</p>	<p>The Applicants have listed engagement in Table 1.2 in this SoCG, for which the parish councils would like to note a level of disagreement. The parish councils' position is that the 2022 consultation was misleading and inadequate. No comment in a written form was requested. We were given to understand that the event was distribution of information, not that much was forthcoming</p> <p>Email notification makes no reference to cabling route or substation. As such it misrepresents the potential impact on local communities and minimises the opportunity for comment by stakeholders and residents unaware of that impact.</p> <p>Newton with Clifton Parish Council was not included in the first non-statutory consultation between 2nd November and 13th December. Two members of the parish council did attend an event for landowners and reported this back to the Parish Council, but the Parish Council were not invited.</p> <p>The parish councils feel as if some very dangerous assumptions were made in the process. It certainly did not account for anyone not familiar with the process. One of the skills in being a good listener is to ensure the persons the comments are addressed</p>	Not agreed

Reference Number	Discussion point	Applicants' position	Newton with Clifton and Freckleton Parish Council's Position	Status
			to have understood correctly. I don't think that step ever occurred and definitely not if its buried in documentation. Since then, I think we learned that verbal feedback is not heard, but written feedback might be acted upon when it suits.	
NFPC.C.2	Non-statutory consultation	<p>The Applicants have undertaken appropriate consultation with Newton with Clifton and Freckleton Parish Council in 2023 in line with Planning Act 2008.</p> <p>The Applicants note that this non-statutory consultation was a joint consultation alongside the Morecambe and Morgan Generation statutory consultations and considered venue appropriate across all three projects.</p> <p>The consultation events were one of many ways to engage in the consultation. An online webinar was set up for those unable to attend an in-person event. Additionally, the project team were available to answer any queries via email and phone.</p> <p>The Applicants made clear in consultation materials on how the community and stakeholders were able to respond to the consultation, should they chose to do so at the time.</p> <p>The 2023 non-stat consultation leaflet provided sufficient information on key refinements that had been made since the 2022 non-stat consultation.</p> <p>The project team were also available throughout the consultation to provide assistance and answer any queries and note</p>	<p>The parish councils note the contrast with Mooir Vannin is marked. There was an on-line briefing all affected Parish Councils before the non-statutory consultation. There is an event in NEWTON WITH CLIFTON as part of the non-statutory consultation. Mooir Vannin have agreed to amendments to their documents used to promote and inform their events covering the alternative route. They have agreed to engage Parish Councils in the development of their Statement of Community Engagement and to provide resources (not money) to enable Parish Councils to participate fully in the statutory process. Finally they have agreed to try and facilitate a meeting of affected Parishes with OFGEM to discuss the alternative route. No events were held in the area affected by the transmission route. Only Lytham was covered. Again this represents a deliberate attempt to minimise awareness and opportunity for comment by local stakeholders and residents. The refusal to hold an event in the area most affected by the proposed substations is telling. The leaflets were no consistently distributed and were misleading in terms of the information provided to local residents.</p> <p>Again the applicants deliberately avoided an event in the area affected by the cabling route and substations. When requested they flatly refused to reconsider their plans. This was again a deliberate attempt to minimise awareness of the proposals</p>	Not agreed

Reference Number	Discussion point	Applicants' position	Newton with Clifton and Freckleton Parish Council's Position	Status
		that a member of the project team attended a parish council meeting at their request (see Table 1.2 for more information).	<p>and the ability of local stakeholders and residents to respond meaningfully.</p> <p>The advice given at each consultation as to how to respond was not adequate. No member from Freckleton Parish Council was advised that written comment was "required".</p> <p>What little data was available within the documents made available was extremely hard to extract - probably deliberately - and required someone with a lot of time to devote, familiarity with procedural activity and a decent computer system to handle it all.</p>	
NFPC.C.3	Non-statutory and statutory consultations	<p>The Applicants undertook an extensive advertising campaign to promote the consultations, as set out in the Consultation report and supporting annexes. Please refer to the consultation report and supporting annexes for more information.</p> <p>The Applicants issued consultation materials by Royal Mail post to ensure timely delivery to the maildrop area.</p>	The mail shots were included with other advertising, buried inside - most went to waste without opening! Many were never circulated.	Not agreed
NFPC.C.4	Non-statutory and statutory consultations	<p>The Applicants had regard to equal opportunities and diversity throughout its consultation process, ensuring the consultations was accessible to all.</p> <p>The Applicants consulted with Seldom Heard Groups and provided a service to produce in other forms, such as braille.</p>	Given the comment above, that is debatable! It was definitely not accessible to all. Even late on, many people were surprised to learn of the project - for which FACTS are to be congratulated. It was also recognised that we needed teamwork between all affected Towns, Parishes and other interested public bodies	Not agreed

Reference Number	Discussion point	Applicants' position	Newton with Clifton and Freckleton Parish Council's Position	Status
		<p>Deposit locations were also set up for those who do not have internet access or access to a computer.</p> <p>All consultation events were held at publicly accessible locations.</p> <p>Further information can be found in the consultation report (APP-170).</p>		
NFPC.C.5	Statutory consultation	<p>The Applicants have met with the requirements set out in section 47(7) of the Planning Act 2008, and consultation was carried out in accordance with the proposals set out in the Statement of Community Consultation (SoCC).</p> <p>Please refer to section 4 of the consultation report (APP-170).</p>	<p>Table 1.6 point 3 and others see above for our sustained criticism of the consultation approach which included misleading leaflets, failure to hold local events initially and continuing failure to understand that there is this consultation taking place, undermining claims that the consultation was adequate, and with implications for equal opportunity and diversity.</p>	Not agreed
NFPC.C.6	Statutory consultation	<p>The Applicants have undertaken appropriate statutory consultation with Newton with Clifton and Freckleton Parish Councils, and fulfilled their statutory obligations under sections 42, 47 and 48 of the Planning Act 2008.</p>	<p>We remain of the view that the consultation was inadequate, a view shared by Fylde BC and Lancashire CC. Local residents were not made aware of the impact of the proposals and therefore not given an opportunity to comment or contribute.</p> <p>That the ExA has accepted the application is noted. That doesn't change our views, expressed again on the failure to engage local residents affected by the proposed changes on Leach Lane before submission, that the consultation has been inadequate, and that view remains shared by the two Councils most involved - Fylde BC and Lancashire CC.</p>	Not agreed
NFPC.C.7	Statutory consultation	<p>The Applicants have met the requirements of both legislation and guidance regarding pre-</p>	<p>We remain of the view that the consultation was inadequate, a view shared by Fylde BC and</p>	Not agreed

Reference Number	Discussion point	Applicants' position	Newton with Clifton and Freckleton Parish Council's Position	Status
		application consultation. A Consultation Compliance Checklist is provided within Annex E1.2 (document reference APP-172).	Lancashire CC. Local residents were not made aware of the impact of the proposals and therefore not given an opportunity to comment or contribute.	

1.4.4 Onshore Ecology and Nature Conservation

Table 1.7: Agreement Log between the parties on Onshore Ecology and Nature Conservation

Reference Number	Discussion point	Applicants' position	Newton with Clifton and Freckleton Parish Council's Position	Status
EIA				
NFPC.OE.1	Policy and Planning	<p>The Application has identified and considered the plans and policies relevant to onshore ecology and nature conservation.</p> <p>With regards to the interpretation of permanent land take, the Applicants will respond to REP4-167 at deadline 5 here: Deadline 5 response</p>	<p>Covered in our Deadline 4 response which includes reference to the additional impact on onshore ecology of non-sequential construction. I think we have seen that some plans and policies may have been classed as too difficult - see for example NPS EN1 Para 5.5.41.</p> <p>Others are subject to "interpretation" e.g. the definition of permanent land take in relation to the trenching activities, which will see land out of use for in excess of 2 years, so that should be considered as permanent. See REP4-167 for comments in detail.</p> <p>Having considered the deadline 5 response the parish council view remains that the sequential vs concurrent construction assessment remains inadequate.</p>	Not agreed

Reference Number	Discussion point	Applicants' position	Newton with Clifton and Freckleton Parish Council's Position	Status
NFPC.OE.2	Surveys	<p>The scope of the onshore ecology surveys (including species, survey coverage and survey effort) was appropriate. The surveys were undertaken in accordance with the appropriate methodologies.</p> <p>Please see the Applicants response to RR-0277.6 in 3.2 The Applicants' Response to Relevant Representations Part 2 - Affected parties and statutory consultees (PDA-007).</p> <p>The Applicants note the parish councils' position; however, this does not refer to onshore ecology and nature conservation matters. The Applicants would defer the parish councils to APP-068 Volume 3, Chapter 1: Geology, hydrogeology and ground conditions for further information on geological sequence across the proposed onshore route.</p>	<p>It is recognised that work has been undertaken, but there are areas of concern that have been raised regarding the overall completeness.</p> <p>The demand for bore samples to be taken every 100m is indicative of not having characterised the ground over which the development is proposed. The understanding that the Fylde is not terra firma in many places is clearly not present. It moves continuously, rising and falling with each tide as a minimum. The layer, characterised as 'running sand' lies under much of the Fylde and you will find that if you enter this region, it will continuously fill with water and the sand will tend to run in and fill the excavation.</p>	Not agreed
NFPC.OE.3	Baseline environment	<p>Sufficient site-specific and desktop data has been collated to appropriately characterise the baseline for onshore ecology and nature conservation to inform the EIA.</p> <p>Please see the Applicants response to RR-0277.6 in 3.2 The Applicants' Response to Relevant Representations Part 2 - Affected parties and statutory consultees (PDA-007).</p> <p>Please also refer to NFPC.OE.2 for further information on the Applicants position.</p>	<p>It is recognised that work has been undertaken, but there are areas of concern that have been raised regarding the overall completeness.</p> <p>The demand for bore samples to be taken every 100m is indicative of not having characterised the ground over which the development is proposed. The understanding that the Fylde is not terra firma in many places is clearly not present. It moves continuously, rising and falling with each tide as a minimum. The layer, characterised as 'running sand' lies under much of the Fylde and you will find that if you enter this region, it will continuously fill with water and the sand will tend to run in and fill the excavation.</p>	Not agreed

Reference Number	Discussion point	Applicants' position	Newton with Clifton and Freckleton Parish Council's Position	Status
NFPC.OE.4	Baseline environment	<p>The Applicants have adequately characterised the baseline environment for onshore ecology and nature conservation.</p> <p>Please see the Applicants response to RR-0277.6 in 3.2 The Applicants' Response to Relevant Representations Part 2 - Affected parties and statutory consultees (PDA-007).</p> <p>Please also refer to NFPC.OE.2 for further information on the Applicants position.</p>	<p>It is recognised that work has been undertaken, but there are areas of concern that have been raised regarding the overall completeness.</p> <p>The demand for bore samples to be taken every 100m is indicative of not having characterised the ground over which the development is proposed. The understanding that the Fylde is not terra firma in many places is clearly not present. It moves continuously, rising and falling with each tide as a minimum. The layer, characterised as 'running sand' lies under much of the Fylde and you will find that if you enter this region, it will continuously fill with water and the sand will tend to run in and fill the excavation.</p> <p>the Applicants have not characterised the baseline correctly with respect to BNG; the entirety of the onshore cable routes should have been included in the baseline habitat calculation as it will clearly not be restored within two years of harm; the Applicants should be required to at least declare what biodiversity loss or gain will occur using the biodiversity metric properly, even though it is not yet a statutory requirement, if not actually commit to providing 10% BNG as many other DCOs have had to</p>	Not agreed
NFPC.OE.5	Study area	<p>The Applicants note the parish councils' position; however, this does not refer to onshore ecology and nature conservation matters.</p> <p>The EIA study area is appropriate for the receptors, sites and impacts assessed.</p>	<p>It is recognised that work has been undertaken, but there are areas of concern that have been raised regarding the overall completeness.</p> <p>The demand for bore samples to be taken every 100m is indicative of not having characterised the ground over which the development is proposed. The understanding that the Fylde is not terra</p>	Not agreed

Reference Number	Discussion point	Applicants' position	Newton with Clifton and Freckleton Parish Council's Position	Status
		<p>Please see the Applicants response to RR-0277.6 in 3.2 The Applicants' Response to Relevant Representations Part 2 - Affected parties and statutory consultees (PDA-007).</p> <p>Please also refer to NFPC.OE.2 for further information on the Applicants position.</p>	<p>firma in many places is clearly not present. It moves continuously, rising and falling with each tide as a minimum. The layer, characterised as 'running sand' lies under much of the Fylde and you will find that if you enter this region, it will continuously fill with water and the sand will tend to run in and fill the excavation.</p>	
NFPC.OE.6	Project design envelope	<p>The EIA chapter has identified, described and assessed the maximum design scenario for the EIA.</p> <p>With regards to the parish council's representation submission, the Applicants will respond to REP4-167 at deadline 5: Deadline 5 response</p>	<p>The parish councils submitted a representation regarding this topic at Deadline 4. (REP4-167).</p>	Not agreed
NFPC.OE.7	Assessment methodology	<p>The sensitivity of the onshore ecology and nature conservation receptors has been correctly identified and sufficiently described within the EIA.</p> <p>With regards to the parish councils representation submission, the Applicants will respond to REP4-167 at deadline 5.</p>	<p>The parish councils submitted a representation regarding this topic at Deadline 4. (REP4-167).</p>	Not agreed
NFPC.OE.8	Assessment methodology	<p>The assessment methodology for onshore ecology and nature conservation is appropriate.</p> <p>Please see the Outline Wildlife Hazard Management Plan (REP3-065) which forms an appendix to the Outline Ecological Management Plan. The document supports ongoing discussions between the Applicants, Blackpool Airport and BAE Systems ("BAE") with regards to the safeguarding of Blackpool Airport and</p>	<p>NFPC.OE.8 – the ecology assessment was inadequate as the risk of bird strike from the two aviation facilities was not taken into account.</p> <p>Those discussions remain deadlocked and expose a fundamental flaw in the application which results from it being prematurely rushed through. The issues with BAE Systems should have been discussed in advance of the application being submitted. The applicants in their rush to avoid BNG have ended up with a fundamental and irresolvable dilemma around</p>	Not agreed

Reference Number	Discussion point	Applicants' position	Newton with Clifton and Freckleton Parish Council's Position	Status
		<p>Warton Aerodrome associated with potential bird strike mitigation.</p> <p>The Applicants continue to work with Blackpool Airport and BAE Systems and consider that the process secured via Requirement 12 of Schedules 2A and 2B of the draft DCO (REP3-009) and within the Outline Wildlife Hazard Management Plan demonstrates that any potential impacts to Warton Aerodrome and Blackpool Airport can be mitigated appropriately in line with the management measures already in place and operating at the Aerodrome and airport.</p>	<p>both supporting environmental net gain and denying it for BAE Systems.</p> <p>The parish note that BAE Systems are not the only body concerned about the Birdstrike Issue. This is a major concern to those PCs and TCs that lie under the possible flight paths, as follows:</p> <ol style="list-style-type: none"> 1) When a strike occurs, there may be damage to the aircraft, which hopefully can land safely with no further concern. 2) If the aircraft or crew are damaged, then control may be lost, in which case the crew may eject and land safely, but the aircraft trajectory will be uncertain and may result in a crash on land or at sea. 3) This raises a third party risk of death to those on the ground. 4) Anything that increases this risk knowingly has to be prevented 	
NFPC.OE.9	Cumulative effects assessment methodology	<p>The list of projects screened into the Cumulative Effects Assessment (CEA) in the EIA is appropriate.</p> <p>The Applicants will respond to REP4-167 at deadline 5.</p>	<p>The parish councils submitted a representation regarding this topic at Deadline 4. (REP4-167).</p> <p>We note the ExA's attempt to seek a shorter gap between projects and the absolute refusal of the Applicants to consider this (refer to recording 3 of ISH3 (EV8-006) from 13:49:20 to 14:10:10).</p>	Not agreed
NFPC.OE.10	Assessment of the effects from the Transmission Assets alone	<p>There will be no significant residual effects on nationally designated ecological sites for the impacts from the Transmission Assets alone.</p> <p>The Applicants would refer the parish councils to Volume 3, Chapter 4: Onshore and intertidal</p>	<p>The transmission assets will cause permanent damage, even if locally, which will permanently change the utility of the land taken for these. What happens in a paper world usually bears little resemblance to reality - hence there is a risk.</p>	Not agreed

Reference Number	Discussion point	Applicants' position	Newton with Clifton and Freckleton Parish Council's Position	Status
		ornithology (APP-090) for information on 'functionally linked land'. The Applicants will respond to REP4-167 at deadline 5.	The parish councils have not seen a plan of what 'functionally linked land' to the designated sites is affected by the project to be able to give an opinion on this. The parish councils submitted a representation regarding this topic at Deadline 4. (REP4-167).	
NFPC.OE.11	Assessment of the effects from the Transmission Assets alone	There will be no significant residual effects on Local Nature Reserves, Ecological Networks and the majority of Biological Heritage Sites (BHS) for the impacts from the Transmission Assets alone. However, significant residual effects are predicted at the Mill Brook Valley BHS.	The parish councils submitted a representation regarding this topic at Deadline 4. (REP4-167).	Not agreed
NFPC.OE.12	Assessment of the effects from the Transmission Assets alone	There will be no significant residual effects on priority habitats, ancient woodland or veteran trees for the impacts from the Transmission Assets alone. However, significant residual effects are predicted for impacts on good quality semi-improved grassland. The Applicants will respond to REP4-167 and REP-136 at deadline 5.	The parish councils submitted a representation regarding this topic at Deadline 4. (REP4-167). This is guaranteed and will reduce that land to lower grade after the work. One wonders if the planned construction technique is actually appropriate to this type of landscape? It causes more damage than an overhead cable! As well as being far more costly, according to NESO. Fylde's reaction regarding trees is of significance. The area is a lower density tree population, therefore individual trees have the potential to have increased significance and need to be treated accordingly (See REP4-136)	Not agreed
NFPC.OE.13	Assessment of the effects from the Transmission Assets alone	There will be no significant residual effects on protected species for the impacts from the Transmission Assets alone.	The parish councils consider non-sequential construction would have a larger impact to protected species.	Not agreed

Reference Number	Discussion point	Applicants' position	Newton with Clifton and Freckleton Parish Council's Position	Status
NFPC.OE.14	Assessment of the effects from the Transmission Assets cumulatively with other projects	<p>The Applicants note that any effects from concurrent construction is different to cumulative effects with other projects. However, both scenarios have been assessed as part of our Environmental Statement.</p> <p>There will be no significant effects on the majority of onshore ecology and nature conservation receptors for the impacts from the Transmission Assets when considered cumulatively with other projects. However significant effects are predicted for the Mill Brook Valley BHS and good quality semi-improved grassland.</p>	The parish councils consider non-sequential construction would have a larger impact to protected species.	Not agreed
NFPC.OE.15	Mitigation and monitoring	<p>The mitigation measures and monitoring outlined in Volume 3, Chapter 3: Onshore Ecology and Nature Conservation (APP-075), the Commitments Register (REP2-010) and the Outline Ecological Management Plan (REP2-018) are appropriate and will ensure significant effects are avoided.</p> <p>The Applicants will respond to REP4-167 and REP-136 at deadline 5.</p>	The parish councils position is presented in our Deadline 4 representation. In addition our response at Deadline 4 (REP4-167) makes clear the fundamental conflict between meeting ecological and environmental concerns and those of BAE Systems in operating a defence regulatory compliant airfield at Warton.	Not agreed
Other Documents and Plans				
NFPC.OE.16	Outline management plans	The measures set out in the Outline Ecological Management Plan (REP2-018) are secured in the draft DCO (AS-004) and are appropriate with regard to proposed mitigation measures and monitoring.	The parish councils consider non-sequential construction would have a larger impact to protected species.	Not agreed

1.4.5 Historic Environment

Table 1.8: Agreement Log between the parties on Historic Environment

Reference Number	Discussion point	Applicants' position	Newton with Clifton and Freckleton Parish Council's Position	Status
EIA				
NFPC.HE.1	Study area	<p>The EIA study area is appropriate for the impacts and receptors assessed.</p> <p>The Applicants' position regarding the potential location of Quaker burial grounds is set out in Note 88 in The Applicants' Hearing Summary of the Issue Specific Hearing: Day 2 (Rev F01) (REP1-035). The Applicants have provided adequate mitigation in the form of avoidance and through the use of trenchless technology. Supporting figures which demonstrate this approach are presented in Annex 5.9 to the Applicants' response to Hearing Action Points ISH 50 (Rev F01) (REP1-045).</p> <p>Lancashire County Council has confirmed that the potential Quaker burial grounds would not be impacted by the construction of the Transmission Assets due to the mitigation measures (avoidance and the use of trenchless technology). This confirmation is set out in paragraph 2.21 of Lancashire County Council's Post-hearing submissions including written submissions of oral cases (REP4-136).</p>	<p>Please refer to REP4-167. Quakers' Wood In addition to all the other published evidence, there are concerns that the Burial Fields across the road from the Burial Ground have not been checked, especially as we have the evidence of the 1838 Tithe plot which indicates that it was in use for burials. We understand that the majority were in these fields, rather than the Burial Ground itself where the gravestones were situated.</p>	Not agreed
NFPC.HE.2	Surveys	<p>The survey approach is appropriate for the site, impacts and receptors assessed. The site-specific surveys have been undertaken in accordance with agreed methodologies.</p>	<p>We have received an email from the Preston Quakers, which says Quaker trustees have written to Morcom and Morgan regarding protocols, if any exhumations were contemplated. We know from your message the site was being investigated by Oxford Archaeology North. We</p>	Not agreed

Reference Number	Discussion point	Applicants' position	Newton with Clifton and Freckleton Parish Council's Position	Status
		Please also refer to the Applicants position under NFPC.HE.1 for further information regarding surveys around Quaker Wood burial ground.	are unaware of any direct communications to us from Morgan and Morecambe or Oxford Archaeology North, so we think they should be kept informed of anything found.	
NFPC.HE.3	Surveys	<p>The approach and contents of the Desk Based Assessment is appropriate for the wider assessment.</p> <p>The survey and assessment has been undertaken in line with guidance as agreed with the LCC HET and Historic England (see Lancashire County Council Statement of Common Ground (REP3-044)).</p> <p>Further programme of surveys as indicated in the Outline Onshore and Intertidal WSI (APP-214) to be completed. This is ongoing and will carry on through the discharge of condition post consent with the implementation of the detailed WSIs in line with requirement 11 of the draft DCO.</p> <p>See the document 'Applicants' response to Deadline 3 submissions from Statutory Consultees and other organisations, Q11.1.6(d) in Table 2.7: REP3-083 – Historic England's Responses to ExQ1, submitted at Deadline 4</p> <p>The Applicants also submitted a comparison of the trial trenching approach of the Transmission Assets against that taken by other DCO projects. This was submitted at Deadline 4 (S_D4_9.6_MMTA_Annex 9.6 to Applicants response to Hearing Action Point ISH2 48_F01)</p> <p>Information regarding the 'lost' settlement of Kilgrimol is set out in ES Volume 3, Annex 5.1:</p>	<p>Given that South Fylde was a swamp with many inlets and has been occupied since pre-Roman times, including Vikings who were resident (as observed by place names, this is a very bold claim.</p> <p>We have identified possible further issues, such as Kilgrimol. See REP4-167. Desk based surveys are only as good as the start data, hence they can be highly distorted without sufficient local input on the ground.</p> <p>Also, this shore is the site of much flotsam and jetsam resulting from the wreck of the Mexico, of which much was recovered but there may still be remnants present. This remains the heaviest loss of life to the Lifeboat service in the UK, when 27 crew members of 4 lifeboats were lost in the attempted rescue.</p>	Not agreed, but not material

Reference Number	Discussion point	Applicants' position	Newton with Clifton and Freckleton Parish Council's Position	Status
		<p>Historic environment desk-based assessment (APP-097).</p> <p>The Applicants have undertaken an archaeological survey of the intertidal zone within the Order Limits for the Transmission Assets. The results are set out in ES Volume 3, Annex 5.3: Intertidal archaeological survey report (APP-100).</p> <p>A programme of pre-construction archaeological investigation, including work within the intertidal zone, is set out in the Outline Onshore and Intertidal Written Scheme of Investigation (Rev F02) (REP3-026). This has been accepted as fit for purpose by statutory consultees including Lancashire County Council and Historic England.</p>		
NFPC.HE.4	Baseline environment	<p>Sufficient primary and secondary data (including site-specific surveys) have been collated to appropriately characterise the onshore archaeology and heritage baseline environment for the purposes of EIA within Volume 3, Chapter 5: Historic environment (APP-096).</p> <p>See also the Applicants response to Exa Q11.1.1, Q11.1.2 and Q11.1.4 submitted at Deadline 3 (REP3-056).</p> <p>The Applicants' have prepared a thorough review of the known and potential archaeology of the area. This is set out in ES Annex 5.1: Historic environment desk-based assessment (APP-097) which has been accepted as fit for purpose by statutory consultees including</p>	<p>After discussion with our local historian Peter Shakeshaft regarding the investigation of Heritage Assets, there are the following further questions.</p> <p>1. Evidence of Neolithic to Saxon & Viking Occupation and Farming Methods a. In the past there was evidence uncovered in the re-design of the A585 junction at Windy Harbour of both Neolithic & Mesolithic Occupation in that area. There is a strong likelihood of similar activity all across the Fylde, with much as yet unidentified. This possibility was discussed during the ISH2 hearings. (Reference the Oxford Archaeology North report – on excavations at A585 junction) b. Preston Dock – Bronze Age artefacts c. Digging of the Dock at Preston, close to the crossing point of the Ribble by the cable route, revealed Bronze Age artefacts within the dig. This possibility was discussed during the ISH2 hearings. d. Viking & Saxon The Fylde was a known base for activity by</p>	Not agreed, but not material

Reference Number	Discussion point	Applicants' position	Newton with Clifton and Freckleton Parish Council's Position	Status
		<p>Lancashire County Council and Historic England.</p> <p>Additional fieldwork has been undertaken in the form of geophysical survey and trial trenching. The results of the programme of geophysical survey are described in ES Annex 5.2: Onshore archaeological geophysical survey report (APP-098 and APP-099). The results of the programme of trial trenching are described in ES Annex 5.6 (Rev F02) (REP3-016).</p> <p>A programme of pre-construction archaeological investigation, including further trial trenching, is set out in the Outline Onshore and Intertidal Written Scheme of Investigation (Rev F02) (REP3-026). This has been accepted as fit for purpose by statutory consultees including Lancashire County Council and Historic England.</p>	<p>both Saxon and Viking peoples who undoubtedly knew their way around the bogs and waterways of the south Fylde area. Very little is known, definitely, but there was a route that crossed the Fylde from the north to south, to a ford/ferry situated at Naze Point. e. Eeka Lane / Dow Brook Eeka is a corruption of the local name High Carr, where Carr is the old word for a bog, This gives a clue to the type of country being dealt with. The extension of Eeka Lane is a footway which crosses the Dow Brook (an EA designated main river tributary to the Ribble RAMSAR area) via a "clap" bridge, i.e. laid flat stones – a common primitive method of bridging. The area is possibly of note for the evidence of early agricultural practices of row & furrow farming, which was common across much of the South Fylde.</p>	
NFPC.HE.5	Assessment methodology	<p>The sensitivity and significance of the onshore archaeology receptors has been appropriately and adequately described within Volume 3, Chapter 5: Historic environment (APP-096).</p> <p>See also the Applicants response to Exa Q11.1.1, Q11.1.2 and Q11.1.4 submitted at Deadline 3 (REP3-056).</p> <p>Please also refer to the Applicants position under NFPC.HE.4 for further information.</p>	Please refer to NFPC.HE.4.	Not agreed, but not material
NFPC.HE.6	Assessment methodology	<p>The methodologies used in within Volume 3, Chapter 5: Historic environment (APP-096) are appropriate for assessing the potential impacts the Transmission Assets on onshore archaeology and heritage assets.</p>	Please refer to NFPC.HE.4.	Not agreed, but not material

Reference Number	Discussion point	Applicants' position	Newton with Clifton and Freckleton Parish Council's Position	Status
		<p>Please also refer to the Applicants position under NFPC.HE.4 for further information.</p> <p>See the Applicants response to Exa Q11.1.1, Q11.1.2 and Q11.1.4 submitted at Deadline 3 (REP3-056).</p>		
NFPC.HE.7	Project design envelope	<p>The assessment has appropriately defined the Maximum Design Scenario (MDS) for the purposes of EIA.</p> <p>Please also refer to the Applicants position under NFPC.HE.4 for further information.</p>	Please refer to NFPC.HE.4.	Not agreed, but not material
NFPC.HE.8	Assessment of the effects from the project alone	<p>The potential impacts identified within Volume 3, Chapter 5: Historic environment (APP-096) represent a comprehensive list of the potential impacts in relation to onshore archaeology and heritage assets.</p> <p>See also the Applicants response to Exa Q11.1.1, Q11.1.2 and Q11.1.4 submitted at Deadline 3 (REP3-056).</p> <p>Please also refer to the Applicants position under NFPC.HE.4 for further information.</p>	Please refer to NFPC.HE.4.	Not agreed
NFPC.HE.9	Assessment of the effects from the project alone	<p>The likely significant adverse residual effects (in EIA terms) identified within Volume 3, Chapter 5: Historic environment (APP-096) represent a comprehensive list of the likely significant adverse residual effects on onshore archaeology.</p> <p>See also the Applicants response to Exa Q11.1.1, Q11.1.2 and Q11.1.4 submitted at Deadline 3 (REP3-056).</p>	Please refer to NFPC.HE.4.	Not agreed, but not material

Reference Number	Discussion point	Applicants' position	Newton with Clifton and Freckleton Parish Council's Position	Status
		Please also refer to the Applicants position under NFPC.HE.4 for further information.		
NFPC.HE.10	Assessment of the effects from the project cumulatively with other projects	<p>The likely significant adverse residual effects (in EIA terms) which are predicted to arise from the development of the Transmission Assets cumulatively with other project and plans identified within Volume 3, Chapter 5: Historic environment (APP-096) represent a comprehensive list of the likely significant adverse residual effects on the historic environment.</p> <p>See also the Applicants response to Exa Q11.1.1, Q11.1.2 and Q11.1.4 submitted at Deadline 3 (REP3-056)</p> <p>Please also refer to the Applicants position under NFPC.HE.4 for further information.</p>	Please refer to NFPC.HE.4.	Not agreed, but not material
NFPC.HE.11	Mitigation	The mitigation measures identified in Volume 3, Chapter 5: Historic environment (APP-096) are considered appropriate and adequate for the Transmission Assets.	Please refer to NFPC.HE.4.	Not agreed
Other Documents and Plans				
NFPC.HE.12	Outline Onshore and intertidal Written Scheme of Investigation (WSI)	The Outline Onshore and Intertidal WSI (APP-214) is secured under Requirement 11 of Schedules 2A and 2B of the draft DCO (AS-004) and is considered appropriate with regard to proposed monitoring and management principles.	Please refer to NFPC.HE.4.	Not agreed, but not material

1.4.6 Landscape and Visual Resources

Table 1.9: Agreement Log between the parties on Landscape and Visual Resources

Reference Number	Discussion point	Applicants' position	Newton with Clifton and Freckleton Parish Council's Position	Status
EIA				
NFPC.LVR.1	Policy and planning	<p>The Application has identified and considered the plans and policies relevant to landscape and visual resources.</p> <p>The Applicant reiterates that the submitted visualisations (APP-126) have been prepared in accordance with best practices and guidance, representing the Maximum Design Scenario (MDS). Their purpose is to illustrate the likely scale and proportions of the Transmission Assets at both Year 1 and Year 15, in summer and winter conditions, in support of the assessment reported in Volume 3, Chapter 10: Landscape and Visual Resources (APP-123). These provide an established and widely accepted technique for understanding changes in views and visual amenity.</p> <p>Furthermore, in response to the Examining Authority's First Written Question 13.1.4 (REF), the Applicants submitted at Deadline 3 an <u>indicative</u> 3D illustration of each onshore substation site layout, annotated to show typical structures, equipment and buildings. This aligns with the project description in the EIA and the authorised development defined in the dDCO and mirrors the design used for the photomontages.</p>	<p>The Parish Councils D4 response covers this (REP4-167) -</p> <p>It is telling that even now, well after the non-statutory and statutory consultations, the Applicants still refuse to provide renderings of the substations from meaningful viewpoints. During the consultation period this would have allowed local residents and stakeholders to understand the impact on local communities. During the examination period this would have allowed the ExA also to have that understanding. This is another example of a premature application going through an unsatisfactory consultation process.</p>	Not agreed

Reference Number	Discussion point	Applicants' position	Newton with Clifton and Freckleton Parish Council's Position	Status
		<p>Finally, the Applicants acknowledge that visualisations have inherent limitations, as recognised in the Landscape Institute's Technical Guidance Note 06/19: Visual Representation of Development Proposals (2019). Photographs and graphics are illustrative tools that do not fully replicate human perception and must be interpreted alongside fieldwork observations, which inform the LVIA's conclusions. These limitations are set out in Section A.1.5 of Volume 3, Annex 10.4: LVIA Methodology (APP-127), in line with best practices.</p> <p>On this basis, the Applicants consider that the submitted documentation provides an adequate and proportionate evidence base to understand and assess the likely significant landscape and visual effects of the proposed development.</p>		
NFPC.LVR.2	Surveys	<p>The location of the representative viewpoints are appropriate, and the photographic survey was undertaken in accordance with the appropriate methodologies.</p> <p>Please also refer to NFPC.LVR.1 for the Applicants position on assessments on landscape and visualisation.</p>	Please refer to NFPC.LVR.1	Not agreed
NFPC.LVR.3	Baseline environment	<p>The Applicants have adequately characterised the baseline environment for landscape and visual resources.</p> <p>Please also refer to NFPC.LVR.1 for the Applicants position on assessments on landscape and visualisation.</p>	Please refer to NFPC.LVR.1	Not agreed

Reference Number	Discussion point	Applicants' position	Newton with Clifton and Freckleton Parish Council's Position	Status
NFPC.LVR.4	Study area	The EIA study area is appropriate for the receptors, sites and impacts assessed. Please also refer to NFPC.LVR.1 for the Applicants position on assessments on landscape and visualisation.	Please refer to NFPC.LVR.1	Not agreed
NFPC.LVR.5	Project design envelope	The EIA chapter has identified, described and assessed the maximum design scenario for the EIA. Please also refer to NFPC.LVR.1 for the Applicants position on assessments on landscape and visualisation.	Please refer to NFPC.LVR.1	Not agreed
NFPC.LVR.6	Assessment methodology	The sensitivity of the landscape and visual resources has been correctly identified and sufficiently described within the EIA. Please also refer to NFPC.LVR.1 for the Applicants position on assessments on landscape and visualisation.	Please refer to NFPC.LVR.1	Not agreed
NFPC.LVR.7	Assessment methodology	The assessment methodology for landscape and visual resources is appropriate. Please also refer to NFPC.LVR.1 for the Applicants position on assessments on landscape and visualisation.	Please refer to NFPC.LVR.1	Not agreed
NFPC.LVR.8	Cumulative Assessment Methodology	The list of projects screened into the CEA in the EIA is appropriate. Please also refer to NFPC.LVR.1 for the Applicants position on assessments on landscape and visualisation.	Please refer to NFPC.LVR.1	Not agreed

Reference Number	Discussion point	Applicants' position	Newton with Clifton and Freckleton Parish Council's Position	Status
NFPC.LVR.9	Assessment of the effects from the Transmission Assets alone.	Significant residual effects are predicted on landscape character during the construction and decommissioning phases. However, there will be no significant effects on landscape character during the operation of the Transmission Assets following the establishment of landscape mitigation planting. Please also refer to NFPC.LVR.1 for the Applicants position on assessments on landscape and visualisation.	Please refer to NFPC.LVR.1	Not agreed
NFPC.LVR.9	Assessment of the effects from the Transmission Assets alone.	Significant residual effects are predicted on visual amenity at some viewpoint locations during the construction and decommissioning phases. However, there will be no significant residual visual effects during the operation of the Transmission Assets following the establishment of landscape mitigation planting. Please also refer to NFPC.LVR.1 for the Applicants position on assessments on landscape and visualisation.	Please refer to NFPC.LVR.1	Not agreed
NFPC.LVR.10	Assessment of the effects from the Transmission Assets alone.	There will be no significant effects relating to loss of woodland for the impacts from the Transmission Assets alone. Please also refer to NFPC.LVR.1 for the Applicants position on assessments on landscape and visualisation.	Please refer to NFPC.LVR.1	Not agreed
NFPC.LVR.11	Assessment of the effects from the Transmission Assets	Significant residual effects are predicted on visual amenity during the construction of the onshore cable route for impacts from the	Please refer to NFPC.LVR.1	Not agreed

Reference Number	Discussion point	Applicants' position	Newton with Clifton and Freckleton Parish Council's Position	Status
	cumulatively with other projects	Transmission Assets when considered cumulatively with other projects. However, there will be no other significant residual effects on landscape and visual resources. Please also refer to NFPC.LVR.1 for the Applicants position on assessments on landscape and visualisation.		
NFPC.LVR.11	Mitigation and monitoring	The mitigation measures and monitoring outlined in Volume 3, Chapter 10: Landscape and Visual Resources (APP123), the Commitments Register (AS-030) and the Outline Landscape Management Plan (APP-208) are appropriate and will ensure significant effects are avoided.	Please refer to NFPC.LVR.1	Not agreed
Other Documents and Plans				
NFPC.LVR.11	Outline management plans	The measures set out in the Outline Landscape Management Plan (APP-208) are secured in the draft DCO (AS-004) and are appropriate with regard to proposed mitigation measures and monitoring.	Please refer to NFPC.LVR.1	Not agreed

1.4.7 Hydrology and Flood Risk

Table 1.10: Agreement Log between the parties on Hydrology and Flood Risk

Reference Number	Discussion point	Applicants' position	Newton with Clifton and Freckleton Parish Council's Position	Status
EIA				
NFPC.HFR.1	Policy and Planning	The Application documents have identified and considered the most up-to date plans and policies as relevant to hydrology and flood risk	<p>Our view confirmed by the ExA insistence on detail borehole survey. Applies across the section and see REP4-167.</p> <p>For an area like Fylde, a desk based survey is of limited use. You need to know where the drainage systems are and how they run, As these were mostly installed in between 1750 and 1850, I think you will find records scarce. Plus, many have already been damaged by previous development and we are now seeing the impact on regular basis with increased flash flooding due to both the climate and the drain damage, exacerbated by the EA failing to maintain main rivers properly, as used to be done by landowners - a countrywide problem, but significant here on the Fylde.</p> <p>Your answer highlights the inadequacy of the process. Most of this information needs to be available before your start. There are numerous examples where following this route has lead to massive overspends in completing tasks, due to not understanding the detail properties of the area.</p> <p>I could name the build of Liverpool Airport Runway 27 in the 60's and the Humber Bridge as examples.</p>	Not agreed
NFPC.HFR.2	Surveys	Agreement that desk -based information is adequate to characterise the hydrology and flood risk baseline and that site-specific surveys are not required.	Our view confirmed by the ExA insistence on detail borehole survey. Applies across the section and see REP4-167.	Not agreed

Reference Number	Discussion point	Applicants' position	Newton with Clifton and Freckleton Parish Council's Position	Status
		<p>The Applicants have issued an updated flood risk assessment following the Environmental Agency (EA) updated flood maps in March 2025. The updated flood risk assessment is presented in REP4-020, and no material changes have been identified.</p> <p>The use of desk-based information is in agreement with the Lead Local Flood Authority (LLFA) (see Table 1.5 of Lancashire County Council Statement of Common Ground (REP3-044)). Additional site-specific surveys will be used at detailed design stage for example in the Detailed Code of Construction Practice and the Detailed Operational Drainage Management Plan and for ordinary watercourse consent applications to be made under the Protective Provisions for the LLFA.</p>	The most up to date plans have only just been submitted and show a considerably higher risk of flooding than the previous ones.	
NFPC.HFR.3	Surveys	<p>Sufficient data has been collated to appropriately characterise the hydrology and flood risk baseline environment for the purposes of Environmental Impact Assessment (EIA) within Volume 3, Chapter 2: Hydrology and Flood Risk (APP-070).</p> <p>Please also refer to NFPC.HFR.2 for the Applicants position on surveys.</p>	Please refer to NFPC.HFR.2.	Not agreed
NFPC.HFR.4	Baseline environment	The hydrology and flood risk baseline has been appropriately characterised in Volume 3, Chapter 2: Hydrology and Flood Risk (APP-070).	Please refer to NFPC.HFR.2.	Not agreed

Reference Number	Discussion point	Applicants' position	Newton with Clifton and Freckleton Parish Council's Position	Status
NFPC.HFR.5	Study area	The hydrology and flood risk study area is appropriate for the impacts and the receptors assessed.	Please refer to NFPC.HFR.2.	Not agreed
NFPC.HFR.6	Assessment methodology	The sensitivity and significance of the hydrology and flood risk receptors have been appropriately and adequately described within Volume 3, Chapter 2: Hydrology and Flood Risk (APP-070). Please also refer to NFPC.HFR.2 for the Applicants position on surveys.	Please refer to NFPC.HFR.2.	Not agreed
NFPC.HFR.7	Assessment methodology	The methodologies used within Volume 3, Chapter 2: Hydrology and Flood Risk (APP-070) are appropriate for assessing the potential impacts of the Transmission Assets. Please also refer to NFPC.HFR.2 for the Applicants position on surveys.	Please refer to NFPC.HFR.2.	Not agreed
NFPC.HFR.8	Assessment of the effects from the project alone	No significant residual effects on hydrology and flood risk are predicted to arise from the development of the Transmission Assets. Please also refer to NFPC.HFR.2 for the Applicants position on surveys.	Please refer to NFPC.HFR.2.	Not agreed
NFPC.HFR.9	Assessment of the effects from the project cumulatively with other projects	No significant adverse effects on hydrology and flood risk are predicted to arise from the development of the Transmission Assets cumulatively with other projects and plans. Please also refer to NFPC.HFR.2 for the Applicants position on surveys.	Please refer to NFPC.HFR.2.	Not agreed
NFPC.HFR.10	Mitigation	The mitigation measures outlined in Volume 3, Chapter 2: Hydrology and Flood Risk	Please refer to NFPC.HFR.2.	Not agreed

Reference Number	Discussion point	Applicants' position	Newton with Clifton and Freckleton Parish Council's Position	Status
		(APP-070) are appropriate and will ensure significant effects are avoided.		
Other Documents and Plans				
NFPC.HFR.10	Outline management plans	The CoCP and the accompanying management plans are secured through Requirement 8 of the draft DCO and are appropriate with regard to mitigation measures.	Please refer to NFPC.HFR.2.	Not agreed

1.4.8 Traffic and Transport

Table 1.11: Agreement Log between the parties on Traffic and Transport

Reference Number	Discussion point	Applicants' position	Newton with Clifton and Freckleton Parish Council's Position	Status
EIA				
NFPC.TT.1	Policy and planning	<p>The Application documents have identified and considered the most up-to-date plans and policies as relevant to traffic and transport.</p> <p>Please see Section 7.2 of Volume 3: Traffic and Transport (APP-108) which includes a review of the policy and guidance and provides details of how the application documents have been developed in response.</p> <p>The Applicant will respond to REP4-136 at deadline 5.</p>	<p>See REP4-167 for detail and response from LCC REP4-136 re suitability of proposed routes and accesses. Cumulative effects have yet to be properly accounted for and control of crossings for haul ways remain a cause for concern</p> <p>In addition it remains unclear that the proposals for Leach Lane have been sufficiently explained to local residents including the current consultation on proposed changes. These disenfranchise local residents. TASC has objected to the consultation accordingly and will raise our concerns with the Examining Authority.</p>	Not agreed

Reference Number	Discussion point	Applicants' position	Newton with Clifton and Freckleton Parish Council's Position	Status
		<p>With regards to the Change Request consultation at Leach Lane, as noted in our meeting on the 28 August, should the parish councils receive issues from local residents concerning the consultation, the Applicants advised the parish council for the residents to contact the Applicants directly for assistance. Additionally, sufficient information and plans are available to view on the project website (www.morecambeandmorgan.com/transmission)</p> <p>The outline Construction Traffic Management Plan Rev 03, Section 1.13.3 (REP4-056) sets out a framework for managing highway condition and includes a commitment to enter into a legal agreement (Section 278 Highways Act) with the highway authority to administer and maintain the highway asset. It is anticipated this would include intervention timescales for all highway defects attributable to the Transmission Assets construction traffic.</p>	<p>The choice of routes and access points are not considered to be appropriate. The process of timely resolution to highway damage is not practical. Please refer to REP4-167 for more information.</p> <p>In relation to this point the parish council would like it noted that the parish council view remains that the sequential vs concurrent construction assessment remains inadequate.</p>	
NFPC.TT.2	Surveys	The site-specific surveys for traffic and transport have been undertaken in accordance with appropriate methodologies	Please refer to NFPC.TT.1	Not agreed
NFPC.TT.3	Surveys	Sufficient primary and secondary data (including site-specific surveys) has been collated to appropriately characterise the traffic and transport baseline environment for the purposes of Environmental Impact Assessment (EIA) within Volume 3, Chapter 7: Traffic and Transport (APP-108).	Please refer to NFPC.TT.1	Not agreed
NFPC.TT.4	Baseline environment	The baseline environment for traffic and transport has been appropriately characterised	Please refer to NFPC.TT.1	Not agreed

Reference Number	Discussion point	Applicants' position	Newton with Clifton and Freckleton Parish Council's Position	Status
		in Volume 3, Chapter 7: Traffic and Transport (APP-108).		
NFPC.TT.5	Study area	The traffic and transport study area is appropriate for the impacts and the receptors assessed.	Please refer to NFPC.TT.1	Not agreed
NFPC.TT.6	Assessment methodology	The sensitivity and significance of the traffic and transport receptors have been appropriately and adequately described within Volume 3, Chapter 7: Traffic and Transport (APP-108).	Please refer to NFPC.TT.1	Not agreed
NFPC.TT.7	Assessment methodology	The methodologies used in within Volume 3, Chapter 7: Traffic and Transport (APP-108) are appropriate for assessing the potential impacts of the Transmission Assets.	Please refer to NFPC.TT.1	Not agreed
NFPC.TT.8	Project design envelope	The appropriate Maximum Design Scenario has been used to identify, describe and assess the construction vehicle trip generation, distribution and assignment in Volume 3, Annex 7.5: Construction Vehicle Trip Assumptions (APP-115).	Please refer to NFPC.TT.1	Not agreed
NFPC.TT.9	Assessment of the effects from the project alone	<p>No significant adverse effects on traffic and transport are predicted to arise from the development of the Transmission Assets.</p> <p>Volume 3, Chapter 7: Traffic and Transport of the Environmental Statement (APP-108) contains an assessment of the potential impacts from the Project on traffic and transport receptors. To inform the assessment, the Applicants have undertaken a comprehensive data collection exercise including capturing of baseline traffic flows, speeds, identification of</p>	<p>Please refer to NFPC.TT.1</p> <p>The parish councils believe there will be significant effects on country lanes from large increases in HGVs.</p>	Not agreed

Reference Number	Discussion point	Applicants' position	Newton with Clifton and Freckleton Parish Council's Position	Status
		<p>sensitive receptors and collisions for all highway links within Blackpool Council, Lancashire County Council and National Highways administration areas.</p> <p>The assessment concludes (with the application of mitigation measures) that the residual effects would not be significant in Environmental Impact Assessment (EIA) terms.</p> <p>With regard to the routes that are of constrained width and moss roads, the Applicants are in discussions with Lancashire County Council in regard to these matters and have agreed to include additional measures within an update to the Outline Construction Traffic Management Plan (OCTMP) at Deadline 2 (J5/F02).</p>		
NFPC.TT.10	Assessment of the effects from the project cumulatively with other projects	No significant adverse effects on traffic and transport are predicted to arise from the development of the Transmission Assets cumulatively with other projects and plans.	Please refer to NFPC.TT.1	Not agreed
NFPC.TT.11	Mitigation	The mitigation measures outlined in Volume 3, Chapter 7: Traffic and Transport (APP-108) are appropriate and will ensure significant effects are avoided	Please refer to NFPC.TT.1	Not agreed
Other Documents and Plans				
NFPC.TT.12	Outline management plans	The Outline Construction Traffic Management Plan (APP-211) is secured as a requirement in the draft DCO (REP1-008) and is appropriate with regards to proposed mitigation and monitoring.	Please refer to NFPC.TT.1	Not agreed

Reference Number	Discussion point	Applicants' position	Newton with Clifton and Freckleton Parish Council's Position	Status
NFPC.TT.13	Outline management plans	The Outline Highways Access Management Plan (APP-213) is secured as a requirement in the draft DCO (REP1-008) and is appropriate with regards to proposed mitigation and monitoring.	Please refer to NFPC.TT.1	Not agreed

1.4.9 Noise and Vibration

Table 1.12: Agreement Log between the parties on Noise and Vibration

Reference Number	Discussion point	Applicants' position	Newton with Clifton and Freckleton Parish Council's Position	Status
EIA				
NFPC.NV.1	Surveys	<p>The site-specific surveys for noise and vibration have been undertaken in accordance with agreed methodologies</p> <p>The Applicants have identified these receptors as part of our noise and vibration assessment and is presented in APP-119 and APP-120.</p>	<p>REP4-167 does identify additional receptors, relating to the Veterinary Centre at Kirkham Rd/Hillock Lane.</p> <p>Unable to provide additional comment at this time, until the situation with Fylde resolved and their data is available for review.</p> <p>Our earlier comments about non-concurrent construction also apply here.</p>	Not agreed
NFPC.NV.2	Surveys	Sufficient primary and secondary data (including site-specific surveys) has been collated to appropriately characterise the noise and vibration baseline environment for the purposes of Environmental Impact Assessment (EIA) within Volume 3, Chapter 8: Noise and Vibration (APP-117).	<p>REP4-167 does identify additional receptors, relating to the Veterinary Centre at Kirkham Rd/Hillock Lane.</p> <p>Unable to provide additional comment at this time, until the situation with Fylde resolved and their data is available for review.</p>	Not agreed

Reference Number	Discussion point	Applicants' position	Newton with Clifton and Freckleton Parish Council's Position	Status
		The Applicants have identified these receptors as part of our noise and vibration assessment and is presented in APP-119 and APP-120.	Our earlier comments about non-concurrent construction also apply here.	
NFPC.NV.3	Baseline environment	<p>The baseline environment for noise and vibration is appropriately characterised in Volume 3, Chapter 8: Noise and Vibration (APP-117).</p> <p>The Applicants have identified these receptors as part of our noise and vibration assessment and is presented in APP-119 and APP-120.</p>	<p>REP4-167 does identify additional receptors, relating to the Veterinary Centre at Kirkham Rd/Hillock Lane.</p> <p>Unable to provide additional comment at this time, until the situation with Fylde resolved and their data is available for review.</p> <p>Our earlier comments about non-concurrent construction also apply here.</p>	Not agreed
NFPC.NV.4	Study Area	<p>The noise and vibration study area is appropriate for the impacts and the receptors assessed.</p> <p>The Applicants have identified these receptors as part of our noise and vibration assessment and is presented in APP-119 and APP-120.</p>	<p>REP4-167 does identify additional receptors, relating to the Veterinary Centre at Kirkham Rd/Hillock Lane.</p> <p>Unable to provide additional comment at this time, until the situation with Fylde resolved and their data is available for review.</p> <p>Our earlier comments about non-concurrent construction also apply here.</p>	Not agreed
NFPC.NV.5	Assessment methodology	<p>The sensitivity and significance of the noise and vibration receptors has been appropriately and adequately described within Volume 3, Chapter 8: Noise and Vibration (APP-117).</p> <p>The Applicants have identified these receptors as part of our noise and vibration assessment and is presented in APP-119 and APP-120.</p>	<p>REP4-167 does identify additional receptors, relating to the Veterinary Centre at Kirkham Rd/Hillock Lane.</p> <p>Unable to provide additional comment at this time, until the situation with Fylde resolved and their data is available for review.</p> <p>Our earlier comments about non-concurrent construction also apply here.</p>	Not agreed

Reference Number	Discussion point	Applicants' position	Newton with Clifton and Freckleton Parish Council's Position	Status
NFPC.NV.6	Assessment methodology	<p>The methodologies used in within Volume 3, Chapter 8: Noise and Vibration (APP-117) are appropriate for assessing the potential impacts of the Transmission Assets.</p> <p>The Applicants have identified these receptors as part of our noise and vibration assessment and is presented in APP-119 and APP-120.</p>	<p>REP4-167 does identify additional receptors, relating to the Veterinary Centre at Kirkham Rd/Hillock Lane.</p> <p>Unable to provide additional comment at this time, until the situation with Fylde resolved and their data is available for review.</p> <p>Our earlier comments about non-concurrent construction also apply here.</p>	Not agreed
NFPC.NV.7	Assessment methodology – operational noise	<p>The methodologies used in within Volume 3, Chapter 8: Noise and Vibration (APP117) are appropriate for assessing the potential impacts of the Transmission Assets in respect of operational noise.</p> <p>The Applicants have identified these receptors as part of our noise and vibration assessment and is presented in APP-119 and APP-120.</p>	<p>REP4-167 does identify additional receptors, relating to the Veterinary Centre at Kirkham Rd/Hillock Lane.</p> <p>Unable to provide additional comment at this time, until the situation with Fylde resolved and their data is available for review.</p> <p>Our earlier comments about non-concurrent construction also apply here.</p>	Not agreed
NFPC.NV.8	Project design envelope	<p>The appropriate Maximum Design Scenario has been used in the Volume 3, Annex 8.2: Construction Noise and Vibration technical report (APP-119).</p> <p>The Applicants have identified these receptors as part of our noise and vibration assessment and is presented in APP-119 and APP-120.</p>	<p>REP4-167 does identify additional receptors, relating to the Veterinary Centre at Kirkham Rd/Hillock Lane.</p> <p>Unable to provide additional comment at this time, until the situation with Fylde resolved and their data is available for review.</p> <p>Our earlier comments about non-concurrent construction also apply here.</p>	Not agreed
NFPC.NV.9	Assessment of the effects from the project alone - operational noise	<p>There will be no significant residual effects on noise sensitive receptors from the operation of the Transmission Assets.</p> <p>The Applicants have identified these receptors as part of our noise and vibration</p>	<p>REP4-167 does identify additional receptors, relating to the Veterinary Centre at Kirkham Rd/Hillock Lane.</p>	Not agreed

Reference Number	Discussion point	Applicants' position	Newton with Clifton and Freckleton Parish Council's Position	Status
		assessment and is presented in APP-119 and APP-120.	Unable to provide additional comment at this time, until the situation with Fylde resolved and their data is available for review. Our earlier comments about non-concurrent construction also apply here.	
NFPC.NV.10	Assessment of the effects from the project cumulatively with other projects	There will be no significant residual effects on noise and vibration sensitive receptors from the development of the Transmission Assets when considered cumulatively with other projects. The Applicants have identified these receptors as part of our noise and vibration assessment and is presented in APP-119 and APP-120.	REP4-167 does identify additional receptors, relating to the Veterinary Centre at Kirkham Rd/Hillock Lane. Unable to provide additional comment at this time, until the situation with Fylde resolved and their data is available for review. Our earlier comments about non-concurrent construction also apply here.	Not agreed
Other Documents and Plans				
NFPC.NV.11	Outline Construction Noise and Vibration Management Plan (APP-215)	The Outline Code of Construction Practice (APP-193) and the accompanying Outline Construction Noise and Vibration Management Plan (APP-196) are secured through the dDCO (AS-004) and are appropriate with regard to proposed mitigation and monitoring measures.	REP4-167 does identify additional receptors, relating to the Veterinary Centre at Kirkham Rd/Hillock Lane. Unable to provide additional comment at this time, until the situation with Fylde resolved and their data is available for review. Our earlier comments about non-concurrent construction also apply here.	Not agreed

1.4.10 Draft DCO

Table 1.13: Agreement Log between the parties on the Draft DCO

Reference Number	Discussion point	Applicants' position	Newton with Clifton and Freckleton Parish Council's Position	Status
EIA				
NFPC.DCO.1	Specific requirements for discussion to be confirmed	<p>The Applicants consider no provision of a requirement is needed with Newton with Clifton and Freckleton Parish Councils for the reasons set out below:</p> <p>The Applicants would like to reiterate that BNG is not yet mandatory for projects subject to the DCO consenting regime, and as such the BNG assessment undertaken is voluntary. The Applicants can confirm that DEFRA's statutory BNG metric calculator was used to calculate the biodiversity net gain for permanent infrastructure within the Onshore Order Limits, and that a 'custom-made' metric was not used. The metric calculator spreadsheet was submitted into the examination by the Applicants at Deadline 4 (REP4-066).</p> <p>With regards to the Applicants committing to simultaneous construction, the Applicants have set out their position on this clearly at section 8.2 of the Applicants' response to HAP USH1_6, 7, 9, 19, 26 (REP3-041). The Applicants reiterate that delivery of offshore windfarms at this scale involves the alignment of a large number of elements, as well as land and consents, supply chain,</p>	<p>NFPC.DCO.1 – the councils would like the following requirements:</p> <ul style="list-style-type: none"> To provide at least 10% biodiversity net gain according to the statutory metric and user guide Not to commence one project until the other is ready to commence <p>It is apparent that the proposed mitigation areas (not even including the proposed new BNG habitat, considered below) are not suitable as they will increase the risk of bird strike. If they are being downgraded, their benefits should be reassessed.</p> <p>The existence of masts on the substations, which are likely to need to be lit given their proximity to the two airports, will also divert migrating birds towards the airports on either side of their current route passing over the proposed substation sites, further adding to these risks</p> <p>Item 4 c) The Applicant has admitted that they have excluded the temporary land within the Order Limits (i.e. the entire 30km cable route) from the biodiversity metric calculation, when it is clear that it will not be fully restored within two years, which means it should be</p>	Not agreed

Reference Number	Discussion point	Applicants' position	Newton with Clifton and Freckleton Parish Council's Position	Status
		<p>grid connection, financing, and CfD. To include a requirement for simultaneous construction may not therefore be possible, nor practical under the UK's delivery model for offshore wind. The Applicants refer also to the Rule 9 – Environmental Statement assessment of Construction Scenarios (AS-070) which sets out whether concurrent or sequential construction is the worst-case construction scenario for each topic of the Environmental Statement. It is worth noting that there are impacts where concurrent construction would be the worst-case scenario, and so it does not follow that to enforce simultaneous construction through a requirement in the DCO is the most beneficial approach.</p> <p>In terms of the lightning mast, the Applicants are continuing to engage with BAE Systems regarding technical safeguarding requirements and further updated will be provided into the examination as appropriate.</p>	<p>included according to the rules. This will increase the requirement for BNG by a very significant amount, and it is virtually certain that the claimed gains will not in fact occur.</p> <p>The parish councils ask the ExA to require the Applicants to calculate the before and after BNG figures using the correct metric, as encouraged by the National Policy Statement (EN-1 paragraph 4.6.7) so it can at least be properly considered as to whether the project will be over or under the 10% gain target. Given the pressure on other DCOs to provide 10% BNG and the imposition of requirements for high figures, this is essential even though the 10% gain is not yet a legal obligation. Any requirement added for BNG should require the correct metric to be used, not a custom-made one created by the Applicants as at present.</p> <p>Not only is the BNG being offered much lower than is claimed if the metric is used correctly, but the measures to reduce bird hazards set out in the recently produced Outline Wildlife Hazard Management Plan (REP3-065) are only described as 'potential' and will serve to worsen the habitats being provided on which the existing calculations are based. The BNG scores should be recalculated for the habitats being offered with these downgrades, and an ecologist's opinion should be sought to confirm that with the downgrades they still fall under the definitions of the habitats claimed.</p> <p>Note that the project is in the large National Character Area of 'Liverpool and Amoudherness</p>	

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			<p>Plain' which extends from Garstang to near Crosby; any habitat in this area would not suffer a spatial penalty. (A map can be found here and should be pasted into our response: https://historicengland.org.uk/research/results/reports/8049/LancashireandAmoundernessPlainWesternMixed)</p> <p>The decision on lighting of the masts is for BAE and BAE only, no matter what the Applicant thinks!</p>	