



MORGAN AND MORECAMBE OFFSHORE WIND FARMS: TRANSMISSION ASSETS

Annex 2.4 to Applicants' Response to Deadline 5 submissions from Statutory Consultees and other organisation: Lancashire County Council



Deadline: 6
Application Reference: EN020028

Document Numbers:
MRCNS-J3303-JVW-19239
MOR001-FLO-CON-ENV-NOT-0099

Document Reference: S_D6_2.4

22 October 2025
F01

Document status					
Version	Purpose of document	Approved by	Date	Approved by	Date
F01	Submission at Deadline 6	GL	October 2025	PM	October 2025

Prepared by:

Morgan Offshore Wind Limited,
Morecambe Offshore Windfarm Ltd

Prepared for:

Morgan Offshore Wind Limited,
Morecambe Offshore Windfarm Ltd

Contents

1 APPLICANTS’ RESPONSE TO IPS’ SUBMISSIONS AT DEADLINE 5.....1
 1.1 Introduction1

2 APPLICANTS’ RESPONSE TO IPS’ SUBMISSIONS AT DEADLINE 5.....2
 2.1 Lancashire County Council2

Tables

Table 2-1: REP5-174 – Lancashire County Council (Responses to ExQ2 and dDCOQ1).....2

Table 2-2: REP5-174 – Lancashire County Council (Appendix A – Landscape Comments on the
 Outline Design Principles).....37

Glossary

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

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

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

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

Acronyms

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

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

Units

Unit	Description
%	Percentage
dB	Decibels
Kg	Kilogram
kHz	Kilohertz

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

1 Applicants' Response to IPs' Submissions at Deadline 5

1.1 Introduction

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

2 Applicants' Response to IPs' submissions at Deadline 5

2.1 Lancashire County Council

Table 2-1: REP5-174 – Lancashire County Council (Responses to ExQ2 and dDCOQ1)

Reference	ExA Question	IP submission	Applicants' response
ExQ2 Q2:1.1.1	<p>Co-ordination and collaboration</p> <p>The applicants response to ExQ1.1.7 [REP3-056] explains that whilst flexibility is required to allow each of the projects to construct independently on each other, opportunities may emerge for further coordination depending on each project achieving Financial Investment Decision and following detailed design. Notwithstanding the measures introduced such as Requirement 25 (Onshore collaboration) in the draft Development Consent Order (dDCO), what further specific drafting can be incorporated into the relevant control and management documents and the dDCO to ensure that full opportunities are taken for co-ordination and collaboration where such opportunities emerge, in the interests of reducing and minimising the potential effects of the proposed development upon communities and the environment?</p>	<p>The County Council questions if this Article is still needed if the DCO applications for the Morgan Offshore Wind Project Generation Assets and the Morecambe Offshore Windfarm Generation Assets are decided by the time this Examination has concluded. The Secretary of State granted development consent for the Morgan Offshore Wind Project Generation Assets on 29th August 2025. As a minimum the County Council considers that Article 3(2) needs amending to take account of the latest position.</p> <p>If the intention is to ensure that there is co-ordination between the projects in the event that both are approved then as currently worded Requirement 25 does not achieve this. As a minimum The County Considers that sub-paragraph (b) should amended to state:</p> <p><i>(b) when submitting any plan or document referred to in sub-paragraph (a) for approval, submit any comments duly received from Morecambe/Morgan or a statement confirming that no such comments were received, and statement setting out how these have been taken into account, and where they have not, why this has been the case.</i></p>	<p>In relation to Article 3, the Applicants maintain that Article 3(1) is required regardless of the consents for the Generation Assets. Article 3 parts (2) and (3) are in square brackets on the basis that these can be removed if consent for the respective Generation Assets is granted. The Applicants have updated the draft DCO (C1/F09) at Deadline 6 to remove Article 3(2) on the basis that the Morgan Offshore Wind Project Generation Assets project has been consented, however the Applicants need to retain the equivalent drafting in relation to Morecambe as the Morecambe Offshore Windfarm Generation Assets have not yet been consented.</p> <p>With regards to LCC's proposed additional wording in Requirement 25, the Applicants would flag the additional updates at D5 to provide for a Construction Coordination Working Group (CCWG) which the Applicants consider already cover this. The CCWG will facilitate discussion of detailed management plans and enable feedback on how comments have been addressed between each of the Applicants, specifically in the context of Requirement 25 (onshore collaboration) in Schedules 2A and 2B of the draft DCO. Notwithstanding the Applicants position, the Applicants have also updated Requirement 25 of Scheudles 2A and 2B of the draft DCO (C1/F09) to confirm that when the undertaker submits any information for approval under the requirements</p>

Reference	ExA Question	IP submission	Applicants' response
			this must include a statement setting out how the other undertaker's comments have been taken into account and if they have not, the statement must explain why not.
ExQ2 Q2:1.1.5	Outline Communications Plan An updated Outline Communications Plan has been submitted by the applicants at deadline 4 (D4) [REP4-029]. <ul style="list-style-type: none"> a) Do the local authorities and parish councils have any comments and/or additional suggestions on the drafting of this plan? b) The updated version of the plan no longer includes reference to a 'local liaison committee, comprising relevant local representatives' that was included in paragraph 1.3.1.1 of the previous version of the plan. Can the applicants explain why this has been deleted? c) Do the local authorities and parish councils consider that the creation of a local liaison committee should be retained in the outline plan? 	The County Council is content for the details of the communications plan to be the subject of Requirement 8 which provides a basis for the details of local liaison to be further discussed and approved at a later date. Regarding a local liaison committee, the County Council considers that these might have a useful function particularly to engage with parish councils. However, as the scheme potentially affects so many interests, the membership and terms of reference of each liaison meeting would need to be carefully drawn up so that such meetings would not become unwieldy. Each liaison meeting would have to be held for a sufficiently restricted part of the route for similar reasons. Some parts of the route may also not necessitate such an approach for example where there is no parish council.	The Applicants welcome the comment from LCC. The detail around local liaison will be progressed further during the post consent phase.
ExQ2 Q2:6.1.3	Sand lizards outline Sand Lizard Mitigation Plan [REP4-117] has been submitted as D4.	Lancashire County Council considers that insufficient time has been allowed to give this proper consideration. However, the County Council is not specifically required to respond to this question and is content to defer to Natural England as part of its	Noted

Reference	ExA Question	IP submission	Applicants' response
	a) Can you comment on the appropriateness of the plan. b) Please comment on the proposal and EPS licencing strategy outlined.	consideration of the Letter of No Impediment.	
ExQ2 Q2:6.1.7	Peat CoT101 states that where high concentrations of peat are identified these, will be avoided where practicably possible for the placement of the plant and infrastructure to avoid the possibility of ground gas build up. Where this is not possible, further investigation and appropriate monitoring will be identified undertaken, if necessary. and the results will be used to inform detailed design of the permanent infrastructure as appropriate Is this commitment adequate to ensure appropriate management and mitigation? If, not, can you propose alternative wording/ mechanism?	The County Council considers that a view needs to be taken on the likely risks of ground gas build up. The wording of the CoT101 is quite flexible but it is considered that a stronger more definitive wording is only required if the risks justify such an approach.	Noted
ExQ2 Q2:6.1.8	Peat NE state "We note the surveys undertaken in the outline Interim Trial Trenching Report [REP3-017] . This report identified that peat was present within the trial pits. In light of the confirmed peat occurrences, a detailed peat survey should be carried out to establish peat depth, condition, and extent within the onshore order limits, ensuring that appropriate	The County Council considers that this seems to be primarily an issue for Natural England. However, if further surveys are not possible before conclusion of the examination, the County Council considers that this issue could be the subject of an additional Requirement or amendment to the existing Construction Working Scheme to provide for a soils management strategy to demonstrate how any peat will be separately excavated and stockpiled, backfilled into the	The Applicants note LCC's response. The outline Soil Management Plan (REP5-059) sets out the principles for managing soils based on best practice guidance (Department for Environment & Rural Affairs (Defra) Construction Code of Practice for the Sustainable Use of Soils on Construction Sites (Defra, 2009) and Institute of Quarrying (IQ) Good Practice Guide for Handling Soils in Mineral Workings (IQ, 2021). In addition, section 1.8.6 of the Outline Soil Management Plan (REP5-059) sets out additional measures for soil handling of peat soils. Detailed

Reference	ExA Question	IP submission	Applicants' response
	<p>management and mitigation measures can be developed. These surveys are necessary to understand if any of the peat is restorable and to inform a Peat Management Plan (which we previously advised in our Relevant Representations, RR-1601)."</p> <p>a) Please comment on the above statement and provide an update.</p> <p>b) If resolution can't be reached before the end of the examination what mechanism would be appropriate to ensure no peat disturbance and appropriate management, and mitigation is ensured post consent.</p>	<p>working corridor and restored to retain the existing hydrological conditions so that the peat is restorable.</p>	<p>soil management plan(s) will be developed in line with the outline soil management plan, secured by Requirement 8, Schedules 2A & 2B of the draft Development Consent Order (REP5-010). The Applicants consider that these are appropriate measures to secure mitigation and the management of peat if encountered during detailed design. The Applicants therefore maintain that a separate requirement for this is neither necessary nor justified.</p>
ExQ2 Q2:6.2.4	<p>Biodiversity and bird strike risks</p> <p>NPS EN-1 4.6.12 says that when delivering biodiversity net gain off-site, developments should do this in a manner that best contributes to the achievement of relevant wider strategic outcomes, for example by increasing habitat connectivity, enhancing other ecosystem service outcomes, or considering use of green infrastructure strategies. Reference should be made to relevant national or local plans and strategies, to inform off-site biodiversity net gain delivery. If published, the relevant strategy is the Local Nature Recovery Strategy</p>	<p>The County Council considers that the councils and the applicants could reach an agreement on alternatives that would align with the NPS EN-1. As per the response to the Examining Authority's First Written Questions:</p> <p>Provision of mitigation, compensation and enhancement measures as close as possible to the point of impact is appropriate and is supported by recognised best practice guidance (for example, CIEEM Guidelines for Ecological Impact Assessment). However, this doesn't preclude the possibility of off-site compensation measures. As long as the requirements of legislation, national policy and recognised</p>	<p>The Applicants welcome confirmation that the provision of mitigation, compensation and enhancement measures as close as possible to the point of impact are appropriate and are supported by best practice guidance.</p> <p>In respect of points a) to c) the Applicants submitted a Biodiversity Benefit Supporting Statement (REP5-145) at Deadline 5, and provided a clear framework for the approach to delivering biodiversity benefits to meet national and local policy requirements (including a commitment to delivering a minimum 10% net gain) . This also included consideration of alternative options for off-site delivery through funding of local projects, and/ or purchase of offsetting credits from a registered provider that would enable the policy requirements to be met, in accordance with the prioritisation exercise detailed in the outline biodiversity benefit</p>

Reference	ExA Question	IP submission	Applicants' response
	<p>(LNRS). If an LNRS has not been published, the relevant consenting body or planning authority may specify alternative plans, policies or strategies to use.</p> <p>a) If SoS was minded to agree with BAE Systems position, can the applicant comment on the quoted paragraph 4.6.12 of NPS EN-1?</p> <p>b) If SoS was minded to agree with BAE Systems position and on-site delivery of BNG was therefore not possible, could the councils and the applicants reach an agreement on alternatives that would align with the NPS EN-1?</p> <p>c) If SoS was minded to agree with BAE Systems position, will the applicants consider submitting a without prejudice strategy for off-site delivery of BNG to satisfy the NPS EN-1, section 4.6 with additional focus on 4.6.1?</p>	<p>best practice guidance are met, then departures from the applicant's own site selection guiding principles could be allowed, including mitigation outside of wildlife hazard management zones.</p> <p>In cases where required habitat creation/enhancement cannot be achieved within the Order Limits, then habitat creation/enhancement elsewhere within the Local Planning Authority boundary, National Character Area or Marine Plan Area would be appropriate wherever possible.</p> <p>Lancashire's emerging Local Nature Recovery Strategy (LNRS) is now available as a consultation draft. Final publication is expected in December 2025. The LNRS includes mapped opportunity areas where habitat creation and enhancement would provide the greatest benefits for Lancashire's biodiversity and habitat connectivity. This will affect the Strategic Significance score within the metric, which will also be relevant to the required extent of habitat creation/enhancement.</p>	<p>management plan and requirement 26 of the draft DCO (C1/F09). The Applicants would highlight that the second priority, after securing biodiversity benefit as part of Work No.44A is securing it as part of biodiversity projects delivered within close proximity to the Order limits through the local nature recovery fund. Therefore, LCC's comments relating to the Local Nature Recovery Strategy, which informs the local nature recovery fund, are taken on board by the Applicants' updated drafting.</p> <p>These details have now been developed in the outline Biodiversity Benefit Plan (J11/F6) and the amendments to requirement 26 in Schedules 2A and 2B of the draft DCO (C1/F09) which secure the details set out above. Requirement 26 secures a prioritisation exercise, including a</p>
ExQ2 Q2:11.1.1	<p>On-shore archaeological evaluation</p> <p>At deadline 4 (D4) and further to discussion at issue specific hearing 3, the applicants submitted a summary of trial trenching approaches in other Development Consent Order applications [REP4-114] in addition to a timetable of trial trenching [Action Point ISH2.49 of REP4-108].</p>	<p>The Lancashire County Council Historic Environment Team (LCCHET) is of the opinion that the evaluation could be completed post any development consent being granted but this raises concerns in two respects. Firstly, it must be questioned whether the archaeological evaluation carried out to date has been sufficiently comprehensive to adequately characterise the heritage value of the site and therefore to allow a proper and robust assessment of</p>	<p>The Applicants do not agree with the assertion made by Lancashire County Council (LCC) that '<i>it must be questioned whether the archaeological evaluation carried out to date has been sufficiently comprehensive to adequately characterise the heritage value of the site and therefore to allow a proper and robust assessment of archaeological value against the other environmental impacts and benefits of the proposal</i>'. The assessment presented in ES Volume 3, Chapter 5: Historic environment (APP-096) takes a precautionary approach with regard to the likely impacts on</p>

Reference	ExA Question	IP submission	Applicants' response
	<p>Taking account of these submissions and any further discussions that have taken place between the two parties, please provide a summary update on the positions of the two parties and any remaining disagreements regarding onshore archaeology. These should include whether LCC is satisfied that the remaining evaluation through trial trenching can take place post any development consent being granted.</p>	<p>archaeological value against the other environmental impacts and benefits of the proposal. Secondly, there is a risk that the evaluation and/or other archaeological works considered necessary may now continue into the construction phase, with a potential to then cause delay to the scheme.</p> <p>There remains a concern that there has been a failure to move the project forward since August 2024 when 139 of 222 proposed trial trenches were excavated. For instance, why has there not been any attempt to excavate the remaining 83 trenches, for which there was permission to enter the land, in the period August 2024 to now, and to obtain C14 dates for those features that contained the necessary material. It would be a normal expectation that a copy of the final report, or at the very least a draft version of it, including all relevant specialist reports would have been made available to LCCHET by now and it is considered to be a matter of some urgency that this is done prior to the next stage of evaluation works commencing next year.</p> <p>LCCHET has been in receipt (11th August 2025) of further e-mail correspondence from Mr M Rawlings, the applicant's archaeological consultant, which contained an indicative summary of the process which gives a timeframe of 15 months to complete all evaluation/further investigation works prior to the commencement of construction. This would appear to be highly optimistic given the need for time to complete on-site works, for them to be fully reported (a</p>	<p>buried archaeological remains and deposits of geoarchaeological and palaeoenvironmental interest. This approach results in an effect of <u>up to</u> moderate adverse significance, with a subsequent comment explaining that the uncertainty will be addressed through a programme of mitigation as set out in the Outline Onshore and Intertidal Written Scheme of Investigation (J9/F05).</p> <p>This approach is standard on large scale projects where access to land for trial trenching can be restricted as a result of landowner concerns, ground conditions and seasonality. At Deadline 4 the Applicants provided information regarding the approach taken to pre-consent trial trenching on similar projects (REP4-114). This demonstrates that the Applicants' approach is not uncommon and reflects the reality of the situation. Any subsequent risk to the construction programme is for the Applicants to manage, noting that construction does not commence at the same time in all areas within the Order Limits.</p> <p>It is incorrect to state that there is or was permission to enter land to carry out the remaining 83 trenches (out of the 222 trenches initially agreed). Annex 9.5 to the Applicants' Response to Hearing Action Points ISH2 48 (REP4-114) clearly explains that the 2024 programme of trial trenching was concluded in the August of that year when it became clear that no further access for trenching was likely to be agreed ahead of the return of poorer weather in the autumn.</p> <p>The Applicants can confirm their intention to update the current interim report on the results of the 2024 trial trenching (REP3-016) to a full report, including the incorporation of the results of a programme of radiocarbon dating along with information resulting from the processing of</p>

Reference	ExA Question	IP submission	Applicants' response
		<p>process that can take as long, if not longer, than the time spent on site), and for the cycle to be repeated with any subsequent further on-site works that might be considered necessary, but which could be reported during the construction phase.</p> <p>A large number of trial trenches remain to be excavated (the final total expected to be in the region of 300-350) but LCCHET has yet to see sight of the proposed layout. LCCHET is of the opinion that the amount of evaluation work that remains to be done and reported could take up the whole of 2026 and now means there is an increased risk of some of the on-site archaeological works, whether that be the evaluation or further archaeological works, now having to be completed in the construction phase which is scheduled to commence Q4 of 2026.</p> <p>In an attempt to ensure that this is not the case it has therefore been agreed that:</p> <ul style="list-style-type: none"> the results of the 2024 evaluation will be written up into a formal report complete with specialist reports; a site-wide trial trenching plan will be drawn up, both of which will be submitted to LCCHET in the next few months at the latest; given the tight timescale the proposed Q2-2026 evaluation works will prioritise works in those areas where the scheme is scheduled to start in Q4-2026 with a view to ensuring these areas are free of any archaeological interest before the end of Q3-2026; 	<p>environmental sampling. This updated report will be submitted to LCC as soon as it is available and will facilitate the design of any further archaeological work that might be required in areas where trial trenching has been completed.</p> <p>The Applicants can also confirm their intention to carry out the remaining programme of trial trenching and geoarchaeological investigation in the spring and summer of 2026, subject to landowner agreement for access. Draft trench locations plans have been prepared.. All trench locations will be agreed with LCC and Historic England (where appropriate) ahead of commencement. This programme of further trial trenching and geoarchaeological investigation will be prioritised in areas where early construction work is likely to be required.</p> <p>The Outline Onshore and Intertidal Written Scheme of Investigation (J9/F05) has been updated for Deadline 6 to cover the other issues raised by LCC in their response. This includes reference to the potential use of a strip, map and sample (SMS) methodology instead of trial trenching and also the requested additional point regarding the need for a final publication report to provide an overarching synthesis of all archaeological and geoarchaeological work across both Projects.</p> <p>The Applicants acknowledge the request to make reference within the Onshore Construction Method Statement (OCMS) to the Historic Environment management measures. This has been captured in the updated OCMS at Deadline 6 (S_D4_11/F02).</p>

Reference	ExA Question	IP submission	Applicants' response
		<ul style="list-style-type: none"> each phase of evaluation will need to be properly written up prior to the creation of any Site Specific Written Scheme of Investigation (SSWSI) for that area or areas; and consideration may be given to the use of a strip, map and sample methodology being used in place of trial trenching where time constraints may not allow for more than one phase of on-site works being undertaken as it would remove both a reporting stage and the need to submit a further SSWSI. <p>The prospect that Projects A & B might be built consecutively means that in all likelihood more than one archaeological contractor will be used. As a result of this the Onshore Archaeology WSI will need to be amended to ensure that upon completion of each Project, the works undertaken will, should it be considered necessary, be published in an academic publication (monograph) with the publication of the later scheme also containing an overarching synthesis of the two Projects.</p> <p>Although the Outline Onshore Construction Method Statement (REP4-115) does not contain any specific reference to the need for archaeological works to be undertaken either prior to, or during, construction, section 1.2.1.1 refers to the Outline Onshore Construction Method Statement as merely being an Appendix to the Outline Code of Construction Practice (REP-027) and therefore bound by section 1.8.4.2, Historic</p>	

Reference	ExA Question	IP submission	Applicants' response
		<p>Environment Management measures, of the Outline Code of Construction Practice (REP-027) where it states that "further programmes of archaeological and geoarchaeological investigation will lead to analysis, reporting of results and archiving of date."</p> <p>It might however seem prudent, for the avoidance of any doubt, for some reference to the Historic Environment to be included in the Outline Onshore Construction Method Statement, given that section 1.2.2.1 states that "This Outline Onshore Construction Method Statement sets out the construction methodology and environmental considerations associated with the construction of the onshore elements of the Transmission Assets" even if it were just to include a reference back to the aforementioned section of the Outline Code of Construction Practice.</p>	
ExQ2 Q2:13.1.1	<p>Engagement and statements of common ground</p> <p>The ExA notes the schedule of meetings on landscape and visual matters, as well as green belt matters, set out in [REP4-110]. Subsequently, the ExA looks forward to the receipt of the applicants updated Outline Design Principles and relevant Statements of Common Ground (SoCG by deadline 5 (22 September 2025) as set out in the schedule.</p> <p>The SoCGs should include (as well as matters of agreement) any matters</p>	<p>Meetings have been arranged to discuss the Outline Design Principles (ODP) (which are currently a work in progress draft and incomplete) and general Landscape issues SoCG (also in draft). The first opportunity to assess all documents noted above was 16th September 2025. To provide the necessary feedback to the Applicants requires more time than the 22nd September deadline permits. The Draft Green Belt SoCG has not yet been viewed. Lancashire Couty Council's comments on the Green Belt Technical Note would be of value.</p>	<p>The Applicants welcomed the opportunity to meet in person with LCC's Principal Landscape Officer on 15 September 2025 and valued the constructive discussion and exchange of views.</p> <p>The Applicants note LCC's comments on the <i>outline Design Principles</i> (oDP, J3/F03), the indicative landscape strategy as presented in the <i>outline Landscape Management Plan</i> (oLMP, J2/F05), and the associated <i>Statements of Common Ground</i> (SoCG). The Applicants recognise the short turnaround periods and appreciate the time taken by LCC to provide detailed input.</p> <p>The Applicants also acknowledge that both the oDP and SoCG remain in draft form and are subject to ongoing</p>

Reference	ExA Question	IP submission	Applicants' response
	<p>that remain in disagreement between the parties, along with explanation and justification for the positions taken. It should include matters concerning the Landscape and Visual Impact Assessment, outline Landscape Management Plan [REP4-054] and the applicants Green Belt Technical Note [REP4-092].</p>	<p>The face to face meeting with the Applicant's Landscape Expert Witness (15th September 2025), was productive in communicating and discussing issues, but time is required to assess how this information exchange is interpreted and translated into updated Landscape Proposals and documents. To date this has not been forthcoming, despite six months of communication with the Applicant.</p> <p>LCC is not currently able to comment on the Draft SsoCG until after the 22nd September deadline and updated documents are discussed in more detail. The ODP was draft in format which again limits the scope for constructive comment, until further detailed and issued. From that detailed to date however, the following points apply to the ODP;</p> <ul style="list-style-type: none"> Of greatest concern is that the Applicant assumes in the document that the Landscape Strategy is complete and can therefore move to detailed design (Under Landscape Institute Work Stages assumes Stage E, whereas it is considered by LCC that Design Development is Stage C/D). The Landscape Strategy (Proposals) are not yet complete. There is genuine concern that if the current Landscape Strategy is accepted it is carried through to post consent and would not be amended further. Several 'Key Drivers' have not yet been taken on board. Despite 6 months of 	<p>refinement through the Examination, with further updated versions provided at Deadline 6.</p> <p>In response to comments made by LCC in response to this ExQ, the Applicants remind LCC that the DCO application is parameter-based. Accordingly, the purpose of the oDP and the outline management plan submitted are to set out clear design principles and parameters rather than a fully resolved landscape strategy at this stage. Furthermore, the oDP applies to the Project as a whole, not solely the substations, as confirmed in the Deadline 5 submission (REP5-064) and the subsequent interim updates (J3/F02.1 and J3/F02.2) shared with the Councils ahead of the final draft (J3/F03).</p> <p>On governance, the proposed Design Champion and structured design review process are considered to provide a proportionate and effective mechanism for ensuring design quality, with the relevant planning authority engaged as part of the discharge process. This is FBC's preferred post-consent governance mechanism, presently.</p> <p>Concerns regarding clarity have been addressed in the updated oDP, with revisions made to reduce non-committal wording and to provide stronger commitments to delivery through the DCO Requirements. The iterative drafting process continues to refine the oDP in direct response to engagement with relevant Councils..</p> <p>Further detailed responses to LCC's specific comments, outlined in summary above, are set out in Table 2-2 (<i>Appendix A – Landscape Comments on the Outline Design Principles</i>).</p>

Reference	ExA Question	IP submission	Applicants' response
		<p>discussions and comments the Landscape Strategy has not been updated;</p> <ul style="list-style-type: none"> • It was noted the document referred mainly to Substations and it was agreed that it should apply to the whole development; • The Applicant proposes a Design Champion. This differs from the Design Panel suggested by the Examiners (see Q2.13.1.5 below). The concerns itemised below would apply. The Applicants Design 'Partner' would not be independent. • The 'Peoples' and 'Places' elements of The Strategic Design principles is considered very weak; • The Applicant uses words such as 'may' or 'might', which offer no assurance that issues would be addressed; • The Applicant uses misleading wording constantly to justify the case and does not present an honest annotation of landscape and visual effects. The mitigation planting is not 'woodland', it is a thin strip of native tree structure planting; and • There are confusing conflicting references to built form and associated Substation design. <p>Detailed comments on the ODP are attached as Appendix A to this submission.</p>	

Reference	ExA Question	IP submission	Applicants' response
ExQ2 Q2:13.1.5a	Design review process, consultation and engagement a) What is the latest position of the parties regarding the possibility of an independent design review process for the proposed onshore substations?	<p>It is unknown if an Independent Review Panel (IRP) is proposed. There are several issues of concern that might arise from this:</p> <ul style="list-style-type: none"> Who would fund the panel? Its independence could be compromised if funded by the Applicant. It is unlikely that LPA's would have the funding available. Who selects the Design Panel? This could influence the advice and outcome; Landscape often takes last place in construction projects - this large a project has a predominantly rural context and this should be reflected in the Panel selection. What is the timescale for this? It is recommended (Design Review Principles and Practice 2019) that an IRP should be set up early in the process, it is queried whether it is now too late? <p>Equally there should be sufficient time for the panel to assess the site and background information.</p>	<p>The oDP (J3/F03), prepared in consultation with relevant Councils, establishes governance protocols to support Fylde Borough Council (FBC) in discharging Requirement 4 of Schedules 2A and 2B of the draft DCO (C1/F09) in relation to substation design. Section 6 of the oDP sets out the indicative design development programme together with Project Level Design Principles and Design Codes.</p> <p>Reflecting FBC's position at Deadline 4/5 and recent SoCG engagement, a formal Independent Design Review (IDR) has not been considered necessary by either FBC or the Applicants. FBC maintain that, should an IDR be required, this would be agreed with the Applicants following the grant of consent and not imposed on the Council. Any related timescales would be addressed through post-consent discussions.</p> <p>FBC also consider the Applicants' commitment to Design Champions to be a material element of governance, enabling the Council, in consultation with the Applicants, to determine appropriate engagement with stakeholders. The oDP will also be certified and secured through Requirement 4 of the draft DCO.</p> <p>In relation to LCC's comments on funding, panel selection and process integrity, the Applicants confirm that best practice principles will be followed. A Design Review Panel is an independent and impartial mechanism in which expert practitioners provide objective feedback intended to improve schemes without redesigning them. This process gives authorities, who will remain in control throughout the process, the confidence to support high-quality, innovative design while resisting poorly designed proposals.</p>
ExQ2 Q2:13.1.5c	Design review process, consultation and engagement c) Bearing in mind the National Infrastructure Commission Design	Public Consultations (in a few locations and not just for the Substations area) would be a means of communicating developing designs to stakeholders and the community, at agreed stages. The presentation of	The Applicants note LCC's comments regarding the design review process and the need for meaningful community and stakeholder engagement in line with the National

Reference	ExA Question	IP submission	Applicants' response
	<p>Group's "Design principles guide for national infrastructure" (with specific reference to "people" and "places", detail the measures that would be taken and secured to ensure that there would meaningful community and interest group engagement and involvement in the ongoing substation and substation landscaping design process? Is additional drafting needed to secure this?</p>	<p>options as opposed to a finished design solution would be preferable to help develop design with opportunity for all sides to be heard and to discuss. Options should be sufficiently detailed and illustrated to enable the public to understand and be legible by using plain English and not jargon (e.g. materiality). It might be difficult to secure this through drafting but there are general guiding principles that should be adopted by the applicant in scheme development.</p> <p>At the moment LCC , have not had opportunity to communicate their landscape requirements of Landscape Design Proposals with the general public/stakeholders. This might help allay concerns. The 'People' and 'Places' elements of The Design Principles Guide for National Infrastructure' could be split into the following;</p> <p>People:</p> <ul style="list-style-type: none"> • Relocation of Bridleway/ PRoW (to some degree) (adjacent to the Dow Brook), to ensure the public can continue to enjoy views and ambience/ tranquillity; • The above relies on off site planting; existing boundary post and wire fencelines can become hedgerows with trees; and trees can be added to existing hedgerows. Both these enhance biodiversity as well as filter distant views, softening an otherwise harsh contrast; 	<p>Infrastructure Commission Design Group's Design Principles for National Infrastructure, notably <i>People</i> and <i>Places</i>.</p> <p>The Applicants do not consider that additional drafting is required to secure further commitments within the DCO. The oDP (J3/F03) provides a robust and enforceable framework to ensure that design development, including landscape measures, will be progressed in consultation with the discharging planning authority, FBC, and stakeholders, post-consent.</p> <p>This approach provides the necessary flexibility to respond to site-specific conditions and stakeholder feedback, while ensuring that the substations and associated landscaping are delivered in accordance with the principles of good design as required by the relevant National Policy Statements.</p> <p>The Applicants consider that the approach set out in the oDP appropriately balances the need for governance and flexibility, ensuring that community and stakeholder engagement can take place at appropriate stages of the detailed design process. This is consistent with the "people" and "places" principles identified by the NIC Design Group.</p> <p>While the DCO framework does not secure the precise format of consultation events, the governance mechanisms embedded in the oDP ensure that engagement remains an integral component of design development. In particular, the commitment to Design Champions provides an additional safeguard to ensure that design decisions are informed by a robust process of dialogue and review, including opportunities for local input at the discretion of FBC.</p> <p>FBC have yet to define the nature and extent of any community and stakeholder engagement, post consent. They are considering how any stakeholder engagement will be structured and what elements of the proposals will be subject to consultation, further to discussions and agreement</p>

Reference	ExA Question	IP submission	Applicants' response
		<ul style="list-style-type: none"> Off site planting to supplement boundary screening for businesses such as the Norcross Caravan Park; Off site planting within the sloped greenspace area (rough ground currently) to filter views from residents along Manor Drive; Ensure noise element has the maximum reduction; Ensure built design as noted above; <p><i>Places</i></p> <p>There seems to be a reluctance to take on board off-site planting (possibly due to potential costs, land ownership issues, and timescales), however NPSs suggest that this might be necessary to achieve good design. In the case of both substations insufficient area exists in which to mitigate effectively in addition to existing limitations arising from the location of the cables. The applicant seems to be keen to maximise the planted/landscaped area within the site boundary and whilst this is sought, it is still some way from being sufficient.</p> <p>Some elements which would be required to achieve this, in accordance with the areas landscape character include;</p> <ul style="list-style-type: none"> Small woodland blocks built into the shape and layout of the field pattern, which help screen important viewpoints, but appear more natural than a line of planting which emphasises the built development; Enabling (in the case of substations) tree planting on extended depths of 	<p>with the Applicants, which will not be defined prior to consent.</p> <p>With respect to the specific measures raised by LCC, the Applicants note the following:</p> <ul style="list-style-type: none"> Public Rights of Way and access: Public rights of ways (PRoW) identified for temporary relocation will be considered as part of the detailed design process. Where temporary diversions or realignments are necessary, these will be designed to maintain amenity, landscape character, and views, consistent with the Project Level Design Principles set out in the oDP (J3/F03), specially <i>PE2.1 PRoW amenity</i>. On- and off-site planting: The Applicants acknowledge the importance of landscape integration, biodiversity enhancement, and screening. The draft DCO commits to delivering landscaping within the Order Limits and includes provision for the restoration of removed vegetation and proposals for new planting and landscape responses. The potential for additional planting outside the Order Limits is recognised, but as is the case with all planning applications (whether NSIPs or otherwise), it is necessary to balance the taking of land for planting to mitigate identified landscape and or visual effects. The Applicants have sought to strike that balance and deliver a proportionate response to mitigation, with a focus on using the land around the substations where land is to be acquired to deliver the most effective landscape mitigation. The LVIA process did not identify the need for offsite planting works to support the mitigation strategy beyond what are now within the defined Order Limits. The scope of the EIA and the parameters secured through the draft DCO are legally and procedurally confined to land within the Order Limits. Off-site works would fall outside this statutory framework and require separate agreements or consents from landowners and the local planning authority. This approach is typical of, and

Reference	ExA Question	IP submission	Applicants' response
		<p>cables (enabled by the reduction of levels within the site area);</p> <ul style="list-style-type: none"> • Enabling greater extent of planting to areas allocated for attenuation ponds (NPSs again suggest these could be off-site); minor improvement generally; • Ponds within field areas; (rather than unnaturally placed in a random group). It was noted that there are areas of existing fields which are low lying and therefore would be wetter areas generally. Ponds replaced in these locations would also aid field drainage. Ponds scattered throughout the landscape are part of the intrinsic landscape character and add to local ecology, providing stepping stones throughout the landscape; • Built form options and development as noted above; • Relocation of Bridleway/PRoW and off site planting as noted above; • The cable corridors not having vegetation removed until required (i.e. depending on stages of construction) (i.e. Morgan before Morecambe etc.). This could reduce the 70-100m strip by circa 50%, enabling the remaining landscape to remain in place until required and enable restoration to circa 50% whilst the other route is constructed; • Advanced planting could take place in those areas which would be unaffected by construction, but would 	<p>consistent with, established practice for NSIPs, where mitigation is designed and secured within the Order Limits to ensure deliverability, enforceability, and compliance with the Rochdale Envelope.</p> <ul style="list-style-type: none"> • Attenuation features and ponds: The design principles within the oDP ensure that water management features are integrated in a manner that reflects landscape character and provides ecological benefit, in coordination with other management plans, most importantly the outline Wildlife Hazard Management Plan (S_D3_8/F03) The detailed form and location of such features will be developed post-consent in consultation with the relevant planning authority. • Phasing of construction corridors and advanced planting: The Applicants will seek to minimise the extent and duration of temporary vegetation removal along cable corridors, consistent with construction requirements and safety standards. Opportunities for advanced planting, where feasible, will be considered as part of the phasing of works, subject to land availability, construction sequencing, and timing of access prior to commencement of works. <p>This response should be read in conjunction with the Applicants response to ExQ2 13.1.8 (REP5-130).</p>

Reference	ExA Question	IP submission	Applicants' response
		<p>have the advantage of earlier establishment, especially in off-site areas which contribute to reducing visual effects.</p> <p>These options have been communicated to the applicant for several months now, but there has been a general lack of progress in developing proposals to take these into account. The Applicant appears to be focused on the proposed governance post consent and reluctant to change anything before this. LCC is concerned that there needs to be some assurance upfront that the Landscape Proposals can be updated as required above, the drafting of Requirements to ensure the development of the Landscape Proposals to the LPA's/LCC's satisfaction. Also LCC's response to Q2.13.1.1. LCC would welcome Requirements which stipulate that Landscape Proposals/Strategy should be approved by the Examining Authority pre consent and that Detail Design should only then follow for approval by the LPA.</p>	
ExQ2 Q2:16.1.2	<p>dDCO, Requirement 10 Highway accesses</p> <p>Should the Highway Access Management Plan (HAMP) be approved directly by the relevant highway authority in the same way as the Construction Traffic Management Plan (CTMP) (Requirement 9) rather than by "the relevant planning authority in consultation with the relevant highway authority" as stated</p>	<p>Yes. The County Council as the Local Highway Authority (LHA) considers that the Highway Access Management Plan (HAMP) should be approved by the relevant planning authority in consultation with the relevant highway authority.</p>	<p>The matter of approval of the Highway Access Management Plan (HAMP) was discussed between the Applicants and Lancashire County Council (LCC) at a meeting on the 25.09.2025. LCC have advised that they would have preferred approval by the relevant planning authority in consultation with the relevant highway authority but were willing to approve the plan so long as no objections were raised by the relevant planning authorities. The Applicants note that no concerns on this matter have been raised by the relevant planning authorities and consider that approval by the highway authority is most appropriate. The Applicants do not propose</p>

Reference	ExA Question	IP submission	Applicants' response																																						
	in the latest version of the dDCO [REP4-007]?		to amend the wording of Requirement 10 from that provided in the draft DCO at Deadline 5 (REP5-010).																																						
ExQ2 Q2:16.1.5a	Timing of Heavy Goods Vehicle (HGV) movements Is LCC content: a) That the revised wording of the OCTMP paragraphs 1.4.3.1 to 1.4.3.4 of [REP4-056] provides adequate control over the timing of HGVs travelling to site and prevents parking/ queuing on the public highway?	Yes, however, this is assuming that HGV parking locations are suitable (those currently presented are not suitable and further explained under b) below).	<p>Following Deadline 5 Lancashire County Council (LCC) have agreed to the Applicants requests for a series of workshops to address LCCs residual comments including upon the outline Construction Traffic Management Plan (oCTMP). LCCs comments upon HGV parking areas were discussed at a meeting on the 29.09.2025.</p> <p>The Applicants have discussed and clarified with LCC that the oCTMP (REP5-066) outlines a range of stages to manage the Transmission Assets contribution to HGV parking and waiting and these can be summarised as follows:</p> <ul style="list-style-type: none">• The first stage is the use of a booking system, this will require all deliveries to be booked in advance. This system has multiple uses, those relevant to this question include ensuring that the numbers of vehicles per day does not exceed the target, and to schedule deliveries to avoid 'bunching'. The booking system would have the benefit of ensuring that deliveries are not scheduled to arrive before 07:00.• The second stage is to issue drivers with delivery instructions, these will include details of delivery times and restrictions.• The third stage is to ensure that there is space on site for HGVs to load/unload and gates are open ready to receive vehicles such that drivers do not need to wait on the highway. <p>With these measures in place, drivers would plan their trips such that they do not arrive prior to 07:00 and are not required to wait on the highway.</p> <p>The Applicants also clarified that approximately 80 - 90% comprise of bulk materials such as aggregates. The</p>																																						
ExQ2 Q2:16.1.5b	Timing of Heavy Goods Vehicle (HGV) movements Is LCC content: b) With the list of potential HGV parking locations in table 1.1 of [REP4-056]?	<p>The LHA is currently not content with the HGV parking locations indicated in table 1.1 of [REP4-056]. The locations suggested are remote from any part of the development site and will have limited benefit, if any. The distances from the locations to the 3 access points of the proposed project are provided below.</p> <table><tr><th rowspan="2">Location</th><th rowspan="2">No. of Spaces Suggested</th><th colspan="3">Distance (miles) to:</th></tr><tr><th>A6 (Blackpool Airport)</th><th>A01 (Proposed Substation)</th><th>A61 (Penwortham National Grid Substation)</th></tr><tr><td>M6 - Junction 31A</td><td>20</td><td>19.6</td><td>18.2</td><td>12</td></tr><tr><td>M6 – South of Junction 33</td><td>60 (30 north 30 south)</td><td>27.3</td><td>20.9</td><td>22.2</td></tr><tr><td>M65 – Junction 4</td><td>20</td><td>30.2</td><td>23.8</td><td>13.8</td></tr><tr><td>M61 – North of Junction 6</td><td>150 (100 north 50 south)</td><td>32.7</td><td>21.5</td><td>16.1</td></tr><tr><td>M6 – North of junction 27</td><td>70 (35 north 35 south)</td><td>30.3</td><td>17.1</td><td>10.4</td></tr><tr><td>M58 – Junction 5</td><td>30</td><td>41.3</td><td>28.1</td><td>21.1</td></tr></table> <p>List of potential HGV parking sites are not suitable as presented.</p>	Location	No. of Spaces Suggested	Distance (miles) to:			A6 (Blackpool Airport)	A01 (Proposed Substation)	A61 (Penwortham National Grid Substation)	M6 - Junction 31A	20	19.6	18.2	12	M6 – South of Junction 33	60 (30 north 30 south)	27.3	20.9	22.2	M65 – Junction 4	20	30.2	23.8	13.8	M61 – North of Junction 6	150 (100 north 50 south)	32.7	21.5	16.1	M6 – North of junction 27	70 (35 north 35 south)	30.3	17.1	10.4	M58 – Junction 5	30	41.3	28.1	21.1	
Location	No. of Spaces Suggested	Distance (miles) to:																																							
		A6 (Blackpool Airport)	A01 (Proposed Substation)	A61 (Penwortham National Grid Substation)																																					
M6 - Junction 31A	20	19.6	18.2	12																																					
M6 – South of Junction 33	60 (30 north 30 south)	27.3	20.9	22.2																																					
M65 – Junction 4	20	30.2	23.8	13.8																																					
M61 – North of Junction 6	150 (100 north 50 south)	32.7	21.5	16.1																																					
M6 – North of junction 27	70 (35 north 35 south)	30.3	17.1	10.4																																					
M58 – Junction 5	30	41.3	28.1	21.1																																					

Reference	ExA Question	IP submission	Applicants' response
			<p>economics of transporting bulk aggregates means that they would likely be drawn from local quarries rather than further afield. When considering local quarries there would not be a requirement for overnight parking or drivers to wait. Notably, many suppliers e.g. quarries also have 07:00 to 19:00 operating restrictions.</p> <p>The Applicants acknowledge that there could be rare occasional instances where drivers are travelling from further afield and are scheduled to arrive early (e.g. for specialist loads). It is primarily for these rarer instances that the Applicants have proposed proactive measures within the oCTMP to identify locations where drivers could wait.</p> <p>Following these discussions and clarifications to LCC, LCC confirmed that they were in agreement with the locations listed for long distance HGVs but wished to see more detail at this stage upon a long list of laybys and compounds (off main routes) that could be used as holding areas for HGVs, e.g. for incidents. These updates have been made by the Applicants and are included in the oCTMP (J5/F05) submitted at Deadline 6. The Applicants shared a draft of this oCTMP with LCC on the 14 October 2025 following a series of workshops and are confident that all matters raised during this extensive engagement have been addressed. At the time of drafting this response (20 October 2025) the Applicants await LCCs final response.</p>
ExQ2 Q2:16.1.6	Links requiring HGV mitigation Is LCC content that the applicants have identified all the proposed links that potentially require mitigation measures for the safe passage of HGVs in section 1.10 of the OCTMP	The LHA is currently not content that the applicants have identified all the proposed links that potentially require mitigation measures for the safe passage of HGVs in section 1.10 of the OCTMP [REP4-056]. The OCTMP essentially splits the links in two	Following Deadline 5 Lancashire County Council (LCC) have agreed to the Applicants requests for a series of workshops to address LCCs residual comments on last leg routes. The Applicants have now undertaken selective swept path analysis as agreed with LCC to progress discussions and

Reference	ExA Question	IP submission	Applicants' response
	[REP4-056] ? If not, which links have been omitted?	<p>categories (constrained in terms of carriageway width and on-street parking).</p> <p>There are some links that the LHA identified as constrained in terms of both carriageway width and on-street parking.</p> <p>With this, Link 102 should be included on the constrained carriageway list, (currently only listed on the on-street parking list).</p> <p>Link 101 should be included in the on-street parking list (currently only under the constrained carriageway list).</p> <p>A further review has identified on-street parking on parts of the initial section of Link 43a which should also be considered.</p> <p>Link 72 has been included under the on-street parking list. The LHA have suggested consideration is given to cyclists, on the section of this link that does not form part of highway maintainable at public expense, but rather a private route with a cycle lane that the applicant proposes to use for access.</p>	<p>facilitate agreement on the deliverability of measures. The matter of last leg routes has been discussed with LCC via a series of meetings (18.09.2025, 25.09.2025, 29.09.2025 and 05.10.2025, 09.10.2025 and 13.10.2025).</p> <p>In total of the 16 links originally identified by LCC, the Applicants note that agreements in principle have been reached for all routes. The parties have agreed strategies that are deliverable within the highway boundary to manage the passage of HGVs via these links, this includes the following:</p> <ul style="list-style-type: none"> • Use of alternative accesses, e.g. removal of the Guild Wheel route and Link 30; • Localised widening, creation/improvement of passing places; • Limits on vehicle numbers and one in one out strategy (i.e. avoiding conflicting movements); • Signage to advise of local pinch points and passing areas; • Localised trimming of vegetation; • Parking management/enforcement; • Use of escort/pilot vehicles; • Localised verge profiling/maintenance; and • Driver education and induction processes.
ExQ2 Q2:16.1.8	<p>HGV Mitigation Measures</p> <p>Is LCC content that the issues on all links can be addressed in principle by the measures proposed by the applicants in paragraphs 1.10.2.1 and 1.10.2.2 and section 1.11 of the OCTMP [REP4-056]? If not, what further measures are required?</p>	<p>The LHA does not consider that the issues on all links can be addressed in principle by the measures proposed by the applicants in paragraphs 1.10.2.1 and 1.10.2.2 and section 1.11 of the OCTMP [REP4-056].</p> <p>The principles of the extents of works required have not yet been indicated, and as highlighted by the LHA in ISH2, this is typically done through the provision of swept path analysis. The LHA is still awaiting this information. An ordnance survey plan supplemented with the observations (every 50m) already collected by the applicant</p>	<p>The Applicants have agreed a description of link specific mitigation strategies to be included within the oCTMP (J5/F05) submitted at Deadline 6. These strategies will be developed post consent as part of the detailed design stage. The Applicants shared a draft of this oCTMP with LCC on the 14 October 2025 following a series of workshops and are confident that all matters raised during this extensive engagement have been addressed. At the time of drafting this</p>

Reference	ExA Question	IP submission	Applicants' response
		<p>could be used to validate and update inaccuracies within the OS data.</p> <p>Without an adequate level of indication as to the extent of the issue, the principle of mitigation cannot be determined, notwithstanding its suitability (design standards and safety) or deliverability (in engineering terms within highway boundary / land controlled by the applicant).</p> <p>Note: Paragraph 1.10.2.4 of the OCTMP states "Where road / junction widening, new/improved passing places or signage is proposed, they would be contained within the public highway". There are a number of links that will require mitigation beyond public highway to safely satisfy development needs, based upon their principles and proposed routing.</p> <p>Whilst the OCTMP proposes some generic mitigation measures, however, to support the principles (generic mitigation) requires a refinement of the Traffic Management measures/mitigation that has regard to each location/pinch point/corridor.</p> <p>The LHA is happy to consider mitigation proposals, but the principles of the mitigation measures must be demonstrated to be deliverable and operational for each specific highway link, as each link has its own unique constraints.</p> <p>On 28th August 2025, the applicant provided via email, the "Last Leg – Highway Mitigation Note" draft for submission at Deadline 5. The LHA have provided a detailed response to the applicant on 16th September 2025</p>	<p>response (20 October 2025) the Applicants await LCCs final response.</p>

Reference	ExA Question	IP submission	Applicants' response
		highlighting concerns with that currently presented and the lack of evidence to support the mitigation principles.	
ExQ2 Q2:16.1.9	HGV Mitigation Measures Is LCC satisfied with the proposed process for agreeing, implementing and monitoring measures to address issues on the links set out in table 3-1 of [REP4-113] and paragraphs 1.10.2.3 to 1.10.2.8 of the OCTMP [REP4-056] ?	<p>The LHA is not satisfied with the following elements of Table 3-1 of [REP4- 113] at this stage:</p> <p>Stage 1 d) - Highway envelope has not been fully considered. Where highway envelope measurements are provided, they appear to include existing footway. Whilst this is not an issue for areas of oversailing, they cannot be included in areas considered for widenings or passing places as the removal / reduction of sustainable infrastructure will NOT be supported. Where the highway envelope for oversailing of vehicles is considered, regard has not been had to high foliage / dense shrubs (which also affects forward visibility and positioning of vehicles) will impact the extent of highway that can be "over sailed". No regard has also been had to the horizontal alignment of the road, i.e., swept paths, which increases the required width of carriageway.</p> <p>Stage 2 – The document "Last Leg – Highway Mitigation Note" has been provided to LCC Highways on 28th August 2025. Detailed comments and concerns with the document were sent back to the applicant on 16th September 2025. LCC Highways do not agree with the carriageway and highway envelope widths presented by the applicant to be suitable for 2-way HGV movements.</p> <p>Elements of Table 3-1 of [REP4-113] currently outstanding:</p>	

Reference	ExA Question	IP submission	Applicants' response
		<ul style="list-style-type: none"> Stage 3 - Workshop with LCC Highways which is scheduled for 18th September 2025. Stage 4 – As of 17th September 2025, the LHA are currently awaiting an updated SoCG. <p>With regards to Paragraphs 1.10.2.3 to 1.10.2.8 of the OCTMP [REP4-056], the proposed process for agreeing and implementing highway works under Section 278 of the Highways Act 1980 is supported. However, no reference is made to monitoring measures within these paragraphs.</p>	
ExQ2 Q2:16.1.10	HGV Mitigation Measures Confirm that all the proposed mitigation measures (including the provision of localised passing places and the widening of pinch points) can be accommodated within the order limits or highway land.	This covered within the response to Q2:16.1.8 above. Sufficient information regarding the required mitigation has not been presented to date, therefore, the accommodation of any such mitigation within the order limits or highway land cannot be confirmed at this stage. There are significant concerns that these measures cannot be delivered to a level that mitigates the development's impacts on these corridors, within highway land.	
ExQ2 Q2:16.1.11	Crossing points The applicants provided data on daily heavy vehicle movements to construction accesses including crossing points in table 2-1 of [REP4-113]. Given this data, is LCC content with the crossing points proposed?	The LHA does not have concerns with the proposed HGVs numbers at crossing points, for the maximum design scenario, as presented. It is important that these HGV levels (averages and maximum) are not exceeded, as these have been derived from the maximum design scenario, and HGV movements are monitored. The monitoring process has not yet been agreed in principle. Whilst the monitoring of HGV movements at	Following Deadline 5 Lancashire County Council (LCC) have agreed to the Applicants requests for a series of workshops to address LCCs residual comments including upon the outline Construction Traffic Management Plan (oCTMP). LCCs comments upon HGV monitoring were discussed at a meeting on the 29.09.2025 and the Applicants were able to provide clarification and direction to LCC upon how matters were addressed through the oCTMP. The Applicants explained that the oCTMP outlines a range of stages to manage the

Reference	ExA Question	IP submission	Applicants' response
		<p>accesses is not unreasonable, at this stage, insufficient information has been presented on how monitoring will be undertaken on individual links, to ensure HGVs comply with the presented routing strategy, with their suitability having regard to their constraints (with mitigation yet to be concluded).</p>	<p>Transmission Assets contribution to monitoring HGV numbers and routes these can be summarised as follows:</p> <ul style="list-style-type: none"> • The first stage is the use of a booking system, this will require all deliveries to be booked in advance. This system has multiple uses, these include ensuring that the numbers of vehicles per day does not exceed the target and to capture further information, such as: <ul style="list-style-type: none"> ○ Origin and destination, thereby confirming routes; ○ Vehicle registration and markings – allowing for checking of any reported non-compliance. • The second stage is to issue drivers with delivery instructions, these will include details of delivery times, routes and restrictions allowing drivers to plan their route and ensure compliance. • The third stage comprises of route monitoring, allowing for monitoring and auditing of routes used. This includes commitments to: <ul style="list-style-type: none"> ○ Vehicle tracking software. These types of software is in the Applicants' advisor's experience becoming increasingly common and allows contractors and the supply chain to audit routes used by drivers. ○ Unique identifiers. The use of an identifier in the widow of an HGV has proven useful on other projects to highlight to the public where a driver may be employed on a project and avoid miss reporting. • The fourth stage comprises of a check at the gate. The oCTMP includes commitments to monitoring vehicles, numbers, times and registration plates at gates, this would allow for auditing of the booking system. <p>Following these clarifications, LCC requested minor revisions to the oCTMP, notably these include:</p>

Reference	ExA Question	IP submission	Applicants' response
			<ul style="list-style-type: none"> • Revisions to the existing commitment on vehicle HGV tracking and to share data with LCC if requested. • Clarification upon the content of the monthly monitoring reports. • The requirement to provide and share any recorded dash cam footage (subject to data protection). • Further detail to manage non-compliance, including a timeline for reporting breaches and a suggested approach to corrective action. <p>These updates have been made by the Applicants and are included in the oCTMP (J5/F06) submitted at Deadline 6. The Applicants shared a draft of this oCTMP with LCC on the 14 October 2025 following a series of workshops and are confident that all matters raised during this extensive engagement have been addressed. At the time of drafting this response (20 October 2025) the Applicants await LCCs final response.</p>
ExQ2 Q2:16.1.12	<p>Final form of agreement for highway works</p> <p>Confirm your understanding of the powers under which works to the highway will be undertaken (including mitigation measures for the safe passage of HGVs, the construction of accesses and any works associated with the movement of Abnormal Indivisible Loads).</p>	<p>Section 278 of the Highways Act 1980 will be used for works to the highway (mitigation, accesses, abnormal load works, remediation and maintenance). This will be undertaken under a complicated bespoke Section 278 agreement. It may be the case at detailed design stage that the LHA may choose to use Section 59 of the Highway Act 1980 for highway maintenance. It is important that all routes used are maintained at the highest levels to limit the possibility of road closures impacting upon existing users as well as the proposed project, thus highlighting the importance of highway monitoring funded by this development, as previously discussed in ISH2.</p>	<p>The Applicants note this response.</p>

Reference	ExA Question	IP submission	Applicants' response
ExQ2 Q2:16.1.13	Preston Guild Wheel Cycle Route Is LCC content with the proposed usage of the A583 overbridge on the Preston Guild Wheel Cycle Route set out in paragraph 1.12.5.1 of the OCTMP [REP4-056] (i.e. approximately 12 movements a day six in and six out) and the associated safety measures proposed set out in paragraphs 1.12.5.2 to 1.12.5.5?	As highlighted at the Issue Specific Hearings, the LHA is not content with the proposed usage of the A583 overbridge on the Preston Guild Wheel Cycle Route set out in paragraph 1.12.5.1 of the OCTMP [REP4-056] (i.e. approximately 12 movements a day six in and six out) and the associated safety measures proposed set out in paragraphs 1.12.5.2 to 1.12.5.5. Further information provided to the LHA via email, indicates that in addition to the average cyclist movements observed during the survey, a peloton of 63 cyclists was identified on one weekday at 14:30, (this is not included in the calculation of average movements). Notwithstanding the principle of this popular and well-used route for cycling, walking and dog-walking being used for HGVs, sufficient information has not been provided on where any users (individual or groups) will be suitably and safely held and for how long.	The Applicants have expressed a willingness to work with Lancashire County Council (LCC) to find proportionate solutions to traffic concerns/ clarifications. Noting that LCC continued to express concerns with the use of the Guild Wheel (with detailed mitigation measures) the Applicants have engaged with the internal engineering team and developed an alternative access strategy, allowing the removal the access over the Guild Wheel. The removal of this access was reflected in an update to the outline Construction Traffic Management Plan (REP5-066) and the outline Public Rights of Way Management Plan (REP5-057) at Deadline 5. Updates all other documents, including the outline Highway Access Management Plan (J8/F06), Access to Works Plan (B11/F03), Works Plan (B7/F05), Street Works Plans (B12/F05) and draft DCO (C1/F09) have been updated at Deadline 6 to reflect the removal of the Guild Wheel access.
ExQ2 Q2:16.1.6	Preliminary access design Is LCC content with the preliminary access design information contained in table 1.1 of the Outline Highway Access Management Plan (OHAMP) [REP4-060] ?	The LHA is not content with the preliminary access design information contained in table 1.1 of the Outline Highway Access Management Plan (OHAMP) [REP4-060] . The following accesses are yet to be resolved: <ul style="list-style-type: none">- A33 (very theoretical swept paths provided, hedgerow to be removed is not shown, supporting link is not wide enough for movements);- A44 to A47 (30mph speed limit proposed, insufficient detail on	Following Deadline 5 Lancashire County Council (LCC) have agreed to the Applicants requests for a series of workshops to address LCCs residual comments on traffic matters. The matter of access designs (including the change request) has been discussed with LCC at a meeting on the 25.09.2025 and the parties have agreed that subject to minor revisions to the outline Highways Access Management Plan (oHAMP) that all matters can be agreed. These updates have been made by the Applicants and are included in the oHAMP (J8/F06) submitted at Deadline 6. The Applicants shared a draft of this oHAMP with LCC on the 15 October 2025 following a series of workshops and are

Reference	ExA Question	IP submission	Applicants' response
		<p>enforcement, visibility splays required to be increased);</p> <ul style="list-style-type: none"> - A53 (visibility splay required to be increased); - A57 (LHA concerns highlighted within answer to Q2:16.1.13); - A58 (unclear how cyclists will be managed at the access); and - A59 (visibility to the west required, supporting link not suitable for 2-way HGV movements). <p>The LHA have been unable to locate any proposals to overcome the concerns previously raised with these accesses.</p> <p>In addition, access A9 is included within Table 1.1 of [REP4-060] but no longer shown on the preliminary access plans below the table. The LHA were previously asked to consider proposals for access A9b to be included as part of a change request. This access is not included within Table 1.1 or shown in the plans. Further clarity is required on these accesses.</p>	<p>confident that all matters raised during this extensive engagement have been addressed. At the time of drafting this response (20 October 2025) the Applicants await LCCs final response.</p>
ExQ2 Q2:16.1.7	<p>Treatment of accesses no longer required</p> <p>Is LCC content with proposals to address accesses that are no longer required for the construction of one of the proposed projects set out in paragraph 1.4.3.4 of the OHAMP [REP4-060]?</p>	<p>The LHA is content with proposals to address accesses that are no longer required for the construction of one of the proposed projects set out in paragraph 1.4.3.4 of the OHAMP [REP4-060]. However, this should be agreed with the local planning authority, in consultation with the local highway authority, rather than as currently worded.</p>	<p>The Applicants welcome Lancashire County Councils confirmation that they are content with the proposals. In regard to the proposed agreement mechanisms, the Applicants refer to their response to ExQ2 Q2:16.1.2 on this matter.</p>

Reference	ExA Question	IP submission	Applicants' response
DCO Q1:1.3	<p>Article 7 – Application and modification of legislative provisions</p> <p>Can the parties provide an update on the progress of negotiations on the matters within Article 7? Where any agreement has not been reached, please provide an agreed timetable for resolution prior to the end of the examination.</p>	<p>The County Council have had further discussions on this matter in relation to the Land Drainage Act provisions with Article 7. A further draft of the Protective Provisions has been discussed between the County Council and the applicant and it is expected that the remaining outstanding issues will be resolved before deadline 6.</p>	<p>Please refer to the Statutory Undertakers Negotiations Tracker (S_D3_10/F04).</p>
DCO Q1:1.5a	<p>Article 10 – Power to alter layout etc. of streets</p> <p>At issue specific hearing 3 (ISH3) the applicants explained [REP4-106] they are in ongoing discussion with LCC regarding how a section 278 agreement could also apply to these works.</p> <p>a) Provide an update on these discussions and relevant to this article.</p>	<p>Simple initial discussions have been had with the layouts to support a Section 278 agreement. No further discussion on the agreement, the type of agreement or its content has been had. Requirements of the complex agreement are highlighted within the LCC response to Q2:16.1.12.</p>	<p>The Applicants and LCC engaged on article 10 during Issue Specific Hearing 4 as recorded in the Applicants' hearing summary of ISH4 (S_D6_12). The Applicants explained that it was normal and appropriate that the article does not include further detail on the procedure for obtaining consent under article 10, similar to the approach taken in the requirements at Schedules 2A and 2B. It is standard in the DCO consenting regime that the exact process for entering into agreements with highway authorities isn't fixed at this stage, given these agreements form part of ongoing engagement with the highway authorities as part of detailed design.</p>
DCO Q1:1.5b	<p>Article 10 – Power to alter layout etc. of streets</p> <p>b) Given the apparent uncertainty regarding the need for the power to apply generally to land outside of the order limits, and bearing in mind that the article could also possibly apply to streets beyond the remit of LCC as the highway authority, why can any necessary approvals for such works</p>	<p>A similar agreement can be made with neighbouring highway authorities. Any land requirements beyond that which is maintainable at public expense can only be progressed by the developer's agreement with those land owners, where land is required for agreed further changes. Any land that is required as part of mitigation works for this development, that would also be available for public use (e.g. widenings)</p>	<p>The Applicants refer to their response to ExQ2 Q2:16.1.6 on this matter which confirms that through discussions with LCC, mitigation strategies have been developed that can be delivered within the highway boundary.</p>

Reference	ExA Question	IP submission	Applicants' response
	outside of the order limits not be subject to the usual controls and approvals that are routinely sought from the relevant highway authority?	would be required to be dedicated to the LHA. <i>Note i: LCC would not own the subsoil to that land.</i> <i>Note ii: Access points would remain in the ownership of land owners.</i>	
DCO Q1:3.1a	Requirement 1 – Time limits a) The Examining Authority (ExA) notes the decision of the SoS to allow a 7-year commencement period in the Morgan Offshore Wind Project Generation Assets Order 2025 ("Morgan"). However, that project is entirely offshore and does not lead to and has not considered the potential onshore effects on local communities that could arise from the proposed development in this case (the transmission assets). Therefore, notwithstanding the Morgan decision, would a reduced commencement period of 5 years be justifiable for the transmission assets development taking into consideration the implications this may have including for landowners and local communities?	Yes, the County Council considers that five years would be justifiable, given the impacts of the project.	The Applicants note this response. The Applicants would refer to their response to Hearing Action Point [XX] which relates to this point. The Applicants maintain a 7 year period is justified but following further discussion with the Examining Authority at Compulsory Acquisition Hearing 3 and acknowledging that the transmission assets of each project will be constructed with the associated generation assets, have made amendments to Requirement 1 of Schedules 2A and 2B of the draft DCO (C1/F09) at Deadline 6 to to link the seven year time period for implementing the Morgan element of the Transmission Assets to the date the Morgan Offshore Wind Project Generation Assets Order 2025 came into force. The Applicants have made the same amendment for Project B (the Morecambe transmission assets), noting that the application for the Morecambe Offshore Windfarm Generation Assets Order (Morecambe Generation Order) remains subject to decision and therefore the date of the Morecambe Generation Order has been left blank in the drafting updates.
DCO Q1:3.1b	Requirement 1 – Time limits b) In the event that the SoS considers that the maximum time period between projects should be reduced by two years or more, what drafting implications would this have for the	the timescale for the discharge of other individual Requirements may need to be amended to reflect the shorter commencement date.	The Applicants note this response and would refer to the Applicants' response to this Written Question as submitted at Deadline 5 (REP5-141).

Reference	ExA Question	IP submission	Applicants' response
	Development Consent Order (DCO) and any other certified documents?		
DCO Q1:3.1c	Requirement 1 – Time limits c) The SoS, in granting the Morgan DCO removed the provision for an additional year to deal with any judicial review as he considered that any delay caused by a judicial review will not have a significant impact set against the 7-year overall period. Notwithstanding the matters raised above, the ExA suggests that Requirement 1(2) is similarly deleted.	Yes, the County Council agrees; five years is still significantly greater than the implementation period for TCPA 1990 decisions	The Applicants note this response and would refer to the Applicants' response to this Written Question as submitted at Deadline 5 (REP5-141) and row Q1:3.1a above. In addition, the Applicants would note that DCOs generally have a longer implementation period due to the complexity of the development, in comparison to majority of planning permissions granted pursuant to the Town and Country Planning Act 1990. In addition, as the Transmission Assets DCO would authorise two sets of transmission works, 7 years is considered both appropriate and justified, as supported by previous 'joint' DCOs such as The Sheringham and Dudgeon Extensions Offshore Wind Farm Order 2024.
DCO Q1:3.7	Requirement 6 – Provision of landscaping Should 6(2) of this requirement also include details of existing trees and hedgerows to be retained and those to be removed, given that such details are likely to be factors in the consideration of the acceptability of a proposed landscaping scheme?	Yes, the County Council supports this. In terms of vegetation retention there should also be some control regarding how retained vegetation will be protected from damage during works	The Applicants note this response and would refer to the Applicants' response to this Written Question as submitted at Deadline 5 (REP5-141). The Applicants also refer to further updates to the outline Arboriculture Method Statement (S_D5_10/F02) at Deadline 6. Paragraph 1.5.1.1 of the Outline Arboriculture Method Statement (S_D5_10/F02) has been updated at Deadline 6 to state that a detailed schedule and plan (aligned with BS5837:2012) of all trees and hedgerows to be removed, protected and retained will be provided as part of the detailed AMS(s). The Applicants maintain that vegetation retention is therefore adequately addressed.
DCO Q1:3.8	Requirement 7 – Implementation and establishment of landscaping Are the Councils satisfied with the approach taken by the applicants in	There needs to be some consistency regarding the maintenance period or at least some clarity that any longer maintenance period through the Ecological Management	The outline Landscape Management Plan (J2/F05) has been updated to provide further clarity around the duration of management and monitoring measures. Section 1.5.1.2 confirms that landscape management measures with the

Reference	ExA Question	IP submission	Applicants' response
	distinguishing between the 'establishment' of landscaping through Requirement 7 and the further maintenance of landscaping which the applicants explain would be secured through the outline Ecological Management Plan [REP4-059]? If not, please suggest how this might be resolved?	Plan does not relate to tree and hedge planting undertaken under Requirement 7.	onshore export cable corridor and 400kV cable corridor will be carried out for a maximum of 10 years. At the substations landscape management measures will be carried out for a minimum of 10 years with the expectation that this will be carried out for the operational lifetime of each substation. This is to ensure establishment of plants in accordance with Requirement 7(3) of Schedules 2A and 2B of the draft DCO (REP5a-018).
DCO Q1:3.9	<p>Requirement 10 – Highway accesses</p> <p>As discussed at ISH3, this requirement has been amended in the draft DCO [REP4-008] at deadline 4 (D4).</p> <p>Is LCC content with the revised wording? If not, what potential drafting changes are suggested?</p>	The LHA is content with the revised wording for the implementation of the accesses. However, requirement 10 as currently presented does not consider the maintenance or removal / reinstatement of the accesses and that to support the access (e.g. hedges, walls, signals, signs and kerbing etc).	The Applicants refer to their comments during ISH4, Day 2 (S_D6_13). The Applicants highlighted that Requirement 10 of Schedule 2A and 2B is focused on the approval of the highway access designs. Requirement 10 follows well-precedented DCO drafting. It is not intended that this requirement wording should cover maintenance or reinstatement of highway accesses. The Applicants highlighted that paragraph 1.13.2.7 of the oCTMP (REP5-066) sets out the process for agreeing a remediation strategy with the relevant highway authority which is standard practice. The Applicants also noted that restoration of highway accesses would need to align with the restoration provisions for those parts of the accesses on private land, which is secured through Requirement 16 of Schedules 2A and 2B (REP5a-018).
DCO Q1:3.10	<p>Requirement 11 – Onshore archaeology</p> <p>The applicants have made further amendments to this requirement at D4 [REP4-008]. Is LCC content with the revised wording? If not, what potential drafting changes are suggested?</p>	If the phrase "no stage of the ...onshore works...or intertidal works" can be taken to mean to apply to any aspect of Projects A & B that require ground disturbance, then the proposed wording change is still considered to give the County Council sufficient control over the nature and timing of any archaeological works to be undertaken and would therefore be acceptable.	The Applicants note this response.

Reference	ExA Question	IP submission	Applicants' response
DCO Q1:3.11	<p>Requirement 12 – Ecological management plan</p> <p>The applicants have made further amendments to this requirement at D4 [REP4-008].</p> <p>a) Are BAE Systems, Blackpool Airport Operations Ltd and the Councils content with the revised wording? If not, what potential drafting changes are suggested?</p> <p>b) What is the latest position between LCC and the applicants on the points raised by LCC in paragraph 3.19 of [REP4-136]?</p>	<p>a) The County Council has no comments on the revised wording.</p> <p>b) The County Council has not been consulted further by the applicants on this matter.</p>	<p>a) Noted</p> <p>b) The Applicants refer Lancashire County Council to row REP4-136.22 of Annex 2.3 to the Applicants' Response to Deadline 4 submissions from Statutory Consultees and other organisation: Lancashire County Council (AS-086).</p>
DCO Q1:3.12a, e	<p>Requirement 14 – Construction hours</p> <p>a) 14(2) refers to works that may take place outside of the hours specified in sub-paragraph (1) for certain identified works. Should the last word of this opening sentence therefore say "comprising" rather than "including" as the later indicates that it is not a closed list?</p> <p>e) Whilst noting the amendment already made to Saturday working hours, would it be reasonable to push forward the start time of construction works on Saturdays from 0700 to 0800, given that there may generally be an expectation for less disturbance on Saturday mornings in comparison to weekday mornings?</p>	<p>a) The County Council agrees.</p> <p>e) The County Council agrees that it would be reasonable to push forward the start time of construction works on Saturdays from 0700 to 0800 where works are proposed with 200m of noise sensitive properties.</p>	<p>The Applicants note that from discussions with the County Council, and exploration of this point during the most recent Issue Specific Hearing, that all points relating to construction working hours are now agreed with the exception of the County Council's request to change the start time for construction works on Saturdays. The Applicants maintain that the currently proposed construction hours are necessary, proportionate and justified to ensure efficient delivery of the Transmission Assets.</p>

Reference	ExA Question	IP submission	Applicants' response
DCO Q1:3.13a	<p>Requirement 14 – Construction hours</p> <p>LCC makes a suggestion (paragraph 3.22 of REP4-136) for later construction start times of 0800 in locations within 200 metres of a residential property.</p> <p>a) Can LCC explain further its justification for this suggestion with examples of what forms of noise and disturbance it considers would be unacceptable before 0800, taking account of any relevant noise mitigation proposed by the applicants?</p>	Noise impacts from use of excavators or other mechanical construction plant.	Noted
DCO Q1:3.14	<p>Requirement 16 – Restoration of land used temporarily for construction</p> <p>The applicants have made further amendments to this requirement at D4 [REP4-008].</p> <p>a) Is FBC and LCC content with the revised wording? If not, what potential drafting changes are suggested?</p> <p>b) What further measures and drafting be provided to resolve the concerns of FBC and Lancashire County Council in paragraphs 3.2 and 3.3 of [REP-136]</p>	Wording appears acceptable - 16(1) should be approved in writing – not agreed	The Applicants note this response and have updated the draft DCO at Deadline 6 to reflect this [C1/F09].
DCO Q1:3.17	<p>Requirement 20 – Operational drainage management plan</p> <p>a) This requirement needs amendment to only refer to the lead</p>	The LLFA recommends that that the DCO is amended to reflect that the responsibility for the approval of the detailed Operational Drainage Management Plan is to sit with the relevant local planning authority, in	The Applicants can confirm this wording was updated at Deadline 5.

Reference	ExA Question	IP submission	Applicants' response
	<p>local flood authority as discussed at ISH3 [REP4-106].</p> <p>b) Notwithstanding the above, do LCC and FBC have any remaining concerns about the responsibility for approval of this plan?</p>	<p>consultation with the lead local flood authority, highway authority and Environment Agency.</p> <p>This is to reflect the roles that those authorities have for various aspects of drainage and flood risks, and that the LLFA, Highway Authority and the Environment Agency currently have no legal means to 'approve' drainage strategies and other matters (like flood risk assessments). Only the Local Planning Authority has the legal means to 'approve' these documents and plans associated with a planning application or the Requirements of a Development Consent Order, where approval the details is identified as being for their approval.</p> <p>Given the proposals for local government reorganisation, the relevant local planning authority, lead local flood authority and highway authority may change in the future so it is recommend that the wording of the DCO is worded in such a way that is future proofed.</p> <p>The LLFA has communicated this to the applicants and proposed an amended wording for Requirement 20(1) so that it states:</p> <p>“(1) Work No. 21A must not commence until, for that work, an operational drainage management plan (in accordance with the outline operational drainage management plan) has been submitted to and approved by the relevant local planning authority in consultation with the lead local flood authority, the highway authority, and the</p>	

Reference	ExA Question	IP submission	Applicants' response
		Environment Agency. The operational drainage management plan must be substantially in accordance with the principles set out in the outline operational drainage management plan".	
DCO Q1:3.19	<p>Requirement 25 – Onshore collaboration</p> <p>a) In the event of overlapping construction work programmes between the two projects (which is understood to be a possible scenario), do definitions of “sequential” and “concurrent” construction need to be provided or alternative wording to cover an overlapping scenario?</p> <p>b) What progress has been made between the applicants and FBC regarding the Council’s concerns about collaboration at D4 [section 2.1 of REP4-134]?</p> <p>c) Do the local authorities have any outstanding comments on the drafting of this requirement, including any suggested alternative drafting should concerns remain?</p>	It is not clear exactly what Requirement 25 is trying to achieve and how it would be implemented/enforced. The main issue appears to be making sure there is a defined responsibility for restoration responsibilities in any scenario and in terms of a sequential approach, how restoration would be phased and the allowable limits of restoration deferment between the first project ending and the second project commencing. How much time should be allowed after the completion of the first project before all restoration must be implemented? It is considered that there should be a review at the time the first project commences as to the likely programming of the second project and at that point a scheme should be submitted for the phasing and restoration of the overall scheme.	The Applicants would refer to their response at ExQ2 Q2:1.1.1 above. The CCWG would facilitate discussions in relation to restoration between the projects, insofar as this is not already secured in the appropriate management plans.
DCO Q1:3.20a	<p>Requirement 26 – Biodiversity benefit</p> <p>The applicants explain in the Explanatory Memorandum [REP4-009] that this newly drafted requirement is being offered on a without prejudice basis subject to compulsory acquisition powers being</p>	In relation to Requirement 26, REP4-009 (Paragraph 1.7.2.24) states that "It provides that, unless otherwise agreed with the relevant planning authority, written evidence (in the form of the outputs of the biodiversity metric) demonstrating how biodiversity benefit in accordance with the onshore biodiversity benefit statement is to be delivered as part of Project A must be	The Applicants note that Requirement 26 has been updated within the draft DCO (C1/F09) as submitted at Deadline 6. This requires that a biodiversity benefit scheme (in accordance with the onshore biodiversity benefit plan) must be submitted to the relevant planning authority for approval in writing, in consultation with the statutory nature conservation body. This will set out how at least ten per cent biodiversity benefit has been delivered in respect of the

Reference	ExA Question	IP submission	Applicants' response
	<p>granted for the biodiversity benefit areas.</p> <p>a) Are the local authorities and parish councils' content with the revised wording? If not, what potential drafting changes are suggested?</p>	<p>submitted to the relevant planning authority no later than the date on which Project A is first brought into operation".</p> <p>The County Council suggests that the written evidence must be submitted and approved by the LPA by the stated date.</p>	<p>permanent-above ground substation infrastructure, and how biodiversity benefit will be provided for other elements of the scheme.</p>
DCO Q1:3.21	<p>Suggested additional requirements</p> <p>In response to ISH3.35 of the hearing action points [REP4-108], the applicants set out their response to several additional requirements that have been suggested by the local authorities.</p> <p>Are the Councils satisfied with the responses provided to each of these suggested requirements? If not please provide justification for your position and suggested drafting of any additional requirement that you still consider to be necessary?</p>	<p>Provided the issues raised in the County Council's LIR are addressed in the relevant management plans to be submitted in accordance with Requirement Nos. 6, 8, 9, 10, 12 and 20, this should be sufficient without needing any further requirements.</p>	<p>The Applicants note this response.</p>
DCO Q1:5.3	<p>Comments on drafting</p> <p>Do any of the Councils have any remaining outstanding concerns regarding the content of Schedule 12?</p>	<p>The County Council is concerned that paragraph 3 of Schedule 12 provides for a ten week period for determination of applications of the discharge of Requirements. This may not be sufficient in relation to some requirements, particularly where consultation with external consultees is required. The County Council does note that the paragraph 3(b) does make provision for the agreement of "such other period as may be specified in a requirement or otherwise agreed by the undertaker and the relevant planning authority", which is welcome.</p>	<p>The Applicants note LCC's comments and highlight that the inclusion of the wording 'such other period as may be specified in a requirement or otherwise agreed by the undertaker and the relevant planning authority' is aimed directly at the situation where the 10 week period is not sufficient to discharge a requirement. This is considered to be a well precedented, reasonable and proportionate approach to discharge of requirements. Clearly, if a discharging authority needs additional time, it is in the interests of the Applicants to agree to that, otherwise the</p>

Reference	ExA Question	IP submission	Applicants' response
			discharging authority may have to refuse the application on the basis of insufficient information.

Table 2-2: REP5-174 – Lancashire County Council (Appendix A – Landscape Comments on the Outline Design Principles)

Reference	IP submission	Applicants' response
REP5-174 174.1	<p>1.0 Introduction</p> <p>1.1 This document J3 Outline Design Principles (as above) WIP overlaps with the recent Applicant document 'Proposed updates to the outline Design Principles document for Deadline 5). Document Reference: SoCG August 2025 F01. Comments on this were documented 03 September 2025 (also attached). It is unclear what, when and if all documents and comments have been submitted and viewed by the Applicant?</p> <p>1.2 The References refer to the WIP document.</p>	<p>The Applicants acknowledge LCC's attendance at the Joint Council Meeting on 3 September but note that no comments have been received on the document shared by the Applicants titled <i>The Applicants' proposed updates to the outline Design Principles document for Deadline 5</i>.</p> <p>As a response to Joint Council Meeting on 14 August, and agreed as an action for the Applicant, this proposal document sought to outline how the oDP would function as the central mechanism within the DCO; identifying those substation components where flexibility may be accommodated and those subject to fixed requirements, alongside refinements to the Design Principles and Design Codes.</p> <p>The Applicants note that LCC's subsequent comments relate to the work-in-progress (WIP) document circulated to the Councils on 5 September 2025.</p> <p>Further to LCC's submission at Deadline 5, subsequent commentary has been shared by LCC with the Applicants, entitled: '<i>DEADLINE 6 - RESPONSE TO LANDSCAPE MATTERS; relating to landscape Comments by LCC Landscape Architect on Outline Design Principles J3/F02_22 September 2025</i>' (dated 14.10.25).</p>
REP5-174 174.2	<p>2.0 Landscape Comments</p> <p>2.1 Ref 1.4.1.1: The document seems to concentrate on the Substation Design rather than the whole length of the development. The Substations are one part of the overall scheme. The whole development should be referenced.</p>	<p>The Applicants note LCC's observation and confirm that it is addressed within the updated Outline Design Principles (oDP) (J3/F03) submitted at Deadline 6.</p>
REP5-174 174.3	<p>2.2 Ref 1.3.1.1: Note with regards to what has been achieved-states 'has been integrated...into post consent detailed design'. This is not yet the case and therefore change use of tense to conditional.</p>	<p>The Applicants note LCC's observation and confirm that it is addressed within the updated oDP (J3/F03) submitted at Deadline 6.</p>

Reference	IP submission	Applicants' response
REP5-174 174.4	2.3 Ref 1.3.1.12: there is concern that the key design parameters and Commitments will not be sufficiently detailed and agreed prior to any consent. If they are not agreed and are incomplete as far as LCC Landscape is concerned, then whatever is proposed post consent is also weakened and would not achieve landscape proposals which fulfil the 'Design principles Guide for national infrastructure' (People and Places).	The Applicants note LCC's observation and confirm that it is addressed within the updated oDP (J3/F03) submitted at Deadline 6.
REP5-174 174.5	2.4 Ref 2.1.1.1 and 2.2 generally: A reiteration of 2.1 above.	The Applicants note LCC's observation and confirm that it is addressed within the updated oDP (J3/F03) submitted at Deadline 6.
REP5-174 174.6	2.5 Ref 2.2.2.1: Regarding the Morecambe Substation it is noted that the Bridleway is north of the site and a PRoW to the east (and other PRoW to the south).	The Applicants note LCC's observation and confirm that it is addressed within the updated oDP (J3/F03) submitted at Deadline 6.
REP5-174 174.7	2.6 Ref 2.2.2.1: Regarding Morecambe there is no reference to the ridgeline and the level difference particularly to the south which is very flat and presents open views of the Proposed Substation site.	The Applicants note LCC's observation and confirm that it is addressed within the updated oDP (J3/F03) submitted at Deadline 6.
REP5-174 174.8	2.7 Ref 2.2.3.3-4: Surely if a soil medium has low permeability it would therefore contribute to surface water flow? The paragraph acknowledges the presence of many small ponds. These are part of the landscape character and have ecological benefit, as well as having the ability to help drain field areas. They should be reinstated wherever lost the length of the cable corridor and to field areas for Substation sites.	The Applicants note LCC's observation. The detailed design and incorporation of ponds will be addressed through the post-consent design process, in accordance with relevant management plans and in consultation with Fylde Borough Council (FBC), consistent with the governance arrangements set out in Section 6 of the oDP (J3/F03).
REP5-174 174.9	2.8 Ref 2.2.5.6: The setting to the asset is also considered paramount in terms of any historic element.	The Applicants note LCC's observation. Consideration of the substations' design in relation to relevant historic assets formed part of the site selection process and will be further addressed through the detailed design process post-consent, in accordance with the governance arrangements outlined in Section 6 of the oDP (J3/F03).
REP5-174 174.10	2.9 Ref 2.2.6.2: Over emphasis on urban, the area is predominantly rural and agricultural and query where the marginal upland areas are within the site area?	The Applicants note LCC's observation.

Reference	IP submission	Applicants' response
REP5-174 174.11	2.10 Ref 3.1/3.2: As 2.1 above- not just the Substation areas, but the whole length of the proposed development.	The Applicants note LCC's observation and confirm that it is addressed within the updated oDP (J3/F03) submitted at Deadline 6.
REP5-174 174.12	2.11 Ref 2.2.6.5: The Landscape Character Strategy for Lancashire (2000) is somewhat out of date and it would be desirable to update the document. The Landscape Institute recognises this is the situation with many LPA's & CC's and recommends that Developers should carry out supplementary Landscape Character Assessments. This has happened on LCC Proposed Highway schemes. No update has been provided here. Both Landscape Architects involved for the Councils have either detailed experience of Landscape Character Assessment and/ or significant knowledge of Fylde Landscapes and therefore have hoped to guide any proposals accordingly.	<p>The Applicants note LCC's comments regarding the age of the published landscape character assessment for Lancashire.</p> <p>It is not for the Applicants to comment on whether or not it is desirable to update this document, which is a Council decision. The Applicants do note that, in line with best practice and guidance from the Landscape Institute, their assessment on landscape character was undertaken based on the published landscape character document and the observations of the qualified practitioner during visits to the area in support of the Applicants' assessment.</p> <p>The Applicants have welcomed the observations of LCC's and FBC's appointed landscape architects, both during the Examination and prior to submission. The local knowledge of the officers of the discharging authority will also be invaluable has part of the post consent design process.</p>
REP5-174 174.13	2.12 Ref 2.2.6 refers to generalities and does not describe landscape character specific to the site. (other than 2.2.6.2) It is easy to recognise some of the characteristics noted in the NCA, such as the frequent ponds, hedgerows, small woodland blocks, agriculture pasture and arable, field pattern etc. and perhaps more could be noted on this, as these are the characteristics to aim to be retained.	The Applicants note LCC's observation and confirm that it is addressed within the updated oDP (J3/F03) submitted at Deadline 6.
REP5-174 174.14	2.13 Ref 2.2.7: More could be noted re: PRoW (cross reference?) and Bridleway. Need to be specific re: Substation sites? Very general.	The Applicants note LCC's observation and confirm that it is addressed within the updated oDP (J3/F03) submitted at Deadline 6.
REP5-174 174.15	2.14 Ref 2.2.7.3: nothing yet noted on Green Belt and whole of Design Implications sections not yet noted.	<p>The Applicants acknowledge LCC's comment.</p> <p>In review of the work-in-progress document, it was recognised that Green Belt is a spatial planning policy designation rather than an environmental topic. While it is acknowledged that 'spatial openness' associated with Green Belt policy has a relationship with the consideration of landscape and visual resources. Accordingly, these interrelationships have been appropriately addressed within the Landscape and Visual section, which collectively</p>

Reference	IP submission	Applicants' response
		consider the effects on openness and landscape character from a design and visual perspective.
REP5-174 174.16	2.15 Ref 4.5: Needs to apply to the whole length of the development, not just the Substation sites.	The Applicants note LCC's observation and confirm that it is addressed within the updated oDP (J3/F03) submitted at Deadline 6.
REP5-174 174.17	2.16 The 'Peoples' aspect of the Strategic Design Principles is very weak, it demonstrates little to that has been proposed to allay the concerns that the public has and that LCC Landscape have tried to address in Landscape Proposals on and off site. 2.17 The 'Places' aspect of the Strategic Design Principles is also very weak. It offers very little assurance of how and where the landscape character is being integrated and mitigated.	The Applicants refer to their response to ExQ2 Q2:13.1.5c above.
REP5-174 174.18	2.18 Ref 4.6: This speaks in the future tense as to what is beginning to happen, not what has fully happened now. There is real and genuine concern that the Landscape Proposals do not reflect sufficient updates and do not achieve mitigation as suggested and recommended and that if the Landscape Proposals Drawings as they stand become part of the Design Code that these get carried through to Post Consent.	The Applicants note LCC's concerns regarding the future-oriented phrasing in the oDP (J3/F03) and the potential implications for the landscape strategy and Design Codes in due course. The oDP (J3/F03), certified under Requirement 4 of the draft DCO (C1/F09), establishes the governance framework for design development post-consent, providing a structured process to ensure that landscape strategies are developed in accordance with the Project Level Design Principles set out within the oDP.
REP5-174 174.19	2.19 Ref 4.6.3.5: 'may be' offers no degree of certainty or assurances. LCC noted at meeting of 15.09.25 that document offers conflicting information. On one hand stating that material to be steel with cladding, another stating the design partner would look at options. Confusing and doesn't offer assurance that would achieve a mutually agreed outcome.	The Applicants confirm that the landscape strategies are <i>indicative</i> at this stage and that further detailed design work, including mitigation measures, will be progressed in consultation with the relevant planning authority, post-consent. This approach ensures that final proposals are informed by up-to-date site conditions and stakeholder input (as determined by FBC), rather than being fixed at this stage of the Projects. Regarding material specification and design options, the Applicants acknowledge that some elements are currently expressed as <i>indicative</i> to allow flexibility during detailed design. The oDP and associated governance arrangements ensure that the final detailed design will be agreed with the relevant authorities, providing certainty that materials, finishes, and design outcomes will achieve a mutually agreed solution. The use of flexible wording such as "may be" reflects the intention to enable iterative design development while maintaining compliance with the overarching principles secured through

Reference	IP submission	Applicants' response
		<p>the Design Code and the Project Level Design Principles (Sections 5 and 6 of the oDP).</p> <p>On this basis, the Applicants consider that the oDP, in combination with the draft DCO Requirements, provides a clear and enforceable framework to secure the development of the landscape strategies and substation design post-consent. This framework ensures that mitigation and design outcomes will be agreed with the relevant planning authorities, providing certainty and compliance with policy objectives while allowing necessary flexibility for detailed design.</p>
<p>REP5-174 174.20</p>	<p>Project Level Design Principles: People</p> <p>2.20 There will be cumulative effects no matter what efforts are in place, resulting from the location of two substations in such close proximity. Efforts in mitigation should aim to minimise the cumulative effects by utilising recommendations as put forward by LCC & FBC Landscape Architects.</p> <p>2.21 PE2: Delivery: This should also include off site planting to mitigate, filter and reduce effects for residents, PROW users and Business users.</p> <p>2.22 PE3: Do not have confidence that 'Big' decisions/ Key drivers would be agreed post consent.</p>	<p><u>Potential cumulative effects and mitigation measures</u></p> <p>The Applicants acknowledge LCC's concern regarding potential cumulative effects arising from the proximity of the two substations.</p> <p>As noted in the Applicants' previous submission, these effects have been assessed within the ES, with mitigation measures are secured through the certified documents of the oLMP (J2/F05) and oDP (J3/F03) amongst the other submitted management plans, which will become certified as part of the DCO consent award.</p> <p><u>Off-site planting</u></p> <p>The Applicants recognise that LCC's proposals for off-site planting reflects their objective to protect the visual amenity of residents and business beyond the Transmission Assets' Order Limits.</p> <p>However, as with all planning applications (whether NSIPs or otherwise), it is not within the Applicants' ability or remit to promote or secure planting or mitigation measures beyond the defined Order Limits. The scope of the EIA and the parameters secured through the draft DCO are legally and procedurally confined to land within the Order Limits. Off-site works would fall outside this statutory framework and require separate agreements or consents from landowners and the local planning authority. This approach is typical of, and consistent with, established practice for NSIPs, where mitigation is designed and secured within the Order Limits to ensure deliverability, enforceability, and compliance with the Rochdale Envelope.</p> <p><u>Confidence in decision-making process</u></p>

Reference	IP submission	Applicants' response
		With respect to confidence in decision-making, the Applicants emphasise that key design drivers are secured through the oDP and Requirement 4 of the draft DCO (C1/F09), providing a robust and enforceable framework for the detailed design process post-consent.
REP5-174 174.21	<p>Places</p> <p>2.23 PL1: Needs to include ponds, they are an intrinsic part of the landscape character.</p> <p>2.24 PL3.1: Needs to include off site planting- strengthens character- boundaries and reduces effects of urban built form/ scale in rural area; Fencing as its stands would not contribute to screening, it adds to urban and alien elements in the rural area.</p> <p>2.25 PL3.2: The level changes inside the site do not necessarily need to be gentle etc. if they are internal and not seen. There is an opportunity to retain earth internally to enable greater level changes and therefore greater screening. There would be opportunities to use fill elsewhere in the local area to control views, control levels near watercourses.</p> <p>2.26 PL1-5.3: these need to be agreed specifically with consenting Authorities (Delivery). Not just 'discussions'.</p>	<p>The Applicants note the request for ponds to be incorporated as part of the design.</p> <p>The incorporation of water features, where appropriate, will be considered through the detailed design process, guided by the oLMP, outline Wildlife Hazard Management Plan (oWHMP, S_D3_8/F03) and in consultation with the discharging authority.</p> <p>The role of planting to strengthen landscape character and reduce the perceived scale of built form is also recognised, and this principle is embedded in the updated oDP and oLMP submitted at Deadline 6.</p> <p>The Applicants note the points regarding landform and level changes; these matters will be explored in the detailed design process to ensure appropriate screening and integration with the surrounding landscape. Engagement with FBC, as the discharging local authority, will continue to ensure agreement is reached where required.</p>
REP5-174 174.22	<p>Value</p> <p>2.27 Ref 4.6.3.6: Disagree that The Landscape Strategy (Proposals) to date reflects discussions with consenting Authorities. They do not demonstrate any 'evolvment' as have not changed in 6 months.</p>	<p>The Applicants do not agree that the indicative landscape strategy has failed to evolve during the Examination.</p> <p>Iterative refinements have been made to the oDP (J3/F03) at Deadline 5 and Deadline 6, in response to feedback from relevant stakeholders. The oLMP has been, correspondingly, updated and submitted at Deadline 6, incorporating necessary updates to reflect revisions to the oDP.</p>
REP5-174 174.23	<p>2.28 Ref 5.1.1.12: This demonstrates that there have been no further changes to either Substation sites within a 6 month period, despite the numerous discussions, suggestions and recommendations from consenting authorities.</p>	<p>These documents reflect the outcome of ongoing discussions and provide the certified framework for post-consent design development, ensuring the continued incorporation of stakeholder input.</p>
REP5-174 174.24	<p>2.29 Ref 5.2 generally: Disagree based on LCC Landscape comments to Green Belt Technical Note.</p>	<p>The Applicants acknowledge LCC's disagreement and notes that their comments have not been published in the Examination, having been shared only in confidence (prior to Deadline 6) with the Applicants and their appointed consultants.</p>

Reference	IP submission	Applicants' response
REP5-174 174.25	2.30 Ref 5.3.1.2-4: Disagreed. The site layout maybe well designed, but its integration is not. The examples illustrated documented images with different scales of landscape and different patterns, therefore this is not considered an honest statement and portrays the Applicants objective only.	<p>The Applicants note LCC's comment and confirm that this section was revised for the Deadline 5 and 6 submissions.</p> <p>The Applicants clarify that the purpose of this section is not to demonstrate how a substation would be integrated into its surroundings specifically, but to present precedent images for illustrative purposes. These images are intended to provide information on typical substation design and how such design can be developed. They are not intended to mislead or misrepresent the landscape context.</p>
REP5-174 174.26	2.31 Ref 5.3.3.6: Once developed the Green Belt area of the Substations would become Grey Belt and be open to further development. It would not be reinstated to its original condition as agricultural land use unless stipulated within requirements on decommissioning?	<p>The Applicants refer to their response to the same point LCC made in their Deadline 4 submission (see REP5-122), again refuting the suggestion that the presence of the substation would result in the existing area of Green Belt being regarded as "Grey Belt" or brownfield land.</p> <p>Any future development within this area would continue to require planning consent from the local planning authority, and this controlling mechanism would therefore remain in place for any potential development proposals in the future.</p>
REP5-174 174.27	2.32 Indicative Substation layout doesn't present an actual layout per specific site area. Applicant explained this is being developed, possibly post consent? It is unknown. Greater clarity required.	<p>The Applicants note the comment. The layouts provided are indicative and demonstrate the design approach rather than a fixed arrangement for each site. The Applicants remind LCC that the DCO application is parameter-based and as stated repeatedly throughout the Examination, detailed layouts will be developed post-consent under the governance framework of the oDP (J3/F03) and secured through Requirement 4 of the draft DCO (C1/F09).</p> <p>This ensures layouts are informed by site-specific conditions, stakeholder input, and the discharging authority's guidance while remaining consistent with certified design principles and codes.</p>
REP5-174 174.28	2.33 Ref 4.3.4.6: needs also to include maximum noise abatement for PRoW & Bridleway.	The Applicants note LCC's observation. The detailed design of the substation and the mitigation of noise will be addressed through the post-consent design process, in accordance with relevant management plans and in consultation with FBC, consistent with the governance arrangements set out in Section 6 of the oDP (J3/F03).
REP5-174 174.29	2.34 Ref 5.3.5.4: use of 'May be' offers no assurance that this would happen.	The Applicants refer to their response at 174.19 above.

Reference	IP submission	Applicants' response
REP5-174 174.30	2.35 Topographic information needs to be such as to be legible. It isn't at present. The information provided for cross -sections has not been updated (as from viewing 15.09.25), following comments by the Examiner at Hearing 2 and previous LCC Landscape comments. The Applicant acknowledged this, but it wasn't clear whether updates were to be proposed.	<p>The Applicants refer to their submission of The Applicants' response to <i>Hearing Action Points due at Deadline 5 - Rev F01</i> (REP5-138) in which the Applicants prepared and submitted revised cross-sections for examination, which are appended to this document (see Appendix A to this document). These are also incorporated into the interim update of the outline Design Principles (J3/F03).</p> <p>The Applicants refer to their D5 submission of <i>The Applicants' Response to Hearing Action Points</i> (REP5-138, F01), in which revised cross-sections were prepared for the Examination and appended to the document (see Appendix A). Additionally, represented topographic, in light of ISH3 discussions, were also incorporated into the interim update of the oDP (J3/F03).</p>
REP5-174 174.31	2.36 Ref 5.3.9.1: Contradictions make for confusion. At one point it is stated that a design partner would utilise vernacular materials which integrate with the landscape. This totally contradicts and states Substations etc. materials would be selected by function (and in reality probably cost). These would be unlikely to be integrated within the landscape and its rural characteristics.	The Applicants note LCC's observation and confirm that it is addressed within the updated oDP (J3/F03) submitted at Deadline 6.
REP5-174 174.32	2.37 Ref 5.3.11: Palisade fencing is inappropriate in the rural area. It is cheap and urban in appearance. Efforts to fully screen or utilise other fence type options should be explored.	The Applicants note LCC's observation and confirm that it is addressed, notably within the Design Codes set out in Section 6, within the updated oDP (J3/F03) submitted at Deadline 6.
REP5-174 174.33	2.38 Ref 5.3.13: Disagreement over widths of permanent accesses and justification for such widths not yet provided.	The Applicants acknowledge LCC's disagreement regarding the width of permanent access. The temporary construction access width of 20m will be reduced to a 15m permanent access following completion of works. This permanent width is required to safely accommodate for abnormal indivisible loads (AIL) and heavy goods vehicles deliveries to the onshore substations to facilitate maintenance and repairs. During normal operation, the access will typically be used only by cars and light goods vehicles for routine maintenance visits.
REP5-174 174.34	2.39 Ref 5.3.14: Mitigation Planting?	The Applicants note LCC's suggestion.
REP5-174	2.40 Ref 5.3.14.3 Arable???	The Applicants note LCC's observation and confirm that this term has been corrected in the updated oDP (J3/F03) submitted at Deadline 6.

Reference	IP submission	Applicants' response
174.35		
REP5-174 174.36	<p>2.41 Ref 5.3.14.5 Realistically it is not woodland but Native Tree Structure Planting. Woodland is misleading, suggesting something much larger than it actually is. Define 'sympathetically'.</p> <p>There are limitations of this, be honest with descriptions. To the west of the Morgan Substation little space exists, to the east the levels fall , therefore reducing capacity to screen, cables enter/ exit the Substation areas preventing tree planting.</p>	<p>The Applicants note LCC's comments but request clarification as to why the Applicants' proposals for woodland, as set out historically in the oDP and oLMP, differ from LCC's request for "<i>...small woodland blocks built into the shape and layout of the field pattern, which help screen important viewpoints, but appear more natural than a line of planting which emphasises the built development...</i>" as set out in their response to ExQ2 13.1.5c (see above).</p> <p>As stated in Section 5 of each version of the oDP (i.e. F01 and F02), planting will be appropriate to the local landscape character and is intended to enhance the green infrastructure network, as identified in the oLMP and the oEMP. Planting is designed to screen and filter views of the substations from surrounding landscape and visual receptors and to integrate the substations into their landscape context.</p> <p>The Applicants therefore refer LCC to the updated oDP (J3/F03) and oLMP (J2/F05) submitted at Deadline 6, which incorporates, where practicable at this stage of the Project, revisions in light of LCC's and other stakeholders' feedback during the Examination.</p>
REP5-174 174.37	2.42 Ref 5.3.14.10: Permeable/ impermeable...confusing description.	The Applicants note LCC's observation and confirm that this term has been corrected in the updated oDP (J3/F03) submitted at Deadline 6.
REP5-174 174.38	2.43 Ref 5.3.14.11-12: Doesn't say how, when, why, almost pointless, words no substance. Figures 12 and 13 need to be updated and would not be accepted in their current state.	The Applicants note LCC's commentary and refer to the enforceable framework that will be established as part of the post-consent governance of the Project. This framework will enable FBC, as the discharging authority, to guide and influence the evolution of the detailed (and final) design of the Transmission Assets.
REP5-174 174.39	2.44 Might be useful to include the Commitments as an Appendix for ease of reference.	The Applicants note that the updated interim version of the oDP (J3/F03), submitted at Deadline 5, revised the section regarding Commitments by simplifying its inclusion within the oDP and instead referring to the full list contained in Volume 1, Annex 5.3: Commitments Register (document reference F1.5.3).
REP5-174 174.40	2.45 Unless the 'Design Champion' is independent there is little faith that design would fulfil considerations from planning authorities or stakeholders. See also comments to ExQ2.	The Applicants are disappointed to note LCC's lack of confidence in the professionalism and integrity of the appointed Design Champions.

Reference	IP submission	Applicants' response
		<p>The Design Champion is appointed to ensure the Project's design vision is maintained throughout its lifecycle, providing oversight, guidance, and accountability to promote high-quality design. Their responsibilities include defending the design vision, translating design value for the board, evaluating design quality, fostering a culture of design excellence, providing high-level advice, ensuring holistic decision-making, and monitoring implementation.</p> <p>In combination with other post consent mechanisms outlined in the oDP (see section 6), this role provides assurance that the design principles embedded within the oDP will be upheld throughout the Project's lifecycle.</p>
REP5-174 174.41	2.46 Ref 6.2.1: This section assumes that Concept / Design Layout is approved, it isn't. The Landscape Proposals Plans should be approved prior to Detail Design. (Jumping to Stage E LI (Landscape Institute) Stages when only at Stage C/D).The Design stage is not yet up to Detail Design.	<p>The Applicants note LCC's comment and refer them to the <i>Pre-Submission Engagement with Local Planning Authority</i> part of Section 6, which sets out the structured process proposed for design review.</p> <p>This proposed process outlines how the Applicants, together with their appointed technical design partner and project team, will engage with the discharging authority to undertake the following tasks:</p> <ul style="list-style-type: none"> • Review proposed layouts and building/structure configurations. • Discuss the level of design detail required to support the discharge of requirements, including landscaping, access, security, drainage, biodiversity, and lighting measures. • Agree the coordination of submission materials, consultation requirements, and reporting protocols. • Outline the approach to design review and agree on processes for stakeholder involvement.
REP5-174 174.42	2.47 Ref 6.2.1.7: To this should be added ; Built form, Layout of Built form, Landscape Proposals , inclusive of hard and soft materials, proposed levels and contours, off site planting, PRoW & Bridleway relocation design;	The Applicants note LCC's request, referring them to Sections 6.2 and 6.3 of the updated oDP (J3/F03) submitted at Deadline 6, which sets out how early engagement will commence with discharging authority, establishing the context for subsequent design development.
REP5-174 174.43	2.48 Ref 6.6.2.3: Figure 15 Indicative Approach to Post Consent Design Evolution not included, therefore cannot comment at this stage.	The Applicants note LCC's observation and confirm that it is addressed within the updated oDP (J3/F03) submitted at Deadline 6.

Reference	IP submission	Applicants' response
REP5-174 174.44	2.49 Ref 6.2.2.4-6: These two processes would be better run in tandem, not separately.	The Applicants note LCC's comment and refer them to the <i>Design Review Process</i> part of Section 6, which sets out the structured process proposed for design review. This proposed process outlines how the Applicants, together with their appointed technical design partner and project team, will engage with the discharging authority to establish the context for subsequent detailed design development.
REP5-174 174.45	2.50 Design Codes: General: The Design Codes should apply to the whole length of the Proposed Development, not just the Substation Areas;	The Applicants note LCC's observation and confirm that it is addressed within the updated oDP (J3/F03) submitted at Deadline 6.
REP5-174 174.46	2.51 Ref DC1: Cost Effective and Efficient denotes primary concern is Applicant requirements and not what is needed to fulfil requirements to landscape and visual elements and what is necessary to integrate the Substation Developments into the rural and agricultural landscape. Needs to add: and further Mitigation Measures to be agreed with stakeholders and planning authorities.	The Applicants note LCC's observation and confirm that it is addressed within the updated oDP (J3/F03) submitted at Deadline 6.
REP5-174 174.47	2.52 Ref DC3: This should not just refer to Detail Design, but should also include agreeing the Landscape Strategy /Landscape Proposals Drawings (The Landscape Institute Stages of Work ...Detail Design is Stage E. Landscape Proposals are currently at Stages C/D and need further refinement.	The Applicants note LCC's observation and confirm that it is addressed within the updated oDP (J3/F03) submitted at Deadline 6.
REP5-174 174.48	2.53 Ref DC4: How?	The Applicants refer to the updated oDP (J3/F03) submitted at Deadline 6 – see Section 6.
REP5-174 174.49	2.54 Ref DC7: Include for liaising with relevant stakeholders.	
REP5-174 174.50	2.55 Ref DC8: Include Off-Site planting as discussed at pre consent to reduce visual effects	The Applicants refer to their response to ExQ2 Q2:13.1.5c above.