



MORGAN AND MORECAMBE OFFSHORE WIND FARMS: TRANSMISSION ASSETS

Applicants' Response to Deadline 5 submissions from Statutory Consultees and other organisations

Deadline 6
Application Reference: EN020028

Document Numbers:
MRCNS-J3303-JVW-19235
MOR001-FLO-CON-ENV-NOT-0084

Document Reference: S_D6_2
F01

22 October 2025

Document status					
Version	Purpose of document	Approved by	Date	Approved by	Date
F01	Deadline 6	GL	October 2025	IM	October 2025

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Glossary

Term	Meaning
Applicants	Morgan Offshore Wind Limited (Morgan OWL) and Morecambe Offshore Windfarm Ltd (Morecambe OWL).
Candidate Special Areas of Conservation	Areas that were submitted to the European Commission as candidates for designation as a Special Area of Conservation before the end of the Transition Period following the UK's exit from the EU, but not yet formally designated. See also Special Areas of Conservation.
Development Consent Order	An order made under the Planning Act 2008, as amended, granting development consent.
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.
Environmental Statement	The document presenting the results of the Environmental Impact Assessment process.
European Protected Species	Species (such as bats, great crested newts, otters and dormice) which receive full protection under The Conservation of Species and Habitats Regulations 2017 and Conservation of Offshore Marine Habitats and Species Regulations 2017.
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.
Greenhouse gas	A gas that absorbs and emits radiant energy within the thermal infrared range, causing the greenhouse effect. Examples include carbon dioxide and methane.
Habitats Regulations	The Conservation of Habitats and Species Regulations 2017 (as amended) and the Conservation of Offshore Marine Habitats and Species Regulations 2017 (as amended).
Kyoto Protocol	The Kyoto Protocol is an international agreement linked to the United Nations Framework Convention on Climate Change, which commits its parties to reducing greenhouse gas emissions by setting internationally binding emission reduction targets, implemented primarily through national measures but also via wider market-based mechanism.
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 Planning Authority	The local government body (e.g., Borough Council, District Council, etc.) responsible for determining planning applications within a specific area.

Term	Meaning
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.
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 OWL	Morgan Offshore Wind Limited is a joint venture between JERA Nex bp (JNbp) and Energie Baden-Württemberg AG (EnBW).
National Policy Statement(s)	The current national policy statements published by the Department for Energy Security and Net Zero in 2023.
Planning Inspectorate	The agency responsible for operating the planning process for applications for development consent under the Planning Act 2008.
Protected species	A species of animal or plant which it is forbidden by law to harm or destroy.
Ramsar sites	Wetlands of international importance that have been designated under the criteria of the Ramsar Convention. In combination with Special Protection Areas and Special Areas of Conservation, these sites contribute to the national site network.
Renewable energy	Energy from a source that is not depleted when used, such as wind or solar power.
Special Areas of Conservation	A site designation specified in the Conservation of Habitats and Species Regulations 2017. Each site is designated for one or more of the habitats and species listed in the Regulations. The legislation requires a management plan to be prepared and implemented for each SAC to ensure the favourable conservation status of the habitats or species for which it was designated. In combination with Special Protection Areas and Ramsar sites, these sites contribute to the national site network.
Special Protection Areas	A site designation specified in the Conservation of Habitats and Species Regulations 2017, classified for rare and vulnerable birds, and for regularly occurring migratory species. Special Protection Areas contribute to the national site network.
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).

1 Applicants' response to Written Representations

1.1 Introduction

- 1.1.1.1 Following Deadline 5, Morgan Offshore Wind Limited and Morecambe Offshore Windfarm Limited (hereafter, 'the Applicants') have taken the opportunity to review each of the submissions from Statutory Consultees and other organisations.
- 1.1.1.2 Details of the Applicants' response to each of the submissions from Statutory Consultees and other organisations 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.
- 1.1.1.4 This document is accompanied by the following annexes:
- Annex 2.1 to Applicants' Response to Deadline 5 submissions from Statutory Consultees and other organisation: BAE Systems (REP5-159);
 - Annex 2.2 to Applicants' Response to Deadline 5 submissions from Statutory Consultees and other organisation: Blackpool Borough Council (REP5-164);
 - Annex 2.3 to Applicants' Response to Deadline 5 submissions from Statutory Consultees and other organisation: Fylde Borough Council (REP5-170, REP5-171, AS-084);
 - Annex 2.4 to Applicants' Response to Deadline 5 submissions from Statutory Consultees and other organisation: Lancashire County Council (REP5-174);
 - Annex 2.5 to Applicants' Response to Deadline 5 submissions from Statutory Consultees and other organisation: Marine Management Organisation (REP5-175); and
 - Annex 2.6 to Applicants' Response to Deadline 5 submissions from Statutory Consultees and other organisation: Natural England (REP5-177-184).

1.2 NHS Lancashire and South Cumbria Integrated Care Board

Table 1.1: AS-085 – NHS Lancashire and South Cumbria Integrated Car Board (Response to Procedural Decision)

Reference	IP submission	Applicants' response
AS-085 085.1	<p>Dear Morgan and Morecambe OWFTA Case Team,</p> <p>Thank you for your notification regarding the Examining Authority's procedural decision in response to the applicants' request to amend the application and vary the examination timetable for the Morgan and Morecambe Offshore Wind Farms Transmission Assets Project.</p> <p>As an Interested Party (Ref: MMTA-SP003), L&SC ICB acknowledge receipt of the decision letter and confirm that we have reviewed the published documentation available on the National Infrastructure Planning website.</p> <p>We would appreciate clarification on the following points:</p>	The Applicants note this response.
AS-085 085.2	<ul style="list-style-type: none"> • The nature and scope of the proposed changes to the application. 	<p>The Applicants have continued to refine the proposals through detailed design and engagement with stakeholders. Through these discussions, opportunities to make changes which respond to requests from statutory consultees and other interested parties have been identified.</p> <p>A summary of the changes resulting from the Change Request is set out in Section 2 of the Change Request Consultation Report (REP5-154). A full explanation of the proposed changes alongside mapping extracts can be found in the Change Request Report (CR1- 005).</p>
AS-085 085.3	<ul style="list-style-type: none"> • Any implications these changes may have on the examination process and on stakeholders in the Northwest region, particularly in relation to NHS infrastructure. 	The Applicants made the change request at the earliest opportunity following continued engagement with key stakeholders and landowners. Given the proposed changes do not engage the Compulsory Acquisition Regulations 2010 and do not require submission of supplementary environmental information pursuant to the EIA Regulations, this ensured sufficient time remained to accommodate the change request within the existing Examination timetable. As

Reference	IP submission	Applicants' response
		<p>such, no changes have been made to the examination timetable as a result of the change request.</p> <p>The Applicants note these changes do not have implications on stakeholders in the northwest or to NHS infrastructure.</p>
AS-085 085.4	<ul style="list-style-type: none"> How will the scheme impact on staff/patients attending work/appointments. 	<p>The Applicants confirm access for patients and staff will not be impacted by the change request. The changes are refinements and reductions to the application proposals identified through early detailed design work and ongoing engagement with relevant stakeholders. The changes are not considered to be substantive, nor do they result in a materially different application.</p> <p>Volume 3, Chapter 7: Traffic and Transport of the Environmental Statement (APP-108) contains an assessment of the potential impacts from the Transmission Assets on traffic and transport receptors, including the potential impacts of increased vehicle movements (i.e. Heavy Goods Vehicles (HGVs) and staff movements) and potential impacts resulting in congestion.</p> <p>The assessment has considered the potential impacts of the Transmission Assets in relation to driver delay, severance, non-motorised user delay, fear and intimidation, road safety and abnormal loads. This includes the consideration of maintenance of access for emergency vehicles and residential access. The assessment concludes (with the application of mitigation measures) that the residual effects would not be significant in Environmental Impact Assessment (EIA) terms.</p>
AS-085 085.5	<ul style="list-style-type: none"> How the works will mitigate any issues to emergency services e.g. ambulances access to NHS sites and response times. 	<p>To manage the potential impacts of construction of the Transmission Assets, the Applicants will apply the measures described in the Outline Code of Construction Practice (OCoCP) (REP5-044) and the associated management plans. The CoCP(s) are secured by Requirement 8 of Schedules 2A and 2B of the draft DCO (REP5-010). Detailed CoCP(s) will be implemented as approved by the relevant local planning authorities in consultation with the relevant statutory stakeholders, as appropriate.</p> <p>The Applicants note that significant commitments have been made to the use of trenchless installation techniques, such as Horizontal Directional Drilling (HDD) to minimise disruption to all A, B and Classified roads (with the exception of</p>

Reference	IP submission	Applicants' response
		<p>Leach Lane), preventing the need for any full road closures (see CoT02, Volume 1, Annex 5.3: Commitments Register (REP5-027)). This commitment to the use of trenchless techniques is secured via Requirement 8 (Code of Construction Practice) of Schedules 2A and 2B of the draft DCO (REP5-010).</p> <p>With regard to Leach Lane the Applicants have committed to maintaining access, with works completed on a 'half / half basis' with traffic to be controlled through the use of temporary traffic management, such as traffic signals. The open cut trenching on Leach Lane is not expected to result in any road closures and access will be maintained at all times including for emergency services and for buses.</p> <p>An Outline Construction Traffic Management Plan (oCTMP) has been prepared and submitted with the application for development consent (REP5-066). The requirement to produce the detailed CTMP(s) in accordance with the OCTMP in consultation with, and for approval by, the relevant highway authority, is secured by Schedules 2A and 2B of Requirement 9 of the draft DCO (REP5-010).</p>
AS-085 085.6	<ul style="list-style-type: none"> • What is the length of the development programme e.g. disruption over how many years. 	<p>There are no changes to the construction periods as a result of the change application.</p> <p>The Applicants have previously provided a technical note on construction scenarios, submitted in response to a request from the ExA within the Rule 9 letter (AS-070). Section 1.5 of the ES assessment of Construction Scenarios outlines the overarching construction scenarios considered for the Transmission Assets and includes specifics on the potential construction durations.</p> <p>The maximum indicative construction duration is up to 66 months for sequential construction although work will not be carried out across the whole order limits during this period. AS-070 also explains that in any sequential construction scenario, irrespective of any gap between the first offshore windfarm assets completing construction and the second offshore wind farm transmission assets commencing construction, the total combined construction period would be for</p>

Reference	IP submission	Applicants' response
		an overall period of up to 66 months (again not across the whole order limits for this period).
AS-085 085.7	<ul style="list-style-type: none"> How close is the works to any NHS site. 	<p>The Applicants note that no NHS hospitals fall within the onshore order limits of the Transmission Assets.</p> <p>The approximate distances between the order limits of the Transmission Assets and the nearest hospitals are as follows:</p> <ul style="list-style-type: none"> Buckshaw Hospital – 7.7km Clifton Hospital – 696 m (to the proposed Fairhaven Saltmarsh mitigation area where no construction works will take place) and 2.5km (to the order limits of the onshore infrastructure) Victoria Hospital – 5km Spire Fylde Coast Hospital – 5.5km The Royal Preston Hospital – 5.2km Fulwood Hall Hospital – 6.1km <p>As a result of the distances involved, the proposals will have no direct impact on hospitals or emergency services.</p>
AS-085 085.8	<ul style="list-style-type: none"> Will construction activities impact on clinics e.g. audiology 	<p>Please refer to AS-085 085.7 for more information. As there are no hospitals located within or close to the onshore order limits of the Transmission Assets, the proposals will have no direct impact on hospitals or emergency services.</p>
AS-085 085.9	<p>Although the document states Morecambe , will this also impact the Fylde Coast e.g. Blackpool, St Annes, Lytham, Warton and Freckleton and Penwortham?</p>	<p>The purpose of the Transmission Assets is to connect the Morgan Offshore Wind Project: Generation Assets and Morecambe Offshore Windfarm: Generation Assets to the National Grid in Penwortham.</p> <p>The onshore elements of the Transmission Assets are located within the local authority areas of Fylde Council, Blackpool Council, South Ribble Borough Council, Preston City Council and Lancashire County Council. Please refer to the local plan for the onshore order limits (REP5a-005) for more information.</p>

Reference	IP submission	Applicants' response
AS-085 085.10	Please keep me informed of any further updates or opportunities to provide input during the revised examination timetable.	Interested parties to the examination will automatically receive updates from the Planning Inspectorate regarding the examination of the application. If you would like to sign up for updates, please visit the Planning Inspectorate's website for the Transmission Assets project.

1.3 Canal & River Trust

Table 1.2: REP5-165 – Canal & River Trust (Submission for Deadline 5)

Reference	IP submission	Applicants' response
REP5-165 165.1	We write further to the publication of the Deadline Four (DL4) submissions. We wish to provide the Examiner (ExA) with an update on the Trust's latest position in relation to the examination, with headings to identify the various elements in relation to Deadline Five (DL5), including update on progress made on negotiating an agreement in terms of the rights over Trust leased land. We also provide comments on Deadline 4 matters relevant to the Trust.	The Applicants thank Canal and River Trust (the Trust) for their written submissions and have responded below.
REP5-165 165.2	Rights over Trust leased land The Trust's agents in relation to the land negotiations for rights over our leased land, Carter Jonas, are currently in discussion with Dalcour McClaren in relation to the draft Heads of Terms (HoT). We will update the ExA further as negotiations progress. The Trust expects agreement can be reached before the end of the examination, provided there is sufficient engagement on the HoTs from the applicant.	The Applicants are hopeful the heads of terms for the land rights sought can be agreed in the coming weeks following the negotiation with the Trust's appointed land agent.
REP5-165 165.3	Notification of hearings Further to your letter dated 9th September 2025, notifying of the issue specific hearing 4 (ISH4) and compulsory acquisition hearing 3 (CAH3). The Trust do not intend on attending either of these hearings.	The Applicants note the Trust's response.
REP5-165 165.4	Examiners second written questions (ExA2) The Trust has reviewed the ExA2 and note that there are no questions for the Canal & River Trust or matters relevant to our interests. We therefore have no comments to make.	The Applicants note the Trust's response.
REP5-165 165.5	Trusts' response to Deadline Three matters The Trust has no comments to make on the applicants' other DL4 Submissions. The Trust will update the ExA on the progress made in relation to land negotiations and other matters at each relevant deadline.	The Applicants note the Trust's response.

1.4 Defence Infrastructure Organisation

Table 1.3: REP5-166 – Defence Infrastructure Organisation (Response to ExQ2 and dDCO Q1)

Reference	ExA Question	IP submission	Applicants' response
		<p>This letter is submitted in response to the Examining Authority's written questions and requests for information (ExQ2), and the Examining Authority's commentary and questions on the draft Development Consent Order both of which were issued on 8 September 2025. Responses are provided to those questions marked for the attention of the Ministry of Defence (Defence Infrastructure Organisation) only. The wording of those questions addressed to Ministry of Defence (MOD) have been used to structure this response, neither the text providing the context for each of those questions, or those questions directed at other parties have been replicated.</p> <p>The Defence Infrastructure Organisation (DIO) Safeguarding Team represents the MOD as a consultee in UK planning and energy consenting systems to ensure that development does not compromise or degrade the operation of defence sites such as aerodromes, explosives storage sites, air weapon ranges, technical sites or maritime defence assets and interests.</p>	<p>The Applicants note the submission from the DIO and welcome ongoing engagement in relation to the bird strike concerns raised by BAE Systems in relation to Warton Aerodrome.</p> <p>The Applicants have agreed to submit a joint SoCG to be submitted at Deadline 7. The signed Deadline 7 submission will be comprehensive and result in substantial changes to the current draft (through the inclusion of DIO, the introduction of a policy section and an update to the section on Bird Strike to reflect the DIO's subject matter expert's feedback and the current position in respect of the Wildlife Attractants Habitat Risk Assessment). The SoCG will summarise the engagement to date, the position on bird strike risk and outline the policy positions of all parties.</p>
ExQ2 Q2:4.1.9	<p>Initial objection</p> <p>This was referred to in Q4.1.16. of ExQ1 [PD-008], as the Defence Infrastructure Organisation (DIO)/ Ministry of Defence (MOD) were initially objecting to the application but was reviewing the later</p>	<p>The initial objection raised in MOD's response dated 20 May 2025 on the grounds of insufficient information to be able to allow necessary assessments to be completed for the potential for the development to result in an increased risk of birdstrike and degradation of</p>	<p>The Applicants have carried out an assessment of the potential impacts on Warton Aerodrome through provision of additional information in the documentation developed and submitted through the examination of the Application. This satisfies the need for "any necessary assessment of the proposal on aviation".</p>

Reference	ExA Question	IP submission	Applicants' response
	documentation. Please can there be an update as to their position?	aviation safety remains extent. However, the Applicant, DIO and BAE Systems are fully engaged in discussions about the required documentation to enable a detailed assessment of any risk posed and any mitigation proposed to be completed. The MOD will update the Planning Inspectorate of any revised position as necessary.	<p>The Applicants have demonstrated through the development of the Wildlife Attractants Habitat Risk Assessment (Appendix A of the outline Wildlife Hazard Management Plan (REP5-106)), that the potential increase in probability associated with increased bird numbers or bird patterns of movement as a result of the Transmission Assets does not constitute an unacceptable risk to Warton Aerodrome (or Blackpool Airport).</p> <p>Within the Wildlife Attractants Habitat Risk Assessment mitigation, monitoring and adaptive management have all been committed to, ensuring any effects the Transmission Assets would have on Warton Aerodrome remain acceptable. This has been achieved through:</p> <ul style="list-style-type: none"> the design of the Transmission Assets and the design commitments embedded in the Appendix A Wildlife Attractants Habitat Risk Assessment of the outline Wildlife Hazard Management Plan, illustrating how the requirement to design infrastructure, buildings and other elements from energy installations, as well as environmental mitigation in such a way so as not to increase the bird strike risk; and the measures secured through the requirements including BAE and DIO's roles as named consultee in respect of Requirement 27 (Wildlife Hazard Management Plan). <p>This enables the Secretary of State (and the ExA) to conclude that the impacts of the proposed energy developments do not present risks to national security</p>

Reference	ExA Question	IP submission	Applicants' response
			or physical safety. In the absence of a bespoke Warton Aerodrome bird strike risk assessment the Secretary of State can be satisfied that appropriate mitigation can be achieved, or appropriate requirements can be attached to the DCO to secure those mitigations. Therefore, in accordance with paragraph 5.5.60 of NPS EN-1 consent may be granted.
DCO Q1:3.4	<p>Requirement 4 – Substation works</p> <p>The applicants are of the view that it is not necessary or appropriate for BAE Systems or the DIO to be named as consultees in this requirement (Action point ISH3.22 of REP4- 108J).</p> <p>(a) Does the Council and the DIO agree with the applicants view on this?</p> <p>(b) For planning applications under the Town and Country Planning Act 1990 regime, would the Council be required to consultee BAE Systems or the DIO for similar forms of development that might affect defence interests?</p>	<p>(a) No DIO do not agree with the applicant's view. DIO confirm that they wish to be a consultee as the development occupies statutory safeguarded zones.</p> <p>(b) Should a development such as a substation occupy one of the safeguarding zones surrounding BAE Warton Aerodrome and trigger the consultation criteria as set out on the statutory safeguarding plan dated 2015, Fylde Borough Council are required to consult DIO in accordance with the provisions of the Town and Country Planning (Safeguarded aerodromes, technical sites and military explosives storage area) Direction 2002.</p>	<p>The Applicants have updated Requirement 4 and Requirement 5 in Schedules 2A and 2B at Deadline 6 to incorporate the drafting requested by BAE Systems and the DIO, namely that BAE and the Ministry of Defence would be consulted on the location and heights of lightning rods and (if required) the positioning of any aircraft hazard warning lights affixed thereto. The Applicants would note there is no need to add the word 'local' into the defined term 'relevant planning authority' as this is set out in the definition of this term at article 2 of the draft DCO.</p> <p>The Applicants have also updated the outline CoCP at Deadline 6 (J1/F05) to include the commitment to notifying the Civil Aviation Authority and Warton Aerodrome before the installation of the lightning protection rods at the onshore substation(s).</p>
		I trust this adequately explains the MOD/DIO position in response to relevant questions within the Examining Authority's written questions 2 issued 8 September 2025 and the Examining Authority's commentary and questions on the draft Development Consent Order also issued 8 September 2025.	The Applicants note the MoD / DIO position in response to relevant questions and will reflect the project made in the joint SoCG to be submitted at Deadline 7.

1.5 Environment Agency

Table 1.4: REP5-168 – Environment Agency (Comments on Submissions Received by Deadline 4)

Reference	Issue Ref RR-0677/REP4-132	Topic	Environment Agency Position at Deadline 5	Applicants' response
Environment Agency position Our position at Deadline 5 regarding the points raised in our Relevant Representation [RR-0677] and Written Representation [REP1-076], and responding to the Applicant's response provided at Deadline 3 [REP3-052], is set out below.				
REP5-168 168.1	RR-0677.3 REP4-132.19	Flood Risk EA requests early involvement in detailed project design	<i>This matter can be closed.</i> We have reviewed an amended FRA, V04. We are satisfied we have no further flood risk critical comments to make. There are some minor clerical errors that should be corrected for accuracy. These are not material to the assessment of flood risk. We do not need to review the documents again once these errors have been corrected.	The Applicants note this response and welcome the EA's agreement. The Applicants have addressed the minor errors the updated Flood Risk Assessment has been submitted at Deadline 6 (F3.2.3/F03).
REP5-168 168.2	RR-0677.4 REP4-132.20	Geology Hydrogeological Risk Assessment required.	<i>This part of the matter can be closed:</i> We note the amendments to Requirement 8 para (20) (o) and in [REP4- 027] oCoCP para 1.8.2.22. <i>This part of the matter is on-going:</i> We have agreed a strategy to ensure the Outline HyRA covers our concerns. We look forward to reviewing the final version of the Outline HyRA to be submitted at D5.	The Applicants note this response and welcome the EA's agreement. The Outline Hydrogeological Risk Assessment was updated at Deadline 5 (REP5-104) to address the EA's comments. The Applicants have updated the Outline Hydrogeological Risk Assessment at Deadline 6 to respond to the EA's further comments (F3.2.3/F03).
REP5-168 168.3	RR-0677.4 REP4-132.21	Foundation Works Risk Assessment required.	<i>This matter can be closed.</i>	The Applicants note this response and welcome the EAs agreement.

Reference	Issue Ref RR-0677/REP4-132	Topic	Environment Agency Position at Deadline 5	Applicants' response
			We note the inclusion of the wording 'or deep foundation works..' in CoT103 and [REP4-027] oCoCP para 1.8.2.17.	
REP5-168 168.4	RR-0677.7 REP4-132.23	Protective Provisions	<i>This matter is on-going.</i> There are two comments that remain to be resolved. The outstanding points relate to cessation of works where this may cause damage; and the Applicants' ability to review plans of any Agency works which may cause damage to the cables. We are in on-going discussion and expect to close out these points in advance of Deadline 6.	The Applicants and the EA agreed the protective provisions on 15 October 2025. These are included in the draft DCO at Deadline 6 (C1/F09).

Table 1.5: REP5-168 – Environment Agency (Annex A: Comments regarding Flood Risk Assessment)

Reference	IP submission	Applicants' response
REP5-168 168.5	<p>Comments regarding: FLOOD RISK ASSESSMENT REV.04 [REP4-021] [REP4-023], [REP4- 025]</p> <p>We have reviewed the following documents:</p> <ul style="list-style-type: none"> • The Applicants response to the Environment Agency's comments received 04 June 2025 on the Volume 3, Annex 2.3: Flood risk assessment - part 1 of 3 Version F03 May 2025 (REP1-025) • Environmental Statement Volume 3, Annex 2.3: Flood risk assessment - F04 (Parts 1-3) [REP4-021] [REP4-023], [REP4-025] 	The Applicants welcome the Environment Agency's agreement that their previous comments have been satisfactorily addressed. Responses to additional comments have been provided below and an updated FRA (F3.2.3/F03) has been submitted at Deadline 6.

Reference	IP submission	Applicants' response
	<p>We are satisfied that our previous comments (our ref. XA/2025/100400/01-L01 dated 04 July 2025) have been incorporated in the revised documents. We have no further flood risk critical comments to make.</p> <p>However, we have identified some minor clerical errors that should be addressed for accuracy. None of these are material to the assessment of understanding of flood risk. We do not need to review the documents again once these clerical errors have been addressed.</p>	
REP5-168 168.6	<p>Volume 3, Annex 2.3: Flood risk assessment - part 1 Page 87-93, Figures</p> <p>Issue: There don't appear to be any figure reference titles to the Figures on these pages only drawing titles.</p> <p>Impact: It is unclear if this is intentional but could lead to problems referencing.</p> <p>Solution: Add figure reference numbers.</p>	<p>The Applicants note this comment and confirm that the figure reference titles did not appear on the tracked version only– i.e the reference titles were provided on the clean version and therefore, no changes were required. The Applicants have ensured all figures have an associated figure reference. An updated version of Volume 3, Annex 2.3: Flood risk assessment (F3.2.3/F03) has been submitted at Deadline 6.</p>
REP5-168 168.7	<p>Volume 3, Annex 2.3: Flood risk assessment - part 2 Flood defences, 1.6.2.4, Page 131</p> <p>Issue: The Environment has been changed to 'Environmental' Agency Spatial Flood Defences.</p> <p>Impact: No impact, but no reason why it should have been changed.</p> <p>Solution: Change 'Environmental' back to Environment Agency.</p>	<p>The Applicants note this comment and have updated paragraph 1.6.2.4 of Volume 3, Annex 2.3: Flood risk assessment (F3.2.3/F03) accordingly. This has been submitted at Deadline 6.</p>
REP5-168 168.8	<p>Volume 3, Annex 2.3: Flood risk assessment - part 2 Page 162</p> <p>Issue: The drawing does not have a figure title.</p> <p>Impact: Seem like an oversight to not have a figure title.</p> <p>Solution: Include drawing title.</p>	<p>The Applicants note this comment and have ensured all figures have an associated figure reference. An updated version of volume 3, Annex 2.3: Flood risk assessment (F3.2.3/F03) has been submitted at Deadline 6.</p>
REP5-168	<p>Volume 3, Annex 2.3: Flood risk assessment - part 2</p>	<p>The Applicants note this comment and confirm that the discrepancy only appeared on the tracked version and therefore, no changes were required. The</p>

Reference	IP submission	Applicants' response
168.9	<p>Pages 163- 166</p> <p>Issue: Changing in titles and figure numbers appears to have resulted in a discrepancy between the new figure label in the report and the figure reference in the original title box of the drawing.</p> <p>Impact: This makes references somewhat problematic and confusing.</p> <p>Solution: Clerical error requiring correction</p>	<p>Applicants have ensured that all figure references and numbers are consistent. An updated version of volume 3, Annex 2.3: Flood risk assessment (F3.2.3/F03) has been submitted at Deadline 6.</p>
REP5-168 168.10	<p>Volume 3, Annex 2.3: Flood risk assessment part 3</p> <p>Issue: Like previous comments.</p> <p>Changing in titles and figure numbers appears to have resulted in a discrepancy between the new figure label in the report and the figure reference in the original title box of the drawing.</p> <p>e.g. Figure 1.23: Undefended 1% AEP fluvial event plus 20% climate change uplift on Page 199 is figure 1.17 in the drawing title box.</p> <p>Impact: This makes referencing somewhat problematic and confusing.</p> <p>Solution: Clerical error requiring correction</p>	<p>The Applicants note this comment and have updated all figure references and numbers where appropriate. An updated version of volume 3, Annex 2.3: Flood risk assessment (F3.2.3/F03) has been submitted at Deadline 6.</p>

Table 1.6: REP5-169 – Environment Agency (Responses to ExQ2)

Reference	ExA Question	IP submission	Applicants' response
Q2:8.1.2	<p>Outline Hydrogeological Risk Assessment</p> <p>EA in their deadline 4 submission [REP4-132] raise a number of points in relation to the information in the outline Hydrogeological Risk Assessment of</p>	<p>We are confident that a resolution will be found during the examination. The issues raised are addressed through the developing Outline Hydrogeological Risk Assessment (HyRA). We look forward to reviewing the final version at the</p>	<p>The Outline Hydrogeological Risk Assessment was updated at Deadline 5 (REP5-104) to address the EA's comments. The Applicants received feedback from the Environment Agency on the submitted Outline Hydrogeological Risk Assessment on the 14 October 2025. The Environment Agency noted their</p>

Reference	ExA Question	IP submission	Applicants' response
	<p>Lytham St Annes Dunes SSSI [REP3-061]. Some of the comments relate to similar issues to those being raise by Natural England.</p> <p>a) Please comment on the points raised by the EA and provide a realistic timeline for producing the additional data and information that is being asked for.</p> <p>b) Is it likely that a resolution will be found during this examination?</p> <p>c) Noting the gaps in the groundwater monitoring data that are being highlighted, that make validation of the groundwater conceptual model challenging, if the issues raised remain as outstanding by the end of this examination, please suggest a mechanism or a specific wording that would ensure appropriate actions will be taken post consent.</p>	<p>next Deadline. The detailed HyRA is secured through Requirement 8.</p>	<p>satisfaction with the submitted Outline Hydrogeological Risk Assessment as it sufficiently addresses their concerns and are satisfied that further details will be provided in the detailed Hydrogeological Risk Assessments which will be prepared post consent. The comments received from the Environment Agency are in Table 2.4 below. In response to the comments received from the Environment Agency the Applicants have updated the Outline Hydrogeological Risk Assessment at Deadline 6 (S_D3_6/F03).</p>

Table 1.7: Environment Agency response to the outline hydrogeological risk assessment

Reference	Issue Ref REP4-132	Topic	Environment Agency Position at Deadline 5 and response to Version F02 (REP5-104) submitted at D5	Applicants' response
REP4-132	REP4-132 132.2	Geological setting	<p>Satisfied</p> <p>We are pleased to see the inclusion of the requested borehole logs. We agree in principle with the current preliminary hydrogeological conceptual model.</p>	<p>The Applicants welcome the Environment Agency's agreement with the preliminary hydrogeological conceptual model.</p>

Reference	Issue Ref REP4-132	Topic	Environment Agency Position at Deadline 5 and response to Version F02 (REP5-104) submitted at D5	Applicants' response
REP4-132	REP4-132 132.2	Geological setting	Satisfied Naming inconsistency has been resolved Relative interfaces of Blown Sand, Middle Sand and Glacial Till have been revised in the text and now reflect the as-observed borehole logs better.	The Applicants welcome the Environment Agency's agreement on this point.
REP4-132	REP4-132 132.4	Groundwater monitoring	Satisfied We are pleased to see the current uncertainties reflected in the report and note that Section 5.1.1.1 states that the hydrogeological risk assessment will be informed by ground investigation information(s) where necessary and practicable. We are content that these can be carried out post-consent as necessary to inform detailed the detailed HyRA and detailed design. The Environment Agency should be consulted on the scope of these investigations.	The Applicants welcome the Environment Agency's agreement on this point. The Applicants will continue to consult with the Environment Agency on relevant matters.
REP4-132	REP4-132 132.5	Groundwater monitoring	Satisfied See response to REP4-132 132.4. Please note that although the proposals are for ground investigation where necessary and practicable, we do not consider the current information to be sufficient to form the basis of the detailed HyRA. We look forward to agreeing the scope of further investigation to inform the detailed HyRA post grant of DCO.	The Applicants welcome the Environment Agency's agreement on this point.
REP4-132	REP4-132 132.6	Groundwater monitoring	Satisfied The report has been updated. We note that no water strikes are recorded for borehole MORGAN_A2_CP01B, but that water was added to aid drilling from 1.2 mbgl to 16 mbgl. This is likely to have masked any water strikes and we consider no	The Applicants welcome the Environment Agency's agreement on this point. The Applicants confirm that section 2.4.3 of the Outline Hydrogeological Risk Assessment submitted at Deadline 6

Reference	Issue Ref REP4-132	Topic	Environment Agency Position at Deadline 5 and response to Version F02 (REP5-104) submitted at D5	Applicants' response
			conclusions can be made about groundwater presence/absence below 1.2 mbgl in this location. The report should take this source of uncertainty into consideration.	(S_D3_6/F03) has been updated to reflect the considerations on uncertainty of groundwater strike from 1.2 to 16 m bgl.
REP4-132	REP4-132 132.7	Heat impacts	The edits to Sections 3.4.3.7 to 3.4.3.13 are welcomed. These are not currently reflected within Table 3-2, which continues to refer to the low conductivity of dry sand as a mitigating factor.	The Applicants confirm that Table 3.3 (formerly Table 3.2) has been updated to align with the edits to sections 3.4.3.7 to 3.4.3.13 and the updated Outline Hydrogeological Risk Assessment has been submitted at Deadline 6.
REP4-132	REP4-132 132.8	Heat impacts	We understand that where sections 3.4.3.8, 3.4.3.10 and 3.4.3.11 refer to 'offshore' cables these are situated onshore but considered 'offshore' specification due to be being on the seaward side of the TJBs.	The Applicants note the response and confirm the EAs understanding is correct.
REP4-132	REP4-132 132.12	Dewatering	Satisfied Satisfied that this information can be provided at detailed design stage in the detailed HyRA.	The Applicants welcome the Environment Agency's agreement on this point.
REP4-132	REP4-132 132.9 and 132.10	Dewatering	Satisfied Satisfied that these risks to the point of dewatering and the golf course abstractions are now referenced in the report and any contaminated groundwater would require assessment to determine management and disposal.	The Applicants welcome the Environment Agency's agreement on this point.
REP4-132	REP4-132 132.13	Dewatering	Satisfied Table 3-2 has been updated accordingly. Satisfied with this position based on the current information.	The Applicants welcome the Environment Agency's agreement on this point.
REP4-132	REP4-132 132.14	Dewatering	Sections 3.4.2.2 to 3.4.2.4 now provide rationale to demonstrate that worst-case parameters would not result in a radius of influence from Exit Pits to the SSSI boundary. Satisfied with this outcome.	The Applicants welcome the Environment Agency's agreement on this point

1.6 Lancashire Association of Local Councils Fylde Area Committee Energy Working Group

Table 1.8: REP5-173 – Lancashire Association of Local Councils Fylde Area Committee Energy Working Group (Deadline 5 Submission)

Reference	IP submission	Applicants' response
REP5-173 173.1	<p>Continuing Imbalance of Harms and inadequate consideration of the Obviously Material Alternative</p> <p>Thank you for visibility of your questions, which we note and, as a result, would like to communicate that we we reserve our position to provide further inputs regarding the overwhelming imbalance of unresolved unacceptable harms and the inadequate consideration of the obviously material alternative, prioritising the utilisation of already provisioned infrastructure. This is consistent with the advice to Government by NESO in respect of the Clean Power 2030 Action Plan (see section 5.2 at this link - https://www.neso.energy/document/346651/download).</p>	The Applicants note this response.
REP5-173 173.2	<p>The applicants and National Grid, both seem to rely on making reference to the 2022 Holistic Network Design Review (HNDR) to support their claims that any form of consistent assessment was undertaken in assessing Stanah/Hillhouse Technology Enterprise Zone(HTEZ) and Penwortham/Greenbelt. However, the HNDR is completely silent on the assessment of Stanah, nor any presentation of a consistent comparison, using the declared Offshore Transmission Network Review (OTNR) objectives. A simple word search of the HNDR for "Stanah" evidences that there are no references, never mind assessments (see link https://www.neso.energy/document/262681/download). If such an assessment had been conducted, then logically, the records showing such a consistent comparison should be readily capable of being made available. To date, that appears to remain not to be the case.</p>	The Applicants note that this would be a matter for NESO to comment on.
REP5-173 173.3	<p>Accompanied Site Visit to Hillhouse Technology Enterprise Zone</p>	The Applicants have no comment to make on this matter.

Reference	IP submission	Applicants' response
	<p>It is noted that in spite of requests from you for sites to be visited, you do not appear to have yet taken up the option for an accompanied site visit into the privately owned land that comprises the Hillhouse Technology Enterprise Zone (HTEZ) that provides : open space access to the Irish seashore, avoiding the Ribble & Alt and other SPAs and MCZs; connection to the existing National Grid infrastructure via Stanah including to Penwortham and also consumers nationally; and providing a fully serviced and nationally designated development 138 hectare site to host further transmission infrastructure including that of National Grid and Developers of Morgan, Morecambe and Mooir Vannin projects in an efficient, coordinated and economic manner, with drastically less emission, ecological, environmental, community, community and safety harms. This seems at variance to the multiple representations, including those of the site owner NPL and local Wyre Borough Councillor. We would welcome clarification from you as to why that is.</p>	

1.7 National Grid Electricity Transmission PLC

Table 1.9: REP5-176 – National Grid Electricity Transmission Plc (Response to ExQ2)

Reference	ExA Question	IP submission	Applicants' response
Q2:1.2.1	<p>Alternative route</p> <p>NCFPC have made further submission at D4 about a possible alternative route utilising the existing Stanah substation and the Hill House Technology Enterprise Zone [REP4-166] including comments on the previous representation from NGET in response to ExQ1.2.1 on this matter [REP3-088]. A further representation has also been received from Lancashire Association of Local Councils Fylde Area Committee Energy Working Group [REP4-160].</p> <p>The applicants and NGET are asked to provide comment on these submissions</p>	<p>The National Energy System Operator (NESO) took over the electricity network planning responsibility from National Grid Electricity System Operator Limited (NGESO) on the 1st October 2024. The National Energy System Operator (NESO) operates the electricity transmission system throughout Great Britain and is an independent government-owned body separate from National Grid. National Grid Electricity Transmission owns and manages the high voltage electricity transmission network in England and Wales.</p> <p>This is a response from NGET only. Please consult with NESO separately from NGET.</p> <p>It is understood that NESO has previously provided the following information: “NESO alongside the Transmission Owners are responsible for recommending and agreeing appropriate interface points for connections to National Energy Transmission System (NETS) as required by our licence Condition E12 and in accordance with the Connection and Use of System Code (CUSC)”.</p> <p>To connect customers to the National Grid Electricity Transmission (NGET) network, NGET must adhere to certain technical specifications and standards including the Security and Quality of Supply Standards (SQSS). Having reviewed the SQSS requirements to connect Morgan and Morecambe at Stanah, NGET has determined that Stanah is not currently a quality safe standard (SQSS) compliant substation. It is a supergrid transformer (SGT) compound that was built to supply a local Distribution Network Operator (DNO) network.</p> <p>It is not possible to upgrade the existing Stanah substation to a 400 kilovolt (kV) SQSS compliant substation due to the neighbouring homes surrounding the site, which prevents NGET from extending the substation.</p>	<p>The Applicants note the responses from NGET and have no further comments to make on the responses provided.</p>

Reference	ExA Question	IP submission	Applicants' response
		<p>Due to these constraints, to connect Morgan and Morecambe in Stanah, a new 400 kV SQSS substation would need to be built, in addition to a new overhead line from Stanah to Penwortham. The cumulative impact for building this new infrastructure, in addition to Morgan and Morecambe's cable route would therefore be significantly greater than the current proposed connection at Penwortham.</p> <p>Under our license obligations and ensuring value to consumers, before building anything new, NGET considers the capacity, as well as a number of other factors such as power and load requirements, of its existing infrastructure to facilitate new connections. If it is not possible to connect a customer at an existing substation and there is further demand in the area, this may trigger the needs case for building a new substation.</p> <p>We are not able to assume Hill House Technology Park would be a suitable location for hosting high voltage electricity infrastructure. When deciding where to position a new substation, NGET undertakes a site selection study to determine the best possible location, according to cost and efficiency.</p> <p>As part of this process, NGET engages with landowners near the site and assesses any potential environmental impacts to the land, whilst ensuring that all the technical requirements for a safe build and operation of a substation can take place. This process can take a number of years and also requires NGET to be granted planning consent, as well as securing any land rights that may be needed ahead of constructing the new substation.</p> <p>For Morgan and Morecambe's connection, Penwortham has been identified as having the capacity and flexibility on site to facilitate these connections, removing the need for NGET to build a new substation.</p>	

1.8 Newton with Clifton Parish Councils and Freckleton Parish Council

Table 1.10: REP5-185 – Newton with Clifton Parish Council and Freckleton Parish Council (Supplement to Representation REP4-166)

Reference	IP submission	Applicants' response
REP5-185 185.1	<p>Overview</p> <p>Since the issue of the rebuttal of the Applicant's claims (REP3-088) regarding the "Obviously Material Alternative Route" which would place the Wind Farm substations at Hillhouse instead of between Newton, Clifton and Freckleton as well as Penwortham and make use of an existing 400kV National Grid Transmission Line in place of trenching two wind farms for 30km across the Fylde, thereby saving approximately £900m (REP2-064 Table 1) , further extremely relevant local developments have taken place which may be material to the forthcoming decision process.</p> <p>This note summarises these developments, which strengthen the demand for power at Hillhouse, as an addendum to the rebuttal that was issued at REP4-166.</p> <p>These developments would also contribute to further future cost savings arising from not having to pay possible "Curtailement" charges that are paid when the National Grid system is incapable of absorbing the produced energy from wind farms or other sources.</p>	<p>The Applicants refer the Parish Councils to Annex 2.6 to Applicants' Response to Deadline 4 submissions from Statutory Consultees and other organisation: Newton with Clifton Parish Council and Freckleton Parish Council (REP4-166, -167, -168), which was submitted at Deadline 5 (REP5-125) and which addresses these points in detail.</p> <p>The Applicants have previously set out their position on these matters within section 2 of the Applicants' response to Hearing Action Points: ISH1 6, 8, 9, 19, 26 & 28 (REP1- 039). The Applicants have also previously set out (in Section 3 of REP1-039) the respective roles and statutory functions of NESO, NGET and the Applicants in determining the Point of Interconnection.</p> <p>The Applicants also refer to the submission made by National Grid at Deadline 5 in response to the Examining Authority's Written Question 1.2.2.</p>
REP5-185 185.2	<p>An Obviously Material Alternative Option for Connection</p> <p>The option that has been described in the previous submission has sufficient capacity with the existing Grid Transmission Lines to accommodate the three current proposed wind farms in the Irish Sea, i.e. Morgan, Morecambe and Mooir Vannin, especially when these are running at their normal output capacity, typically 40- 50% of the stated maximum output. (See Ref: Digest of UK Energy Statistics, DESNZ (for 2019-2023, published July 2024). The circuit that connects to Stanah could have carried this load</p>	<p>Please refer to the Applicants' response at REP5-185.1 above.</p>

Reference	IP submission	Applicants' response
	<p>as it stood, but has undergone a recent reconductoring by NGET, which has ensured that the Tee has the same capacity as the rest of the 400kV ring between Heysham and Penwortham.</p> <p>We agree that the current Stanah substation was not designed to have the required level of capability, in this respect and that new substations would be required.</p> <p>However, adjacent to Stanah is the Hillhouse TEZ, which still has space in abundance for such installations, each comprising of a new substation and the necessary duplex switch gear to ensure the Power Quality required for connection. Maintenance of the Power Quality is the key for safe connection, and this is determined by the substation design. If the necessary Power Quality is achieved then connection can be completed to any convenient point of the Grid, such as either Stanah or Penwortham.</p> <p>However, Hillhouse has the obvious advantage of available space and a willing owner, whereas Penwortham has been stated by NGET in REP3-088 and their response to ExA Q,1.1.6 to be too small and in need of expansion, which requires Compulsory Purchase of Land from the areas around the substation, including Green Belt. No such application has yet been forthcoming to acquire the required land, and no apparent account has been taken of the additional requirements for space imposed by the Mooir Vannin project, which has also been directed to Penwortham.</p> <p>The quoted savings from use of the Obviously Material Alternative Route included an allowance for such a new facility as the assumption is that the equipment otherwise destined for Penwortham could be redirected instead to the Hillhouse TEZ.</p>	

Reference	IP submission	Applicants' response
	<p>The correspondence available from NGET implies that an engineering solution, as proposed, would be possible even if a new transmission line were needed at some point in time, but this has not been assessed, nor has it been costed for comparison with the proposed solution.</p> <p>Overhead lines have far more capacity for power carriage and at significantly reduced costs. Whilst these may be visually intrusive to some, additional lines are less intrusive where they already exist and they are far less damaging to the environment in general as they do not prevent subsequent use of the land beneath their routes, whilst trenched facilities leave permanent issues as noted in many of the representations presented to this Examination, for example the SoCG between the Applicant and the Newton with Clifton and Freckleton Parish Councils, also to be published at Deadline 5.</p>	
REP5-185 185.3	<p>Sustainable Business Enabler/Opportunities</p> <p>In the event of the Transmission Line from Stanah not being able to take all the available power and in the absence of any upgrade of the Stanah to Penwortham line, any excess power that is not able to be absorbed into the National Grid should be employed locally at Hillhouse, where there are plans in being for the manufacture and storage of green hydrogen. This would be in line with NPS EN-1 Para 2.3.4 and would help negate the necessity to employ the current "curtailment" payments when the generated power cannot be absorbed by the Grid.</p> <p>Currently, the local MP for Fleetwood & Blackpool North and Wyre Borough Council, in partnership with the owners and users of Hillhouse, is actively pursuing the development opportunities that the Hillhouse site affords, including the use of the site for the generation of green hydrogen for either long term energy storage or an alternative source of power generation and/or possible location of future power sources (e.g. Small Modular Reactors),</p>	<p>Please refer to the Applicants' response at REP5-185.1 above. It would not be appropriate for the Applicants to comment on this proposal as any such works would be solely within the remit of National Grid, who have already made clear that connections at Stanah are not possible.</p>

Reference	IP submission	Applicants' response
	<p>using the Hillhouse site for these purposes. A brochure from her is appended to this document.</p> <p>Further, this philosophy has now been adopted and incorporated into Lancashire County Council's plans, specifically in their Lancashire Growth Plan – People, Places and Potential, provided as part of the Parish Councils' response to Deadline 4 submissions.</p> <p>The combined vision is to use the power where generated and use any excess capacity to supply the requirements of the Grid, which fits the declared objective of the Secretary of State for Energy Security and Net Zero.</p>	
<p>REP5-185 185.4</p>	<p>Benefits of the Obviously Material Alternative Route</p> <p>The assessment of the cost benefit overall by shifting the permitted connection point away from Penwortham has already been estimated at approximately £900m using the independent IET report data if just Morgan and Morecambe Wind Farms are considered. The savings if the third Wind Farm, Moor Vannin, is included at Hillhouse increase toward £1.5bn.</p> <p>If Hillhouse becomes an energy centre there will be further savings, based upon the cessation of the now customary "Curtailment" payments to Wind Farms to stop production when their power cannot be absorbed by the National Grid.</p> <p>Use of Hillhouse Site for these Irish Sea Windfarm projects which are proposed to land on the shores of the Fylde Coastal Plain, would appear to offer a very significant beneficial approach, removing, at a single stroke, all of the adverse issues which appear to be intractable at present with the Morgan & Morecambe proposals, from the bird-strike problem, severe residual Highways safety risks, the community and business</p>	<p>Please refer to the Applicants' response at REP5-185.1 above.</p>

Reference	IP submission	Applicants' response
	impacts of the development on critical Green Belt and protected species both on land and off-shore, and all the issues around the need for relocation of wild-life and the bio-diversity net gain issues.	
REP5-185 185.5	<p>Conclusions</p> <p>It is essential that the decision driving the choice of Penwortham as a single point of connection be revisited urgently, given the range of issues that appear with implementation around the Applicants' current proposals and the existence of a material alternative route of transmission from generator to consumer via Stanah, HTEZ, Penwortham and beyond.</p> <p>Currently, the DCO process offers no possibility of adopting such a change. Consideration to a "Process Improvement" would appear to be essential. Without this, this project under examination should not proceed.</p>	Please refer to the Applicants' response at REP5-185.1 above.

Table 1.11: REP5-186 – Newton with Clifton PC and Freckleton PC (Hearing submission)

Reference	IP submission	Applicants' response
REP5-186 186.1	"The proposed changes to the application, which themselves seemed subject to further change, would not be ready until near the end of the examination and there would not be time for proper consideration of them within the examination. This is unacceptable. It is clear that the application was made prematurely before many significant issues had been tackled, never mind resolved, including bird strike risk in particular. In particular we noted that changes involving Leach Lane have been proposed in advance of any consultation with local residents and the documents concerning the changes were incomprehensible. We are pleased that the ExA agreed with our	The Applicants note the comments from the parish council and can confirm that the change request was accepted by the Planning Inspectorate on the 26 th of September 2025. The change request process included an appropriate consultation period, as evidenced by the fact it has been accepted by the Planning Inspectorate and noted as such in the acceptance letter (Rule 8(3) and 9 letter of 26 September 2025 (PD-014)). This was also acknowledged by the Examining Authority during Compulsory Acquisition Hearing 3 (see 00:06:46:18 - 00:07:21:01 of Recording of Compulsory Acquisition Hearing 3 (CAH3) - Part 2 – 09 October 2025 (EV11-005)).

Reference	IP submission	Applicants' response
	<p>points that the consultation should be meaningful and allow local residents to engage on an informed basis, and their recent direction that consultation take place over 32 days."</p> <p>The proposed changes have now been submitted for consultation. However the concerns we raised at the hearing, namely that the documents shared were incomprehensible, have not been addressed. What we have does not make any sense to local residents and seems designed to minimise responses by not explaining the impact of these changes (including on the proposed partial closure of Leach Lane shared by the applicant at the last Open Floor Hearing). These concerns are shared by St Annes Town Council, a TASC member. Therefore this is a complaint about the applicant's approach to the consultation. We would ask the Examining Authority to review the consultation documents and ask for any changes required to enable a fair and informed consultation over 32 days with local residents and stakeholders in line with the Examining Authority's direction.</p>	

Table 1.12: REP5-187 – Newton with Clifton PC and Freckleton PC (Response to ExQ2s)

Ref	ExA Question	IP submission	Applicants' response
Q2.1.1.3	<p>Construction Scenarios</p> <p>a) NCFPC has made representations calling for simultaneous construction [including REP4-167] and states that "many environmental impacts would be more than doubled if the projects were built consecutively</p>	<p>In our response at Deadline 4, we indicated that any interval between the construction of the two projects could exacerbate adverse impacts, as significant portions of land may remain unrestored during the interim, prolonging the total duration of disturbance beyond simply doubling each project's construction period.</p> <p>This is likely to have transport impacts if roads or paths remain unavailable, visual impacts if any construction apparatus is left behind, ecological impacts if habitats remain unrestored and/or continue to be affected by construction</p>	<p>The Applicants have responded to this question within Annex 5.1 to the Applicants response to ExQ2 submitted at Deadline 5 (REP5-130)</p>

Ref	ExA Question	IP submission	Applicants' response
	<p>rather than concurrently". Noting that NCFPC intends to provide a fuller justification for requiring simultaneous construction at deadline 5 (D5), could it include within this a fuller justification of why it considers that many impacts would be more than doubled?</p>	<p>apparatus, land quality impacts if farmland remains unrestored and unavailable, and water impacts if temporary impermeable surfaces remain in place.</p> <p>An undetermined gap between activities ought to necessitate initial restoration efforts following the first project. However, full recovery and reinstatement of the affected land is a variable process influenced by the quality of restoration, local land characteristics, and prevailing weather conditions.</p> <p>The commencement of the second project may be complicated by existing underground infrastructure, potentially requiring design modifications to accommodate changes resulting from the initial construction. Additionally, these pre-existing structures may impede planned access and subsequent works for the second build.</p> <p>Accurate documentation and rigorous configuration control during the first construction phase are essential to mitigate such issues; however, without mandated requirements, there can be no assurance of uniformity or precision in record-keeping.</p> <p>We also wish to highlight potential conflicts with the government's Sustainable Farming Incentives, which reward practices such as reduced tillage to preserve soil health, fertility, structure, and water retention, while minimizing runoff and maintaining organic matter. These benefits are further extended to carbon management, water quality, biodiversity, and the protection of historic environment features—all of which may be jeopardized by trenching across valuable agricultural land.</p> <p>For instance, both cable routes for the projects traverse the same fields, necessitating the removal of hedgerows and ponds and cutting through multiple land drains. As a result, complete reinstatement after the initial project cannot occur until both projects have concluded.</p>	

Ref	ExA Question	IP submission	Applicants' response
		Given these factors, accurately predicting the timeframe for full land restoration becomes highly uncertain, and there exists a finite possibility that full recovery may never be achieved. Any time that lack of restoration is extended because of the time between the two projects is an impact that is greater than the individual impacts of the two projects. This situation prompts critical questions regarding the establishment and assessment of successful restoration standards, and the identification of parties responsible for certifying satisfactory outcomes.	
Q2:1.1.5	Outline Communication Plan An updated Outline Communications Plan has been submitted by the applicants at deadline 4 (D4) [REP4- 029 c) Do the local authorities and parish councils consider that the creation of a local liaison committee should be retained in the outline plan?	<p>The view of NCFPC is that a Local Liaison body of some form is essential to ensure that good two-way communication is established, given that prior to this point in time, communication has been markedly deficient, as has been noted in a number of responses from Lancashire County Council and Fylde Borough Council and others as well as ourselves throughout the process. We have also referenced this in our related submission.</p> <p>Communication has remained a significant issue and details of our comments are contained within the SoCG between the Applicants and ourselves, which forms part of this Deadline 5 submission. Given the controversial nature of this project the Parish Councils find it very disappointing that the Applicants are seeking to reduce community liaison going forwards.</p>	The Applicants confirm that the local liaison committee has been added to the Outline Communications Plan at Deadline 6 (J1.1/F05).
Q2.1.1.7	Critical National Priority Paragraph 4.2.4 of National Policy Statement (NPS) EN-1 (published November 2023) sets out the Government's conclusion that there is a critical national priority (CNP) for the provision of nationally significant low carbon infrastructure.	<p>The current Application would provide a maximum of 2GW of energy to the National Grid, or 0.27% of the possible capacity.</p> <p>Whilst accepting that Green Energy sources are critical to the Government plans to decarbonise the energy infrastructure, it might be argued that, given the total of some 750GW of power covered by the current list of applications before them, any single application, particularly when facing significant challenge to its viability and the substantial harms that result to offshore and onshore protected areas and green belt, might actually fall out of this category after due assessment.</p>	<p>The Applicants emphasise that the range of other developments coming forward do not change the critical nature of the Morgan and Morecambe Offshore Windfarm projects, along with the associated Transmission Assets. This is confirmed by NPS EN-1 and in particular the following paragraphs:</p> <p><i>3.2.3 It is not the role of the planning system to deliver specific amounts or limit any form of infrastructure covered by this NPS. It is for industry to propose new</i></p>

Ref	ExA Question	IP submission	Applicants' response
	<p>Paragraph 4.2.7 goes on to explain that the CNP policy applies following the normal consideration of the need case, the impacts of the project, and the application of the mitigation hierarchy.</p> <p>Paragraph 4.2.11 says that applicants should demonstrate that all residual impacts are those that cannot be avoided, reduced or mitigated and 4.2.12 says that applicants should set out how residual impacts will be compensated for as far as possible.</p> <p>a) For clarity and the avoidance of doubt, for each topic area the applicants are requested to set out (including any relevant crossreferencing to relevant documents) how they have met the test in paragraph 4.2.11 of NPS EN-1 that applicants must apply the mitigation hierarchy and demonstrate that it has been applied.</p> <p>b) It is assumed that the mitigation hierarchy has to be demonstrated to have been applied for each</p>	<p>The Application clashes with some of the key premises in the NPS, in respect of use of Green Belt, interference with Protected Sites and generates an unwarranted "Risk to Life" situation with regards to Bird Strike.</p> <p>The best possible mitigation strategy that could be adopted for all of these aspects would be to have NESO/NGET accept the proposed "Obviously Material Alternative" which utilises already existing Grid Infrastructure as far as is possible.</p> <p>Incidentally, this would save some £900million in costs that will otherwise be passed on the Consumers, so fails the all three tests of Smarter, Cleaner and Cheaper.</p> <p>The Parish Councils do not believe that the mitigation hierarchy has been properly applied for at least some topic areas given e.g. the use of BMV and flood-sensitive land for substations, flood-sensitive land, the misapplication of BNG and an alternative route that is around one tenth of the length and nearly £1bn cheaper.</p>	<p><i>energy infrastructure projects that they assess to be viable within the strategic framework set by government.</i></p> <p>3.2.4 <i>It is not the government's intention in presenting any figures or targets in this NPS to propose limits on any new infrastructure that can be consented in accordance with the energy NPS. A large number of consented projects can help deliver an affordable electricity system, by driving competition and reducing costs within and amongst different technology and infrastructure types.</i></p> <p>3.2.6 The Secretary of State should assess all applications for development consent for the types of infrastructure covered by this NPS on the basis that the government has demonstrated that there is need for those types of infrastructure which is urgent...'</p> <p>Every proposed development which falls within the remit of being 'critical national priority', is critical in its own right and it is vital that these projects come forward in order to address the UK Government's net zero targets. Notwithstanding this point, the needs case for the Transmission Assets weighs in favour of granting consent for the development, regardless of whether or not the Transmission Assets would be classed as CNP.</p> <p>In respect of NPS policy and Green Belt, the Applicants would refer to the Green Belt Technical Note which was submitted at Deadline 4 (REP4-092).</p>

Ref	ExA Question	IP submission	Applicants' response
	relevant topic area and that, if it has not been demonstrated to have been applied for just one topic area, then this would mean that the CNP policy would not be applicable for the application as a whole. Do you agree with this interpretation?		<p>Blackpool Airport and BAE Systems have existing mitigation in place for bird strike as this is an issue they are already dealing with on an ongoing basis. The Applicants have engaged with Blackpool Airport and BAE Systems and DIO in great detail. Blackpool Airport has agreed that there would be no increase in bird strike risk as a result of the Project. The Applicants are still working with BAE and DIO to ensure a solution, like at Blackpool Airport, can be reached, which we are confident in achieving. In doing so, there would be no increase bird strike risk at either facility and therefore all safeguarding measures would remain unchanged.</p> <p>In relation to the alternative site selection point, please refer to the Applicants' response at REP5-185 1.1 above.</p> <p>Finally, in response to the comment on the application of the mitigation hierarchy, please refer to the Applicants' submission at Deadline 5 in response to the Examining Authority's Written Question 1.1.6 (REP5-132).</p>
Q2.1.2.2	East Irish Sea Transmission Project The East Irish Sea Transmission Project Environmental Impact Assessment Scoping Report was submitted to the Planning Inspectorate in August 2025. This includes two possible grid	The most obvious relevance of the EISTP documentation to the current application relates to the choices of options for their landing site on the coast, for which, from their opening discussions held on 12th September, the favoured site is Rossall Beach, thence to the Hillhouse TEZ. This aligns with the "Obviously Material Alternative" that has been put forward. Further, it is clear that they have been instructed to take their power to Penwortham by NESO, although they are actively pursuing the possibility of connection at the Stanah Tee as an issue to resolve prior to moving to DCO. This is	The Applicants provided a response to this question within its Response to Examining Authority's Written Questions (ExQ2) (REP5-130)

Ref	ExA Question	IP submission	Applicants' response
	connection routes options. Are there any matters of relevance arising from the information available in that Scoping Report for the consideration of site selection and alternatives of the Morgan and Morecambe Transmission application?	<p>relevant because the Applicants should also have considered this landfall with its reduced impacts.</p> <p>They also agree that the issue of connecting to the Heysham-Penwortham 400kV ring is the control of the power quality, as suggested in REP1-183, REP2- 059, REP3-100 and REP4-166, which is the duty of the substations and their switchgear and control systems to carry out.</p>	
Q2.4.1.3	<p>Bird Strike Risk</p> <p>The CAA published CAP772 which addresses wildlife hazard management at aerodromes. This refers to a 13km zone and suggests that safeguarding systems could be put in place which could influence land use and any development surrounding the aerodrome such that the strike risk does not increase and, where practicable, is reduced.</p>	<p>The Bird Strike risk is most important as this associates with a Hazard that has the potential to result in loss of life, not only to the persons on board but to those on the ground where the resulting trajectory of the vehicle takes it, whether partially controlled or not.</p> <p>The level of risk is driven by the overall bird population density primarily. Any development that unacceptably increases the risk should be refused.</p> <p>The mandated 13km zone (reference NPS EN 1 Para 5.5.41) derives from the culmination of years of analysis of incidents and experience of developing safe operations and design guidance.</p> <p>Safety of life is not negotiable.</p>	<p>The Applicants submitted an updated Outline Wildlife Hazard Management Plan at Deadline 5 (REP5-106) which included a draft Wildlife Habitat Attractants Risk Assessment for Warton Aerodrome. The document considered the likelihood of the specific elements of the Transmission Assets to potentially cause a change in abundance, species and patterns of use of birds within Warton Aerodrome's 13 km safeguarding area. The approach followed by the draft Wildlife Habitat Attractants Risk Assessment was in accordance with the CAP 795 guidance. The draft Wildlife Habitat Attractants Risk Assessment concluded that with the implementation of design commitments and an adaptive management approach (supported by a detailed monitoring strategy) the Transmission Assets would not cause a significant change in abundance, species and patterns of use within Warton Aerodrome's 13 km safeguarding area.</p> <p>The Applicants note that they have been working with BAE Systems on the preparation of the draft Wildlife Habitat Attractants Risk Assessment and have submitted an updated document at Deadline 6 to address the comments from their review.</p> <p>The Applicants also note BAE Systems' deadline 5 submission (REP5-161) which stated that '<i>whilst BAE</i></p>

Ref	ExA Question	IP submission	Applicants' response
			<p><i>Systems must reserve its position until the aforesaid work [bird strike risk assessment for Warton Aerodrome] is undertaken, it is considered unlikely that there will be an unacceptable risk to / or interference with operations at Warton Aerodrome and the Aerodrome's ability to perform its defence role (with specific regard to bird strike) provided appropriate mitigation measures can be identified and put in place'. The CAP772 guidance makes provision that risk levels do fluctuate, however as long as there is a robust monitoring plan and appropriate mitigations in place these fluctuations can be appropriately managed. In the Outline Wildlife Habitat Attractants Risk Assessment (F02) the Applicants have proposed monitoring alongside a range of CAP772 compliant measures designed to immediately and safely reduce risk at all of the different components of the Transmission Assets. This approach aligns with BAE's response to an ExA question at ISH4 day 2:</i></p> <p><i>"In response to a question from the ExA regarding their earlier submissions on bird strike risk, BAE clarified that they had not stated that mitigation is "not possible". Rather, they reiterated that they cannot confirm whether suitable mitigation exists until the risk assessment is undertaken."</i></p> <p>Although this issue may not be resolved by the close of examination, the Applicants, and BAE are aware that there are sufficient measures available to mitigate this risk, and the Applicants are committed to continuing to work alongside the DIO's subject matter experts to identify the appropriate measures on an area-by-area basis.</p>

Ref	ExA Question	IP submission	Applicants' response
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 offsite, 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 (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>If SoS was minded to agree with BAE Systems position, can the applicant comment on the quoted</p>	<p>We have also referenced this in our related submission. The Bird Strike issue is most important as this represents a Hazard that has the potential to result in loss of life, both in air and on the ground and by attempting to mitigate it the Applicants are reducing the biodiversity quality of their already inadequate BNG proposals without assessing this.</p> <p>The hazard is primarily affected by the density of the bird population. The proximity of the SSSI's, Martin Mere and Ribble make the area an important habitat and part of the East Atlantic Flyway migration route. The two substations will displace thousands of birds primarily in autumn and winter.</p> <p>The hazard can develop in various ways – damage to the aircraft and/or injury to the crew of the vehicle followed by the consequences of that stage in terms of whether the aircraft can be controlled or whether a crash of the aircraft results, with or without crew or passengers.</p> <p>From a Town and Parish perspective, it is the aircraft crash that represents the real concern, as we have heard articulated by residents close to Blackpool Airport at the various reviews. This is a third-party risk in which all residents of the Fylde have an interest.</p> <p>Whilst the flight paths of the civilian aircraft are somewhat predictable under normal conditions, the aircraft operating from the BAE Systems aerodrome at Warton are less so. There are times when, as part of testing or proving new types, they engage in "high-energy manoeuvres" at low altitudes. Aircraft are involved with tests; sometimes these do not go to plan.</p> <p>Every effort is made to recover these situations, but there are times when the crew have to make an escape and leave the aircraft to its fate. There are many reasons behind loss of control, bird strike is but one of these and is the one most difficult to regulate against and prevent.</p> <p>Freckleton was the site of the worst "loss of life on the ground" accident in the UK, on 23 August 1944, which killed</p>	<p>The Applicants are mindful of the Freckleton air crash and the concerns of the local community.</p> <p>The Applicants refer to its response to Q2.6.2.3 above regarding the approach and conclusions of the draft Wildlife Habitat Attractants Risk Assessment for Warton Aerodrome (appended to the Outline Wildlife Hazard Management Plan submitted at Deadline 5 (REP5-106)). The risk assessment takes into account the evidence presented in the Baseline Bird technical Report (REP3-060) regarding the bird species and trends of bird populations within Warton Aerodrome's 13km safeguarding area.</p> <p>The Applicants have submitted an updated Outline Biodiversity Benefit Management Plan at Deadline 6 which describes its approach to the provision of biodiversity benefit and how it will be delivered. The Transmission Assets project will deliver a minimum of 10% biodiversity benefit, the majority of which will be delivered at the onshore substation sites (and integrated with the landscape/ drainage requirements). The Applicants have provided options for delivering the shortfall of biodiversity credits where a 10% net gain cannot be achieved at the substations, its preferred option being Lea Marsh Fields. These options are described in further detailed in the Biodiversity Benefit Supporting Statement (REP5-145). The Applicants would also note that following a meeting with the DIO and BAE on the 17th October no concerns were raised regarding the proposed habitat enhancements within the biodiversity benefit areas.</p>

Ref	ExA Question	IP submission	Applicants' response
	<p>paragraph 4.6.12 of NPS EN-1?</p> <p>b) If SoS was minded to agree with BAE Systems position and onsite 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 EN1, section 4.6 with additional focus on 4.6.1?</p>	<p>61 people including the crew resulting from aircraft loss of control. The Village has a long memory and respect for those lost!</p> <p>On 2nd April 1975, the first UK Tornado prototype suffered a bird strike whilst on test at Warton, ingesting a herring gull into an engine over Freckleton Marsh, fortunately recovering to land safely, after reaching a lowest altitude approaching 30ft.</p> <p>The last such event was a Tornado which lost control over Blackpool Airport after a failure. This was 28th September 1996. Despite being aimed out to sea, the aircraft crashed on the beach some 800yds from the Pleasure Beach at Blackpool.</p> <p>The risk is always there, as is the associated hazard.</p> <p>The requirement for the 13km zone is well established and justified, deriving from the culmination of years of analysis of incidents and experience of developing safe operations and design guidance.</p> <p>Adoption of BNG areas within this zone seems to fly in the face of the requirements.</p> <p>We would consider that Safety of Life overrules any other requirements.</p> <p>In response to (b) and (c), this is far too late in the examination for the Applicants to be proposing an extensive area of offsite BNG if they are even capable of doing so for it to be properly examined. Unlike Town and Country Planning applications, given the scale of BNG that will be needed, some idea of where it is coming from should be provided while an application is being examined and before it is decided, otherwise the likelihood of it being implemented would be severely reduced and the delivery of the project would be questionable.</p>	

1.9 Orsted East Irish Sea Transmission Ltd and Mooir Vannin Offshore Wind Farm Ltd

Table 1.13: REP5-188 – Orsted East Irish Sea Transmission Ltd and Mooir Vannin Offshore Windfarm Ltd (Deadline 5 Submission)

Reference	IP submission	Applicants' response
REP5-188 188.1	<p>Introduction</p> <p>This submission is provided in accordance with Deadline 5 of the examination timetable for the application made by Morgan Offshore Wind Limited and Morecambe Offshore Windfarm Limited (the "Applicants") for an order granting development consent for the Morgan and Morecambe Offshore Wind Farms Transmission Assets ("Project").</p> <p>We represent Ørsted East Irish Sea Transmission Limited ("OEIST") and Mooir Vannin Offshore Windfarm Limited ("MVOWFL") (together, "Ørsted"), which filed relevant representations (accepted as additional submissions) in respect of the Project.</p> <p><u>This document contains:</u></p> <ul style="list-style-type: none"> • Ørsted's comments on submissions made by the Applicants at examination deadline 4; and • Ørsted's response to the Examining Authority's second set of written questions ("ExQ2") [PD-011]. 	The Applicants note this response.
REP5-188 188.2	<p>Response to key matters in Applicants' deadline 4 submissions</p> <p>Ørsted considers that its previous submissions, especially its post-hearing submission [REP4- 169], address a number of the points raised by the Applicants. In particular, Ørsted's post-hearing submission provides justification for the inclusion of provisions in any development consent order ("DCO") for the Project, to avoid sterilisation of the Penwortham substation. Ørsted does not intend to repeat those submissions, however,</p>	As the Applicants explained in the Applicants' Response to Deadline 3 submissions from Statutory Consultees and other organisations, REP4-094 (specifically the response row REP3-102.3 within this document), the reason a wider swathe of land rights has been sought at the connection point to the Penwortham substation is because the Applicants do not yet know exactly where their connection points will be. On that basis, it is not possible to narrow the area over which rights are sought within the DCO, because otherwise the Applicants risk having insufficient land rights to lay the cables up to the connection point. The Applicants will only draw down permanent rights over the area of land where

Reference	IP submission	Applicants' response
	<p>wishes to briefly reiterate its position in respect of some key issues.</p> <p>First, Ørsted considers it necessary to reiterate that National Grid Electricity Transmission Plc ("NGET") is not responsible for managing the competing interests of different projects connecting at its substations. The Applicants have stated, in response to Ørsted's deadline 3 submissions, that "...it is NGET's responsibility to manage the connections being offered and the feasibility of each customer to connect into and access the substation."</p> <p>As explained in Ørsted's post-hearing submission [REP4-169], NGET is an asset owner which contractually delivers on grid connection. NGET's functions are restricted to physical connections within its control, and do not include the coordination or management of the property acquisition processes related to different developments.</p>	<p>the cables are eventually laid, and this will be determined by the precise connection points as confirmed by NGET in the future.</p> <p>The Applicants are seeking to construct the Transmission Assets pursuant to temporary possession powers, and permanent rights will subsequently be drawn down once it is known where the cables will be laid. Temporary possession powers will only be drawn down over the areas required to undertake the construction works, and permanent rights will be drawn down over a narrower swathe once it is known where the cables will be laid. These will only be sought insofar as rights are required for the operation and maintenance of the Transmission Assets.</p> <p>This will not sterilise the area around the Penwortham substation, as the Applicants have set out in their response to REP5-188.3 below.</p>
REP5-188 188.3	<p>Any DCO granted for the Project will confer considerable powers to the undertaker, including in terms of the property rights surrounding the Penwortham substation. It is misleading to suggest that NGET would have the ability or responsibility to circumvent the provisions of a DCO to ensure access for future developers. As explained in Ørsted's post-hearing submission [REP4- 169], there is an increasing need for developers to coordinate effectively to ensure that the Government's policy goals for renewable energy can be delivered.</p> <p>Ørsted also wishes to respond to the Applicants' position that the inclusion of protective provisions for OEIST's benefit would not be "feasible or appropriate" 2 and that any protective provisions necessary to manage the interface between the developments should be addressed in the consenting process for the East Irish Sea Transmission Project.</p>	<p>The Applicants refer to their response at REP5-188.2 above.</p> <p>The Applicants are not implying that NGET would have the ability or responsibility to circumvent the provisions of a DCO. NGET has a responsibility to the developers with which it enters into a connection agreement to provide a viable connection. NESO also have licence obligations, which in practice require ensuring that the design of connections at substations do not unduly restrict the ability of other developers to connect in the future. It is therefore clearly not in the interest of any party for any project to restrict other developers, who have signed connection agreements, from connecting to the substation, or indeed restrict connection capacity such that National Grid would be unable to offer future connection agreements to other developers.</p> <p>In relation to protective provisions, the examples which Ørsted has provided relate to projects where it was confirmed there would be a smaller gap between their</p>

Reference	IP submission	Applicants' response
	<p>Ørsted disagrees with the Applicants' assertion. There is no requirement that protective provisions can only be provided for the benefit of already constructed/operational developments. It is not unusual for protective provisions to be included in DCOs which protect unconsented projects. For example, the Hornsea Three Offshore Wind Farm Order 2020 contains protective provisions for the benefit of the Norfolk Boreas Offshore Wind Farm, which was consented a year later, in 2021. 3 Similarly, the East Anglia One North Offshore Wind Farm Order 2022 and the East Anglia Two Offshore Wind Farm Order 2022 both contain protective provisions for the benefit of the Sizewell C Nuclear Generating Station,4 which received its DCO several months after the windfarms. This is an appropriate approach to managing the inevitable overlap of interests between projects in the consenting pipeline, and recognises the importance of maintaining a consenting environment which allows for the overarching goals of Government to be met.</p>	<p>respective construction programmes. The developments which were covered by protective provisions within the Hornsea Three Offshore Wind Farm Order, and the East Anglia One North and East Anglia Two Offshore Wind Farm Orders, were to protect projects which were significantly further ahead in their development refinement. Given these projects were all granted consent within a short space of time, there would have been certainty in relation to the siting of infrastructure and scope of works.</p> <p>The East Irish Sea Transmission Limited project is only at scoping stage. As the scoping report for the project sets out two potential cable routes, the design has not progressed with a sufficient level of certainty that would enable the Applicants to enter into meaningful discussions regarding protective provisions. It would therefore be unreasonable and inappropriate for the Applicants to include protective provisions for any proposal which is at such an early stage.</p>
<p>REP5-188 188.4</p>	<p>The site for Mooir Vannin Offshore Windfarm was awarded in 2015. As such, the Applicants have been on notice of potential interaction between transmission assets for some time (and before the bidding process relevant to the Project commenced). Furthermore, the detail of the potential shared grid location has been known since 2024, following the section 35 direction for the East Irish Sea Transmission Project. Notwithstanding that position, the Applicants have failed to engage with Ørsted in any meaningful way in respect of this issue. It would not be fair, or in line with the policy aims as outlined in Ørsted's post-hearing submission [REP4-169], for all responsibility for managing the relationship between these assets to lay with OEIST. As outlined in Ørsted's post-hearing submission, the relevant national policy statements outline a clear expectation that developers coordinate with other projects in terms of design and construction planning. Such coordination is essential in order to achieve the goals of national policy.</p>	<p>The Applicants were aware of the Agreement for Lease (AfL) area in Isle of Man waters at the time it was undertaking its statutory consultation, but there was not a scoping report for the Isle of Man project in the public domain at that time. In any event, this did not relate to the potential for the East Irish Sea Transmission Assets to be connecting into Penwortham substation and, as Ørsted has noted, this information was not available to the Applicants until October 2024, following the section 35 direction.</p> <p>The Applicants have engaged with Ørsted regarding their concerns, however, given the early stage of the East Irish Sea Transmission Assets, there is very limited information available which the Applicants can consider. The design for the Transmission Assets was in the public domain in advance of the East Irish Sea Transmission Project obtaining their Section 35 Direction and it is clear that it is still at a relatively early stage of its design. Given the detailed information available regarding the Transmission Assets the Applicants would expect that Ørsted would have regard to this and aim to design their proposals in such a way</p>

Reference	IP submission	Applicants' response
	<p>Additionally, the Applicants have highlighted that they consider it would be difficult to develop protective provisions for OEIST's benefit because the refined cable route for the East Irish Sea Transmission Project is not confirmed. Ørsted does not share this concern. It is absolutely achievable to develop a suite of effective protective provisions, in circumstances where there are elements of both developments which are uncertain.</p> <p>Ørsted is simply seeking a mechanism which provides for a degree of coordination between the developments, to ensure any interface and potential overlap between the developments is appropriately managed. This is a reasonable request. Furthermore, such coordination would benefit other parties who could be impacted by the Project, including for example, local residents. Local residents and other interested parties will hold a legitimate expectation that developers will liaise to seek to minimise impacts of their developments.</p> <p>A mechanism providing for appropriate coordination could also be achieved through the negotiation of a private agreement. However, the Applicants' clear position is that they do not wish to engage in this way. As such, OEIST must seek for its interests to be protected in in the DCO, via protective provisions.</p>	<p>that there is no conflict between the proposals and so any interactions are either avoided or minimised.</p> <p>The Applicants acknowledge the importance of coordination, as is required where possible by NPS EN-1, to reduce impacts and have sought to explore opportunities for coordination where possible, this includes the recent offer from the Applicants to establish a working group between the Morgan, Morecambe and OEIST projects to provide a forum to discuss and share plans. This could be agreed through a Memorandum of Understanding, on which Morgan and Morecambe are keen to commence discussions.</p> <p>However given the consenting and programme separation between the projects it is not possible or reasonable to coordinate in respect of construction at this stage.</p> <p>In relation to providing protective provisions for the East Irish Sea Transmission Project, the Applicants refer to their response at REP5-188 1.3 above.</p>

Table 1.14: REP5-188 – Orsted East Irish Sea Transmission Ltd and Mooir Vannin Offshore Windfarm Ltd (Response to ExQ2)

Reference	ExA Question	IP submission	Applicants' response
Q2:1.3.3	<p>East Irish Sea Transmission Project</p> <p>a) Does the publication of the East Irish Sea Transmission Project scoping report have any implications in relation to the</p>	<p>The scoping report validates the concerns raised by Ørsted in this examination. The scoping report confirms the scoping boundary previously shared at deadline 3 (Appendix 3 of [REP3-103]) and that the East Irish Sea</p>	<p>The Applicants have previously provided a response to this question within its Response to Examining Authority's Written Questions (ExQ2) - Rev F01 (REP 5 -130).</p>

Reference	ExA Question	IP submission	Applicants' response
	issues raised by OEIST, most recently at deadline 4 (D4) [REP4-169]?	Transmission Project will connect at Penwortham substation. Ørsted considers that the information in the scoping report confirms that the concerns raised regarding possible interface between the projects (both in terms of crossings of transmission infrastructure and access of the transmission infrastructure to Penwortham substation) are valid and must be dealt with.	
Q2:1.3.3	c) What discussions are and will be taking place between the two parties in order to seek resolution of this matter prior to the end of the examination?	<p>OEIST provided a summary of engagement which has taken place between Ørsted and the Applicants to date in its response to ExQ1 [REP3-103]. In that response, OEIST outlined that meetings have taken place since October 2022 regarding potential interactions between the East Irish Sea Transmission Project, the Moor Vannin Offshore Windfarm and the Project.</p> <p>However, despite numerous attempts by Ørsted, the Applicants have, in general, been reluctant to engage in more depth on the particular concerns Ørsted have raised in this examination.</p> <p>OEIST recently (on 15 September) reached out to both Applicants in order to open a dialogue in respect of the specific issues raised in this examination. Morecambe Offshore Windfarm Limited has responded with an offer to meet ahead of the next round of hearings and OEIST is hopeful progress can be made.</p>	<p>The Applicants do not consider that they have been reluctant to engage and consider engagement to date has been appropriate for the stage of development that the OEIST project is at. The engagement has included sharing data with OEIST.</p> <p>Following the publication of the Scoping Report, the Applicants remain committed to further engagement and have recently met with representatives of OEIST to set out the principles of that engagement. Both parties aim to build a working relationship for the benefit of all concerned with the projects.</p>

Reference	ExA Question	IP submission	Applicants' response
		<p>Ørsted is motivated to work with the Applicants to resolve its concerns raised in respect of the Project as soon as possible. However, at this stage, there has been no meaningful attempt by the Applicants to address the matters raised.</p> <p>As noted in Ørsted's post-hearing submission [REP4-169] the UK Government has set out clear ambitions in the NPS-EN1. These ambitions include that a number of new generation and associated grid developments must be</p>	

1.10 SABIC UK Petrochemicals and SABIC Petrochemicals BV

Table 1.15: REP5-189-190 – SABIC UK Petrochemicals Limited and SABIC Petrochemicals BV (Response to ExQ2 and dDCOQ1)

Reference	ExA Question	IP submission	Applicants' response
ExQ2 Q2:1.3.5	<p>SABIC UK Trans-Pennine Ethylene Pipeline (TPEP)</p> <p>Both parties are requested to provide an update on discussions between the two parties concerning the implications of the proposed development for the TPEP?</p> <p>In the event that agreement is not reached, the ExA requests that a Statement of Common Ground is submitted between the applicants and SABIC at deadline 6 (22 October 2025). This should set out the parties final positions, making clear any matters that remain in disagreement, each party's preferred protective provisions, any other drafting change that might be required to any document and a full explanation and justification for the positions being taken.</p>	<p>SABIC are still negotiating protective provisions with the Applicants. Following Compulsory Acquisition Hearing 2, the Applicants provided updated draft protective provisions to SABIC. SABIC has been carefully considering the details of this amended drafting and provided a response to the Applicant on 17 September.</p> <p>Outstanding points in the drafting are limited and centre on negotiating the distances within which SABIC approval is required and insurance cap figures.</p> <p>The overall position in relation to protective provisions is that progress has been made and, at present, there appears to be a reasonable prospect of securing agreement on the wording before the end of the Examination.</p> <p>SABIC welcomes the ExA's request that a Statement of Common Ground is submitted between the Applicants and SABIC at Deadline 6 and will comply with this if an agreement is not reached before 22 October 2025.</p>	<p>The Applicants welcome the continued active engagement from SABIC on protective provisions.</p> <p>The parties have now reached agreement on all matters in the protective provisions and the agreed protective provisions have been included in the draft DCO submitted at Deadline 6 (C1/F09). Accordingly, no Statement of Common Ground has been submitted at Deadline 6.</p>
DCO 1:1.12	<p>Article 33 – Funding</p> <p>SABIC UK reiterated its concerns on this article at deadline 4 [REP4-172] and noted that following a meeting with the applicants it believes there is a way</p>	<p>The Parties are currently seeking to address SABIC's concerns in the protective provisions. The Applicants provided updated drafting to SABIC of the protective provisions on 5 August 2025 which included amendments to paragraph 21 imposing restrictions on the exercise of</p>	<p>The Applicants, in responding to SABIC on 24 September 2025 with updated protective provisions, addressed SABIC's comments on paragraphs 21 and 22 with further amendments to:</p>

Reference	ExA Question	IP submission	Applicants' response
	<p>forward to address this issue, but that there has not been time to work out the detail of this.</p> <p>Could both parties provide an update on the progress being made with this matter including any updated drafting of Protective Provisions. If agreement is not reached, the ExA requests that any necessary alternative drafting is provided to the relevant Protective Provisions (as required) along with a clear justification.</p>	<p>compulsory acquisition powers to ensure SABIC has whole control over issuing their consent for the exercise of any such powers under this paragraph and that consent cannot be granted by way of a decision through arbitration.</p> <p>The Applicants have also confirmed that they will accept the indemnity in SABIC's Protective Provisions which goes towards alleviating SABIC's concerns of incurring loss as a result of the project. SABIC has since provided some minor updated drafting to paragraph 22 on 17 September 2025 which the Applicants are currently considering.</p> <p>Subject to the inclusion of that drafting in the Order, no amendments would be required to article 33 (funding) of the Order, as SABIC's concerns would be addressed through the Protective Provisions.</p>	<p>(i) Impose restrictions on the exercise of compulsory acquisition powers to ensure SABIC has control over issuing consent for the exercise of any such powers under paragraph 21 and that consent cannot be granted by way of a decision through arbitration;</p> <p>(ii) Include drafting to provide a wide ranging indemnity to SABIC to alleviate their concerns of incurring loss as a result of the project and accepted its drafting changes in relation to this.</p> <p>The Applicants and SABIC have now reached agreement on appropriate protective provisions which have been included in the draft DCO submitted at Deadline 6 (C1/F09).</p> <p>In light of this agreement, no further changes are therefore required to article 33 (funding) of the Order as SABIC's concerns have been suitably addressed in the protective provisions.</p>

1.11 South Ribble Borough Council

Table 1.16: REP5-191 – South Ribble Borough Council (Response to dDCOQ1)

Reference	ExA Question	IP submission	Applicants' response
Q1.3.1	<p>Requirement 1 – Time Limits</p> <p>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?</p> <p>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 Development Consent Order (DCO) and any other certified documents?</p> <p>c) The SoS, in granting the Morgan DCO removed the provision for an additional year to deal with any judicial review as</p>	<p>This Council considers that a five-year time limit would be more suitable than a seven-year limit. A shorter timescale would give comfort to residents of all relevant local authority areas that development would not be overly prolonged, and that a comprehensive and up to date assessment of the situation (e.g. ecology, flood risk etc) could be managed. It would also allow plenty of intervening time for judicial review without prejudicing the overall project. No other comments to note with regards to point b).</p>	<p>The Applicants would refer to their response to the Examining Authority's Written Question 5.1.27 (REP5-130), which sets out the justification for why a seven year implementation period is required, noting the specific importance of this now on the basis that the Morgan Generation Assets DCO has been granted with a seven year implementation period. Notwithstanding, 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, the Applicants have amended Requirement 1 of Schedules 2A and 2B (C1/F09) 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 and the Morecambe element of the Transmission Assets to the Morecambe Offshore Windfarm Generation Assets Order 202[●].</p> <p>The Applicants wish to emphasise that they have now committed to establishing a Construction Coordination Working Group, pursuant to the updated outline Code of Construction Practice (REP5-044) (which is secured pursuant to Requirement 8 of Schedules 2A and 2B to the draft DCO). This will facilitate exploration of opportunities for coordination between the parties to minimise disruption and impacts during the construction phase.</p>

Reference	ExA Question	IP submission	Applicants' response
	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		In terms of ensuring a comprehensive assessment for each of the projects, this is secured as appropriate throughout the various management plans which are secured through the DCO requirements.
Q1.3.7	<p>Requirement 6 – Provision of Landscaping</p> <p>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</p>	Whilst it is considered important to have as much detail as possible re: existing and proposed landscaping – and on this point engagement has been lacking in detail and extremely late to the table - it is also realistic to assume that over a lengthy construction period with a relatively long time limit (be that five or seven years), the situation on the ground will inevitably change. This Council would therefore request that full landscaping (existing and proposed) is provided to, and agreed with the local planning authorities prior to each phase of development, rather than an agreed approach for the entire scheme in advance of first commencement.	<p>The Applicants note that details of existing trees and hedgerows to be retained will be included within the detailed Arboriculture Method Statement (AMS). An outline Arboriculture Method Statement was submitted at Deadline 5 (REP5-144).</p> <p>The purpose of the outline AMS is to set out the measures that will be implemented for the protection and removal of trees during the construction of the onshore and intertidal components of the Transmission Assets to reduce impacts to trees. It was discussed at ISH4 that the outline AMS will be updated to commit to identify those trees and hedgerows that will be removed as part of the construction of the Transmission Assets.</p> <p>The outline Landscape Management Plan (oLMP) submitted at Deadline 6 (J2 / F05) has been updated to make reference to the outline AMS and how this will inform the development of the landscaping scheme for the onshore substation(s). The oLMP now explicitly states that the detailed LMP will include identification of trees and hedgerows retained and those that will be planted to implement the landscape mitigation scheme.</p>
Q1.3.12	<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</p>	a) – inclusion of the word ‘and’ at the end of point 14(2)(f) suggests that works must include all of the points a through to h, rather than comprising any or all of the points. If this word is removed or changed to ‘or’ either ‘comprising’ or ‘including’ would be acceptable to this Council.	<p>Response to a)</p> <p>The Applicants confirm that the draft Development Consent Order (DCO) (REP5-010) was updated at Deadline 5 to use the word ‘comprising’ instead of ‘including’ at sub-paragraph (2). The Applicants therefore consider this point to be resolved.</p>

Reference	ExA Question	IP submission	Applicants' response
	<p>the later indicates that it is not a closed list?</p> <p>b) Referring to the definition of “mobilisation activities” in 14(6) can the applicants explain what is meant by “general preparation and site maintenance work”? Why does this need to be included as part of the mobilisation activities bearing in mind that, whilst it would not include the operation of heavy machinery or generators, it might still possibly lead to issues of noise and disturbance when occurring in proximity to residential receptors between 6.00am and 7.00am?</p> <p>c) For clarity, the ExA suggests adding similar wording from paragraph 1.6.1.6 of the outline Noise Management Plan [REP4-032] to this requirement.</p> <p>d) Can the applicants explain what is meant by “classes” in 6(b)?</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>b and e) -this Council would like to repeat its insistence (as per previous written and relevant reps (REP1-097 and RR-2027 respectively), and SoCG to date) that commencement of work at 6am poses an unacceptable risk to the amenity of residents in all Council areas. Standard construction hours conditions are acknowledged as generally being an 8am start, yet this proposes not only an early start, but an additional hour prior to that which will inevitably result in noise, activity and disturbance, in addition to 24hr non-emergency working which at point 14(4) provides for notification of the local authority, but does not mandate a specific or reasonable timescale for that notification.</p> <p>c) – no objection</p> <p>d) – applicants' response</p> <p>f) – no further comment</p>	<p>Response to b) and e)</p> <p>The Applicants set out their justification for these working hours in their response to the Examining Authority's Question 2:14.1.4 in REP5-130.</p>

Reference	ExA Question	IP submission	Applicants' response
	f) Do the local authorities have any outstanding comments on this requirement, including any suggested alternative drafting should any concerns remain		
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>	<p>a and c) – proposed wording appears sufficient. No other comments</p> <p>b) – FBC/applicants' response</p>	This is noted.
Q1.3.20	<p>Requirement 26 – Biodiversity Benefit</p> <p>The applicants explain in the Explanatory Memorandum [REP4-009] that this newly drafted requirement is</p>	<p>a) – wording is satisfactory</p> <p>b) – applicants' response</p>	This is noted.

Reference	ExA Question	IP submission	Applicants' response
	<p>being offered on a without prejudice basis subject to compulsory acquisition powers being 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>b) Can the applicants explain how the biodiversity benefits would be implemented for the proposed development and how this would be enforced?</p>		
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>	No further comments.	This is noted.
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>	This Council welcomes the grant of 10 weeks to discharge a requirement in whole or in part. Points 4(3) however of Schedule 12 which states that 'where the consultee requires further	The Applicants would note that the 10 day time period which is provided for in Schedule 12, 4(3) to the draft DCO (REP5-010) is not the time within which the consultee must provide a detailed response, but simply

Reference	ExA Question	IP submission	Applicants' response
		<p>information they must notify the discharging authority in writing specifying the further information required within 10 days of receipt of the consultation' is contrary to the standard 21-day allowance for review of discharging information. Resources in all organisations are at a critically low level, and it is very likely that regardless of this Order the suggested timescale would be unachievable. The same is true of point 4(5).</p> <p>Point 6(b) refers to refund of fees if not determined within eight weeks, and should be amended to ten weeks in line with point 3(1).</p> <p>This representation is submitted for, and on behalf of South Ribble Borough Council. Should you have any comments or questions please do not hesitate to contact us</p>	<p>the time within which they must notify the discharging authority as to whether they require any additional information in order that they can provide a full response. The Applicants maintain that this time period, and the time periods for a consultee response pursuant to Schedule 12, 5(1) and (2), are appropriate and necessary to ensure that the discharging authority has adequate time to consider any representations from consultees, to reach an informed view, and provide their approval (or refusal, as the case may be) within the ten week period prescribed in Schedule 12, 3(1) to the draft DCO.</p> <p>The Applicants note that in any event, Schedule 12 5(1) and (2) provide that a longer period may be agreed between the undertaker and the discharging authority, therefore if resourcing is an issue at the time of any required response, the consultee could request for a longer response period to be agreed.</p> <p>The Applicants note the point in relation to Schedule 12, paragraph 6(b) and confirm that the reference to 8 weeks has now been amended to align to the 10 week period in paragraph 3(1).</p>

Table 1.17: REP5-192 – South Ribble Borough Council (Response to ExQ2)

Reference	ExA Question	IP submission	Applicants' response
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 of each other,</p>	<p>As noted in the applicants' response to ExQ1.1.7 it is reasonable to expect flexibility to allow delivery of the projects independently where necessary. The applicants' commitment to post consent collaboration is also noted and</p>	<p>The Applicants would refer South Ribble Borough Council to the Applicants' Response to Examining Authority's Written Questions (ExQ2) – Question 2-1.1.1 (REP5-130) and Annex 5.2 to the Applicants response to Hearing Action Points: ISH1 6, 8, 9, 19, 26</p>

Reference	ExA Question	IP submission	Applicants' response
	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>welcomed, but other than a requirement to share proposal details and documents there is little obligation for joint working where there is no justification for this to be separate. The use of the term 'where possible' is an unacceptably loose and subjective commitment which appears to be governed by commercial sensitivities with little consideration of the impact that separate construction timescales would inevitably have on the residents and users of the various Council areas. ExQ1.1.7 states that 'the Applicants are unable to commit to further collaboration than already identified during construction' suggests that the applicant is already unwilling to work jointly. Arguably this unwillingness will continue unless both parties are mandated to do so.</p> <p>This Council requests that the Draft DCO is amended to mandate collaborative working unless circumstances which dictate otherwise are fully justified. These circumstances must take into account the effect that works will have on the residents of the relevant area, and should not wholly be based upon the needs, wants and commercial sensitivities of the applicants.</p>	<p>& 28 - Rev F01 (REP1-039) which provides details of why the Applicants cannot commit to concurrent construction.</p> <p>The Applicants would however like to reiterate that through Requirement 25 (Onshore Collaboration) of Schedules 2A and 2B of the draft DCO (C1/F09) and the commitment to the Construction Co-ordination Working Group outlined in the following management plans (Outline Code of Construction Practice, Outline Landscape Management Plan, Outline Ecological Management Plan, Outline Written Scheme of Investigation, and Outline Construction Traffic Management Plan) – there is an express willingness from both Applicants to collaborate.</p>
Q2:1.1.5	<p>Outline Communication Plan (OCP)</p> <p>An updated Outline Communications Plan has been submitted by the applicants at deadline 4 (D4) [REP4-029].</p> <p>a) Do the local authorities and parish councils have any comments and/or</p>	<p>a) – subject to agreement to the final Code of Construction Practice document mentioned within the OCP, the Council has no objection to this document. Although a number of measures to ensure public engagement have been removed from the previous version, these appear to have been accounted for in the main by paragraph 1.4.1.3 of the revised OCP. This Council would however prefer a timescale for</p>	<p>The Outline Communications Plan (OCP) has been updated at Deadline 6 (J1/F05) to include:</p> <p>A) Clarification that local residents will be kept informed of nearby construction works taking place (see bullet 2 of paragraph 1.5.1.3)</p>

Reference	ExA Question	IP submission	Applicants' response
	<p>additional suggestions on the drafting of this plan?</p> <p>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?</p> <p>c) Do the local authorities and parish councils consider that the creation of a local liaison committee should be retained in the outline plan?</p>	<p>advanced notification to be included in para 1.4.1.3 where it states that 'Occupiers of nearby properties will be informed in advance of the works taking place'. Late engagement proves no more beneficial to residents than no engagement at all, unless there are extenuating and emergency circumstances.</p> <p>b) – applicants' response only</p> <p>Point c) – Proposed development within South Ribble is significant but is in a semi-rural location where impact would be restricted to a limited number of residents. For this reason, the residents of South Ribble are felt to be suitably protected by proposed Para 1.4.1.3 subject to the comments made in point a). The residents of other relevant local authority areas however would in this Councils opinion benefit from a local liaison committee, and it is regrettable that the option has been removed from the draft OCP. South Ribble would welcome the chance to be represented at any local liaison committee to ensure collaborative working.</p> <p>Deletion of the sentence 'Agricultural Liaison Officer(s) will be appointed and will be the point of contact for landowners. The role is defined in the Outline CoCP (document reference J1)' however is more likely to affect the occupants of the Howick Cross Lane, Penwortham area where the majority of work south of the River Ribble is proposed, and which is predominantly agricultural in nature. This Council would suggest that reference to the same is added</p>	<p>B) The Applicants can confirm that the local liaison committee was re-added to the Outline Communications Plan at Deadline 5</p> <p>C) The Applicants would highlight that the reference to the Agricultural Liaison Officers as defined in the Outline Code of Construction Practice (CoCP) (J1/F05) has been added to Paragraph at 1.3.4 of the Outline Communications Plan.</p>

Reference	ExA Question	IP submission	Applicants' response
		back into the proposed changes for 1.4.1.3 for completeness, and to give surety to local residents/farmers who may be affected.	