



MORGAN AND MORECAMBE OFFSHORE WIND FARMS: TRANSMISSION ASSETS

The Applicants' response to Hearing Action Points from ISH4 and CAH3



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Glossary

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

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

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

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

Acronyms

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

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

Units

Unit	Description
%	Percentage
dB	Decibels
Kg	Kilogram
kHz	Kilohertz

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

1 The Applicants' response to Hearing Action Points from ISH4 and CAH3

1.1 Introduction

- 1.1.1.1 This document addresses the Hearing Action Points raised by the Examining Authority at Issue Specific Hearing 4 on 7 October 2025 and 8 October 2025 and Compulsory Acquisition Hearing 3 on 9 October 2025 due at Deadline 6.

1.2 The Applicants' Response to Hearing Action Points of ISH4 and CAH3

Table 1.1: Applicants response to Hearing Action Points of ISH4 and CAH3

HAP No.	For whom	Deadline	Hearing Action Point (HAP)	Applicants' response
Agenda item 1 – Introductions, arrangements and purpose of the hearing				
ISH4_1	Fylde Borough Council (FBC)	ASAP to enable the Applicants to respond by Deadline 6	Provide the full statement, as read out during the hearing, as to where FBC suggest the Environmental Statement is not complete and where the mitigation hierarchy has not been followed. Including where FBC has already made these points in written representations, including detail on specific areas where the ES is claimed to be insufficient.	Fylde Borough Council provided a statement to the Applicants on Monday 20 th September. Given the lack of time to consider in advance of Deadline 6 the Applicants will respond at Deadline 7.
Agenda item 3 – Noise				
ISH4_2	Fylde Borough Council	Deadline 6	Confirm that the statement of common ground submitted on 6 October includes confirmation that the updates to the NVMP at D5 address the Council's concerns around noise sensitive receptors. Further to this, FBC is to confirm wording of CoT79 is satisfactory.	
ISH4_3	Applicants	Deadline 6	Review the wording of CoT80 in the Commitments Register in light of the revisions to Requirement 18.	The Applicants have updated the wording of CoT80 to account for the revisions to Requirement 18 of the draft DCO (REP5-010) and included this within Volume 1, Annex 5.3: commitments register (F1.5.3/F07) at Deadline 6.
Agenda item 4 - Landscape and visual matters				
ISH4_4	Applicants	Deadline 6	Review the duration of replacement landscape planting in light of FBC's request for a rolling 10 year period.	The Applicants refer to their response to ISH4_30 regarding the duration of replacement landscape planting.

HAP No.	For whom	Deadline	Hearing Action Point (HAP)	Applicants' response
ISH4_5	Fylde Borough Council	Prior to Deadline 6	Confirm the determination status of the Bluefield Solar project close to the Morecambe substation site.	<p>The Applicants can confirm that Fylde Borough Council provided the Applicants with an update regarding Bluefield Solar Project and Clifton Marsh Solar Farm on Wednesday 15th October.</p> <p>The update received stated that the case officer for Bluefield Solar Project cannot confirm the committee referral date at this time due to outstanding consultee responses. For Clifton Marsh Solar Farm application there is an outstanding objection from United Utilities which is currently being resolved and the application is likely to be sent to the December planning committee subject to the outstanding objection being resolved.</p> <p>The Applicants can therefore confirm that these updates do not alter the conclusions of the CEA submitted by the Applicants, including the potential cumulative impacts on landscape and visual resources in accordance with the Applicants' cumulative assessment methodology and approach, as set out in Volume 1: Chapter 5: Environmental Assessment Methodology. The Applicants' position is based on the understanding that no material changes have been made to the proposed developments as part of the update received from Fylde Borough Council.</p>
Agenda item 5- Transportation and traffic				
ISH4_6	Applicants	Deadline 6	Set out the rationale for the construction access strategy (including the number of accesses and how those can / will be shared) and the outline construction traffic management plan measures proposed for shared accesses.	<p>The Applicants are jointly seeking a single consent for the Morgan Offshore Wind Project and the Morecambe Offshore Windfarm Transmission Assets comprising aligned onshore export cable corridors to separate onshore substations, and from these substations an aligned onward connection to the National Grid substation at Penwortham. Accordingly, where there is space to safely provide two accesses, separate accesses are proposed to meet the independent construction requirements of each discrete project.</p> <p>The Applicants note that of the 63 proposed points of access/crossings proposed for the construction phase of the Transmission Assets (shown on the Access to Works Plan (B11/F03), two thirds (42 accesses) are provided as separate construction</p>

HAP No.	For whom	Deadline	Hearing Action Point (HAP)	Applicants' response
				<p>accesses with the rest being shared. These separate accesses are either assigned to Morgan (with a MG notation or Morecambe with an MC notation in the Access to Works Plan (B11/F03)). There are also six points of access where two points of access are provided to the cable corridor for either Morgan or Morecambe but at this stage the accesses have not yet been assigned to a single project so both have rights of over the accesses, these are TAT_MGMC_6, 16, 17, 59, 60 and 63.</p> <p>The remaining one third of the accesses (21 points of access) are at locations where due to the existing environment (e.g. proximity of buildings, junctions, etc) there is not space to safely provide two separate accesses and as such sharing of access has been necessary. These accesses are TAT_MGMC_1, 2, 3, 4, 5, 7, 8, 9A, 9B, 33, 42, 43, 48, 49, 52, 53, 55, 56, 58, 61 and 62 (shown on the Access to Works Plan (B11/F03)).</p> <p>The Applicants reiterate the points made to the ExA at IHS4 regarding the requirement for separate accesses where it is safe to do so, notably that in line with the requirements of the Construction (Design and Management) Regulations 2015 (CDM), one Contractor has to take overall responsibility for safety at a site (as the Principal Contractor). The assigned Principal Contractor (either Morgan or Morecambe) would therefore need to ensure that the second project's contractor (either Morgan or Morecambe) aligns their working practices to ensure safety. Such solutions introduce risk from a safety perspective and could also have an impact upon the efficient and timely delivery of the projects due to the setup between two independently appointed contractors and the risks associated with liabilities between contractors</p> <p>The Applicants acknowledge that there have been concerns raised regarding the need for separate accesses from Ballam Road and Saltcotes Road (by the landowner in this location) but note that no other concerns have been raised by IPs for other points of access. With regard to the accesses on Ballam Road, the Applicants can confirm any rights sought over the most northern construction access</p>

HAP No.	For whom	Deadline	Hearing Action Point (HAP)	Applicants' response
				<p>in this location TAT_MGMC_16 have been removed which is illustrated in the Land Plans (B10/F05) and the Works Plans (B8/F04).</p> <p>In relation to Saltcotes Road, the Applicants confirm that negotiations are ongoing with the affected landowner and consider that an appropriate and satisfactory solution can be reached via voluntary agreement between the parties.</p> <p>With regard to the outline Construction Traffic Management Plan (oCTMP) measures proposed for shared accesses the Applicants would reiterate that following a series of workshops with Lancashire County Council (LCC) highways that the design of all accesses and crossings have been agreed in principle (subject to minor revisions to the outline Highways Access Management Plan (oHAMP) submitted at Deadline 6 (J8/F05).</p> <p>The oCTMP (J8/F06) also outlines measures to manage construction traffic to ensure the use of the correct routes and accesses. Notably, section 1.4.1 of the oCTMP outlines measures including the provision of delivery instructions to drivers, and the use of local direction signing to direct construction traffic to the respective accesses. The Applicants would note that the delivery instructions will show the driver the routes and access location and notation and that this access notation will then be displayed on signage at the local level to ensure the use of the correct access. For example, the sign could say "Morgan Access 60" with an appropriate direction arrow.</p> <p>The Applicants would highlight that the final strategy would need to be agreed with LCC as part of developing the final detailed CTMP(s) and HAMP(s) which are secured by Requirement 9 and 10 of the draft DCO (C1/F07) respectively.</p>
Agenda item 7 – Onshore ecology/biodiversity				
ISH4_7	Applicants	Deadline 6	Provide a plan displaying the project order limits overlayed on the new Natural England peat plan.	The Applicants have overlaid the Transmission Assets Order Limits onto the new Natural England Peat plan. This is included in Annex 2.1 to Applicants response to HAP ISH4_7: Natural England Peat Plan (S_D6_6.1).

HAP No.	For whom	Deadline	Hearing Action Point (HAP)	Applicants' response
ISH4_8	Applicants	Deadline 6	Update the Soil Management Plan to provide a peat mitigation hierarchy.	The Applicants have updated the outline soil management plan (J1.7/F04) to include a peat mitigation hierarchy. This has been submitted at Deadline 6.
ISH4_9	Applicants and Fylde Borough Council	Deadline 6	Engage and provide an updated position and/or updated documentation regarding the sand lizard mitigation.	The sand lizard mitigation plan (S_D4_14/F03) has been updated in line with FBC's comments and has been submitted at Deadline 6. In addition, the Applicants have provided a direct response to FBC's comments in 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) (see S_D6_2.5).
ISH4_10	Applicants	Deadline 6	Review and update where necessary the oWHMP, oLMP, oEMP, oBBP, oCoCP and ODMP to ensure they align effectively as they relate to the commitments within the outline wildlife hazard management plan.	<p>The Applicants confirm that the following outline management plans have been updated at Deadline 6 to explain how they align with the principles within the Outline Wildlife Hazard Management Plan (S_D3_8) and the process of discharge will be co-ordinated:</p> <ul style="list-style-type: none"> • Outline Code of Construction Management Plan (J1) • Outline Landscape Management Plan (J2) • Outline Ecological Management Plan (J6) • Outline Operational Drainage Management Plan (J10) • Outline Biodiversity Benefit Management Plan (J11)
Agenda item 6- Socio-economic and land use				
ISH4_11	Applicants	Deadline 6	Provide the applicants' position on compliance with Paragraphs 5.13.2 to 5.13.6 of National Policy Statement (NPS) EN-1.	<p>Paragraph 5.13.2 of NPS EN-1 requires that "Where the project is likely to have socio-economic impacts at local <u>or</u> regional levels, the applicant should undertake and include in their application an assessment of <u>these impacts</u> as part of the ES (see Section 4.2)" (emphasis added). Paragraphs 5.13.3 - 5.13.6 detail the advised scope of any such assessment.</p> <p>In accordance with paragraph 5.13.2 of NPS EN-1 the Applicants undertook an assessment of potential socio-economic effects (including tourism) at a regional level within section 2.11 and 2.12 of ES Volume 4, Chapter 2: Socio-economics (document reference F4.2).</p>

HAP No.	For whom	Deadline	Hearing Action Point (HAP)	Applicants' response
				<p>Prior to this, the Applicants had published a Preliminary Environmental Information Report (PEIR) as part of the statutory consultation, which included an assessment of potential socio-economic effects (including tourism) at the regional level.</p> <p>As part of this statutory consultation for the Transmission Assets, no responses were received from local authorities or other stakeholders on the matter of the spatial scale at which potential tourism effects had been assessed, or any other comments to suggest that there was concern regarding the Transmission Assets' potential to have a likely significant effect on tourism at a local level.</p> <p>Subsequently, the full Environmental Statement submitted as part of the DCO application was accepted for examination by the Planning Inspectorate.</p> <p>The Applicants' position is that the approach taken within ES Volume 4, Chapter 2: Socio-economics (document reference F4.2) is further supported by the Examining Authority's Report of Findings and Conclusions with respect to the Mona Offshore Wind Farm, published on 4 July 2025. The assessment of potential socio-economic effects (including tourism) associated with the Mona Offshore Wind Farm included both offshore and onshore effects. The consideration of potential onshore effects associated with that project's transmission assets makes it a relevant example to cite. The onshore grid connection point for the Mona Offshore Wind Farm is located just 80 miles from the onshore grid connection point for the Transmission Assets, reinforcing the relevance of that project's recommendation.</p> <p>The Mona Offshore Wind Farm application followed a comparable approach to assessing onshore socio-economics (and tourism) effects at a regional level, and the Examining Authority concluded in paragraph 6.4.53 of their findings they were "...satisfied that the Applicant's assessment has fully addressed the potential socio-economic effects associated with the construction, operation and decommissioning of the Proposed Development in accordance with Section 5.13 of NPS EN-1."</p>

HAP No.	For whom	Deadline	Hearing Action Point (HAP)	Applicants' response
				<p>However, as part of the DCO examination for the Transmission Assets, some local planning authorities have made comments in relation to the spatial scale at which potential effects on tourism have been assessed within ES Volume 4, Chapter 2: Socio-economics (document reference F4.2), pursuant to paragraph 5.13.2 of NPS EN-1.</p> <p>Section 4.2 of NPS EN-1 is cross-referenced by 5.13.2. Paragraph 4.2.4 requires that "To consider the potential effects, including benefits, of a proposal for a project, the applicant must set out information on the <u>likely significant</u> environmental, social and economic effects of the development, and show how any <u>likely significant</u> negative effects would be avoided, reduced, mitigated or compensated for, following the mitigation hierarchy. This information could include matters such as employment, equality, biodiversity net gain, community cohesion, health and well-being." (emphasis added).</p> <p>There is no wider evidence available to suggest the construction and/or operation of onshore infrastructure associated with offshore wind development is <u>likely</u> to have <u>significant</u> effects on local tourism. Fylde Borough Council and Blackpool Borough Council were requested by the Examining Authority to "Provide evidence of where projects of this kind have had an impact on the tourism economy" via Hearing Action Point 53 under Agenda Item 6(i) of the Issue Specific Hearing 1. No such evidence has been provided to substantiate each Council's position on the matter.</p> <p>There is also no statutory guidance available to direct the identification of appropriate socio-economic study areas, including for the assessment of potential tourism effects.</p> <p>The Applicants maintain that Paragraph 5.13.2 (and therefore 5.13.3 - 5.13.6) of NPS EN-1 was complied with, on the basis that an assessment would only be required as part of the application where it was considered prior to the application stage that the project would be <u>likely</u> to have <u>significant</u> socio-economic effects (including tourism) at a local level – there was no evidence (either from the Applicants' own assessments, or as part of any submission from the local planning</p>

HAP No.	For whom	Deadline	Hearing Action Point (HAP)	Applicants' response
				<p>authorities in response to the statutory consultation or other pre-application engagement) at or prior to the application stage that such an impact would be likely, therefore no assessment was required or undertaken at application stage.</p> <p>Notwithstanding and without prejudice to the above, further to concerns being raised during the examination process, the Applicants have undertaken a Local Tourism Assessment which can be found at document reference (S_D5_8). Potential effects on tourism at a local level are assessed as not significant. This supports the findings of ES Volume 4, Chapter 2: Socio-economics (document reference F4.2), which assessed no significant effects on tourism at a regional level.</p> <p>The Applicants have gone so far as to implement updates to outline management plans to take account of potential local impacts which have been assessed as not significant in the context of the local tourism economy as a whole, in order to provide further assurances to the local planning authorities around future engagement. Updated outline management plans include the Outline Construction Traffic Management Plan (document reference J5/F05), which mitigates potential traffic and transport-related effects on major events, and the Outline Communications Plan (document reference J1.1/F05) which mitigates potential effects on individual tourism businesses, including accommodation and hospitality providers. In addition to this, the Applicants have repeatedly confirmed that they have no intention and no powers to close Starr Gate/Squires Gate which appears to be the sole issue for Blackpool Borough Council. The Applicants note that the the Applicants and Blackpool Borough Council have been able to make significant progress in relation to Starr Gate since Issue Specific Hearing 4. Although this matter remains 'not agreed' within row BBC.SE.7 of the Statement of Common Ground (S_D3_6.2/F04) submitted at Deadline 6, the Applicants consider that a further update will likely be provided by the Applicants and Blackpool Borough Council at Deadline 7 to confirm agreement on this matter as indicated in the Statement of Common Ground (S_D3_6.2/F04).</p>

HAP No.	For whom	Deadline	Hearing Action Point (HAP)	Applicants' response
				The Applicants maintain that the Examining Authority and local planning authorities have therefore been provided with sufficient information to inform their consideration of potential effects on tourism, and any planned mitigations via existing outline management plans, in a manner that is fully compliant with NPS EN-1 section 5.13.
ISH4_12	Applicants	Deadline 6	Revise Requirement 19 to refer to Fylde Borough Council as discharging authority.	The Applicants have updated Requirement 19 of Schedules 2A and 2B of the draft DCO (C1/F09) submitted at Deadline 6 to refer to Fylde Borough Council as the discharging authority.
ISH4_13	Applicants, Fylde Borough Council and Blackpool Borough Council	ASAP prior to Deadline 6 to ensure the Applicants can respond to this for Deadline 6	FBC and BBC to provide additional comments on the local tourism assessment (REP5-142) so applicants can make any necessary amends for Deadline 6.	Following receipt of additional comments by FBC on 3 October and by BBC on 7 October, the Applicants have updated section 1.2.3 and Appendices B and C of the Local Tourism Assessment at Deadline 6 (S_D5_8/F02).
Agenda item 8- Aviation				
ISH4_14	Applicants	Deadline 6	Review and update, if necessary, the outline wildlife hazard management plan regarding paragraphs 1.1.4.5 and 1.1.4.8 on the decision making and trigger level process and durations for responding to exceedance to make clear this will be agreed in consultation with stakeholders.	The Applicants have updated Appendix A: Draft Wildlife Habitats Attractants Risk Assessment (of the Outline Wildlife Habitat Management Plan (S_D3_8)) at Deadline 6 to clarify the decision-making process regarding trigger levels and the escalation of management measures as part of the adaptive management process.
ISH4_15	BAE and the Applicants	Deadline 6	Ensure the SoCG addresses NPS policy compliance and specify the level of impact BAE consider would result if BAE consider there is an 'unacceptable impact' in policy terms.	The Applicants have included new rows in the joint SoCG between BAE Systems and the DIO as they relate to NPS policy compliance. The Applicants, BAE and DIO positions have stated whether there is an 'unacceptable impact' in policy terms (noting BAE's previous response at Deadline 5 (REP5-161) relating to 'unacceptable risk'). The SoCG has been submitted at Deadline 6 (S_D1_6.12/F02).
Agenda item 9 – draft Development Consent Order				

HAP No.	For whom	Deadline	Hearing Action Point (HAP)	Applicants' response
ISH4_16	Applicants	Deadline 6	Review the reference to 'undertaker' at article 6(9) and 6(10).	The Applicants have reviewed the drafting in article 6(9) and 6(10) in view of the ExA's comments made at the hearing and agree that reference to 'undertaker' can be removed from those paragraphs. As a matter of interpretation, the Applicants accept that following a transfer of benefit by Morgan or Morecambe the definition in Article 2 for 'undertaker' would read as if the name of the transferee were included instead of either Morgan or Morecambe as appropriate. It is therefore not strictly necessary for Articles 6(9) and 6(10)) to include references to 'undertaker' as well as to 'Morgan' and 'Morecambe' respectively. The Applicants had previously considered it would be clearer to include 'undertaker' in these paragraphs as well as 'Morgan' and 'Morecambe' respectively as the term 'undertaker' is used frequently throughout the draft DCO and this would reiterate that wherever that term is used it must be read in the context of the transfer of benefit if one has taken place. However, upon review, the Applicants accept that this is not strictly necessary and so have made the requested amendments in Article 6 of the Deadline 6 draft DCO (C1/F09).
ISH4_17	Lancashire County Council and Blackpool Borough Council	Prior to Deadline 6 to ensure the Applicants can respond to this for Deadline 6	Confirm if the councils have any outstanding comments on article 10.	The Applicants have not received any further comments on article 10 ahead of Deadline 6 from Blackpool Borough Council. Lancashire County Council provided some comments on article 10 during the afternoon of Friday, 17 th October 2025. The Applicants are considering these comments but do not currently consider that any drafting updates are required to article 10. They will however continue to discuss Lancashire County Council's comments with them and will provide an update at deadline 7 as appropriate.
ISH4_18	Applicants	Deadline 6	Review the drafting of article 12(2) and (4) concerning the mechanisms for achieving the 'reasonable satisfaction of the local planning authority'. Inform BBC and FBC of any updates.	The Applicants have deleted the words ' <i>to the reasonable satisfaction of the relevant planning authority</i> ' from article 12(2) and 12(4) in the Deadline 6 draft DCO (C1/F09). Upon further review the Applicants do not consider this wording is necessary. The Applicants note that article 12 requires a diversion to be put in place which accords with the standard defined in the relevant public rights of way management plan which must be approved and delivered under requirement 8 of Schedule 2A or 2B. The required standard will therefore be approved under that requirement. Requirement 8 also then requires the code of

HAP No.	For whom	Deadline	Hearing Action Point (HAP)	Applicants' response
				construction practice (COCP) (and therefore the public rights of way management plan as part of the COCP for the relevant stage) to be followed. The approval process and standard against which the relevant planning authority can enforce in the event the diversion were not delivered to that standard are already secured by requirement 8 of Schedules 2A and 2B of the draft DCO (C1/F09).
ISH4_19	Applicants	Deadline 6	Review and update where necessary the drafting of article 14 to ensure there are appropriate links to Requirement 10.	The Applicants have amended Article 14 to ensure that all accesses are subject to the controls contained within Requirement 10. The amendments are included in the Deadline 6 draft DCO (C1/F09).
ISH4_20	Applicants	Deadline 6	Review whether the applicants can increase the timescales for notice in respect of temporary possession in article 29.	The Applicants have amended Article 29(3) of the draft DCO (C1/F09) to provide for 40 days' notice rather than the well-precedented 28 days to acknowledge concerns raised during ISH4 around the potential added complexities for landowners given the draft DCO would authorise two separate projects.
ISH4_21	Applicants	Deadline 6	Review article 30(12) to ensure the maintenance period aligns with the maintenance timescales for ecology and landscape mitigation.	The Applicants have reviewed article 30(12) and have amended the drafting to provide for the ability to use temporary possession powers for maintenance purposes to a 10 year maintenance period for trees, hedges and shrubs and a 5 year period for any other part of the authorised project. These amendments align to clarifications and updates made to the outline landscape management plan at Deadline 6 in response to comments made by Fylde Borough Council at Deadline 5 (REP5-171) and comments made at ISH4. The outline landscape management plan (J2/F05) provides for a 10 year maintenance period for trees, hedgerows and shrubs (planted outside the site of each onshore substation). A 10 year period within which to exercise temporary possession powers for maintenance, which is limited to the maintenance of trees, hedgerows and shrubs within each project's cable corridor, where each project may not otherwise have permanent rights or freehold land, is considered reasonable and proportionate to ensure appropriate mitigation measures are implemented. The amendments to this article are based on article 26

HAP No.	For whom	Deadline	Hearing Action Point (HAP)	Applicants' response
				of the Sheringham Shoal and Dudgeon Extensions Offshore Wind Farm Order 2024.
ISH4_22	Applicants	Deadline 6	Update paragraph 1.5.1.1 of the Arboricultural Method Statement to identify the trees that will be protected and retained.	The Applicants have updated the outline Arboriculture Method Statement (S_D5_10/F02) to identify the trees that will be protected and retained. This has been submitted at Deadline 6.
ISH4_23	Fylde Borough Council	ASAP prior to Deadline 6 to ensure the Applicants can respond to this for Deadline 6	Provide comments on the outline Arboricultural Method Statement and any proposed alternative drafting for Articles 35 and 36 to the Applicants.	<p>The Applicants can confirm that comments were received from Fylde Borough Council (FBC) on Wednesday 15th October. The comments received from FBC included a concern that Articles 35 and 36 grant blanket powers to remove hedgerows and trees without sufficient safeguards and that these powers should be constrained by certified plans, approved arboricultural impact assessments (AIA), Tree Protection Plans and hedgerow assessment under the Hedgerows Regulations 1997.</p> <p>The Applicants can confirm that in response to the feedback received from FBC they have updated Articles 35 and 36 in the draft DCO (C1/F09) to include cross referencing of the Outline Arboriculture Method Statement and Outline Ecological Management Plan to ensure that the safeguards referenced within these plans are adhered to.</p>
ISH4_24	Applicants	Prior to Deadline 6 to enable Fylde Borough Council to respond by Deadline 6	Review the drafting of articles 35 and 36 in respect of how they link to Requirement 6 and share any updated drafting with Fylde Borough Council.	Further to comments made and discussions at ISH4, the Applicants have updated the drafting of articles 35 and 36 of the draft DCO (C1/F09) to link them to the controls and processes for tree and hedgerow works (including removal) which are contained within the outline Arboriculture Method Statement (S_D5_10/F02) and the outline ecological management plan (J6/F06). This drafting was shared with Fylde Borough Council on 18 October 2025.
ISH4_25	Applicants	Deadline 6	Review and confirm if any updates are required to article 47(1) in respect of comments made by Newton with Clifton and Freckleton Parish Council and the Examining Authority (ExA).	The Applicants have reviewed the drafting of article 47 (Inconsistent planning permissions).

HAP No.	For whom	Deadline	Hearing Action Point (HAP)	Applicants' response
				<p>The Applicants agree that article 47(1)(b) should also start with the word 'not' as suggested by the Examining Authority at ISH4. The Applicants have made this update in the draft DCO (C1/F09) submitted at Deadline 6.</p> <p>The Applicants have also considered whether any additional drafting should be added to the end of article 47(1) to confirm that implementation of the order can continue after a 'slot in' planning permission has been implemented as suggested by Newton with Clifton and Freckleton Parish Council. The Applicants consider that this element of the drafting is generally already covered under Article 47(3) which states that where planning permissions are granted and then implemented, they do not prevent the carrying out or use of the authorised project nor do they prevent the exercise of any other power or right under the Order. However, for added clarity, the Applicants have added some additional wording to Article 47(3) the draft DCO (C1/F09) to address the point raised by NCFPC.</p>
ISH4_26	Fylde Borough Council	ASAP prior to the next scheduled meeting with the Applicants on 15 October	Provide details to the applicants of their justification for a request of 5 years for implementation, not 7 years, in respect of specific impacts, such as health.	<p>The Applicants can confirm that FBC referred the Applicants to their answer to Q1:3.1 in its Answers to the Examining Authorities Written Questions (REP5-171).</p> <p>Therefore, the Applicants would refer to Annex 2.3 the Applicants' Response to Deadline 5 submissions from Statutory Consultees and other organisation: Fylde Borough Council (S_D6_2.3) where a full response is provided.</p>
ISH4_27	BAE, DIO (a and b) and the Applicants (a only)	<p>a) The parties next meeting prior to Deadline 6</p> <p>b) In advance of</p>	a) BAE, DIO and the Applicants to discuss drafting relating to aviation lighting and whether this is secured through Requirement 4 or a separate requirement, and	a) The Applicants have continued discussions with BAE and the DIO in respect of appropriate updates to Requirement 4 and also Requirement 5 and have subsequently agreed wording with BAE and DIO in relation to those requirements which is included in the draft DCO (C1/F09) submitted at Deadline 6. The updated drafting remains subject to BAE and DIO reviewing related updates to the outline Code of Construction Practice (J1/F05) which have been made at Deadline

HAP No.	For whom	Deadline	Hearing Action Point (HAP)	Applicants' response
		the parties' next meeting	b) in the event, drafting is not agreed, any alternative drafting must be submitted into the Examination.	<p>6; but the Applicants expect BAE and DIO to be able to confirm this for Deadline 7.</p> <p>The updated drafting remains subject to BAE and DIO reviewing related updates to the outline Wildlife Hazard Management Plan (S_D3_8/F03) which have also been made at Deadline 6; but the Applicants expect BAE and DIO to be able to confirm this for Deadline 7.</p> <p>The Applicants have also shared and agreed this updated drafting with BAOL and BAOL is included as a consultee for requirement 4(1)(i) in the same way as BAE and DIO.</p> <p>b) As noted above, the Applicants consider that this drafting is agreed with the aviation stakeholders.</p>
ISH4_28	Applicants	Deadline 6	Consider adding 'external appearance' to Requirement 4(e).	The Applicants have updated Requirement 4 of Schedules 2A and 2B of the draft DCO (C1/F09) submitted at Deadline 6.
ISH4_29	Applicants	Deadline 6	Update Figure 15 the Outline Design Principles to add spot heights along the Freckleton Bridleway (Public Right of Way) to provide a reference point in relation to the onshore substation Above Ordnance Datum heights as secured in Requirement 5.	The Applicants have incorporated the identified bridleway as requested, appending a full-size copy to this document (Appendix A) and including a copy within the Outline Design Principles (J3/F03) document, which has also been submitted at Deadline 6.
ISH4_30	Fylde Borough Council	ASAP to ensure the Applicants can respond to this for Deadline 6	Provide alternative drafting concerning Requirement 6.	<p>The Applicants can confirm that FBC referred the Applicants to their answer to Q1:3.7 in its Answers to the Examining Authorities Written Questions (REP5-171).</p> <p>Therefore, the Applicants would refer to Annex 2.3 the Applicants' Response to Deadline 5 submissions from Statutory Consultees and other organisation: Fylde Borough Council (S_D6_2.3) where a full response is provided.</p>
ISH4_31	Applicants	Deadline 6	Review and update, where necessary, the wording of the outline Landscape Management Plan to ensure this takes account of any trees	The Applicants have updated the wording of the outline Landscape Management Plan (J2/F05) to take account of the trees that are to be

HAP No.	For whom	Deadline	Hearing Action Point (HAP)	Applicants' response
			retained as part of the Arboricultural Method Statement.	protected and retained, as set out in the outline Arboriculture Method Statement (S_D5_10/F02).
ISH4_32	Lancashire County Council, Blackpool Borough Council (and the Applicants)	Deadline 6	Confirm satisfaction with the wording of Requirement 10 and engage with the applicants on this prior to Deadline 6 where necessary.	Lancashire County Council provided some comments on article 10 during the afternoon of Friday, 17 th October 2025. The Applicants are considering these comments but do not currently consider that any drafting updates are required to requirement 10. They will however continue to discuss Lancashire County Council's comments with them and will provide an update at deadline 7 as appropriate.
ISH4_33	Fylde Borough Council and any other Councils	Deadline 6	Provide to the Examining Authority any alternative drafting in relation to construction working hours (Requirement 14).	
ISH4_34	Applicants	Deadline 6	Consider whether any update is required to the outline Construction Traffic Management Plan in relation to timescales for restoration of highway land.	<p>The Applicants would highlight that paragraph 1.9.1.2 of the outline Construction Traffic Management Plan (oCTMP) (REP5-066) and paragraph 1.4.3.4 of the outline Highways Access Management Plan (oHAMP) (REP5a-036) include commitments to the removal of accesses (unless they are permanent means of access) and restoration of the land as soon as practicable and in any event no longer than 12 months following the completion of the relevant stage of onshore works unless otherwise agreed with the highway authority in consultation with the relevant planning authority/authorities.</p> <p>With regard to offsite highway mitigation measures, section 1.10.2 of the oCTMP (REP5-066) outlines that all works would be temporary and following completion of construction would be reinstated to their former state unless agreed otherwise with Lancashire County Council.</p> <p>These commitments to the removal of accesses and offsite highway works and restoration of highway land are retained within the updated oHAMP (J8/F05) and oCTMP (J5/F06) submitted at Deadline 6 which are secured by Requirement 9 and 10 of the draft DCO (C1/F07) respectively.</p>

HAP No.	For whom	Deadline	Hearing Action Point (HAP)	Applicants' response
				<p>The Applicants have also included additional text within section 1.13.3 of the oCTMP at Deadline 6 (J5/F06) in regard to the remediation of highway condition, this states: <i>"The timescales for agreeing and implementing the remediation strategy would be discussed and agreed with the relevant highway authority prior to the commencement of construction and would be detailed within the final detailed CTMP(s)"</i>.</p> <p>The Applicants would assert that based upon these clarifications and this minor update that there is no requirement for any further updates to the oCTMP.</p>
ISH4_35	Applicants and Fylde Borough Council	Deadline 6	Engage with Fylde Borough Council on Requirement 16 and provide an update on these discussions to the ExA.	<p>The Applicants can confirm that they have engaged with Fylde Borough Council on the matters raised in their Deadline 5 submission (see REP5-171) in regards to Requirement 16. The Applicants' response to the points raised by FBC were shared on 4th October and can be found within 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) (S_D6_2.3). Both parties have agreed that this is a point of disagreement.</p>
ISH4_36	All Councils	ASAP prior to Deadline 6 to ensure the Applicants can respond to this for Deadline 6	Provide any comments to the applicants on Requirement 25 and the updates to the CoCP and other management plans regarding the Construction Coordination Working Group.	<p>The Applicants can confirm that FBC provided comments regarding the Construction Coordination Working Group (CCWG) to the Applicants on Wednesday 15th October.</p> <p>The comments received requested that clarification should be added to explain how the membership of the CCWG will be kept up to date and a request for text to be added to ensure that there is a mechanism for adding and removing members upon creation of the CCWG. The other point raised by FBC was requesting the addition of wording to be added in regard to the purpose of how and when the Applicants will respond to matters raised by the working group.</p> <p>The Applicants welcomed the clarification requests from FBC can confirm that the Construction Coordination Working Group section has been amended in the following outline plans.</p> <ul style="list-style-type: none"> • Outline Code of Construction Practice (J1/F05) • Outline Construction Traffic Management Plan (J5/F05)

HAP No.	For whom	Deadline	Hearing Action Point (HAP)	Applicants' response
				<ul style="list-style-type: none"> Outline Ecological Management Plan (J6/F06) Outline Landscape Management Plan (J2/F05) Outline Written Scheme of Investigation (J9/F05)
ISH4_37	Applicants	ASAP	Provide the proposed updated drafting of Requirement 26 (Biodiversity Benefit) and corresponding updates to articles 20 and 22 to the Examining Authority.	The Applicants provided this to the Examining Authority on 8 October 2025. The drafting updates have now been incorporated into the draft DCO (C1/F09) submitted at Deadline 6.
ISH4_38	All Councils	ASAP prior to Deadline 6 to ensure the Applicants can respond to this for Deadline 6	Provide comments to the applicants on the proposed updated Requirement 26 drafting to the Applicants.	<p>The Applicants can confirm that Fylde Borough Council provided comments regarding Biodiversity Benefit on Wednesday 15th October to the Applicants.</p> <p>The comments received from FBC focused around only providing biodiversity benefit for permanent above ground infrastructure and a query regarding what the 10% net gain would be based upon.</p> <p>The Applicants reiterate that biodiversity benefit is not a mandatory requirement and the earliest date that BNG requirements are to apply to Nationally Significant Infrastructure Projects is May 2026.</p> <p>It is the Applicants' view that their voluntary commitment to achieve an overall biodiversity benefit for areas of permanent habitat loss associated with the permanent above ground infrastructure of the Transmission Assets fulfils the requirements set out in the Fylde Local Plan. The Applicants can confirm that the baseline of habitat losses is calculated on the permanent habitat loss associated with Work Nos 23A/B and 21A/B.</p>
ISH4_39	Applicants, BAE, DIO and MoD	Deadline 6	a) Applicants, BAE and DIO/MoD to discuss BAE and DIO/MoD proposed amendments to Requirement 27 (regarding the wildlife hazard management plan).	(a) & (b) The Applicants have continued discussions with BAE and the DIO in respect of the precise drafting of Requirement 27 and have subsequently agreed wording with BAE and DIO which is included in the draft DCO (C1/F09) submitted at Deadline 6. The updated drafting remains subject to BAE and DIO reviewing related updates to the outline Wildlife Hazard Management Plan (S_D3_8/F03) which have also been made at Deadline 6; but the Applicants expect BAE

HAP No.	For whom	Deadline	Hearing Action Point (HAP)	Applicants' response
			b) If changes to the current drafting of R.27 are agreed, the applicants must share and agree those with Blackpool Airport. c) The applicants will share any updates to drafting with Fylde Borough Council.	and DIO to be able to confirm this for Deadline 7. The Applicants have also shared and agreed this updated drafting with BAOL. c) The Applicants have shared this drafting with FBC and note that it is also included in the draft DCO (C1/F09).
ISH4_40	The Applicants (a and b) and FBC (a only)	a) Prior to Deadline 6 b) Deadline 6	a) Applicants and FBC to discuss and agree the proposed drafting for Requirement 28 - the s106 Grampion condition and submit into Examination as soon as possible. b) Applicants to submit a note setting out how the drafting meets the relevant tests and planning practice guidance on Grampion conditions into Examination at Deadline 6.	a) The Applicants shared their proposed draft Grampian style Requirement 28 wording relating to the s106 agreement with FBC on Wednesday, 15 October and received feedback from FBC on Monday, 20 October. The Applicants thank FBC for their engagement so far. The Applicants have sought to incorporate elements of FBC's feedback into the drafting of Requirement 28. However, Fylde Borough Council has stated (on Monday 20th October) they are not currently in a position to confirm agreement to the wording. In any case and as set out further in (b) below, the Applicants consider it is appropriate to provide the Examining Authority with the wording for a draft Requirement which secures the delivery of appropriate mitigation in respect of the impacts identified at Blackpool Road Recreation Ground as a result of the works to install cables at that location. The suggested wording for this Requirement 28 is in square brackets in the Deadline 6 draft DCO (C1/F09). The Requirement provides certainty that the appropriate mitigation will be in place before works in that location can commence. As explained in the Explanatory Memorandum (C3/F08), this has been included on a 'without prejudice' basis as the Applicants' intention is to enter into the s106 agreement as a priority, ideally before the Secretary of State makes their decision. In the event agreement is reached prior to the Secretary of State's decision, Requirement 28 would no longer be required. With regards to progress on the s106 Agreement more generally, the Applicants would highlight that a meeting was held with the Council on

HAP No.	For whom	Deadline	Hearing Action Point (HAP)	Applicants' response
				<p>6 October, further to the Council's instructed solicitors first making contact with the solicitors for the Applicants on 1 October. As stated during ISH4, this meeting was productive and it was understood by the Applicants that many key points between the parties were agreed, notwithstanding all parties took away actions, including for the Council to provide further evidence of figures put forward in order for the drafting of the s106 agreement to be further progressed. The matters agreed at that meeting have supported further drafting updates to the s106 agreement. Now that engagement with the Council has significantly increased, the Applicants are working hard to progress negotiations in accordance with the timescales and pressures noted during ISH4.</p> <p>b) The Applicants consider that the drafting of the Grampian style s106 Requirement accords with the tests set out in s122 of the Community Infrastructure Levy Regulations 2010 and the Government's guidance on 'Use of Planning Conditions' (the Guidance). Paragraph 9 of the Guidance confirms that whilst conditions requiring works on land that is not controlled by the applicant, or that require the consent or authorisation of another person or body often fail the tests of reasonableness and enforceability, a Grampian condition can achieve a similar result. The proposed wording is, as set out in the guidance, drafted in a negative form and prohibits development in the relevant Work Nos. areas identified until a specified action has been taken, namely, entering into a section 106 agreement to mitigate the impacts identified to the Blackpool Road Recreation Ground.</p> <p>Given the nature of the mitigation involved amounts to financial contributions to St Anne's Football Club during the construction works at Blackpool Road Recreation Ground, this cannot be secured through a management plan or through a positively worded requirement. The appropriate mechanism is to enter into a s106 agreement and, as it has not been possible to finalise this during examination the</p>

HAP No.	For whom	Deadline	Hearing Action Point (HAP)	Applicants' response
				<p>Applicants' commitment to mitigation is appropriate to be secured through the Grampian style requirement proposed. In so far as 'exceptional circumstances' are needed for such a requirement, the Applicants consider the statutory timeframes for the DCO examination and decision (which cannot be delayed to accommodate the Council's negotiating timescales) and the fact the requirement is being offered by the Applicants to more than justify its inclusion.</p> <p>Paragraph 10 requires that in such cases, the 6 tests are met. These are the tests as set out by section 122 of the Community Infrastructure Levy Regulations 2010. The Applicants set out below how the six tests are met:</p> <p>1. Necessary.</p> <p>REP1-041 provides a summary of the impacts on Blackpool Road Recreation Ground from the Transmission Assets and references to the relevant sections of the Environmental Statement which identified the need for a s106 agreement to mitigate the temporary effects on use of the Recreation Ground. As a s106 agreement has not yet been entered into, it is necessary to secure an obligation on the Applicants to enter into such agreement, in order for the necessary mitigation to be secured. As set out above, the nature of the mitigation being secured means this cannot be secured in a management plan or through a positively worded requirement.</p> <p>2. Relevant to planning and relevant to the development to be permitted.</p> <p>The drafting of the condition relates only to the Works Nos. where the works at Blackpool Road Recreation Ground are permitted and to the mitigation it is necessary to deliver flowing from the relevant works.</p> <p>3. Enforceable – the relevant planning authority for Blackpool Road Recreation Ground is Fylde Borough Council and they are also a party to the s106. FBC would be able to take</p>

HAP No.	For whom	Deadline	Hearing Action Point (HAP)	Applicants' response
				<p>enforcement action under the Planning Act 2008 if the Applicants were to undertake works within the identified works areas without entering into the s106 as to do so would be a breach of the DCO (if consented with the requirement included).</p> <p>4. Precise- the requirement relates to specific work numbers which relate to the works permitted to be carried out by each of Project A and Project B. The requirement specifies the Act under which the agreement must be made and the impacts it must relate to in terms of what the agreement should mitigate. The drafting is clear in terms of what is needed and what it is seeking to achieve.</p> <p>5. Reasonable in all other respects – the Applicants maintain that inclusion of the Grampian style requirement is reasonable to include whilst the s106 remains under negotiation for all the reasons set out above.</p>
ISH4_41	Fylde Borough Council	In advance of Deadline 6	Provide to the applicants specific drafting it requires for the fees paragraphs in Schedule 12.	The Applicants can confirm they shared with Fylde Borough Council an updated Schedule 12 to align with the Heckington Fen Order 2025 on 18 th October and the Applicants can confirm they have updated Schedule 12 of the draft DCO (C1/F09) to include drafting based on the Heckington Fen Solar Park Oder 2025 as requested by Fylde Borough Council.
ISH4_42	Applicants and Fylde Borough Council	In advance of Deadline 6	Engage regarding the fees paragraphs in Schedule 12 and seek to agree the drafting.	
Agenda item 11- Control and management documents				
ISH4_43	Newton with Clifton and Freckleton Parish Councils	ASAP and in advance of Deadline 6 to enable the Applicants to update the Outline	Provide the comments made during the hearing in writing with regards to the outline communications plan for the Applicants to consider.	The Applicants are grateful to Newton and Clifton and Freckleton Parish Councils for their feedback to the Outline Communications Plan, which were subsequently shared with the Applicants following the hearing on the 8 October 2025. The Applicants have reviewed the feedback, and where appropriate, have been made updates to the Outline Communications Plan for Deadline 6 (J1.1/F05).

HAP No.	For whom	Deadline	Hearing Action Point (HAP)	Applicants' response
		Communications Plan prior to Deadline 6		
ISH4_44	Fylde Borough Council	ASAP and in advance of Deadline 6 to enable the Applicants to update any documents where required prior to Deadline 6	Provide any further comments on outstanding documents to the applicants.	<p>The Applicants can confirm that Fylde Borough Council provided the following comments to the Applicants regarding management plans:</p> <ul style="list-style-type: none"> • Biodiversity Benefit Statement – please refer to ISH4_39 and also how there is no explicit 30-year HMMP requirement or monitoring triggers in the dDCO • Outline Ecological Management Plan does not include an enforceable 10-year minimum, annual reporting or rolling replanting resented in the dDCO • Arboriculture Method Statement: needs to be elevated to a detailed AMS under Requirement 8 with supervision and tree protection plans. • Project Description: throughout the document it refers to all work/exit pits being placed 100m from the SSSI boundary, it implies that this has been done for mitigation of the SSSI. Although in some documents that have acknowledged this doesn't reflect the actual extent of dune system, the reality is the work areas will actually be c50-60m away from the toe of the dunes. This will increase pressure on the dunes in a number of ways including increasing disruption to the dunes from works but also pushing pedestrians into the embryo dunes who are avoiding the works area. Cumulative working areas of the exit pits is huge, this will have an impact on avian species feeding on the ebb tide in that area, as previously said the mitigation area at Fairhaven is not suitable substitute for feeding areas. • Outline Landfall Construction Method Statement – FBC would request clarity and more information on the proposed temporary construction exclusion zone. When and for what

HAP No.	For whom	Deadline	Hearing Action Point (HAP)	Applicants' response
				<p>time periods as this will affect coastal patrols and access to the dunes for blow out management</p> <ul style="list-style-type: none"> Outline Communications Plan – FBC welcome the updated document but request the following additions, whether in the document or as commitments for the detailed documents. Details of the Project's key communication messages and tone, how effectiveness will be monitored and reviewed, protocols for unplanned incidents or complaints escalation and considerations around accessibility and inclusion. <p>Below sets out how the Applicants have responded to the individual points raised by FBC:</p> <p>Biodiversity Benefit Statement and metric - the Applicants would highlight that the Biodiversity Benefit Statement has been updated to an Outline Biodiversity Management Plan (J11/F06) at Deadline 6. Section 1.8 of the Outline Biodiversity Management Plan states that detailed timetables for habitat creation and enhancement of the biodiversity benefit areas, and long-term management and monitoring, would be provided in the detailed Biodiversity Benefits Management Plan(s).</p> <p>Arboriculture Method Statement - The Applicants have committed to implementation of detailed AMS(s) under Requirement 8 of the draft DCO (REP5a-018). The detailed AMS(s) will contain Tree Protection Plans. This is set out in the Outline Arboriculture Method Statement submitted at Deadline 6 (S_D5_10/F02).</p> <p>Project Description - As outlined in the Landfall Method Statement, there will never be six exit pits located at the beach at the same time, as only one Applicant will carry out construction works at any given time (as set out in section 3.10.2 and section 3.14.5.15 of Volume 1, Chapter 3: Project description (document reference: F1.3)). In addition, the Applicants and Natural England have agreed the following statement and therefore can confirm that the mitigation proposed is appropriate. <i>The Applicants and Natural England can confirm that the parties met on 16 September to discuss the potential</i></p>

HAP No.	For whom	Deadline	Hearing Action Point (HAP)	Applicants' response
				<p><i>impacts on the passage features of the Ribble and Alt Estuaries SPA/Ramsar site. Following on from the meeting, the Applicants and Natural England have agreed that subject to the Applicants submitting further information into Examination at Deadline 5, which were discussed during the meeting and over email, Adverse Effect on Integrity on the Ribble and Alt Estuaries SPA and Ramsar sites can be ruled out, due to the adoption of mitigation measures at the landfall location for the passage periods. The mitigation measures included for the passage period include screening around the compounds on Lytham St Annes beach and employment of an Ecological Clerks of Work who will be on site during landfall construction operations. It is agreed that the Fairhaven Saltmarsh is an alleviation measure which will reduce ongoing recreational disturbance, reducing existing pressures on ornithological features of the SPA and Ramsar sites, including those species which may be affected by the works in the intertidal.</i></p> <p>Outline Landfall Construction Method Statement: During drilling activities, access between the exit pits and the sand dunes may be temporarily managed (but not blocked) for up to two weeks per exit pit. This is to maintain public safety while the trenchless technique machines are working below the surface of the beach. Detail about public access to the beach during the construction phase is further detailed in Appendix A, of the Outline Public Rights of Way (PRoW) Management Plan (Document reference J1.5). Therefore the Applicants can confirm that the coastal patrols and the access to the dunes for blow out management will not be affected.</p> <p>Outline Communications Plan: The Applicants can confirm that the Outline Communication Plan has been updated at Deadline 6 in response to the comments received, which includes a complaints procedure.</p>
ISH4_45	Applicants	Deadline 6	Consider and explain the application and interaction of Green Belt status within the CNP Infrastructure policy framework.	The Applicants outlined their position in relation to Critical National Priority Infrastructure (CNPI) in their Green Belt Technical Note submitted at Deadline 4 (REP4-092). Matters relating to CNPI were

HAP No.	For whom	Deadline	Hearing Action Point (HAP)	Applicants' response
				<p>also explored in ISH 4 and reference should be made to the Applicants' ISH4 Hearing Summary (see S_D6_13).</p> <p>By reference to paragraph 4.2.5 of EN-1, para 1.7.1.2 of the Green Belt TN confirms that the Morgan and Morecambe projects constitute low carbon CNPI and in the SoCG agreed with Fyle Borough Council (FBC) on Green Belt matters (see S_D1_6.3/F04), they agree the projects also comprise CNPI.</p> <p>The Applicants note that the CNPI provision is intended to support projects that have followed appropriate planning and environmental processes and does not override those processes. The Applicants do not consider that the CNPI test replaces the planning balance but rather provides additional weight to the need for the Transmission Assets where appropriate in carrying out the planning balance (see para 4.2.8 of EN-1). The Secretary of State (SoS) is entitled to consider the application as a whole and the Applicants do not consider the CNPI provision as introducing a new separate or elevated test.</p> <p>Para 1.7.1.3 and 4 of the Green Belt TN, set out the position and interaction in relation to Green Belt and CNPI. NPS EN-1 confirms that the SoS will <i>'take as the starting point for decision-making that such infrastructure is to be treated as if it has met any tests which are set out in the NPPs, or any other planning policy which requires a clear outweighing of harm, exceptionality or very special circumstances'</i>. (EN-para 4.2.16). This includes the <i>'starting point that the Green Belt test of very special circumstances to justify development'</i> defined in NPPF para 153, is met (EN-1 para 4.2.17). This presumption therefore means that <i>'the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations'</i>.</p> <p>In policy terms the Applicants consider that the Green Belt test of very special circumstances (VSC) is met for the Transmission Assets as a result of their necessity in delivering almost 2GW of new offshore wind</p>

HAP No.	For whom	Deadline	Hearing Action Point (HAP)	Applicants' response
				<p>capacity from the Morgan and Morecambe Generation Assets for which the NPS identifies an urgent need [para 3.2.6 of EN-1] to which substantial weight should be given [in accordance with para 3.2.7 of EN-1] even without the 'added weight' of CNPI. These VSC are outlined in the GB TN section 1.7.2. and apply whether the test in the NPPF or the NPS is applied. The extent of VSC required to outweigh any harm relates to consideration of both harm due to inappropriateness and other harms.</p> <p>The mitigation hierarchy relates to the consideration of 'other harms' resulting from the Transmission Asset's location within areas of Green Belt, and not the harm relating to inappropriateness. All chapters of the ES (including those relevant to 'other harms') set out the mitigation hierarchy that has been applied (through embedded, primary and tertiary measures) to avoid, minimise and mitigate environmental effects (whether significant or not).). The application of the mitigation hierarchy is set out in section 1.1.2.5 of REP 5-130 and all relevant mitigation is captured in the Commitments Register (F1.5.3).</p> <p>The Applicants have in sections 1.3 – 1.5 of the Green Belt TN demonstrated how the mitigation hierarchy – avoidance and minimisation of impacts have been undertaken as part of the site selection process. The Applicants also reiterate that the site selection process does not require demonstration that no alternative site exists outside of the Green Belt (see para 1.7.3.6 of the Green Belt TN and REP3-070) .</p> <p>The mitigation of impacts has also been demonstrated through the embedded mitigation in the design of the Transmission Assets, expressed in relation to landscape and visual matters for substation design in particular, in the oDP section 5. This design is to be further developed post consent, through the defined process described in section 6 of the oDP. FBC have confirmed in SoCG on Green Belt matters that mitigation hierarchy has been demonstrated.</p>

HAP No.	For whom	Deadline	Hearing Action Point (HAP)	Applicants' response
				<p>The ExA have previously sought clarification on the scope of the mitigation hierarchy applied under EN-1, referencing the Applicants' response to ExQ2:1.1.6 (REP5-130) which suggested that it applies only to significant adverse effects. The ExA noted that paragraph 4.2.5 of EN-1 refers to "all residual effects," and queried whether the Applicants' interpretation was too narrow.</p> <p>In response, the Applicants explained that the document submitted in response to the Examining Authority's second written questions - Annex 5.2 to Applicants response to ExQ2 1.1.7: Mitigation Hierarchy (REP5-132) - focused on residual significant effects. The Applicants submitted that this was consistent with the Environmental Impact Assessment (EIA) process, which is designed to identify and assess likely significant environmental effects.</p> <p>The Applicants acknowledged that the policy does not explicitly limit the mitigation hierarchy to significant effects, but consider that requiring further mitigation or compensation for negligible or minor impacts would not be proportionate. They noted that such impacts are often a natural consequence of development and submitted demonstrating mitigation for every minimal effect would not align with the intention of the EIA process or the policy framework. As set out above, all chapters of the ES (including those relevant to 'other harms') set out the mitigation hierarchy that has been applied (through embedded, primary and tertiary measures) to avoid, minimise and mitigate environmental effects (whether significant or not). The application of the mitigation hierarchy is set out in section 1.1.2.5 of REP 5-130 and all relevant mitigation is captured in the Commitments Register (F1.5.3). This clearly demonstrates how the mitigation hierarchy has been applied by the Applicants to each and every topic area.</p> <p>In relation to significant effects, the Applicants referred to landscape and visual impacts associated with the substations, confirming that mitigation had been applied to address this element of other harm. They acknowledged a difference of opinion between parties (FBC)</p>

HAP No.	For whom	Deadline	Hearing Action Point (HAP)	Applicants' response
				regarding the effectiveness of the landscape mitigation at the substations which is recorded in the FBC SoCG. It is now noted however that FBC are, in principle, content with the post consent design development process, as discussed in recent SoCG meetings, and the Applicants' commitment to develop the proposals to align with the Project Level Design Principles and Design Code to deliver mitigation embedded in the detailed design submitted to discharge the relevant requirements. The Applicant expect this to be recorded in the SoCG submitted for Deadline 7.

1.3 Applicants Response to CAH3 Hearing Action Points due at Deadline 6

Table 1.2: Applicants responses to CAH3 Hearing Action Points due at Deadline 6

HAP No.	For whom	Deadline	Hearing Action Point (HAP)	Applicants' response
Agenda item 4 – Applicants' update on negotiations with affected persons (APs)				
CAH3_1	Fylde Borough Council (FBC) and the applicants	a) ASAP in advance of deadline 6 b) Deadline 6	a) Engage regarding FBC ownership of the Fairhaven Salt Marsh (plots 19-001 and 19-002) and plots 02-001, 02-002, 02- 013, 02-014 and 02-015. b) FBC to submit evidence of this ownership to the examination.	The Applicants confirm that Fylde Borough Council are the registered freehold owners of plots 19-001 and 19-002 under the land registry titles LAN256720 and LAN256701, which is reflected in the Book of Reference (D3/F05).
CAH3_2	Applicants	Deadline 6	Review and consider if it is necessary to update the Book of Reference category for occupiers in the Land Rights Tracker.	The Land Rights Tracker (S_D1_15/F06) has been updated to reflect that the Tenants and Leaseholders are Category 1 interests which aligns with the Book of Reference (D3/F05).

HAP No.	For whom	Deadline	Hearing Action Point (HAP)	Applicants' response
Agenda item 5 – Representations by affected persons				
CAH3_3	Applicants and Blackpool Borough Council	Deadline 6	Engage further on Starr Gate access. Each party to put in submissions on the final position on Starr Gate and any other compulsory acquisition matters (including the applicants' response to the further legal opinion from Douglas Edwards KC as submitted at deadline 5).	<p>The Applicants and Blackpool Borough Council discussed Starr Gate during statement of common ground meetings on 15 October 2025 and 21 October 2025 and also at a separate land meeting on 21 October 2025. The Applicants and Blackpool Borough Council have been able to make significant progress in relation to Starr Gate. Although this matter remains 'not agreed' within row BBC.DCO.1 of the Statement of Common Ground (S_D3_6.2/F04) submitted at Deadline 6, the Applicants consider that a further update will likely be provided by the Applicants and Blackpool Borough Council at Deadline 7 to confirm agreement on this matter as indicated in the Statement of Common Ground (S_D3_6.2/F04).</p> <p>Blackpool Borough Council have this week confirmed to the Applicants that they have very recently resolved to adopt additional land at Starr Gate as public highway and that the Council will submit confirmation on this into the Examination at Deadline 6. The Applicants have, however, agreed with the Council that they would update the Book of Reference, Land Plan-Onshore and the drafting in Article 29 to reflect this very recent purported adoption of additional land at Starr Gate up to, but not including, the slipway. The adopted highway plots at Starr Gate now comprise plots 02-007i, 02-008, 02-008i, 02-009, 02-010, 02-011 and 02-012 on the Land Plan _ Onshore (B10/F05). The Applicants updated Article 29 in the draft DCO (C1/F09) therefore includes a restriction on the projects exercising temporary possession powers over all those plots on the basis that they are adopted public highway. The Applicants have also agreed at a land meeting which took place on 21 October 2025 to provide separate Heads of Terms for Starr Gate and are taking into account recent comments from Blackpool Borough Council with a view to trying to swiftly conclude this element of the land negotiations. The Applicants remain committed to seeking to resolve matters with</p>

HAP No.	For whom	Deadline	Hearing Action Point (HAP)	Applicants' response
				<p>Blackpool Borough Council through the negotiation, and entry into, of a voluntary agreement for Starr Gate.</p> <p>Notwithstanding the above, given the submission of the Further Advice from Douglas Edward's KC by Blackpool Borough Council at Deadline 5 (REP5-164), the Applicants have set out a detailed response to the legal points raised to clarify the Applicant's final position on those matters in relation to those land plots at Starr Gate which remain private land (being plots plots 02-007 and 02-008ii as shown on the Land Plan – Onshore (B10/F05). This is included as Annex 6.1 to this response (S_D6_6.2). This response should be read alongside the Applicants deadline 5 response to Blackpool Borough Council (REP5-127).</p>
CAH3_4	Blackpool Borough Council	Deadline 6	Submit the Heads of Terms and details of meetings with Blackpool Airport	<p>Communication has been ongoing between the Applicant's appointed agent, the land interest, and their agent via email, focusing on the HoTs and key matters including cable depth and land sterilisation. A meeting was held between the Applicants' agent and the Airport's agent on the 02 October 2025 to continue discussions on the key points of difference between the parties, mainly 1. Cable Restrictions in the Solar Farm 2. Protective Provisions 3. Use of CA Powers 4. Assignment 5. Planning objections.</p> <p>A further positive teams meeting has been held on 21st October 2025 between the parties to continue discussion. A way forward has been agreed on a number of plots and revised HOTs are to be issued imminently. A regular cadence of meetings is being set up with a view to holding engineering workshops to move outstanding matters forward and reach voluntary agreements as swiftly as possible.</p>
CAH3_5	Applicants	ASAP and in any event by Deadline 6	Engage with the occupier of land holding number 26 regarding the phase 2 assessment. Seek consent to provide evidence to the examination regarding impacts and mitigations on business loss to that occupier.	Agreement has been reached to submit a redacted version of the Stage 1 Report referred to in Compulsory Acquisition Hearing 3 and the Stage 2 Report. These are included in S_D6_8 Farm Business Assessments.

HAP No.	For whom	Deadline	Hearing Action Point (HAP)	Applicants' response
CAH3_6	Applicants	Deadline 6	Consider the suggested drafting from the Examining Authority to link the time period for commencement with the decision on the Morecambe Generation Assets application.	<p>The Applicants have considered the drafting of requirement 1 of Schedules 2A and 2B and article 21 further. The Applicants have made amendments to requirement 1 of Schedules 2A and 2B of the draft DCO (C1/F09) at Deadline 6 to align the time limits for Project A (the Morgan transmission assets) with the time limit included in the Morgan Offshore Wind Project Generation Order 2025 (Morgan Generation Order). The Applicants have made the same amendment for Project B (the Morecambe transmission assets), noting that the application for the Morecambe Offshore Windfarm Generation Assets Order (Morecambe Generation Order) remains subject to decision and therefore the date of the Morecambe Generation Order has been left blank in the drafting updates. As set out in the Explanatory Memorandum submitted at Deadline 6 (C3/F08), a decision on the Morecambe Generation Assets is due on 18 December 2025 and, in the event it is granted, the date of the Order and SI number will simply need to be added by the Secretary of State to reflect that.</p> <p>The Applicants have also deleted the existing paragraph (2) from requirement 1 of Schedules 2A and 2B of the draft DCO (C1/F09) so that the wording that provided for an additional year for any judicial review has now been removed to align with the Morgan Generation Order.</p> <p>Further, the Applicants have aligned the drafting of Article 21 (Time limit for exercise of authority to acquire land compulsorily) of the draft DCO (C1/F09) to reflect amendments made to requirement 1 in Schedules 2A and 2B.</p>
CAH3_7	Applicants	Deadline 6	Present an update regarding discussions on the temporary and permanent accesses at land plots 08-074b, 08-073 and 08-070b.	<p>The Applicants are still in ongoing discussions with the neighbouring landowner regarding an alternative operational access. Once the alternative is secured the Applicant can give an undertaking not to exercise the powers contained in the order.</p> <p>Temporary access is sought on plots 08-074b and 08-070b for construction access to the onshore cable corridor. This flexibility is required to ensure appropriate, fit for purpose, installation of</p>

HAP No.	For whom	Deadline	Hearing Action Point (HAP)	Applicants' response
				<p>construction access can be delivered. At the time of construction, if possible, the Applicants will design the access point to avoid encroachment onto the residential property curtilage and have updated the voluntary agreement with the neighbouring landowner to stipulate the Applicants will engage on the matter prior to construction.</p> <p>Lancashire County Council (LCC) highways have confirmed that the design of all accesses are agreed in principle (subject to minor revisions to the outline Highways Access Management Plan (oHAMP) submitted at Deadline 6(J8/F05). The Applicants would note that the current agreed design of access A28 in the oHAMP does not illustrate the physical footprint of the access design encroaching on to plot 08-070b.</p>
Agenda item 9 – Crown Land – section 135 PA2008				
CAH3_8	The Applicants	Deadline 6	Update the examination on the progress of each projects' Agreement for Lease with the Crown Estate.	<p>The Applicants are each in advanced discussions with TCE to finalise their Transmission Agreements for Lease for the Morgan and Morecambe Projects. Due to the unique situation and close proximity of the two Projects, the Applicants have been collaboratively working with TCE to establish suitable wording to clarify licensing and consenting between Projects for overlapping offshore survey works. This is now agreed in principle, and it is the Applicants' understanding that no outstanding issues remain and the Transmission Agreements for Lease can be finalised. If necessary an update can be provided to the Secretary of State.</p>
Agenda item 11 – Corporate structure of the applicants				
CAH3_9	The Applicants	Deadline 6	Provide an update regarding the Morecambe OWL financial position to provide satisfaction that Morecambe OWL would be able to pay any blight	<p>At Annex 6.3 to Applicants response to HAP CAH3_9: Morecambe OWL financial position (S_D6_6.3), the Morecambe Applicant has provided a letter confirming that should funding be required then CI V have committed to provide it.</p>

HAP No.	For whom	Deadline	Hearing Action Point (HAP)	Applicants' response
			claims that may be made in advance of commencement of construction.	

Appendix A

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- LEGEND
- Extent of the development platform for the onshore substation site
 - Extent of indicative earthwork grading
 - Existing minor contour (1m interval)
 - Existing major contour (5m interval)
 - Proposed minor contour (1m interval)
 - Proposed major contour (5m interval)
 - Spot heights
 - Indicative location of proposed attenuation feature

C	Public Right of Way spot heights added	NA	15/10/25
B	Plan updated	NA	15/09/25
A	Finalisation of plan following client comments	NA	04/07/25
REV.	DESCRIPTION	APP.	DATE

LDA DESIGN

PROJECT TITLE
Morgan and Morecombe Offshore
Wind Farm: Transmission Assets

DRAWING TITLE
Figure 1: Topographic Context

ISSUED BY	Oxford	T: 01865 887 050	
DATE	04/07/25	DRAWN	DK
SCALE@A1	1:5,000	CHECKED	NA
STATUS	Final	APPROVED	AK

DWG. NO 9445_SK002

No dimensions are to be scaled from this drawing.
All dimensions are to be checked on site.
Area measurements for indicative purposes only.

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Sources Ordnance Survey