

MORGAN AND MORECAMBE OFFSHORE WIND FARMS: TRANSMISSION ASSETS

Lancashire County Council SoCG



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Glossary

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

Acronyms

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

1 Initial Statement of Common Ground between Morgan and Morecambe Offshore Wind Farms: Transmission Assets and Lancashire County Council

1.1 Introduction

1.1.1 Overview

1.1.1.1 This Statement of Common Ground (SoCG) has been prepared between Morgan Offshore Wind Limited and Morecambe Offshore Windfarm Ltd (hereafter referred to as ‘the Applicants’) and Lancashire County Council together the parties. The SoCG sets out the areas of agreement and disagreement between the parties in relation to the proposed Development Consent Order (DCO) application for the Morgan and Morecambe Offshore Wind Farms: Transmission Assets (hereafter referred to as ‘the Transmission Assets’).

1.1.1.2 The need for a SoCG between the Applicants and Lancashire County Council is set out in section 1 of Appendix F of the Rule 6 letter issued by the Planning Inspectorate on 28 March 2025.

1.1.1.3 This document is intended to provide the Examining Authority (ExA) with an overview of the level of common ground between the parties. The SoCG will identify where agreement has been reached, where differences lie and the reasons for disagreement or outstanding matters. The SoCG will also specify the actions needed to address the issues and will facilitate further discussion between the parties. The SoCG will be updated during the Transmission Assets Examination and submitted at the Deadlines indicated in the Rule 6 letter.

1.1.2 Transmission Assets elements under Lancashire County Council’s remit

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

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

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

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

-
- Landscape and Visual Resources
 - Land Use and Recreation;
 - Historic Environment
 - Traffic and Transport
 - DCO.

1.1.3 Overview of Transmission Assets

- 1.1.3.1 The design philosophy for the Transmission Assets is for the Morgan Offshore Wind Project: Generation Assets and the Morecambe Offshore Windfarm: Generation Assets (referred to as ‘the Generation Assets’) to be electrically independent. Therefore, each offshore wind farm will have its own separate set of transmission assets (e.g., cable and substation infrastructure). However, the location of the infrastructure will be aligned (where practicable), for example within aligned offshore and onshore cable corridors to minimise impacts to environment and the community.
- 1.1.3.2 Morgan OWL and Morecambe OWL (the Applicants), are jointly seeking a single consent for their electrically separate transmission assets comprising aligned offshore export cable corridors to landfall and aligned onshore export cable corridors to separate onshore substations (and associated infrastructure), and onward connection to the National Grid at Penwortham, Lancashire.
- 1.1.3.3 The key components of the Transmission Assets include the following.
- Offshore elements:
 - offshore export cables: these export cables will bring the electricity generated by the Generation Assets to the landfall for onward transmission.
 - Landfall:
 - landfall site: this is where the offshore export cables are jointed to the onshore export cables via the transition joint bays. This term applies to the entire area between Mean Low Water Springs and the transition joint bays.
 - Onshore elements:
 - onshore export cables: these export cables will be jointed to the offshore export cables via the transition joint bays at the landfall site, and will bring the electricity generated by the Generation Assets to the onshore substations;
 - onshore substations: the two electrically separate onshore substations will contain the components for transforming the power supplied via the onshore export cables up to 400 kV;
 - 400 kV grid connection cables: these export cables will bring the electricity generated by the Generation Assets from the two electrically

separate onshore substations to the existing National Grid substation at Penwortham;

- environmental mitigation areas: temporary and/or permanent areas, including accesses identified to provide environmental mitigation only; and
- biodiversity benefit areas: temporary and/or permanent areas, including accesses identified to provide biodiversity benefit only.

1.1.4 Approach to SoCG

1.1.4.1 This initial SoCG has been developed during the pre-examination phase and will be progressed during the examination phases of the Transmission Assets. In accordance with discussions between the parties, the SoCG is focused on those issues raised by Lancashire County Council within its response to [insert e.g. Scoping, Section 42 consultation and as raised through the [insert EWG if applicable] that has underpinned the pre-application consultation between the parties. This SoCG also includes those issues raised by Lancashire County Council during the post-application phase (i.e. relevant representations and pre-examination meetings).

1.1.4.2 The structure of this SoCG is as follows:

- Section 1.1: Introduction
- Section 1.2: Summary of SoCG
- Section 1.3: Summary of consultation
- Section 1.4: Agreement log.

1.2 Summary of SoCG

1.2.1 Overview

1.2.1.1 This SoCG outlines the consultation that has taken place between the parties during the pre-application and post-application phase of the Transmission Assets. The agreement logs present the position reached on 22 October (Deadline 6).

1.2.2 Summary of those matters agreed, ongoing points of discussion and not agreed

1.2.2.1 Table 1.1 provides a summary of those matters agreed, an ongoing point of discussion or not agreed between the parties.

Table 1.1: Summary of those matters agreed, ongoing points of discussion and not agreed

Topic	Agreement status
Hydrology and Flood Risk	Agreed
Onshore Ecology and Nature Conservation	Some matters agreed, some matters not agreed

Topic	Agreement status
Green Belt and Separation	Ongoing point of discussion
Landscape and Visual Resources	Some matters agreed, some matters not agreed
Land Use and Recreation	Some matters agreed, some matters under discussion
Historic Environment	Some matters agreed, some matters under discussion
Traffic and Transport	Ongoing point of discussion
DCO	Some matters agreed, some matters under discussion

1.3 Summary of Consultation

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

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

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

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

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

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

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

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

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

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

1.4 Agreement log

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

Table 1.4: Position definitions and colour coding

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

1.4.2 Hydrology and Flood Risk

Table 1.5: Agreement Log between the parties on Hydrology and Flood Risk

Reference Number	Discussion point	Applicants' position	Lancashire County Council LLFA position	Status
LCC.HFR.1	Consultation	The Applicant has undertaken adequate consultation with LCC on the potential impacts of the Transmission Assets on hydrology and flood risk	The LLFA agrees that adequate consultation on the potential impacts of the Transmission Assets on hydrology and flood risk has been undertaken.	Agreed
LCC.HFR.2	Consultation	The Application documents have had due regard to matters raised by LCC through statutory and non-statutory consultation on hydrology and flood risk.	The LLFA agrees that application documents have had due regard to matters raised by LCC through statutory and non-statutory consultation on hydrology and flood risk.	Agreed
LCC.HFR.3	Policy and planning	The Application documents have identified and considered the most up-to-date plans and policies at the point of submission as relevant to hydrology and flood risk, within LCC's remit. Subsequently the new National Standards for SuDS (19 June 2025) has been published.	The LLFA agrees documents have identified and considered the most up-to-date plans and policies as relevant to hydrology and flood risk, within LCC's remit	Agreed
LCC.HFR.4	Surveys	Agreement that desk -based information is adequate to characterise the hydrology and flood risk baseline and that site-specific surveys will be undertaken as necessary at detailed design	<p>In the development of the DCO, the LLFA agrees that desk -based information is adequate to characterise the hydrology and flood risk baseline and that site-specific surveys are not required at this level.</p> <p>However, the LLFA will require more details to be provided at a later detailed design stage for example in the Detailed Code of Construction Practice and the Detailed Operational Drainage Management Plan and for ordinary watercourse consent</p>	Agreed

Reference Number	Discussion point	Applicants' position	Lancashire County Council LLFA position	Status
			<p>applications made under the Protective Provisions for the Lead Local Flood Authority. For this, site specific surveys are expected to be required.</p> <p>The LLFA notes that, as a result of the publication of the New National SuDS Standards (19 June 2025) that the detailed design of SuDS associated with all aspects of the development will need to be revisited and designed in accordance with these new standards. This can be reflected at detailed design stage.</p>	
LCC.HFR.5	Surveys	Sufficient data has been collated to appropriately characterise the hydrology and flood risk baseline environment for the purposes of Environmental Impact Assessment (EIA) within Volume 3, Chapter 2: Hydrology and Flood Risk (APP-070).	The LLFA agrees that Sufficient data has been collated to appropriately characterise the hydrology and flood risk baseline environment for the purposes of Environmental Impact Assessment (EIA) within Volume 3, Chapter 2: Hydrology and Flood Risk (APP-070).	Agreed
LCC.HFR.6	Baseline environment	The hydrology and flood risk baseline has been appropriately characterised in Volume 3, Chapter 2: Hydrology and Flood Risk (APP-070).	The LLFA agrees that the hydrology and flood risk baseline has been appropriately characterised in Volume 3, Chapter 2: Hydrology and Flood Risk (APP-070).	Agreed
LCC.HFR.7	Study area	The hydrology and flood risk study area is appropriate for the impacts and the receptors assessed.	The LLFA agrees that the hydrology and flood risk study area is appropriate for the impacts and the receptors assessed.	Agreed
LCC.HFR.8	Assessment methodology	The sensitivity and significance of the hydrology and flood risk receptors have been appropriately and	The LLFA agrees that the sensitivity and significance of the hydrology and flood risk receptors have been appropriately and	Agreed

Reference Number	Discussion point	Applicants' position	Lancashire County Council LLFA position	Status
		adequately described within Volume 3, Chapter 2: Hydrology and Flood Risk (APP-070).	adequately described within Volume 3, Chapter 2: Hydrology and Flood Risk (APP-070).	
LCC.HFR.9	Assessment methodology	The methodologies used within Volume 3, Chapter 2: Hydrology and Flood Risk (APP-070) are appropriate for assessing the potential impacts of the Transmission Assets	The LLFA agrees that the methodologies used within Volume 3, Chapter 2: Hydrology and Flood Risk (APP-070) are appropriate for assessing the potential impacts of the Transmission Assets	Agreed
LCC.HFR.10	Assessment of the effects from the project alone	No significant residual effects on hydrology and flood risk are predicted to arise from the development of the Transmission Assets with the mitigation measures in place including the implementation of the Detailed Operational Drainage Management Plan and Detailed Code of Construction Practice	Based on the evidence submitted to date, the LLFA agrees that there is likely to be no significant residual effects on hydrology and flood risk are predicted to arise from the development of the Transmission Assets. The LLFA expects that any identified risks will be assessed and mitigated through the Detailed Operational Drainage Management Plan and Detailed Code of Construction Practice, as well as through relevant consents and permits required.	Agreed
LCC.HFR.11	Assessment of the effects from the project cumulatively with other projects	No significant adverse effects on hydrology and flood risk are predicted to arise from the development of the Transmission Assets cumulatively with other projects and plans at the point of application. This will be reviewed prior to construction stage.	The LLFA is not aware of any conflicts with other plans and projects.	Agreed
LCC.HFR.12	Mitigation	The mitigation measures outlined in Volume 3, Chapter 2: Hydrology and Flood Risk (APP-070) are appropriate and will ensure significant effects are avoided, appropriately monitored and	Based on the evidence submitted to date, the LLFA agrees that likely significant effects on Hydrology and Flood Risk are avoided, appropriately monitored and that required action would be undertaken where necessary.	Agreed

Reference Number	Discussion point	Applicants' position	Lancashire County Council LLFA position	Status
		that required action would be undertaken where necessary		
Other Documents and Plans				
LCC.HFR.13	Outline management plans	The CoCP and the accompanying management plans are secured through Requirement 8 of the draft DCO and are appropriate with regard to mitigation measures and monitoring	The LLFA agrees that the CoCP and the accompanying management plans are appropriate with regard to mitigation measures.	Agreed

1.4.3 Onshore Ecology and Nature Conservation

Table 1.6: Agreement Log between the parties on Onshore Ecology and Nature Conservation

Reference Number	Discussion point	Applicants' position	Lancashire County Council position	Status
EIA				
LCC.OE.1	Consultation	The Applicants have undertaken adequate consultation with LCC on potential impacts on onshore ecology and nature conservation.	Whilst LCC have raised concerns regarding the overall adequacy of consultation undertaken by the Transmission Assets project (AoC-008) LCC agree confirm that the consultation for onshore ecology and nature conservation has been adequate.	Agreed
LCC.OE.2	Consultation	The EIA has had due regard to matters raised by LCC through statutory and non-statutory consultation on potential impacts on onshore ecology and nature conservation.	<p>Not all ecology matters raised by LCC have been fully addressed, including:</p> <p>Sufficient information is required to satisfy the Examining Authority that there is no satisfactory alternative location or design solution with a reduced ecological impact. Before impacts on the BHS are accepted, it would be appropriate for the applicant to provide details of other options explored and why they were not feasible.</p> <p>8.5% of the Onshore Order Limits and 19.6% of the survey area were assessed from surveys undertaken in adjacent parcels, through the use of aerial photography and desk-</p>	Not agreed

Reference Number	Discussion point	Applicants' position	Lancashire County Council position	Status
			<p>based analysis, rather than site-based habitat surveys. This may have implications for the accuracy of habitat classification, habitat condition assessments, presence of micro-habitats, potential roosting features and individual species etc. In turn, this could affect the accuracy of biodiversity gain calculations. The Examining Authority will need to be satisfied that survey coverage is sufficient to inform determination of the application.</p> <p>Potential impacts on some Species of Principal Importance (NERC Act, 2006) are not clear e.g. Common Toad, Hedgehog, Brown Hare. CIEEM Guidelines for Ecological Impact Assessment (EcIA) class these as important ecological features for the purposes of EcIA (although addressing these through PWMS could be considered by the Examining Authority).</p> <p>Areas for biodiversity gains include areas within wildlife hazard management zones. It is not yet clear if the indicative habitat creation/enhancement will be found to be acceptable, appropriate or effective within these areas or if alternative provision will be required.</p>	

Reference Number	Discussion point	Applicants' position	Lancashire County Council position	Status
			It is not yet clear that the scheme would meet the requirements of NPS EN-1 in relation to biodiversity gains.	
LCC.OE.3	Policy and planning	<p>The Application has identified and considered the plans and policies relevant to onshore ecology and nature conservation, within LCC's remit.</p> <p>Section 1.1.1 and Table 1.3 of the Onshore Biodiversity Benefit Statement (APP-216) details the relevance to the NPPF. The Applicants have provided a detailed description on BNG policies in their Biodiversity Benefit – Supporting Statement (REP5-145).</p>	<p>LCC requires the Applicants to signpost to where the proposed biodiversity benefits addressed the NPPF requirements in OEMP and biodiversity benefits statement.</p> <p>LCC confirms that the Applicants have identified the relevant adopted plans and policies within their assessment.</p>	Agreed
LCC.OE.4	Surveys	<p>The scope of the onshore ecology surveys (including species, survey coverage and survey effort) was appropriate. The surveys were undertaken in accordance with the appropriate methodologies and agreed at an early stage in the project through the Expert Working Group (EWG) meetings with key nature conservation stakeholders, in accordance with appropriately qualified, licenced and experienced ecologists.</p> <p>Specific surveys just for species of principle importance are not generally</p>	<p>LCC does not dispute that surveys were undertaken using appropriate methodologies but has concerns relating to the points below. LCC is not able to establish that gaps in survey data are immaterial.</p> <p>8.5% of the Onshore Order Limits and 19.6% of the survey area were assessed from surveys undertaken in adjacent parcels, through the use of aerial photography and desk-based analysis, rather than site-based habitat surveys. This may have implications for the accuracy of</p>	Not agreed

Reference Number	Discussion point	Applicants' position	Lancashire County Council position	Status
		<p>undertaken as the list is c. 300+ (many invertebrate species are included). Surveys were only undertaken where significant effects are predicted.</p> <p>Technical Engagement Plan Appendices Part 2 of 3 (APP-191) confirms that representative(s) from LCC were invited and, where possible, present at EWG meetings</p>	<p>habitat classification, habitat condition assessments, presence of micro-habitats, potential roosting features and individual species etc. In turn, this could affect the accuracy of biodiversity gain calculations. The Examining Authority will need to be satisfied that survey coverage is sufficient to inform determination of the application, taking into account their own statutory obligations (For example, those stated within the Habitats Regulations).</p> <p>Potential impacts on some Species of Principal Importance (NERC Act, 2006) are not clear e.g. Common Toad, Hedgehog, Brown Hare. CIEEM Guidelines for Ecological Impact Assessment (EcIA) class these as important ecological features for the purposes of EcIA (although addressing these through PWMS could be considered by the Examining Authority).</p> <p>LCC Ecologists did not receive an invite to the Expert Working Group.</p>	
LCC.OE.5	Surveys	The limitations of access are not considered to affect the validity of the baseline assessment, particularly given	Lancashire Council is content to defer to Natural England regarding surveys for protected species	Not agreed

Reference Number	Discussion point	Applicants' position	Lancashire County Council position	Status
		<p>that much of the unvisited habitats were either built up areas (residential development, garden or hardstanding), or agricultural land that are of low ecological value.</p> <p>The limitations of access constraints are acknowledged in Section 3.10.5 of Volume 3 Chapter 3: Onshore Ecology and Nature Conservation (APP-075), and are not considered to affect the validity of the baseline assessment, particularly given that much of the unvisited habitats were either built up areas (residential development, garden or hardstanding), or agricultural land that are of low ecological value.</p> <p>A Phase 1 Habitat Survey Coverage Plan has been provided at Deadline 4 to further clarify the extent. This has been provided in Annex 3.3: Applicants' response to ExQ1: 6.1.1: Phase 1 Habitat Survey Coverage.</p> <p>No outstanding issues remain with Natural England on the survey coverage of protected species, with the exception of sand lizards. In their D5 submission, Natural England confirmed that the Applicants' approach of assumed presence of sand lizards across the proposed impacted site was acceptable..</p>	<p>8.5% of the Onshore Order Limits and 19.6% of the survey area were assessed from surveys undertaken in adjacent parcels, through the use of aerial photography and desk-based analysis, rather than site-based habitat surveys. This may have implications for the accuracy of habitat classification, habitat condition assessments, presence of micro-habitats, potential roosting features and individual species etc. In turn, this could affect the accuracy of biodiversity gain calculations. The Examining Authority will need to be satisfied that survey coverage is sufficient to inform determination of the application.</p> <p>LCC is not able to establish that gaps in survey data are immaterial.</p> <p>In relation to statutory designated sites and licensable impacts on protected species, to be considered in relation to Letter of No Impediment, LCC can defer to Natural England.</p>	

Reference Number	Discussion point	Applicants' position	Lancashire County Council position	Status
LCC.OE.6	Baseline environment	<p>Sufficient site-specific and desktop data has been collated to appropriately characterise the baseline for onshore ecology and nature conservation to inform the EIA.</p> <p>The Applicants confirm that NVC surveys were undertaken at Lytham St Annes Dunes SSSI/LNR and the Old Links Golf Course BHS</p>	<p>8.5% of the Onshore Order Limits and 19.6% of the survey area were assessed from surveys undertaken in adjacent parcels, through the use of aerial photography and desk-based analysis, rather than site-based habitat surveys. This may have implications for the accuracy of habitat classification, habitat condition assessments, presence of micro-habitats, potential roosting features and individual species etc. In turn, this could affect the accuracy of biodiversity gain calculations. The Examining Authority will need to be satisfied that survey coverage is sufficient to inform determination of the application.</p> <p>LCC is not able to establish that gaps in survey data are immaterial.</p> <p>Potential impacts on some Species of Principal Importance (NERC Act, 2006) are not clear e.g. Common Toad, Hedgehog, Brown Hare. CIEEM Guidelines for Ecological Impact Assessment (EclA) class these as important ecological features for the purposes of EclA (although addressing these through PWMS could be considered by the Examining Authority).</p>	Not agreed

Reference Number	Discussion point	Applicants' position	Lancashire County Council position	Status
			<p>In relation to protected species implications LCC can defer to Natural England on all species licensing matters to be considered in relation to Letter of No Impediment.</p> <p>LCC can defer to Natural England on all matters relating to statutory designated sites, including Habitats Regulations Assessments.</p>	
LCC.OE.7	Baseline environment	The Applicants have adequately characterised the baseline environment for onshore ecology and nature conservation.	<p>8.5% of the Onshore Order Limits and 19.6% of the survey area were assessed from surveys undertaken in adjacent parcels, through the use of aerial photography and desk-based analysis, rather than site-based habitat surveys. This may have implications for the accuracy of habitat classification, habitat condition assessments, presence of micro-habitats, potential roosting features and individual species etc. In turn, this could affect the accuracy of biodiversity gain calculations. The Examining Authority will need to be satisfied that survey coverage is sufficient to inform determination of the application.</p>	Not agreed

Reference Number	Discussion point	Applicants' position	Lancashire County Council position	Status
			<p>LCC is not able to establish that gaps in survey data are immaterial.</p> <p>Potential impacts on some Species of Principal Importance (NERC Act, 2006) are not clear e.g. Common Toad, Hedgehog, Brown Hare. CIEEM Guidelines for Ecological Impact Assessment (EclA) class these as important ecological features for the purposes of EclA (although addressing these through PWMS could be considered by the Examining Authority).</p> <p>In relation to protected species implications LCC can defer to Natural England on all species licensing matters to be considered in relation to Letter of No Impediment.</p> <p>LCC can defer to Natural England on all matters relating to statutory designated sites, including Habitats Regulations Assessments.</p>	
LCC.OE.8	Scoping	Agreement to the scoping of impacts for the EIA for onshore ecology and nature conservation.	<p>Potential impacts on some Species of Principal Importance (NERC Act, 2006) are not clear e.g. Common Toad, Hedgehog, Brown Hare. CIEEM Guidelines for Ecological Impact Assessment (EclA) class these as important ecological features for the purposes of EclA.</p>	Not agreed but not material (impacts on these species may be dealt with through Requirements and further pre

Reference Number	Discussion point	Applicants' position	Lancashire County Council position	Status
			Addressing the above issue through PWMS could be considered by the Examining Authority. Provided this can be addressed post-determination and prior to construction, then this could be considered immaterial.	commencement survey)
LCC.OE.9	Biodiversity Net Gain	<p>The approach for determining the BNG baseline and the areas to be omitted from the BNG baseline is appropriate. Biodiversity benefit measures will be provided on a voluntary basis; however there is a commitment in the EMP to deliver biodiversity enhancements (outside the BNG framework) to meet NPPF requirements.</p> <p>The Applicants have updated the Biodiversity Benefit Statement (document reference J11, REP-074) and submitted a Biodiversity Benefit Supporting Statement (S_D5_11, REP5-145) at Deadline 5 which provides clarification on the Applicants' approach and how it meets policy requirements.</p>	<p>Section 4.6 of National Policy Statement for Energy (EN-1) and Section 187 of NPPF include requirements for biodiversity gains.</p> <p>Table 3 of the Biodiversity Benefit Supporting Statement indicates significant potential losses (subject to identification of exact construction footprint).</p> <p>The biodiversity metric has not been applied in accordance with the DEFRA Biodiversity Metric User Guide. Specifically, it appears that there are habitat losses that will not be restored to baseline type and condition within two years, which have not been taken into account (See section 6 of the DEFRA user guide). As such, time lag impacts/temporal risks on biodiversity have not been properly taken into account, resulting in understated biodiversity losses.</p> <p>Other DCO schemes have provided biodiversity gains in relation to</p>	Not agreed

Reference Number	Discussion point	Applicants' position	Lancashire County Council position	Status
			<p>temporary impacts not restored within 2 years.</p> <p>Provided that the Examining Authority has sufficient baseline information and is satisfied that biodiversity gains can be achieved in line with national policy requirements (Including NPPF and NPS EN-1) then details can be dealt with post-consent (as would be the case for developments subject to mandatory 10% BNG).</p> <p>(See also post-hearing submission to ISH4).</p>	
LCC.OE.10	Study area	The EIA study area is appropriate for the receptors, sites and impacts assessed.	<p>Extent of study area not disputed. However, 8.5% of the Onshore Order Limits and 19.6% of the survey area were assessed from surveys undertaken in adjacent parcels, through the use of aerial photography and desk-based analysis, rather than site-based habitat surveys.</p> <p>LCC is not able to establish that gaps in survey data are immaterial.</p>	Agreed
LCC.OE.11	Project design envelope	The EIA chapter has identified, described and assessed the maximum design scenario for the EIA.	The maximum design scenario appears to be appropriate for the project	Agreed

Reference Number	Discussion point	Applicants' position	Lancashire County Council position	Status
LCC.OE.12	Assessment methodology	The sensitivity of the onshore ecology and nature conservation receptors has been correctly identified and sufficiently described within the EIA.	<p>Sensitivity of receptors to time-lag impacts arising from habitat losses that will not be restored to baseline type and condition within two years, have not been adequately considered (see also comments on biodiversity benefits).</p> <p>LCC can defer to Natural England regarding Statutory designated sites and licensable impacts on protected species.</p>	Not agreed
LCC.OE.13	Assessment methodology	The assessment methodology for onshore ecology and nature conservation is appropriate.	<p>Field survey methods are not disputed. However, there are outstanding issues with regard to how the methods have been applied across the study area</p> <p>The biodiversity metric has not been applied in accordance with the DEFRA Biodiversity Metric User Guide. Specifically, it appears that there are habitat losses that will not be restored to baseline type and condition within two years, which have not been taken into account (See section 6 of the DEFRA user guide). As such, time lag impacts/temporal risks on biodiversity have not been properly taken into account, resulting in understated biodiversity losses.</p> <p>Potential impacts on some Species of Principal Importance (NERC Act, 2006) are not clear e.g. Common Toad, Hedgehog, Brown Hare. CIEEM Guidelines for Ecological</p>	Not agreed

Reference Number	Discussion point	Applicants' position	Lancashire County Council position	Status
			Impact Assessment (EclA) class these as important ecological features for the purposes of EclA (although addressing these through PWMS could be considered by the Examining Authority).	
LCC.OE.14	CEA assessment methodology	The list of projects screened into the CEA in the EIA is appropriate.	List of projects having potential cumulative impacts appears to be appropriate	Agreed
LCC.OE.15	Assessment of the effects from the Transmission Assets alone.	There will be no significant residual effects on nationally designated ecological sites for the impacts from the Transmission Assets alone. Volume 3, Chapter 3 (APP075) presents an assessment of the impacts with embedded mitigation to reach a conclusion on the significance of effects, and the residual effects taking into account any secondary mitigation proposed.	LCC can defer to Natural England regarding Statutory designated sites.	LCC will defer to NE's judgement on this matter.
LCC.OE.16	Assessment of the effects from the Transmission Assets alone.	There will be no significant residual effects on Local Nature Reserves, Ecological Networks and the majority of Biological Heritage Sites (BHS) for the impacts from the Transmission Assets alone. However, significant residual effects are predicted at the Mill Brook Valley BHS. The Applicants refer LCC to the BRAG assessments provided in Volume 1,	LCC have noted that they would expect to see the avoidance of key ecological habitats when developing the cable corridor routing, including why Westfield Farm Ponds BHSs were not avoided LCC have asked for further clarity on site selection and whether the Applicants can we go through the BHSs individually and clarify where	Not agreed

Reference Number	Discussion point	Applicants' position	Lancashire County Council position	Status
		<p>Annex 4.1: Selection and refinement of cable landfall (APP-031) and Volume 1, Annex 4.3: Selection and Refinement of the Onshore Infrastructure (APP-033) and summarised in Volume 1, Chapter 4: Site Selection and Consideration of Alternatives (AS-26). It was confirmed to LCC at the meeting that this does not just consider ecology but considers all environmental topics holistically.</p> <p>The Applicants confirmed that it would seek to avoid Mill Brook Valley BHS through micro-siting, however it required the flexibility where this was not possible</p>	<p>they were avoided, if they weren't avoided why, and mitigation requirements.</p> <p>Before impacts on the BHS are accepted, it would be appropriate for the applicant to provide details of all other options explored and why they were not feasible.</p> <p>LCC not able to conclude that there will be no significant residual effects on BHSs.</p> <p>Further information necessary to demonstrate no significant residual effects. This will need to include final design details and full details of avoidance, mitigation and compensation measures.</p>	
LCC.OE.17	Assessment of the effects from the Transmission Assets alone.	<p>There will be no significant residual effects on priority habitats, irreplaceable habitats such as coastal sand dunes, ancient woodland or veteran trees, or Habitats of Principal Importance, such as lowland fen, for the impacts from the Transmission Assets alone. See responses provided to REP1-085 10.35 (Applicants' Response to Fylde Council Local Impact Report – REP2-039) which states that the project will not result in the loss or deterioration of irreplaceable habitats.</p>	<p>LCC, reiterated REP1-085 10.37 - 'No works that could have a detrimental impact on irreplaceable habitats should be approved unless the applicant provides a robust statement to describe alternatives explored to avoid these impacts and why they were not feasible. Bespoke compensation measure should be provided for any unavoidable impacts on irreplaceable habitats and should be secured by an appropriate DCO Requirement.'</p>	Not agreed

Reference Number	Discussion point	Applicants' position	Lancashire County Council position	Status
		<p>However, significant residual effects are predicted for impacts on good quality semi-improved grassland within Mill Brook Valley BHS. The Applicants updated the OEMP at Deadline 4 to include measures that will be implemented at Mill Brook Valley BHS.</p>	<p>8.5% of the Onshore Order Limits and 19.6% of the survey area were assessed from surveys undertaken in adjacent parcels, through the use of aerial photography and desk-based analysis, rather than site-based habitat surveys. This may have implications for the detection of some irreplaceable habitats such as lowland fen. LCC is not able to establish that gaps in survey data are immaterial.</p> <p>No works that could have a detrimental impact on irreplaceable habitats should be approved unless the applicant provides a robust statement to describe alternatives explored to avoid these impacts and why they were not feasible. Bespoke compensation measure should be provided for any unavoidable impacts on irreplaceable habitats and should be secured by an appropriate DCO Requirement.</p> <p>Further information necessary to demonstrate no significant residual effects. This will need to include final design details and full details of avoidance, mitigation and compensation measures.</p>	

Reference Number	Discussion point	Applicants' position	Lancashire County Council position	Status
			LCC not able to establish that there will be no significant residual effects on habitats of principal importance or irreplaceable habitats.	
LCC.OE.18	Assessment of the effects from the Transmission Assets alone.	The Applicants confirm that as a result of the trenchless crossing at the coastal dunes that the technique will not cause any changes in hydrology that could affect the sensitive dune slacks.	LCC can defer to Natural England regarding Statutory designated sites and licensable impacts on protected species. LCC content to defer to Fylde BC and their ecology/sand dune advisors in respect of dune habitats.	LCC will defer to NE's judgement on this matter
LCC.OE.19	Assessment of the effects from the Transmission Assets alone.	Sufficient information has been provided with respect to peat resources within the study area to determine the likely significant effects of the Transmission Assets and inform mitigation requirements. (This receptor is assessed in Volume 3, Chapter 6: Land use and recreation (APP-104)).	This matter appears to be a soil management issue rather than an ecology issue	LCC is content to defer to others on this issue
LCC.OE.20	Assessment of the effects from the Transmission Assets alone.	There will be no significant residual effects on protected species for the impacts from the Transmission Assets alone. Paragraphs 1.5.3.10 - 1.5.3.25 and 1.6.4.7 - 1.6.4.14 of the Outline Ecological Management Plan (REP3-022) describe the precautionary measures to avoid killing and injury of bats where work is carried out in and close to habitats that they use. Where	LCC can defer to Natural England regarding licensable impacts on protected species. Outline ecological management plan, including detailed precautionary working methods for the avoidance of impacts on protected species (including pre-construction surveys) can be addressed through planning	LCC is content to defer to NE on the protected species issue

Reference Number	Discussion point	Applicants' position	Lancashire County Council position	Status
		<p>necessary, any works that are considered to result in adverse effects on favourable conservation status will be carried out under a protected species mitigation licence from Natural England. which requires the projects to carry out pre-construction survey works to establish whether a European protected species or nationally protected species is present on the land affected or is likely to be affected by the relevant stage of works. Where this is the case, the Applicants must submit a scheme of protection and mitigation measures to the relevant planning authority, or a European Protected Species licence granted by Natural England.</p> <p>Further mitigation for noise and vibration to sand lizards is set out in paragraphs 3.11.13.19 to 3.11.13.19 in Volume 3 Chapter 3: Onshore ecology and nature conservation. An outline Sand Lizard Mitigation Plan has been submitted at Deadline 4 (S_D4_14_MMTA_Sand Lizard Mitigation Plan_F01).</p> <p>The Applicants confirm that impacts to the bat roost at Penwortham relate to disturbance and therefore, an EPS licence is not appropriate.</p> <p>The Applicants have confirmed that mitigation for sand lizards will be implemented via an EPS licence. The Applicants are engaging with Natural England to obtain a Letter of No</p>	requirements as a post-determination matter.	

Reference Number	Discussion point	Applicants' position	Lancashire County Council position	Status
		Impediment (LONI) prior to the close of the examination.		
LCC.OE.21	Assessment of the effects from the Transmission Assets alone.	There would be no significant effects on any other notable species or Species of Principal Importance.	<p>LCC not able to establish that there would be no significant effects on any other notable species or Species of Principal Importance.</p> <p>Potential impacts on some Species of Principal Importance (NERC Act, 2006) are not clear e.g. Common Toad, Hedgehog, Brown Hare. No surveys undertaken for these species. CIEEM Guidelines for Ecological Impact Assessment (EcIA) class these as important ecological features for the purposes of EcIA (although addressing these through PWMS could be considered by the Examining Authority).</p>	Not agreed but not material (for reason stated and lack of survey data on some areas of the site. The absence of data for these particular species may be able to be addressed through pre commencement surveys)
LCC.OE.22	Assessment of the effects from the Transmission Assets alone.	Sufficient information has been provided within the Habitats Regulations Stage 1 Screening Report and Stage 2 Information to Support an Appropriate Assessment to establish no likely significant effect on any European Designated Site, qualifying features or functionally linked land.	LCC can defer to Natural England regarding Statutory designated sites and related Habitats Regulations Assessments (including impacts on functionally linked land).	LCC is content to defer to NE on this issue
LCC.OE.23	Assessment of the effects from the Transmission Assets cumulatively with other projects	There will be no significant effects on the majority of onshore ecology and nature conservation receptors for the impacts from the Transmission Assets when considered cumulatively with other	LCC not able to establish that there will be no significant effects on the majority of onshore ecology and nature conservation receptors.	Not agreed

Reference Number	Discussion point	Applicants' position	Lancashire County Council position	Status
		<p>projects. However significant effects are predicted for the Mill Brook Valley BHS and good quality semi-improved grassland.</p>	<p>8.5% of the Onshore Order Limits and 19.6% of the survey area were assessed from surveys undertaken in adjacent parcels, through the use of aerial photography and desk-based analysis, rather than site-based habitat surveys. This may have implications for the accuracy of habitat classification, habitat condition assessments, presence of micro-habitats, potential roosting features and individual species etc. In turn, this could affect the accuracy of biodiversity gain calculations. The Examining Authority will need to be satisfied that survey coverage is sufficient to inform determination of the application.</p> <p>Potential impacts on some Species of Principal Importance (NERC Act, 2006) are not clear e.g. Common Toad, Hedgehog, Brown Hare. CIEEM Guidelines for Ecological Impact Assessment (EclA) class these as important ecological features for the purposes of EclA (although addressing these through PWMS could be considered by the Examining Authority).</p> <p>Table 3 of the Biodiversity Benefit Supporting Statement indicates significant potential losses (subject</p>	

Reference Number	Discussion point	Applicants' position	Lancashire County Council position	Status
			<p>to identification of exact construction footprint).</p> <p>The biodiversity metric has not been applied in accordance with the DEFRA Biodiversity Metric User Guide. Specifically, it appears that there are habitat losses that will not be restored to baseline type and condition within two years, which have not been taken into account (See section 6 of the DEFRA user guide). As such, time lag impacts/temporal risks on biodiversity have not been properly taken into account, resulting in understated biodiversity losses.</p>	
LCC.OE.24	Mitigation and monitoring	The commitment to undertake pre-construction surveys for aquatic invertebrates, terrestrial invertebrates, bats, badgers, breeding birds, reptiles, otters, water voles, fish and eel is considered appropriate.	<p>Pre-construction surveys for these species would be appropriate.</p> <p>Additional pre-construction surveys for species of principal importance likely to be present and affected would also be appropriate (unless avoidance of impacts can be demonstrated in the absence of survey data).</p>	Agreed (provided that the commitment is backed up through suitably worded Requirements)
LCC.OE.25	Mitigation and monitoring	The District Level Licensing scheme for Great Crested Newts has been applied appropriately. For other protected species, the Applicants are committed to obtain protected species licences from Natural England (where necessary), which is considered appropriate.	LCC can defer to Natural England regarding licensable impacts on protected species.	LCC is content to defer to NE on this issue

Reference Number	Discussion point	Applicants' position	Lancashire County Council position	Status
LCC.OE.26	Mitigation and monitoring	The adequacy of the proposed trenchless technique in avoiding damage to sand lizards and their habitat, and mitigation to produce a hydrological risk assessment is considered appropriate.	LCC can defer to Natural England regarding licensable impacts on protected species.	LCC is content to defer to NE on this issue
LCC.OE.27	Mitigation and monitoring	<p>Measures to avoid impacts will include alignment of cable corridors micro-siting of infrastructure, e.g., at Mill Brook Valley BHS.</p> <p>Mitigation measures relating to Mill Brook Valley BHS were added to the OEMP (J6/F05).</p>	<p>Alignment of cable corridors and micro-siting of infrastructure to avoid ecological impacts, including impacts on BHSs would be appropriate. The Examining Authority will need to determine if this is feasible.</p> <p>Trenchless techniques should also be considered to avoid impacts on any BHS where feasible (for example to avoid habitat fragmentation, habitat loss, disturbance etc).</p> <p>The Examining Authority may take the view that details of avoidance measures can be addressed post-determination. However, before impacts on the BHS are accepted, it would be appropriate for the applicant to provide details of other options explored and why they were not feasible.</p>	This matter may be agreed subject to suitably worded Requirements or other working programmes being agreed with provide for appropriate siting of the development to avoid or minimise ecological impacts including on BHS's
LCC.OE.28	Mitigation and monitoring	The mitigation measures and monitoring outlined in Volume 3, Chapter 3: Onshore Ecology and Nature Conservation (APP-075), the	Further detail can be addressed post-determination if approved.	This matter may be agreed subject to suitably worded Requirements or

Reference Number	Discussion point	Applicants' position	Lancashire County Council position	Status
		Commitments Register (AS-030) and the Outline Ecological Management Plan (APP-212) for all other species and habitats are appropriate and will ensure significant effects are avoided.	LCC may defer to District Councils responsible for discharge of DCO Requirements.	other working programmes being agreed with provide for appropriate siting of the development to avoid or minimise ecological impacts including on BHS's
Other Documents and Plans				
LCC.OE.29	Outline Management Plans	The measures set out in the Outline Ecological Management Plan (APP-075) are secured in the draft DCO (AS-004) and are appropriate with regard to proposed mitigation measures, long term habitat maintenance, management and monitoring.	<p>Further detail can be addressed post-determination if approved.</p> <p>LCC may defer to District Councils responsible for discharge of DCO Requirements.</p>	This matter may be agreed subject to suitably worded Requirements or other working programmes being agreed with provide for appropriate siting of the development to avoid or minimise ecological impacts including on BHS's

1.4.4 Green Belt and Area of Separation

Table 1.7: Agreement Log between the parties on Green Belt and Area of Separation

Reference Number	Discussion point	Applicants' position	Lancashire County Council position	Status
Green Belt				
Site Selection				
LCC.GB.1	Site Selection	The Applicants have undertaken a site selection exercise which demonstrates that the Green Belt cannot be avoided in its entirety due to the Point of Interconnection to the Grid at Pentwortham Substation.	LCC are reviewing the Green Belt Technical Note submitted at Deadline 4 (REP4-092).	Ongoing point of discussion
LCC.GB.2	Site Selection	The process to identify suitable sites for the required onshore substations commences with a 5km search zone drawn around the Penwortham Substation. Based on previous project experience and technical and commercial feasibility, this radius was used to minimise the length of the 400 kV grid connection cables that would link the new substations to the POI, minimise cable reactive power issues, mitigate transmission losses and to minimise adverse effects on economic efficiency. Due to environmental constraints identified in the first stage, this radius was increased to 8km due to a lack of suitable sites. This search radius for the location of the substations is justified.	LCC are reviewing the Green Belt Technical Note submitted at Deadline 4 (REP4-092).	Ongoing point of discussion
LCC.GB.3	Site Selection	The Applicants have provided reasoned justification to explain why the substations cannot be co-located on a single site.	LCC are reviewing the Green Belt Technical Note submitted at Deadline 4 (REP4-092).	Ongoing point of discussion

Reference Number	Discussion point	Applicants' position	Lancashire County Council position	Status
		<p>This is principally due to the substations being electrically separate and to avoid interference during construction and operation.</p> <p>Co-locating the substations within a single site would result in no efficiencies of scale and would result in a larger, more harmful feature in the landscape, than two individual substations.</p>		
Policy				
LCC.GB.4	Policy and Planning	The Applicants have appropriately identified and considered all plans and policies relevant to the Green Belt within LCC's remit in the Application.	LCC are reviewing the Green Belt Technical Note submitted at Deadline 4 (REP4-092).	Ongoing point of discussion
LCC.GB.5	Policy and Planning	The Application falls to be determined under s104 of the Planning Act 2007 and that NPS EN-1, along with the relevant technology specific NPSs (in this case, EN-3 and EN-5) will be the primary policy for decision making by the Secretary of State.	LCC are reviewing the Green Belt Technical Note submitted at Deadline 4 (REP4-092).	Ongoing point of discussion
LCC.GB.6	Policy and Planning	Whilst the Application must be determined in accordance with the relevant NPSs under s104, regard must also be had to any other matters of importance and relevance. This may include relevant policies, guidance and strategy documents within the NPPF and local development plans.	LCC are reviewing the Green Belt Technical Note submitted at Deadline 4 (REP4-092).	Ongoing point of discussion
LCC.GB.7	Policy and Planning	The fundamental aim of Green Belt, namely ' <i>to prevent urban sprawl by keeping land permanently open</i> ' and the essential characteristics of 'openness and permanence' as set out in paragraph 142 of NPPF 2025 are clear and agreed	LCC are reviewing the Green Belt Technical Note submitted at Deadline 4 (REP4-092).	Ongoing point of discussion

Reference Number	Discussion point	Applicants' position	Lancashire County Council position	Status
LCC.GB.8	Policy and Planning	Green Belt is a land use and spatial policy designation. It is not a landscape designation for an area that has been identified as a landscape of higher value than an 'ordinary, everyday landscape', as per guidance set out in GLVIA3.	LCC are reviewing the Green Belt Technical Note submitted at Deadline 4 (REP4-092).	Ongoing point of discussion
LCC.GB.9	Policy and Planning	The 'openness' of Green Belt is capable of having both spatial and visual elements.	LCC are reviewing the Green Belt Technical Note submitted at Deadline 4 (REP4-092).	Ongoing point of discussion
LCC.GB.10	Policy and Planning	When considering 'spatial' openness, the relevant factors are the scale, form and density of built development. 'Openness' does not imply a freedom from any built form.	LCC are reviewing the Green Belt Technical Note submitted at Deadline 4 (REP4-092).	Ongoing point of discussion
LCC.GB.11	Policy and Planning	When considering 'visual' openness, consideration is given to the role of topography, vegetation, buildings, linear features in maintaining or screening open views of the wider Green Belt.	LCC are reviewing the Green Belt Technical Note submitted at Deadline 4 (REP4-092).	Ongoing point of discussion
LCC.GB.12	Policy and Planning	The Supreme Court in <i>Samuel Smith Old Brewery (Tadcaster) and Others v North Yorkshire County Council [2020]</i> held that the consideration of the visual impacts of a development on openness '...is a matter not of legal principle, but of planning judgement' (paragraph 25) and that, whilst decision makers are not obliged by law to consider visual impacts, they may form a material consideration.	LCC are reviewing the Green Belt Technical Note submitted at Deadline 4 (REP4-092).	Ongoing point of discussion
LCC.GB.13	Policy and Planning	To this end, the presence of vegetation and landform are capable of providing visual enclosure to a development which may mitigate its impacts on spatial and visual openness; and	LCC are reviewing the Green Belt Technical Note submitted at Deadline 4 (REP4-092).	Ongoing point of discussion

Reference Number	Discussion point	Applicants' position	Lancashire County Council position	Status
		by extension, reduce/ mitigate harm by inappropriateness and any other harm (in relation to landscape and visual effects), on the Green Belt through design.		
Function and Purposes of the Green Belt				
LCC.GB.14	Policy and Planning	The five purposes of the Green Belt are as defined in paragraph 143 of the NPPF 2025.	LCC are reviewing the Green Belt Technical Note submitted at Deadline 4 (REP4-092).	Ongoing point of discussion
LCC.GB.15	Policy and Planning	The purposes of Green Belt that have relevance to this Application are a) <i>'to check the unrestricted sprawl of large built up areas'</i> and c) <i>'to safeguard the countryside from encroachment'</i> .	LCC are reviewing the Green Belt Technical Note submitted at Deadline 4 (REP4-092).	Ongoing point of discussion
LCC.GB.16	Policy and Planning	Purpose c) <i>'to safeguard the countryside from encroachment'</i> is the principal issue to be addressed.	LCC are reviewing the Green Belt Technical Note submitted at Deadline 4 (REP4-092).	Ongoing point of discussion
LCC.GB.17	Policy and Planning	<p>Purpose b) <i>'to prevent neighbouring towns merging together'</i> is not of relevance to this application because whilst Kirkham is a 'town', Freckleton and Newton with Scales are 'villages'.</p> <p>This approach aligns with Planning Policy Guidance relating to Green Belt, which states at Paragraph 005 Reference ID: 64-005-20250225 that, <i>'This purpose [b)] relates to the merging of towns, not villages'</i>.</p>	LCC are reviewing the Green Belt Technical Note submitted at Deadline 4 (REP4-092).	Ongoing point of discussion

Reference Number	Discussion point	Applicants' position	Lancashire County Council position	Status
LCC.GB.18	Policy and Planning	<p>The remaining purposes set out in paragraph 143 of the NPPF, namely:</p> <p>d) <i>'to preserve the setting and special character of historic towns'</i> and</p> <p>e) <i>'to assist in urban regeneration, be encouraging the recycling of derelict and other urban land'</i></p> <p>are not considered to be of material relevance to this Application.</p>	LCC are reviewing the Green Belt Technical Note submitted at Deadline 4 (REP4-092).	Ongoing point of discussion
LCC.GB.19	Function and Purpose	Despite the presence of Blackpool Airport, the primary purpose of the Green Belt in the area between Blackpool and St Annes is to provide a clear and separating function between the built-up settlements, and to demarcate the authority boundary between Blackpool and Fylde.	LCC are reviewing the Green Belt Technical Note submitted at Deadline 4 (REP4-092).	Ongoing point of discussion
LCC.GB.20	Function and Purpose	<p>The area of Green Belt between Kirkham and Freckleton is adjoined by areas of Separation and Countryside designations which complete the policy coverage of land between the surrounding settlements.</p> <p>Although Freckleton is a village, given the presence of the wider policy coverage in this area, the primary function of this area of Green Belt is to protect the area of land which stretches north-south between Kirkham and Freckleton.</p>	LCC are reviewing the Green Belt Technical Note submitted at Deadline 4 (REP4-092).	Ongoing point of discussion
LCC.GB.21	Function and Purpose	<p>The area of Green Belt in South Ribble to be impacted by the Transmission Assets forms part of a much larger policy area which extends over the majority of the Borough.</p> <p>The main objective of the designation is to ensure control of development in certain areas, primarily open land in rural areas, to protect it from</p>	LCC are reviewing the Green Belt Technical Note submitted at Deadline 4 (REP4-092).	Ongoing point of discussion

Reference Number	Discussion point	Applicants' position	Lancashire County Council position	Status
		development, maintain the openness and character of the area and to restrict urban sprawl.		
Harm to Green Belt				
LCC.GB.22	Policy and Planning	Development must be within Green Belt to harm it. Green Belt does not have a setting or a buffer zone of influence.	LCC are reviewing the Green Belt Technical Note submitted at Deadline 4 (REP4-092).	Ongoing point of discussion
Inappropriate Development				
LCC.GB.23	Policy and Planning	Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances. 'Very special circumstances' will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations (paragraph 153 of NPPF 2025).	LCC are reviewing the Green Belt Technical Note submitted at Deadline 4 (REP4-092).	Ongoing point of discussion
LCC.GB.24	Policy and Planning	Paragraphs 154 and 155 of the NPPF provide specific exceptions where development in the Green Belt will not be considered to be inappropriate.	LCC are reviewing the Green Belt Technical Note submitted at Deadline 4 (REP4-092).	Ongoing point of discussion
LCC.GB.25	Planning and Policy	The exceptions in paragraph 154 only apply where the development proposed will preserve the openness and not conflict with the purposes of the Green Belt.	LCC are reviewing the Green Belt Technical Note submitted at Deadline 4 (REP4-092).	Ongoing point of discussion
LCC.GB.26	Assessment	The underground onshore export cables and 400kv grid connection cables of the Transmission Assets which would in part traverse areas of Green Belt comprise ' <i>engineering operations</i> ' for the purposes of paragraph 154 h) ii) and are not considered to be 'inappropriate development' in the Green Belt.	LCC are reviewing the Green Belt Technical Note submitted at Deadline 4 (REP4-092).	Ongoing point of discussion

Reference Number	Discussion point	Applicants' position	Lancashire County Council position	Status
LCC.GB.27	Assessment	Temporary construction compounds are also considered to be ' <i>engineering operations</i> ' for the purposes of NPPF paragraph 154. However, as development must also preserve the openness and not conflict with the purposes of Green Belt in order to benefit from the exception under paragraph 154, temporary construction compounds are considered to be inappropriate development as the scale and duration of the works may result in temporal harm to the openness of the Green Belt and represent some encroachment into the countryside, contrary to purpose c) of NPPF paragraph 143.	LCC are reviewing the Green Belt Technical Note submitted at Deadline 4 (REP4-092).	Ongoing point of discussion
Assessment Methodology				
LCC.GB.28	Assessment	The parties agree that the methodology used to assess the current performance of each area of the Green Belt to be impacted by the Transmission Assets, as set out in Appendix B of the Green Belt Technical Note (F02) submitted at D4 (REP4-092) is suitable.	LCC are reviewing the Green Belt Technical Note submitted at Deadline 4 (REP4-092).	Ongoing point of discussion
LCC.GB.29	Assessment	The methodology used to assess the extent to which (if any) the Transmission Assets will impact upon the openness and purposes of each area of the Green Belt, by reason of inappropriateness or any other harm, during both the construction and operational phases of the projects, as set out in Appendix C of the Green Belt Technical Note (F02) submitted at D4 (REP4-092) is suitable.	LCC are reviewing the Green Belt Technical Note submitted at Deadline 4 (REP4-092).	Ongoing point of discussion
Scale of Harm				
LCC.GB.30	Assessment	As land used for temporary compounds will be fully reinstated upon completion, the significance of the harm to be caused to the Green Belt by	LCC are reviewing the Green Belt Technical Note submitted at Deadline 4 (REP4-092).	Ongoing point of discussion

Reference Number	Discussion point	Applicants' position	Lancashire County Council position	Status
		these elements, is mitigated by the transitory and fully reversible nature of the impacts.		
LCC.GB.31	Assessment	As the construction compounds will cause no permanent harm to the openness and purposes of the Green Belt, the relatively short-term harm to be caused by the construction compounds should be given limited, if any, weight in the determination of the Application	LCC are reviewing the Green Belt Technical Note submitted at Deadline 4 (REP4-092).	Ongoing point of discussion
LCC.GB.32	Assessment	Substations partly comprise ' <i>engineering operations</i> ', but as they will also include buildings and their scale and duration will impact openness and purposes of the Green Belt, they are considered inappropriate development for the purposes of paragraph 153 of the NPPF 2025.	LCC are reviewing the Green Belt Technical Note submitted at Deadline 4 (REP4-092).	Ongoing point of discussion
LCC.GB.33	Assessment	The harm to the Green Belt by reason of inappropriateness and identified 'other harms', principally relates to the scale of proposed built form and the buildings within the substations leading to a reduction in openness and encroachment into the countryside.	LCC are reviewing the Green Belt Technical Note submitted at Deadline 4 (REP4-092).	Ongoing point of discussion
LCC.GB.34	Assessment	'Other harms' are considered to comprise the following: landscape and visual impacts and impacts to amenity, biodiversity and highways. Harms relating to landscape and visual impacts are considered to	LCC are reviewing the Green Belt Technical Note submitted at Deadline 4 (REP4-092).	Ongoing point of discussion
LCC.GB.35	Assessment	The harm caused by the substations is reduced and mitigated through good design, proposed planting and embedded mitigation.	LCC are reviewing the Green Belt Technical Note submitted at Deadline 4 (REP4-092).	Ongoing point of discussion

Reference Number	Discussion point	Applicants' position	Lancashire County Council position	Status
LCC.GB.36	Assessment	There are benefits to be gained by having two separate substations, opposed to one large substation (as described in the Applicant's Response to Examining Authority's Written Questions (REP3-056), Q13.1.10).	LCC are reviewing the Green Belt Technical Note submitted at Deadline 4 (REP4-092).	Ongoing point of discussion
Critical National Priority Infrastructure				
LCC.GB.37	Policy and Planning	The Transmission Assets can be considered to comprise Critical National Priority Infrastructure as defined in NPS EN-1.	LCC are reviewing the Green Belt Technical Note submitted at Deadline 4 (REP4-092).	Ongoing point of discussion
LCC.GB.38	Policy and Planning	The Applicants have applied the mitigation hierarchy in relation to the rigorous site selection process which demonstrates that Green Belt cannot be avoided (specifically, that the substations cannot reasonably be sited outside the Green Belt designation), the outline design principles which seek to minimise the impact of the Transmission Assets, and proposed landscaping and biodiversity mitigation which seeks to mitigate the impacts which cannot be avoided.	LCC are reviewing the Green Belt Technical Note submitted at Deadline 4 (REP4-092).	Ongoing point of discussion
LCC.GB.39	Policy and Planning	The starting point for decision making by the Secretary of State in relation to CNP Infrastructure is that the test of very special circumstances is presumed to be met if the mitigation hierarchy has been applied.	LCC are reviewing the Green Belt Technical Note submitted at Deadline 4 (REP4-092).	Ongoing point of discussion
Very Special Circumstances				
LCC.GB.40	Assessment	Very special circumstances exist to justify the location of elements of the Transmission Assets in the Green Belt which include the wider environmental benefits associated with increased production of energy from renewable sources for the purposes of NPPF Paragraph 160	LCC are reviewing the Green Belt Technical Note submitted at Deadline 4 (REP4-092).	Ongoing point of discussion

Reference Number	Discussion point	Applicants' position	Lancashire County Council position	Status
LCC.GB.41	Assessment	The very significant benefits of increased production of energy from renewable sources outweigh the significant weight of any harm to be caused to the Green Belt by virtue of inappropriate development.	LCC are reviewing the Green Belt Technical Note submitted at Deadline 4 (REP4-092).	Ongoing point of discussion
Area of Separation				
Policy				
LCC.GB.42	Policy and planning	Local Area of Separation policy is distinct from national Green Belt policy.	The Council agree with the Applicants' position.	Ongoing point of discussion
LCC.GB.43	Policy and planning	Development must be within an Area of Separation to harm it. Areas of Separation do not have a setting or a buffer zone.	It is potentially disagreed in part that the development needs to be within the Area of Separation to have an effect on it. The Green Belt in the location of the Substations works alongside The Area of Separation. The scale of the two areas in terms of openness and views are 'read' together. Removing the Green Belt area, reduces the scale and effectiveness of both designations.	Ongoing point of discussion
LCC.GB.44	Policy and planning	Following changes to the scheme design following the PEIR Report, no part of the Transmission Assets lies within the Area of Separation designation.	The Council agrees with the Applicants' position.	Ongoing point of discussion

1.4.5 Land Use and Recreation, focusing on Public Rights of Way (ProW)

Table 1.8: Agreement log between the parties on Public Rights of Way (ProW)

Reference Number	Discussion point	Applicants' position	Lancashire County Council position	Status
EIA				
LCC.LUR.1	Consultation	The EIA has had due regard to matters raised by LCC through statutory and non-statutory consultation on potential impacts on PRowWs.	Agreed	Agreed
LCC.LUR.2	Policy and planning	The Application has identified and considered the plans and policies relevant to PRowWs, within LCC's remit.	Agreed	Agreed
LCC.LUR.3	Surveys	The scope and coverage of the recreation surveys was appropriate	Agreed	Agreed
LCC.LUR.4	Baseline environment	The Applicants have adequately characterised the baseline environment for PRowWs.	Agreed	Agreed
LCC.LUR.5	Scoping	Agreement to the scoping of impacts for the EIA for PRowWs.	Agreed	Agreed
LCC.LUR.6	Study area	The EIA study area is appropriate for the PRowWs assessed.	Agreed	Agreed
LCC.LUR.7	Project design envelope	The EIA chapter has identified, described and assessed the maximum design scenario for the EIA.	Agreed	Agreed
LCC.LUR.8	Assessment methodology.	The sensitivity of PRow receptors has been correctly identified and sufficiently described within the EIA.	Agreed	Agreed
LCC.LUR.9	Assessment methodology	The assessment methodology for PRowWs is appropriate.	Agreed	Agreed
LCC.LUR.10	CEA assessment methodology	The list of projects screened into the CEA in the EIA is appropriate.	Agreed	Agreed
LCC.LUR.11	Assessment of the effects from the Transmission Assets alone – other recreational receptors	There will be no significant effects on the PRow network, for the impacts from the Transmission Assets alone.	Agreed	Agreed

Reference Number	Discussion point	Applicants' position	Lancashire County Council position	Status
LCC.LUR.12	Assessment of the effects from the Transmission Assets cumulatively with other projects	There will be no significant residual effects on PRoWs.	Agreed	Agreed
LCC.LUR.13	Mitigation and monitoring	<p>The mitigation measures and monitoring outlined in Volume 3, Chapter 6: Land Use and Recreation (APP-104), the Commitments Register (AS-030), the Outline Public Rights of Way (PRoW) Management Plan (APP-198) are appropriate and will ensure significant effects are avoided.</p> <p>The Applicants have updated the Outline Public Rights of Way (PRoW) Management Plan (REF) at Deadline 6.</p>	Outline Public Rights of Way (PRoW) Management Plan to be finalised	Ongoing point of discussion
Other Document and Plans				
LCC.LUR.14	Outline Management Plans	<p>The measures set out in the Outline PRoW Management Plan (APP-198) are secured in the draft DCO (AS-004) and are appropriate with regard to proposed mitigation measures and monitoring.</p> <p>The Applicants have updated the Outline Public Rights of Way (PRoW) Management Plan (REF) at Deadline 6.</p>	Outstanding LCC concerns to be agreed	Ongoing point of discussion
LCC.LUR.15	Outline PRoW Management Plan	No public access routes will be permanently closed as a result of the Transmission Assets. Where avoidance has not been possible, suitable outline management measures have been proposed to maintain access to the PRoW network and the safety of users during construction, including managed	<p>Outline Public Rights of Way (PRoW) Management Plan to be finalised.</p> <p>Gated crossings are not acceptable across the public path unless for</p>	Ongoing point of discussion

Reference Number	Discussion point	Applicants' position	Lancashire County Council position	Status
		<p>crossings, a single temporary diversion (5-5-BW 16) and two permanent gated crossings.</p> <p>The Applicants have updated the Outline Public Rights of Way (PRoW) Management Plan (J1.5/F05) at Deadline 6. An amended gate design as presented in figures 1.1 to 1.3</p>	stock control. Use of Anna's Road not supported	
LCC.LUR.16	Outline PRoW Management Plan	<p>The Applicants are committed to managing temporary footpath closures in a way that prioritises public access and minimises disruption. Where closures are required, the Outline PRoW management plan provides that they will be limited to three months at any one time, and no more than six months in total for any given section of PRoW, during the construction of the relevant project. Any need to exceed this due to unforeseen circumstances encountered during construction would need to be notified to LCC (see CoT102).</p> <p>The Applicants have updated the Outline Public Rights of Way (PRoW) Management Plan (J1.5/F05) at Deadline 6. An amended gate design as presented in figures 1.1 to 1.3.</p>	Gated access restrictions	Ongoing point of discussion
LCC.LUR.17	Detailed PRoW Management Plan(s)	<p>The Applicants confirm that details regarding the design and surfacing of reinstated PRoWs would be confirmed in detailed PRoW Management Plan(s) prior to the commencement of the relevant stage of the works.</p> <p>The Applicants have updated the Outline Public Rights of Way (PRoW) Management Plan (J1.5/F05) at Deadline 6. Section 1.2 states the timescales required for notice of temporary closure and discharge of the final detailed Public Rights of Way Management Plan.</p>	Timescales to be agreed	Ongoing point of discussion

Reference Number	Discussion point	Applicants' position	Lancashire County Council position	Status
LCC.LUR.18	Detailed PRoW Management Plan(s)	The Applicants may adopt a staged approach to the discharge of DCO requirements, including the PRoW management plans. This will ensure that the relevant detail for each project is considered and approved in part or in whole, prior to the commencement of the relevant stage of works affecting that area, and provides flexibility in accordance with the construction programme of each offshore wind farm.	Agreed	Agreed
LCC.LUR.19	Detailed PRoW Management Plan(s).	<p>The Applicants will continue to consult with LCC in the development of the detailed PRoW management plan(s).</p> <p>The Applicants have updated the Outline Public Rights of Way (PRoW) Management Plan (J1.5/F05) at Deadline 6.</p>	Ongoing	Ongoing point of discussion

1.4.6 Historic Environment

Table 1.9: Agreement Log between the parties and Historic Environment

Reference Number	Discussion point	Applicants' position	Lancashire County Council position	Status
LCC.HE1	Consultation	The Application documents have had regard to matters raised by LCC via statutory and non-statutory consultation activities in relation to historic environment	Consultation would be ongoing through the preparation of the detailed Onshore and intertidal Written Scheme of Investigation (WSI) as secured in Requirement 11 of the draft DCO	Agreed
LCC.HE.2	Study Area	The EIA study area is appropriate for the impacts and receptors assessed.	Agreed.	Agreed
LCC.HE.3	Surveys	The survey approach is appropriate for the site, impacts and receptors assessed. The site-specific surveys have been undertaken in accordance with agreed methodologies.	Agreed.	Agreed
LCC. HE.4	Surveys	The approach and contents of the Desk Based Assessment is appropriate for the wider assessment.	Agreed	Agreed
LCC.HE.5	Baseline environment	Sufficient primary and secondary data (including site-specific surveys) have been collated to appropriately characterise the onshore archaeology and heritage baseline environment for the purposes of EIA within Volume 3, Chapter 5: Historic environment (APP-096).	Further programme of surveys as indicated in the Outline Onshore and Intertidal WSI (APP-214) to be completed. This is ongoing and will carry on through the discharge of condition post consent with the implementation of the detailed WSIs in line with requirement 11 of the draft DCO.	Agreed
LCC.HE.6	Assessment Methodology	The sensitivity and significance of the onshore archaeology receptors has been appropriately and adequately	Agreed.	Agreed

Reference Number	Discussion point	Applicants' position	Lancashire County Council position	Status
		described within Volume 3, Chapter 5: Historic environment (APP-096).		
LCC.HE.7	Assessment Methodology	The methodologies used in within Volume 3, Chapter 5: Historic environment (APP-096) are appropriate for assessing the potential impacts the Transmission Assets on onshore archaeology and heritage assets.	Agreed.	Agreed
LCC.HE.8	Project design envelope	The assessment has appropriately defined the Maximum Design Scenario (MDS) for the purposes of EIA.	Agreed.	Agreed
LCC.HE.9	Assessment of the effects from the project alone	The potential impacts identified within Volume 3, Chapter 5: Historic environment (APP-096) represent a comprehensive list of the potential impacts in relation to onshore archaeology and heritage assets.	Further programme of surveys as indicated in the Outline Onshore and Intertidal WSI (APP-214) to be completed. This is ongoing and will carry on through the discharge of condition post consent with the implementation of the detailed WSIs in line with requirement 11 of the draft DCO.	Agreed
LLC.HE.10	Assessment of the effects from the project alone	The likely significant adverse residual effects (in EIA terms) identified within Volume 3, Chapter 5: Historic environment (APP-096) represent a comprehensive list of the likely significant adverse residual effects on onshore archaeology.	<p>The programme of survey is yet to be fully completed. Further programme of surveys as indicated in the Outline Onshore and Intertidal WSI (APP214) to be completed to inform baseline and mitigation required.</p> <p>This is ongoing and will carry on through the discharge of condition post consent with the implementation of the detailed WSIs in line with Requirement 11 of the draft DCO.</p>	Ongoing point of discussion

Reference Number	Discussion point	Applicants' position	Lancashire County Council position	Status
LCC.HE.11	Assessment of the effects from the project cumulatively with other projects	The likely significant adverse residual effects (in EIA terms) which are predicted to arise from the development of the Transmission Assets cumulatively with other project and plans identified within Volume 3, Chapter 5: Historic environment (APP-096) represent a comprehensive list of the likely significant adverse residual effects on the historic environment.	Further programme of surveys as indicated in the Outline Onshore and Intertidal WSI (APP-214) to be completed. This is ongoing and will carry on through the discharge of condition post consent with the implementation of the detailed WSIs in line with requirement 11 of the draft DCO.	Agreed
LCC.HE.12	Mitigation	The mitigation measures identified in Volume 3, Chapter 5: Historic environment (APP-096) are considered appropriate and adequate for the Transmission Assets.	Agreed	Agreed
Other Documents and Plans				
LCC.HE.13	Outline Onshore Written Scheme of Investigation (WSI)	The Outline Onshore and Intertidal WSI (APP-214) is secured under Requirement 11 of the draft DCO (AS004) and is considered appropriate with regard to proposed monitoring and management principles	Agreed	Agreed

1.4.7 Traffic and Transport

Table 1.10: Agreement Log between the parties on Traffic and Transport

Reference Number	Discussion point	Applicants' position	Lancashire County Council position	Status
EIA				
LCC.TT.1	Consultation	<p>The Applicants have undertaken adequate consultation with LCC on the potential impacts of the Transmission Assets on traffic and transport. Table 1.2 outlines that LCC have been consulted through the issue of a formal scoping report, Preliminary Environmental Information Report (PEIR) and three EWG meetings prior to the submission of the DCO application.</p> <p>Following submission of the DCO application, Table 1.2 also outlines that the Applicants have met with LCC on five occasions as well as provided copies in responses to key matters raised by LCC within their Local Impact Report (LIR) and through engagement. The Applicants remain committed to working with LCC to resolving matters still in discussion.</p>	Some conversations have taken place throughout the process. LCC are awaiting updates to / and further documentation, which will require further consultation / communication to enable LCC to conclude this proposal.	Ongoing point of discussion
LCC.TT.2	Consultation	The Application documents have had due regard to matters raised by LCC through statutory and non-statutory consultation on traffic and transport. Table 1.2 outlines that LCC have been consulted through the issue of a formal scoping report, Preliminary Environmental Information Report (PEIR) and three EWG meetings	The documents provided to LCC to date via email, have had regard to most matters raised by LCC (where it is in the applicant's gift, i.e., land that they or the LHA controls) through statutory and non-statutory consultation on traffic and transport. LCC are awaiting further documentation. At this stage LCC cannot	Ongoing point of discussion

Reference Number	Discussion point	Applicants' position	Lancashire County Council position	Status
		<p>prior to the submission of the DCO application.</p> <p>Following submission of the DCO application, Table 1.2 also outlines that the Applicants have met with LCC on five occasions as well as provided copies in responses to key matters raised by LCC within their Local Impact Report (LIR) and through engagement. The Applicants remain committed to working with LCC to resolving matters still in discussion.</p>	indicate whether matters can be positively concluded or not.	
LCC.TT.3	Policy and planning	The Application documents have identified and considered the most up-to-date plans and policies as relevant to traffic and transport, within LCC's remit.	LCC are awaiting further documentation (e.g., evidence relating to impacts on sustainability and accessibility) to determine whether the applicant's documents align with policy and planning. At this stage LCC cannot indicate whether matters can be positively concluded or not.	Ongoing point of discussion
LCC.TT.4	Surveys	The site-specific surveys for traffic and transport have been undertaken in accordance with appropriate methodologies and sufficient primary and secondary data (including site-specific surveys) has been collated to appropriately characterise the traffic and transport baseline environment for the purposes of Environmental Impact Assessment (EIA) within Volume 3, Chapter 7: Traffic and Transport (APP-108).	Some additional surveys (carriageway width and speed) for traffic and transport have now been undertaken. LCC are awaiting further surveys to be undertaken at agreed locations (non-motorised user surveys). At this stage LCC cannot indicate whether matters can be positively concluded or not.	Ongoing point of discussion

Reference Number	Discussion point	Applicants' position	Lancashire County Council position	Status
		<p>LCC have sought clarifications through their LIR and engagement (Table 1.2) in regard to:</p> <ul style="list-style-type: none"> • Speed surveys for some accesses; • Route geometry surveys in relation to road width (for 14 links); and • Non-motorised user surveys (for seven links). <p>The Applicants have commissioned additional speed surveys and shared the results with LCC within a technical note and discussed the outcomes during meetings (detailed in Table 1.2).</p> <p>In response to LCCs LIR and engagement outlined in Table 1.2, the Applicants have undertaken further validation surveys for road widths. This information has been shared with LCC in a technical note and discussed during meetings (detailed in Table 1.2). During a meeting on the 30 June 2025 LCC have requested additional information in regard to the detailed design of mitigation and swept path analysis.</p> <p>The Applicants have agreed to a request from LCC for further validation surveys of receptor sensitivity through non-motorised user surveys at sample locations. The Applicants have agreed the location and methodology for these sample validation surveys with LCC on the 30 June 2025.</p>		

Reference Number	Discussion point	Applicants' position	Lancashire County Council position	Status
		The results will be shared with LCC once complete.		
LCC.TT.6	Baseline Environment	<p>The baseline environment for traffic and transport has been appropriately characterised in Volume 3, Chapter 7: Traffic and Transport (APP-108). The Applicants note LCCs comments in relation to Figure 7.1 and will discuss with LCC what updates are required and provide these at Deadline 4.</p> <p>The Applicants have agreed to a request from LCC for further validation surveys of receptor sensitivity through non-motorised user surveys at sample locations. The Applicants have agreed the location and methodology for these sample validation surveys with LCC on the 30 June 2025. The results will be shared with LCC once complete.</p> <p>The Applicants have provided further detail in regard to measures proposed to address the interaction with construction traffic at the Guild Wheel cycle route in the oCTMP (REP2-016) submitted at Deadline 2. During a meeting with LCC on the 30 June 2025 these measures were discussed and it was agreed that the Applicants would consider this matter further, including collecting additional data on numbers of non-motorised users (as outlined above).</p>	Further updates are required, for example Figure 7.1. LCC are awaiting further surveys to be undertaken at agreed locations (sustainability). Poor appreciation has been had to some existing sustainable infrastructure (e.g., Guild wheel cycle route). At this stage LCC cannot indicate whether matters can be positively concluded or not.	

Reference Number	Discussion point	Applicants' position	Lancashire County Council position	Status
LCC.TT.7	Study area	The traffic and transport study area is appropriate for the impacts and the receptors assessed. The Applicants position in relation to Figure 7.1 and further surveys is outlined in detail above (LCC.TT.6).	Further updates are required, for example Figure 7.1. The study area (highway links proposed to be used by this project) have changed in a couple of rural locations. LCC are awaiting further survey results at agreed locations (sustainability). At this stage LCC consider the transport study area is likely to be appropriate, subject to any further information and further changes.	Ongoing point of discussion
LCC.TT.8 and LCC.TT.9	Assessment methodology	<p>The sensitivity and significance of the traffic and transport receptors have been appropriately and adequately described within Volume 3, Chapter 7: Traffic and Transport (APP-108) and the methodologies used in within Volume 3, Chapter 7: Traffic and Transport (APP-108) are appropriate for assessing the potential impacts of the Transmission Assets.</p> <p>LCC have raised comments in regard to the assessment of delays to drivers and road safety due to route geometry (on 14 links), road safety at accesses and impacts of abnormal loads.</p> <p>The Applicants have provided further detail in regard to the range of measures to address driver delay in the oCTMP (REP2-016) submitted at Deadline 2. Following receipt of this information, LCC have requested further detail on this mitigation. The Applicants consider that these requests relate to matters of detail that can</p>	LCC are awaiting further documentation and information. At this stage LCC cannot indicate whether matters can be positively concluded or not.	Ongoing point of discussion

Reference Number	Discussion point	Applicants' position	Lancashire County Council position	Status
		<p>and should be addressed as part of the final detail CTMPs. Nonetheless the Applicants agree to continue to work with LCC to provide further detail.</p> <p>The Applicants have provided abnormal load studies (REP2-049 and REP2-050) that outline that the routes and structures are acceptable.</p> <p>The Applicants have updated the Outline Highway Access Management Plan (oHAMP) (at Deadline 3) and shared early draft designs with LCC for comment (detailed in Table 1.2). The Applicants consider that the updates to the oHAMP address all LCCs concerns.</p>		
LCC.TT.10	Project design envelope	The appropriate Maximum Design Scenario has been used to identify, describe and assess the construction vehicle trip generation, distribution and assignment in Volume 3, Annex 7.5: Construction Vehicle Trip Assumptions (APP-115). LCC have requested clarification of the numbers of HGVs (peak and average) at each access rather than per link at a meeting on the 30 June 2025. This information will be provided to LCC following Deadline 3.	LCC are awaiting further documentation and information including HGV numbers entering and exiting at each access and egress. This has not yet been provided At this stage LCC cannot indicate whether matters can be positively concluded or not.	Ongoing point of discussion
LCC.TT.11	Assessment of the effects from the project alone	No significant adverse effects on traffic and transport are predicted to arise from the development of the Transmission Assets. The Applicants latest position is outlined at LCC.TT.8 and 9	At this stage LCC cannot indicate whether matters can be positively concluded or not. LCC are still awaiting further documentation and information, including further understanding of movements in/out of each access,	Ongoing point of discussion

Reference Number	Discussion point	Applicants' position	Lancashire County Council position	Status
			updates to access designs, updates to mitigation on narrow links and further surveys. Agreement on basic parameters (suitability of carriageway for HGV use) is still outstanding. Swept path analysis for narrow highway links is outstanding. LCC highways still have significant concerns regarding safety and appropriateness of the generic approach to mitigation/traffic management.	
LCC.TT.12	Assessment of the effects from the project cumulatively with other projects	No significant adverse effects on traffic and transport are predicted to arise from the development of the Transmission Assets cumulatively with other projects and plans. The Applicants latest position is outlined at LCC.TT.8 and 9	LCC are awaiting further documentation and information, including further understanding of movements in/out of each access, updates to access designs, updates to mitigation on narrow links and further surveys. Whilst the application has considered that approved in a point in time, at this stage does not have regard to those proposals currently progressing through the planning system (such as solar farms with joint use of highway from the A583).. At this stage LCC cannot indicate whether matters can be positively concluded or not.	Ongoing point of discussion
LCC.TT.13	Mitigation	<p>The mitigation measures outlined within the outline Construction Traffic Management Plan (REP2-106) and outline Highway Access Management Plan (APP-211) are appropriate and will ensure significant effects are avoided.</p> <p>The Applicants have provided further detail in regard to the range of measures to address driver delay in the oCTMP (REP2-016) submitted at Deadline 2. Following</p>	LCC are still awaiting further documentation and information, including further understanding of movements in/out of each access, updates to access designs, updates to mitigation on narrow links and further surveys. Agreement on basic parameters (suitability of carriageway for HGV use) is still outstanding (the applicant has suggested that carriageway of 5.5m is sufficient for two HGVs to pass, which the LHA do not	Ongoing point of discussion

Reference Number	Discussion point	Applicants' position	Lancashire County Council position	Status
		receipt of this information, LCC have requested further detail on this mitigation. The Applicants consider that these requests relate to matters of detail that can and should be addressed as part of the final detail CTMPs. Nonetheless the Applicants agree to continue to work with LCC to provide further detail. LCC have agreed at a meeting on the 30 June 2025 that they will provide formal comments upon any additional amendments (beyond highway geometry) that they consider may be required to the oCTMP.	support, notwithstanding any bends in the road or forward visibility requirements). Swept path analysis for narrow highway links is outstanding. LCC highways still have significant concerns regarding safety and appropriateness of the generic approach to mitigation/traffic management. At this stage LCC cannot indicate whether matters can be positively concluded or not.	
Other Documents and Plans				
LCC.TT.14	Outline management plans	<p>The Outline Construction Traffic Management Plan (REP2-016) is secured as a requirement in the draft DCO (REP2-004) and is appropriate with regards to proposed mitigation and monitoring.</p> <p>The Applicants latest position is as outlined at LCC.TT.13.</p>	<p>As currently presented, the Outline CTMP only highlights potential mitigation, with no detail regarding the suitability and deliverability on the Highway network. This level of detail is required at this stage to ensure the principle of the proposed mitigation is acceptable, suitable and deliverable at the specific location. LCC highways still have significant concerns regarding safety and appropriateness of the generic approach to mitigation/traffic management. LCC are awaiting further documentation and update to the outline CTMP.</p> <p>At this stage LCC cannot indicate whether matters can be positively concluded or not.</p>	Ongoing point of discussion

Reference Number	Discussion point	Applicants' position	Lancashire County Council position	Status
LCC.TT.15	Outline management plans	<p>The Outline Highways Access Management Plan (AS-052) is secured as a requirement in the draft DCO (REP2-004) and is appropriate with regards to proposed mitigation and monitoring.</p> <p>The Applicants have updated the Outline Highway Access Management Plan (oHAMP) (at Deadline 3) and shared early draft designs with LCC for comment (detailed in Table 1.2). The Applicants consider that the updates to the oHAMP address all LCCs concerns.</p>	LCC are awaiting further information and updated with regards to the Outline Highways Access Management Plan. Some of the previous LCC concerns have been taken on board and overcome, whilst others currently remain. At this stage LCC cannot indicate whether matters can be positively concluded or not.	Ongoing point of discussion
LCC.TT.16	Road Condition Monitoring and Maintenance Strategy	<p>The measures to manage road condition, monitoring and maintenance outlined within the outline Construction Traffic Management Plan (REP2-106) are appropriate.</p> <p>An updated oCTMP has been provided to address comments within the LCCs LIR and raised during meetings (outlined in Table 1.2). The oCTMP includes commitments to funding of maintenance of the highway where the damage is attributable to the Transmission Assets. The requirement to produce detailed CTMPs (in agreement with LCC) is secured as a requirement in the draft DCO (REP2-004).</p> <p>LCC have agreed at a meeting on the 30 June 2025 that they will provide formal comments upon any additional</p>	Whilst there is a commitment to monitor and maintain the public highway prior, during and post project, at this stage, the mechanism for the delivery of this strategy has not been agreed. At this stage this is a risk as the LHA cannot be funding maintenance of the highway where it has been knowingly damaged by this project.	Ongoing point of discussion

Reference Number	Discussion point	Applicants' position	Lancashire County Council position	Status
		amendments that they consider may be required to the oCTMP.		

1.4.8 Development Consent Order

Table 1.11: Agreement Log between the parties on the DCO

Reference Number	Discussion point	Applicants' position	Lancashire County Council position	Status
LCC.DCO.1	Requirement 4 Substation Works	The Applicants added the following to the drafting at Deadline 5 <i>have been submitted to and approved by the relevant planning authority. and in respect of subparagraph (1)(g) in consultation with Lancashire County Council as the local highway authority.</i>	Agreed	Agreed
LCC.DCO.2	Requirement 8 Code of Construction Practice	LCC have not commented on the drafting of the requirement, as such no changes have been made to the wording, following LCC comments.	Agreed	Agreed
LCC.DCO.3	Requirement 9 Traffic and Transport	No specific comments have been raised by LCC on the drafting of the requirement as such no changes have been made to the wording following LCC comments. Comments on the OCTMP are dealt with separately within the traffic and transport section of the SOCG.	Agreed	Agreed
LCC.DCO.4	Requirement 10 Highway Accesses	LCC have previously stated the following in their D5 submission <i>The LHA is content with the revised wording for the implementation of the accesses. However, requirement 10 as currently presented does not consider the</i>	Not yet agreed	Ongoing point of discussion

Reference Number	Discussion point	Applicants' position	Lancashire County Council position	Status
		<p><i>maintenance or removal / reinstatement of the accesses and that to support the access (e.g. hedges, walls, signals, signs and kerbing etc).</i></p> <p>In this regard the Applicants have provided an OHAMP for LCC approval which includes the following ...</p> <p><i>The accesses highlighted within this OHAMP are temporary, save for those to the permanent access points for each of the onshore substations, and once a construction site access is no longer required, measures would be introduced to prevent unauthorised use and the access will be removed and the area reinstated (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 highway authority in consultation with the relevant planning authority / authorities).</i></p> <p>An amendment was also made previously (at Deadline 4) <i>further to discussions with Lancashire County Council and their request to sign off detailed highways access drawings. The wording of the requirement has been updated to reflect the drafting of the requirement in the made Mona Offshore Wind Farm Order.</i></p>		

Reference Number	Discussion point	Applicants' position	Lancashire County Council position	Status
LCC.DCO.5	Requirement 11 Onshore Archaeology	The Applicants can confirm that the onshore WSI applies to both site preparation works and construction works. No specific drafting changes have been requested by LCC to the requirement itself.	Agreed	Agreed
LCC.DCO.6	Requirement 19 Employment and Skills	The Applicants will amend the wording of the requirement at Deadline 6 to remove reference to Lancashire County Council as the approval body.	Agreed	Agreed
LCC.DCO.7	Requirement 20 Operational Drainage Management Plan	The Applicants have amended the DCO (at Deadline 5) to reflect that the responsibility for the approval of the detailed Operational Drainage Management Plan is to sit with the relevant local planning authority, in consultation with the lead local flood authority, highway authority and Environment Agency.	Agreed	Agreed

1.4.9 Landscape and Visual Resources

Table 1.12: Agreement Log between the parties on Landscape and Visual Resources

Reference Number	Discussion point	Applicants' position	Lancashire County Council position	Status
EIA				
LCC.LVR.1	Consultation	The Applicants have consulted with the Council on comments raised regarding potential impacts on landscape and visual resources, during	The Council agree that the Applicants have had preliminary discussions and engaged with the Council on the comments they have raised	Agreed

Reference Number	Discussion point	Applicants' position	Lancashire County Council position	Status
		<p>consultation activities prior to the submission of the DCO application. The Applicants acknowledge the nature of engagement that has taken place since the submission of the DCO application, noting that meaningful dialogue is most effective when all parties approach the process constructively, prepared to exchange perspectives and explore options through the structured engagement opportunities provided, rather than repeating positions set out in previously written representations.</p> <p>The Applicants have consistently communicated what is achievable within the defined parameters of the Project, as evidenced throughout their submissions to the Examination.</p> <p>While recognising the fast pace of the Examination, the Applicants wish to state that they have made sustained efforts to facilitate constructive and substantive engagement with the Council. This has included a series of meetings, the submission of information, and the provision of work-in-progress materials between Examination deadlines.</p>	<p>regarding potential impacts on landscape and visual resources, prior to the submission of the DCO application.</p> <p>Limited constructive discussions have taken place to resolve ongoing concerns over the last 6 month period.</p>	
LCC.LVR.2	Consultation	<p>The Applicants have had due regard to matters raised by the Council through statutory and non-statutory consultation to potential impacts on landscape and visual resources prior to the submission of the DCO application.</p> <p>These are detailed in Table 10.7 of Volume 3, Chapter 10: Landscape and Visual Resources (APP-123), which set out the comments raised by the Council, the Applicants' responses, and how each matter has been addressed within the ES chapter.</p>	<p>The Council agree that the Applicants have had due regard to matters raised by the Council through statutory and non-statutory consultation to potential impacts on landscape and visual resources prior to the DCO application, but very little post application.</p> <p>LCC has expressed concern with regards to how few comments have been constructively addressed over the latter 6-month period.</p>	Agreed

Reference Number	Discussion point	Applicants' position	Lancashire County Council position	Status
		The Applicants refer to their position at <i>LCC.LVR.1</i> , which acknowledges the fast pace of the Examination and reaffirms their consistent objective of facilitating constructive and substantive engagement with the Council. This proactive approach is evidenced throughout the Examination process, including through a series of targeted meetings, ongoing correspondence, and the submission of work-in-progress materials between Examination deadlines. The Applicants consider that this level of engagement demonstrates a genuine commitment to collaboration.		
LCC.LVR.3	Policy and planning	The Applicants' LVIA has addressed all relevant legislation, policies, and guidance within the Council's remit that pertains to landscape and visual resources and the assessment of potential impacts submitted as part of the ES, as set out in as set out in Volume 3, Annex 10.1: Landscape and visual resources local planning policy context (APP-124).The Applicants note the Council's views regarding the approach taken to addressing relevant legislation, policies, and guidance within the Council's remit, as set out in the Council's Written Representations during the Examination. The Applicants maintain that their approach is both compliant with relevant legislation and proportionate to the scope of the Project. This is demonstrated through the evidence and justification provided in their Examination submissions, which confirm that all applicable policy and guidance requirements have been appropriately considered and addressed.	The Council disagree that the Applicants have addressed all legislation, policies, and guidance that pertains to landscape and visual resources and the assessment of potential impacts, particularly with regards to NPS's and LCA assessments.	Not agreed

Reference Number	Discussion point	Applicants' position	Lancashire County Council position	Status
LCC.LVR.4	Surveys	<p>The locations of the representative viewpoints are appropriate, and the photographic survey was undertaken in accordance with the best practice guidance / methodology, adhering to the consultation conducted with the following statutory consultees: Natural England, Historic England, Preston City Council, Fylde Council, Blackpool Council, South Ribble Borough Council, Lancashire County Council, West Lancashire Borough Council.</p> <p>The Applicants proceeded with its assessment of potential effects on landscape and visual resources on the basis that the <i>Expert Working Group</i> (EWG), including the Council, agreed to the proposed representative viewpoint locations and associated visual material, confirming that it was sufficient to support a robust assessment for the purposes of the DCO application.</p> <p>The Applicants note that the Council was consulted in February 2024, as part of the EWG at Stakeholder Meeting 1, in relation to several site-specific survey matters. The consultation sought agreement on the following:</p> <ul style="list-style-type: none"> • The representative viewpoints for the onshore substations, as presented in the PEIR, acknowledging that final view orientations may be subject to micro-siting; • The representative and candidate viewpoint locations for the River Ribble crossing; and • The presentation of grey-rendered photomontages illustrating the main buildings and associated infrastructure at the onshore substations for all agreed viewpoint locations. 	<p>The Council notes that the representative viewpoints used in the LVIA cannot, without further funding and a more relaxed timescale, be checked.</p> <p>There are further viewpoints that would be useful, particularly if 'Moderate' scoring is included within the assessment, as suggested might be relevant by the Examiner.</p> <p>It is not unusual within an Assessment process to include further or reassessment of Viewpoints on request, and usually this is forthcoming without much issue. The Applicant has however been reluctant. Equally some of the Viewpoints were noted as lacking and updates have proven difficult to achieve.</p> <p>The Council disagree that the representative viewpoints used in the LVIA align with best practice guidance. They do not reflect ongoing consultation with the EWG.</p>	Not agreed

Reference Number	Discussion point	Applicants' position	Lancashire County Council position	Status
		Accordingly, no further photography was requested or captured undertaken after February 2024.		
LCC.LVR.5	Baseline methodology	<p>The Applicants have included all relevant and current studies and datasets in the LVIA's baseline study, which informed the subsequent assessment of effects, as recorded in Volume 3, Chapter 10 Landscape and Visual Resources.</p> <p>The Applicants wish to reiterate that the submissions forming part of the DCO application have been prepared by Chartered practitioners with extensive experience in the delivery of comparable infrastructure projects. These appropriately qualified professionals were appointed to prepare, on behalf of the Applicants, this Chapter of the ES, in accordance with recognised best practice guidance and relevant industry standards.</p>	<p>The Council disagree that the Applicants included relevant and current studies and datasets to inform the LVIA's baseline study as presented to LCC, which informed the subsequent assessment of effects.</p> <p>It has proven a repeated struggle to achieve basic information; it is not presented in a professional manner and is still lacking in some detail and legibility for the average non-professional to be able to interpret.</p>	Not agreed, but not material
LCC.LVR.6	Baseline methodology	<p>The Applicants have complied with guidance provide in <i>PINS Advice Note Nine: Rochdale Envelope</i>; using an approach that records the maximum and minimum design parameters to ensure that the worst-case scenarios are identified and assessed in the EIA.</p> <p>The Applicant reiterate that the Maximum Design Scenario defines the maximum construction, operational and decommissioning parameters of the Transmission Assets. These onshore construction parameters are secured under Requirement 5 of Schedules 2A and 2B of the draft DCO (document reference C1), which</p>	<p>The Council disagree that the Applicants have fully complied with guidance provide in <i>PINS Advice Note Nine: Rochdale Envelope</i>; using an approach that records the maximum and minimum design parameters to ensure that the worst-case scenarios are identified and assessed in the EIA.</p> <p>The Applicants accept that, in some instances, their applications are 'indicative', therefore cannot be considered a worst-case scenario.</p> <p>Equally, with relation to <i>LCC.LVR.5</i> above, and as Advice Note 9 on The Rochdale Envelope</p>	Not agreed

Reference Number	Discussion point	Applicants' position	Lancashire County Council position	Status
		<p>subsequently ensures that the substations cannot exceed the assessed parameters.</p> <p>This approach allows the assessment of a realistic worst-case scenario while retaining flexibility for detailed design to be informed by ongoing consultation and the design governance process secured in the draft DCO. For a NSIP, the approach outlined above clearly set out the 'fundamentals' of the proposed development and accords with best practice for large scale project of this nature.</p> <p>The Applicants stand by their approach, additionally referring to the additional information they have submitted during the Examination in support of stakeholders' written representations, requests and queries.</p>	<p>states: <i>"This does not give developers an excuse to provide inadequate descriptions of their projects"</i>.</p> <p>It is considered that the Applicants continue with this, the latter approach.</p> <p><u>From Advice Note 9: "the clearly defined parameters established for the Proposed Development must be sufficiently detailed to enable a proper assessment of the likely significant environmental effects and to allow for the identification of necessary mitigation, if necessary within a range of possibilities"</u></p> <p>It is considered that it has taken so long to achieve a basic Baseline Assessment, that this has delayed and reduced the Councils ability to agree and develop agreed Landscape Proposals with the Applicant at this point in time.</p>	
LCC.LVR.7	Baseline environment	<p>Volume 3, Chapter 10 Landscape and Visual Resources (APP-123) correctly identified and describes all relevant landscape and visual resources – regarding landscape character, visual receptors and designated landscapes – which could be affected by the components of the Transmission Assets.</p>	<p>The Council agree that the Applicants have correctly identified and describes most relevant landscape and visual resources – regarding landscape character, visual receptors and designated landscapes - which could be affected by the components of the Transmission Assets.</p> <p>The Council considers that the Applicants have not adequately documented every aspect of the landscape, resulting in an underrepresentation of potential impacts within the Transmission Assets study areas. This remains a position of disagreement.</p> <p>In particular, this includes:</p> <ul style="list-style-type: none"> • Effects at Landfall especially during the construction period, which as understood 	Not agreed

Reference Number	Discussion point	Applicants' position	Lancashire County Council position	Status
			<p>could be over a protracted period, to what is a very well used and attractive aspect of the local areas recreational and associated commercial enterprises; landscape effects on ponds which are characteristic of general rural areas within this particular area of Fylde. These should be restored;</p> <ul style="list-style-type: none"> Certain properties are not noted for inclusion regarding visual effects, namely from Manor Drive, PRow south of Morecambe Substation and Caravan and Camping businesses within close proximity, whose business depends on an attractive visual outlook. 	
LCC.LVR.8	Future Baseline	<p>Volume 3, Chapter 10 Landscape and Visual Resources (APP-123) has provided a reasonable outline of the likely future baseline conditions in the absence of the Transmission Assets.</p> <p>The Applicants reiterate that the <i>Infrastructure Planning (Environmental Impact Assessment) Regulations 2017</i> requires that [emphasis added by the Applicant]:</p> <p><i>“an outline of the likely evolution thereof without implementation of the development as far as natural changes from the baseline scenario can be assessed with reasonable effort on the basis of the availability of environmental information and scientific knowledge”</i> is included within the ES.</p> <p>The Applicants refer to the outline provided in Section 10.7.6 of Volume 3, Chapter 10 Landscape and Visual Resources (APP-123).</p>	<p>The Council disagree that the Applicants have provided a reasonable outline of the likely future baseline conditions in the absence of the Transmission Assets.</p> <p>The Council considers that the Substation effects and effects on Landscape Character have not sufficiently been recognised or mitigated.</p> <p>The Council considers that the Applicant could affect further mitigation to significantly improve the future baseline in most instances at little cost. This has not been constructively addressed or acknowledged by the Applicant and therefore remains a disagreement.</p>	Not agreed

Reference Number	Discussion point	Applicants' position	Lancashire County Council position	Status
LCC.LVR.9	Scope of the Assessment	Volume 3, Chapter 10 Landscape and Visual Resources (APP-123) has adhered to the scope of the ES that was developed, and agreed to, in consultation with relevant statutory and non-statutory consultees; reporting on the impact of the onshore elements of the Transmission Assets on landscape character and on publicly accessible views during the construction, operation and maintenance and decommissioning phase.	The Council agree that the Applicants have adhered to the scope of the ES that was developed, and agreed to, during initial consultation with relevant statutory and non-statutory consultees, reporting on the impact of the onshore elements of the Transmission Assets on landscape character and on publicly accessible views during all phases. The Council considers the Applicant has been inflexible in developing, progressing and addressing issues raised from initial assessment.	Agreed
LCC.LVR.10	Scoping	The Applicants submitted a Scoping Report that described adequately the technical studies being undertaken to provide an assessment of any likely significant effects for the construction, operation and maintenance, and decommissioning phases of the Transmission Assets. Detail is provided in Table 10.7 of Volume 3, Chapter 10: Landscape and Visual Resources (APP-123), which outlines the comments raised by the Council, the Applicants' responses, and how these were addressed within the Environmental Statement (ES) chapter	<i>[The Council have not provided a response to the Applicants' position].</i>	No status
LCC.LVR.11	Study area	The study areas for each component of the Transmission Assets, determined in Volume 3, Chapter 10 Landscape and Visual Resources (APP-123), capture all potentially significant effects on the landscape and visual resources and designated landscapes. The Applicants note that the Council was consulted in 2023 and 2024 on the study areas (amongst other elements of the LVIA) for both the	The Council considers that Moderate effects should be more clearly detailed as an Annex to the main document, to enable a better assessment, as a natural progression of the project development.	Not agreed, but not material

Reference Number	Discussion point	Applicants' position	Lancashire County Council position	Status
		<p>Preliminary Environmental Information Report (PEIR) and the ES, following submission of the Scoping Report on 28 October 2022 to the Planning Inspectorate.</p> <p>No formal comments on the study areas were submitted following either the Scoping Report or the PEIR, prior to the submission of the ES by the Council.</p>		
LCC.LVR.12	Zone of Theoretical Visibility (ZTV) study	<p>The ZTV studies, undertaken as part of the LVIA, are appropriate and effective in determining which landscape and visual receptors are likely to be affected and merit detailed consideration in the assessment of effects attributable to the onshore substations, in combination with supporting fieldwork observations.</p> <p>The Applicants note that the Council was consulted in 2023 and 2024 regarding the proposed representative viewpoints, study areas, and visualisations for both the Preliminary Environmental Information Report (PEIR) and the ES, following submission of the Scoping Report on 28 October 2022 to the Planning Inspectorate.</p> <p>No formal comments on the study areas were submitted following either the Scoping Report or the PEIR, prior to the submission of the ES by the Council.</p> <p>Furthermore, the Applicant provided clarification on the methodology used for the ZTV in the Applicants response to comments made by Lancashire County Council (LCC) in their Local Impact Report (REP1-085) – see REP1-086 7.122 of Applicants' Response to Lancashire County Council Local Impact Report (REP2-039).</p> <p>The Applicants stand by this clarification.</p>	<p>The Council disagree that the Applicant provided clarification on the methodology used for the ZTV in the Applicants response to comments made by Lancashire County Council (LCC) in their Local Impact Report (REP1-085) – see REP1-086 7.122 of Applicants' Response to Lancashire County Council Local Impact Report (REP2-039).</p> <p>The Council considers that the Applicant refuses to acknowledge that Methodology was contradictory within their documentation.</p> <p>The Council considers it is usual to provide two ZTV's of both scenarios, for good practice.</p> <p>Notwithstanding the Council considers the night-time scenario should have been considered as separate headings within each element, as is usual within LVIA and that the lighting scenario has therefore been underplayed.</p> <p>The Council considers there is no information provided by the Applicant which sufficiently details the extent of night-time effects.</p>	Not agreed, but not material

Reference Number	Discussion point	Applicants' position	Lancashire County Council position	Status
LCC.LVR.13	Project design envelope	Volume 3, Chapter 10 Landscape and Visual Resources (APP-123) has identified, described and assessed the maximum design scenario in the EIA for relevant landscape and visual resources potentially affected by the Transmission Assets.	<p>The Council disagree that the Applicants have identified, described and assessed the maximum design scenario in the EIA for all relevant landscape and visual resources potentially affected by the Transmission Assets.</p> <p>Those outstanding include ponds from field areas which are not proposed for replacement, but which fundamentally form part of the intrinsic Landscape Character. The ridge-lines on which the Substations are proposed.</p> <p>Sufficient weighting has not been afforded to viewers from Manor Drive, from users of the Bridleway in proximity of the Morgan and Morecambe Substations, PRoW's south of the Morecambe Substation and local businesses' relying on the rural outlook (Caravan and Camping Parks).</p>	Not agreed
LCC.LVR.14	Assessment methodology.	The sensitivity criteria - covering value, susceptibility, integrity and capacity - for landscape and visual resources have been correctly identified and sufficiently described within Volume 3, Chapter 10 Landscape and Visual Resources (APP-123).	The Council disagree that the sensitivity criteria for landscape and visual resources have been correctly identified and sufficiently described in ES Chapter 10 (APP-123).	Not agreed, but not material
LCC.LVR.15	Assessment methodology	The methodology for assessment of landscape and visual resources has been undertaken in accordance with best practice guidance within GLVIA3 (Landscape Institute and IEMA, 2013), drawing upon other best practice guidance, where relevant. The Applicants reiterate that the landscape and visual impact assessment was prepared by Chartered landscape architects with extensive experience of delivering LVIA's for similar development and comparable infrastructure projects. These appropriately	The Council agree in general, that the methodology for assessment of landscape and visual resources has been undertaken in accordance with best practice guidance within GLVIA3 (Landscape Institute and IEMA, 2013), drawing upon other best practice guidance, where relevant.	Agreed
			The Council states however, that the Cumulative Effects, ZTV's and night-time areas of the LVIA are weak, that baseline	Not agreed, but not material

Reference Number	Discussion point	Applicants' position	Lancashire County Council position	Status
		qualified professionals were appointed to prepare this aspect of the DCO submission, on behalf of the Applicants, in accordance with recognised best practice guidance set out in the GLVIA3 and other relevant industry standards.	representations are poor, has been and remains insufficient, that there is a lack of honesty, underplaying of landscape character and use of language to mislead the reader and lack of commitment towards effective mitigation. There is insufficient acknowledgement of NCA (National Character Area) guidance on character .	
LCC.LVR.16	Assessment methodology	The magnitude of impact criteria for landscape and visual resources have been correctly identified and sufficiently described within Volume 3, Chapter 10 Landscape and Visual Resources (APP-123).	The Council disagree that the magnitude of impact criteria for landscape and visual resources has been correctly identified and sufficiently described in ES Chapter 10 (APP-123).	Not agreed
LCC.LVR.17	Assessment methodology	<p>The significance of effects upon landscape and visual resources has been correctly determined and sufficiently described within Volume 3, Chapter 10 Landscape and Visual Resources (APP-123).</p> <p>The Applicants consider that the approach of the LVIA to significance, within the context of the wider ES, remains robust and consistent with both the EIA Regulations and accepted industry guidance, namely the GLVIA3.</p> <p>GLVIA3 does not prescribe the exact threshold at which point a landscape or visual effect becomes significant, but it does require a transparent process to be followed, which considers the sensitivity of receptors, magnitude of impact, and sufficient descriptive text to support the final significance of effect. Furthermore, the threshold of Moderate adverse and below is a typical point at which landscape and visual effects are not considered significant. Paragraph 10.11.4.4 of the LVIA clarifies that effects assessed as being of 'moderate' significance are not automatically</p>	<p>The Council agree that the significance of effects upon landscape and visual resources has been correctly determined and sufficiently described in ES Chapter 10 (APP-123).</p> <p>The Council has no confidence (demonstrated by the reluctance to change or amend the stance by the Applicant over the last 6 months +) in either SoCG discussions and their written submissions or documentation.</p> <p>Furthermore, following ExA request during ISH2, that sub-EIA-significance-threshold effects are not automatically disregarded and have informed decisions on design, mitigation, and overall scheme evaluation, the Council remains concerned that these as well as other constantly repeated landscape and visual effects are not being addressed sufficiently.</p>	Not agreed

Reference Number	Discussion point	Applicants' position	Lancashire County Council position	Status
		<p>treated as EIA significant, but this does not mean they are disregarded. As explicitly stated in the LVIA, such effects are given appropriate weight in the assessment process. This includes informing judgements on scheme design, mitigation, and the balancing of likely effects in the context of decision-making. The risk of “underplaying” effects therefore is explicitly mitigated by the tiered approach adopted within the LVIA and ES, which distinguishes between the significance of effects for EIA purposes and the professional judgements around landscape sensitivity, susceptibility, and value. Moreover, those effects assessed as ‘moderate’ or approaching the threshold of significance are clearly identified and discussed to ensure transparency and to support a proportionate assessment and evaluation of potential environmental effect.</p>		
LCC.LVR.18	Assessment methodology	The assumptions and limitations of Volume 3, Chapter 10 Landscape and Visual Resources (APP-123) are fair and reasonable.	The Council disagree that the assumptions and limitations of ES Chapter 10 (APP-123) are fair and reasonable.	Not agreed
LCC.LVR.19	CEA scope	The list of projects screened into the Cumulative Effects Assessment (CEA) in the EIA is appropriate.	<p>The Council disagree that the Applicants have adequately screened into the CEA all relevant projects.</p> <p>The Applicant fails to recognise CEA effects of the two Substations from along the Bridleway and PRoW's and those effects alongside the Blue Field Solar Farm.</p>	Not agreed
LCC.LVR.20	CEA methodology	The assessment methodology for the CEA of landscape and visual resources has been undertaken in accordance with best practice guidance, as set in Section 5.4.9 Cumulative effects assessment Volume 1, Chapter 5:	The Council disagrees that the assessment methodology for the CEA has been undertaken in accordance with best practice guidance.	Not agreed

Reference Number	Discussion point	Applicants' position	Lancashire County Council position	Status
		Environmental assessment methodology (APP-034).	The Council considers insufficient weighting and documentation, as recommended in GLVIA3, and as noted for <i>LCC.LVR. 19</i> .	
LCC.LVR.21	CEA	Volume 3, Chapter 10 Landscape and Visual Resources (APP-123) has presented a comprehensive assessment of the potential cumulative effects that could arise from the Transmission Assets in combined with other relevant projects, within the LVIA's studies areas. This assessment has included an assessment on relevant landscape and visual resources, during the daytime and night, and during the construction/decommissioning phase and the operation/maintenance phase.	<p>The Council disagree that the Applicants have presented a comprehensive assessment of the potential cumulative effects that could arise from the Transmission Assets in combined with other relevant projects, within the LVIA's studies areas.</p> <p>The Council considers that as the timelines for CEA of both the two Substations and the Bluefield Solar Farm are unknown, it is difficult to represent other than indicative assessment.</p> <p>Notwithstanding, the Council does not consider the Applicant has considered a worst-case scenario, either at construction or at completion and has not mitigated sufficiently as a result.</p>	Not agreed
LCC.LVR.22	CEA	<p>Volume 3, Chapter 10 Landscape and Visual Resources (APP-123) has assessed that significant effects (in EIA terms), would arise from the Transmission Assets in combination with other schemes during the short-term* construction phase on the following landscape and/or visual resources:</p> <p><u>Landscape Character</u></p> <p>No significant landscape effects are identified as arising from the components of the Transmission Assets in combination with other schemes during the short-term construction phase.</p> <p><u>Visual Receptors</u></p> <ul style="list-style-type: none"> People using PRoWs within 1km of the corridors of the export cable or 400 kV cable that would cross the cable corridor, be in 	<p>The Council disagree that the Applicants have fairly identified the significant effects (in EIA terms) arising from the Transmission Assets in combination with other schemes during the short-term construction phase on the listed landscape and visual receptors.</p> <p>The phrase 'short-term' should be removed and is objected to in the Applicants position, as short term is considered incorrect for a development, which could take place for 8 years +</p> <p>It is strongly disagrees visual receptors would not incur significant visual effects over the potential construction period, especially in a worst-case scenario.</p>	Not agreed

Reference Number	Discussion point	Applicants' position	Lancashire County Council position	Status
		<p>proximity to the temporary construction activities and/or pass nearby CEA developments.</p> <ul style="list-style-type: none"> Occupiers of residential properties at Bridge Farm, Bridge Hall Farm, Moss Side Farm, The Old Dairy, Hillock Cross Farm, Savick Brook Farm and Marsh Farm – temporary and reversible onshore cable (export cable or 400 kV cable). <p>* The Applicants note that it is likely that construction activities would be undertaken in <i>short-term stages</i> along the onshore export and 400 kV grid connection cable corridors rather than continuously during the maximum 66-month construction period.</p>		
LCC.LVR.23	Assessment of effects	<p>Volume 3, Chapter 10 Landscape and Visual Resources (APP-123) provides an assessment of the potential residual effects that could arise from the Transmission Assets, which has included an assessment on relevant landscape and visual resources, during the daytime and night, and during the construction / decommissioning phase and the operation / maintenance phase.</p> <p>The Applicants have consistently communicated what is achievable within the defined parameters of the Project, as evidenced throughout their submissions to the Examination.</p> <p>The Applicants acknowledge the nature of engagement that has taken place since the submission of the DCO application, noting that meaningful dialogue is most effective when all parties approach the process constructively, prepared to exchange perspectives and explore options through the structured engagement opportunities provided, rather than repeating</p>	<p>The Council strongly disagree that the Applicants have assessed the potential residual effects of the Transmission Assets, including impacts on relevant landscape and visual resources during both day and night, and across construction, decommissioning, operation, and maintenance phases.</p> <p><u>The Council has significant concern</u> that many residual landscape and visual effects could be better and sufficiently addressed by further relatively straightforward and non-onerous mitigation, that this has been communicated to the Applicant over the last 6 month period, but has not been addressed. There is therefore ongoing concern that the Applicant will not address these concerns post consent.</p> <p>There is concern in this process whereby comments are repeatedly communicated back to the Applicant, whilst the Examiner in most cases does not see and is not aware of this constant attempt at dialogue and constructive</p>	Not agreed

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		positions set out in previously written representations.	recommendations, the lack of acknowledgement and addressing of concerns.	
LCC.LVR.24	Assessment of potential effects during construction	<p>Volume 3, Chapter 10 Landscape and Visual Resources (APP-123) has assessed that short-term significant effects (in EIA terms) would arise from Transmission Assets during the construction phase on the following landscape and/or visual resources:</p> <p><u>Landscape Character</u></p> <ul style="list-style-type: none"> LCA 19a: Coastal Dunes – Fylde Coastal Dunes (landfall); and LCA 15d: Coastal Plain – Fylde (onshore substations) <p><u>Visual Receptors</u></p> <ul style="list-style-type: none"> Viewpoint 1 bridleway BW0505016 south of Morgan onshore substation site; Viewpoint 3 bridleway BW0505016 west of Morgan onshore substation; Viewpoint 6 footpath FP050503 south of Morecambe onshore substation site; Sequential effects on people using PRoW BW0505016, FP050503 and FP050504; People using beach; People using Blackpool Road Recreation Ground; People using PRoW BW0502012, BW0502013, BW0502016, BW0503012, FP050302, FP05010011, FP050304, FP050305, FP050502, BW0509012, FP00905, FP070907 and FP0709010 (export and 400 kV cables); 	<p>The Council disagree that the Applicants have fairly identified the significant effects (in EIA terms) arising from the construction phase of the Transmission Assets on the listed landscape and visual receptors.</p> <p>The phrase 'short-term' should be removed and is objected to in the Applicants position, as short term is considered incorrect for a development, which could take place for 8 years +.</p> <p>The Applicant to include significant effects to Freshfield Farm and Green Bank Farm.</p> <p>The Council emphasises that the substations will have a significant impact on the surrounding landscape, affecting residents, workers, and visitors in their local vicinities, as described in the Council's written submissions at Deadlines 1 to 4. Also, in Council responses to Applicants on submission documents over this period.</p> <p>The Applicant should specifically set out the effects on Landscape Character, particularly in the Substation areas and not over generalise.</p> <p>These include:</p> <ul style="list-style-type: none"> Loss to Openness and Views Loss to rural character, field pattern, trees and ponds Loss of tranquillity <p>Loss of Recreational Assets for wellbeing and health</p>	Not agreed

Reference Number	Discussion point	Applicants' position	Lancashire County Council position	Status
		<ul style="list-style-type: none"> People using National Cycle Route 62 at Hillock Lane (export cable); and Occupiers of residential properties at Bridge Farm, Bridge Hall Farm, Moss Side Farm, The Old Dairy, Hillock Cross Farm, Savick Brook, Farm and Marsh Farm (export and 400 kV cables) <p>No other significant effects on landscape character or visual receptors would arise during the construction of the Transmission Assets.</p>		
LCC.LVR.25	Assessment of potential effects during operation	<p>Volume 3, Chapter 10 Landscape and Visual Resources (APP-123) has assessed that long-term significant effects (in EIA terms) * would arise from the Transmission Assets during the operation phase on the following landscape and/or visual resources:</p> <p><u>Landscape Character</u></p> <ul style="list-style-type: none"> LCA 15d: Coastal Plain – Fylde (Year 1 before landscape mitigation planting has established). <p><u>Visual Receptors</u></p> <ul style="list-style-type: none"> Sequential effects on people using PRoW BW0505016, FP050503 and FP050504 (Year 1 before landscape mitigation planting has established). <p>No other long-term significant effects on landscape character or visual receptors would arise during the operation of the Transmission Assets</p> <p><i>* For the purpose of the LVIA, any effects with a significance level of moderate or less are not considered to be significant, as detailed in Volume 3, Annex 10.4: Landscape and visual impact assessment methodology (APP-127).</i></p>	<p>The Council disagree with judgments presented by the Applicants in their assessment of effects.</p> <p>The Council presents its conclusions in the <i>Local Impact Report</i> (REP1-085), and the Council's responses to ExQ1 (REP3-084) and ExQ2 (REP5-173). The Council's judgments are set out below and should be considered alongside any response to the Applicant over the previous 6 month + period.</p> <p><u>Landscape Character</u></p> <p>LCA 15d: Coastal Plain – Fylde – Major Adverse (significant) at Year 1 and 15.</p> <p><u>Visual Receptors</u></p> <p>Viewpoint 1 bridleway BW0505016 – Major Adverse (significant) at Year 1 and 15.</p> <p>Viewpoint 2 Strike Lane – Major Adverse (significant) at Year 1 and 15; if the view was relocated to the end of Strike Lane, as proposed in REP1-085 and REP3-084.</p> <p>Viewpoint 3 bridleway BW0505016 – Major Adverse (significant) at Year 1 and 15.</p>	Not agreed

Reference Number	Discussion point	Applicants' position	Lancashire County Council position	Status
			<p>Viewpoint 4 Parrox Lane – Moderate adverse (not significant) at Year 1 and 15.</p> <p>Viewpoint 5 footpath FP0509005 – Moderate adverse (not significant) at Year 1 and 15.</p> <p>Viewpoint 7 Kirkham Bypass – Moderate adverse (not significant) at Year 1 and 15.</p> <p>Viewpoint 12 bridleway BW0505016 – Major Adverse (significant) at Year 1 and 15; where users of the bridleway are closest to Morgan substation.</p> <p>It is considered insufficient to refer solely to Viewpoints and not to general effects.</p> <p>These would include:</p> <ul style="list-style-type: none"> • Loss of Openness and Views, particularly to Green Belt areas in which Substation areas are proposed. • Loss to rural and landscape character, field pattern and particularly ponds (which should be restored in character with the existing landscape). • Loss of tranquillity, particularly on PRow's and Bridleway in vicinity of the Substations. • Views of Scale and Form of industrial style built form and associated paraphernalia, out of landscape character with openness, views characteristic of the Green Belt and rural agricultural area. • Associated urban elements introduced to the rural area, such as 3m industrial style fencing and an access road at a significantly larger scale than the local A roads. 	
Outline Design Principles, Outline Mitigation and Landscape Proposals				

Reference Number	Discussion point	Applicants' position	Lancashire County Council position	Status
LCC.OMLP.1	Measures (commitments)	The mitigation measures and monitoring outlined in Volume 3, Chapter 10 Landscape and Visual Resources (APP-123), the Commitments Register (document reference F1.5.3), and the Outline Landscape Management Plan (document reference J2) are appropriate in the environmental mitigation of potential effects arising from the onshore substations.	<p>The Council disagree with the Applicants' position, considering the proposed mitigation and monitoring measures to be insufficient for addressing potential environmental effects from the onshore substations. The Council has little confidence that the Applicant will address landscape and visual concerns post consent, as these have been raised over the last 6 months+ in responses to the Applicant and not as much as acknowledged by the Applicant, other than in conversations, which are not documented.</p> <p>There have been no changes by the Applicants to Documents and Drawings.</p> <p>The Council considers that further off site mitigation measures are required to help reduce landscape and visual effects. These include planting up hedgerows which currently exist as post and wire, or are gapped, planting of rough open areas adjacent to Manor Drive to reduce direct visual effects on the Morgan Substation and particularly the new access area (an option for advanced planting with quick growing species could be considered and agreed) and planting which actually replicates landscape character, rather than emphasises the alien built form.</p> <p>Equally, measures being 'indicative' regarding cut and fill and current performance, again, offer little guarantee and confidence that these measures would be undertaken to improve the visual outlook of the Substations.</p> <p>The finer detail such as species is not an issue, it is generally the fundamental design issues and concepts which are not yet resolved.</p>	Not agreed

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LCC.OMLP.2	Outline Management Plans	The measures set out in the Outline Landscape Management Plan (document reference J2) are secured in the draft DCO (document reference C1) and are appropriate with regard to proposed mitigation measures and monitoring.	<p>The Council disagree with the Applicants' position, considering the proposed mitigation measures and monitoring – submitted in response to ExQ 13.1.6 (REP-082) – to be insufficient for addressing potential environmental effects from the onshore substations. The ongoing engagement programme on the outline Design Principles and related documents aims to resolve this disagreement.</p> <p>The Council reiterates that the substations would significantly affect the surrounding landscape character, impacting openness and visual elements of the Green Belt, rural and agricultural field areas demarcated by hedgerows and its tranquillity.</p> <p>This would be replaced with a stark built form of a scale and presence strongly out of character, introducing large scale urban elements, which weaken the appearance and purpose as a Green Belt area.</p> <p>Pond restoration and replacement should be in character with the existing landscape, i.e. frequent and scattered within field areas as currently exists.</p> <p>Visual effects would continue to impact residents, businesses, visitors, recreational users and could be further mitigated.</p>	Not agreed
LCC.OMLP.3	Outline Design Principles	The oDP (document reference J3) sets out the design processes for all aspects of the Projects, following best practice guidance.	In its response to the Examining Authority's written question ExQ 13.1.5 (REP3-082), the Council states that:	Not agreed
LCC.OMLP.4	Outline Design Principles	The oDP (document reference J3) is a certified document prepared to support the governance of	<i>"...the Outline Development Principles are high-level and generic and that any such document</i>	

Reference Number	Discussion point	Applicants' position	Lancashire County Council position	Status
		post consent design and inform the discharge of relevant requirements with specific reference to Section 5 and 6.	<i>should be informed by more detailed information, consultation and creation of a well-reasoned design strategy."</i>	
LCC.OMLP.5	Outline Design Principles	The Project Level Design Principles and Design Codes – set out in Sections 5 and 6 of the oDP (document reference J3) have been prepared in consultation with the Council and are agreed.	The comments above refer to an iteration prior to OLMP3, current ODP (14.10.25 response to Applicant).	
LCC.OMLP.6	Outline Design Principles	The indicative post consent programme – set out in Section 6 of the oDP (document reference J3) – establishes a satisfactory process to support delivery of good design.	The Council has however strong disagreement with the current ODP and consider the document bias and unrepresentative of the concerns LCC has raised over the last 6 month + period.	
LCC.OMLP.7	Outline Design Principles	The appointment of a Design Champion for each Applicant is supported and will benefit the delivery of good design, post consent.	As such, it cannot be accepted and presents real concerns that landscape and visual issues would be addressed post consent.	
LCC.OMLP.8	Outline Design Principles	The commitment to the preparation of a Compliance Report to be submitted in support of Requirements discharge is supported.	The Council considers that as the area is highly valued and has purpose as Green Belt the Applicants efforts should be more than 'adequate' as stated in their position.	
LCC.OMLP.9	Outline Design Principles	It is not considered necessary to impose an Independent Design Review Panel (IDRP) on the Council at this stage. Any requirement for an IDRP should be determined post-consent by the discharging authority, in consultation and agreement with the Applicants. The Applicants are committed to continued engagement with the discharging authority, FBC, as part of the post-consent design process. The oDP establishes governance protocols and processes to support FBC in discharging Requirement 4 of Schedules 2A and 2B (of the dDCO) in relation to substation design with an indicative approach to a design development		

Reference Number	Discussion point	Applicants' position	Lancashire County Council position	Status
		programme, enhanced Project Level Design Principles and Design Codes – see Section 6 of the oDP.		