

**APPLICATION BY MORGAN OFFSHORE WIND LIMITED AND  
MORECAMBE OFFSHORE WINDFARM LIMITED FOR A  
DEVELOPMENT CONSENT ORDER FOR THE MORGAN AND  
MORECAMBE OFFSHORE WIND FARMS TRANSMISSION ASSETS**

**DEADLINE 7 SUBMISSION – CLOSING STATEMENT**

**BY LANCASHIRE COUNTY COUNCIL**

**29<sup>th</sup> OCTOBER 2025**

## **1. Introduction**

- 1.1. This submission sets out Lancashire County Council's (LCCs) Deadline 7 submission, its Closing Statement for the Development Consent Order application for the Morgan and Morecambe Offshore Windfarm Transmission Assets Generation Assets ('the Scheme').
- 1.2. The following sections set out the final overall position in relation to each of LCCs areas of responsibility. Comments on the Draft DCO are included where appropriate under each heading.

## **2. Hydrology and Flood Risk**

- 2.1. LCC is the Lead Local Flood Authority (LLFA) within the area of the Council. The LLFA is satisfied that all requirements at this stage relating to surface water flood risk, surface water drainage and sustainable drainage systems are acceptable in principle, subject to the provision of further details at later stages of the development, as reflected in the Lancashire County Council Statement of Common Ground (REP6-125).
- 2.2. With regards to the draft Protective Provisions for the LLFA, LCC is not currently able to agree these and therefore cannot consent to the disapplication of Section 23, and subsequently Sections 24 and 64, of the Land Drainage Act 1991 (as amended).
- 2.3. Whilst the LLFA has continued to negotiate with the Applicants on an agreed draft of these Protective Provisions, there remain outstanding points of disagreement specifically relating to the LLFA's powers of entry and the indemnity provisions.
- 2.4. Negotiations are actively continuing between the respective parties' legal representatives. However, given the current timescales, it is unlikely that these issues will be fully resolved by Deadline 7 (29th October 2025). In the event agreement cannot be reached by Deadline 7, the LLFA and Applicants will continue negotiations and provide an update to the Secretary of State.
- 2.5. In the event that the issues remain unresolved Article 7(1)(b) (relating to byelaws) and Article 7(1)(d) relating to the disapplication of section 23 of the Land Drainage Act 1991 (as amended) concerning obstructions in watercourses and section 30 concerning authorisation of drainage works in a ditch will be removed. However, the LLFA wishes to progress negotiations with a view to resolving the outstanding issues outlined above"

## **3. Onshore Ecology and Nature Conservation**

- 3.1. LCC considers that the ecological issues arising from the proposal include:
  - The adequacy/completeness of the ecological surveys and assessments undertaken;

- Measures to avoid or minimise ecological impacts;
- Implications for statutory designated sites, their qualifying features and functionally linked land (including the requirement for the determining authority to undertake a Habitats Regulations Assessment);
- Implications for Biological Heritage Sites;
- Implications for irreplaceable habitats such as sand dunes;
- Habitats of Principal Importance;
- Hedgerows;
- Mature trees and their root protection zones;
- Protected species (including licence requirements);
- Species of Principal Importance and their habitat;
- Important and Sensitive Bird Areas;
- Notable Invertebrates;
- Habitat connectivity;
- Delivery of biodiversity gains as required by national policy;
- Compliance with legislation, policy and best practice;
- Consideration of Lancashire's emerging Local Nature Recovery Strategy; and
- Ecological impacts arising from wider environmental effects such as hydrological changes, pollution, air quality etc.

3.2. There are a number of ecology related matters on which LCC and the applicant have not agreed as set out in the Lancashire County Council Statement of Common Ground (REP6-125). Details of the outstanding matters are set out below:

#### 1. Gaps in Ecological Data

3.3. There are gaps in ecological survey data. LCC is not able to establish that these are immaterial. Owing to access constraints, 8.5% of the Onshore Order Limits area 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 to support protected species (such as bat roosting features) presence of individual species etc. This could also affect the accuracy of biodiversity gain calculations.

3.4. 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. However, the Examining Authority may take the view that impacts on such species can be addressed post-examination.

3.5. The Examining Authority will need to be satisfied that there is sufficient information to inform the environmental assessment, associated mitigation/compensation measures and the Examining Authority's own statutory

obligations, such as those stated within the Conservation of Habitats and Species Regulations 2017.

## 2. Avoidance of Ecological Impacts

- 3.6. It needs to be clearly demonstrated that the mitigation hierarchy has been applied to all elements of the scheme. The Examining Authority will need to be satisfied that there is no satisfactory alternative location or design solution with a reduced ecological impact. In this respect, where there could be impacts on important sites and habitats (such as Biological Heritage Sites and irreplaceable habitats) it should be clear what other options were explored and why they were not feasible. Wherever alignment of cable construction corridors and siting of infrastructure and working areas cannot be adjusted to avoid impacts on sensitive sites, habitats, features and species, then directional drilling or other approaches that avoid open trenching should be considered.
- 3.7. LCC is not able to establish that there will be no significant residual effects on ecological receptors, such as species and habitats of principal importance or irreplaceable habitats. Further information would be necessary to demonstrate no significant residual effects.

## 3. Requirements for Biodiversity Gains

- 3.8. Whilst a mandatory 10% biodiversity net gain does not apply to this application, the requirements of national policy should be met. Section 4.6 of National Policy Statement for Energy (EN-1) includes requirements for biodiversity gains. Whilst it may be possible to agree details post-examination, the Examining Authority will first need to be satisfied that these requirements can be met.
- 3.9. Table 3 of the applicant's Biodiversity Benefit Supporting Statement provides a summary Whole Order Limits BNG Assessment. Whilst it is recognised that the final footprint of habitat losses may not cover the whole of the order limits, the results given in that document indicate significant biodiversity losses, which would not meet the requirements of relevant national policies.
- 3.10. Although the applicant has used the latest version of the DEFRA Biodiversity Metric, it 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. Restricting biodiversity gain calculations to above ground permanent infrastructure is not consistent with the approach taken for some other national infrastructure projects.
- 3.11. Uncertainty around conflicts between the proposed ecological mitigation and aviation risk appear to remain. As long as the requirements of legislation, national policy and recognised best practice guidance are met, then mitigation outside of wildlife hazard management zones could be provided.

#### 4. DCO Requirements

- 3.12. If the Examining Authority is minded to recommend approval of the proposed scheme, then DCO requirements will need to ensure that biodiversity gains will be provided in accordance with national policy.
- 3.13. A detailed Code of Practice and supporting management plans will need to provide robust, precise and enforceable management and mitigation measures for the potential environmental impacts during the construction phases. It will need to be ensured that the final documents provide comprehensive details to address all of the matters outlined in LCC's Local Impact Report and other submissions to the examination.

#### Ecology Matters Deferred to Others

- 3.14. LCC is content to defer to Natural England in relation to:
- Matters relating to licensable impacts on protected species which are to be addressed when considering a letter of no impediment; and
  - Potential impacts on statutory designated sites and functionally linked land as well as requirements for Habitats Regulations assessments.
- 3.15. Lancashire County Council is content to defer to Fylde Borough Council, their ecology advisor and sand dune specialists in relation to potential impacts on sand dune habitats and any implications for the Fylde Sand Dunes Project.

#### **4. Landscape and Visual Resources**

- 4.1 The Lancashire County Council Statement of Common Ground (REP6-125) clearly indicates the disagreement regarding the level and method of consultation, particularly post application. Constructive dialogue has at all times been sought by LCC. However this has been difficult due to the need to meet the timescales imposed by the NSIP process.
- 4.2 LCC has queried the poor baseline information provided. It has taken crucial time and effort obtaining more detailed information, such as levels, topography, cross-sections and sections and aspects of viewpoints. The 'Rochdale Envelope' and NSIP policies it is considered have been interpreted to suit the Applicants argument, and clear information has not been provided to aid assessment.
- 4.3 The Applicant repeatedly quote aspects from the LVIA. Whilst LVIA is accepted as a known and accepted process, it does not cross relate to the harms created by the proposed development, neither does it determine the full extent and method of mitigation required. Rather use the professional to engage, develop, explore and propose solutions to concerns raised, this has not happened.

- 4.4 The Applicant has failed to demonstrate an understanding of the Landscape Character. In the wider area this includes for example the restoration of field ponds, that whilst they may not support great crested newts or water voles, are nevertheless an intrinsic part of the landscape character and ecological capital within the Fylde area, as seen on any topographical or OS mapping and as noted in several instances within the NCA (National Character Area) 32 Guidance relevant to the area.
- 4.5 The primary area of concern is the landscape and visual impacts of the two substation sites. Again mitigation should aim to replicate and strengthen existing landscape patterns. This entails not a random assortment of ponds in one tiny area, but scattered throughout the adjacent fields as is the existing pattern; woodland planting comprising irregular blocks, not a thin line which further emphasises the location and presence of the built form and development; strengthening of hedgerows, both existing and the re-establishment and replacement of post and wire fence boundaries, particularly where this is of benefit to reducing visual impacts from Public Rights of Way (PRoW) south of the Morecambe substation. Considered, strategic and relatively minimal off site planting, which helps to reduce visual impacts for those living closest to the site or relying on views for their business USP, or helps maximise levels, gradients and planting on site by positioning attenuation ponds off site. The NPS's suggest off site mitigation as a means of achieving better integration and mitigation yet this has not been proposed.
- 4.6 There is insufficient detailing of both Landscape and Visual Cumulative Effects; particularly the impacts of two very large scale substation sites in such close proximity, alongside an unknown timeline for the Bluefield Solar Farm. The two substations so close together compound visual and landscape effects, particularly for those users of the Bridleway and PRoW, yet this has not been acknowledged. The loss of tranquillity to two areas is doubly manifested.
- 4.7 There is therefore very real and genuine concern for post consent development following this process over the last seven months. There is concern that a Design Champion is not independent, that an Independent Design Review panel is essential, to guide the process. There is concern that landscape and visual issues for those living and working within the immediate area would not be sufficiently addressed, to meet what should not be 'Basic' but 'Better' standards of mitigation.
- 4.8 Updated comments on the Landscape and Visual Resources section of the Lancashire County Council Statement of Common Ground (REP6-125) are attached in Appendix A.

## **5. Green Belt and Area of Separation**

- 5.1 The proposed development affects two areas of land that are designated as Green Belt. The County Council accepts that the development of the cable route

would have limited impact on the Green Belt due to the temporary nature of the construction activity and maintenance of openness once the construction activities have been completed. It would however be important to consider carefully the timing and phasing of cable route construction so that the impacts of this element of the development on the Green Belt can truly be considered short term and temporary.

- 5.2 The main issue with regards to the Green Belt relates to the proposed substations. The County Council considers that the combined effect of the two substations on the Green Belt will be significant due to their scale, volume and permanence. By default these areas would in the future baseline constitute Grey Belt and lead to further development with irretrievable loss of the initial Green Belt area. The NPPF recognises that elements of many renewable energy projects will comprise inappropriate development where developers will need to demonstrate very special circumstances if such projects are to proceed. The County Council considers that this policy must apply to the substation elements of this proposal given their scale and impacts on openness.
- 5.3 The County Council recognises that the overall scheme would have wider environmental benefits associated with the production of energy from renewable sources and that these factors can be very special circumstances. However, in this case it is considered that it would have been reasonably possible to propose a scheme with the same benefits but with the substations located outside of the Green Belt or in other Green Belt locations which would have been less harmful to openness (such as adjacent to the existing Penwortham substation). In the County Council's view the failure to fully address this issue significantly dilutes the applicant's very special circumstances case as it would have been possible to propose a scheme having the same benefits but with lesser impacts on Green Belt than the current proposal. The County Council also considers that the design of the development could have been further modified to reduce impacts on the Green Belt as the decision to construct two separate but closely located substations increases the impacts on the openness of the area of Green Belt to the south of Kirkham.
- 5.4 Equally in accordance with requirements of the NPS's there are requirements that Residual Effects should be avoided, reduced, and mitigated, to 'minimise' harm as far as possible. It is considered that this has not yet been achieved. Mitigation proposals are currently considered 'Basic'. The County Council would like to achieve 'Better', with an understanding that 'Best' should always be striven for nevertheless.
- 5.5 Updated comments on the Green Belt and Area of Separation section of the Lancashire County Council Statement of Common Ground (REP6-125) are attached in Appendix A.

## **6. Land Use and Recreation**

- 6.1. LCC's main concern in relation to land use and recreation relates to the impact on Public Rights of Way (PRoW). LCC advises that the final position in relation to PRoW is not agreed. The outstanding concerns and measures raised within the Outline Public Rights of Way (PRoW) Management Plan (REP6-087) are yet to be agreed. The principal arrangement for the access off Lytham St Annes Way and the use of Anna's Road is not supported by the LCC Public Rights of Way team. While LCC does not rule out the possibility of an agreement, it does not reflect LCC's current position.

## **7. Historic Environment**

- 7.1. As can be seen from Lancashire County Council's Statement of Common Ground (REP6-125) the Historic Environment Team (HET) is content with the relevant supporting documentation, and which was compiled in consultation with the HET, that has been submitted by the applicant. Although they demonstrate a good understanding of the process that needs to be followed there remains a concern that there has been a reluctance to implement the strategy to its fullest and at the earliest opportunity in the examination stage. For example, where the limited intrusive archaeological work (trial trenching) that has been undertaken, only 139 out of 227 proposed trenches (See Programme of trial trenching and geoarchaeological investigation, RPS, May 2025) were actually completed in 2024, with no attempt to complete the remaining 88 unexcavated trenches in 2025. Furthermore, the HET still awaits those works that were completed prior to August 2024 to have been properly reported. It was only very recently (24/10/2025) that the HET received information on the amount of work that remains outstanding, in the form of a proposed trial trenching plan that shows that a further 374 trenches, 73% of the proposed total when the 139 that have been excavated are included, still to be excavated.
- 7.2. The HET is of the opinion that their ability to reach an informed and reasoned decision on the likely impact of the proposals on archaeological interests has not been greatly improved by the information currently supplied by the applicant.
- 7.3. It remains to be seen, but when bad weather (a more than likely winter occurrence in the North West), reporting timeframes (which should be expected to take as long as the site work) and the preparation of further Written Schemes of Investigation, as likely to be required by the DCO are taken into consideration, it should be recognised that the potential risk of delays to the construction programme are real.

## **8. Traffic and Transport**

- 8.1. The comments below provide the Local Highway Authority's (LHA) closing statement on the highway impacts of the proposed project. These comments are an update to Section 8 (Highways Impacts) of the Local Impact Report (REP1-085) by Lancashire County Council (LCC) dated 20<sup>th</sup> May 2025 and Appendix C (LHA Comments) of the LCC Post Hearing Submission (REP4-136) dated 8<sup>th</sup> August 2025.

### Key Updates

- 8.2. Following the submission of LHA comments at Deadline 4, a series of workshops between the Applicants and the LHA have taken place to obtain necessary clarifications and proposals to mitigate the impacts of the development. While these discussions have aided in addressing issues related to accesses and HGV routing, there is still an area of disagreement, pertaining to the Outline Construction Traffic Management Plan (OCTMP) that is discussed under paragraph 8.7 below. This is also disagreement with wording within the draft DCO that is discussed under paragraph 8.12.

### Compound Accesses

- 8.3. All of the accesses proposed within the Outline Highway Access Management Plan (OHAMP) (REP6-117) are acceptable in principle to the LHA, subject to detailed design, satisfying design standards, including safety audit. The access drawings within the OHAMP include the visibility splays, which should be protected by a suitably worded Requirement, for the duration of the projects. The detailed design, construction and reinstatement of the accesses should be delivered under a signed Highways Act agreement. Table 1.1 of Appendix B provides the LHA's review of the proposed accesses.

### Routing Strategy

- 8.4. The LHA have reviewed the latest information pertaining to the proposed highway routes to be used by construction HGVs to identify whether the routes are safe and suitable for use by HGVs. The applicants have used surveyed carriageway widths (at 50m intervals) to validate ordnance surveys and have provided swept path analysis of the proposed routes using HGVs with wing mirrors. This information has assisted in identifying the suitability of the routes, the extent of constraints and suitable mitigation measures that are deliverable within land controlled by the applicant or the LHA.
- 8.5. With consideration for the information provided, the LHA consider that the proposed routing strategy with the migration and management measures proposed within the OCTMP, are acceptable in principle, subject to comprehensive surveys along the full length of all corridors proposed to be used to inform the detailed design, satisfying design standards, and safety audits. The detailed design, construction and reinstatement of any works on highway maintainable at public expense should be delivered under a signed Highways

Act agreement. Table 1.2 of Appendix B provides the LHA's review of the proposed highway routes.

### Construction Traffic Management Plan

- 8.6. The LHA are generally satisfied with the majority of the principles within the OCTMP, as currently proposed. The latest version of the outline CTMP was provided to the LHA on 27<sup>th</sup> October 2025 and includes most of the LHA's amendments. The applicant has confirmed that this version will be submitted at Deadline 7. However, there is disagreement regarding the LHA resource required and how it will be provided, discussed in detail below.

### Morgan and/or Morecambe Highways Support Officer

- 8.7. Prior to commencement of construction or approval of any required details (design or documents), including the CTMP(s), the applicants would provide funding to LCC as LHA, for the provision of a Morgan and/or Morecambe Highway Support Officer (M&MHSO). The funding shall be sufficient to support a full LCC post, at Grade 9, for the duration of the projects. The M&HDSO will address the requirement for ongoing collaborative work, required to ensure the best management and successful delivery of projects in line with the CTMP(s).
- 8.8. The remit of the M&MHSO shall be solely dedicated to the projects, to monitor the construction impacts of the project, (including the development), in so far as they relate to the Local Highway Network for the duration of construction (including agreement of initial brief for highway inspection and through to delivery of highway rectification works post-project delivery) whose duties shall include:
- a) Liaison with the Developer and its appointed Contractor;
  - b) Attendance at highways liaison meetings (whether held at the Developer's, the Contractor's, the County Council offices, or remotely);
  - c) Conduit between the projects and the relevant Parish Councils (as suggested within the OCTMP by the applicants);
  - d) An option to be based part-time at the Contractor's offices;
  - e) Provision of the Approval and Consultation Services in accordance with the Service Level Agreement (including support service for the approval of a Preparatory Works Scheme(s) and/or Emergency Works Scheme and/or Repair Works Scheme(s))
  - f) Attendance at site inspections (including pre-commencement works and surveys, condition surveys and inspection of works);
  - g) Acting as first point of contact for any highways matters and facilitating the progress of the Morgan and Morecambe Offshore Wind Farms: Transmission Assets Project within the County Council's administrative area;
  - h) Reviewing the contractor's compliance monitoring with all highway matters relating to the Morgan and Morecambe Offshore Wind Farms: Transmission Assets Project;

- i) Reporting internally within the County Council on the Morgan and Morecambe Offshore Wind Farms: Transmission Assets Project's progress;
- j) Providing assistance on surveys or any designs prior to submission for approval (requiring the officer to be in place (employed) prior to any such submission); and
- k) Such other duties as are agreed by the Parties (acting reasonably).

8.9. Whilst the applicants have acknowledged the requirement for the above role, there is currently disagreement with the mechanism for securing and level of funding to be provided. The LHA require funding for a full-time post, at LCC Grade 9 level (£40,777 to £46,142 – current salary scales, future national salary scales to be followed), for the duration of the projects.

8.10. The mechanism for provision of funding should be through an appropriate resource agreement, with annual funding being provided in advance. This is to ensure an appropriate long-term resource can be secured. Without this resource, there are great risks that routes will not be maintained to ensure they can satisfy the needs of the projects. This will result in likely safety issues over corridors, impacting upon the project's programme and other highway users, with the risk of a potential road closure on some of the constrained rural routes. Funding through a Planning Performance Agreement (PPA) (as currently proposed by the applicant) is not supported by the LHA as there is no guarantee of funding to satisfy the required duties (as described within paragraph 1.8), notwithstanding the significant difficulties in being able to attract an additional (new) officer resource to undertake the tasks. LCC does not operate in arrears for a project specific role, in which the PPA would provide, notwithstanding any issues or disagreements.

8.11. The approach required by the LHA has been applied, controlled via planning condition for another "non-highways" multi-district wide project relating to the improvement/refurbishment of key water service infrastructure (United Utilities HARP project). A similar full-time post is vital for Morgan and Morecambe to ensure the project can be delivered safely and effectively, without overburdening the LHA in overcoming development related issues, including network management, maintenance, reliability and safety.

#### Draft Development Consent Order (DCO)

8.12. The LHA have suggested additional text to the applicant, to be included within Article 10 and Requirement 10 of the draft DCO, for clarity. The inclusion of the additional text has not been agreed by the applicants, but it is the view of the LHA that it should be included. The additional text is provided in *italics and underlined* below.

Article 10:

Power to alter layout etc. of streets

**10.—** (1) Subject to paragraphs (2) and (3), the undertaker may, in so far as may be expedient or necessary for the purposes of or in connection with constructing, operating and maintaining the authorised project alter the layout of any street and, without limitation on the scope of this paragraph, the undertaker may—

- (a) alter the level or increase the width of the street including any kerb, footway, cycle track or verge; and
- (b) make and maintain passing place(s).
- (2) The undertaker must restore any street that has been temporarily altered under this article to the reasonable satisfaction of the street authority.
- (3) The powers conferred by paragraph (1) must not be exercised without the consent of the street authority and must be exercised under a signed Highway Act agreement.
- (4) Paragraphs (2) and (3) do not apply where the undertaker is the street authority for a street in which the works are being carried out.
- (5) Any works subject to paragraph (1) must satisfy all individual user needs, highway safety and design standards.
- (6) The developer will be responsible for the consequential impacts of any works under paragraph (1) including part 1 land compensation claims.

Requirement 10:

Highway accesses

**10.—** (1) No new temporary or permanent means of access to a highway to be used by vehicular traffic, or any temporary or permanent alteration to an existing means of access to a highway used by vehicular traffic, may be formed for the Project A onshore works or Project A intertidal works until a highways access management plan for that access has been submitted to and approved in writing by the relevant planning authority, in consultation with the appropriate highway authority (satisfying all individual user needs, highway safety and design standards), and in relation to the Project A Blackpool Airport works, in consultation with BAOL to the extent specified in the outline highway access management plan.

- (2) Each highways access management plan must accord with the outline highways access management plan.
- (3) The highway accesses must be implemented as approved, under a signed Highways Act agreement.

Conclusion

- 8.13. Whilst significant progress has been made with regards to suitability of accesses and vehicle routes, at the time of the writing this closing LHA statement, it is unfortunate that one matter regarding the OCTMP is outstanding and some wording within the draft DCO is not agreed and positively concluded. The LHA kindly requests the support of the Examining Authority on the areas of disagreement raised by the LHA in the comments above.

## **9. Overall Conclusion**

- 9.1. As set out in the LCC's Relevant Representation (RR-1262) submitted to the Examining Authority in January 2025, the County Council recognises the national benefit of the Morgan and Morecambe Offshore Windfarm Transmission Assets Generation Assets project in terms of energy security, meeting renewable energy targets, and creating sustainable economic growth in Lancashire.
- 9.2. However, as also stated in its Relevant Representation (RR-1262), LCC considers that it is important that this is achieved without significant damage to the local built and natural environment, local communities and the tourist economy. The local impacts of the project and their cumulative impacts should be considered and adequately addressed by the applicant.
- 9.3. LCC had significant concerns at the start of the Examination and as set out in its Local Impact Report (REP1-085), and as set out in its subsequent submissions at Deadlines 2 to 6.
- 9.4. As summarised in this Submission LCC remains concerned that there are a number of local environmental impacts most particularly in relation to ecology, landscape and visual impact, Green Belt, Public Rights of Way and Highways that have not been adequately resolved by the applicants.

**Appendix A LCC Comments on the Green Belt and Area of Separation and Landscape and Visual Resources sections of the Morgan And Morecambe Offshore Wind Farms: Transmission Assets Lancashire County Council SOCG, Document Ref. S\_D1\_6.1/F04 (REP6-125).**

# MORGAN AND MORECAMBE OFFSHORE WIND FARMS: TRANSMISSION ASSETS

Lancashire County Council SoCG



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**Prepared by:**

**Morgan Offshore Wind Limited,  
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**Prepared for:**

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

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Signatories	
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Position	
For	Lancashire County Council
Signed	
Name	
Date	
Position	
For	Morgan OWL
Signed	
Name	
Date	
Position	
For	Morecambe OWL

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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

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# 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;

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- 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 joined 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 joined 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

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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
<b>Evidence Plan Process, Historic Environment EWG</b>			
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.
<b>Evidence Plan Process, Traffic and Transport EWG</b>			
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>
<b>Evidence Plan Process, Hydrology and Flood Risk EWG</b>			
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	LCC identified the need for the following information: <ul style="list-style-type: none"> <li>• Lifetime maintenance and management of the project</li> <li>• Disruption prevention measures</li> <li>• Surface water flood risk</li> <li>• Impacts on ordinary water courses</li> <li>• Demonstration of legislative compliance</li> <li>• Demonstration of ecological impact avoidance</li> <li>• Impact on designated sites</li> </ul> Other concerns include the scope of ecological assessments, potential working hours and biodiversity net gain.
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.
<b>Evidence Plan Process, Onshore Ecology (including Onshore and Intertidal Ornithology) EWG</b>			
23 March 2023	EWG01	Non-statutory engagement	<ul style="list-style-type: none"> <li>• The proposed scope of the onshore ecology (and onshore and intertidal ornithology) surveys in terms of species, survey coverage and methodologies.</li> <li>• The species for which surveys are not proposed</li> </ul>
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"> <li>• Further discussion on the approach to BNG including the commitment to submit a Biodiversity Benefit Statement</li> </ul>

Date	Form of consultation	Statutory or non-statutory engagement	Summary of consultation
			<ul style="list-style-type: none"> <li>The exclusion of areas from the BNG baseline (e.g. proposed mitigation areas at landfall)</li> </ul>
26 January 2024	EWG04	Non-statutory engagement	<ul style="list-style-type: none"> <li>Coverage of ecology surveys was presented during the meeting with further detail provided in a technical note</li> <li>Use of trenchless techniques at crossing locations to avoid or reduce direct and indirect effects on onshore ecology and nature conservation.</li> <li>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.</li> </ul>
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 date gaps exist.
<b>Evidence Plan Process, Land Use and Recreation</b>			
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> <ul style="list-style-type: none"> <li>The identification of PRoW located within the Onshore Order Limits;</li> <li>and • The outline management measures proposed for each PRoW identified, including requirements for managed crossing and temporary diversion.</li> </ul> <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
<b>Evidence Plan Process, Landscape and Visual Impacts EWG</b>			
22 February 2024	EWG01	Non-statutory engagement	<ul style="list-style-type: none"> <li>To scope out seascape effects from the assessment in response to a reduction in the offshore element of the Transmission Assets</li> <li>To agree the representative viewpoint locations for the onshore substations and River Ribble crossing head houses</li> <li>To present grey rendered photomontages of the main buildings and infrastructure at the onshore substations for all viewpoint locations.</li> </ul>
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 <sup>th</sup> 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 <sup>th</sup> 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"> <li>Delivery hours</li> </ul>

Date	Form of consultation	Statutory or non-statutory engagement	Summary of consultation
			<ul style="list-style-type: none"> <li>Highway condition (inc. peat roads)</li> <li>Route geometry</li> <li>Outline access designs</li> <li>Abnormal loads (highway structures)</li> </ul>
7 <sup>th</sup> 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.
<a href="#">3<sup>rd</sup> June</a>	<a href="#">Meeting with Lancashire County Council as Local Highway Authority</a>	<a href="#">Non Statutory</a>	<a href="#">Update on key workstream</a>
<a href="#">23<sup>rd</sup> June and 30<sup>th</sup> June</a>	<a href="#">Meeting with Lancashire County Council as Local Highway Authority</a>	<a href="#">Non Statutory</a>	<a href="#">Meeting to discuss the updated to the oCTMP and SoCG</a>
<a href="#">18<sup>th</sup> September</a> <a href="#">25<sup>th</sup> September.</a> <a href="#">29<sup>th</sup> September.</a> <a href="#">6<sup>th</sup> October</a> <a href="#">10<sup>th</sup> October</a> <a href="#">13<sup>th</sup> October (am)</a> <a href="#">13<sup>th</sup> October (pm)</a>	<a href="#">Meeting with Lancashire County Council as Local Highway Authority</a>	<a href="#">Non Statutory</a>	<a href="#">Workshops with LCC to discuss matters of detail in regard to the design of access, offsite last leg mitigation and CTMP drafting.</a>

## 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

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Position and colour coding	Definition of position
Not agreed	The matter is not considered to be agreed between the parties.



## 1.4.2 Green Belt and Area of Separation

Table 1.5: Agreement Log between the parties on Green Belt and Area of Separation

Reference Number	Discussion point	Applicants' position	Lancashire County Council position	Status
<b>Green Belt</b>				
<b>Site Selection</b>				
LCC.GB.1	Site Selection	<p>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.</p> <p><u>The Applicants stand by their approach to the site selection process and the search radius for the location of the substations, which was systematic and justifiable, as set out below.</u></p> <p><u>As set out in the Applicants' Response to ExQ 1.2.3 (REP3-056), the Applicants consider that Green Belt policy has been given appropriate weight and due consideration throughout the site selection and refinement process.</u></p> <p><u>Following the identification of the Point of Interconnection (POI) at Penwortham during Stage 1, Stage 2(c) focused on identifying suitable onshore substation search areas. The approach and outcomes of this process are described in Section 4.9 of Chapter 4: Site Selection and Consideration of Alternatives (AS-026) and Section 4.5.3 of Annex 4.3: Selection and Refinement of Onshore Infrastructure (AS-028).</u></p>	LCC recognise that a site selection exercise been undertaken but maintain disagreement as to the methodology and consider that Green Belt should have been factored in as a constraint at an earlier stage of the process.	Not agreed
			In relation to <u>cable routing</u> , LCC acknowledge that Green Belt could not be avoided in its entirety in connecting the landfall location to Penwortham Substation.	Agreed
			In relation to the substation locations, LCC consider that Green Belt should have been identified as a constraint at an earlier stage of the site selection process and assessment process, which was communicated earlier, and different radii explored beyond the random 8km.	Not agreed
			Also, that the Applicants should have tried to identify independent (rather than co-located) sites for the substations which were outside the Green Belt.	

Reference Number	Discussion point	Applicants' position	Lancashire County Council position	Status
		<p><u>The initial area of search was defined by a 5km radius around the POI at Penwortham. This parameter was informed by previous project experience and the technical and commercial feasibility of the cable routeing requirements, as detailed in paragraph 4.9.1.1 of AS-026 and paragraph 4.5.3.2 of AS-028.</u></p> <p><u>The selection of this radius was intended to minimise the length of the 400 kV grid connection cables linking the new substations to the existing Penwortham substation, thereby reducing the need for cable cooling, limiting reactive power issues, mitigating transmission losses, and supporting economic efficiency.</u></p> <p><u>Environmental constraint mapping undertaken within the initial 5km buffer identified a limited number of potential locations that met the design parameters for the substations, primarily due to the presence of flood zones, priority habitats, and high-pressure gas mains. As a result, the area of search was extended to 8km to identify feasible options.</u></p> <p><u>As illustrated in Figure 4 of the Green Belt Technical Note (REP4-092), this mapping indicates that further increasing the search radius would have been unlikely to identify any less constrained sites outside the Green Belt. A larger search radius would also have introduced greater technical challenges, including increased reactive power issues, higher transmission losses, and reduced overall efficiency.</u></p>		
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	As noted above, LCC consider the site selection process for identifying suitable sites for the substations is flawed because Green Belt should have been identified as a constraint at an earlier	Not agreed

Reference Number	Discussion point	Applicants' position	Lancashire County Council position	Status
		<p>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.</p> <p>Due to environmental constraints identified in the first stage, this radius was increased to 8km due to a lack of suitable sites. <a href="#">As illustrated in Figure 4 of the Green Belt Technical Note (REP4-092), this mapping indicates that further increasing the search radius would have been unlikely to identify any less constrained sites outside the Green Belt. A larger search radius would also have introduced greater technical challenges, including increased reactive power issues, higher transmission losses, and reduced overall efficiency.</a></p> <p><a href="#">The Applicants stand by their approach to the site selection process and the search radius for the location of the substations, which was systematic and justifiable.</a></p>	<p>stage of the process and that different radii &gt;8km should have explored sites outside Green Belt areas.</p> <p>LCC consider that proper consideration of separate, independent sites for the substations (geographically separate, not co-located sites) in areas outside the Green Belt has not been given in site selection.</p>	
LCC.GB.3	Site Selection	<p>The Applicants have provided reasoned justification to explain why the substations cannot be co-located on a single site.</p> <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>	<p>A single site for the substations is not desirable, as it compounds even further landscape and visual effects. Substations as close to one another as proposed also compound and create greater landscape and visual effects and greater effects on the Green Belt.</p>	Agreed
<b>Policy</b>				

Reference Number	Discussion point	Applicants' position	Lancashire County Council position	Status
LCC.GB.4	Policy and Planning	<p>The Applicants have appropriately identified and considered all plans and policies relevant to the Green Belt within LCC's remit in the Application, as documented in <a href="#">Section 1.2.5 Relevant Development Plans, including:</a></p> <ul style="list-style-type: none"> <li>• <a href="#">Blackpool Local Plan, Part 1: Core Strategy (2012 – 2027) (Adopted January 2016);</a></li> <li>• <a href="#">Fylde Local Plan to 2032 (incorporating Partial Review) (Adopted December 2021); and</a></li> <li>• <a href="#">South Ribble Local Plan (adopted July 2015).</a></li> </ul>		Agreed
LCC.GB.5	Policy and Planning	<p>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.</p>	<p>The Application would also be weighted against Green Belt policies in the individual areas of Blackpool, Fylde and South Ribble.</p>	Agreed
LCC.GB.6	Policy and Planning	<p>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 <del>may</del> would include relevant policies, guidance and strategy documents within the NPPF and local development <del>plans</del> <del>plans</del> (listed above in <a href="#">LCC.GB.4</a>).</p>	As above/ agreed	Agreed
LCC.GB.7	Policy and Planning	<p>The fundamental aim of Green Belt, namely 'to prevent urban sprawl by keeping land permanently open' and the essential characteristics of 'openness and permanence' as set out in paragraph 142 of NPPF 2025 are clear and agreed</p>	<p>This fundamental aim is to be read in conjunction with the 5 purposes of Green Belt.</p>	Agreed

Reference Number	Discussion point	Applicants' position	Lancashire County Council position	Status
LCC.GB.8	Policy and Planning	<p><a href="#">The Applicants reaffirm, as set out in its repeated submissions on this topic during the Exminalation, that Green Belt is a land use and spatial policy designation.</a></p> <p>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 <a href="#">described in</a> <del>per</del> guidance set out in GLVIA3.</p>	<p>Green Belt can be of local and high value, despite its lack of 'higher status' (such as AONB). This lack of designation <i>per se</i> is not a justification to underplaying the purpose of the Green Belt.</p> <p>In particular it fulfills 3 of the 5 purposes which are afforded to Green Belt.</p>	Agreed
LCC.GB.9	Policy and Planning	<p>The 'openness' of Green Belt is capable of having both spatial and visual elements.</p> <p><a href="#">The Applicants note that Green Belt policy often extends over land that includes buildings, which may involve permitted development or development considered appropriate, such as agricultural buildings. However, Green Belt often extends over expansive areas of built form or infrastructure. In the case of the land between Kirkham and Freckleton, the policy extends over dwellings to the south, entirely encompassing HM Prison Kirkham, and the settlement of the south of it, by way of example.</a></p>	<p>The Green Belt area where both Substations are proposed is open and has both spatial and visual elements.</p> <p>Built form should generally relate to permitted and acceptable forms of built development. E.g. Agricultural uses etc.</p> <p>It is clear within Green Belt guidance notes that it depends on the context of the built development, whether the landscape, openness and views can flow through. It is noted that the scale of the built development proposed is completely out of scale and does not permit openness and views.</p>	Agreed
LCC.GB.10	Policy and Planning	<p>When considering 'spatial' openness, the relevant factors are the scale, form and density of built development.</p> <p>'Openness' does not imply a freedom from any built form.</p>	<p>Spatial openness would also include the volume of built development and its arrangement and layout, whether e.g. it permits openness to continue in the Green Belt. It could relate to the elements in the existing landscape which can add to or permit spatial openness.</p> <p>The open agricultural field areas, with generally low managed hedgerows permit openness with long and distant views and help to separate settlement areas.</p>	Agreed
LCC.GB.11	Policy and Planning	<p>When considering 'visual' openness, consideration is given to the role of topography,</p>	<p>Visual openness applies to the proposed substation sites, particularly the Morgan site, here</p>	Agreed

Reference Number	Discussion point	Applicants' position	Lancashire County Council position	Status
		<p>vegetation, buildings, linear features in maintaining or screening open views of the wider Green Belt.</p> <p><a href="#">The assessment of the effect on visual openness resulting from the substations is provided in the Green Belt Technical Note (REP4-092), and includes analysis of the existing performance of the Green Belt based on standard assessment criteria.</a></p> <p><a href="#">It is noted that spatial and visual openness work in synergy and should not be considered in isolation in decision making.</a></p>	<p>the slightly raised topograohy permits open views across agricultural and rural areas, to nearby settlements and hills beyond. The rural [pattern is strong. The proposed substations prevent this visual openness, by their spatial dominance. Views cannot flow over or around and their permanence prevents this for a long period. It is likely that this could not be reestablished on decommission as it would then be categorised as Grey Belt. Visual openness contributes to the space between settlements, helping maintain a sense of place.</p> <p>It is noted that the criteria used to score Green Belt in this Application is not an accepted methodology, but a methodology applied by the Applicant.</p>	
LCC.GB.12	Policy and Planning	<p>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.</p>	<p>Timmins v. Gedling Borough Council [2014] EWHC 654 (Admin) "<i>[any] construction harms openness quite irrespective of its impact in terms of its obtrusiveness or its aesthetic attractions or qualities</i>"</p> <p>The concept of openness is not one which is narrowly limited to volumetric approach but is 'open-textured' and relates to a number of factors, which are capable of being relevant as well as visual.</p>	Agreed
LCC.GB.13	Policy and Planning	<p>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 by extension, reduce/ mitigate harm by inappropriateness and any other harm (in relation to landscape and visual effects), on the Green Belt through design.</p>	<p>Landform plays a minor role in visual enclosure, both on flat coastal plains and especially for the Substation sites, where there is additional emphasis due to its more prominent and higher ridgeline location. Here planting mitigation would screen the Substations in part, however it would restrict and change current openness and long and distant views, therefore the harm from the proposed development and to the openness spatially or visually would remain.</p>	Not Agreed

Commented [LE1]: Comment moved from LCC to Applicant

Commented [Nat2R1]: Noted and accepted.

Reference Number	Discussion point	Applicants' position	Lancashire County Council position	Status
			Planting and Landform manipulation mitigate <u>impacts</u> of development in part, but these also change and irretrievably destroy this area of the Green Belt , its intrinsic qualities of openness and weaken its ability to fulfil its purposes within the wider area.	
<b>Function and Purposes of the Green Belt</b>				
LCC.GB.14	Policy and Planning	The five purposes of the Green Belt are as defined in paragraph 143 of the NPPF 2025.	<b>The Council agree.</b>	Agreed
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> .	<b>The Council agree</b> that purposes a) and c) were identified by the Applicant as being the purposes of relevance, <u>but question whether purpose b) is also of relevance (without knit picking about size of development)</u>	Not Agreed
LCC.GB.16	Policy and Planning	Purpose c) <i>'to safeguard the countryside from encroachment'</i> is the principal issue to be addressed.	<b>The Council disagree</b> that its the 'principal' issue, rather it is one of the main issues alongside Purpose a) and b).	Not <del>agreed</del>
LCC.GB.17	Policy and Planning	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'.  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> .  <u>The Applicants note that it is not within their remit to determine what constitutes a 'town' or 'village'. Their assessment has been undertaken based on the evidence available at the time and reflects</u>	LCC acknowledge that Kirkham is a town but suggest due to their growing sizes Newton with Scales and Freckleton are in between villages and towns, therefore queries whether it is knit picking to query this element.  Freckleton would be a town. It is a local service centre in the Fylde Local Plan Settlement Hierarchy and therefore higher than the tier 1 or tier 2 rural settlements.  LCC note that the area of Green Belt between Kirkham and Freckleton, works alongside the Area of Separation directly east of the Substation Development sites to prevent the spread of Kirkham towards Newton with Scales.	Not Agreed

Reference Number	Discussion point	Applicants' position	Lancashire County Council position	Status
		<p><u>their professional judgement in evaluating the degree of harm in relation to that evidence.</u></p> <p><u>The Applicants refers to LCC.GB.42 to 44 with regard to matters on the Area of Separation.</u></p>		
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>	The Council agree.	Agreed
LCC.GB.19	Function and Purpose	<p>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.</p>	<p>Blackpool Airport for the main part maintains openness so would note it has more than just one purpose and this should be acknowledged. Equally other Green Belt land uses in this area generally maintain openness. The latter is especially important within the landfall area.</p>	Agreed
LCC.GB.20	Function and Purpose	<p>The area of Green Belt between Kirkham and Freckleton is adjoined by <u>A</u>reas of Separation and Countryside designations which complete the policy coverage of land between the surrounding settlements.</p> <p><u>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 between Kirkham and Freckleton is to protect the area of land which stretches north-south between Kirkham and Freckleton these two settlements and their settlement boundaries. The</u></p>	<p>Directly east of the Green Belt and Substation Site is the Area of Separation. This designation by FBC designed to work alongside the <u>relatively small area of Green Belt designation</u>, which then <u>together strengthen and protect the openness not just north and south, but also east and west.</u></p>	Agreed

Reference Number	Discussion point	Applicants' position	Lancashire County Council position	Status
		<a href="#"><u>Green Belt does not extend to settlement boundaries in an east-west direction.</u></a>		
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 development, maintain the openness and character of the area and to restrict urban sprawl.</p>	Post consent would need to check maintains these objectives and ensure mitigation if required.	Agreed
<b>Harm to Green Belt</b>				
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.	<p>Green Belt could have been designated by FBC with a view to two designations working alongside, i.e. the Area of Separation. The Green Belt area in this location is relatively small. There is benefit in the two areas working together.</p> <p>Harm within the Green Belt particularly regarding openness would therefore impact on the Area of Separation. See also LCC.GB.30-35</p> <p>The Applicant recognises the proposed Harm to the Green Belt by attempts to mitigate and create planting 'buffers' to reduce the 'zone of influence' of the proposed development. This further reduces openness.</p>	Agreed
<b>Inappropriate Development</b>				
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	Paragraph 153 also states 'Any harm to the Green Belt, which explicitly includes harm to openness, must be given 'substantial weight' by decision makers.	Agreed

Reference Number	Discussion point	Applicants' position	Lancashire County Council position	Status
		from the proposal, is clearly outweighed by other considerations (paragraph 153 of NPPF 2025).		
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.	Perhaps use of would not will...and the use of the conditional tense as the specific application would not be guaranteed and be determined on relevance.	Agreed
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.	Also needs to state/ include where does not cause substantial harm to the openness of the Green Belt. Para 154 is not appropriate in considering the substations as they are buildings and therefore not covered by the exemptions in para 154.	Agreed
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.	It is recommended that 'engineering operations' should have a timescale attached and should not be considered to change character of the 'Green Belt' for unquantified periods of time, unnecessarily. Considered timescales-no removal of Green Belt elements until specifically required and restoration (of openness and character) asap on completion of engineering works. i.e. Duration, Remediability & Degree of Activity Para 154 is not appropriate in considering the substations as they are buildings and therefore not covered by the exemptions in para 154.	Agreed
LCC.GB.27	Assessment	Temporary construction compounds are also considered to be ' <i>engineering operations</i> ' for the purposes of NPPF paragraph 154. <del>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 however, not considered to benefit from the exception under paragraph 154</del>	Time aspect as noted in LCC.GB.26 also applies.	Agreed

Reference Number	Discussion point	Applicants' position	Lancashire County Council position	Status
		<u>in this instance (and are therefore "inappropriate development"</u> 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.		
		<u>The substations are considered to be inappropriate development, which is by definition harmful to the Green Belt and should not be approved except in Very Special Circumstances.</u>	Any harm to the Green Belt, which explicitly includes harm to openness, must be given 'substantial weight' by decision makers	
<b>Assessment Methodology</b>				
LCC.GB.28	Assessment	The <del>parties agree that the</del> 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.	There is not a standard methodology for assessment of the Green Belt and the Applicant has initiated the methodology. See also LCC.GB.29.	Agreed
			LCC do not agree with the outcomes of the Applicants' assessment, namely; LCC do Not Agree with the Applicants assessment of the impact HMP Kirkham has on the existing openness of the Green Belt in the northern part of the designation between Kirkham and Freckleton. LCC consider that the openness of the Green Belt where Substations are proposed has been underplayed and that a greater acknowledgement of the Green Belt qualities should be recognised for coastal areas in and around Landfall.	Not agreed
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	LCC note that the methodology set out in Appendix C (Table 9) is initiated by the Applicant and as such does not follow any recognised or accepted Guidance rules. It is recommended that 'total or major' should read as 'Significant' when relating to the 'major' category.	Not Agreed

Reference Number	Discussion point	Applicants' position	Lancashire County Council position	Status
		Appendix C of the Green Belt Technical Note (F02) submitted at D4 (REP4-092) is suitable.	LCC do not necessarily agree with the outcomes of the Applicants' assessment. Concerns relate specifically to the spatial and visual harm to the Green Belt to be caused by the proposed substations and their ancillary features, but also duration regarding the permanence of the structures and the infeasibility of the site ever being able to return to its current state (site areas would qualify as Grey Belt in any future baseline). There is no knowing whether further applications would be made to extend the existing proposed size, within the 35 year period, potentially further affecting Green Belt). With regards to the wider transmission cables areas it is the unknown duration, phasing, restoration and timing of the construction programme.	
<b>Scale of Harm</b>				
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 these elements, is mitigated by the transitory and fully reversible nature of the impacts.	No permanent harm should be caused to the openness and purposes of the Green Belt once the compound areas are reinstated. There is however concern over <u>the Duration of harm</u> also when combined with Degree of Activity ( <u>or inactivity</u> - features remaining whilst no construction) and that visual aspects of harm, despite being temporary should be minimised. It is of particular concern on the beach/ landfall area.	Not Agreed
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. <u>The Applicants note that any suggestion that the presence of the substation would result in the</u>	No permanent harm should be caused to the openness and purposes of the Green Belt, however points noted in LCC.GB.30 apply and would need to ensure that these areas are not classed as 'Grey Belt' going forward? Experience has indicated that once hard standings are in location (for compounds) they very often do not get removed or reinstated- in the case of the	Not Agreed

Reference Number	Discussion point	Applicants' position	Lancashire County Council position	Status
		<u>existing area of Green Belt being regarded as "Grey Belt" are unfounded. Moreover, any future development within the area would continue to require planning consent from the local planning authority, and this controlling mechanism would therefore remain in place for any potential development proposals in the future.</u>	compound areas full reinstatement should be guaranteed.  It is Not Agreed that Substation sites would be reinstated as Green Belt. By the very action of the scale and nature of the built development proposed these sites would constitute Grey Belt sites for the future baseline.	
LCC.GB.32	Assessment	Substations partly comprise 'engineering operations', 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.	It should be noted that the 'engineering operations' elements of the substations are associated with the Substations (ingress/egress). They limit potential mitigation of the Substations and therefore help create Residual Impacts-as the areas cannot receive tree planting).  Scale, volume of development, specific location and co location of two substations in proximity creates an inability to mitigate resulting in Residual Effects both spatially and visually.	Agreed
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.  The harm to the Green Belt by reason of inappropriateness and identified 'other harms', <u>principally</u> relates <u>amongst other matters</u> to the scale of proposed built form and the buildings within the substations <u>in their landscape and settlement context</u> leading to a reduction <del>lack of</del> in openness and encroachment into the countryside.	The harm to the Green Belt <u>relates to several factors</u> ; these include the <u>number and scale</u> of industrial style buildings and associated forms, hardstandings, industrial style fencing which significantly impact on the spatial and visual aspects of the Green Belt, but also their specific location in the Green Belt-on a ridge-line which affects <u>greater visual and spatial prominence</u> to the proposed development.  It would include their <u>Duration</u> in terms of permanence and Remediability, as it is unlikely that the Green Belt would ever be restored to its original condition (it would qualify as Grey Belt in any future baseline). This is compounded by	Not Agreed

Reference Number	Discussion point	Applicants' position	Lancashire County Council position	Status
		<a href="#">In accordance with the Green Belt methodology to assess Green Belt harm, the duration and nature of the changes inform the assessment of harm.</a>	<p>doubling the impacts by the location of two substations in such close proximity.</p> <p>The characterising features of openness- the views of rural agricultural areas, tranquillity etc. of this openness and the long distant views and horizons- this quality and freedom to breathe and from urban containment would be destroyed within this relatively small Green Belt area.</p>	
LCC.GB.34	Assessment	<p>'Other harms' are considered to comprise the following: landscape <a href="#">character</a> and visual <a href="#">amenity</a> impacts, <a href="#">as recirded in the LVIA</a>, and impacts to amenity <a href="#">relating to the visual amenity experiecne from PRoW</a>, biodiversity and highways, <a href="#">as recorded in the ES</a>.</p> <p>Harms relating to landscape and visual impacts are considered to</p>	<p>'Other harms' include visual impacts from adjacent residents/ users, but fundamentally to the Landscape Character of the Green Belt. Open rural agricultural field areas, defined by low hedgerows which permit the open and long views.</p> <p>It is a relatively small Green Belt area, the scale of proposed development significantly effects the scale of the Green Belt area and therefore its ability to maintain its purpose.</p> <p>Other harm is created by Residual effects, the scope for further mitigation exists and therefore the Applicant has not 'minimised' the Residual impacts of the development in accordance with NPS EN1.</p> <p>Specifically in relation to Amenity this includes the use of the Bridleway and ProW close to the Substations. Consideration to further consider minimising Residual impacts are required.</p> <p>Permanent access tracks at 15m width are considered excessivley wide and would create further impact on Landscape Character and negative Visual Effects.</p>	Not Agreed
LCC.GB.35	Assessment	The harm caused by the substations <a href="#">is-can be</a> reduced and mitigated through good design, proposed planting and embedded mitigation.	Residual Effects of the Substation design need to address all aspects of the Proposed Development. To date the Applicant has committed to very little to guarantee that effects would be 'minimised' as far	Not Agreed

Reference Number	Discussion point	Applicants' position	Lancashire County Council position	Status
		<u>Regarding matters of 'good design', the Applicants refer to the outline Design Principles (J3/F03), which documents the delivery of good design for the Transmission Assets project including a record of design process and design delivery. It covers the construction and operational phase delivery of the two onshore substations; the design of the habitat mitigation proposals; and the cable route reinstatement. The document also sets out the Applicants' approach to the post consent design development of the design elements associated with the two onshore substations. Notably, the Project Level Design Principles and Design Codes will guide subsequent post-consent detailed design, in accordance with the relevant DCO Requirement(s). They are intended to address local character and context considerations and provide supporting guidance to secure good design outcomes.</u>	<p>as possible. The Applicants have demonstrated wording which gives little confidence that issues would be addressed. For example Good Design seems to relate to the Substation operation only. Further commitments to minimising Visual and Landscape effects (as far as possible) should be detailed, inclusive of offsite planting and potentially positioning attenuation features off site.</p> <p>Harm to Landscape Character ultimately could not be reduced or mitigated by the proposed development.</p> <p>The Design Codes currently do not address concerns sufficiently. It is noted that the fundamental Landscape Proposals have not been agreed and have not been updated in over a 7 month period. Detailed design is therefore not yet considered applicable. This is not 'Good Design'. This does not help in assuring confidence that concerns would be addressed post consent.</p>	
<a href="#">LCC.GB.36</a>	Assessment	<u>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).</u>	<u>LCC are reviewing the Green Belt Technical Note submitted at Deadline 4 (REP4-002).</u>	Ongoing point of discussion
<b>Critical National Priority Infrastructure</b>				
<a href="#">LCC.GB.37</a> <a href="#">36</a>	Policy and Planning	The Transmission Assets can be considered to comprise Critical National Priority Infrastructure as defined in NPS EN-1.	The Council agree.	Agreed
<a href="#">LCC.GB.38</a> <a href="#">37</a>	Policy and Planning	The Applicants have applied the mitigation hierarchy in relation to the rigorous site selection process.	LCC comment that this mitigation hierarchy should have applied a constraint of Green Belt in helping to determine the location of Substations outside Green Belt and that the radii used to determine site	Not Agreed

Reference Number	Discussion point	Applicants' position	Lancashire County Council position	Status
		<a href="#">The Applicants refer to their position, in relation to the site selection process, set out in LCC.GB.1 and LCC.GB.2 above.</a>	location should have extended beyond 8km. Good Design therefore has not been demonstrated.	
		<a href="#">In relation to cable routing, it is accepted that Green Belt cannot be avoided in its entirety.</a>	The Council agree.	Agreed
		<a href="#">In relation to the substations, a site selection exercise has been undertaken which demonstrates that these could not reasonably be sited outside the Green Belt.</a>	See Response above in part 1 of LCC.GB.38	Not Agreed
LCC.GB.39 <a href="#">38</a>	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.	Might mitigation be applied wider than just the hierarchy? i.e. Residual impacts? Minimising effects? Note also 'Any harm to the Green Belt, which explicitly includes harm to openness, must be given <b>'substantial weight'</b> by decision makers.	Not Agreed
<b>Very Special Circumstances</b>				
LCC.GB.40 <a href="#">39</a>	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.  <a href="#">The Applicants refer to their position, in relation to the site selection process, set out in LCC.GB.1 and LCC.GB.2 above.</a>	Very special circumstances can apply to the generation of renewable energy  The Council consider that the site selection process did not consider Green Belt a constraint and that as such the strategy to locate the potential Substation sites is flawed.  Proposing the substation development in Green Belt requires that VSC would need to be higher in terms of requirements to mitigate impacts and effects, that <b>all efforts to mitigate and minimise</b> Residual effects should be taken.	Agreed  Not Agreed

Reference Number	Discussion point	Applicants' position	Lancashire County Council position	Status
LCC.GB.44 <a href="#">40</a>	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.	See <i>LCC.GB.40</i> response  Significant weight of harm to the Green Belt should not be outweighed without due consideration to minimise impacts of the Proposed Development by the Applicant. This has not yet been achieved.  The Substantial weight which should be afforded to Green Belt has also not yet been achieved.	Not Agreed
<b>Area of Separation</b>				
<b>Policy</b>				
LCC.GB.42 <a href="#">41</a>	Policy and planning	Local Area of Separation policy is distinct from national Green Belt policy.	It is noted that in this instance the Green Belt Policy reads alongside The Local Area of Separation Policy. Although distinct they should be read in conjunction with relevance to this Application.	Agreed
LCC.GB.43 <a href="#">42</a>	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.  <a href="#">The Applicants reaffirm their conclusions on this matter, as set out in its submissions during the Examination.</a>	See in relation to <i>LCC.GB.22</i> . Does the Area of Separation Policy state either way if there is or is not a buffer or setting? Can you apply <u>harm</u> to an Area of Separation as in Green Belt? It could certainly be influenced strongly by adjacent development and its effectiveness reduced if it were designed to work alongside in this instance Green Belt.  This is a fairly small Green Belt Area. It is strengthened by its immediate proximity to The Area of Separation, as the two are read together in views and in a landscape context. The Proposed Substations would significantly affect the Green Belt, Landscape Character, and visual aspects when the two designations are read together. The Urban boundary would effectively move to the eastern extent of the Substations, rather than along the boundary of Freckleton Road and Kirkham Road.	Not Agreed

Reference Number	Discussion point	Applicants' position	Lancashire County Council position	Status
LCC.GB.44 <a href="#">43</a>	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.	There are Moderately adverse views and views from businesses (relying on the rural context) within the Area of Separation.	Agreed

### 1.4.3 Landscape and Visual Resources

Table 1.6: Agreement Log between the parties on Landscape and Visual Resources

Reference Number	Discussion point	Applicants' position	Lancashire County Council position	Status
<b>EIA</b>				
LCC.LVR.1	Consultation	<p>The Applicants have consulted with the Council on comments raised regarding potential impacts on landscape and visual resources, during 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><u>To the extent that there was follow up on SoCG matters, the Applicants have sought to address these matters and reflect them in the SoCG to</u></p>	<p>The Applicants have had preliminary discussions and engaged with the Council on the comments they have raised 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> <p><u>Unfortunately, LCC Landscape do not consider that the Applicants have engaged constructively or have acknowledged previous comments and representations and would disagree that options have been explored or that the Applicants have approached 'the process constructively, prepared to exchange perspectives and explore options'</u></p> <p><u>Only at one face to face meeting (the recent Expert Witness meeting) on Landscape SoCG were points raised by LCC Landscape acknowledged, but these have neither been documented or actioned upon.</u></p> <p>LCC disagree with the Applicants statements. Changes to the documents have been one sided and defensive. Most meetings have been a presentation of facts in a Teams Meeting consisting many people, without any chance beforehand to study the presentation and engage constructively.</p>	<b>Not Agreed</b>

Reference Number	Discussion point	Applicants' position	Lancashire County Council position	Status
		<a href="#">ensure the matters of difference are before the ExA.</a>	This is the reason therefore that there has been <b>consistent</b> repetition of the same issues of concern.	
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 Applicants refer to their position at LCC.LVR.1, 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.</p> <p><a href="#">The Applicants have listened to concerns raised by LCC Landscape but have retained their position in relation to the adequacy of the LVIA. The Applicants acknowledge differences of opinion are inevitable and not unusual but did not, and do not consider that changes to the LVIA assessment which is before the ExA are required or justified.</a></p>	<p>The Applicants have had 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> <p><a href="#">LCC Landscape have found themselves to be constantly on the back foot with regards to presentation of information. Meetings are not constructive when they are a one-sided presentation of a document with an expectation to comment immediately.</a></p> <p><a href="#">LCC Landscape do not agree that the Applicants have engaged constructively.</a></p> <p>The Applicants have not 'listened' to concerns. They have read comments <b>consistently</b>, but not acknowledged or discussed openly.</p> <p>The concerns go beyond what is presented as part of a process in LVIA. They concern the relevance of good design, which it is considered has not yet been achieved.</p> <p>Work stages which all Landscape Architects will work to as part of the JCLI (Joint Council for Landscape Industries) and signing off of these procedures related to those stages. The Landscape Proposals are not yet agreed and</p>	Not Agreed

Reference Number	Discussion point	Applicants' position	Lancashire County Council position	Status
			are found to be substandard in what they have presented over the course of the last 6 months+	
LCC.LVR.3	Policy and planning	<p>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).</p> <p>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.</p>	<p>LCC 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.</p> <p>It is considered that aspects of the LCA's e.g. relating to ponds have not been addressed and that NPS's residual matters are not 'minimised' or 'reduced or mitigated' sufficiently.</p>	Not agreed
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</p>	<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><b><u>It is not unusual within an Assessment process to include further or reassessment of Viewpoints on request, and usually this is</u></b></p>	Not agreed

Reference Number	Discussion point	Applicants' position	Lancashire County Council position	Status
		<p>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"> <li>• The representative viewpoints for the onshore substations, as presented in the PEIR, acknowledging that final view orientations may be subject to micro-siting;</li> <li>• The representative and candidate viewpoint locations for the River Ribble crossing; and</li> <li>• The presentation of grey-rendered photomontages illustrating the main buildings and associated infrastructure at the onshore substations for all agreed viewpoint locations.</li> </ul> <p>Accordingly, no further photography was requested or captured undertaken after February 2024.</p> <p><a href="#">The Applicants have noted LCC's commentary on the visualisations submitted in support of the LVIA. As recognised in best practice guidance, including that set out in GLVIA3 and the Landscape Institute's Technical Guidance Note 06/19 Visual Representation of Development Proposals, photographs play an important role in communicating information about the landscape and visual effects of a proposed development. However, it is acknowledged that visualisations</a></p>	<p><b>forthcoming without much issue.</b> The Applicant has however been reluctant. Equally some of the Viewpoints were noted as lacking and updates have proven difficult to achieve. The Applicant has on one instance stated Viewpoints were 'accurate' (in terms of levels), but on another occasion noted that levels were 'indicative', Therefore Viewpoints in some instances cannot be as portrayed.</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> <p>The Council considers some of the selected Viewpoint photography, located close to Substations, to be 'biased' towards the Applicants objectives and do not fairly represent the actual views. In the Council's opinion, this is the case for Viewpoints 2, 3 and 12.</p> <p>(e.g. If a Viewpoint is taken along a lane should it be the furthest point along the lane away from the substations, with foreground vegetation obscuring the view? The JCLI Guidance states photography should avoid these situations).</p> <p>With regards topographical survey see also LCC.LVR.5 below.</p> <p>In terms of information presented at this level (for Application) there has been genuine disappointment at the poor level of survey information presented, that this has generally been substandard and has taken significant efforts to achieve updates which have allowed sufficient assessment of the application. All this has taken time, which could have been spent on design elements. There is now much posturing</p>	

Reference Number	Discussion point	Applicants' position	Lancashire County Council position	Status
		<p><u>cannot replicate precisely how a development would appear when experienced in the field. It is neither possible nor practical to include photographs of every potential view or every part of the surrounding landscape. Accordingly, representative viewpoints are selected to represent a range of landscape character types / areas and visual receptors, and to convey their defining characteristics and key visual relationships.</u></p> <p><u>Furthermore, visual representations are intended as interpretative tools to assist all interested parties in understanding the nature of the proposed change and how it may influence specific views from agreed locations. In preparing the visual material submitted in support of the LVIA, the Applicants have adhered to the best practice methods prescribed by the Landscape Institute. The approach adopted is consistent with that applied on other Nationally Significant Infrastructure Projects, which have been accepted by relevant local planning authorities and the Secretary of State. The approach and outputs used for this Project therefore accords with established and accepted practice for the preparation and presentation of visual materials in support of NSIP applications.</u></p>	<p>about process, which in many of the arguments is irrelevant to the concerns which have been consistently been raised.</p> <p><b>This remains a position of disagreement.</b></p>	
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 <del>wish to reiterate</del> <u>firstly remind LCC</u> that the submissions forming part of the DCO application have been prepared by Chartered</p>	<p><b>The Council disagree</b> 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</p>	Not agreed, but not material

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		<p>practitioners with extensive experience in the delivery of comparable infrastructure projects <u>with no intention of misrepresentation</u>. 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><u>The Applicants acknowledged LCC's preference for cross-sections with an adjusted vertical exaggeration to aid legibility, which was also noted during ISH3 and documented as Hearing Action Point ISH2.17 (S_D5_6/F01). The Applicants provided updated documentation in response at Deadline 5, which was presented clearly and legibly with the information LCC and the ExA requested.</u></p> <p><u>The Applicants are disappointed to note LCC's accusation of a lack of integrity, competence and/or professionalism of the Applicants and their appointed landscape architects.</u></p>	<p>detail and legibility for the average non-professional to be able to interpret.</p> <p><u>The aspects which have proven difficult include topography and particularly cross sections and sections. The poor presentation of these documents has been illegible (even to the Examiner's comments-ISH2) and is designed to maximise the Applicants standpoint and has not been an honest representation.</u></p> <p>LCC state simply that some of the baseline information has been lacking and to note that the Landscape Consultants are not independent.</p> <p>What explanation is possible for lack of accurately stated ZTV information, lack of topographical information? Cross sections and Sections were only achieved with continued efforts on behalf of LCC and were only partially updated-original drawings had no scale, still don't demonstrate the built layout.</p> <p>It would be preferable not to argue what is considered the small trifles of detail and process, but to make real changes which would benefit the proposed appearance of very large structures in a rural and agricultural setting, which is designated Green Belt to separate areas of settlements.</p>	
LCC.LVR.6	Baseline methodology	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	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	Not agreed

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		<p>ensure that the worst-case scenarios are identified and assessed in the EIA.</p> <p>The Applicants 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 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>worst-case scenarios are identified and assessed in the EIA.</p> <p>The Applicants accept that, in some instances, their applications are 'indicative' and therefore cannot be considered a worst-case scenario.</p> <p>Equally, with relation to LCC.LVR.5 above, and as Advice Note 9 on The Rochdale Envelope 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:</u> <i>"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"</i></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	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>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</p>	Not agreed

Reference Number	Discussion point	Applicants' position	Lancashire County Council position	Status
			<p>landscape, resulting in an underrepresentation of potential impacts within the Transmission Assets study areas.</p> <p>In particular, these include:</p> <ul style="list-style-type: none"> <li>• Effects at Landfall especially during the construction period, which as understood 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;</li> <li>• 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.</li> </ul>	
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</i></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

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		<p><i>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>It is noted that the Proposed Substation sites would be termed as Grey Belt following decommissioning. As such the changes to landscape character would be irreversible.</p>	
LCC.LVR.9	Scope of the Assessment	<p>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.</p> <p><u>The Applicants have listened to concerns raised by LCC Landscape and do not consider that they have been inflexible but have retained their position in relation to the adequacy of the LVIA and its findings. The Applicants acknowledge differences of opinion are inevitable and not unusual, but did not, and do not, consider that changes to the LVIA assessment, which is before the ExA, are required or justified.</u></p>	<p>The Applicants have adhered to the scope of the ES that was developed, and generally agreed to, during <b>preliminary consultations</b> 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.</p> <p>The Council considers the Applicant has been inflexible in developing, progressing and addressing issues raised from initial assessment. It is disagreed that the Applicants have listened to concerns, or have ever stated as per their last paragraph in this category. <u>The process should not negate a readiness to mitigate effectively</u> as the project develops.</p>	Not Agreed
LCC.LVR.10	Scoping	<p>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.</p> <p>Detail is provided in Table 10.7 of Volume 3, Chapter 10: Landscape and Visual Resources (APP-123), which outlines the comments raised</p>	<p><u>The Council agree that the Applicants submitted a Scoping Report that described the general studies being undertaken to provide an assessment of any likely significant effects for all phases of the Transmission Assets.</u></p>	Agreed

Reference Number	Discussion point	Applicants' position	Lancashire County Council position	Status
		by the Council, the Applicants' responses, and how these were addressed within the Environmental Statement (ES) chapter		
LCC.LVR.11	Study area	<p>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.</p> <p>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 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>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.</p> <p>The Council considers that significant effects would also include Green Bank Farm and Freshfield Farm.</p>	Not agreed, but not material
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>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>	Not agreed, but not material

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		<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). The Applicants stand by this clarification.</p>	<p>The Council considers it is usual to provide two ZTV's of both scenarios (built and unbuilt), as 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>	
LCC.LVR.13	Project design envelope	<p>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>	<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. It does not sufficiently describe 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.	<p>The sensitivity criteria - covering value, susceptibility, integrity and capacity - for landscape and visual resources have been correctly identified and sufficiently described</p>	<p><b>The Council disagree</b> that the sensitivity criteria for landscape and visual resources have</p>	Not agreed, but not material

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		<p>within Volume 3, Chapter 10 Landscape and Visual Resources (APP-123).</p> <p><u>The Applicants acknowledge the differences of opinion between them and LCC on the sensitivity criteria, which has been raised as a general point throughout LCC's submissions.</u></p> <p><u>The Applicants did not, and do not, consider that changes to the LVIA assessment, which is before the ExA, are required or justified.</u></p>	<p>been correctly identified and sufficiently described in ES Chapter 10 (APP-123).</p> <p><u>Where the Council has raised differences, these should be acknowledged and stated.</u></p>	
LCC.LVR.15	Assessment methodology	<p>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 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.</p> <p><u>The Applicants are disappointed to note LCC's accusation of a lack of integrity, competence and/or professionalism of the Applicants and their appointed landscape architects.</u></p>	<p><b>The Council agree</b> 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.</p>	Agreed
			<p>The Council states however, that the Cumulative Effects, ZTV's and night-time areas of the LVIA are weak, that baseline 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.</p> <p>LCC note there is no accusation merely stating that some aspects of the submissions have been poor, which have not enabled assessment.</p>	Not agreed, but not material
LCC.LVR.16	Assessment methodology	<p>The magnitude of impact criteria for landscape and visual resources <u>havehas</u> been correctly</p>	<p>The Council disagree that the magnitude of impact criteria for landscape and visual</p>	Not agreed

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		<p>identified and sufficiently described within Volume 3, Chapter 10 Landscape and Visual Resources (APP-123).</p> <p><u>The Applicants acknowledge the differences of opinion between them and LCC on the magnitude of impact criteria, which has been raised as a general point throughout LCC's submissions, most markedly in LCC's Appendix A - LCC Landscape Comments (ISH Item 2) (REP4-136).</u></p>	<p>resources has been correctly identified and sufficiently described in ES Chapter 10 (APP-123).</p>	
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 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</p>	<p>The Council agree that the significance of effects upon landscape and visual resources has been in general 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> <p>It is acknowledged that the Applicant provides a reference to Moderate effects, but it is noted that some of the required mitigation (currently residual effects) specifically applies to those experiencing Moderate effects (<u>not all are detailed</u>) and that these could and should be relatively easily addressed in terms of mitigation. So again the process is one aspect,</p>	Not agreed, but not material

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		<p>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> <p><u>The Applicants have retained their position in relation to the adequacy of the LVIA and its findings. We acknowledge differences of opinion are inevitable and not unusual but did not, and do not consider, that changes to the LVIA assessment which is before the ExA are required or justified.</u></p> <p><u>In relation to the presentation of effects including those of Moderate rating, the Applicants refer the ExA to the tabulated assessment effects Table 10.29 of the LVIA (APP-123). which provide clear and easy access to the judgments made and the build-up of the criteria that objectively inform the significance of effect outcome.</u></p>	<p>but <u>action from the process in the form of mitigation is required</u> and not a constant repetition of the process for process' sake.</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.	<p>The Council disagree that the assumptions and limitations of ES Chapter 10 (APP-123) are fair and reasonable.</p> <p>The Council considers that the points and issued raised over the previous 6 months plus have not been addressed.</p>	Not agreed

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LCC.LVR.19	CEA scope	<p>The list of projects screened into the Cumulative Effects Assessment (CEA) in the EIA is appropriate.</p> <p><a href="#">The Applicants assessment clearly sets out the methodology and significance of effects arising on users of the PROWs and Bridleway. In relation to cumulative effects this is clearly assessed at para 10.17.1.3 of the LVIA (APP-123).</a></p>	<p><b>The Council disagree</b> 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> <p>The Applicants Expert Witness acknowledged at the Meeting on 15.09.25 that the Cumulative Effects from the Bridleway should have been documented due to the repeated visual effects when experiencing the two substations. This has not been updated or acknowledged in any documentation.</p>	Not agreed
LCC.LVR.20	CEA methodology	<p>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: Environmental assessment methodology (APP-034).</p>	<p>The Council disagrees that the assessment methodology for the CEA has been undertaken in accordance with best practice guidance.</p> <p>The Council considers insufficient weighting and documentation, as recommended in GLVIA3, and as noted for <i>LCC.LVR.19</i>. and detailed in previous comments to the Applicant.</p>	Not agreed
LCC.LVR.21	CEA	<p>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>	<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</p>	Not agreed

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			scenario, either at construction or at completion and has not mitigated sufficiently as a result.	
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"> <li>• People using PRoWs within 1km of the corridors of the export cable or 400 kV cable that would cross the cable corridor, be in proximity to the temporary construction activities and/or pass nearby CEA developments.</li> <li>• 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).</li> </ul> <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>	<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><u>It is unknown whether significant landscape effects would be incurred from the Transmission Assets as the timescale for the Bluefield Solar farm it is understood is currently unknown and other potential development projects along the transmission route could arise over an 8 year+ period.</u></p> <p><u>Should both Substations being constructed concurrently (unknown) would also compound landscape and visual effects.</u></p> <p><b>It is strongly disagreed that visual receptors would not incur significant visual effects over the potential construction period, especially in a worst-case scenario.</b></p> <p><u>LCC stand by their statement.</u></p> <p><u>Would occupiers of Green Bank Farm and Freshfield Farm not experience significant effects during construction?</u></p>	Not agreed
LCC.LVR.23	Assessment of effects	Volume 3, Chapter 10 Landscape and Visual Resources (APP-123) provides an assessment of	<b>The Council strongly disagree</b> that the Applicants have assessed the potential residual	Not agreed

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		<p>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 positions set out in previously written representations.</p> <p><u>One of the principal mitigation measures that has been consistently raised by LCC Landscape is the need for offsite planting provision. The Applicants have repeatedly stated their position on this matter during the examination and refer to their responses at 174.20 of the Applicants' Response to IPs' Submissions at Deadline 5: Lancashire County Council (S_D6_2.4 / REP6-170)</u></p>	<p>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 recommendations, the lack of acknowledgement and addressing of concerns.</p> <p><u>The following aspects in the Applicants' column are not considered to have taken place:</u></p> <p><u>"...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..."</u></p> <p><u>If this had occurred the position would have moved forward.</u></p> <p><b>The Applicants have not repeatedly stated their position re: off site planting.</b> This was not discussed at the meeting with the Applicants Expert Witness 15.09.25 though noted by LCC</p>	

Reference Number	Discussion point	Applicants' position	Lancashire County Council position	Status
			Landscape (The Applicant did acknowledge at ISH4 that they were not proposing off site planting). The NPS's specifically comment and recommend that Applicants may need to carry out off site planting to mitigate effectively. The NPS's also suggest that attenuation ponds could be off site. It is suggested that this should occur to minimise and mitigate as far as is possible the residual effects. This does not result in no effects, simply better design mitigation and reduction of effects.	
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"> <li>• LCA 19a: Coastal Dunes – Fylde Coastal Dunes (landfall); and</li> <li>• LCA 15d: Coastal Plain – Fylde (onshore substations)</li> </ul> <p><u>Visual Receptors</u></p> <ul style="list-style-type: none"> <li>• Viewpoint 1 bridleway BW0505016 south of Morgan onshore substation site;</li> <li>• Viewpoint 3 bridleway BW0505016 west of Morgan onshore substation;</li> <li>• Viewpoint 6 footpath FP050503 south of Morecambe onshore substation site;</li> <li>• Sequential effects on people using PRoW BW0505016, FP050503 and FP050504;</li> <li>• People using beach;</li> </ul>	<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>	Not agreed

Reference Number	Discussion point	Applicants' position	Lancashire County Council position	Status
		<ul style="list-style-type: none"> <li>• People using Blackpool Road Recreation Ground;</li> <li>• People using PRow BW0502012, BW0502013, BW0502016, BW0503012, FP050302, FP05010011, FP050304, FP050305, FP050502, BW0509012, FP00905, FP070907 and FP0709010 (export and 400 kV cables);</li> <li>• People using National Cycle Route 62 at Hillock Lane (export cable); and</li> <li>• 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)</li> </ul> <p>No other significant effects on landscape character or visual receptors would arise during the construction of the Transmission Assets.</p> <p><a href="#">The Applicants have provided evidence, which complies with good practice, to the Examination in relation to the use of the term 'short term' and the interpretation of 'temporary' in their response LCC in document REP4-097 for Q13.1.2 a).</a></p>	<ul style="list-style-type: none"> <li>• Loss to Openness and Views</li> <li>• Loss to rural character, field pattern, trees and ponds</li> <li>• Loss of tranquillity</li> <li>• Loss of Recreational Assets for wellbeing and health</li> </ul>	
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"> <li>• LCA 15d: Coastal Plain – Fylde (Year 1 before landscape mitigation planting has established).</li> </ul>	<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><b><u>Landscape Character</u></b></p>	Not agreed

Reference Number	Discussion point	Applicants' position	Lancashire County Council position	Status
		<p><u>Visual Receptors</u></p> <ul style="list-style-type: none"> <li>Sequential effects on people using PRoW BW0505016, FP050503 and FP050504 (Year 1 before landscape mitigation planting has established).</li> </ul> <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><u>The Applicants note that, in accordance with the guidance set out in GLVIA3, representative viewpoints are selected to inform the LVIA as representation of the landscape and visual resources within the direction and distance from which they are located, and of the type(s) that would be experienced in those areas. The viewpoints therefore provide an assessment of representative effects within each locality, rather than effects that are specific to a single, individual location. Combined with fieldwork undertaken across the study area's extent during both summer and winter months, the LVIA was informed by a comprehensive survey information.</u></p> <p><u>The Applicants note LCC alternative judgements relate to 7 of the 19 viewpoints submitted in support of the LVIA (APP-123). In most cases, LCC's assessments reach conclusions that are typically one level higher than those of the Applicants, with effects notably remaining assessed as Major Adverse after Year 15. The Applicants consider that this approach does not acknowledge any reduction in effects over time</u></p>	<p>LCA 15d: Coastal Plain – Fylde – <b>Major Adverse (significant) at Year 1 and 15.</b></p> <p><u>Visual Receptors</u></p> <p>Viewpoint 1 bridleway BW0505016 – <b>Major Adverse (significant) at Year 1 and 15.</b></p> <p>Viewpoint 2 Strike Lane – <b>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.</b></p> <p>Viewpoint 3 bridleway BW0505016 – <b>Major Adverse (significant) at Year 1 and 15.</b></p> <p>Viewpoint 4 Parrox Lane – <b>Moderate adverse (not significant) at Year 1 and 15.</b></p> <p>Viewpoint 5 footpath FP0509005 – <b>Moderate adverse (not significant) at Year 1 and 15.</b></p> <p>Viewpoint 7 Kirkham Bypass – <b>Moderate adverse (not significant) at Year 1 and 15.</b></p> <p>Viewpoint 12 bridleway BW0505016 – <b>Major Adverse (significant) at Year 1 and 15; where users of the bridleway are closest to Morgan substation.</b></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"> <li>Loss of Openness and Views, particularly to Green Belt areas in which Substation areas are proposed.</li> <li>Loss to rural and landscape character, field pattern and particularly ponds (which should be restored in character with the existing landscape).</li> </ul>	

Reference Number	Discussion point	Applicants' position	Lancashire County Council position	Status
		<p><a href="#">as a result of the establishment of the proposed landscape strategy, which would have some effect on views. Furthermore, the Applicants observe that LCC's alternative assessment does not share its full application of their GLVIA3 methodology and how the various criteria combine to inform overall judgements of Significance.</a></p>	<ul style="list-style-type: none"> <li>• Loss of tranquillity, particularly on PRoW's and Bridleway in vicinity of the Substations.</li> <li>• 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.</li> <li>• 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.</li> </ul> <p>It is considered that the changes to Landscape Character despite being mitigated could never be compensation for the intrinsic loss to a greenfield site, demarcated by managed hedgerows with open and distant views, hence the effects over time may visually change but don't intrinsically change to character.</p> <p>Unfortunately LCC doesn't have a team of landscape professionals at hand, to allow further time to cross every T and dot every i, due to work demands on other projects. LCC has tried to concentrate and focus efforts on those areas which might have the greatest beneficial impact to residents, users and ultimately the landscape.</p>	
<b>Outline Design Principles, Outline Mitigation and Landscape Proposals</b>				
LCC.OMLP.1	Measures (commitments)	<p><a href="#">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</a></p>	<p><b>The Council disagree</b> with the Applicants' position, considering the proposed mitigation and monitoring measures to be insufficient for</p>	Not agreed

Reference Number	Discussion point	Applicants' position	Lancashire County Council position	Status
		<p><a href="#">Outline Landscape Management Plan (document reference J2)</a> are appropriate in the <a href="#">environmental mitigation of potential effects arising from the onshore substations</a>.</p> <p><a href="#">The Applicants refer to the references to the outline Design Principles (document reference J3) (oDP), which elaborates on the information above. It provides to the Examination the pre-consent design position, including a series of layered plans that have informed the modelling of views and the landscape strategy embedded in the documents listed above, and which informed the LVIA. The series of layered plans are illustrated in Section 5 of the oDP.</a></p> <p><a href="#">The oDP was submitted as part of the draft DCO application as a document to be certified and, therefore, to carry weight. It represents a commitment to the post consent design development context. The oDP outlines post consent design codes to inform ongoing design. These design codes have been developed during the Examination period in direct response to meetings with FBC and LCC, along with Project Level Design Principles to more directly relate to the project.</a></p> <p><a href="#">It is normal practice that material submitted at the draft DCO stage is indicative, representing one way the project parameters and design commitments (in this case represented by the design codes and now project level design principles) may be interpreted. The requirement to discharge the design for the substations is clear in the nature of detail required. The design codes have also been developed following discussion with FBC and LCC to more directly relate to the requirement wording to support FBC</a></p>	<p>addressing potential environmental effects from the onshore substations.</p> <p>The Council has little confidence that the Applicant will address landscape and visual concerns sufficiently 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. These would improve views from ProW and the Caravan Park, 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 <a href="#">sufficiently</a> 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> <p><a href="#">Further Commitments are required.</a></p>	

Reference Number	Discussion point	Applicants' position	Lancashire County Council position	Status
		<p><u>in their role as discharging authority in directing the Applicants design submission.</u></p> <p><del>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.</del></p>		
LCC.OMLP.2	Outline Management Plans	<p>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> <p><u>The Applicants recognise the effects identified in the LVIA and consider that assurance to develop the proposed mitigation measures is in place through the certified status of documents.</u></p>	<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. There is little confidence that the ongoing engagement programme on the outline Design Principles and related documents would 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.</p>	Not agreed

Reference Number	Discussion point	Applicants' position	Lancashire County Council position	Status
			frequent and scattered within field areas as currently exists. Visual effects would continue to impact residents, businesses, visitors, recreational users and could be further mitigated.	
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 post consent design and inform the discharge of relevant requirements with specific reference to Section 5 and 6.	<i>"...the Outline Development Principles are high-level and generic and that any such document 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). <b>The Council strongly disagrees</b> 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.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.	As such, it <b>cannot be accepted</b> and presents real concerns that landscape and visual issues would be addressed post consent.	
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.	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.8	Outline Design Principles	The commitment to the preparation of a Compliance Report to be submitted in support of Requirements discharge is supported.	<a href="#">An Independent Design Review Panel would be welcomed to ensure progress in a constructive manner, which addresses concerns raised.</a>	
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.		

Reference Number	Discussion point	Applicants' position	Lancashire County Council position	Status
		<p>Any requirement for an IDRPs should be determined post-consent by the discharging authority, in consultation and agreement with the Applicants.</p> <p>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 programme, enhanced Project Level Design Principles and Design Codes – see Section 6 of the oDP.</p>		

**Appendix B Local Highway Authority's Review of the Proposed Accesses and Proposed Highway Routes.**

Table 1.1 - Detailed Review of Proposed Accesses

ACCESS	Access Location Classification (Urban, Suburban or Rural)	A. Suitable crossing provision proposed (based on likely additional traffic, having regard to good practice)	B. Adequate visibility presented and available	C. Background OS appears accurate	D. No Impact on Hedges & Trees	E. Suitable radii and approach width proposed (based on expected vehicle size)	F. Adequate opportunity for signage	G. Detail on how vehicles will be prevented from crossing the main carriageway	H. Forms part of the proposed routing strategy	Is the access considered safe and suitable having regard to A - H	General Notes and *column specific comments
A1	Urban	✓	N/A*	✓	✓	✓	✓	N/A	✓	✓	Blackpool Council network. * Existing Signalised Access. Not proposed for HGV use.
A2	Urban	✓	✓	✓	✓	✓	✓	N/A	✓	✓	Walk distance improved, crossing provision proposed.
A3	Urban	✓	✓	X	✓	✓	✓	N/A	✓	✓	Walk distance improved, crossing provision proposed. Kerb alignment improved. Provision for clearance of sand on highway within the OCTMP.
A4	Urban	N/A	✓	✓	✓	✓	✓	N/A	✓	✓	Not proposed for HGV use.
A5	Urban	N/A	✓	✓	✓	✓	✓	N/A	✓	✓	Visibility updated. Background OS updated. Lane discipline improved with provision of physical island.
A6	Urban	N/A	✓	✓	✓	✓	✓	N/A	✓	✓	
A7 and A8	Sub-urban	✓	✓	✓	X	✓	✓	X	✓	✓	Good signage needed to prevent rear end shunts
A9a and A9b	Rural	✓	✓	✓	✓	✓	✓	N/A	✓	✓	Crossing movements between A9a and A9b not permitted, and further consideration to be had with regards to Bridleway. Highlighted within OHAMP.
A10 to A13	Rural	N/A	✓	✓	X	✓	✓	N/A	✓	✓	Visibility splays / hedgerow removal and background OS updated.
A14 and A15	Rural	N/A	✓	✓	X	✓	✓	N/A	✓	✓	Visibility splays / hedgerow removal updated.
A16	Access no longer proposed (Ballam Road).										
A17 and A18	Rural	N/A	✓	✓	X	✓	✓	N/A	✓	✓	Visibility splays / hedgerow removal updated.
A19	Rural	N/A	✓	✓	X	✓	✓	N/A	✓	✓	Visibility splays / hedgerow removal and radii updated.
A21 to A24	Rural	N/A	✓	✓	X	✓	✓	N/A	✓	✓	Visibility splays / hedgerow removal updated, speed surveys provided.
A25 to A28	Rural	✓	✓	✓	X	✓	✓	N/A	✓	✓	Visibility splays / hedgerow removal, background OS updated and radii updated. Walk distance improved, crossing provision proposed.
A29 to A32	Rural	N/A	✓	✓	X	✓	✓	N/A	✓	✓	Visibility splays / hedgerow removal updated, speed surveys provided. Accesses off private highway.
A33	Rural	N/A	✓	✓	X	✓	✓	N/A	✓	✓	Visibility splays / hedgerow removal updated, speed surveys provided. Kerblines amended. Supporting link and access requires management (within OCTMP)
A34 to A37	Rural	N/A	✓	✓	X	✓	✓	N/A	✓	✓	Visibility splays / hedgerow removal and radii updated, speed surveys provided.
A38 to A41	Rural	N/A	✓	✓	X	✓	✓	N/A	✓	✓	Proposals updated to signalised crossing points.
A42 and A43	Rural	✓	✓	✓	X	✓	✓	N/A	✓	✓	Visibility splays / hedgerow removal and radii updated. Walk distance improved, crossing provision proposed. Further detail on drainage required at detailed design due to existing flooding.

<b>ACCESS</b>	Access Location Classification (Urban, Suburban or Rural)	A. Suitable crossing provision proposed (based on likely additional traffic, having regard to good practice)	B. Adequate visibility presented and available	C. Background OS appears accurate	D. No Impact on Hedges & Trees	E. Suitable radii and approach width proposed (based on expected vehicle size)	F. Adequate opportunity for signage	G. Detail on how vehicles will be prevented from crossing the main carriageway	H. Forms part of the proposed routing strategy	Is the access considered safe and suitable having regard to A - H	General Notes and *column specific comments
A44 to A47	Rural	N/A	✓	✓	X	✓	✓	N/A	✓	✓	Visibility splays / hedgerow removal updated, speed surveys provided. Strong signage scheme required to reduce speeds.
A48	Rural	N/A	✓	✓	X	✓	✓	N/A	✓	✓	Visibility splays / hedgerow removal updated, layby to be removed reduced.
A49	Rural	N/A	✓	✓	X	✓	✓	N/A	✓	✓	Visibility splays / hedgerow removal updated.
A50	Rural	✓	✓	✓	X	✓	✓	N/A	✓	✓	Visibility splays / hedgerow removal and crossing provision updated.
A51	Rural	N/A	✓	✓	X	✓	✓	N/A	✓	✓	Visibility splays / hedgerow removal updated.
A52 and A53	Rural	✓	✓	✓	X	✓	✓	N/A	✓	✓	Visibility splays / hedgerow removal updated.
A54	Not Used										
A55	Rural	✓	✓	✓	X	✓	✓	N/A	✓	✓	Visibility splays / hedgerow removal and radii updated.
A56	Rural	✓	✓	✓	✓	✓	✓	N/A	✓	✓	Visibility splays updated.
A57	Access no longer proposed (Guild Wheel).										
A58	Leisure	N/A	✓	✓	✓	✓	✓	N/A	✓	✓	Access off private highway. Layby to be provided on Link.
A59 to A61	Rural	N/A	✓	✓	X	✓	✓	N/A	✓	✓	Supporting link and accesses require management (within OCTMP).
A62	Rural	✓	✓	✓	✓	✓	✓	N/A	✓	✓	Footway/cycleway tie in updated.
A63	Urban	✓	✓	✓	✓	✓	✓	N/A	✓	✓	Walk distance improved, crossing provision proposed.
A01	Rural	N/A	✓	✓	X	✓	✓	N/A	✓	✓	Visibility splays / hedgerow removal updated.
A02	Rural	N/A	✓	✓	X	✓	✓	N/A	✓	✓	Visibility splays / hedgerow removal updated. Not proposed for HGV use.

Table 1.2 - Detailed Review of Proposed Routing Strategy

ROUTE (LINK ID)	A. Approximate width of the existing (usable) carriageway (excluding parking bays and cycleways) (taken from Mapping software)	B. 2027 Base daily HGV flows (taken from Table 7.21 of ES Volume 3, Chapter 7)	C. Peak daily construction HGV flows (taken from Table 7.21 of ES Volume 3, Chapter 7)	D. Simultaneous 2-way HGV movement can be accommodated on the link	E. Swept Path Analysis provided for the route	F. Pedestrian, cyclists and equestrian demand identified	G. Overrun does not occur	H. Sufficient waiting areas along the route	I. Link not susceptible to Surface Water Flooding	Is the route considered suitable for HGVs, having regard to A - I	General Notes and *column specific comments	
Link 1	8.6 - 10m	132	0	Not proposed to be used by HGVs					X	N/A		
Link 2	3.6m (1way)	151	0	Not proposed to be used by HGVs					X	N/A		
Link 3	9 - 10m	57	0	Not proposed to be used by HGVs					X	N/A		
Link 4	11.5m	32	0	Not proposed to be used by HGVs					✓	N/A		
Link 5	8.5m	86	0	Not proposed to be used by HGVs					✓	N/A		
Link 6	10 - 11.5m	184	0	Not proposed to be used by HGVs					X	N/A		
Link 7	>15m	519	0	Not proposed to be used by HGVs					X	N/A		
Link 8	Not Used									N/A		
Link 9	10.8m	381	47	✓	N/A	X	✓	N/A	✓	✓		
Link 10	7.8m*	0	0	Not proposed to be used by HGVs					X	N/A	* On-street parking reduces CW to 3.6m.	
Link 11	>15m	284	47	✓	N/A	X	✓	N/A	X	✓		
Link 12	6.8m	826	0	Not proposed to be used by HGVs						N/A		
Link 13	>15m	533	47	✓	N/A	X	✓	N/A	X	✓		
Link 14	>15m	1060	198	✓	N/A	X	✓	N/A	X	✓		
Link 15	Not Used									N/A		
Link 16	>15m	1229	198	✓	N/A	X	✓	N/A	✓	✓		
Link 17	8 - 10m	245	47	✓	N/A	X	✓	N/A	X	✓		
Link 18	7.9m	32	0	Not proposed to be used by HGVs						N/A		
Link 19	8.8 - 9.2m	101	0	Not proposed to be used by HGVs						N/A		
Link 20a	6.8-7.1m	196	186	✓	N/A	X	✓	N/A	X	✓*	* May require restrictions due to capacity issues during peaks. Blackpool EZ significant highway works may influence suitability of route whilst works are ongoing.	
Link 20b	6.8-7.1m	196	107	✓	N/A	X	✓	N/A	✓	✓*	* Significant highway works (yet to commence) at the Kilnhouse Lane junction may influence suitability of route whilst works are ongoing (linked to works associated to development currently being built out).	
Link 21	Not Used									N/A		
Link 22a	7.1 - 7.8m	171	107	✓	N/A	X	✓	N/A	X	✓		
Link 22b	7.3*	6	107	✓	N/A	X	✓	X	X	✓	* On-street parking reduces carriageway. Management of on street parking included in OCTMP.	
Link 23	7 - 7.2m	300	0	Not proposed to be used by HGVs						N/A		
Link 24	7.2 - 8.2m	162	0	Not proposed to be used by HGVs						N/A		
Link 25	7.3m	82	0	Not proposed to be used by HGVs						N/A		
Link 26	7.2 - 7.5m	82	21	✓	N/A	X	✓	N/A	X	✓		
Link 27	Not Used									N/A		
Link 28	7.2 - 7.5m	129	21	✓	N/A	X	✓	N/A	X	✓		
Link 29	>15m	323	55	✓	N/A	X	✓	N/A	✓	✓		
Link 30	5.5 - 6m	10	0	Not proposed to be used by HGVs						✓		
Link 31a	5.5 - 6m	11	38	✓	✓	✓	X	✓	✓	✓	Mitigation and management measures included in OCTMP.	
Link 31b	5.7m*	11	0	Not proposed to be used by HGVs						N/A	* On-street parking on Park View Road reduces CW to 4.3m.	
Link 32	Not Used									N/A		
Link 33	Not Used									N/A		
Link 34	Not Used									N/A		
Link 35	Not Used									N/A		
Link 36	Not Used									N/A		
Link 37	5.5 - 9.1m	64	0	Not proposed to be used by HGVs						N/A		
Link 38	Not Used									✓	N/A	
Link 39a	5 - 6.5m	63	23	✓	✓	✓	X	✓	✓	✓	Mitigation and management measures included in OCTMP.	
Link 39b	5 - 5.5m	63	13	✓	✓	✓	X	✓	✓	✓	Mitigation and management measures included in OCTMP.	
Link 39c	4.5 - 5m	N/A	N/A	X	✓	✓	X	X	✓	✓	Mitigation and management measures included in OCTMP.	
Link 40	Not Used									N/A		
Link 41	5 - 6.5m	16	105	✓	✓	✓	X	✓	✓	✓	Mitigation and management measures included in OCTMP.	
Link 42	9.3 - 10m	156	34	✓	X	X	✓	N/A	✓	✓		

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Link 43a	6 - 6.3m	56	172	✓	✓	✗	✓	N/A	✓	✓	
Link 43b	5.3 - 6.3m	56	108	✓	✓	✓	✗	✓	✓	✓	Mitigation and management measures included in OCTMP.
Link 44	Not Used									N/A	
Link 45	5.3 - 6m*	90	0	Not proposed to be used by HGVs						N/A	* On-street parking reduces CW to 4m
Link 46	4.7 - 6.3m	107	110	✓	✓	✓	✗	✓	✓	✓	Mitigation and management measures included in OCTMP.
Link 47	5.5 - 8m	101	0	Not proposed to be used by HGVs						N/A	
Link 48	Not Used									N/A	
Link 49	7 - 9m	302	0	Not proposed to be used by HGVs						N/A	
Link 50	9 - 9.3m	304	143	✓	✗	✗	✓	N/A	✗	✓	
Link 51	7 - 7.5m	352	214	✓	✗	✗	✓	N/A	✓	✓	
Link 52	12 - >15m	273	117	✓	✗	✗	✓	N/A	✗	✓	
Link 53	5.5 - 7.5m	90	60	✓	✓	✗	✓	N/A	✓	✓	
Link 54	5 - 5.5m*	52	0	Not proposed to be used by HGVs						N/A	* On-street parking on Kirkham Road reduces carriageway to 4.3m
Link 55	8 - >15m	140	0	Not proposed to be used by HGVs						N/A	
Link 56	Not Used									N/A	
Link 57a	>15m	241	209	✓	✗	✗	✓	N/A	✓	✓	
Link 57b	>15m	241	209	✓	✗	✗	✓	N/A	✓	✓	
Link 58a	>15m	418	209	✓	✗	✗	✓	N/A	✓	✓	
Link 58b	>15m	418	209	✓	✗	✗	✓	N/A	✓	✓	
Link 59	Not Used									N/A	
Link 60	Not Used									N/A	
Link 61a	13m	116	88	✓	✗	✗	✓	N/A	✗	✓	
Link 61b	11 - 13m	116	88	✓	✗	✗	✓	N/A	✗	✓	
Link 61c	10 - 12m	116	88	✓	✗	✗	✓	N/A	✗	✓	
Link 61d	12m	116	88	✓	✗	✗	✓	N/A	✓	✓	
Link 62	Not Used									N/A	
Link 63	5.5 - 6m	23	16	✓	✓	✗	✓	N/A	✓	✓	
Link 64	Not Used									N/A	
Link 65a	13m	660	290	✓	✗	✗	✓	N/A	✓	✓	
Link 65b	11.5m	660	290	✓	✗	✗	✓	N/A	✓	✓	
Link 65c	>15m	660	290	✓	✗	✗	✓	N/A	✓	✓	
Link 66	Not Used									N/A	
Link 67	>15m	990	313	✓	✗	✗	✓	N/A	✗	✓	
Link 68	>15m	1156	313	✓	✗	✗	✓	N/A	✗	✓	
Link 69	7m	67	0	Not proposed to be used by HGVs						N/A	
Link 70	>15m	1163	313	✓	✗	✗	✓	N/A	✗	✓	
Link 71	>15m	704	101	✓	✗	✗	✓	N/A	✗	✓	
Link 72	3.6 - 14m	205	101	✓	✓	✓	✗	✓	✓	✓	Mitigation and management measures included in OCTMP.
Link 73	M55	4683	568	Strategic Road Network						N/A	
Link 74	M55	7511	568	Strategic Road Network						N/A	
Link 75	M55	4360	345	Strategic Road Network						N/A	
Link 76	M55	2566	151	Strategic Road Network						N/A	
Link 77	M6	11758	445	Strategic Road Network						N/A	
Link 78	M6	16262	668	Strategic Road Network						N/A	
Link 79	M6	21560	668	Strategic Road Network						N/A	
Link 80	M6	21898	668	Strategic Road Network						N/A	
Link 81	M61	8227	668	Strategic Road Network						N/A	
Link 82	M65	7353	445	Strategic Road Network						N/A	
Link 83	M61	7010	445	Strategic Road Network						N/A	
Link 84	M65	5734	143	Strategic Road Network						N/A	
Link 85	M6	13307	668	Strategic Road Network						N/A	
Link 86	Not Used									N/A	
Link 87	M6	15711	445	Strategic Road Network						N/A	
Link 88	Not Used									N/A	
Link 89	Not Used									N/A	

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Link 90	>15m	-	-	Not proposed to be used by HGVs						N/A	
Link 91	>15m	2308	143	✓	✗	✗	✓	N/A	✗	✓	
Link 92	>15m	2156	143	✓	✗	✗	✓	N/A	✗	✓	
Link 93	7m	1179	143	✓	✗	✗	✓	N/A	✗	✓	
Link 94	7.2 - 9m	804	143	✓	✗	✗	✓	N/A	✓	✓	
Link 95	7.2m	559	143	✓	✗	✗	✓	N/A	✗	✓	
Link 96	7.1 - 7.5m	462	143	✓	✗	✗	✓	N/A	✓	✓	
Link 97	11.2m	663	143	✓	✗	✗	✓	N/A	✓	✓	
Link 98	>15m	1051	143	✓	✗	✗	✓	N/A	✓	✓	
Link 99	>15m	657	143	✓	✗	✗	✓	N/A	✓	✓	
Link 100	8 - 11m	45	79	✓	✗	✗	✓	N/A	✓	✓	
Link 101	5 - 6.1m	13	79	✓	✓	✓	✗	✓	✗	✓	Mitigation and management measures included in OCTMP.
Link 102	5.5* - 7m	1	14	✓	✓	✓	✗	✓	✓	✓	Mitigation and management measures included in OCTMP.