

Thank you for the opportunity to raise my comments and concerns on the proposed Morgan & Morecambe projects. The points I wish to raise are:

Design & Delivery Resourcing

If the Morgan & Morecambe projects are approved there needs to be a requirement placed on the projects to staff the project teams with people with the relevant experience and to use appropriate processes to ensure that both the short term and long-term damage to farmland and the wider environment is minimised.

It is essential that it isn't just that the project documents say they will do what is necessary but that they actually do what is required and do it properly. This requires the project teams to include people with the appropriate experience and understanding of the work required and the environments involved to both develop the plans and do the actual work, with a suitable oversight process in place to check the projects do what they have committed to.

As an example, the project teams need to include people with the relevant experience and understanding of repairing and reinstating land drains to do the drainage work and also for there to be a review process that checks that it is done correctly.

Sadly, the experience so far is that the project does not always deliver on what their own documents say. I don't know whether that has been due to not having people with the right knowledge and experience or trying to save money. I am concerned that if the approach the project has adopted so far is allowed to continue in the future there will be severe and long-lasting damage to the land and environment that could otherwise be avoided.

Design Parameters

It is very concerning that the applicants are asking for the DCO to be granted without committing to minimum and maximum design parameters on all the key parameters that will have fundamental long-lasting impacts on the environment and local communities.

One specific example of this is the design parameters for the cable depths should be specified and not "indicative". The depth of the cables is a critical parameter for agricultural land as the depth of cables impacts the ability to reinstate and maintain land drains that are essential to the management of agricultural land. Failure to ensure the cables are deep enough will make it impossible to restore the land to the same condition and will likely render it impossible to continue to farm in the same way. Given the applicants are justifying the TP on grounds it will be returned to agricultural usage the minimum and maximum cable depths must be specified.

The DCO should also include a commitment for the applicants to work within each limit in the DCO.

Sequential Delivery

Sequential delivery of the proposed projects means the impact on road links, environment, communities and businesses will be protracted for up to 10 years. Many roads and plots of land are impacted by the construction activity, construction traffic and compounds for both projects and will therefore be significantly disrupted for up to 10.

There are many fields along the cable corridor that are impacted by the compounds, haul roads and cable trenches for both projects. So, for many farms there will a significant proportion of the farm land that will be out of production and unavailable to be farmed for the duration of both projects, so potentially over 10 years after allowing for reinstatement work and the land recovering. This fundamentally undermines the viability of continuing to operate the farm business even if the land can be restored to viable agricultural land after all the construction is completed. As a significant amount of the farm land in the Fylde is impacted there will be shortage of silage and grazing in the area so there will be consequences for many more farm businesses than just the land subject to the CA and TP orders.

During Open Floor Hearing 1 (OFH1) and Issue Specific Hearing 1 (ISH1) the applicants placed great emphasis on the benefits that had arisen so far from the two projects working as a joint project. There is no benefit to the local communities and businesses if the design, construction or ongoing maintenance phases of the projects do not operate as a joint project with concurrent activity. The DCO should include a commitment to concurrent and coordinated development and construction phases to reduce the impact on the local communities, businesses and environment.

Alternative Route

At the OH1 and ISH1 details were raised of a materially alternative route that would have significantly less impact on the environment and communities, be cheaper to deliver and be consistent with the development plans for the Hillhouse site. Is it reasonable that the DCO is put forward for consent and that CA and TP orders are sought when the alternative route has not been assessed?

The project teams clearly feel they are committed to the current proposed route because they have invested 3 years work into it. Given the scale of the impact on the environment and communities in the scope area it is essential that time is taken at this stage to properly consider this alternative with further engagement with National Grid.

Funding Statement

I am concerned by the uncertainty around the identity & nature of the legal entities that will in the future be sponsoring the projects. Without the information being available how is it possible to carry out the necessary due diligence on the financial & counterparty risk that will be triggered by the DCO being granted?

Will the DCO be subject to review by the Secretary of State on a change of control of the project companies?

Timing of DCO application

It is concerning that the applicants are pressing ahead with the DCO while there are material and significant issues outstanding.

- Is it reasonable that the DCO is put forward for consent and that CA and TP orders are sought when the materially alternative route has not been assessed?
- It does not seem sensible for the DCO for these projects to be considered before the National Grid plans for connecting in the additional power supplies from the new Wind Farms are confirmed. For example, these projects have a critical dependency on the Penwortham power Station, should the consent for the M&M projects not be given after the proposed extension of the Penwortham power station has been approved?
- Should the application for the DCO be paused until the identity, nature and financial strength of the firms that will behind the projects is known?