

JOHN FORRESTER

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The Planning Inspectorate
National Infrastructure Directorate
Temple Quay House
Temple Quay
Bristol
BS1 6PN

Our Ref: JFJ/JGB/deH152a/b

14th May 2025

Dear Sir/Madam,

Tallentine Limited and de Hoghton Estate (20053958) – Morgan & Morecambe Offshore Wind Farm Development Consent Order Application Reference: EN020028

We act as Agents for the Directors of Tallentine Limited and the Trustees of the de Hoghton Settled Estate - Lancashire Trust owners of Old Hall Farm, Lea, Preston, Title Nos. LAN183360, LAN136463 & LAN137796 extending approximately 62.5ha (154.44 acres) or thereabouts which will be affected by the Proposed Morgan and Morecambe Offshore Windfarm Development Consent Order (DCO). This representation is made pursuant to Section 56 of the Planning Act 2008 and in accordance with the Planning Inspectorate's Advice note 8.2.

Our representations are set out as under:

1. Clients Affected Land/Property.

- 1.1 Tallentine / de Hoghton Estate have been the freehold owner of the land referred to since the 1400's. The land is currently let on Farm Business Tenancy and is used for the grazing of cattle, arable and root crop production and is Grade II, highly productive land within a 'ring fenced' setting. The land is also subject to a shooting rights agreement.
- 1.2 The land is to be directly impacted by the proposed onshore cable route, with associated easements extending to 831m and 1019m, a potential compulsory acquisition of 29.83 acres of land for 'Ecological Mitigation', and an additional 59.47 acres of the Saltmarsh to be occupied by way of a lease for Ecological Mitigation during the construction stages.
- 1.3 The property includes a nationally important Grade I Listed Farmhouse (List Number **1361663**) subject to a residential tenancy and separate No. 2 Grade II Listed Stable Block and Barn (List Numbers **1073511 & 1317477**) together with yard areas and the other buildings, subject in part to an Agricultural Tenancy, which will be affected, where the construction traffic is proposed to access the Yard areas at Lea Old Hall Farm. The access route proposed is through a tight 90 degree bend passing directly to the south of the Stable Block. The heavy equipment presents a risk of damage through impact and vibration to the buildings and infrastructure. The works will injuriously affect the tenants living at Lea Old Hall Farmhouse, and the agricultural and shooting tenants.
- 1.4 The proposed works, including cable installation and permanent easements, will restrict access and use, potentially causing significant operational and financial disruption to the Landowner and its tenants.

Director:
John Forrester MRICS
Regulated by RICS

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6855602

1.5 The proposal will reduce the shooting rights available over the land as the proposal seeks to acquire land in the middle of the ring fence affecting the feasibility of the ability to shoot over the whole holding should the scheme proceed. The shooting rights generate a modest income for the Landowner and by losing parcels of land within middle of the ring fence, this reduce the feasibility of being able to provide suitable shooting for the shooting tenant.

2. Concerns regarding the Development.

- a. Compulsory Acquisition of Land to be used for Ecological Mitigation. The land proposed to be acquired to be used for Ecological Mitigation is Grade II best and most versatile productive land. Reviewing the Onshore Biodiversity Benefit Statement, the proposed mitigation is the creation of neutral grassland habitat. We would request that the Planning Inspectorate consider other land in the area, which could be provided of lower quality, which does not have the productive capacity of the current land proposed.
- b. The compulsory freehold acquisition of land for a project with a design life and expected life of 30 – 60 years is considered to be unacceptable. As noted above, the land has been in the same ownership for over 600 years, and our clients are not inclined to relinquish their title for a project with an expected maximum life of 60 years.
- c. The Onshore Biodiversity Benefit Statement does not sufficiently address the long-term loss of productive land, nor undertakes an analysis of why the land has been chosen.
- d. Potential Damage to Historic Assets at Lea Old Hall Farm.
- e. Potential Security Concerns for the Historic Assets at Lea Old Hall Farm.
- f. Potential impact of cables and above-ground structures relating to the agricultural operations over the best and most versatile land.
- g. The scheme's impact, for future infrastructure development, specifically an extension of the Preston Western Distributor Road. With the completion of Edith Rigby Way, and the Penwortham Bypass, and given the persistent issues of traffic/congestion, the requirement for a new bridge over the River Ribble is vital and would provide significant public benefit. The Planning Inspectorate should ensure that the route of the cable and environmental allocation will not impact the ability to build the bridge or add additional costs for the highway authority to any proposal due to the proposed scheme.

3. Proposed Resolution and Mitigation

Discussions are ongoing with the Applicant regarding the occupation of the land by way of a lease rather than a Freehold Acquisition. We believe that the requirements set out for the Ecological Mitigation could be provided by way of a lease, and therefore the possible compulsory purchase of land for ecological mitigation should not be permitted if suitable terms can be agreed. However, we do believe that the impact of loss of best and most versatile land, should be addressed, through exploring off-site ecological mitigation or enhance existing habitats elsewhere.

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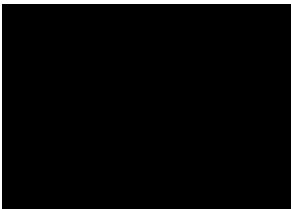
Should the scheme proceed, we would request that a new point of access is created off Blackpool Road to bypass Lea Old Hall Farm to ensure that all construction traffic is kept away from the listed buildings, reducing the likelihood of damage/ trespass.

The location of the above ground structures should be agreed, prior to commencement of the works to ensure that the locations have minimal impact on agricultural operations, with the value of the land to be agreed and paid, prior to the commencement of the development.

4. Whilst our client supports the broader objectives of renewable energy development, the current DCO proposal disproportionately impacts their land. We urge the Examining Authority to ensure that the applicant fully justifies the need for compulsory acquisition, explores less invasive alternatives, and provides fair compensation. We are open to constructive dialogue with the applicant to reach a negotiated settlement, as encouraged by the Planning Act 2008, to avoid the need for compulsory measures.

Please confirm receipt of this representation and provide details of the next steps in the examination process. All correspondence should be directed to Tallentine Limited / Trustees of the de Hoghton Settled Estate - Lancashire Trust C/O John Forrester Limited. We understand that personal data and representations will be made publicly available, as noted in Advice Note 8.2, and consent to this subject to the redaction of sensitive information.

Yours sincerely,



James G. Bramley Bsc. (Hons) FAAV

Acting for and on behalf of John Forrester Limited