

**MORECAME AND MORGAN OFFSHORE WIND FARMS PROJECT****Reference Number: 20053031****Representations on behalf of Mr Paul Hamilton Ellis and Paul Hamilton Ellis as current sole owner of land previously owned by himself and Patrick Frank Ellis in respect of the Development Consent Order for deadline one.****Representations Lodged by P D Dennis FRICS, FAAV of** [REDACTED]

As Agents we wish to lodge representations on behalf of the above Landowner in respect of the proposed Morecambe and Morgan Offshore Wind Farms Development Consent Order.

1. There has been a lack of consultation on the Scheme to Landowners, Occupiers with limited discussions regarding access, cable routes, drainage, land restoration, surface apparatus (eg. jointing chambers) and land uses.
2. There is a lack of transparency. It is stated within the Preliminary Environment Information Report that feedback received on the Options promoted at the Statutory Consultation would be used to refine the route planning and site selection process further and also that the route was further refined following feedback from the Statutory Consultation however, we were notified by the Projects Agents prior to the close of the Statutory Consultation that the route had been decided. This means that some feedback from the Statutory Consultation could not have been considered when deciding on and refining route planning and site selection. There has been no discussion on the possible siting of the cable corridor slightly to the south and following submission of the DCO application the Project have indicated that they cannot amend the route.
3. We raise the question as to whether it is appropriate for one DCO to be considered for two projects. As each Project has differing effects on areas of land Landowners and the population in general surely it would be appropriate for each to be considered in isolation. The two companies promoting the DCO are purporting to work together but there does not appear to be any commitment to work together during the construction period. We request that the Planning Inspectorate impose conditions on the promoters to work together further in terms of route location within the corridor defined to ensure that both routes are located as close together as possible to avoid creating blighted strips between the two corridors and also to coordinate construction in order to minimised disruption.
4. We believe that whilst there is a proposed Code of Construction Practice there is no absolute commitment that this will be strictly complied with and we request that the Planning Inspectorate impose a condition on the Developers requiring them to comply with the Code of Construction Practice.

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5. We are concerned regarding defects to the Code of Construction Practice and specifically highlight inter alia the requirement for a strict prohibition on the pumping out/dewatering onto adjoining land and or allowing water to flow from the construction site onto adjoining land, the proposed storage heights for topsoil is too high leading to defects in the structure of the topsoil and we also suggest a strict prohibition on the removal of topsoil from any one Landowners property.

6. We note that the Companies are recently incorporated and bearing in mind that we have been notified that much of the funding/financial backing would come from BP we are also aware that BP have indicated that they are now pulling out of green energy projects and we would ask the Planning Inspectorate to closely question and ascertain whether the Companies have sufficient financial backing to complete the Project or whether it is simply something which they will be looking to make a quick buck and pass on, if the latter we would strongly urge the Planning Inspector to refuse the DCO.

7. As at the date of writing these representations (13<sup>th</sup> May 2025) we do not have a Heads of Terms from either of the Projects for our clients consideration despite having entered into extensive discussions as part of the Land Agency Group.

8. We have had meetings with the Project and our clients and in the latest meeting (end of March) the Project indicated that the widths required for the Works are a worst case scenario and could well be narrower. We believe that if the Inspector is minded to grant the DCO this should be on the basis of what is actually needed and not the Project's wish list which they describe to Landowners as their worst case scenario. We therefore feel that further information should be now made available with respect to the actual widths needed for the scheme together with location and size of surface apparatus.

9. It would appear that the Project have either failed to notice the construction of Lytham St Annes Way (a road constructed between 2021 and 2024 and opened in June 2024) which is on the eastern boundary of our clients land or ignored the impact of its construction. Following the construction of this road the access points to our clients land from the public highway are now different to those previously and no account of this appears to have been taken place in the design and location of the access points requested by the Project onto our clients land. In particular we believe that Plot 05-044 together with the other relevant plots adjoining it should be removed to the north to the access point direct off the public highway into Plot 05-052a and 05-051b. Likewise the operational access being Plots 05-057 and 05-054 should be amended.

E&OE We reserve the right to amend or add to this submission.