



P Wilson & Company
Chartered Surveyors

**Planning Act 2008 - Section 88 and 89
and the Infrastructure Planning (Examination Procedure) Rules
2010 - Rules 469 & 13**

**Application by Morgan Offshore Wind Limited and Morecambe
Offshore Wind Ltd for an Order granting Development Consent for
the Morgan and Morecambe Offshore Wind Farm
Transmission Assets**

Planning Act 2008 Application by Preliminary Hearing

Further Submissions on behalf

of

**Mrs Christine Fare
Mr John Fare
& Fare Farms Limited**

of



**Interested Party Numbers – Mrs Christine Fare (20052304)
Mr John Fare (20052302) and Fare Farms Limited (20052306)**

**By
Andrew T Coney (20051124) P Wilson & Company**

1. Background

I attach under the Appendices to these further Submissions, my initial Submissions to the Inspectorate dated 11th April 2015.

2. Further Submissions

My initial Submissions stand and the concerns expressed therein remain. The basis on which the DCO Application has been made is fundamentally flawed and their delivery is therefore, in my Submission, uncertain.

The rationale for that statement can be summarised as follows –

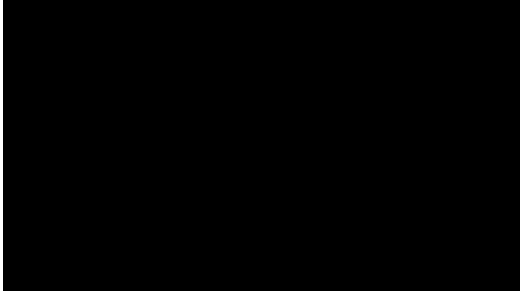
- Uncertainty around compulsory acquisition, temporary possession and the timing and delivery of both Schemes and whether they will be delivered in parallel consequentially.
- Acknowledging that I and my clients are not ecologists, the ecological survey is not yet complete and, therefore, we fail to understand how a proper assessment has been made of the ecological issues in the Scheme's routing and design.
- The visual impact on planning terms of the sub-stations to be situated in Freckleton has not been adequately assessed and in our view, have an unacceptable affect on a Greenbelt in this part of the Fylde given their scale, location and design.
- It is therefore our view the selection processes for the siting of the sub-stations is fundamentally flawed.

The impact of the Scheme on my client's business and them personally is going to be significant and whilst and they acknowledge many of those matters can be dealt with by compensation, my clients would far rather this Scheme didn't proceed and left them to continue to run their business unaffected.

Feelings that are exacerbated when you believe there are fundamental flaws, as outlined above, in the design of the Scheme, its routing and siting and the manner in which it is being delivered.

3. Conclusion

The above is a further summary of the issues and concerns that my clients have in respect of the Scheme and I further reserve the position to make further Submissions in respect of matters scheduled here in subsequently at the Compulsory Acquisition Hearing and the affect of the Scheme on my client's property.



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Andrew T Coney, P Wilson and Company LLP
Duly authorised Agent to: Mrs Christine Fare, Mr John Fare & Fare Farms Limited

16 May 2025



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1. Introduction

I act on behalf of the above who live on [REDACTED] and whose Farm is significantly affected by the above Schemes and in particular the Sub-Stations and cable routes in and out of them and to illustrate that I attach two plans – plan A, showing the extent of my client's land ownership and occupation, noting in part that they are owners of land as well as tenants, their landlords being the Trustees of the Hornby Newton Charity (represented by others) and the second an indicative plan of the Scheme so far as it affects my client's land (Plan B).

In simple terms, approximately two thirds of my client's land and, therefore, business is affected by the proposals set out in the Draft DCO by the above Schemes.

It is, and will be, my submission on behalf of my clients that their business as currently constituted, being a paddock grazed Dairy Farm – a sustainable food production unit with low carbon footprint and high biodiversity, will have to cease if this Scheme receives consent and the DCO is confirmed and the Schemes are constructed.

I am unable due to prior commitments to attend virtually or in person, the Preliminary Hearing or the Specific Hearing 1 or the Compulsory Acquisition Hearing 1 all scheduled for the 29th and 30th April and the 1st and 2nd May 2025.

I am therefore instructed by my clients to send these written Submissions to you Sir and the other members of the Examining Authority for your information and consideration.

2. Submission

In response Sir, to your Rule 6 Letter dated 28th March 2025 in respect of the above Schemes, I have registered via the online portal for your Preliminary Meeting and have submitted these representations via that portal as well as by email direct to the Planning Inspectorate.

A. Assessment of Principal Issues

Using Appendix C to your Rule 6 letter as an Agenda and the initial of Assessment of Principal Issues to be considered by the Examining Authority in respect of the Development Consent Order, I make the following submissions on behalf of my clients.

2.1 Aviation

None.

2.2 Compulsory Acquisition and Temporary Possession

It is my submission on behalf of my clients that the extent of the land required under powers sought under the draft DCO render my client's business as incapable of continuation should the draft DCO be confirmed and the Scheme proceed.

The impact of these Schemes, as proposed, will therefore be devastating for my client's business and their property and will require the closure of the business.

These are issues that are compounded by the implications of two separate Projects, potentially on different timescales with two easements and one DCO. The uncertainty that that is providing render the planning for such a Project and the impact on my client's business is impossible. My clients cannot adequately prepare for the Schemes given the uncertainty that surrounds the delivery of those Schemes and the timescales thereof.

That uncertainty is causing distress, worry and makes the managing and planning of farming business going forward over the next few years virtually impossible.

2.3 Ecology

Whilst not ecologists, it is clear to the layman that the Project have not completed their ecological assessments in respect of the Schemes evidenced by their ongoing requests for further ecological and intrusive surveys necessary throughout the forthcoming calendar year and, therefore, it would be my submission that the Scheme have not yet adequately addressed the ecological impacts of their proposal and that the DCO process is being driven by Grid connection dates imposed by National Grid on the Scheme rather than the proper assessment of the Schemes and the implications thereof.

It is interesting to note that both the Morecambe and Morgan Sub-Station sites were selected at Freckleton before any formal ecology surveys had been undertaken on my client's property and to their knowledge, on surrounding properties affected by those

Sub-Stations and therefore that site selection process has to be questioned as to its validity from an environmental perspective.

2.4 Flood Risk, Groundwater and Surface Water

It would be my client's submission and concern that given the level of infrastructure being constructed on their property there is a serious risk of run off water increasing local flooding.

2.5 General Matters

It is my client's submission that the Project's approach to construction scenarios and co-ordination between the Projects is inadequate and as yet, their approach to construction, compounds, programming, timing and delivery of the works are unknown and their processes are being driven again by connection dates supplied by National Grid and the desire to achieve a DCO approval without first adequately assessing the impact of the Schemes on the local area, the environment and the people and businesses that will be affected by the proposal.

2.6 Greenbelt

My client's property is situated within the Greenbelt so far as the Schemes are proposed save as to a very small area that is situated within Countryside Area and is, therefore, the land affected is afforded the Protective Policies that the Fylde Borough Local Plan affords to such identified areas.

It would be my submission on behalf of my clients that the Scheme has failed to demonstrate that the design and location of the Sub-Stations at Freckleton has met the Greenbelt requirements or demonstrated that the very special circumstances exist that should mean that they should be an exception to that Greenbelt Policy.

2.7 Historic Environment

No comment.

2.8 Land Use and Recreation

As scheduled in my preliminary comments above, the affect of the proposals here on the agricultural land that comprises my client's farm, its soil quality and associated farming operations and therefore my client's business here by these proposals and the uncertainty surrounding their delivery will have a devastating effect and require the closure of my client's current farming business. This has been brought to the attention of the Schemes in conversations with them over the last many months and I reserve the right to make further submissions in this respect at a later date in the further Compulsory Acquisition and Site Specific Hearings.

2.9 Landscape

My submissions here are that the design and appearance of the Onshore Sub-Stations included within the Application do not meet the Greenbelt or other acceptable design criteria.

2.10 Marine Physical Processes and Coastal Change

No comment.

2.11 Noise and Vibration

The operational effects and construction effects of this Scheme on my client's business, property, and livelihood and home environment will be devastating and will require the closure of his existing farming business as scheduled above.

2.12 Other Offshore Matters

No comment.

2.13 Social Economic Effects on Human Health

As scheduled above, the uncertainty surrounding the delivery of this Project – will the DCO be approved and if so, how will the Scheme be constructed and over what timescales – are having significant impact on my client's human health and mental wellbeing.

B. Specific Hearing 1

2.14 Agenda Items 4, 5, 6, 7 and 8

I would make submissions on behalf of my clients that the issues here around the site selection processes; proposed construction scenarios and stages and durations; co-ordination between Morgan and Morecambe Projects; the proposed construction hours and mobilisation and the cumulative effects and inter-relationships between the Projects have not been properly assessed and taken into account in arriving at the proposals contained within the Draft DCO and that as a consequence, the effects on local business have not been properly assessed and that, furthermore, progress and discussions with interested parties in respect of the DCO and how matters can be addressed within the DCO to address specific landowner's and occupier's concerns have been painfully slow and have not allowed those affected to properly assess the impact of the Scheme and/or make relevant representations to the Examining Authority.

C. Compulsory Acquisition Hearing 1

2.15 Agenda Items 2, 3 & 5

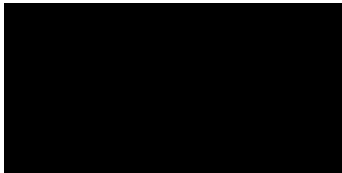
The applicant's approach here to the Draft DCO and their approach to negotiations with landowners and occupiers affected by the Scheme bears in my submission examination. I understand the need for the Scheme to pursue the Draft DCO and I also understand the Scheme's desire and quite rightly, to pursue by negotiation the acquisition rights sought under the Draft DCO by agreement with landowners and occupiers.

The Scheme have asserted to those affected that irrespective of the Draft DCO and/or its confirmation, their preference is to proceed by way of negotiated agreement for an option to take an easement.

The Scheme, through their agents have conducted those negotiations which are ongoing and although progress is being made in respect of the same, the outcome thereof is far from certain and has again created significant uncertainty for landowners and occupiers here as to how to respond to the Scheme and the Draft DCO. There is a good deal of scepticism as to whether or not the Scheme will eventually rely on any negotiated terms or the Draft DCO and that compounded with the uncertainty about how the Schemes will proceed – separately or in unison and over what timescales, has created a great deal of difficulty for those affected by the Scheme as to how proceed and the impact of the Scheme on their livelihoods, businesses and wellbeing. Again, negotiations within individual landowners are painfully slow and create the uncertainty scheduled above.

3. **Conclusions**

- 3.1 The above is a summary of the issues and concerns that my clients have in respect of the Scheme and I reserve their position to make further submissions in respect of the matters scheduled here in subsequent Specific and Compulsory Acquisition Hearings as to the detail behind those submissions here and the effect of this Scheme on my client's property.



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Andrew T Coney, P Wilson and Company LLP
Duly authorised Agent to: Mrs Christine Fare, Mr John Fare & Fare Farms Limited

11 April 2025