

**MORECAMBE AND MORGAN OFFSHORE WIND FARMS PROJECT****Reference Number: 20052880****Repretations in respect of Application for Development Consent Order on Behalf of Mr T J Kirkham,  
Mrs J E Worlock and Mrs J A Myerscough****Objections Lodged by P D Dennis FRICS, FAAV of [REDACTED],**  
[REDACTED]

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

1. Prior to submission of the Application by the Projects there was a lack of consultation on the Scheme to Landowners, Occupiers with no discussions regarding cable routes, drainage, land restoration, surface apparatus eg. jointing chambers and land uses. In particular no mention of the temporary mitigation area at Lytham and the requirement for the same was made until Heads of Terms were produced in November 2024.
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 prior to the close of the Statutory Consultation that the route had been decided and therefore all feedback could not have been considered.
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. If the Planning Inspectorate are minded to grant consent we request that they 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. Our Clients' wish to object to the routing shown and have put forward an alternative route lying to the north of Bridge Hall Farm at Saltcotes Road. We do not believe that alternative routes were adequately or properly considered. The reasoning given for rejection of this alternative route by the Project would appear to be due to an area of water retention on land in a wet time.

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5. We believe that whilst there is to be a Code of Construction Practice there is no absolute commitment that this will be complied with and strictly adhered to. Should the DCO be granted we request that the Planning Inspectorate impose a condition on the Developers requiring them to comply with the Code of Construction Practice.

6. 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 to anothers.

7. We understand that the bio-diversity and mitigation measures on the Temporary Mitigation land are not an absolute requirement for the Scheme but are voluntary measures suggested by the Promoters and we would respectfully suggest that it is not appropriate to grant the Promoters compulsory powers in respect of these in particular with respect to the Temporary Mitigation area at Lytham. We also note that it would appear that the suggested levels of net gain are excessive in that they are well above any level which would be required in a situation where bio-diversity net gain and mitigation works were required for the Scheme.

8. We note that there does not appear to be any information on the areas where disturbance is occurring which causes the preference/need for the Temporary Mitigation area.

9. We also note that the temporary mitigation areas appear to have been chosen due to their proximity to a similar mitigation area on land lying to the south west. We question whether mitigation in this area is likely to provide habitat for wildlife from areas other than those already immediately adjacent to it. The proposed location of the Lytham Temporary Mitigation Area may adversely affect the adjoining mitigation area by enticing birds from that area without increasing numbers. Any birds likely to move to this area will surely have already do so to the benefit of the adjoining mitigation area.

10. The proposed location of the Temporary Mitigation area will be closer to the flight path for the approach to Blackpool airport and will increase the risk of Bird strike for aeroplanes with the inherent safety issues.

11. We have questioned the Project of their requirement for multiple construction accesses off Ballam Road. We have also questioned them regarding the routing of those accesses

(a) why are two accesses required approximately 200m apart?

(b) why do these accesses appear in areas where there is currently no gate and then proceed diagonally across a field rather than following a field boundary.

This would appear to have been designed to cause maximum disruption to the Landowner and maximum disruption to local habitats as they will require substantial areas of hedge removal. Attached is a plan on which we have highlighted the location of existing gates at A, B and C. Gates at B and C are in the north western corners of fields with the northern boundary being a dyke or ditch. If the Scheme had

indeed proposed gateways at the points where existing gates are and then wished to cross diagonally over the fields they would have had to cross substantial ditches. It is far more sensible and preferable that any access routes follow field boundaries and minimise disruption.

We understand from meetings with the Project that major water courses will have a trenchless crossings but we are yet to be informed as to what constitutes a major water course or if indeed any of these water courses are regarded as major. We presume that the Scheme will have a facility to cross water courses during the construction phase and for this reason question why two construction accesses are required within such a short space. Our only conclusion for this can be that there is no facility to cross water courses on the construction working area and that all traffic will exit from the working area onto the public highway travelling 200m down the road before re-entering at the next available construction access. We would request that the Inspector interrogate the Project in great detail as to their rationale for requiring these accesses and certainly for requiring two in such a short space. It should be noted that we believe there is a construction compound within a few hundred metres to the north which should provide adequate access to the land by travelling along the working width rather than having construction traffic exit the site and re-enter a few hundred metres away vastly increasing heavy traffic on a public highway.

12. We believe that the construction access points on Saltcotes Road are unnecessarily situated away from the easement and working area. We believe this relocation creates a danger to road users. The easement/cable tracks will cross the Saltcotes Road at a high point where visibility is good in both directions however by moving the construction access points further to the south the benefit of this visibility especially to the north will be lost. When asked regarding the location of these construction access points the Project have indicated they believe that they coincide with gates which already exist however, this is not the case and relocation of these access points to the south will require further removal of hedges and destruction of local habitats. We request that the Inspector reject the DCO as it incorporates additional access points further to the south which have less visibility and removal of more habitats.

There are substantial additional area required adjacent to Saltcotes Road most particularly on the western side of Saltcotes Road. The Project have simply told us that these are sight lines but have given us no further information. We are unable to ascertain as to whether these sight lines will involve hedge line reduction or removal and believe that they would be overcome should the access points to the Projects be more beneficially situated as indicated in the item above.

13. We suggest that the Inspector visit the Ballam Road accesses and the Saltcoats road crossing on his accompanied viewing and we may wish to attend.

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

