

MORECAMBE AND MORGAN OFFSHORE WIND FARMS PROJECT**Reference Number: 20052923****Representations In Respect Of Temporary Mitigation Land at Lytham On Behalf Of Colin Bradley and Shirley Rayner-Porter.****Objections Lodged by P D Dennis FRICS, FAAV of** [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. There has been a lack of consultation between the Scheme and the Landowners/Occupiers with no discussions regarding the temporary mitigation area at Lytham until Heads of Terms were produced in November 2024. At the statutory consultation this area was shown as being adjoining one of two routes for the cable route but with no indication that if the northern cable route was decided upon that this would be promoted as a temporary mitigation area.
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. We presume that this also applied to temporary mitigation areas but these were not mentioned or indicated at the Statutory Consultation. We were notified prior to the close of the Statutory Consultation that the route has been decided and despite that there was still no indication given that this land may be required for a temporary mitigation area and therefore there has been no Statutory Consultation in respect of that.
3. 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.
4. 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.
5. We understand that the bio-diversity and mitigation measures 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

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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.

6. We note that there does not appear to be any information on the areas where disturbance is occurring which causes the requirement for temporary mitigation.

7. 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 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 accommodating displaced wildlife from areas affected by the project. Any birds likely to move to this area will surely have already done so due to the adjoining mitigation area

8. 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

9. Mr Bradley is a potato grower within the Fylde area having established the firm Fylde Fresh and Fabulous and in the event that the rights are granted we would request that the Inspector impose stringent conditions on the Scheme and their contractors to ensure that there is no contamination or waste/rubbish left on site as this can lead to rejection of contaminated crops and the future inability to grow potato crops for human consumption on this land. Waste such as hard plastics will also cause an issue as they are not picked up by destoners or metal detecting equipment on potato planting and harvesting machines and yet if they appear in the food chain can cause injury to the general public. It is essential therefore that the most stringent procedures are carried out and that the Promoters are required to give the Landowners a strict and extensive indemnity in respect of any liability which may occur from contamination or waste as a result of the exercise of rights.

10. We urge the Inspector to reject the application for compulsory powers for this Temporary Mitigation Area.

11. As at the date of writing these representations there are no viable Heads of Terms available for our clients' consideration to enter into an voluntary agreement.

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