

Submission ID: 36394

Important written representations on behalf of a landowner affected by two proposed substations and associated cable routes within their farm property

**WRITTEN REPRESENTATION FOR DEADLINE 1 – 20 MAY 2025**

**PLANNING INSPECTORATE REFERENCE NUMBER: EN020028**

**MADE ON BEHALF OF HORNBIES FOUNDATION CHARITY 503802**

**Interested Party Reference Number 20053119**

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## **INTRODUCTION**

SHP VALUERS Rural Practice Chartered Surveyors act on behalf of Hornbies Foundation Charity who own agricultural farms and land investments in the Fylde area and who's farm properties are directly impacted by the proposal for two substations, cable corridors, permanent and temporary access routes, other associated permanent ground level and below ground level apparatus, temporary working areas and other unforeseen matters associated with this DCO application.

The siting of both substation Projects A and B are located within Lower House and Marsh View Farm PR4 1TS which is a single farm holding until extending to circa 200 acres and includes two farmhouses and farm buildings which will be permanently severed.

## **SUMMARY**

We would ask the ExA to consider whether it is moral or indeed immoral to allow planning permission by DCO consent for not one but two separate developments of substations affecting one business property, construction of which could take place over the course of 11 years plus land restoration and recovery which could take a further four years or longer dependent upon the standard of reinstatement. The existing business will cease and the investment property will not be lettable.

We consider that the making of a DCO Order for two separate substations to be carried out by two separate developers acting completely independently and which could see construction happen concurrently, sequentially or separately to be immoral, potentially unlawful and an abuse of NSIP planning powers.

We contend that the Projects have not complied with the project principles of the siting of onshore transmission assets in making the DCO planning application.

The relevant document of reference is MORGAN AND MORECAMBE OFFSHORE WIND FARMS: TRANSMISSION ASSETS Environmental Statement Volume 1, Annex 4.3: Selection and Refinement of the Onshore Infrastructure

We summarise each sub paragraph below in which we make representations as an Affected Person within the main body of this Written Representation. The relevant sub paragraphs are as follows;

Environmental Statement Volume 1, Annex 4.3:

4.3.1.1 Guiding Principles for Onshore Infrastructure • Substations should be sited in proximity to each other .....Creation of Onshore Substations Search Zones4.5.4.5 To maintain an aligned approach for the route planning and site selection of the onshore infrastructure, the Applicants aimed to site the substations in proximity to each other. The alignment of the siting of onshore infrastructure, through the site selection process has been undertaken to reduce impacts, for example to landowners and local communities.

**These two proposed new substation sites are not aligned along the transmission route.**

- Avoid direct impact to residential properties – **There is direct impact farmhouses in close proximity as well as housing estate on Lower Lane, village of Newton with Scales.**

4.3.1.2 The principles embedded in the Horlock rules are relevant to the Transmission Assets and are detailed below in Table 4.3. -Local Context, Land Use and Site Planning **The substations are sited in Green Belt in an Area of Separation which is predominantly featureless open countryside offering no natural landscaping protection**

The land use effects of the proposal should be considered when planning the siting of substations or extensions. [Horlock Rules – Section III paragraph 6] – **The substation sites cause significant and permanent land use impact on commercial dairy farm and commercial dairy farm youngstock rearing businesses. The fact that there will be two substations to be located on one farm property is wholly unacceptable. It is not acceptable to move 300 milking cows across a single proposed crossing point to navigate proposed permanent SI Works 23B from Lower Lane to Morecambe Substation.**

Horlock Rules – Section III paragraph 7] – **Plan B and Plan C attached highlights that a design seeking to keep effects to a reasonably practicable minimum has been completely disregarded in our client's case.**

Space should be used effectively to limit the area required for development – **The combined substation area in an area of Green Belt close to residential properties extends to say 57 acres which is 167% greater area than Penwortham substation. Morgan substation has taken land unnecessarily beyond SI Works 21A up to Dow Brook for mitigation purposes.**

4.6.2.21 After the initial areas of environmental mitigation and/or biodiversity benefit were identified, the Applicants consulted the landowners to gauge whether they would be amenable to providing land - **The Projects have made no attempt to contact us to consult to gauge whether the landowner would be amenable to providing land for environmental mitigation**

## **WRITTEN REPRESENTATION**

We have extracted the relevant Applicant subsections and referenced these in arial italics type for ease of reference, together with our representations in arial bold type.

### *MORGAN AND MORECAMBE OFFSHORE WIND FARMS: TRANSMISSION ASSETS*

*Environmental Statement Volume 1, Annex 4.3: Selection and Refinement of the Onshore Infrastructure*

#### *4.3.1.1 Guiding Principles for Onshore Infrastructure*

- *Substations should be sited in proximity to each other – This principle should be considered alongside the location of any existing substations rather than two new substations in Green Belt. In any event these two proposed new substation sites are not aligned along the transmission route. The transmission cable routes are aligned in a west/east direction whilst the substation sites are aligned in a north/south alignment, The substation locations cause the cable routes to divert in a north/south split which causes more impact on the Green Belt environment and social community impacts.*

- *Avoid direct impact to residential properties – There is direct impact to Lower House farmhouse PR4 1TS, Marsh View Farmhouse PR4 1TS Greenbank Farmhouse PR4 1TS, Freshfield Farmhouse PR4 1TS, Marybank Farmhouse PR4 1TS as well as the close proximity to the village of Newton with Scales, as well as other private residential properties along Lower Lane and Kirkham Road and Dowbridge insofar as the Projects relate to the subject property Lower House and Marsh View Farm. The wider residential impacts are inappropriate.*

*Each step of the process as described in Table 4.2 and detailed for the onshore infrastructure in this report involved gathering desktop and survey data and feedback from stakeholders and the public to define and assess the Transmission Assets onshore infrastructure options. - There was categorically no landowner stakeholder consultation in respect of the Transmission Assets onshore infrastructure options until after the Transmission Assets onshore infrastructure options had been decided upon by the Projects.*

#### *4.3.1 Horlock Rules*

*4.3.1.2 The principles embedded in the Horlock rules are relevant to the Transmission Assets and are detailed below in Table 4.3.*

*-Local Context, Land Use and Site Planning*

*The siting of substations, extensions and associated proposals should take advantage of the screening provided by land form and existing features and the potential use of site layout and levels to keep intrusion into surrounding areas to a reasonably practicable minimum. [Horlock Rules – Section III paragraph 4] – The substations are sited in Green Belt in an Area of Separation which is predominantly featureless open countryside offering no natural landscaping to otherwise keep intrusion into surrounding areas to a minimum. The intrusion is of significant impact.*

*Screening around the onshore substations is detailed in Volume 3; Chapter 10: Landscape and Visual Resources of this E – The proposed landscape screening does not utilise any natural features and the proposed landscaping will take years to mature to any acceptable (as far as possible) level of visual screening.*

*The proposals should keep the visual, noise and other environmental effects to a reasonably practicable minimum. [Horlock Rules – Section III paragraph 5] – These Horlock Rules are not honoured*

*The land use effects of the proposal should be considered when planning the siting of substations or extensions. [Horlock Rules – Section III paragraph 6] – The substation sites cause significant and permanent land use impact on commercial dairy farm and commercial dairy farm youngstock rearing businesses. The fact that there will be two substations to be located on one farm property is wholly unacceptable. It is not acceptable to move 300 milking cows across a single proposed crossing point to navigate proposed permanent SI Works 23B from Lower Lane to Morecambe Substation.*

#### *Design*

*In the design of new substations or line entries, early consideration should be given to the options available for terminal towers, equipment, buildings and ancillary development appropriate to individual locations, seeking to keep effects to a reasonably practicable minimum. [Horlock Rules – Section III paragraph 7] – The Projects have not provided any design details for each substation footprint therefore it is impossible to confirm whether the effects are kept to a reasonably practicable minimum*

**We attach Plan A of Lower House Farm pre construction, Plan B during construction concurrent or sequentially overlapping, Plan C post construction/reinstatement. Plan B clearly highlights the complete devastation of the farm business which is unacceptable. It is clear to see the significant areas of severed unfarmable areas and field shapes which are small and awkward which are impractical to farm. Plan C clearly highlights the permanent losses to the Projects and also highlights the permanent severance of a main block of land to the north of the farmstead plus cable routes which are designed to cause maximum impact on the property. Horlock Rules – Section III paragraph 7 ...a design seeking to keep effects to a reasonably practicable minimum has been completely disregarded in our client's case.**

*Space should be used effectively to limit the area required for development consistent with appropriate mitigation measures and to minimise the adverse effects on existing land use and rights of way, whilst also having regard to future extension of the substation. [Horlock Rules – Section III paragraph 8] – The substation footprints are excessive particularly as each substation is merely required to convert 400kVa to 275kVa. Morgan substation footprint is approximately 40.5 acres (16.4 Ha) and*

Morecambe substation footprint is approximately 16.8 acres (6.8 Ha). These compared to the National Grid Penwortham substation site which is approximately 34 acres (13.76 Ha). The combined substation area in an area of Green Belt close to residential properties extends to say 57 acres which is 167% greater area than Penwortham substation.

**Table 4.6: Onshore Substations infrastructure parameters for site selection (PEIR) advises maximum site footprints of Morgan 12.5 Ha and Morecambe 6.0 Ha, however Morgan have taken land beyond SI Works 21A up to Dow Brook for mitigation purposes as acknowledged at Selection of Morgan OWL and Morecambe OWL Onshore Substations (Environmental Statement Volume 1, Annex 4.3: 4.5.5.19)**

**The existing green lane bridleway track which crosses the cable easement corridor to provide access to SI Works 49A south of Morgan substation is an important existing internal track as it links two farming businesses that work together (Lower House Farm and Greenbank Farm) therefore landowner requires to continue to have full use of this green lane.**

*4.6.2.21 After the initial areas of environmental mitigation and/or biodiversity benefit were identified, the Applicants consulted the landowners to gauge whether they would be amenable to providing land. The feedback received was used to inform and refine the areas of environmental mitigation and biodiversity benefit, which were subsequently presented as part of the statutory consultation at PEIR as shown in Figure 4.19.*

**The Projects have made no attempt to contact us to consult to gauge whether the landowner would be amenable to providing land for environmental mitigation. If the Projects had done so then we may have been amenable to this aspect. We would also comment that the locating of such areas has not come about with landowner consultation or support.**

*The design of access roads, perimeter fencing, earthshaping, planting and ancillary development should form an integral part of the site layout and design to fit in with the surroundings. [Horlock Rules – Section III paragraph 9]*

**The proposed design of access roads, perimeter fencing, earthshaping, planting and ancillary development do not fit in with the surroundings. The surroundings are permanent grassland with mature hedgerows with no woodland or wood coppices. The proposed permanent access haul roads within Green Belt land will be wider than Lower Lane.**

#### 4.5.3 Stage 2c: Identification of onshore substation search areas

4.5.3.2 To commence site selection an initial 5 km buffer, was drawn around the POI at the National Grid Substation at Penwortham. This radius was used to minimise the length of the 400 kV grid connection cables that would link the new substations to the POI, to minimise cable reactive power issues, to mitigate transmission losses, and to minimise adverse effects on economic efficiency.

4.5.3.3 Due to the presence of numerous constraints within 5 km...the buffer was increased to 8 km as illustrated on Figure 4.2.

**The proposed substation sites are approximately 7km from Penwortham substation which must affect the efficiency of the power transmission, particularly as previously proposed offshore booster platforms have been removed by the Projects due to environmental issues.**

*4.5.3.4 After establishing the initial area of search, a process of constraints mapping (Figure 4.2) and refinement was undertaken with due consideration to the overarching guidelines outlined within the Horlock Rules (see section 4.3.1) and to the design requirements set out in Table 4.3*

**The Horlock Rules have not been followed for the reasons stated above. However with no other options the Projects have considered that development in a Green Belt restriction area and cables routed through Flood Zone 3 areas and development of substations abutting Flood Zone 3 are satisfactory to meet the Horlock Rules ?**

**We contend that having assessed the various restrictions within the Projects extended 8km search radius that the Projects should have therefore declared the landfall at Lytham St Annes and route across the Fylde to be inappropriate under the Horlock Rules and also inappropriate for Project efficiency of transferring the offshore generated electricity.**

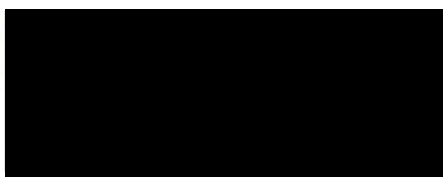
*Creation of Onshore Substations Search Zones*

*4.5.4.5 To maintain an aligned approach for the route planning and site selection of the onshore infrastructure, the Applicants aimed to site the substations in proximity to each other. The alignment of the siting of onshore infrastructure, through the site selection process has been undertaken to reduce impacts, for example to landowners and local communities.*

**As we state above the substations are not aligned along the transmission route. The transmission cable routes are aligned in a west/east direction whilst the substation sites are aligned in a north/south alignment, The substation locations cause the cable routes to divert in a north/south split which causes more impact on the Green Belt environment and social community impacts.**

**There is no cable route 'centreline' approach which has been adopted throughout the majority of other landowner affected land. Our client has been prejudiced against in siting two substations on their land together with cable routes which have not been adopted throughout the remainder of the Projects route.**

Signed



Date: 19 May 2025

Duly authorised agent on behalf of Hornbys Foundation Charity



**PLAN A**  
**LOWER HOUSE FARM**  
**NO SCHEME**

The map shows a large area outlined in red, labeled 'PLAN A LOWER HOUSE FARM NO SCHEME'. The area is situated between Preston New Road to the south and various residential areas to the north and west. Key features include:

- Surrounding Roads:** Preston New Road, Lay-by, Bridge, Footbridge, and various tracks.
- Local Landmarks and Buildings:** Freckleton Primary School, Marybank Farm, Marsh View Farm, Quaker's Wood, Sunnyhurst Farm, and various residential properties like The Nook, Barn Barn, and Greenbank View.
- Infrastructure:** A railway line (Ppg Sta) and several bridges (Footbridge, Bridge) are shown.
- Other Features:** A large area of land is marked with a cross-hatch pattern, and several smaller areas are marked with 'FB' (Footbridge).



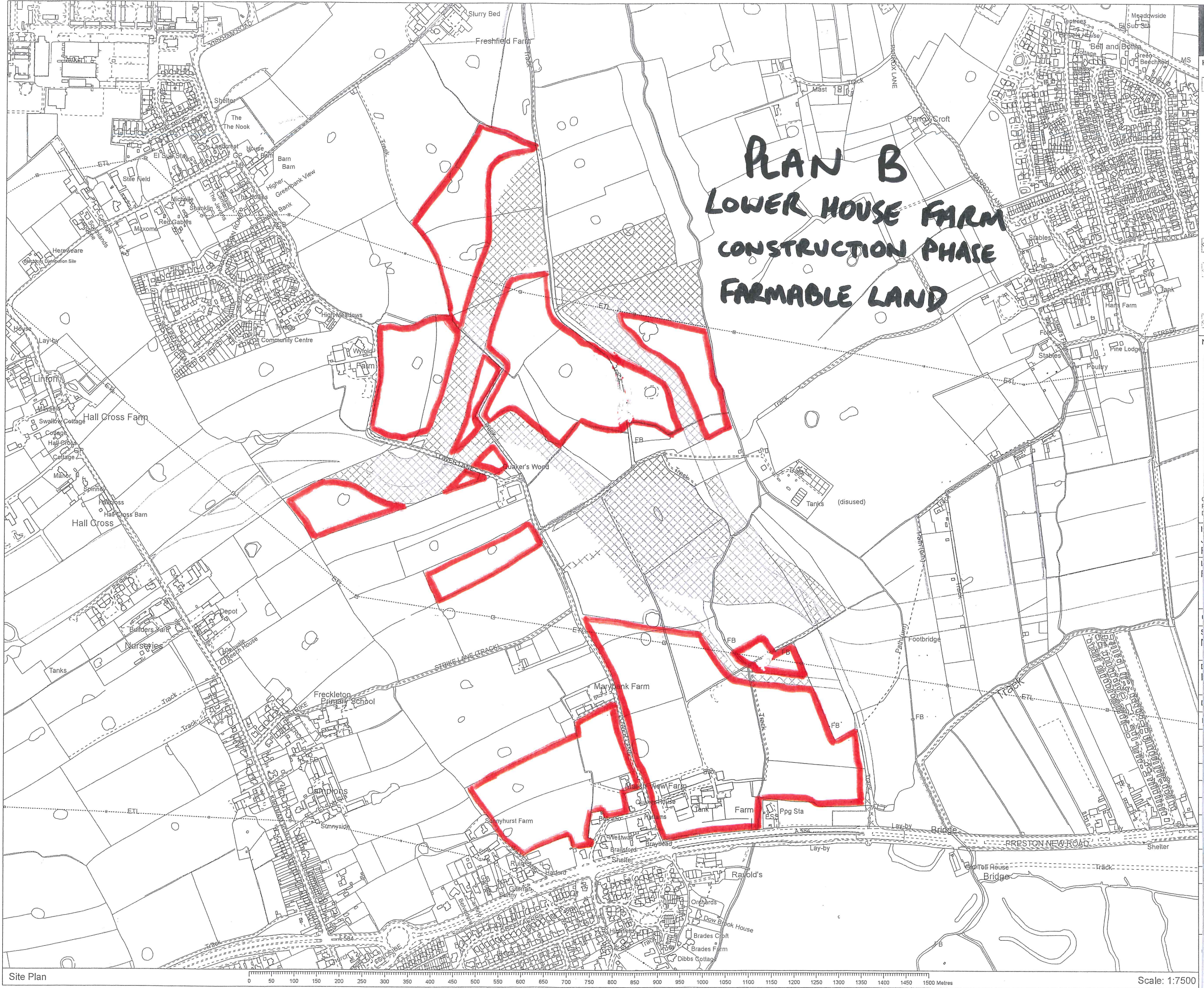
PLAN B

LOWER HOUSE FARM

CONSTRUCTION PHASE

FARMABLE LAND

DARROCK LANE





A hand-drawn map of Lower House Farm. The map shows various buildings, including a large house at the top left and several smaller structures. A road, labeled 'Parson Croft' and 'HILL LANE', runs along the right side. A dashed line indicates a proposed road or path. The text 'PLAN C' is written in large, bold, black letters at the top. Below it, 'LOWER HOUSE FARM' is written in large, bold, black letters. At the bottom, 'POST CONSTRUCTION' and 'FARMABLE LAND' are written in large, bold, black letters. The map is drawn with simple lines and includes some small circles and dots representing trees or other features.

