

Please find attached an important written representation on behalf of an affected landowner and farming business located immediately adjoining the proposed Morgan Substation site. The farmhouse and farmhouse annexe are occupied by a working family including a husband and wife with young daughter and the wife's father.

WRITTEN REPRESENTATION FOR DEADLINE 1 – 20 MAY 2025

PLANNING INSPECTORATE REFERENCE NUMBER: EN020028

MADE ON BEHALF OF D LUND AND M FARE FARMING PARTNERSHIP

Interested Party Reference Number 20053939

CONTENTS

Page 1. Introduction

Page 2. Summary

Page 4. Written Representation

INTRODUCTION

SHP VALUERS Rural Practice Chartered Surveyors act on behalf of Deryck Lund and Michelle Fare of Greenbank Farm, Lower Lane, Freckleton PR4 1TS, who own the property freehold and are owner occupiers of a farming business which is a contract rearing of dairy replacement heifers and grass silage production business that also includes other rented land also situated at Lower Lane, Freckleton.

Greenbank Farm is 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.

It is our contention that the project principles of the siting of onshore transmission assets has not been adhered to when considering the siting of the substations. The predominant supporting document made by the Applicants is the Environmental Statement Volume 1, Annex 4.3: Selection and Refinement of the Onshore Infrastructure. We make reference to and comment on aspects of this document for our Written Representation.

SUMMARY (written representation exceeds 1500 words)

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. This principle relates to any existing onshore substations not two new substations in Green Belt. In any event the two new substations are not aligned along the route.

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 two new substations are not aligned along the route.

4.3.1.2 The principles embedded in the Horlock rules. Horlock Rules have not been complied with in our opinion. Substations sited in Green Belt in an Area of Separation which is predominantly featureless open countryside offering no natural landscaping. Cable routes through significant Flood Zone 3 areas.

Design - 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. The Projects propose permanent access rights to access biodiversity mitigation areas over the private farm access road serving Greenbank Farm and Freshfield Farm identified as SI Works 34A40A41A. This proposed permanent access is wholly unnecessary, shown coloured in red on the attached identification plan. We have proposed a much more suitable access shown coloured in green on the attached identification plan.

The two new substations together extend to say 57 acres which is 167% greater area than Penwortham substation which is approximately 34 acres. The space required for the proposed substations has not been used effectively and create significant adverse effects on existing land use and rights of way.

4.5.3.3 Due to the presence of numerous constraints within 5 km...the buffer was increased to 8 km

Substation sites are approximately 7km from Penwortham substation which must affect the efficiency of the power transmission. The substation locations are energy inefficient.

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 they would be amenable to providing land for environmental mitigation. Proposed SI Works 49A should be relocated to an approximate location shown edged in purple on the attached identification plan which includes an existing pond/pit not previously identified on surveys.

Other Material Matters

Temporary Works - SI Works 22A which is proposed to be located on the west side of the proposed permanent haul road and whilst this is temporary area we consider this unnecessary for the construction of either the haul road or the substation. shown edged in blue on the attached identification plan.

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 Greenbank Farm PR4 1TS, Freshfield Farm PR4 1TS, Lower House Farm PR4 1TS, Marsh View Farmhouse PR4 1TS, Marybank Farm 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 Greenbank 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 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.

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

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 for Application 4.5.5.19

The Projects propose permanent access rights to access biodiversity mitigation areas over the private farm access road serving Greenbank Farm and Freshfield Farm identified as SI Works 34A40A41A. This proposed permanent access is wholly unnecessary as the Morgan Project will have permanent access from the A583. SI Works 34A40A41A impacts residential amenity and business security as the proposed vehicular access passes through residential properties off Lower Lane two residential farm properties and private farm yards.

SI Works 34A states –permanent access including— (a) creation and improvement of access to highway; and (b) works to visibility splays. What is meant by ‘creation’ as the private road exists and what is meant by ‘improvement’.

The existing green lane bridleway track which crosses the cable easement corridor to provide access to SI Works 49A south of Morgan substation is important 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.

This proposed permanent access is wholly unnecessary, shown coloured in red on the attached identification plan. We have proposed a much more suitable access shown coloured in green on the attached identification plan.

This biodiversity mitigation access route is to proposed mitigation area SI Works 49A which is in a wholly inappropriate location abutting Freshfield Farmhouse and causes loss of amenity countryside views to the south from Greenbank Farmhouse. There is no description of what this area is mitigating and there has been no prior discussion with the landowner at Greenbank Farm or Freshfield Farm for this proposed siting. It would appear that SI Works 49A is a biodiversity enhancement which is not a requirement for Project A as BNG is not a legal requirement. If the Projects had liaised with the landowner then there would have been a likelihood of jointly agreeing suitable location(s) for permanent environment mitigation works however this was not discussed/considered by the Projects until it was too late to amend the submitted plans. Proposed SI Works 49A should be relocated to an approximate location shown edged in purple on the attached identification plan which includes an existing pond/pit not previously identified on surveys.

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 they 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.

SI Works 49A abutting Freshfield Farm was not known to us until it had been included in the DCO application SI Works. We made our enquiry dated 21 November 2024 to find out more about this mitigation proposal and the response from Dalcour MacLaren (DM) was that whilst this was not something their liaison officer was aware of he explained in an email that having looked it up it is to be a pond to mitigate loss of a pond.

At a site meeting with DM and Jacqui Stoddart Morgan representative on 5 February 2025 this pond mitigation was discussed and a potentially suitable alternative was found on site which had not been previously identified as a pond, however whilst this alternative appeared to be a suitable pond mitigation location yet again the Project advised that it was too late to revise the submitted plans. We request that proposed SI Works 49A abutting Freshfield Farm is relocated to the identified suitable location. shown edged in purple on the attached identification plan which includes an existing pond/pit not previously identified on surveys.

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 and the private farm track.

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 declared the landfall at Lytham St Annes and route across the Fylde to be inappropriate under the Horlock Rules and 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.

Other Material Planning Matters

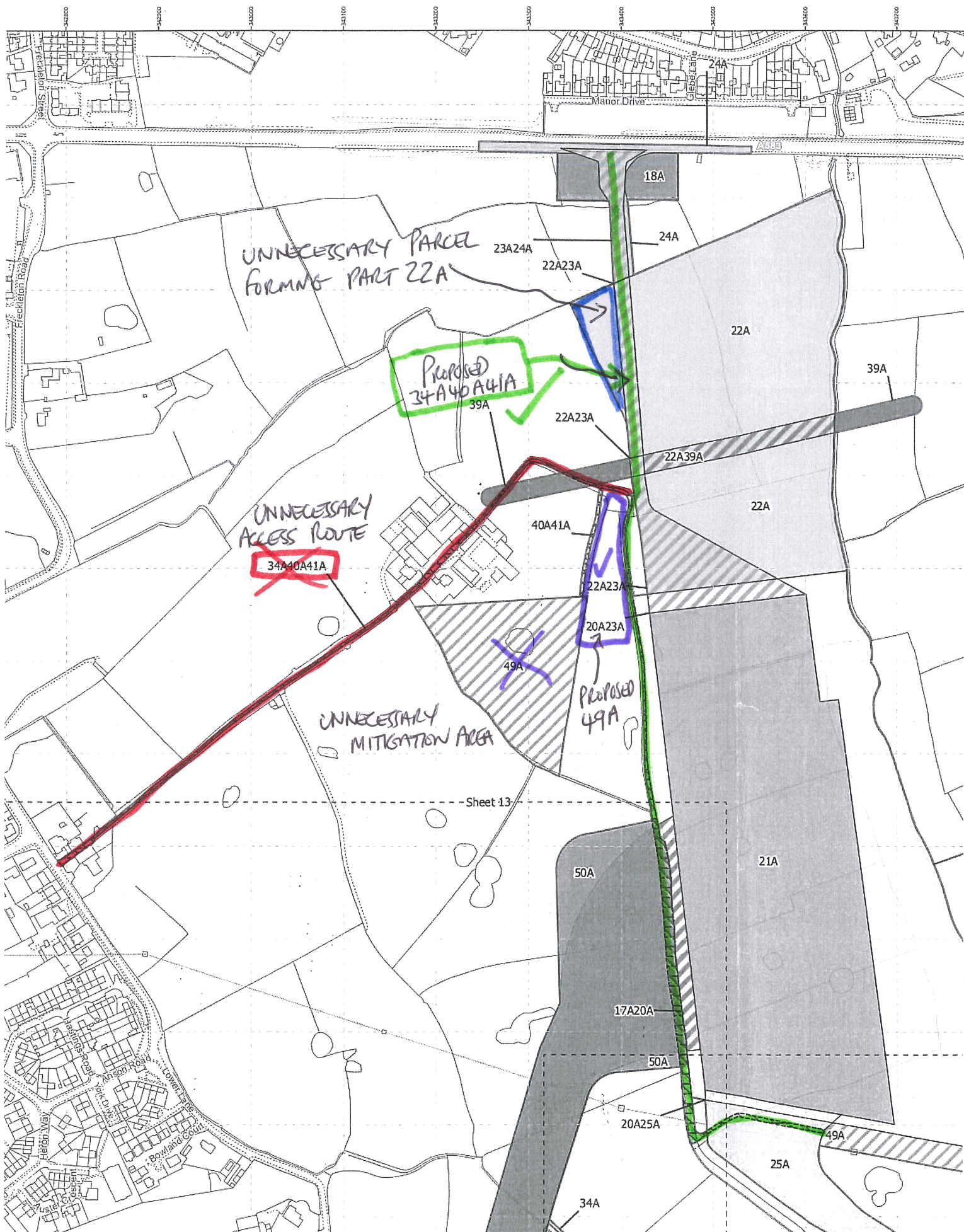
There is a small triangular section of temporary works SI Works 22A which is proposed to be located on the west side of the proposed permanent haul road and whilst this is temporary area we consider this unnecessary for the construction of either the haul road or the substation. Project A has verbally agreed that this triangle area appears unnecessary however the Project would not remove this temporary area simply due to the fact that the planning application had been submitted. We request that this temporary area is removed from the planning application as unnecessary particularly given the large temporary compound to the east of the proposed permanent haul road. There is no need to disturb any additional land on the west side of the haul road as we consider this unnecessary for the construction of either the haul road or the substation. shown edged in blue on the attached identification plan.

Signe



Date: 19 May 2025

Duly authorised agent on behalf of D Lund and M Fare Farming Partnership



Drawing Title:
Works Plan - Sheet 14 of 21
AFPF Regulation: 5(2)(k)
Document Reference: B7

0 25 50 75 Meters
Scale@A1: 1:2,500

Geodetic Information:
Datum: OSGB 1936
Projection: British National Grid

Data Sources: BP, Ordnance Survey
Based Upon The Ordnance Survey Map With The Sanction
Controller Of HM Stationary Office. Crown Copyright Reserv
Licence No. 100042124

PLAN REFERRED TO
NOT TO SCALE