

MORGAN AND MORECAMBE OFFSHORE WIND FARMS: TRANSMISSION ASSETS

Applicants' Response to Written Representations from People with interest in Land (PWILS)

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Glossary

Term	Meaning
Applicants	Morgan Offshore Wind Limited (Morgan OWL) and Morecambe Offshore Windfarm Ltd (Morecambe OWL).
Candidate Special Areas of Conservation	Areas that were submitted to the European Commission as candidates for designation as a Special Area of Conservation before the end of the Transition Period following the UK's exit from the EU, but not yet formally designated. See also Special Areas of Conservation.
Development Consent Order	An order made under the Planning Act 2008, as amended, granting development consent.
Environmental Impact Assessment	The process of identifying and assessing the significant effects likely to arise from a project. This requires consideration of the likely changes to the environment, where these arise as a consequence of a project, through comparison with the existing and projected future baseline conditions.
Environmental Statement	The document presenting the results of the Environmental Impact Assessment process.
European Protected Species	Species (such as bats, great crested newts, otters and dormice) which receive full protection under The Conservation of Species and Habitats Regulations 2017 and Conservation of Offshore Marine Habitats and Species Regulations 2017.
Generation Assets	The generation assets associated with the Morgan Offshore Wind Project and the Morecambe Offshore Windfarm include the offshore wind turbines, inter-array cables, offshore substation platforms and platform link (interconnector) cables to connect offshore substations.
Greenhouse gas	A gas that absorbs and emits radiant energy within the thermal infrared range, causing the greenhouse effect. Examples include carbon dioxide and methane.
Habitats Regulations	The Conservation of Habitats and Species Regulations 2017 (as amended) and the Conservation of Offshore Marine Habitats and Species Regulations 2017 (as amended).
Kyoto Protocol	The Kyoto Protocol is an international agreement linked to the United Nations Framework Convention on Climate Change, which commits its parties to reducing greenhouse gas emissions by setting internationally binding emission reduction targets, implemented primarily through national measures but also via wider market-based mechanism.
Landfall	The area in which the offshore export cables make landfall (come on shore) and the transitional area between the offshore cabling and the onshore cabling. This term applies to the entire landfall area at Lytham St. Annes between Mean Low Water Springs and the transition joint bay inclusive of all construction works, including the offshore and onshore cable routes, intertidal working area and landfall compound(s).
Local Planning Authority	The local government body (e.g., Borough Council, District Council, etc.) responsible for determining planning applications within a specific area.

Term	Meaning
Marine licence	The Marine and Coastal Access Act 2009 requires a marine licence to be obtained for licensable marine activities. Section 149A of the Planning Act 2008 allows an applicant for to apply for 'deemed marine licences' in English waters as part of the development consent process.
Morecambe OWL	Morecambe Offshore Windfarm Ltd is a joint venture between Cobra Instalaciones y Servicios, S.A. (Cobra) and Flotation Energy Ltd.
Morgan and Morecambe Offshore Wind Farms: Transmission Assets	<p>The offshore export cables, landfall and onshore infrastructure for the Morgan Offshore Wind Project and the Morecambe Offshore Windfarm. This includes the offshore export cables, landfall site, onshore export cables, onshore substations, 400 kV grid connection cables and associated grid connection infrastructure such as circuit breaker compounds.</p> <p>Also referred to in this report as the Transmission Assets, for ease of reading.</p>
Morgan OWL	Morgan Offshore Wind Limited is a joint venture between bp Alternative Energy investments Ltd. and Energie Baden-Württemberg AG (EnBW).
National Policy Statement(s)	The current national policy statements published by the Department for Energy Security and Net Zero in 2023.
Planning Inspectorate	The agency responsible for operating the planning process for applications for development consent under the Planning Act 2008.
Protected species	A species of animal or plant which it is forbidden by law to harm or destroy.
Ramsar sites	Wetlands of international importance that have been designated under the criteria of the Ramsar Convention. In combination with Special Protection Areas and Special Areas of Conservation, these sites contribute to the national site network.
Renewable energy	Energy from a source that is not depleted when used, such as wind or solar power.
Special Areas of Conservation	A site designation specified in the Conservation of Habitats and Species Regulations 2017. Each site is designated for one or more of the habitats and species listed in the Regulations. The legislation requires a management plan to be prepared and implemented for each SAC to ensure the favourable conservation status of the habitats or species for which it was designated. In combination with Special Protection Areas and Ramsar sites, these sites contribute to the national site network.
Special Protection Areas	A site designation specified in the Conservation of Habitats and Species Regulations 2017, classified for rare and vulnerable birds, and for regularly occurring migratory species. Special Protection Areas contribute to the national site network.
The Secretary of State for Energy Security and Net Zero	The decision maker with regards to the application for development consent for the Transmission Assets.
Transmission Assets	See Morgan and Morecambe Offshore Wind Farms: Transmission Assets (above).

1 Applicants' response to Written Representations

1.1 Introduction

1.1.1.1 Following Deadline 1, Morgan Offshore Wind Limited and Morecambe Offshore Windfarm Limited (hereafter, 'the Applicants') have reviewed each of the Written Representations (WRs) and post hearing submissions received from stakeholders who registered as Interested Parties in the Examination.

1.1.1.2 This document outlines the Applicants' response to following WR:

Grouping	Written Representation References
Laycock family	REP1-106 Angela Laycock REP1-208 Timothy Owen Laycock REP1-212 Timothy Owen Laycock
Mason Family	REP1-109- Anne Mason REP1-144 - George Rigby Mason and Alice Maragaret Mason REP1-219 - GR&B Mason & Son
Bradley and Raynor - Porter	REP1-123 - Colin Bradley REP1-124 - Colin Bradley and Shirley Rayner-Porter
Fare and Lund	REP1-125 - D Lund and M Fare Farming Partnership REP1-173 - Michelle Ruth Fare
Ellis Family	REP1-174 - Midgeland Riding School and Livery REP1-178 - Mr Paul Hamilton Ellis and Paul Hamilton Ellis as current sole owner of land previously owned by himself and Patrick Frank Ellis
Sheila Hall	REP1-200 - Sheila Hall REP1-201 - Sheila Hall
Kirkham family	REP1-156 - J W Kirkham & Sons Ltd REP1-157- J W Kirkham & Sons Ltd REP1-177 - Mr H and Mrs J Kirkham REP1-179 - Mr T J Kirkham, Mrs J E Worlock and Mrs J A Myerscough

2 Responses to Written Representations

2.1 Fylde Council

Table 2.1: REP1-081 – Fylde Council

Reference	Written Representation Comment	Applicants' response
REP1-081 081.1	The following Relevant Representation (revised May 2025) is made by Fylde Borough Council, in its capacity as a Landowner for the proposed development consent order application made by Morgan Offshore Wind Limited ("Morgan OWL") and Morecambe Offshore Windfarm Ltd ("Morecambe OWL"), (together, the "Applicants"). The Relevant Representation is submitted in response to the Rule 8 Letter Examination Timetable, Procedure, Notification of Hearing and Accompanied Site Inspection received by Fylde Council as an 'interested party' on Thursday May 8th, 2025, regarding the 'Application by Morgan Offshore Wind Limited and Morecambe Offshore Windfarm Limited for an Order Granting Development Consent for the Morgan and Morecambe Offshore Wind Farms Transmission Assets.' The applicants seek the grant of a development consent to construct, operate and maintain, and decommission two electrically separate transmission systems (the "Transmission Assets"), which are proposed to connect to the Morgan and the Morecambe Offshore Wind Project: Generation Assets ("Application").	The representation is noted.
REP1-081 081.2	The representation includes the initial comments submitted prior to the examination in public with the addition of material information on matters that relate to the content and scope of the application, in respect of the Council's interests as landowner of several holdings within and	The Applicants note the response and understand that Fylde Council have an interest in the following areas and plots as per the Land Plans (REP1-004) and Book of Reference (REP1-014).

Reference	Written Representation Comment	Applicants' response
	<p>adjoining the application DCO redline area (current & future uses). Potential impacts identified in this representation remain an indication only by the Council at this initial stage, detailed comments will be provided through the Council's oral and written involvement in the Examination. Landholdings held by Fylde Council within or adjoining the Application are listed below, with detail to be provided at the earliest opportunity in the examination process:</p> <p>a) Lytham St Annes Beach (area fronting the Persimmons housing development)</p> <p>b) Blackpool Road Playing fields and surrounding facilities (changing area, skate park etc)</p> <p>c) North Beach Car Park – Clifton Drive</p> <p>d) Former weigh station facility for Fox Brothers sand extraction (Clifton Drive)</p> <p>e) Land 'in and around' Fairhaven Lake / saltmarsh (for mitigation measures)</p>	<p>a) Lytham St Annes Beach (area fronting the Persimmon housing development) 01-005, 01-009, 01-013, 01-018, Fylde Council have a freehold interest in these plots.</p> <p>b) Blackpool Road Playing fields and surrounding facilities (changing area, skate park etc) 04-013, 04-014, 04-015, 14-016, 04-017, 04-018. The Applicants understand the land is under the ownership of Lytham Town Trust Limited with a long term leasehold held by Fylde Council.</p> <p>c) North Beach Car Park – Clifton Drive 01-019, 01-020, 01-020 Fylde Council have a freehold interest in these plots.</p> <p>d) Former weigh station facility for Fox Brothers sand extraction (Clifton Drive) 01-010, Fylde Council have a freehold interest in this plot.</p> <p>e) Land 'in and around' Fairhaven Lake / saltmarsh (for mitigation measures) 19-001 and 19-002. Fylde Council have a freehold interest in these plots.</p>
REP1-081 081.3	<p>The Council has concerns over the current drafting of the application, including.</p> <p>a) A lack of detail and clarity in the current application and supporting documents, in particular the EIA, CTMP and TMP (although some will be LCC matters)</p> <p>b) Lack of information on whether land is required for both Morecambe and Morgan or whether there are different requirements for each applicant.</p> <p>c) No detail about biodiversity offset mitigation works 'in and around' Fairhaven Lake / saltmarsh making it impossible to formulate any feedback or comment.</p>	<p>a) The Applicants believe that the Environmental Statement and supporting management plans are robust and appropriate and include sufficient detail and clarity. Specific details regarding the Transmission Assets are contained within Volume 1, Chapter 3: Project Description (AS-024). Each impact assessment topic outlines the Maximum Design Scenario for the purposes of impact assessment within its relevant chapter (see Applicants' response to ISH1_22 in REP1-037). This approach identifies the specific details relevant to that particular topic through the construction, operation and decommissioning phases of the Transmission Assets. The Applicants are confident that this approach underpins the robustness of the conclusions drawn within each impact assessment topic. With regard to traffic the Applicants have prepared an Outline Construction Traffic Management Plan (OCTMP) (APP-211). The requirement to produce the detailed CTMP(s) in accordance with the OCTMP in consultation with, and for approval by, the relevant</p>

Reference	Written Representation Comment	Applicants' response												
	<p>d) The extent of rights and land sought over land within the Council's ownership or control.</p> <p>e) The potential impact of the proposals on the quality of Fylde controlled Bathing Waters.</p> <p>f) The potential impact of proposals on access or trade at the Beachcomber Cafe and Wind Sports Centre located adjacent to North Beach Car Park.</p> <p>g) The potential impact of proposals on access by the coastguard to facilities located on North Beach Car Park.</p> <p>h) The potential impact on residents regarding access and use of Blackpool Road Playing Fields for an undetermined period.</p> <p>i) The potential impact on the 46 teams that use the Blackpool Road Playing Fields.</p>	<p>highway authority, is secured by Schedules 2A and 2B of Requirement 9 of the draft DCO (REP1-008).</p> <p>b) The requirement for the land and rights sought are set out within the Book of Reference (REP1-014) All the plots set out above in REP1-081.2 are required for the construction, including mitigation, of the transmission assets for both Morgan and Morecambe. The Works Plans (AS-014 and AS-015), with the detail of the specific works on each plot are set out in Schedule 1 Part 1 the draft Development Consent Order (REP1-008) which is summarised in the table below. The Book of Reference (REP1-014) clearly shows the breakdown of rights required for each of Morecambe OWL and Morgan OWL in respect of their respective construction and operation works.</p> <table> <tr> <th>Area</th><th>Plots</th><th>Work Number and Description</th></tr> <tr> <td>Lytham St Annes Beach</td><td>01-005, 01-009, 01-013, 01-018</td><td>6A6B Shared offshore cable works under Lytham St Annes Dunes SSSI</td></tr> <tr> <td>Blackpool Road Playing fields</td><td>04-013, 04-014, 04-015, 14-016, 04-017, 04-018.</td><td>52A51B, 51A52B, 15A15B, 53A53B, 54A54B Shared Onshore Cable Corridor at Leech Lane, Shared Onshore Cable Corridor at Blackpool Airport Recreation Ground</td></tr> <tr> <td>North Beach Car Park</td><td>01-019, 01-020, 01-020</td><td>38A, 19A Pedestrian Only Construction Access between 5A5B and 38A38B, Shared Construction Compounds, Shared Construction Access</td></tr> </table>	Area	Plots	Work Number and Description	Lytham St Annes Beach	01-005, 01-009, 01-013, 01-018	6A6B Shared offshore cable works under Lytham St Annes Dunes SSSI	Blackpool Road Playing fields	04-013, 04-014, 04-015, 14-016, 04-017, 04-018.	52A51B, 51A52B, 15A15B, 53A53B, 54A54B Shared Onshore Cable Corridor at Leech Lane, Shared Onshore Cable Corridor at Blackpool Airport Recreation Ground	North Beach Car Park	01-019, 01-020, 01-020	38A, 19A Pedestrian Only Construction Access between 5A5B and 38A38B, Shared Construction Compounds, Shared Construction Access
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Blackpool Road Playing fields	04-013, 04-014, 04-015, 14-016, 04-017, 04-018.	52A51B, 51A52B, 15A15B, 53A53B, 54A54B Shared Onshore Cable Corridor at Leech Lane, Shared Onshore Cable Corridor at Blackpool Airport Recreation Ground												
North Beach Car Park	01-019, 01-020, 01-020	38A, 19A Pedestrian Only Construction Access between 5A5B and 38A38B, Shared Construction Compounds, Shared Construction Access												

Reference	Written Representation Comment	Applicants' response			
		Former weigh station facility for Fox Brothers	01-010	6A6B 18A18B Onshore cable works under Lytham St Annes Dunes SSSI, Shared construction compound	
		Land 'in and around' Fairhaven Lake / saltmarsh	19-001 and 19-002	49A49B Shared Environmental Mitigation and Enhancement	
		<p>c) Paragraph 1.8.3.3 of the Outline Ecological Management Plan (APP-212), which is secured under Requirement 12 of Schedules 2A & 2B of the draft DCO (REP1-008) states that mitigation measures will be provided at Fairhaven saltmarsh to reduce disturbance to roosting wader features of Ribble and Alt Estuary SPA. This may comprise a combination of the employment of a warden, educational signage, and soft fencing.</p> <p>The detailed Ecological Management Plan(s), will be prepared in accordance with the Outline Ecological Management Plan (APP-212) and will be subject to approval by the relevant planning authority in consultation with Natural England, as is required by Requirement 12 of Schedules 2A & 2B of the draft DCO (REP1-008). All relevant works would subsequently be undertaken in accordance with this approved plan, which ensures that any work carried out under these plan(s) would have been reviewed by the relevant planning authority, and as needed, Natural England.</p> <p>d) The Applicants have undertaken extensive due diligence regarding the ownership and interests identified along the order limits as set out within the Consultation Report (APP-170) including data refreshes of His Majesty's Land Registry (HMLR) data. The Applicants have included Fylde Council within the Book of Reference (REP1-014) where the Applicants understand Fylde Council to have an interest. The Applicants are in ongoing discussions with Fylde Council regarding the heads of terms for the land rights sought where an interest is land is held, through these discussions, if changes to ownership are identified, the Book of Reference will be updated accordingly. Updates on</p>			

Reference	Written Representation Comment	Applicants' response
		<p>the discussions with Fylde Council regarding land rights will be reported on within the Land Rights Tracker (REP1-065) at the deadlines set out in the Rule 8 letter (PD-007)</p> <p>e) Volume 2, Annex 2.2: Water Framework Directive (WFD) coastal waters assessment (APP-047) provides an assessment on the potential impacts to bathing waters. The assessment concludes that the construction, operation and maintenance, and decommissioning of the Transmission Assets offshore export cables is not predicted to cause a deterioration in the status of the Mersey Mouth or Ribble waterbodies with respect to WFD protected areas. It is therefore considered, in this respect, to be compliant with the requirements of the WFD. However, good practice measures and controls will be implemented as detailed within the outline Code of Construction Practice to ensure any potential impacts from the development are controlled.</p> <p>f) A socio-economic assessment was carried out for the project which concluded a minor beneficial effect on economic receptors as a result of the Transmission Assets. Whilst this does not include assessments and impacts on individual businesses it is clear that the project as a whole will have economic benefit to the area.</p> <p>There is no statutory guidance available that recommends assessment of impacts on individual businesses in any sector. EIA analysis at the level of individual businesses would likely mean that all conclusions on effects, whether beneficial or adverse, would be significant on all projects because of the effects to some particularly sensitive individual business. This would be contrary to supporting decision-makers in identifying the material issues, meaning the assessment of EIA significance at the level of individual businesses is not proportionate. This principle aligns with advice set out by the Institute of Environmental Management and Assessment (IEMA) on the interrelated topic of human health and assessing effects on individuals.</p> <p>Where individual businesses are concerned about the potential impact as a result of the Project, they are welcome to contact us (details regarding how to get in touch can be found here: Contact us - Morecambe Offshore Windfarm Limited and Morgan Offshore Wind Limited).</p> <p>g) The temporary construction compound at North Beach Car Park is shown on the Work Plans – Onshore and Offshore Part 1 of 2 (AS-014) as part of Work Nos. 38A38B (see section 3.14 in Volume 1, Chapter 3: Project Description (AS-024) and section 4 in REP1-040). This temporary construction compound is for parking and a welfare unit and therefore there will be no anticipated impact to the coastguard in terms of access to their</p>

Reference	Written Representation Comment	Applicants' response
		<p>facilities because the Applicants will only utilise parking bays as they are in the current layout</p> <p>h) The Applicants refer Fylde Borough Council to the Applicants' response to hearing Action Point: ISH 18 Blackpool Road Recreation Ground Summary of impacts (REP1-041).</p> <p>i) The Applicants have committed that where mitigation is required for construction activities at Blackpool Road Recreation Ground (for example, the relocation or provision of alternate amenities) these measures will be secured via separate agreements with the relevant parties. For example, via section 106 agreements under the Town and Country Planning Act 1990 and/or section 111 agreements under the Local Government Act 1972 via the following commitment, CoT20 (see Volume 1, Annex 5.3: Commitments Register (AS-030).</p> <p>The Applicants are continuing to proactively engage with Fylde Borough Council and St Annes Football Club to further develop the mitigation options.</p>
REP1-081 081.4	<p>Proposed Heads of Terms circulated on April 25th, 2025, do not address the lack of detail or justification for the flexibility requested by the applicants in respect of the proposed cable routes, construction and operational methodology. The Heads of Terms do not reflect the nature and type of land listed above that is in the ownership of Fylde Council. The lack of detail about the extent and necessity of the proposed temporary rights, and the permanent rights to be acquired has not been addressed. It is not possible for the council to fully assess disturbance to current and future users located on Council owned land, including through temporary interference and permanent sterilisation of land use for example, the impact of the application on bathing water quality, beach access, water sports, the beach café, adjacent residents, and the use of leisure facilities / sports pitches is unclear and cannot properly be assessed. There is uncertainty in the application regarding the extent of land reserved for</p>	<p>The Works Plans (AS-014 and AS-015) and Schedule 1, Part 1 of the Draft Development Consent Order (REP1-008) include the detail of the proposed works within each area along the Order Limits.</p> <p>a, b and c)The Applicants issued updated Heads of Term to Fylde Council on 20th May 2025. The Applicants also met with Fylde Council on 4th June 2025 to discuss the rights sought and works to take place on the land owners by and where Fylde Council have an interest. The Book of Reference (REP1-014) sets out the rights required for Morgan and Morecambewhich corresponds with the Land Plans (REP1-004). The Applicants have been in discussion over the Heads of Terms for the land rights sought and will continue to work on these to ensure Fylde Council have clarity on what is required for the Transmission Assets.</p> <p>The Land Plans (REP1-004) show the land required for temporary possession in Yellow and where permanent rights are required in Blue. The Book of Reference (REP1-014) clearly shows the breakdown of rights required for each of Morecambe OWL and Morgan OWL in respect of their respective construction and operation works.</p> <p>The Applicants may be required to restrict access to land during construction, however it is the intention that following completion of the construction works, all the land owned</p>

Reference	Written Representation Comment	Applicants' response
	<p>temporary construction, permanent wayleaves, restricted or no access to land, and leases of construction compounds and jointing bays. This uncertainty inhibits the Council's ability to plan for:</p> <p>a) Intended future projects, such as new car parking and changing facilities at Blackpool Road Playing Fields</p> <p>b) Setting aside council funding/budget for projects i.e. the soft sea defence on the dunes, conservation project work, development of beach assets planned in the Beach Management Strategy</p> <p>c) The provision of statutory signage to advise against bathing if the bathing water classification is poor or in the event that a short-term Pollution Risk Forecast is issued by the Environment Agency</p> <p>d) Loss of income, use, and access at North Beach Car Park and other locations</p> <p>e) The continued provision and access to sports pitches and leisure amenities at Blackpool Road Playing Fields</p> <p>f) The requirement for mitigation measures on the dunes and at Blackpool Road Playing Fields.</p>	<p>and occupied by Fylde Council will be reinstated and continued to be used as per its existing use.</p> <p>Regarding future plans mentioned, the Applicants welcome engagement on the Council's plans to better understand the interaction of these plans with the Transmission Assets proposals.</p> <p>d) The Applicants note the concerns raised regarding North Beach Car Park. However, the temporary compound located within the North Beach Car Park (Work no. 38A/38B) will temporarily remove 22 standard parking bays from public use. However, of the total 126 standard parking bays located at the North Beach Car Park, 104 standard bays will remain open and available to the public for the duration of the works (see section 4 in REP1-040).</p> <p>Any loss of income as a direct result of the project will be discussed with the Council as part of the land agreement in accordance with the compensation code and associated guidance.</p> <p>e and f) In addition, the Applicants have made a commitment (CoT124, Volume 1, Annex 5.3: Commitments Register (AS-030)) that where mitigation is required for construction activities at Blackpool Road Recreation Ground (for example, the relocation or provision of alternate amenities), these measures will be secured via separate agreements with the relevant parties. For example, via section 106 agreements under the Town and Country Planning Act 1990 and/or section 111 agreements under the Local Government Act 1972.</p> <p>Further to CoT124, the Applicants can confirm that they are in discussions with Fylde Borough Council and St Annes football club to agree suitable mitigation measures in relation to recreational impacts of construction on the playing fields</p>
REP1-081 081.5	<p>The application could sterilise, curtail, and/or delay potential private sector property investment within the locality, with the potential loss of required investment, and delay in receiving new business rates or council tax. For example, the application lacks sufficient detail regarding the management of surface and sub-surface water drainage during construction and operation. The Council is unable to determine how landholdings are affected by any</p>	<p>The Applicants note the concerns raised regarding increased surface and sub-surface water and its potential impact on investment in the area. An assessment of the potential for increased flood risk arising from additional surface water runoff is presented within section 2.11.3 of Volume 3, Chapter 2: Hydrology and flood risk of the ES (APP-070). An Outline Code of Construction Practice (APP-193) has been prepared and submitted with the application for development consent. The Outline CoCP includes measures in relation to flood risk during the construction phase (which is secured via Requirement 8 of Schedules 2A and 2B of the draft DCO (REP1-008)). The measures include ensuring</p>

Reference	Written Representation Comment	Applicants' response
	changes to site drainage, on which the Council has spent significant funds upgrading and which is a major issue of concern for stakeholders across Fylde.	that surface water runoff is intercepted and attenuated on site, and that surface water discharges are controlled in quality and volume to ensure there is no increase to flood risk. The Applicants have committed to developing field drainage plans in consultation with landowners, in this case Fylde Council, and if required installing additional land drainage to ensure existing drainage of land is maintained during and after construction (see CoT84 of Volume 1, Annex 5.3: Commitments register of the ES (AS-030)). The Outline Soil Management Plan (APP-200) details the role of the Agricultural Liaison Officer (ALO) who will be responsible for engaging with landowners regarding existing drainage systems pre construction and who will complete an onsite review one year into the aftercare period to assess the effectiveness of reinstated drainage. The commitments as described above will ensure the Applicants work with landowners to develop a drainage strategy to ensure that any drainage impacts from the development are minimised on the Council's land.
REP1-081 081.6	Highways considerations are not fully quantified in the application, with insufficient detail in the CTMP and TMP, particularly, on routing, traffic quantum, and cumulative impacts of current uses. Whilst highways are an upper tier LCC function the associated impact from diversions and closure timings and extent can be detrimental to tourism and events that are core to services in Fylde. The application reserves maximum flexibility to the applicants including what appear as access routes into and out of the airport (which is in Fylde), residential areas, SSSI and public open space. The beach affected by the application is in Fylde with various designations for conservation, sea defence, leisure etc.	<p>A comprehensive Outline Construction Traffic Management Plan (OCTMP) (APP-211) has been submitted with the DCO application. The Applicants have met with relevant highway authorities (Lancashire County Council, National Highways and Blackpool Council) to discuss their comments on this outline plan and are processing updates as submitted at Deadline 2.</p> <p>The Applicants would note that the requirement to comply with the delivery routes and numbers assessed within Volume 3: Chapter 7 Traffic and Transport (APP-108) is captured within the OCTMP (APP-211). The OCTMP includes details of measures to manage, monitor routing and vehicle number and also to address any non-compliance.</p> <p>The Applicants would note that the plan is an outline document that would be developed into a detailed CTMP prior to commencement of construction. The requirement to agree the detailed CTMP(s) with the relevant highway authority is secured by Requirement 9 of Schedules 2A and 2B of the draft DCO (REP1-008).</p> <p>The Applicants would also note that the OCTMP would form part of the tender package to contractors bidding for work on the Transmission Assets and the Applicants would reiterate that adherence to the approved plans would be a contractual requirements with the ability for the LPA to take enforcement action if required.</p>

Reference	Written Representation Comment	Applicants' response
REP1-081 081.7	The application does not offer certainty as to the extent, reasons and duration of interference, both during and after construction therefore it overreaches and fails to adequately justify the extent and necessity of the rights to be acquired. The lack of this information means that the Council cannot fully consider the impact on its own land holdings, because of the application.	<p>As set out in response REP1-081 081.3 the draft Development Consent Order (REP1-008) includes the description of works to be undertaken on the land by reference to the relevant Work Nos shown on the Works Plans (AS-016 and AS 0-17).</p> <p>Paragraphs 1.10.1.1 -1.10.1.12 within the Statement of Reasons (REP1-012) includes the Applicants' case for powers of compulsory acquisition sought and includes the plots and summary of the menu of rights and requirement for those powers. Paragraphs 1.10.1.3 – 1.10.1.19 include the summary of rights sought over the plots and further justification. Further detail on the rights sought over the plots are set out within Tables 2a and 2b of the Book of Reference (REP1-014) which provided detail on the land rights sought and the restrictive covenants proposed over the land in the future to ensure protection of the assets. In addition to the above, the Applicants set out their case and approach to compulsory acquisition during Compulsory Acquisition hearing 1 and therefore refer the Council to paragraphs 1-33 of The Applicants' Hearing Summary of the Compulsory Acquisition Hearing 1 - Rev F01 (REP1-036).</p> <p>As noted above, it is in the commercial interests of both Morgan OWL and Morecambe OWL to ensure continued cooperation where possible to avoid unnecessary costs, delays or disruption. Requirement 3 of Schedules 2A and 2B of the draft Development Consent Order (REP1-008) requires each Applicant to submit details of the stages of their respective onshore and intertidal works to the relevant local planning authority (LPA) for approval prior to commencement. This provides adequate notification to the relevant planning authorities in relation to the Applicants' proposed overarching delivery of the construction of the Project.</p> <p>The Applicants note that the compulsory acquisition powers must be exercised within 7 years of the Order being made. Therefore, this places a limit on the timeframe within which construction can take place for both Morgan OWL and Morecambe OWL.</p> <p>The Applicants are engaged in continued discussions and negotiations with landowners, including compensation provisions to address potential impacts, where these cannot be avoided.</p>
REP1-081 081.8	The application refers to biodiversity offset mitigation measures in and around Fairhaven Lake that the Council has had no record of and would need to understand what	As set out in the Statement of Reasons (REP1-013), both Morgan OWL and Morecambe OWL are also seeking rights over an area of land at Fairhaven Saltmarsh Work No. 49A/49B (plots 19-001 and 19- 002). This land is needed to reduce potential impacts of

Reference	Written Representation Comment	Applicants' response
	the works may be and the intended location. Any biodiversity mitigation measures would need to be aligned to council environmental priorities and plans.	<p>disturbance on intertidal waders during construction, operation and maintenance, and decommissioning of the Transmission Assets to account for cable installation, repair and reburial events proposed within the Intertidal Infrastructure Area.</p> <p>The Applicants note measures identified through the EIA to mitigate environmental impacts caused by the Transmission Assets will be delivered to comply with the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017. The Applicants site-specific surveys (documented in Volume 3, Annex 4.2: Wintering and migratory birds technical report [APP-092 and APP-093] and Annex 4.3: Intertidal birds technical report [APP-094]) indicate that birds from the existing high roosts at Fairhaven Saltmarsh are disturbed by recreational users and as a result, the disturbed birds use the Transmission Assets landfall area for foraging and loafing. The Applicants' mitigation measures aim to reduce disturbance at Fairhaven Saltmarsh and consequently, reduce the number of birds using the landfall area. These measures will be implemented as described within the Outline Ecological Management Plan (EMP) (APP-212). Appendix B of the Outline EMP (APP-212). The Ecological Management Plans are secured under Requirement 12 of Schedules 2A & 2B the draft DCO (REP1-008). Detailed EMP(s) will be approved by the relevant planning authorities in consultation with Natural England.</p>
REP1-081 081.9	For the reasons stated above the Council requests to be registered as an Interested Party to the examination in its capacity as a landowner and reserves the right to make further representations during the examination process in response to any further information provided by the applicant. Fylde Council in capacity as a landowner directly impacted by the proposals in the application hereby gives notification of the intention to attend the open floor hearing on Tuesday 24 June 2025 at 6.30pm and notification of the intention to be included on accompanied site inspection on Wednesday 25 June 2025 at 9.00am and Thursday 26 June 2025, if required.	The Applicants note the response.

2.2 Angela Margaret Laycock

Table 2.2: REP1-106 – Angela Margaret Laycock

Reference	Written Representation Comment	Applicants' response
REP1-106 106.1	This cable route will significantly impact my family, myself, and our business, as well as other Fylde landowners, businesses, and residents, particularly in rural areas. The project's scale is substantial due to the width of the corridor and the lengthy timeframe required for completion. At 122 meters wide, it exceeds the width of a motorway, and the projected duration of 5 to 8 years or more means that the land will be out of action for an extended period. It seems inefficient that the two companies involved cannot coordinate their efforts to complete the on-shore infrastructure simultaneously, rather than sequentially over several years.	The Applicants refer to RR-0141 141.2 (PDA-007) which responds to the same points in this Written Representation made by Ms Laycock.
REP1-106 106.2	The cable route will affect agricultural grade 2-3 land, rendering at least four fields unfarmable during the project's duration. This will eliminate our Christmas Tree Plantation and disrupt our cropping and grassland program, which operates on a 3–4- year rotation. Consequently, it will become challenging to sustain our beef cattle unit, consisting of 200 to 250 animals, as we rely on growing crops to feed them and maintain traceability in their diet. We cultivate cereals, grass, maize, and Christmas trees.	The Applicants refer to their response RR-0141 141.3 (PDA-007) regarding the impact on land, The Applicants are engaged in continued discussions and negotiations with landowners, including compensation provisions to address potential impacts, where these cannot be avoided.
REP1-106 106.3	The cable route passes through our Christmas Tree Plantation, which is at various stages of growth and development. This project would halt the planting schedule and development of this part of our business. Access to	The concerns around the impact on the Christmas Tree Plantation are noted and the Applicants refer to their response RR-0141 141.3 (PDA-007) which explains the trenchless crossing of this land proposed to avoid surface effects and mitigate impacts to the business.

Reference	Written Representation Comment	Applicants' response
	<p>the field may be impeded due to Morgan and Morecambe's (M&M) access being situated in the same area. The Christmas Trees has been an established business for over 20 years, servicing town centres and Lytham, and it is a significant income stream for us. The placement of the cable route along Ballam Road and Peel Road could interfere with or even halt our operations due to the farm's location, potentially reducing revenue and causing a loss of income for up to 10 years. Additionally, there are two designated M&M compounds around the Ballam Road and Peel Road Junction on our land, which could disrupt the selling and delivering of trees.</p> <p>The Christmas Tree plantation also offers a place where flora and fauna survive. It supports various wildlife & insects, and we have seen orchids there in the past. It is a magical place.</p>	
REP1-106 106.4	<p>The traffic is anticipated to increase beyond the original design capacity of the roads. Peel Road and Ballam Road have a notably uneven camber with a 40mph speed limit, but certain sections require driving at 15 mph for safety. These roads contain numerous potholes, and the edges are deteriorating.</p> <p>Large vehicles often struggle to pass each other and occasionally fall off the road into the fields. The road infrastructure is inadequate and has not been properly maintained by Lancs County Council, likely due to budget constraints. This issue is common among many rural roads in the area. Additionally, internal road planning needs consideration. When constructing a slurry store, we reinforced the foundation significantly for stability. Heavy lorry traffic on the fields run the risk of sinking due to unstable ground. This instability has previously caused</p>	<p>With regard to comments about route geometry and highway condition, the Applicants refer to their response RR-0141 141.4 (PDA-007).</p> <p>With regard to comments upon the movements of heavy construction traffic across fields, the Applicants would note the commitment to the installation of temporary haul roads (Volume 1, Annex 5.3: Commitments Register, commitment: CoT85 (AS-030)). The temporary haul roads will be installed within the onshore export cable corridor to reduce the number of HGVs travelling on the public highway and avoid the requirement to drive across fields. Further details of the haul road construction are provided within section 3.15.3.20 to 21 of the Project description (AS-024). In summary, the temporary haul roads will be made up of permeable gravel aggregate, with a geotextile or other type of protective matting. This construction would assist in the distribution of vehicle loads, with the permeability supporting drainage requirements. Upon the completion of construction works, the temporary haul roads will be removed and the land reinstated.</p>

Reference	Written Representation Comment	Applicants' response
	issues with machinery. Restoring the field post-construction could also render the land unsuitable for farming, similar to the conditions experienced at the Anna's Road Fracking site.	
REP1-106 106.5	<p>This area is highly susceptible to flooding. Since the Environment Agency assumed responsibility for the assets at Dock Bridge Pumping Station, the water table has remained higher than appropriate levels. Field conditions from September through March and April are extremely wet, resulting in numerous flooded fields along the cable route. The soil consistency resembles porridge.</p> <p>Branch Drain, Main Drain, and Wrea Brook serve as the primary channels for water to flow out to sea, with the cable route intersecting or traveling alongside these channels at various points. I am greatly concerned about the potential collapse or interference with these drains, which are classified as main rivers in this region. Such issues could lead to severe flooding of extensive land areas and surrounding regions, degrading prime agricultural properties and causing significant property damage. Additionally, there is a risk of flooding in East Lytham due to rapid water backup caused by recent developments over the past few years. This drainage system dates back to the 1840s.</p> <p>The Environment Agency has been experiencing recurring issues with the pumps and penstock gates. The Fylde region faces significant water and flooding problems even after 1-2 inches of rainfall, as the current system cannot adequately handle such influxes. It is imperative that M &</p>	The Applicants refer to their response to RR-0141 141.5 (PDA-007) which addresses this point.

Reference	Written Representation Comment	Applicants' response
	M does not place additional strain on the drainage system by discharging their water into this already volatile network. There is also no mention in documents of access for maintaining the waterways.	
REP1-106 106.6	Land issues are numerous. M & M's travel and disruption of land drains would likely cause flooding. For half the year, land drains are invisible under grass or topsoil. Subsoil, known as "Blue Billy," moves underground and can harden like concrete if exposed, making the land unfarmable. M & M also failed to consider access for maintaining main river waterways for farmers and the Environment Agency.	The Applicants refer to their response RR-0141 141.6 (PDA-007) which addresses this point.
REP1-106 106.7	There is a 13 km restricted area around Blackpool Airport and BAE Warton. This scheme could pose security risks and interfere with electronics and radar, similar to why wind turbines are prohibited on our farm.	The Applicants refer to their response RR-0141 141.7 (PDA-007) which responds to this point.
REP1-106 106.8	The proposed scheme is expected to cause significant disruptions to farming operations in the area, potentially impacting the future of our farming business. The scheme does not appear to offer any local benefits, either rurally or in the urban areas of Lytham St. Annes, Warton, Wrea Green, Newton, and Freckleton. Local businesses, including ours, may experience operational challenges leading to economic decline in South Fylde. The hamlet of Ballam and its surroundings could face issues such as noise, pollution, reduced air quality, and potential impacts on livestock welfare. There is also concern about the ability	<p>The Applicants addressed concerns relating to agricultural land impacts at section 2.3 of The Applicants' Response to Relevant Representations Part 1 - Introduction and thematic responses (PDA-005) which sets out how the Applicants have sought to minimise impacts on agricultural land.</p> <p>Potential impacts on farm holdings and agricultural land were also discussed at Issue Specific Hearing 1 (see paragraphs 65 – 75 of The Applicants' Hearing Summary of Issue Specific Hearing 1 – Day 2 (REP1-035)) and Compulsory Acquisition Hearing 1 (see paragraph 22 of The Applicants' Hearing Summary of Compulsory Acquisition Hearing 1 (REP1-036)) following which the Applicants have responded to a number of Hearing Action Points</p>

Reference	Written Representation Comment	Applicants' response
	to participate in farming incentive schemes, which provide essential income.	relating to these matters. Please see ISH1_46, ISH1_47 and CAH1_5 of The Applicants' response to Hearing Action Points due at Deadline 1 (REP1-037).
REP1-106 106.9	Young people in the region are highly dedicated to agriculture, and this scheme might challenge their efforts amidst other political pressures and regulations. The project could result in poorer land drainage, increased flooding, obstacles like junction boxes in fields, loss of business revenue, and soil degradation that may take decades to recover. This could ultimately reduce the value of the land and farm.	<p>Land Drainage</p> <p>The Applicants have committed to developing field drainage plans in consultation with landowners and if required installing additional land drainage to ensure existing drainage of land is maintained during and after construction (see CoT84 of Volume 1, Annex 5.3: Commitments register of the ES (AS-030)). The Outline Soil Management Plan (APP-200) details the role of the Agricultural Liaison Officer (ALO) who will be responsible for engaging with landowners regarding existing drainage systems pre construction and who will complete an onsite review one year into the aftercare period to assess the effectiveness of reinstated drainage.</p> <p>Flooding</p> <p>The Applicants refer to their response RR-0141 141.6 (PDA-007).</p> <p>Impact on farming and link boxes</p> <p>The impacts of the Transmission Assets with respect to existing farming activities (e.g., agricultural land holdings) are considered in section 6.11 Volume 3, Chapter 6: Land Use and Recreation (APP-104). The assessment has considered the permanent loss of agricultural land and disruption to existing farming operations as a result of the presence of link boxes. This chapter summarises that where possible link boxes will either be located within non-agricultural land or installed on the boundaries of agricultural land to minimise the loss of agricultural land and disruption to farming operations.</p> <p>At this stage the precise locations of the link boxes cannot be determined as they are dependent on the final cable design and procured cable lengths. The maximum design parameters allow for a total of up to 110 link boxes along the cable corridor, 72 for Morgan Offshore Wind and 38 for Morecambe</p>

Reference	Written Representation Comment	Applicants' response
		<p>Offshore Wind (see Table 3.18 of Volume 1, Chapter 3: Project description (AS-024).</p> <p>Soil condition</p> <p>The Applicants are mindful of the importance of recording the condition of agricultural soils prior to construction works commencing and have made a commitment (see CoTs 22, 25 and 81 of Volume 1, Annex 5.3: Commitments Register of the ES (AS-030)) to ensure soils are recorded and appropriately managed through the construction phase. The Outline Soil Management Plan (APP-200) sets out measures to protect soil quality and structure during construction, ensuring that the land remains viable for farming in the long term. This includes collation of soils information and samples and the production of an aftercare plan to be produced for agricultural areas within the Onshore Order Limits which will be subject to agreement with the affected landowner(s).</p> <p>Land value</p> <p>The Applicants are committed to seeking voluntary agreements for the land rights sought which will include appropriate financial payment. In addition to compensation for the land taken / land rights sought, there may also be elements of claim under Severance, Injurious Affection and Disturbance, these claims would be settled in line with the Land Compensation Act 1961, Land Compensation Act 1973 and Compulsory Purchase Act 1965.</p> <p>The Outline Soil Management Plan (APP-200) also includes methods of soil management during the construction of the Transmission Assets to ensure soil nutrients are maintained where possible. Within the outline plan there are also provisions for aftercare and handover which will be agreed with the landowner and Agricultural Liaison Officer (ALO). Following the end of the first year of the aftercare period, there will be an onsite meeting to establish what further management is required to ensure the land can be farmed as soon as practicable once the restored land is in a suitable condition.</p>

Reference	Written Representation Comment	Applicants' response
		<p>This is secured in the DCO through Requirement 8 (Code of Construction Practice), which includes production of a Soil Management Plan in accordance with the Outline Soil Management Plan (APP-200) and Requirement 16 (Restoration of land temporarily used for construction) of the draft Development Consent Order Schedule 2A and 2B (REP1-008).</p> <p>The detailed Soil Management Plan(s) will be prepared during detailed design and will be agreed with the relevant planning authority. As outlined within the Outline CoCP (APP-193), the ALO will be appointed in time for the commencement of pre-construction activities and will be the dedicated point of contact for ongoing engagement about practical matters with landowners, occupiers and their agents during the pre-construction and construction phases.</p> <p>Skills and employment</p> <p>An Outline Employment and Skills Plan has been prepared and submitted as part of the application for development consent (APP-239) to support the delivery of economic benefits associated with the Transmission Assets. Section 1.7 includes outline principles, ranging from engagement with all stages of the education system to approaches to recruitment and ongoing workforce training and development. Table 1.4 sets out outline initiatives that aim to work to support employment and skills development in alignment with the outline principles. The outline initiatives will be developed by the Applicants in consultation with the relevant stakeholders. The requirement to produce detailed Employment and Skills Plan(s) in accordance with the OESP in consultation with Lancashire County Council is secured by Schedules 2A and 2B of Requirement 19 of the draft DCO (REP1-008).</p>
REP1-106 106.10	While I support the development of offshore wind farms, I oppose the current cable route through Fylde. Alternatives such as Hill House in Thornton, Blackpool's Local Enterprise Zone, or the River Ribble must be considered.	The Applicants refer to paragraphs 2.31.2.14 – 2.31.2.18 of The Applicants' Response to Relevant Representations Part 1 – Introduction and thematic responses (PDA-006) and Hearing Action Point ISH1_9 (REP1-039) which responds to the suggestion of an alternative connection route.

2.3 Anne Mason

Table 2.3: REP1-109 – Anne Mason

Reference	Written Representation Comment	Applicants' response
REP1-109 109.1	We are working a family farm and landowners of some 73 years which spans 3 generations of the same family. This proposed cable route across our farm land, some of the best farmland in the country effectively cuts our farm in two and crosses the land we farm in three different places. The proposed substation looks likely to be sited on an additional parcel of our family land farmed by our holding.	Through the ongoing engagement between the Applicants, Ms Mason and their appointed land agent, discussions regarding suitable mitigation measures are progressing with the aim of reducing disruption to the farm holding during the construction period where possible. The Applicants understand that part of the substation for Morgan Offshore Wind Limited will be sited on plots 11-123A, 11-124A, 12-019A, 12-027A under the ownership of The Executor Of The Estate Of The Late John Mason & The Executor Of The Estate Of The Late Irene Mason (REP1-004) which is currently farmed as part of Ms Masons farm holding.
REP1-109 109.2	It's hard enough trying to make a living as a livestock farmer these days without the threat of this cable ruining our most valuable asset- our farmland- and disrupting our livelihood for many years. I understand that the two parties involved in the project will not commit to the simultaneous installation of their cables (Project representatives' statement in Landowners' meeting with at St Matthew's Church Ballam 04/12/2024). This would seem basic common sense to me. This could potentially mean that we will not see our farmland restored to any workable order in our lifetime. How are we to earn our living? How are we to produce food for our nation? Or indeed to keep our local farmworkers in their jobs?	The Applicants refer to paragraphs 2.3.2.1– 2.3.2.10 and 2.22.2.5- 2.22.2.7 of The Applicants' Response to Relevant Representations Part 1 – Introduction and thematic responses (PDA-006), RR-745.9 (PDA-007) and to ISH1_28: S_D1_5.2 Annex 5.2 to the Applicants response to Hearing Action Points: ISH1 6, 8, 9, 19, 26 & 28 - Rev F01 (REP1-039) which explains why the Applicants are unable to commit to concurrent construction of the Transmission Assets.
REP1-109 109.3	We have temporarily paused our working Dairy Farm enterprise due to [redacted]. All equipment and resources have been maintained with the intention of a return to dairy farming in the near future. The uncertainty around this project has frustrated our attempts to find a Dairy Farming Tenant. We do not farm for money therefore compensation is not the answer. It's about putting our hearts and soul	The Applicants acknowledge the uncertainty during the application and examination process. Until such time as a decision is made by the Secretary of State, expected April 2026, the Applicants have no certainty the Project can proceed and therefore encourage Ms Mason to continue with the plans and future planning for the farm. The Applicants will assist where possible to

Reference	Written Representation Comment	Applicants' response
	into the land and this cannot be distilled into monetary value, nor perhaps understood by large corporations who stand to profit from this project of so called 'green energy'.	address concerns any new tenant or occupier has in relation to the land and potential future disturbance.
REP1-109 109.4	Following concerns raised by the Examining Authority's concerns around the economic impact on the proposed project on farms along the cable corridor, (specifically if businesses would be left 'viable' when land was 'returned to agriculture' and Fylde Borough Council's similar concerns), the Examining Authority requested the Applicant to 'provide plans showing how the proposed development would affect land held by individual farms so that we can have a better understanding of the effects on each farm' Issue specific hearing 1 part 8 on 2/5/2025 at 32:00).We kindly request that details of the impact on our farm and family/other land parcels we farm be provided to us under the Freedom of Information Act. We feel the impact on our farming practice is unquantifiable.	The Applicants refer Ms Mason to S_D1_5.8 Annex 5.8 to the Applicants response to Hearing Action Points: ISH 46 Distribution of Land Holdings – Rev F01 (REP1-044) submitted in response to the Examining Authority's hearing action point.
REP1-109 109.5	It seems that the cable route will leave us with a legacy of irregular shaped parcels of land with raised manhole covers to allow for cable inspection. This will make the land impracticable to farm. How are our children expected to the prime grazing land which has been mutilated by this unsolicited project? This project continues to cause us acute psychological stress when we have more pressing to consider.	<p>The works on the majority of the holding are temporary while the onshore export cables are installed, and therefore the disruption will also be temporary, and the land reinstated to its agricultural use as soon as practicable following completion of the cable installation allowing current farming practices to resume.</p> <p>The Outline CoCP secured through Requirement 8 of Schedules 2A and 2B of the draft DCO (REP1-008), sets out some examples of the role of the Agricultural Liaison Officer who will discuss accommodation works including crossing points to access land with Ms Mason where practicable to minimise the impact of the works on the landholding.</p> <p>In relation to the cable link boxes, Volume 1, Chapter 3: Project Description (APP-024) states:</p> <ul style="list-style-type: none"> • "Each [Transition Joint Bay] will contain an underground link box, contained within an underground chamber and will be accessible via an inspection cover at ground level." (paragraph 3.14.4.4)

Reference	Written Representation Comment	Applicants' response
		<ul style="list-style-type: none"> • “Link boxes are typically located adjacent to the joint bay locations; they comprise concrete chambers with a manhole cover set at ground level to provide access during the operation and maintenance phase. Access to link boxes is anticipated on an annual basis for routine inspection, for example to check on condition and water egress.” (paragraph 3.15.2.11) • “Joint bays will be completely buried, with the land above reinstated. An inspection cover will be provided on the surface for link boxes for access during the operation and maintenance phase.” (paragraph 3.15.5.3) <p>The impacts of the Transmission Assets with respect to existing farming activities (e.g., agricultural land holdings) are considered in section 6.11 Volume 3, Chapter 6: Land Use and Recreation (APP-104). The assessment has considered the permanent loss of agricultural land and disruption to existing farming operations as a result presence of link boxes. This chapter summarises that link boxes will be located either within non-agricultural land, where possible or on the boundaries of agricultural land to reduce the loss of land and disruption to farming operations.</p> <p>Volume 1, Annex 5.1: Human health (APP-035) considers the population health implication due to changes from the ‘Transmission Assets’. The Applicants understand the DCO / NSIP process along with agreements being sought can be stressful on landowners due to the complicated nature of large scale infrastructure projects and rights being sought across their land. The Applicants are keen to engage with Ms Mason to resolve her concerns about the Transmission Assets.</p> <p>With regard to community concern about the Project and associated mental health effects, the Environmental Statement assessments deliver the statutory requirement to set out the likely significant effects of the Project. The availability of such information, including on human health in the Non-Technical Summary (APP-020), supports the community understanding of the likely project impacts and outcomes. Availability of such information is an important factor in supporting population mental health, including in relation to concerns that may arise during the application determination process. Further the Outline Communications Plan (APP-194) provides a basis for information sharing and for people to express concerns during the</p>

Reference	Written Representation Comment	Applicants' response
		<p>construction period, which is supportive of community mental health and wellbeing.</p> <p>The UK Health Security Agency and the Department of Health's Office for Health Improvement and Disparities have reviewed the assessment and state that they agree with the method.</p> <p>The Applicants acknowledge the uncertainty concerns raised by Ms Mason and the importance of the future generation of farming. Where suitable the Applicants encourage those to be involved in the heads of terms for the voluntary rights sought to ensure they are aware of the protections and restrictions in place when working around infrastructure.</p>
REP1-109 109.6	<p>We have been met with threats of Compulsory Purchase Orders and legal action should we attempt to impede investigative work across our land. Reassurances of respect and commitment to working with landowners have proved near worthless promises. We have experienced wires from flags being left in grazing fields for cattle- a wire can kill a cow when ingested- Contractors digging exploratory trenches have already left open road gates on our farm – potentially endangering the public driving down the local country lanes when they encounter cattle straying onto the highway. replicate soil which has taken thousands of years to develop. The projects' Soil Management Plan has already proved worthless in protecting our productive grazing land from damage done during the initial investigative work. We have photographic evidence which clearly demonstrates on a small scale the impact of the soil structure on our prime grazing land. This will be provided upon request.</p>	<p>The Applicants are in ongoing engagement with Ms Mason and their appointed agent regarding the land rights sought through a voluntary agreement with the most recent meeting on the 29th May 2025.</p> <p>The Applicants acknowledge the issues during the intrusive survey campaign in 2024. Once notified, the Applicants revisited the land to ensure any further wire flags were removed from site and prohibited the further use of wire flags on site and instead used bamboo sticks or spray paint, which was agreed to be more suitable with Ms Mason and other landowners impacted by the intrusive survey campaign and is the agreed approach going forward. The Applicants understand that the issues that occurred were rectified as soon as they were brought to their attention and included within future site briefings.</p> <p>The Applicants understand the concern regarding gates being left open and understand the importance of leaving gates as they are found on site to allow the movement of cattle through fields or to prevent any risks of livestock getting out.</p> <p>The Applicants' contractors at the time of the works were not subject to the detailed controls proposed within the draft Development Consent Order and therefore the outline plans referenced do not apply to these works. Through</p>

Reference	Written Representation Comment	Applicants' response
		<p>the consent, if granted, there will be defined access routes and boundaries which enforce control further. Further works, if undertaken prior to any consent (should that be granted) will take on board lessons learned from this.</p> <p>The Applicants acknowledge that land does take time to come back to its full yield potential following intrusive surveys taking place and can confirm future crop loss has been accounted for within the compensation claim settled between the Applicants and Ms Mason' land agent.</p>
REP1-109 109.7	<p>We are required to meet stringent criteria to ensure our farming enterprise adheres to the Red Tractor standard/ dairy contract with Arla. Red Tractor Biosecurity Policy requires farmers to establish controls to 'manage biosecurity risks on farm including risks from equipment (contractors' equipment including vehicles.... Farm visitors that have access to livestock B.Bl.1b); and that 'DEFRA approved disinfectant/cleaning equipment is available for use on boots/clothing/vehicles and facilities (B.Bl.2a). Will every vehicle coming onto our land and every individual disinfect tyres/work boots before entering our land to prevent diseases such as Foot & Mouth/TB being transferred from farm to farm? Who will ensure contractors' compliance?</p>	<p>This Outline Biosecurity Protocol (APP-205) forms an appendix to the Outline Code of Construction Practice (CoCP) (APP-193). Following the granting of consent for the Transmission Assets, detailed Biosecurity Protocols will be prepared as a part of the detailed Code of Construction Practice(s) on behalf of Morgan OWL and/or Morecambe OWL, prior to commencement of the relevant stage of works and will follow the principles established in the Outline Biosecurity Protocol. The detailed Biosecurity Protocol will require approval by the relevant planning authority following consultation with relevant stakeholders. The Applicants and all appointed contractors will be responsible for the implementation of the detailed Biosecurity Protocols</p> <p>The Outline Management plans will be agreed and discharged by the Local Planning Authority. Once approved the plans become enforceable. The LPA has the power to inspect the site and enforce compliance, if so required. Enforcement can include stop notices, enforcement under the Planning Act 2008 or through modification request.</p>
REP1-109 109.8	<p>During the investigative phase which has been underway for a lengthy period already, we established a Whatapp group to enable us to establish when contractors were accessing on and working on the land which we farm. This was agreed at a meeting with our land agent, representatives from the project and their land agent Dalcour McLaren. We required prior notice of dates/exact</p>	<p>The Applicants refer to the above responses to REP1-109.6 and REP1-109.7.</p>

Reference	Written Representation Comment	Applicants' response
	location of visitors with signing in and out. This seemed basic common sense to us and provided assurances that contractors working alongside our livestock /machinery were all accounted for under basic Health & Safety protocols. This is common practice in most workplaces and good manners considering workers were only on site permissively. It was disappointing to have several contractors not following protocol as agreed in the meeting by the project land agents Daclour McLaren on 31st May, 2024. Evidence of such failure to follow agreed protocol can be provided to the Examining Authority.	
REP1-109 109.9	We are grateful that Examining Authority raised our oral submission concerns around gates left open on our holding during the surveying process but disappointed by responses by at Session 8 of the Issue Specific Hearing (29.53 minutes).Outline Codes of Practice submitted as part of the DCO may not have been in operation at the time of the surveys, but policies and ALOs on site will not prevent contractors from leaving gates open. This project is only as good as the contractors on the ground. stated that ALOs will be on site and known to the farmers yet Agricultural Liaison Officers were already on site on the days when gates were left open and dangerous wires left in fields where cattle graze. Contractors continue to fail to follow agreed protocol regarding accessing our land. (Details available)	The Applicants have not yet appointed contractors for the main works who are subject to the conditions in the Development Consent Order. The Agricultural Liaison officer will be bound by the management plans as approved through the Development Consent Order, which were not in place at the time of the intrusive surveys undertaken. In addition to these measures, the ALO and contractors will be subject to site supervision by the Applicants.
REP1-109 109.10	Contractors continue to fail to follow agreed protocol regarding accessing our land. (Details available) The Outline Code of Construction Practice also states Co T97 'outline Cocp include that farmers' access routes between field within a farm holding will be maintained where reasonably possible or alternative routes agreed with the landowner to ensure the continued operation of agricultural	As confirmed to Ms Mason, the Applicants do not propose to 'take' any of the farm tracks rather have included the ability to use farm tracks and/or existing access points, where sensible and required, to facilitate access to the cables for future operation and maintenance. The Applicants will be proactively seeking landowner engagement on site during the works and during pre-construction activities to discuss and better

Reference	Written Representation Comment	Applicants' response
	land holdings during the construction phase , where this may be possible'. We have built a series of single farm tracks which allow us to access most of our farmland over the 73 years we have farmed the land. The tracks are in use 24/7 365 by farm machinery, to move livestock between pastures, or on foot to check crops. In a meeting believed to be on 21/3/2024 we were informed by of Dalcour McLaren of their intention to 'take' these tracks for access, When questioned about the word 'take' agreed that it was 'unfortunate' and reframed it as 'use ' the tracks. Discussion followed regarding how were we to continue to farm.	understand the use of the tracks at the time of the projects' works so the Applicants can ensure continued operations for the farm holding.
REP1-109 109.11	Policies sound great on paper but the practicalities such as head to head traffic might be problematic. Whose business takes priority? The landowner who requires the flexibility to access their land when conditions are favourable/staff available? Are we expected to ask for permission before we let our cattle out to graze? The practicalities of this project need addressing properly rather than generating endless meaningless policies. How are our children expected to continue farming when our most valuable asset- the land has been devastated and devalued by this unwelcome and uninvited project?	<p>The Applicants have committed (CoT96 of Volume 1, Annex 5.3: Commitments Register of the ES (AS-030)) to developing detailed CoCP(s) in accordance with the outline Code of Construction Practice (APP-193). The Outline CoCP includes that farm access routes between fields within a farm holding will be maintained (where reasonably practicable), or alternative routes agreed with the land holder to enable the continued operation of agricultural land holdings during the construction phase. This is secured by Requirement 8 within Schedules 2A and 2B of the draft DCO (REP1-008). Final CoCP(s) will be implemented by the Applicants as approved by the relevant planning authority, as appropriate.</p> <p>This commitment also includes provision for an Agricultural Liaison Officer who will be appointed ahead of commencement of pre-construction activities and will be the point of contact for ongoing engagement about practical matters, this includes conversations about the requirement and use of crossing points where required to access severed land during construction.</p> <p>The Applicants are in ongoing dialogue with Ms Mason's representatives regarding the land rights sought for the Transmission Assets and are committed to securing a voluntary agreement on suitable commercial terms. If it is not possible to reach a voluntary agreement, Ms Mason will be entitled to compensation for the land rights sought.</p>

Reference	Written Representation Comment	Applicants' response
REP1-109 109.12	In our opinion, the project is ill conceived, rushed and a nonsense. We urge the Examining Authority to consider the devastating impact that this project will have upon the hardworking farmers along the cable route. We invite the Examining Authority to visit our farm during the forthcoming site Inspection and request that this proposed route be scrapped and alternative routes properly investigated. Thank you	The Applicants' note Ms Mason's comment and the request that her farm is visited as part of the Accompanied Site Inspection (ASI).

2.4 Christine Fare, John Fare & Fare Farms Ltd

Table 2.4: REP1-119 –Christine Fare, John Fare & Fare Farms Ltd

Reference	Written Representation Comment	Applicants' response
REP1-119 119.1	<p>Introduction</p> <p>I act on behalf of the above who live on and whose Farm is significantly affected by the above Schemes and in particular the Sub-Station 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</p>	The Applicants note the response and refer to their response PDA- 044.1 (REP1-061) regarding the assessment completed on the impact of the proposed substations to the holding.

Reference	Written Representation Comment	Applicants' response
	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.	
REP1-119 119.2	<p>Submission</p> <p>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.</p> <p><u>Assessment of Principal Issues</u></p> <p>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</p> <p>Aviation</p> <p>None</p>	The Applicants refer to their response PDA-044.2 (REP1-061) which addresses these comments.
REP1-119 119.3	<p>Compulsory Acquisition and Temporary Possession</p> <p>It is my submission on behalf of my clients that the extent of the land required under powers sought under the draft</p>	The Applicants refer to their response PDA-044.3 (REP1-061) which explains the powers for compulsory acquisition and temporary possession sought.

Reference	Written Representation Comment	Applicants' response
	<p>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.</p>	
<p>REP1-119 119.4</p>	<p>Ecology</p> <p>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</p>	<p>The Applicants refer to paragraph 2.12.2 of The Applicants' Response to Relevant Representations Part 1 - Introduction and thematic responses (PDA-005) regarding the ecology data collected. The Applicants are confident that their selection of the substation sites and the assessment of the effects is based upon sufficient ecological data. The Applicants confirm that the purpose of any ongoing surveys is to inform the design of the detailed mitigation measures and any requirements for EPS licences .</p>

Reference	Written Representation Comment	Applicants' response
	affected by those Sub-Stations and therefore that site selection process has to be questioned as to its validity from an environmental perspective.	
REP1-119 119.5	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.	The Applicants refer to paragraph 2.16 of The Applicants' Response to Relevant Representations Part 1 - Introduction and thematic responses (PD005) regarding the flood risk concerns raised.
REP1-119 119.5	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.	The Applicant refers Mr Coney to the hearing summaries (document references S_D1_3 Applicants' Hearing Summary ISH1) on the cumulative assessment discussed during the issue specific hearings on 30th April and 1st May 2025 and S_D1_5.2 Annex 5.2 to the Applicants response to Hearing Action Points: ISH1 6, 8, 9, 19, 26 & 28 - Rev F01 (REP1-039).
REP1-119 119.6	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	The Applicants refer to their response PDA-044.7 (REP1-061) regarding the concerns on greenbelt land.

Reference	Written Representation Comment	Applicants' response
	<p>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.</p> <p>Historic Environment</p> <p>No comment.</p>	
REP1-119 119.7	<p>Land Use and Recreation</p> <p>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.</p>	The Applicants refer to their response PDA-044.9 (REP1-061) regarding the Land Use and Recreation concerns raised.
REP1-119 119.8	<p>Landscape</p> <p>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.</p> <p>Marine Physical Processes and Coastal Change</p> <p>No comment.</p>	The Applicants refer to their response PDA-044.10 (REP1-061) regarding the Landscape and visual concerns raised. .

Reference	Written Representation Comment	Applicants' response
REP1-119 119.9	<p>Noise and Vibration</p> <p>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.</p> <p>Other Offshore Matters</p> <p>No comment.</p>	The Applicants refer to their response PDA-044.12 (REP1-061) regarding the noise and vibration concerns raised.
REP1-119 119.10	<p>Social Economic Effects on Human Health</p> <p>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.</p>	The Applicants refer to their response PDA-044.14 (REP1-061) regarding the social economic effects on human health concerns raised.
REP1-119 119.11	<p><u>Specific Hearing 1</u></p> <p>Agenda Items 4, 5, 6, 7 and 8</p> <p>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; coordination 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</p>	The Applicants refer Mr Coney to the hearing summaries submitted at Deadline 1 (document references: S_D1_2 and S_D1_3) on those items discussed during the issue specific hearings on 30th April and 1st May 2025 In relation to broader site selection and coordination, the Applicants refer Mr Coney to their response to Hearing Action Points: ISH1 6, 8, 9, 19, 26 & 28 - Rev F01 (REP1-039). The Applicants maintain that these items have been adequately assessed in the Environmental Statement, in line with the parameters set out in ES Volume 1, Chapter 3: Project description (AS-024).

Reference	Written Representation Comment	Applicants' response
	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.	
REP1-119 119.12	<p><u>Compulsory Acquisition Hearing 1</u></p> <p>Agenda Items 2, 3 & 5</p> <p>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.</p> <p>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.</p> <p>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</p>	The Applicants refer to their response PDA-044.16 (REP1-061) regarding the land rights sought. The Applicants are committed to securing voluntary agreements wherever possible in order that is not necessary to exercise compulsory acquisition powers.

Reference	Written Representation Comment	Applicants' response
	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.	
REP1-119 119.13	Conclusions 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.	The Applicants note the response and will continue to engage with Mr Coney and his clients on the matters set out above.

2.5 Colin Bradley

Table 2.5: REP1-123 – Colin Bradley

Reference	Written Representation Comment	Applicants' response
REP1-123 123.1	As Agents we wish to lodge objections on behalf of the above Landowners in respect of the proposed Morecambe	The Applicants refer to their response to the relevant representation RR0280 280.2 (PDA-007) regarding consultation with landowners to date. The

Reference	Written Representation Comment	Applicants' response
	<p>and Morgan Offshore Wind Farms Development Consent Order.</p> <p>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.</p>	<p>Applicants met with Mr Bradley and his agent Mr Dennis, most recently on 31st March 2025 to discuss the topics raised within the relevant representation and which feature again within this written submission. The Applicants are striving to work with landowners and their agents to understand and discuss the impact the proposals have on their holdings and identify ways to mitigate impacts where practicable. In addition, negotiations are continuing on the Heads of Terms as set out in the response to REP1-123.11 below.</p>
REP1-123 123.2	<p>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.</p>	<p>The Applicants have addressed this in their relevant representation response RR-0280 280.3 (PDA-007).</p>
REP1-123 123.3	<p>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.</p>	<p>The Outline Code of Construction Practice (APP-193) is secured through Requirement 8 of Schedules 2A & 2B of the draft Development Consent Order (REP1-008). Following the grant of the DCO, the local authority and other relevant bodies will approve any design details in accordance with the parameters set out in the outline plans secured by the DCO. Requirement 8 of Schedules 2A&2B already includes the following wording that ensures the approved Code of Construction Practice will be complied with:</p>

Reference	Written Representation Comment	Applicants' response
		<p>3) The code of construction practice approved in relation to the relevant stage of the Project A onshore works and Project A intertidal works must be followed in relation to that stage of the Project A onshore works and Project A intertidal works. This same commitment applies for Project B.</p> <p>Pursuant to this Requirement 8, the approved Code of Construction Practice must accord with the outline Code of Construction Practice which has been submitted.</p>
REP1-123 123.4	<p>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.</p>	<p>The Surface and groundwater management plan (APP-202) which forms part of the Outline Code of Construction Practice (APP-193) includes measures ensuring that surface water runoff and site drainage from construction is intercepted and attenuated on site, and that proposed dewatering and surface water discharges to watercourses are controlled in quality and volume to ensure there is no increase to flood risk. These measures will be agreed through the discharge of requirements with the relevant authorities through the submission of detailed Surface and Groundwater Management Plan(s). This is secured through Requirement 8 in Schedules 2A and 2B of the draft DCO (REP1-008).</p> <p>The Applicants note that within the DEFRA Construction Code of Practice for the Sustainable Use of Soils on Construction Sites (PB13298) (Defra, 2018) that stockpile heights of 3-4 m are commonly used for topsoil, but heights may need to be greater where storage space is limited.</p> <p>In addition to this, the Outline Soil Management Plan (APP-200) sets out measures to protect soil quality and structure during construction, ensuring that the land remains viable for farming in the long term. Construction activities will be undertaken in accordance with the detailed Soil Management Plan(s). Section 1.6 of the Outline Soil Management Plan (APP-200) provides detail on pre-construction surveys which will be undertaken to inform the detailed Soil Management Plans. It also includes the production of an aftercare plan for agricultural areas within the Onshore Order Limits which will be subject to agreement with the affected landowner(s). This is secured in the DCO through Requirement 8 (Code of Construction Practice), which includes production of a Soil Management Plan in accordance with the</p>

Reference	Written Representation Comment	Applicants' response
		Outline Soil Management Plan (APP-200) and Requirement 18 (Restoration of land temporarily used for construction) of the draft Development Consent Order Schedule 2A and 2B (REP1-008).
REP1-123 123.5	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 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.	The Applicants understand that Mr Bradley is concerned about the use of Plot 06-078 (REP1-004). This plot is required for temporary mitigation during construction and does not form part of the Applicants' voluntary commitment to achieve biodiversity benefit. The Applicants refer to their response to the response to relevant representation RR-0277.6 (PDA-007) which sets out the requirement for the temporary mitigation. Plot 06-078 is required for the delivery for the project as it provides essential mitigation in order to reduce the environmental impact of the Transmission Assets, and therefore it is appropriate and necessary for the compulsory acquisition powers sought, albeit it is the Applicants' preference to secure the rights required through voluntary land agreements and so the Applicants will continue to engage with Mr Bradley in that regard.
REP1-123 123.6	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.	The Applicants note that onshore export cable corridor is partly located within the Lytham Moss Biological Heritage Site (BHS) (as shown on Figure 1.4 of Volume 3, Annex 3.1: Onshore ecology desk study technical study [APP-067]). The Applicants assessed the potential impact of disturbance and displacement from the construction of the Transmission Assets on non-breeding geese, ducks and swans and non-breeding waders (see section 4.14 of Volume 4, Chapter 4: Onshore and intertidal ornithology (APP-090). The assessment concludes that in the absence of mitigation the construction of the Transmission Assets would result in a significant adverse effect. On this basis, the Applicants have made a commitment (CoT 107 of Volume 1, Annex 5.3: Commitments Register) (APP-1ASAS-030) that where construction activities are undertaken along the onshore export cable corridor within areas of Functionally Linked Land (Lytham Moss Biological Heritage Site) in proximity to Higher Ballam and Lower Ballam, a mitigation area will be provided for supplementary feeding of pink-footed goose and whooper swan. With the implementation of this mitigation, the residual effect is reduced to minor adverse.

Reference	Written Representation Comment	Applicants' response
REP1-123 123.7	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	The Applicants have provided a technical note which provides detail on the site selection of the environmental mitigation and biodiversity benefit areas (Document Reference: S_D2_13). The mitigation area at Lytham Moss will provide temporary seasonal foraging ground for geese, swans and waders as replacement habitat for birds displaced by proposed construction activity within areas of Functionally Linked Land (Lytham Moss Biological Heritage Site) Figure 1.4 of Volume 3, Annex 3.1: Onshore ecology desk study technical study APP-067). The mitigation area at Lytham Moss will not adversely affect the existing nearby mitigation area (the Farmland Conservation Area).
REP1-123 123.8	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	The Applicants are aware of Blackpool Airport's concerns regarding the management of the temporary construction mitigation area at Lytham Moss and its ability to coexist with the Airport's existing wildlife management plan. The Applicants are committed to working with Blackpool Airport and are actively consulting with Blackpool Airport Operations Limited regarding these wildlife management measures.
REP1-123 123.9	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	The Applicants have addressed this in their response to the relevant representation RR-0280 208.7 (PDA-007).

Reference	Written Representation Comment	Applicants' response
	extensive indemnity in respect of any liability which may occur from contamination or waste as a result of the exercise of rights.	
REP1-123 123.10	10. We urge the Inspector to reject the application for compulsory powers for this Temporary Mitigation Area.	The Applicants are seeking temporary possession over plot 06-078 (REP1-004) which is required for the construction period. The Statement of Reasons (REP1-012), the Outline Landscape Management Plan (AS-050), and Outline Ecological Management Plan (APP-212) set out outline details of the mitigation works the Applicants consider will be necessary to meet the relevant legislative and policy requirements. This land is required to provide mitigation for potential impacts of temporary habitat loss and disturbance on geese, swans and waders during construction of the Transmission Assets. and includes the ability to provide seasonal scrapes and supplementary feeding. No permanent rights are sought over these plots and following construction they will be returned to the landowners.
REP1-123 123.11	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	As detailed within the Land Rights Tracker (REP1-065), the Applicants issued the latest populated Heads of Term on the 20 th May 2025 to Mr Bradley and his appointed agent Mr Dennis following a series of meetings with the land agent group to negotiate and update the template Heads of Term documents. The Applicant welcomes engagement on the terms issued to resolve any outstanding points of difference.

2.6 Colin Bradley and Shirley Rayner-Porter

Table 2.6: REP1-124 – Colin Bradley and Shirley Rayner-Porter

Reference	Written Representation Comment	Applicants' response
REP1-124 124.1	As Agents we wish to lodge objections on behalf of the above Landowners in respect of the proposed Morecambe	The Applicants refer to their response to the relevant representation RR0280 280.2 (PDA-007) regarding consultation with landowners to date. The Applicants met with Mr Bradley and his agent Mr Dennis, most recently on

Reference	Written Representation Comment	Applicants' response
	<p>and Morgan Offshore Wind Farms Development Consent Order.</p> <p>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.</p>	<p>31st March 2025 to discuss the topics raised within the relevant representation and which feature again within this written submission. The Applicants are striving to work with landowners and their agents to understand and discuss the impact the proposals have on their holdings and identify ways to mitigate impacts where practicable. In addition, negotiations are continuing on the Heads of Terms as set out in the response to REP1-123.11 below.</p>
REP1-124 124.2	<p>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.</p>	<p>The Applicants have addressed this in their relevant representation response RR-0280 280.3 (PDA-007).</p>
REP1-124 124.3	<p>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.</p>	<p>The Outline Code of Construction Practice (APP-193) is secured through Requirement 8 of Schedules 2A & 2B of the draft Development Consent Order (REP1-008). Following the grant of the DCO, the local authority and other relevant bodies will approve any design details in accordance with the parameters set out in the outline plans secured by the DCO. Requirement 8 of Schedules 2A&2B already includes the following wording that ensures the approved Code of Construction Practice will be complied with:</p>

Reference	Written Representation Comment	Applicants' response
		<p>3) The code of construction practice approved in relation to the relevant stage of the Project A onshore works and Project A intertidal works must be followed in relation to that stage of the Project A onshore works and Project A intertidal works. This same commitment applies for Project B.</p> <p>Pursuant to this Requirement 8, the approved Code of Construction Practice must accord with the outline Code of Construction Practice which has been submitted</p>
REP1-124 124.4	<p>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.</p>	<p>The Surface and groundwater management plan (APP-202) which forms part of the Outline Code of Construction Practice (APP-193) includes measures ensuring that surface water runoff and site drainage from construction is intercepted and attenuated on site, and that proposed dewatering and surface water discharges to watercourses are controlled in quality and volume to ensure there is no increase to flood risk. These measures will be agreed through the discharge of requirements with the relevant authorities through the submission of detailed Surface and Groundwater Management Plan(s). This is secured through Requirement 8 in Schedules 2A and 2B of the draft DCO (REP1-008).</p> <p>The Applicants note that within the DEFRA Construction Code of Practice for the Sustainable Use of Soils on Construction Sites (PB13298) (Defra, 2018) that stockpile heights of 3-4 m are commonly used for topsoil, but heights may need to be greater where storage space is limited.</p> <p>In addition to this, the Outline Soil Management Plan (APP-200) sets out measures to protect soil quality and structure during construction, ensuring that the land remains viable for farming in the long term. Construction activities will be undertaken in accordance with the detailed Soil Management Plan(s). Section 1.6 of the Outline Soil Management Plan (APP-200) provides detail on pre-construction surveys which will be undertaken to inform the detailed Soil Management Plans. It also includes the production of an aftercare plan for agricultural areas within the Onshore Order Limits which will be subject to agreement with the affected landowner(s). This is secured in</p>

Reference	Written Representation Comment	Applicants' response
		the DCO through Requirement 8 (Code of Construction Practice), which includes production of a Soil Management Plan in accordance with the Outline Soil Management Plan (APP-200) and Requirement 18 (Restoration of land temporarily used for construction) of the draft Development Consent Order Schedule 2A and 2B (REP1-008)
REP1-124 124.5	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 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.	The Applicants understand that Mr Bradley and Ms Rayner-Porter are concerned about the use of Plot 06-078 (REP1-004). This plot is required for temporary mitigation during construction and does not form part of the Applicants' voluntary commitment to achieve biodiversity benefit. The Applicants refer to their response to the response to relevant representation RR-0277.6 (PDA-007) which sets out the requirement for the temporary mitigation. Plot 06-078 is required for the delivery for the project as it provides essential mitigation and therefore it is appropriate and necessary for the compulsory acquisition powers sought, albeit it is the Applicants' preference to secure the rights required through the voluntary land agreements sought and so the Applicants will continue to engage with Mr Bradley in that regard.
REP1-124 124.6	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.	The Applicants note that onshore export cable corridor is partly located within the Lytham Moss Biological Heritage Site (BHS) (as shown on Figure 1.4 of Volume 3, Annex 3.1: Onshore ecology desk study technical study [APP-067]). The Applicants assessed the potential impact of disturbance and displacement from the construction of the Transmission Assets on non-breeding geese, ducks and swans and non-breeding waders (see section 4.14 of Volume 4, Chapter 4: Onshore and intertidal ornithology (APP-090). The assessment concludes that in the absence of mitigation the construction of the Transmission Assets would result in a significant adverse effect. On this basis, the Applicants have made a commitment (CoT 107 of Volume 1, Annex 5.3: Commitments Register) (APP-195) that where construction activities are undertaken along the onshore export cable corridor within areas of Functionally Linked Land (Lytham Moss Biological Heritage Site) in proximity to Higher Ballam and Lower Ballam, a mitigation area will be provided for supplementary feeding of pink-footed goose and whooper swan.

Reference	Written Representation Comment	Applicants' response
		With the implementation of this mitigation, the residual effect is reduced to minor adverse.
REP1-124 124.7	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	<p>The Applicants have provided a technical note which provides detail on the site selection of the environmental mitigation and biodiversity benefit areas (Document Reference:S_D2_13).</p> <p>The mitigation area at Lytham Moss will provide temporary seasonal foraging ground for geese, swans and waders as replacement habitat for birds displaced by proposed construction activity within areas of Functionally Linked Land (Lytham Moss Biological Heritage Site) Figure 1.4 of Volume 3, Annex 3.1: Onshore ecology desk study technical study (APP-067). The mitigation area at Lytham Moss will not adversely affect the existing nearby mitigation area (the Farmland Conservation Area).</p>
REP1-124 124.8	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	<p>The Applicants are aware of Blackpool Airport's concerns regarding the management of the temporary construction mitigation area at Lytham Moss and its ability to coexist with the Airport's existing wildlife management plan. The Applicants are committed to working with Blackpool Airport and are actively consulting with Blackpool Airport Operations Limited regarding these wildlife management measures.</p>
REP1-124 124.9	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	<p>The Applicants have addressed this in their response to the relevant representation RR-0280 208.7 (PDA-007).</p>

Reference	Written Representation Comment	Applicants' response
	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.	
REP1-124 124.10	10. We urge the Inspector to reject the application for compulsory powers for this Temporary Mitigation Area.	The Applicants are seeking temporary possession over plot 06-078 (REP1-004) which is required for the construction period. The Statement of Reasons (REP1-012), the Outline Landscape Management Plan (AS-050), and Outline Ecological Management Plan (APP-212), set out outline details of the mitigation works the Applicants consider will be necessary to meet the relevant legislative and policy requirements. This land is required to provide mitigation for potential impacts of temporary habitat loss and disturbance on geese, swans and waders during construction of the Transmission Assets. and includes the ability to provide seasonal scrapes and supplementary feeding. No permanent rights are sought over these plots and following construction they will be returned to the landowners.
REP1-124 124.11	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	As detailed within the Land Rights Tracker (REP1-065), the Applicants issued the latest populated Heads of Term on the 20 th May 2025 to Mr Bradley and Ms Rayner-Porter with a copy to their appointed agent Mr Dennis following a series of meetings with the land agent group to negotiate and update the template Heads of Term documents. The Applicant welcomes engagement on the terms issued to resolve any outstanding points of difference.

2.7 D Lund and M Fare Farming Partnership

Table 2.7: REP1-125 – D Lund and M Fare Farming Partnership

Reference	Written Representation Comment	Applicants' response
REP1-125 125.1	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.	The Applicants note this comment.
REP1-125 125.2	<p>INTRODUCTION SHP VALUERS</p> <p>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.</p> <p>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.</p> <p>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</p>	The Applicants note the submission and refers Mr Pickervance to paragraph 2.31 Site selection and assessment of alternatives (PDA-005) which explains in detail the Applicants' approach to site selection. The Applicants would d also refer Mr Pickervance to ES Volume 1, Chapter 4: Site selection and consideration of alternatives (AS-026).

Reference	Written Representation Comment	Applicants' response
REP1-125 125.3	<p><u>SUMMARY (written representation exceeds 1500 words)</u></p> <p>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</p> <p>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:</p> <p>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.</p> <p>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.</p> <p>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</p>	<p>The Applicants note the response and have responded in full to the individual points below.</p>

Reference	Written Representation Comment	Applicants' response
	<p>offering no natural landscaping. Cable routes through significant Flood Zone 3 areas.</p> <p>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.</p> <p>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.</p> <p>4.5.3.3 Due to the presence of numerous constraints within 5 km...the buffer was increased to 8 km</p> <p>Substation sites are approximately 7km from Penwortham substation which must affect the efficiency of the power transmission. The substation locations are energy inefficient. 32338380.1 3</p> <p>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</p>	

Reference	Written Representation Comment	Applicants' response
	<p>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.</p> <p>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.</p>	
REP1-125 125.4	<p>WRITTEN REPRESENTATION</p> <p>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.</p> <p>MORGAN AND MORECAMBE OFFSHORE WIND FARMS: TRANSMISSION ASSETS</p> <p>Environmental Statement Volume 1, Annex 4.3: Selection and Refinement of the Onshore Infrastructure</p> <p>4.3.1.1 Guiding Principles for Onshore Infrastructure</p> <ul style="list-style-type: none"> • 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 	<p>The Applicants provided a clarification on the site selection for the onshore substation and the choice for separate sites within ISH1_12 of the response to Hearing Actions Points (REP1-037). The Applicants would also refer to Annex 5.2 to the Applicants response to Hearing Action Points: ISH1 6, 8, 9, 19, 26 & 28 - Rev F01 (REP1-039).</p> <p>The onshore substation site selection process considered the need to identify locations for two onshore substations, one for the Morgan Offshore Wind Project and one for the Morecambe Offshore Windfarm. Fundamentally, there were no land parcels within any zone sufficiently sized to accommodate together both onshore substation platform footprints and the associated necessary mitigation. This applies whether or not the substations were located in two immediately adjacent sites or a single site. This is the reason the onshore export cable route diverges to connect to the separate onshore substations. The onshore substations have been co-located as much as possible within the same zone, which has minimised the amount of divergence between the cables than if the substations were sited entirely independently of one another.</p>

Reference	Written Representation Comment	Applicants' response
	<p>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.</p> <ul style="list-style-type: none"> • 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. <p>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.</p>	<p>ISH1_7 of the response to Hearing Actions Points (REP1-037) explains how Green Belt was considered within the site selection and consideration of alternatives process. The Applicants' response to relevant representations – introduction and thematic responses (PDA-005) also provides more information on Green Belt matters within Section 2.17.2.</p> <p>The Applicants have set out in section 6 of the Planning Statement (APP-233) the significant benefits of the Transmission Assets which, as a result of energy transmission from renewable sources, mean that even if the Transmission Assets were not considered to be Critical National Priority Infrastructure, that very special circumstances are considered to exist which outweigh any harm to Green Belt.</p> <p>The Applicants' reference to direct impacts to residential properties relates to direct 'physical' impact to residential properties and their residential curtilage. The farms identified by D Lund and M Fare Farming Partnership do not have direct impacts to residential properties – agricultural land is identified as required for the development of the Transmission Assets. There are no other private residential properties along Lower Lane and Kirkham Road and Dowbridge that have direct physical impact to the property or its residential curtilage.</p> <p>The Applicants acknowledge the potential visual impact of the onshore substations and their location within the existing landscape. Section 2.20.2 of the Applicants' response to relevant representations – introduction and thematic (PDA-005) provided detailed response in relation to the landscape and visual impacts associated with the onshore substations.</p> <p>The Applicants refer to paragraph 1.7.3.6 of the Statement of Reasons (REP1-012) which explains that the feedback received from Mr Lund and Ms Fare was a consideration in the final location of the Morgan Substation due to the impact the location of the Morgan substation would have on their holding and ability to farm in the future. The Applicants also refer to the Consultation Report (APP-170) which outlines the consultation undertaken for the Transmission Assets. The Applicants also refer to their response RR-0458</p>

Reference	Written Representation Comment	Applicants' response
		and RR-458.3 (PDA-007) which sets out the latest correspondence and meetings held with Mr Lund, Ms Fare and their appointed agent.
REP1-125 125.5	<p>4.3.1 Horlock Rules</p> <p>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.</p> <p>Local Context, Land Use and Site Planning</p> <p>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.</p> <p>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.</p> <p>The proposals should keep the visual, noise and other environmental effects to a reasonably practicable</p>	<p>The Applicants acknowledge the potential visual impact of the onshore substations and their location within the existing landscape. The Applicants' siting of the onshore substations has sought to minimise their visibility as much as possible by utilising existing screening and maximising the distance from residential areas. The site selection and consideration of alternatives process for the siting of the onshore substations is detailed within Volume 1, Chapter 4: Site Selection and Consideration of Alternatives of the Environmental Statement (AS-026).</p> <p>It is noted that although close to the 'Areas of Separation' designation contained within Fylde Local Plan to 2032, no element of the Transmission Assets would cross or affect this designation. It is further noted that the Preliminary Environmental Information Report boundary was within the Kirkham and Newton Area of Separation. Changes to the scheme design have removed the Transmission Assets Order Limits outside of this Area. As such, no additional assessment of this policy is included within this section.</p> <p>The Applicants refer to Figure 10.4 of Volume 3, Figures - Part 5 of 7 (APP-135), which demonstrates that two onshore substation sites would be located outside of the extent of 'Strategic Policy GD3: Areas of Separation', and therefore, they would not compromise the function of the gap between Kirkham and Newton.</p> <p>Landscaping mitigation at the onshore substations is set out in the Outline Landscape Management Plan (OLMP) (document reference APP-208) and supported by the Outline Design Principles (APP-209). These explain that on-site mitigation planting proposals will be implemented around the onshore substations in order to minimise their visual effect from key viewpoints/receptors and to maximise screening opportunities, while also responding to local landscape character, pattern and growing conditions. The site design will also take account of the opportunities for site won topsoil and</p>

Reference	Written Representation Comment	Applicants' response
	<p>minimum. [Horlock Rules – Section III paragraph 5] – These Horlock Rules are not honoured.</p> <p>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.</p>	<p>subsoil materials to be reused on site within landscape earthworks 'bunds'. These bunds will support the visual screening of the onshore substations while having a gradual external slope gradient that appears natural and complements the existing terrain (when looking towards the onshore substations). The Applicants note that Appendix A of the outline Landscape Management Plan (APP-208) identifies an indicative programme of landscape works setting out the programme according to relevant planting seasons and maximising opportunities for advance planting prior to construction to allow trees to mature during the construction works and in advance of completion of the onshore substations.</p> <p>The planting will be designed to include a mix of faster growing 'nurse' species and slower growing 'core' species. The core species will comprise a mix of preferred native, canopy species that will outlive the nurse species and characterise the woodland structure over the longer term. In locations where it is possible to achieve advanced planting, the landscape mitigation planting will be established as early as reasonably practicable in the construction phase</p> <p>The ES assesses potential impacts on landscape character and visual resources during construction, operation and maintenance and decommissioning with the proposed landscape mitigation outlined in the OLMP (APP208) to minimise impacts, where possible. The Applicants have provided a response to Green Belt matters in the response to 4.3.1.1.</p> <p>The Applicants have considered the application of the Horlock Rules throughout the site selection and consideration of alternatives process for the siting of the onshore infrastructure. Table 4.6 of Volume 1, Chapter 4: Site Selection and Consideration of Alternatives summarises the Horlock Rules and the Transmission Assets' approach to them: <i>Visual, noise and other environmental effects have been minimised as far as possible through the site selection process. Further mitigation for potential visual impacts is considered in Volume; Chapter 10: Landscape and Visual Resources of the ES (APP-123) with noise and vibration impacts considered in Volume 3; Chapter 8: Noise and Vibration of the ES (APP-117).</i></p>

Reference	Written Representation Comment	Applicants' response
		<p>Land use</p> <p>The Applicants refer to their response RR-0582 582.1 (PDA-007) regarding the land use assessment undertaken for the Application.</p>
REP1-125 125.6	<p>Design</p> <p>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</p> <p>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.</p>	<p>Design</p> <p>The Applicants have provided indicative design details within Section 3.15.7 of Volume 1, Chapter 3: Project Description of the ES (AS-024), including the design envelope (i.e. maximum permanent parameters) within Table 3.26. The onshore substations are also visualised in Figures 10.5.1 to 10.5.107 of Volume 3, Figures – Part 6 of 7 (APP-136).</p> <p>ISH1_22 of the Applicants' response to hearing action points (REP1-037) explained that the Applicants have adopted the Project Design Envelope (PDE) approach, also known as the Rochdale Envelope approach, as further explained in Section 3.4 of the Project Description (AS-024). This approach complies with the guidance within PINS Advice Note Nine: Rochdale Envelope. This approach provides maximum (and minimum where relevant) design parameters ensuring that the worst-case scenarios are identified and assessed in the Environmental Impact Assessment (EIA). The use of the PDE approach thus defines the clear boundaries (whilst retaining necessary project parameter flexibility) within which the final design of the Transmission Assets development must comply.</p> <p>Onshore substation footprints</p> <p>The Applicants provided a response in relation to the size of the onshore substation footprints within Annex 5.5 to the Applicants response to Hearing Action Points: ISH1_20: Comparable Onshore Substation Platform Footprints (REP1-042). The response concludes that the footprints of the Morgan and Morecambe onshore substation platform footprints are comparable to the onshore substation footprints of other nationally significant infrastructure projects for offshore wind bearing in mind that in all cases the platform size</p>

Reference	Written Representation Comment	Applicants' response
	<p>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</p> <p>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.</p> <p>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’.</p> <p>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.</p>	<p>will be influenced by the specific location of the substation and any identified constraints that it needs to accommodate.</p> <p>Table 4.6 of Volume 1, Annex 4.3: Selection and Refinement of the Onshore Infrastructure of the ES (AS-028) identifies the indicative parameters for the purposes of site selection. These parameters were identified for a point in time of the project development – specifically at the Preliminary Environmental Information Report stage – identified as Stage 3c of the site selection process. Subsequent refinements of the onshore substation search areas for the purposes of the DCO application (Stage 4c) identify that these indicative areas were amended. Section 4.6.3 of AS-028 explains the reasoning for these changes. The final maximum footprint of for the onshore substation platform, landscaping, access, drainage and attenuation is identified in Table 3.26 of Volume 1, Chapter 3: Project Description of the ES (AS-024) and includes Work No. 21A up to Dow Brook for mitigation purposes.</p> <p>Access rights</p> <p>The Applicants refer to their response RR-0458.3 regarding the inclusion of the farm track and Works No 34A40A41A.</p> <p>The Applicants note that identification of permanent accesses locations has typically targeted existing private roads or field accesses. However, there may be some locations where minor intrusive works (either ‘creation’ or ‘improvement’ which may be required in the future, e.g. in the event that an access or track requires works to make it passable (ie vegetation clearance or remedial surface works)</p> <p>Green Lane</p> <p>The measures to be implemented as part of the PRoW Management Plan seek to minimise impacts on public footpaths, bridleways and other promoted routes during construction of the Transmission Assets and provide appropriate management measures where required. These will apply to the management of the existing green lane bridleway track. The detailed Public</p>

Reference	Written Representation Comment	Applicants' response
	<p>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.</p> <p>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.</p>	<p>Rights of Way Management Plan(s), which will be developed in accordance with the outline Public Rights of Way Management Plan (AS-048), and which forms part of the detailed Code of Construction Practice(s). The detailed CoCP(s) are secured by Requirement 8 of Schedules 2A and 2B of the draft DCO (REP1-008). Detailed Public Right of Way Plan(s) will be implemented as approved by the relevant local planning authority. The ALO will be the on site point of contact to ensure farming activities continue including where there is interface with the projects, this is secured through the Outline CoCP, Requirement 8 of Schedules 2A and 2B of the draft DCO (REP1-008).</p> <p>Permanent access</p> <p>The permanent access (plots 11-130A, 12-014A, 12-016A and 12-018A REP1-004) is required for the access to the mitigation ponds within plot 12-019A. The substation access from the A583 does not link to the existing access proposed for the establishment of the works within plot 12-019A and the use of the green lane is unsuitable for the vehicles required for the creation of this work</p> <p>Mitigation alternatives</p> <p>The Applicants are aware plot 12-019A is not owned by D Lund and M Fare Farming Partnership. The Applicants discussed the requirement for the ponds and initial proposals in June 2024 with the land agent representing the executors of the late John Mason. The purpose of this pond creation area is to compensate for the permanent loss of ponds and suitable aquatic invertebrate habitat, including the existing Freshfield Farm Pond, North BHS and Freshfield Farm Pond, South BHS as a result of the construction of the Morgan onshore substation. Illustrative indicative landscape proposals for the Maximum Design Scenario of the onshore substations are shown on Figure 1.1 of the Outline Landscape Management Plan (AS-050).</p> <p>There is currently no legal requirement to provide for biodiversity net gain with applications for development consent under the Planning Act 2008 currently.</p>

Reference	Written Representation Comment	Applicants' response
		The Applicants are making a voluntary commitment to achieve an overall biodiversity benefit for areas to achieve an overall biodiversity benefit for areas of permanent habitat loss associated, however the land required for works 49A, plot 12-019A does not form part of the biodiversity benefit land.
REP1-125 125.7	<p>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.</p> <p>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.</p> <p>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</p>	<p>The Applicants are not aware that Mr Lund and Ms Fare own the land identified for the environmental mitigation or biodiversity benefit. The Applicants note that the alternative land proposed is also not within the ownership of Mr Lund and Ms Fare and is unregistered.</p> <p>The Applicants refer Mr Lund and Ms Fare to the Applicants' approach to Site Selection for the Environmental Mitigation and Biodiversity Benefit areas doc (S_D2_13). This document provides details on the site selection process and parameters for each of the environmental mitigation and biodiversity benefit areas.</p>

Reference	Written Representation Comment	Applicants' response
	<p>explained in an email that having looked it up it is to be a pond to mitigate loss of a pond.</p> <p>At a site meeting with [redacted] 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.</p>	
REP1-125 125.8	<p>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]</p> <p>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.</p>	<p>The outline Design Principles (oDP) (APP-209) sets out the considerations that will inform the detailed design of the permanent works at each of the onshore substations, including their height, layout, maximum footprint and access. The detailed design of each of the substations will be developed substantially in accordance with the oDP, as secured by Requirement 4(2) of Schedule 2A and Schedule 2B of the draft DCO (REP1-008). These details will be submitted to and approved by the relevant planning authority prior to start of construction at each of the onshore substations.</p> <p>The Applicants response to Hearing Action Points (REP1-037) ISH1_7 provides details regarding the site selection and siting of the onshore substations within Green Belt land.</p>
REP1-125 125.9	4.5.3 Stage 2c: Identification of onshore substation search areas	The Applicants have explained the rationale for the 8 km radius search area in relation to the onshore substations (as illustrated in Figure 4.2 of Volume

Reference	Written Representation Comment	Applicants' response
	<p>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.</p> <p>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.</p> <p>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.</p> <p>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</p> <p>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 ?</p>	<p>1, Annex 4.3: Refinement of the Onshore Infrastructure (AS-028)) within ISH1_10 of the Applicants' response to Hearing Actions Points (REP1-037). Within this response it is noted that extending the search area beyond 8 km would not fulfil the requirements of an efficient and economic connection. In particular this would require longer 400 kV grid connection cables which would likely result in electrical losses that would create inefficiencies within the generation transfer to the grid. If the distance was extended beyond 8 km, then electrical compensation would be required, which could include greater quantities or sizes of electrical equipment within the projects' onshore substation footprints. This would likely result in larger onshore substation footprints with potentially greater maximum height requirements.</p> <p>ISH1_12 of the Applicants' response to Hearing Actions Points (REP1-037) provides a summary of the site selection for the onshore substations within the 8 km radius search area. ISH1_7 of REP1-037 states that the four zones identified within the 8 km search area all had sections of Green Belt identified within them. Zones 1, 3 and 4 had large sections of Green Belt within them whereas, Zone 2 had a smaller section Green Belt but the BRAG process identified that this was not preferred for other reasons (i.e. lack of available land for siting). The Applicants concluded that Green Belt land could not be avoided for the site selection of the onshore substations.</p> <p>Table 4.6 of AS-026 summarises the approach to the siting of the onshore infrastructure for the Transmission Assets against the Horlock Rules. The Applicants consider a robust and comprehensive site selection and consideration of alternatives process was undertaken.</p>

Reference	Written Representation Comment	Applicants' response
	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.	
REP1-125 125.10	<p>Creation of Onshore Substations Search Zones</p> <p>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.</p> <p>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.</p> <p>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.</p>	The Applicants have provided a response to this question within REP1-125 125.4.
REP1-125 125.11	<p>Other Material Planning Matters</p> <p>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</p>	The Applicants refer to their response RR-0458 458.2. Plot 12-010A is essential for the delivery of the project and works to the Morgan onshore substation. Plot 12-010A is approximately 3,771 square meters and makes up part of the 70,000 square meters required for temporary working area for the Morgan Onshore substation.

2.8

Reference	Written Representation Comment	Applicants' response
	<p>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.</p>	

David Morris

Table 2.8: REP1-133 – David Morris

Reference	Written Representation Comment	Applicants' response
REP1-1233 133.1	<p>I object to the project on a number of reasons which include:</p> <p>1. The heads of terms which were sent on 8 November are yet to be agreed (they have been amended from the 1st version) but they are not in a format that have been accepted by my appointed Land Agent and representative. The commercial terms have yet to be agreed therefore we object.</p>	<p>The Applicants refer to their response to their response RR-529 529.2 (PDA-007). Updated Heads of Terms for the land rights sought were issued to Mr Morris on 20th May 2025, the Applicants also met with Mr Morris' land agent on 29th May 2025 to discuss the terms and outstanding points of difference. The Applicants are hopeful that over the coming weeks, the Applicants can discuss site specific concerns including access and management of surface water.</p>
REP1-133 133.2	<p>2. The location and position of the proposed project will have huge negative affect on my land. The cable corridors</p>	<p>The Applicants refer to their response to their response RR-529 529.3 (PDA-007) regarding the impact on land.</p>

Reference	Written Representation Comment	Applicants' response
	go through productive grade 2 arable and grassland. The land is highly productive and used to sustain our tenants large scale farming business of Dairy and beef production, the grass is used for silage and grazing but the land is also vital to their slurry management system. The land is this area is low lying and close to sea level, therefore closely affected by surface water and the drainage system is vital – any interruption to the main drains in the area will cause significant flooding to the whole area.	
REP1-133 133.3	3. I object to the plans submitted as the operation accesses proposed run separately from Pegs lane across unaffected fields and land, this impacts day to day farm management and creates potential health and safety issues with livestock present, it also weakens the security of the land which I regard very highly. The operational access can all be gained direct from Pegs Lane where is crosses the road without recourse of affecting more land	The Applicants refer to their response to their response RR-529 529.4 (PDA-007) regarding the operational access.
REP1-133 133.4	4. I object to the project on the location of the cable route and easement. My land would be sterilised by the cable easement, preventing any alternative use of the land.	The Applicants refer to their response to their response RR-529 529.5 (PDA-007) referring to sterilisation of land.
REP1-133 133.5	5. The land has a number of important ditches and drains and no open cut trenching must be used as these cannot be disturbed	The Applicants refer to their response to their response RR-529 529.6 (PDA-007) on the impact of drains and ditches.
REP1-133 133.6	6. There are various documents that we object to due to the lack of information provided for this specific area – these are just standard documents that do not address the conditions of this specific location and area which include a) APP-193 (J1) Code of Construction Practice b) APP-203 J1.10 Outline Construction Plan We object to the Outline Construction Fencing, there is not the full details of all fencing, the materials and detailed	The Applicants refer to their response to their response RR-529 529.7 (PDA-007) on the documents listed within the written representation.

Reference	Written Representation Comment	Applicants' response
	<p>specification is required at this stage. The wording relating to the fencing of the working width is inadequate to cover full security and to minimise affected parties to include fencing of crossing points.</p> <p>c) APP-202 J1.9 Surface and Groundwater Management Plan</p> <p>We object to the proposals and measures to control water run-off from the working width. No discharge of any water from the working width should be released on any adjoining land. Full detailed drainage matters need to be addressed.</p> <p>d) APP-200 J.1.7 Outline Soil Management Plan</p> <p>We object to the submission of the Outline Soil Management Plan which formed part of the outline Code of Construction Practice (CoCP). The Outline Soil Management Plan which has been submitted on behalf of the Project is not specific to the area and the route between Penwortham and Blackpool. It is not site specific and does not deal with the variants of the soil structures within the proposed route. We object to the responsibility of the implementation of the Soil Management Plan being delivered by the principal contractor and the Agricultural Liaison Officer (ALO). This must be underpinned by the Project. Section 1.7.2 Soil Stripping – it identifies that it will be recorded by the ALO prior to commencement of any construction. This does not deal with any point of discussion or input by the affected parties such as myself and essential information that has been suggested does not fully complete the evidence of the soil quality</p>	
REP1-133 133.7	7. I have serious concerns with regard to the project, There is no certainty offered by either Morgan or Morecambe that	The Applicants refer to agenda item D of The Applicants' Hearing Summary of the Issue Specific Hearing 1: Day 2 (REP1-035) and S_D1_5.2 Annex 5.2

Reference	Written Representation Comment	Applicants' response
	they will develop the project, simultaneously if granted, therefore if the SOS allow this then construction of this project could last in excess of 7 years which is just not acceptable or via for my business. Timing and controls have to be issued by the SoS	to the Applicants response to Hearing Action Points: ISH1 6, 8, 9, 19, 26 & 28 - Rev F01 (REP1-039) which explains in detail why Morgan and Morecambe cannot commit to simultaneous construction. The Applicants will continue to engage with Mr Morris and his appointed land agent on the potential disruption to the farm business to ensure mitigation measures can be implemented where possible. As outlined within the Outline CoCP (APP-193), an Agricultural Liaison Officer (ALO) will be appointed in time for the commencement of pre-construction activities and will be the dedicated point of contact for ongoing engagement about practical matters with landowners, occupiers and their agents during the pre-construction and construction phases.
REP1-133 133.8	8. The operational accesses as shown are unnecessary, I have had no input into this and object strongly, it creates a health and safety issue and impacts on the security of my land, they can achieve direct access off Pegs Lane the cable easement route without affecting additional land.	Operational accesses to the onshore export cable route are required to ensure the continued operation and maintenance of the assets. As set out in RR-529.4 (PDA-007) the Applicants have sought to utilise an existing field gateway and it is not envisaged the use of this existing access would have an impact on day to day farm management or create any additional health and safety issues. Section 3.18 4 of Volume 1, Chapter 3: Project Description (AS-024), explains that, similar to the operation and maintenance of the onshore export and 400kV grid connection cables, management of the mitigation ponds is expected to be minimal and any ongoing monitoring would comprise a small number of visits a year. Within the voluntary agreements, the Applicants expect to incorporate suitable notice provisions regarding the use of operational access where required.
REP1-133 133.9	9. We wish to be present or our land agent present at the walk over inspection Therefore, until all these queries and have been fully answered and dealt with appropriately for our land, we object to the scheme/project.	The Applicants note the request.

2.9 Geoffrey Fenton

Table 2.9: REP1-142 – Geoffrey Fenton

Reference	Written Representation Comment	Applicants' response
REP1-142 142.1	I object to the project on a number of reasons which include: 1. The heads of terms which were sent on 8 November are yet to be agreed. They are not in a format that have been accepted by my appointed Land Agent and representative. The commercial terms have yet to be agreed therefore we object.	The Applicants refer to their response RR-1566 1566.1 (PDA-007). Updated heads of terms for the land rights sought were issued to Mr Fenton on the 20 th May 2025, the Applicants also met with Mr Fentons' land agent on the 29 th May 2025 to discuss the terms and outstanding points of difference. The Applicants are hopeful that through the ongoing negotiations, any outstanding points of difference regarding the impact on the diary holding can be resolved through the voluntary negotiations.
REP1-142 142.2	2. The location and position of the proposed project will have huge negative affect on my farming business – we are an intensive dairy farm and rely heavily of grass production to feed the high yielding cows and the land is vital for slurry management, the project goes straight through the farm which means we lose the working area but also renders the land to the south unusable due to lack of access. The location of the cables and easement is too close to my buildings and prevents any future expansion of the farm.	The Applicants refer to their response to RR-1566 1566.2 (PDA-007) on the impact on the farm business.
REP1-142 142.3	3. We object to the plans submitted and the operation accesses as proposed on my land as these impact day to day farm management and create potential health and safety issues with livestock present. The operation access can all be gained from Wrea Brook Lane which is a public adopted highway.	The Applicants refer to their response to RR-1566 1566.3 (PDA-007) regarding the operational access proposed. .
REP1-142 142.4	4. There are various documents that we object to due to the lack of information provided for this specific area – these are just standard documents that do not address the	The Applicants refer to their response to RR-1566 1566.4, 1566.5 and 1566.6 (PDA-007) in relation to the outline management documents submitted with the application.

Reference	Written Representation Comment	Applicants' response
	<p>conditions of this specific location and area which include</p> <p>a) APP-193 (J1) Code of Construction Practice</p> <p>b) APP-203 J1.10 Outline Construction Plan</p> <p>We object to the Outline Construction Fencing, there is not the full details of all fencing, the materials and detailed specification is required at this stage. The wording relating to the fencing of the working width is inadequate to cover full security and to minimise affected parties to include fencing of crossing points.</p> <p>c) APP-202 J1.9 Surface and Groundwater Management Plan</p> <p>We object to the proposals and measures to control water run-off from the working width. No discharge of any water from the working width should be released on any adjoining land. Full detailed drainage matters need to be addressed.</p> <p>d) APP-200 J.1.7 Outline Soil Management Plan</p> <p>We object to the submission of the Outline Soil Management Plan which formed part of the outline Code of Construction Practice (CoCP). The Outline Soil Management Plan which has been submitted on behalf of the Project is not specific to the area and the route between Penwortham and Blackpool. It is not site specific and does not deal with the variants of the soil structures within the proposed route. We object to the responsibility of the implementation of the Soil Management Plan being delivered by the principal contractor and the Agricultural Liaison Officer (ALO). This must be underpinned by the Project. Section 1.7.2 Soil Stripping – it identifies that it will be recorded by the ALO prior to commencement of any construction. This does not deal with any point of discussion or input by the affected parties such as myself</p>	

Reference	Written Representation Comment	Applicants' response
	and essential information that has been suggested does not fully complete the evidence of the soil quality.	
REP1-142 142.5	5. The operational Accesses that have been issued on the drawing have been done without any engagement and consideration, they have an additional detrimental affect and impact the overall security of the farm given the position and extent. Access can be gained directly from Wrea Brook Lane without any additional rights north of the proposed route.	<p>The Applicants have sought to utilise existing field entrances and access points wherever possible for operational accesses to the cable corridor to minimise disruption to farm holdings. Through the voluntary land agreements the Applicants would expect to incorporate a suitable notice provision regarding the use of the operational access.</p> <p>Section 3.18 4 of Volume 1, Chapter 3: Project Description (AS-024), explains that, similar to the operation and maintenance of the onshore export and 400kV grid connection cables, management of the mitigation ponds is expected to be minimal and any ongoing monitoring would comprise a small number of visits a year.</p> <p>The Applicants refer to their response to their response above REP1-142.3.</p>
REP1-142 142.6	6. We have serious concerns with regard to the project. Overall, there is no certainty offered by either Morgan or Morecambe that the project will a line in timings and develop the project together if consented. Therefore the construction of this overall project could be over 7 years which not be sustainable for our business and effectively ruin our farming business, timing and controls have to be issued by the SoS.	The Applicants refer to their response to RR-1566 1566.7 (PDA-007) regarding the timing of the works.
REP1-142 142.7	7. We wish to be present or our land agent present at the walk over inspection Therefore, until all these queries and have been fully answered and dealt with appropriately for our land, we object to the scheme/project	The Applicants note the request.

2.10 George Rhodes

Table 2.10: REP1-143 – George Rhodes

Reference	Written Representation Comment	Applicants' response
REP1-143 143.1	I object to the project on a number of reasons which include: 1. The heads of terms which were sent on 8 November are yet to be agreed. They are not in a format that have been accepted by my appointed Land Agent and representative. The commercial terms have yet to be agreed therefore we object.	The Applicants refer to their response to their response RR-744.2 (PDA-007). Updated Heads of Term for the land rights sought were issued to Mr Rhodes on 20 th May 2025, the Applicants also met with Mr Rhodes' land agent on 29 th May 2025 to discuss the terms and outstanding points of difference. The Applicants are hopeful that through the ongoing negotiations the outstanding points of difference in relation to access can be agreed through the voluntary agreement.
REP1-143 143.2	2. The location and position of the proposed project and more specifically the access track to the substation and cable route will have huge negative affect on our retained land, the cable route cuts straight through the land holding, we only have a limited amount of land to accommodate our livestock and for the production of Haylage for our livestock and our haylage business and any loss of the land will have a huge negative impact on our property and business. The land is closely affected by surface water and the drainage system is vital – any interruption to the main drains in the area will cause significant flooding to the whole area.	The Applicants refer to their response RR-744.3 and RR-744.4 (PDA-007) which refers to the impact on the holding.
REP1-143 143.3	3. I object to the project as some of my Land would be sterilised and substantially affect the privacy and value of the remainder by way of the proximity to the substation, preventing any alternative use of the land.	The Applicants refer to their response RR-744.5 (PDA-007) regarding the sterilisation of land.
REP1-143 143.4	4. There are various documents that we object to due to the lack of information provided for this specific area – these are just standard documents that do not address the conditions of this specific location and area which include	The Applicants refer to their response RR-744.6(PDA-007) which refers to the outline management plans submitted with the application.

Reference	Written Representation Comment	Applicants' response
	<p>a) APP-193 (J1) Code of Construction Practice</p> <p>b) APP-203 J1.10 Outline Construction Plan</p> <p>We object to the Outline Construction Fencing, there is not the full details of all fencing, the materials and detailed specification is required at this stage. The wording relating to the fencing of the working width is inadequate to cover full security and to minimise affected parties to include fencing of crossing points.</p> <p>c) APP-202 J1.9 Surface and Groundwater Management Plan we object to the proposals and measures to control water run-off from the working width. No discharge of any water from the working width should be released on any adjoining land. Full detailed drainage matters need to be addressed.</p> <p>d) APP-200 J.1.7 Outline Soil Management Plan</p> <p>We object to the submission of the Outline Soil Management Plan which formed part of the outline Code of Construction Practice (CoCP). The Outline Soil Management Plan which has been submitted on behalf of the Project is not specific to the area and the route between Penwortham and Blackpool. It is not site specific and does not deal with the variants of the soil structures within the proposed route. We object to the responsibility of the implementation of the Soil Management Plan being delivered by the principal contractor and the Agricultural Liaison Officer (ALO). This must be underpinned by the Project. Section 1.7.2 Soil Stripping – it identifies that it will be recorded by the ALO prior to commencement of any construction. This does not deal with any point of discussion or input by the affected parties such as myself and essential information that has been suggested does not fully complete the evidence of the soil quality.</p>	

Reference	Written Representation Comment	Applicants' response
REP1-143 143.5	5. I have serious concerns with regard to the project, There is no certainty offered by either Morgan or Morecambe that they will develop the project, simultaneously if granted, therefore if the SOS allow this then construction of this project could last in excess of 7 years which is just not acceptable or via for my business. Timing and controls have to be issued by the SoS	<p>The Applicants refer to agenda item D of The Applicants' Hearing Summary of the Issue Specific Hearing 1: Day 2 (REP1-035) and S_D1_5.2 Annex 5.2 to the Applicants response to Hearing Action Points: ISH1 6, 8, 9, 19, 26 & 28 - Rev F01 (REP1-039) which sets out the co-ordination between Morecambe and Morgan and why it is not possible to commit to simultaneous construction taking place. The Applicants will continue to engage with Mr Rhodes and his appointed land agent on the potential disruption to the farm business to ensure mitigation measures can be implemented where possible.</p> <p>As outlined within the Outline CoCP (APP-193), an Agricultural Liaison Officer (ALO) will be appointed in time for the commencement of pre-construction activities and will be the dedicated point of contact for ongoing engagement about practical matters with landowners, occupiers and their agents during the pre-construction and construction phases.</p>
REP1-143 143.6	<p>6. The operational accesses as shown are unnecessary, I have had no input into this and object strongly, it creates a health and safety issue and impacts on the security of my land, they can achieve direct access along the sterilised cable route without affecting additional land.</p> <p>Therefore, until all these queries and have been fully answered and dealt with appropriately for our land, I object to the scheme/project</p>	<p>The Applicants have sought to use existing field entrances and access points for operational accesses where possible and understand that the access proposed forms part of the field which is affected by the 400kv cable corridor rather than affecting additional land.</p> <p>Section 3.18 4 of Volume 1, Chapter 3: Project Description (AS-024), explains the access requirements for operations and maintenance of the onshore export cables would comprise a small number of visits a year and would typically be completed using a Light Goods Vehicle or other 4x4 or multi-terrain vehicle. Activities are therefore expected to be minimal and as such the Applicants do not envisage this will have an impact on day to day farm management or create any additional health and safety issues.</p> <p>Through the voluntary land agreements, the Applicants would expect to incorporate a suitable notice provision regarding the use of the operational access.</p>

2.11 George Rigby Mason and Alice Margaret Mason

Table 2.11: REP1-144 – George Rigby Mason and Alice Margaret Mason

Reference	Written Representation Comment	Applicants' response
REP1-144 144.1	<p>We object to the project on a number of reasons which include:</p> <p>1. The heads of terms which were sent on 8 November are yet to be agreed. They are not in a format that have been accepted by my appointed Land Agent and representative. The commercial terms have yet to be agreed therefore we object.</p>	<p>The Applicants refer to their response to their response RR-54.1 (PDA-007). Updated Heads of Term for the land rights sought were issued to Mr and Ms Mason on 20th May 2025, the Applicants also met with Mr and Ms Masons' land agent on 29th May 2025 to discuss the terms and outstanding points of difference. The Applicants are hopeful that through the ongoing negotiations the outstanding points of difference can be resolve</p>
REP1-144 144.2	<p>2. The location and position of the proposed project will have huge negative affect on our land. The cable corridors go through our farm including productive arable and grassland. The land is highly productive and used to sustain our tenants large scale farming business of Dairy and beef production, the grass is used for silage and grazing but the land is also vital to their slurry management system.</p> <p>3. The route cuts the farm in half and has a huge detrimental affect on the farming business, impacting the ability to continue dairy farming as the cattle use the proposed working area for grazing and milk production. The land is closely affected by surface water and the drainage system is vital – any interruption to the main drains in the area will cause significant flooding to the whole area.</p>	<p>The Applicants refer to their response to RR-54.2 (PDA-007) which considers the impact on the Mason's land.</p>
REP1-144 144.3	<p>4. We object to the plans submitted as the operation accesses proposed run separately across unaffected fields and uses the farm's private track, this impacts day to day farm management and creates potential health and safety issues with livestock present, it also weakens the security</p>	<p>The Applicants refer to their response to RR-54.5 (PDA-007) on the operational access.</p>

Reference	Written Representation Comment	Applicants' response
	of the land and farm which we regard very highly. The operational access can all be gained direct from Hillock Lane where it crosses the road without recourse of affecting more of our land	
REP1-144 144.4	5. We object to the project on the location of the cable route and easement. My land would be sterilised by the cable easement, preventing any alternative use of the land	The Applicants refer to their response to RR-54.6 (PDA-007) regarding the sterilisation of land.
REP1-144 144.5	6. The land has a number of important ditches and drains and no open cut trenching must be used as these cannot be disturbed	The Applicants refer to their response to RR-54.7 (PDA-007) on the comments made about ditches and drains.
REP1-144 144.6	<p>7. There are various documents that we object to due to the lack of information provided for this specific area – these are just standard documents that do not address the conditions of this specific location and area which include</p> <p>a) APP-193 (J1) Code of Construction Practice</p> <p>b) APP-203 J1.10 Outline Construction Plan</p> <p>We object to the Outline Construction Fencing, there is not the full details of all fencing, the materials and detailed specification is required at this stage. The wording relating to the fencing of the working width is inadequate to cover full security and to minimise affected parties to include fencing of crossing points.</p> <p>c) APP-202 J1.9 Surface and Groundwater Management Plan</p> <p>We object to the proposals and measures to control water run-off from the working width. No discharge of any water from the working width should be released on any adjoining land. Full detailed drainage matters need to be addressed.</p> <p>d) APP-200 J.1.7 Outline Soil Management Plan</p>	The Applicants refer to their response to RR-54.8, 54.9 and 54.10 (PDA-007) on the outline management plans submitted with the application.

Reference	Written Representation Comment	Applicants' response
	We object to the submission of the Outline Soil Management Plan which formed part of the outline Code of Construction Practice (CoCP). The Outline Soil Management Plan which has been submitted on behalf of the Project is not specific to the area and the route between Penwortham and Blackpool. It is not site specific and does not deal with the variants of the soil structures within the proposed route. We object to the responsibility of the implementation of the Soil Management Plan being delivered by the principal contractor and the Agricultural Liaison Officer (ALO). This must be underpinned by the Project. Section 1.7.2 Soil Stripping – it identifies that it will be recorded by the ALO prior to commencement of any construction. This does not deal with any point of discussion or input by the affected parties such as myself and essential information that has been suggested does not fully complete the evidence of the soil quality	
REP1-144 144.7	8. I have serious concerns with regard to the project, There is no certainty offered by either Morgan or Morecambe that they will develop the project, simultaneously if granted, therefore if the SOS allow this then construction of this project could last in excess of 7 years which is just not acceptable or via for my business. Timing and controls have to be issued by the SoS	The Applicants refer to their response to RR-54.11 (PDA-007) on the construction scenarios.
REP1-144 144.8	9. The operational access as shown from Hillock lane is unnecessary, I have had no input into this and object strongly, it creates a health and safety issue and impacts on the security of my land.	The Applicants have sought to use existing field entrances and access points for operational accesses where possible. Section 3.18 4 of Volume 1, Chapter 3: Project Description (AS-024), explains that the operation and maintenance of the onshore export cables would comprise a small number of visits a year and would typically be completed using a Light Goods Vehicle or other 4x4 or multi-terrain vehicle. Activities are therefore expected to be minimal and as such the Applicants do not envisage this will have an impact on day to day farm management or create any additional health and safety issues.

Reference	Written Representation Comment	Applicants' response
		Through the voluntary land agreements the Applicants would expect to incorporate a suitable notice provision regarding the use of the operational access.
REP1-144 144.9	10. We wish to be present or our land agent present at the walk over inspection Therefore, until all these queries and have been fully answered and dealt with appropriately for our land, we object to the scheme/project	The Applicants note the request.

2.12 Hornbies Foundation Charity

Table 2.12: REP1-153 – Hornbies Foundation Charity

Reference	Written Representation Comment	Applicants' response
REP1-153 153.1	<p>Important written representations on behalf of a landowner affected by two proposed substations and associated cable routes within their farm property</p> <p>INTRODUCTION SHP VALUERS</p> <p>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</p>	The Applicants note the submission and refers Mr Pickervance to paragraph 2.31 Site selection and assessment of alternatives (PDA-005) which explains in detail the Applicants' approach to site selection.

Reference	Written Representation Comment	Applicants' response
	extending to circa 200 acres and includes two farmhouses and farm buildings which will be permanently severed.	
REP1-153 153.2	<p>SUMMARY</p> <p>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.</p> <p>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;</p>	The Applicants note the response and have responded in full to the individual points below.

Reference	Written Representation Comment	Applicants' response
	<p>Environmental Statement Volume 1, Annex 4.3:</p> <p>4.3.1.1 Guiding Principles for Onshore Infrastructure • Substations should be sited in proximity to each otherCreation 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.</p> <p>These two proposed new substation sites are not aligned along the transmission route.</p> <p>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.</p> <p>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</p> <p>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</p>	

Reference	Written Representation Comment	Applicants' response
	<p>milking cows across a single proposed crossing point to navigate proposed permanent SI Works 23B from Lower Lane to Morecambe Substation.</p> <p>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.</p> <p>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.</p> <p>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.</p>	
REP1-153 153.3	<p>WRITTEN REPRESENTATION</p> <p>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.</p> <p>MORGAN AND MORECAMBE OFFSHORE WIND FARMS: TRANSMISSION ASSETS</p>	<p>The Applicants provided a clarification on the site selection for the onshore substation and the choice for separate sites within ISH1_12 of the response to Hearing Actions Points (REP1-037).</p> <p>The onshore substation site selection process considered the need to identify locations for two onshore substations, one for the Morgan Offshore Wind Project and one for the Morecambe Offshore Windfarm. Fundamentally,</p>

Reference	Written Representation Comment	Applicants' response
	<p>Environmental Statement Volume 1, Annex 4.3: Selection and Refinement of the Onshore Infrastructure</p> <p>4.3.1.1 Guiding Principles for Onshore Infrastructure</p> <ul style="list-style-type: none"> 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. <p>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</p>	<p>there were no land parcels within any zone sufficiently sized to accommodate together both onshore substation platform footprints and the associated necessary mitigation. This applies whether or not the substations were located in two immediately adjacent sites or a single site. This is the reason the onshore export cable route diverges to connect to the separate onshore substations.</p> <p>ISH1_7 of the response to Hearing Actions Points (REP1-037) explains how Green Belt was considered within the site selection and consideration of alternatives process. The Applicants' response to relevant representations – introduction and thematic responses (PDA-005) also provides more information on Green Belt matters within Section 2.17.2</p> <p>The Applicants have set out in section 6 of the Planning Statement (APP-233) the significant benefits of the Transmission Assets which, as a result of energy transmission from renewable sources, mean that even if the Transmission Assets were not considered to be Critical National Priority Infrastructure, that very special circumstances are considered to exist which outweigh any harm to Green Belt.</p> <p>The Applicants' reference to direct impacts to residential properties relates to direct 'physical' impact to residential properties and their residential curtilage. The farms identified by being Lower House Farmhouse, Greenbank Farmhouse, Freshfield Farmhouse and Marybank Farmhouse do not have direct impacts to residential properties – agricultural land is identified as required for the development of the Transmission Assets. There are no other private residential properties along Lower Lane and Kirkham Road and Dowbridge that have direct physical impact to the property or its residential curtilage.</p> <p>The Applicants acknowledge the potential visual impact of the onshore substations and their location within the existing landscape. Section 2.20.2 of the Applicants' response to relevant representations – introduction and thematic (PDA-005) provided detailed response in relation to the landscape and visual impacts associated with the onshore substations.</p>

Reference	Written Representation Comment	Applicants' response
	infrastructure options until after the Transmission Assets onshore infrastructure options had been decided upon by the Projects.	The Applicants refer to CAH1_5 (REP1-037) of the Applicants Hearing Action Points that sets out the consultation undertaken with the Hornbies Trust regarding feedback on the substation location and the most recent engagement. The Applicants also refer to the Consultation Report (APP-170) which outlines the consultation undertaken for the Transmission Assets.
REP1-153 153.5	<p>4.3.1 Horlock Rules</p> <p>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.</p> <p>- Local Context, Land Use and Site Planning</p> <p>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.</p> <p>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.</p>	<p>The Applicants acknowledge the potential visual impact of the onshore substations and their location within the existing landscape. The Applicants' siting of the onshore substations has sought to minimise their visibility as much as possible by utilising existing screening and maximising the distance from residential areas. The site selection and consideration of alternatives process for the siting of the onshore substations is detailed within Volume 1, Chapter 4: Site Selection and Consideration of Alternatives of the Environmental Statement (AS-026).</p> <p>Landscaping mitigation at the onshore substations is set out in the Outline Landscape Management Plan (OLMP) (document reference APP-208) and supported by the Outline Design Principles (APP-209). These explain that on-site mitigation planting proposals will be implemented around the onshore substations in order to minimise their visual effect from key viewpoints/receptors and to maximise screening opportunities, while also responding to local landscape character, pattern and growing conditions. The site design will also take account of the opportunities for site won topsoil and subsoil materials to be reused on site within landscape earthworks 'bunds'. These bunds will support the visual screening of the onshore substations while having a gradual external slope gradient that appears natural and complements the existing terrain (when looking towards the onshore substations). The Applicants note that Appendix A of the outline Landscape Management Plan (APP-208) identifies an indicative programme of landscape works setting out the programme according to relevant planting seasons and maximising opportunities for advance planting prior to construction to allow trees to mature during the construction works and in advance of completion of the onshore substations.</p>

Reference	Written Representation Comment	Applicants' response
	<p>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</p> <p>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.</p>	<p>The planting will be designed to include a mix of faster growing 'nurse' species and slower growing 'core' species. The core species will comprise a mix of preferred native, canopy species that will outlive the nurse species and characterise the woodland structure over the longer term. In locations where it is possible to achieve advanced planting, the landscape mitigation planting will be established as early as reasonably practicable in the construction phase.</p> <p>The ES assesses potential impacts on landscape character and visual resources during construction, operation and maintenance and decommissioning with the proposed landscape mitigation outlined in the OLMP (APP208) to minimise impacts, where possible. The Applicants have provided a response to Green Belt matters in the response to 4.3.1.1.</p> <p>The Applicants have considered the application of the Horlock Rules throughout the site selection and consideration of alternatives process for the siting of the onshore infrastructure. Table 4.6 of Volume 1, Chapter 4: Site Selection and Consideration of Alternatives summarises the Horlock Rules and the Transmission Assets' approach to them: <i>Visual, noise and other environmental effects have been minimised as far as possible through the site selection process. Further mitigation for potential visual impacts is considered in Volume; Chapter 10: Landscape and Visual Resources of the ES (APP-123) with noise and vibration impacts considered in Volume 3; Chapter 8: Noise and Vibration of the ES (APP-117).</i></p> <p>Land use</p> <p>The Applicants refer to their response RR-840.3 (PDA-007) regarding the land use assessment undertaken for the Application. The Applicants will have ongoing engagement with occupiers of the land during the pre-construction and construction phases through the appointment of an agricultural liaison officer (ALO) as set out in the Outline Code of Construction Management Plan (APP-193) secured through the Requirement 8 of Schedules 2A & 2B draft Development Consent Order (REP1-008), the scope of works for the ALO will include agreeing accommodation works and ongoing engagement</p>

Reference	Written Representation Comment	Applicants' response
		about practical matters such as the movement of cattle to ensure disruption to farming enterprises is minimised where possible. This will include consideration of fencing arrangements with respect to access tracks.
REP1-153 153.6	<p>Design</p> <p>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.</p> <p>[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</p> <p>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 farmsteadings 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.</p>	<p>Design</p> <p>The Applicants have provided indicative design details within Section 3.15.7 of Volume 1, Chapter 3: Project Description of the ES (AS-024), including the design envelope (i.e. maximum permanent parameters) within Table 3.26. The onshore substations are also visualised in Figures 10.5.1 to 10.5.107 of Volume 3, Figures – Part 6 of 7 (APP-136).</p> <p>ISH1_22 of the Applicants' response to hearing action points (REP1-037) explained that the Applicants have adopted the Project Design Envelope (PDE) approach, also known as the Rochdale Envelope approach, as further explained in Section 3.4 of the Project Description (AS-024). This approach complies with the guidance within PINS Advice Note Nine: Rochdale Envelope. This approach provides maximum (and minimum where relevant) design parameters ensuring that the worst-case scenarios are identified and assessed in the Environmental Impact Assessment (EIA). The use of the PDE approach thus defines the clear boundaries (whilst retaining necessary project parameter flexibility) within which the final design of the Transmission Assets development must comply.</p> <p>Onshore substation footprints</p> <p>The Applicants provided a response in relation to the size of the onshore substation footprints within Annex 5.5 to the Applicants response to Hearing Action Points: ISH1_20: Comparable Onshore Substation Platform Footprints (REP1-042). The response concludes that the footprints of the Morgan and Morecambe onshore substation platform footprints are comparable to the onshore substation footprints of other nationally significant infrastructure projects for offshore wind bearing in mind that in all cases the platform size will be influenced by the specific location of the substation and any identified constraints that it needs to accommodate.</p>

Reference	Written Representation Comment	Applicants' response
	<p>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.</p> <p>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)</p> <p>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.</p>	<p>Table 4.6 of Volume 1, Annex 4.3: Selection and Refinement of the Onshore Infrastructure of the ES (AS-028) identifies the indicative parameters for the purposes of site selection. These parameters were identified for a point in time of the project development – specifically at the Preliminary Environmental Information Report stage – identified as Stage 3c of the site selection process. Subsequent refinements of the onshore substation search areas for the purposes of the DCO application (Stage 4c) identify that these indicative areas were amended. Section 4.6.3 of AS-028 explains the reasoning for these changes. The final maximum footprint of for the onshore substation platform, landscaping, access, drainage and attenuation is identified in Table 3.26 of Volume 1, Chapter 3: Project Description of the ES (AS-024) and includes Work No. 21A up to Dow Brook for mitigation purposes.</p> <p>Green Lane</p> <p>The measures to be implemented as part of the PRoW Management Plan seek to minimise impacts on public footpaths, bridleways and other promoted routes during construction of the Transmission Assets and provide appropriate management measures where required. These will apply to the management of the existing green lane bridleway track. The detailed Public Rights of Way Management Plan(s), which will be developed in accordance with the outline Public Rights of Way Management Plan (AS-048), and which forms part of the detailed Code of Construction Practice(s). The detailed CoCP(s) are secured by Requirement 8 of Schedules 2A and 2B of the draft DCO (AS-004). Detailed Public Right of Way Plan(s) will be implemented as approved by the relevant local planning authority. The ALO will be the on site point of contact to ensure farming activities continue including where there is interface with the projects, this is secured through the Outline CoCP, Requirement 8 of Schedules 2A and 2B of the draft DCO (AS-004).</p>

Reference	Written Representation Comment	Applicants' response
REP1-153 153.7	<p>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.</p> <p>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.</p>	<p>The Applicants refer Hornbies Foundation Charity to the Applicants' approach to Site Selection for the Environmental Mitigation and Biodiversity Benefit areas doc (S-D2_13). This document provides details on the site selection process and parameters for each of the environmental mitigation and biodiversity benefit areas. The Applicants also refer to hearing action point CAH1_5 (REP1-037) setting out the consultation undertaken.</p>
	<p>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.</p> <p>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.</p>	<p>The outline Design Principles (oDP) (APP-209) sets out the considerations that will inform the detailed design of the permanent works at each of the onshore substations, including their height, layout, maximum footprint and access. The detailed design of each of the substations will be developed substantially in accordance with the oDP, as secured by Requirement 4(2) of Schedule 2A and Schedule 2B of the draft DCO (AS-004). These details will be submitted to and approved by the relevant planning authority prior to start of construction at each of the onshore substations.</p> <p>The Applicants response to Hearing Action Points (REP1-037) ISH1_7 provides details regarding the site selection and siting of the onshore substations within Green Belt land.</p>

Reference	Written Representation Comment	Applicants' response
REP1-153 153.8	<p>4.5.3 Stage 2c: Identification of onshore substation search areas</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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</p> <p>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 ?</p>	<p>The Applicants have explained the rationale for the 8 km radius search area in relation to the onshore substations (as illustrated in Figure 4.2 of Volume 1, Annex 4.3: Refinement of the Onshore Infrastructure (AS-028)) within ISH1_10 of the Applicants' response to Hearing Actions Points (REP1-037). Within this response it is noted that extending the search area beyond 8 km would not fulfil the requirements of an efficient and economic connection. In particular this would require longer 400 kV grid connection cables which would likely result in electrical losses that would create inefficiencies within the generation transfer to the grid. If the distance was extended beyond 8 km, then electrical compensation would be required, which could include greater quantities or sizes of electrical equipment within the projects' onshore substation footprints. This would likely result in larger onshore substation footprints with potentially greater maximum height requirements.</p> <p>ISH1_12 of the Applicants' response to Hearing Actions Points (REP1-037) provides a summary of the site selection for the onshore substations within the 8 km radius search area. ISH1_7 of REP1-037 states that the four zones identified within the 8 km search area all had sections of Green Belt identified within them. Zones 1, 3 and 4 had large sections of Green Belt within them whereas, Zone 2 had a smaller section Green Belt but the BRAG process identified that this was not preferred for other reasons (i.e. lack of available land for siting). The Applicants concluded that Green Belt land could not be avoided for the site selection of the onshore substations.</p> <p>Table 4.6 of AS-026 summarises the approach to the siting of the onshore infrastructure for the Transmission Assets in the context of the Horlock Rules. The Applicants consider a robust and comprehensive site selection and consideration of alternatives process was undertaken.</p>

Reference	Written Representation Comment	Applicants' response
	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.	
REP1-153 153.10	<p>Creation of Onshore Substations Search Zones</p> <p>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.</p> <p>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.</p> <p>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.</p>	<p>The Applicants have provided a response to this question within REP1-125 125.4.</p> <p>The centreline approach has not been continued here due to the location at which the 400kv cables are coming out of each of the substations. The cables rejoin to an aligned corridor as soon as practicably possible after the individual project substations.</p>

2.13 J W Kirkham & Sons Ltd

Table 2.13: REP1-156 – J W Kirkham & Sons Ltd

Reference	Written Representation Comment	Applicants' response
REP1-156 156.1	As Agents we wish to lodge objections on behalf of the above party in respect of the proposed Morecambe and Morgan Offshore Wind Farms Development Consent Order. The above party benefit from an easement for a Water pipe serving their Caravan site which crosses Plots No. 1. There has been a lack of consultation on the Scheme to Landowners & Occupiers with limited discussions regarding access, cable routes, access, drainage, land restoration, surface apparatus etc.	The Applicants refer to their response to the relevant representation RR-0874.2 (PDA-007) regarding consultation with landowners to date.
REP1-156 156.2	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 all feedback from the consultation could not have been considered.	The Applicants have addressed these comments in their relevant representation response RR-0874.3 (PDA-007) in relation to the consultation undertaken.
REP1-156 156.3	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	<p>The Applicants refer to S_D1_5.2 Annex 5.2 to the Applicants response to Hearing Action Points: ISH1 6, 8, 9, 19, 26 & 28 - Rev F01 (REP1-039) which provides detail on construction scenarios.</p> <p>The Morgan Offshore Wind Project and the Morecambe Offshore Windfarm are being developed by two separate legal entities, each with different joint venture partners. They must be constructed and remain electrically separate from each other with separate Bilateral Grid Connection Agreements (BCAs) with the NESO. Whilst current planning legislation provides a mechanism for</p>

Reference	Written Representation Comment	Applicants' response
	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.	consenting two projects together within one DCO application, wider regulatory regimes do not allow the coordinated investment which would be required for the projects to commit to the delivery of joint construction, through the project development phase. This therefore means that the Morgan Offshore Wind Project and Morecambe Offshore Windfarm cannot commit to constructing at the same time. The Applicants have provided a technical note on construction scenarios, submitted in response to a request from the ExA within the Rule 9 letter (AS-070). Section 1.5 of the ES assessment of Construction Scenarios outlines the overarching construction scenarios considered for the Transmission Assets and includes specifics on the potential construction durations. The Applicants are engaged in continued discussions and negotiations with landowners, and are committed to providing updates with regard to the timing of the construction of the projects. The Applicants will also have ongoing engagement with occupiers of the land during the pre-construction and construction phases through the appointment of the agricultural liaison officer (ALO) as set out in the Outline Code of Construction Management Plan (APP-193) secured through the draft Development Consent Order (REP1-008), the scope of works for the ALO will include agreeing accommodation works and ongoing engagement about practical matters such as the movement of cattle to ensure disruption to farming enterprises is minimised wherever possible.
REP1-156 156.4	4. Our Clients wish to object to the routing shown and in particular the lack of information and consultation with respect to the easement. The granting of the DCO will if in its current form extinguish the easement benefitting our client thus depriving their caravan site of a water supply and no alternative has been offered.	The Applicants refer to their response RR-0874.5 (PDA-007) regarding the land rights sought and private water supply.
REP1-156 156.5	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	The Outline Code of Construction Practice (APP-193) is secured through Requirement 8 of Schedules 2A & 2B of the draft Development Consent Order (REP1-008). Following the grant of the DCO, the local authority and other relevant bodies will approve any design details in accordance with the parameters set out in the outline plans secured by the DCO. Requirement 8

Reference	Written Representation Comment	Applicants' response
	requiring them to comply with the Code of Construction Practice.	<p>of Schedules 2A&2B already includes the following wording that ensures the approved Code of Construction Practice will be complied with:</p> <p>3) The code of construction practice approved in relation to the relevant stage of the Project A onshore works and Project A intertidal works must be followed in relation to that stage of the Project A onshore works and Project A intertidal works. This same commitment applies for Project B. _</p> <p>Pursuant to this Requirement 8, the approved Code of Construction Practice must accord with the outline Code of Construction Practice which has been submitted</p>
REP1-156 156.6	<p>6. We are concerned regarding defects to the Code of Construction Practice and specifically highlight inter alia</p> <ul style="list-style-type: none"> - 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. - we believe that the proposed storage heights for topsoil is too high and will lead to defects in the structure of the topsoil. - we also suggest a strict prohibition on the removal of topsoil from any one Landowners property to another. <p>E&OE We reserve the right to amend or add to this submission</p>	<p>The Surface and groundwater management plan (APP-202) which forms part of the Outline Code of Construction Practice (APP-193) includes measures ensuring that surface water runoff and site drainage from construction is intercepted and attenuated on site, and that proposed dewatering and surface water discharges to watercourses are controlled in quality and volume to ensure there is no increase to flood risk. These measures will be agreed through the discharge of requirements with the relevant authorities through the submission of detailed Surface and Groundwater Management Plan(s). This is secured through Requirement 8 in Schedules 2A and 2B of the draft DCO (REP1-008).</p> <p>The Applicants note that within the DEFRA Construction Code of Practice for the Sustainable Use of Soils on Construction Sites (PB13298) (Defra, 2018) that stockpile heights of 3-4 m are commonly used for topsoil, but heights may need to be greater where storage space is limited.</p> <p>In addition to this, the Outline Soil Management Plan (APP-200) sets out measures to protect soil quality and structure during construction, ensuring that the land remains viable for farming in the long term. Construction activities will be undertaken in accordance with the detailed Soil Management Plan(s). Section 1.6 of the Outline Soil Management Plan (APP-200) provides detail on pre-construction surveys which will be undertaken to inform the detailed Soil Management Plans. It also includes the production of</p>

Reference	Written Representation Comment	Applicants' response
		an aftercare plan for agricultural areas within the Onshore Order Limits which will be subject to agreement with the affected landowner(s). This is secured in the DCO through Requirement 8 (Code of Construction Practice), which includes production of a Soil Management Plan in accordance with the Outline Soil Management Plan (APP-200) and Requirement 18 (Restoration of land temporarily used for construction) of the draft Development Consent Order Schedule 2A and 2B (REP1-008).

2.14 J W Kirkham & Sons Ltd

Table 2.14: REP1-157 – J W Kirkham & Sons Ltd

Reference	Written Representation Comment	Applicants' response
REP1-157 157.1	Objections lodged by Mr T.J.Kirkham 1. We consider the DCO application to be invalid. There has not been adequate consideration of alternative routes for on- shore cables. Specifically there is a route with landfall north of Blackpool near Rossall school which could connect in to the grid at Hillhouse with a very short route which could be undertaken by directional drilling. This would cause a tiny fraction of the disturbance compared to the route to Penwortham. There would be a saving of hundreds of millions of pounds and considerable job creation in a deprived area.	The Applicants refer to paragraphs 2.31 of The Applicants' Response to Relevant Representations Part 1 – Introduction and thematic responses (PDA-006) relating to site selection and alternatives. The Applicants have responded to the suggestion of a connection at Hillhouse in the Applicants response to Hearing Action Points: ISH1 6, 8, 9, 19, 26 & 28 (REP1-039). The Applicants maintain that the DCO Application is valid, and that all statutory requirements were met in order for it to be accepted for examination by the Planning Inspectorate.
REP1-157 157.2	2. We question whether it is appropriate that there is one DCO for two projects when there is no commitment from the two companies to work together during the construction phase. We request that the Planning	The Applicants refer to S_D1_5.2 Annex 5.2 to the Applicants response to Hearing Action Points: ISH1 6, 8, 9, 19, 26 & 28 - Rev F01 (REP1-039) which provides detail on construction scenarios.

Reference	Written Representation Comment	Applicants' response
	Inspectorate impose conditions to coordinate simultaneous construction in order that the landowners can have their land returned for them to farm it in a timely manner	<p>The Morgan Offshore Wind Project and the Morecambe Offshore Windfarm are being developed by two separate legal entities, each with different joint venture partners. They must be constructed and remain electrically separate from each other with separate Bilateral Grid Connection Agreements (BCAs) with the NESO. Whilst current planning legislation provides a mechanism for consenting two projects together within one DCO application, wider regulatory regimes do not allow the coordinated investment which would be required for the projects to commit to the delivery of joint construction, through the project development phase. This therefore means that the Morgan Offshore Wind Project and Morecambe Offshore Windfarm cannot commit to constructing at the same time. The Applicants have provided a technical note on construction scenarios, submitted in response to a request from the ExA within the Rule 9 letter (AS-070). Section 1.5 of the ES assessment of Construction Scenarios outlines the overarching construction scenarios considered for the Transmission Assets and includes specifics on the potential construction durations. The Applicants are engaged in continued discussions and negotiations with landowners, and are committed to providing updates with regard to the timing of the construction of the projects. The Applicants will also have ongoing engagement with occupiers of the land during the pre-construction and construction phases through the appointment of the agricultural liaison officer (ALO) as set out in the Outline Code of Construction Management Plan (APP-193) secured through the draft Development Consent Order (REP1-008), the scope of works for the ALO will include agreeing accommodation works and ongoing engagement about practical matters such as the movement of cattle to ensure disruption to farming enterprises is minimised where possible.</p>
REP1-157 157.3	3. We object to the routing of the cable corridor very close to our quiet, secluded holiday park and the disruption this will cause to our valued, loyal customers. We have put forward an alternative, more direct route to the north of Bridge Hall Farm.	The Applicants refer to their Relevant Representation response RR-0873.5 (PDA-007) in relation to the disruption to the holiday park and alternatives.

Reference	Written Representation Comment	Applicants' response
	We do not believe there has been appropriate consideration and assessment of the cable route alternatives.	

2.15 Michelle Ruth Fare

Table 2.15: REP1-173 – Michelle Ruth Fare

Reference	Written Representation Comment	Applicants' response
REP1-173 173.1	<p>INTRODUCTION</p> <p>SHP VALUERS Rural Practice Chartered Surveyors act on behalf of Deryck Lund and Michelle Fare of , 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.</p> <p>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.</p> <p>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</p>	The Applicants note the submission and refer Mr Pickervance to paragraph 2.31 Site selection and assessment of alternatives (PDA_005) which explains in detail the Applicants' approach to site selection.

Reference	Written Representation Comment	Applicants' response
	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.	
REP1-173 173.2	<p>SUMMARY (written representation exceeds 1500 words)</p> <p>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.</p> <p>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</p> <p>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;</p> <p>Environmental Statement Volume 1, Annex 4.3:</p> <p>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.</p> <p>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.</p>	The Applicants note the response and have responded in full to the individual points below.

Reference	Written Representation Comment	Applicants' response
	<p>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.</p> <p>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.</p> <p>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.</p> <p>4.5.3.3 Due to the presence of numerous constraints within 5 km...the buffer was increased to 8 km</p> <p>Substation sites are approximately 7km from Penwortham substation which must affect the efficiency of the power transmission. The substation locations are energy inefficient.</p>	

Reference	Written Representation Comment	Applicants' response
	<p>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.</p> <p>Other Material Matters</p> <p>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.</p>	
REP1-173 173.3	<p>WRITTEN REPRESENTATION</p> <p>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.</p> <p>MORGAN AND MORECAMBE OFFSHORE WIND FARMS: TRANSMISSION ASSETS</p> <p>Environmental Statement Volume 1, Annex 4.3: Selection and Refinement of the Onshore Infrastructure</p> <p>4.3.1.1 Guiding Principles for Onshore Infrastructure</p> <ul style="list-style-type: none"> • 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 	<p>The Applicants provided a clarification on the site selection for the onshore substation and the choice for separate sites within ISH1_12 of the response to Hearing Actions Points (REP1-037).</p> <p>The onshore substation site selection process considered the need to identify locations for two onshore substations, one for the Morgan Offshore Wind Project and one for the Morecambe Offshore Windfarm. Fundamentally, there were no land parcels within any zone sufficiently sized to accommodate together both onshore substation platform footprints and the associated necessary mitigation. This applies whether or not the substations were located in two immediately adjacent sites or a single site. This is the reason the onshore export cable route diverges to connect to the separate onshore substations.</p> <p>ISH1_7 of the response to Hearing Actions Points (REP1-037) explains how Green Belt was considered within the site selection and consideration of</p>

Reference	Written Representation Comment	Applicants' response
	<p>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.</p> <ul style="list-style-type: none"> • 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. <p>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</p>	<p>alternatives process. The Applicants' response to relevant representations – introduction and thematic responses (PDA-005) also provides more information on Green Belt matters within Section 2.17.2</p> <p>The Applicants have set out in section 6 of the Planning Statement (APP-233) the significant benefits of the Transmission Assets which, as a result of energy transmission from renewable sources, mean that even if the Transmission Assets were not considered to be Critical National Priority Infrastructure, that very special circumstances are considered to exist which outweigh any harm to Green Belt.</p> <p>The Applicants' reference to direct impacts to residential properties relates to direct 'physical' impact to residential properties and their residential curtilage. The farms identified by D Lund and M Fare Farming Partnership do not have direct impacts to residential properties – agricultural land is identified as required for the development of the Transmission Assets. There are no other private residential properties along Lower Lane and Kirkham Road and Dowbridge that have direct physical impact to the property or its residential curtilage.</p> <p>The Applicants acknowledge the potential visual impact of the onshore substations and their location within the existing landscape. Section 2.20.2 of the Applicants' response to relevant representations – introduction and thematic (PDA-005) provided detailed response in relation to the landscape and visual impacts associated with the onshore substations.</p> <p>The Applicants refer to paragraph 1.7.3.6 of the Statement of Reasons (REP1-012) which explains that the feedback received from Mr Lund and Ms Fare was a consideration in the final location of the Morgan Substation due to the impact the location of the Morgan substation would have on their holding and ability to farm in the future. The Applicants also refer to the Consultation Report (APP-170) which outlines the consultation undertaken for the Transmission Assets. The Applicants also refer to their response RR-0458</p>

Reference	Written Representation Comment	Applicants' response
		and RR-458.3 (PDA-007) which sets out the latest correspondence and meetings held with Mr Lund, Ms Fare and their appointed agent.
REP1-173 173.4	<p>4.3.1 Horlock Rules</p> <p>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.</p> <p>-Local Context, Land Use and Site Planning</p> <p>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.</p> <p>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.</p> <p>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</p>	<p>The Applicants acknowledge the potential visual impact of the onshore substations and their location within the existing landscape. The Applicants' siting of the onshore substations has sought to minimise their visibility as much as possible by utilising existing screening and maximising the distance from residential areas. The site selection and consideration of alternatives process for the siting of the onshore substations is detailed within Volume 1, Chapter 4: Site Selection and Consideration of Alternatives of the Environmental Statement (AS-026).</p> <p>It is noted that although close to the 'Areas of Separation' designation contained within Fylde Local Plan to 2032, no element of the Transmission Assets would cross or affect this designation. It is further noted that the Preliminary Environmental Information Report boundary was within the Kirkham and Newton Area of Separation. Changes to the scheme design have removed the Transmission Assets Order Limits outside of this Area. As such, no additional assessment of this policy is included within this section.</p> <p>The Applicants refer to Figure 10.4 of Volume 3, Figures - Part 5 of 7 (APP-135), which demonstrates that two onshore substation sites would be located outside of the extent of 'Strategic Policy GD3: Areas of Separation', and therefore, they would not compromise the function of the gap between Kirkham and Newton.</p> <p>Landscaping mitigation at the onshore substations is set out in the Outline Landscape Management Plan (OLMP) (document reference APP-208) and supported by the Outline Design Principles (APP-209). These explain that on-site mitigation planting proposals will be implemented around the onshore substations in order to minimise their visual effect from key viewpoints/receptors and to maximise screening opportunities, while also responding to local landscape character, pattern and growing conditions. The site design will also take account of the opportunities for site won topsoil and</p>

Reference	Written Representation Comment	Applicants' response
	<p>The land use effects of the proposal should be considered when planning the siting of substations or extensions.</p> <p>[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.</p>	<p>subsoil materials to be reused on site within landscape earthworks 'bunds'. These bunds will support the visual screening of the onshore substations while having a gradual external slope gradient that appears natural and complements the existing terrain (when looking towards the onshore substations). The Applicants note that Appendix A of the outline Landscape Management Plan (APP-208) identifies an indicative programme of landscape works setting out the programme according to relevant planting seasons and maximising opportunities for advance planting prior to construction to allow trees to mature during the construction works and in advance of completion of the onshore substations.</p> <p>The planting will be designed to include a mix of faster growing 'nurse' species and slower growing 'core' species. The core species will comprise a mix of preferred native, canopy species that will outlive the nurse species and characterise the woodland structure over the longer term. In locations where it is possible to achieve advanced planting, the landscape mitigation planting will be established as early as reasonably practicable in the construction phase</p> <p>The ES assesses potential impacts on landscape character and visual resources during construction, operation and maintenance and decommissioning with the proposed landscape mitigation outlined in the OLMP (APP208) to minimise impacts, where possible. The Applicants have provided a response to Green Belt matters in the response to 4.3.1.1.</p> <p>The Applicants have considered the application of the Horlock Rules throughout the site selection and consideration of alternatives process for the siting of the onshore infrastructure. Table 4.6 of Volume 1, Chapter 4: Site Selection and Consideration of Alternatives summarises the Horlock Rules and the Transmission Assets' approach to them: <i>Visual, noise and other environmental effects have been minimised as far as possible through the site selection process. Further mitigation for potential visual impacts is considered in Volume; Chapter 10: Landscape and Visual Resources of the ES (APP-123) with noise and vibration impacts considered in Volume 3; Chapter 8: Noise and Vibration of the ES (APP-117).</i></p>

Reference	Written Representation Comment	Applicants' response
		<p>Land use</p> <p>The Applicants refer to their response RR-0582 582.1 (PDA-007) regarding the land use assessment undertaken for the Application.</p>
REP1-173 173.5	<p>Design</p> <p>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</p> <p>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.</p>	<p>Design</p> <p>The Applicants have provided indicative design details within Section 3.15.7 of Volume 1, Chapter 3: Project Description of the ES (AS-024), including the design envelope (i.e. maximum permanent parameters) within Table 3.26. The onshore substations are also visualised in Figures 10.5.1 to 10.5.107 of Volume 3, Figures – Part 6 of 7 (APP-136).</p> <p>ISH1_22 of the Applicants' response to hearing action points (REP1-037) explained that the Applicants have adopted the Project Design Envelope (PDE) approach, also known as the Rochdale Envelope approach, as further explained in Section 3.4 of the Project Description (AS-024). This approach complies with the guidance within PINS Advice Note Nine: Rochdale Envelope. This approach provides maximum (and minimum where relevant) design parameters ensuring that the worst-case scenarios are identified and assessed in the Environmental Impact Assessment (EIA). The use of the PDE approach thus defines the clear boundaries (whilst retaining necessary project parameter flexibility) within which the final design of the Transmission Assets development must comply .</p> <p>Onshore substation footprints</p> <p>The Applicants provided a response in relation to the size of the onshore substation footprints within Annex 5.5 to the Applicants response to Hearing Action Points: ISH1_20: Comparable Onshore Substation Platform Footprints (REP1-042). The response concludes that the footprints of the Morgan and Morecambe onshore substation platform footprints are comparable to the onshore substation footprints of other nationally significant infrastructure projects for offshore wind bearing in mind that in all cases the platform size</p>

Reference	Written Representation Comment	Applicants' response
	<p>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</p> <p>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.</p> <p>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’.</p> <p>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.</p>	<p>will be influenced by the specific location of the substation and any identified constraints that it needs to accommodate.</p> <p>Table 4.6 of Volume 1, Annex 4.3: Selection and Refinement of the Onshore Infrastructure of the ES (AS-028) identifies the indicative parameters for the purposes of site selection. These parameters were identified for a point in time of the project development – specifically at the Preliminary Environmental Information Report stage – identified as Stage 3c of the site selection process. Subsequent refinements of the onshore substation search areas for the purposes of the DCO application (Stage 4c) identify that these indicative areas were amended. Section 4.6.3 of AS-028 explains the reasoning for these changes. The final maximum footprint of for the onshore substation platform, landscaping, access, drainage and attenuation is identified in Table 3.26 of Volume 1, Chapter 3: Project Description of the ES (AS-024) and includes Work No. 21A up to Dow Brook for mitigation purposes.</p> <p>Access rights</p> <p>The Applicants refer to their response RR-0458.3 regarding the inclusion of the farm track and Works No 34A40A41A.</p> <p>The Applicants note that identification of permanent accesses locations has typically targeted existing private roads or field accesses. However, there may be some locations where minor intrusive works (either ‘creation’ or ‘improvement’ which may be required in the future, e.g. in the event that an access or track requires works to make it passable (ie vegetation clearance or remedial surface works)</p> <p>Green Lane</p> <p>The measures to be implemented as part of the PRoW Management Plan seek to minimise impacts on public footpaths, bridleways and other promoted routes during construction of the Transmission Assets and provide appropriate management measures where required. These will apply to the management of the existing green lane bridleway track. The detailed Public</p>

Reference	Written Representation Comment	Applicants' response
	<p>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.</p> <p>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.</p>	<p>Rights of Way Management Plan(s), which will be developed in accordance with the outline Public Rights of Way Management Plan (AS-048), and which forms part of the detailed Code of Construction Practice(s). The detailed CoCP(s) are secured by Requirement 8 of Schedules 2A and 2B of the draft DCO (AS-004). Detailed Public Right of Way Plan(s) will be implemented as approved by the relevant local planning authority. The ALO will be the on site point of contact to ensure farming activities continue including where there is interface with the projects, this is secured through the Outline CoCP, Requirement 8 of Schedules 2A and 2B of the draft DCO (AS-004).</p> <p>Permanent access</p> <p>The permanent access (plots 11-130A, 12-014A, 12-016A and 12-018A REP1-004) is required for the access to the mitigation ponds within plot 12-019A. The substation access from the A583 does not link to the existing access proposed for the establishment of the works within plot 12-019A and the use of the green lane is unsuitable for the vehicles required for the creation of this work</p> <p>Mitigation alternatives</p> <p>The Applicants are aware plot 12-019A is not owned by D Lund and M Fare Farming Partnership. The Applicants discussed the requirement for the ponds and initial proposals in June 2024 with the land agent representing the executors of the late John Mason. The purpose of this pond creation area is to compensate for the permanent loss of ponds and suitable aquatic invertebrate habitat, including the existing Freshfield Farm Pond, North BHS and Freshfield Farm Pond, South BHS as a result of the construction of the Morgan onshore substation. Illustrative indicative landscape proposals for the Maximum Design Scenario of the onshore substations are shown on Figure 1.1 of the Outline Landscape Management Plan (AS-050).</p> <p>There is currently no legal requirement to provide for biodiversity net gain with applications for development consent under the Planning Act 2008 currently.</p>

Reference	Written Representation Comment	Applicants' response
		The Applicants are making a voluntary commitment to achieve an overall biodiversity benefit for areas to achieve an overall biodiversity benefit for areas of permanent habitat loss associated, however the land required for works 49A, plot 12-019A does not form part of the biodiversity benefit land.
REP1-173 173.6	<p>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.</p> <p>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.</p> <p>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.</p> <p>At a site meeting with DM and Jacqui Stoddart Morgan representative on 5 February 2025 this pond mitigation</p>	<p>The Applicants are not aware that Mr Lund and Ms Fare own the land identified for the environmental mitigation or biodiversity benefit. The Applicants note that the alternative land proposed is also not within the ownership of Mr Lund and Ms Fare and is unregistered.</p> <p>The Applicants refer Mr Lund and Ms Fare to the Applicants' approach to Site Selection for the Environmental Mitigation and Biodiversity Benefit areas document (S_D2_13). This document provides details on the site selection process and parameters for each of the environmental mitigation and biodiversity benefit areas.</p>

Reference	Written Representation Comment	Applicants' response
	<p>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</p>	
REP1-173 173.7	<p>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]</p> <p>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.</p>	<p>The outline Design Principles (oDP) (APP-209) sets out the considerations that will inform the detailed design of the permanent works at each of the onshore substations, including their height, layout, maximum footprint and access. The detailed design of each of the substations will be developed substantially in accordance with the oDP, as secured by Requirement 4(2) of Schedule 2A and Schedule 2B of the draft DCO (AS-004). These details will be submitted to and approved by the relevant planning authority prior to start of construction at each of the onshore substations.</p> <p>The Applicants response to Hearing Action Points (REP1-037) ISH1_7 provides details regarding the site selection and siting of the onshore substations within Green Belt land.</p>
REP1-173 173.8	<p>4.5.3 Stage 2c: Identification of onshore substation search areas</p> <p>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</p>	<p>The Applicants have explained the rationale for the 8 km radius search area in relation to the onshore substations (as illustrated in Figure 4.2 of Volume 1, Annex 4.3: Refinement of the Onshore Infrastructure (AS-028)) within ISH1_10 of the Applicants' response to Hearing Actions Points (REP1-037). Within this response it is noted that extending the search area beyond 8 km would not fulfil the requirements of an efficient and economic connection. In particular this would require longer 400 kV grid connection cables which</p>

Reference	Written Representation Comment	Applicants' response
	<p>power issues, to mitigate transmission losses, and to minimise adverse effects on economic efficiency.</p> <p>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.</p> <p>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.</p> <p>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</p> <p>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 ?</p> <p>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.</p>	<p>would likely result in electrical losses that would create inefficiencies within the generation transfer to the grid. If the distance was extended beyond 8 km, then electrical compensation would be required, which could include greater quantities or sizes of electrical equipment within the projects' onshore substation footprints. This would likely result in larger onshore substation footprints with potentially greater maximum height requirements.</p> <p>ISH1_12 of the Applicants' response to Hearing Actions Points (REP1-037) provides a summary of the site selection for the onshore substations within the 8 km radius search area. ISH1_7 of REP1-037 states that the four zones identified within the 8 km search area all had sections of Green Belt identified within them. Zones 1, 3 and 4 had large sections of Green Belt within them whereas, Zone 2 had a smaller section Green Belt but the BRAG process identified that this was not preferred for other reasons (i.e. lack of available land for siting). The Applicants concluded that Green Belt land could not be avoided for the site selection of the onshore substations.</p> <p>Table 4.6 of AS-026 summarises the approach to the siting of the onshore infrastructure for the Transmission Assets against the Horlock Rules. The Applicants consider a robust and comprehensive site selection and consideration of alternatives process was undertaken.</p>

Reference	Written Representation Comment	Applicants' response
REP1-173 173.9	<p>Creation of Onshore Substations Search Zones</p> <p>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.</p> <p>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.</p>	The Applicants have provided a response to this question within REP1-173 173.3.
REP1-173 173.10	<p>Other Material Planning Matters</p> <p>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</p>	The Applicants refer to their response RR-0458 458.2. Plot 12-010A is essential for the delivery of the project and works to the Morgan onshore substation. Plot 12-010A is approximately 3,771 square meters and makes up part of the 70,000 square meters required for temporary working area for the Morgan Onshore substation.

Reference	Written Representation Comment	Applicants' response
	haul road or the substation. shown edged in blue on the attached identification plan.	

2.16 Midgeland Riding School and Livery

Table 2.16: REP1-174 – Midgeland Riding School and Livery

Reference	Written Representation Comment	Applicants' response
REP1-174 174.1	<p>As Agents we wish to lodge representations on behalf of the above Landowner in respect of the proposed Morecambe and Morgan Offshore Wind Farms Development Consent Order.</p> <p>1. There has been a lack of consultation on the Scheme to Landowners, Occupiers with limited discussions regarding access, cable routes, drainage, land restoration, surface apparatus (eg. jointing chambers) and land uses.</p>	<p>The Applicants refer to their response to the relevant representation RR-1530 1530.1 (PDA-007) regarding consultation with landowners to date. The Applicants met with the Ellis family and their agent Mr Dennis, most recently on 31st March 2025 to discuss the topics raised within the relevant representation and which feature again within this written submission. The Applicants are striving to work with landowners and their agents to understand and discuss the impact the proposals have on their riding school and identify ways to mitigate impacts where practicable. In addition, negotiations are continuing on the Heads of Terms and a meeting is arranged with the agent for 10th June 2025.</p>
REP1-174 174.2	<p>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 by the Projects Agents prior to the close of the Statutory Consultation that the route had been decided. This means that some feedback from the Statutory Consultation could not have been considered when deciding on and refining route planning and site selection. There has been no discussion</p>	<p>The Applicants have addressed this in their relevant representation response RR-1530 1530.2 (PDA-007).</p>

Reference	Written Representation Comment	Applicants' response
	on the possible siting of the cable corridor slightly to the south and following submission of the DCO application the Project have indicated that they cannot amend the route	
REP1-174 174.3	<p>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 independently. 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. We request that the Planning Inspectorate 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 to minimise disruption.</p>	<p>The Applicants refer to S_D1_5.2 Annex 5.2 to the Applicants response to Hearing Action Points: ISH1 6, 8, 9, 19, 26 & 28 - Rev F01 (REP1-039) which provides detail on construction scenarios.</p> <p>The Morgan Offshore Wind Project and the Morecambe Offshore Windfarm are being developed by two separate legal entities, each with different joint venture partners. They must be constructed and remain electrically separate from each other with separate Bilateral Grid Connection Agreements (BCAs) with the NESO. Whilst current planning legislation provides a mechanism for consenting two projects together within one DCO application, wider regulatory regimes do not allow the coordinated investment which would be required for the projects to commit to the delivery of joint construction, through the project development phase. This therefore means that the Morgan Offshore Wind Project and Morecambe Offshore Windfarm cannot commit to constructing at the same time. The Applicants have provided a technical note on construction scenarios, submitted in response to a request from the ExA within the Rule 9 letter (AS-070). Section 1.5 of the ES assessment of Construction Scenarios outlines the overarching construction scenarios considered for the Transmission Assets and includes specifics on the potential construction durations. The Applicants are engaged in continued discussions and negotiations with landowners, and are committed to providing updates with regard to the timing of the construction of the projects. The Applicants will also have ongoing engagement with occupiers of the land during the pre-construction and construction phases through the appointment of the agricultural liaison officer (ALO) as set out in the Outline Code of Construction Management Plan (APP-193) secured through the draft Development Consent Order (REP1-008), the scope of works for the ALO will include agreeing accommodation works and ongoing engagement about practical matters such as the movement of cattle to ensure disruption to farming enterprises is minimised wherever possible.</p>

Reference	Written Representation Comment	Applicants' response
REP1-174 174.4	4. 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.	<p>The Outline Code of Construction Practice (APP-193) is secured through Requirement 8 of Schedules 2A & 2B of the draft Development Consent Order (REP1-008). Following the grant of the DCO, the local authority and other relevant bodies will approve any design details in accordance with the parameters set out in the outline plans secured by the DCO. Requirement 8 of Schedules 2A&2B already includes the following wording that ensures the approved Code of Construction Practice will be complied with:</p> <p>3) The code of construction practice approved in relation to the relevant stage of the Project A onshore works and Project A intertidal works must be followed in relation to that stage of the Project A onshore works and Project A intertidal works. This same commitment applies for Project B.</p> <p>Pursuant to this Requirement 8, the approved Code of Construction Practice must accord with the outline Code of Construction Practice which has been submitted.</p>
REP1-174 174.5	5. 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.	<p>The surface and groundwater management plan (APP-202) which forms part of the Outline Code of Construction Practice (APP-193) includes measures ensuring that surface water runoff and site drainage from construction is intercepted and attenuated on site, and that proposed dewatering and surface water discharges to watercourses are controlled in quality and volume to ensure there is no increase to flood risk. These measures will be agreed through the discharge of requirements with the relevant authorities through the submission of detailed Surface and Groundwater Management Plan(s). This is secured through Requirement 8 in Schedules 2A and 2B of the draft DCO (REP1-008).</p> <p>The Applicants note that within the DEFRA Construction Code of Practice for the Sustainable Use of Soils on Construction Sites (PB13298) (Defra, 2018) that stockpile heights of 3-4 m are commonly used for topsoil, but heights may need to be greater where storage space is limited.</p> <p>In addition to this, the Outline Soil Management Plan (APP-200) sets out measures to protect soil quality and structure during construction, ensuring</p>

Reference	Written Representation Comment	Applicants' response
		that the land remains viable for farming in the long term. Construction activities will be undertaken in accordance with the detailed Soil Management Plan(s). Section 1.6 of the Outline Soil Management Plan (APP-200) provides detail on pre-construction surveys which will be undertaken to inform the detailed Soil Management Plans. It also includes the production of an aftercare plan for agricultural areas within the Onshore Order Limits which will be subject to agreement with the affected landowner(s). This is secured in the DCO through Requirement 8 (Code of Construction Practice), which includes production of a Soil Management Plan in accordance with the Outline Soil Management Plan (APP-200) and Requirement 18 (Restoration of land temporarily used for construction) of the draft Development Consent Order Schedule 2A and 2B (REP1-008).
REP1-174 174.6	6. We note that the Companies are recently incorporated and bearing in mind that we have been notified that much of the funding/financial backing would come from BP we are also aware that BP have indicated that they are now pulling out of green energy projects and we would ask the Planning Inspectorate to closely question and ascertain whether the Companies have sufficient financial backing to complete the Project or whether it is simply something which they will be looking to make a quick buck and pass on, if the latter we would strongly urge the Planning Inspector to refuse the DCO.	<p>The Applicant refers to the Funding Statement for Morgan Offshore Wind Limited (APP-008) and its two Annexes (APP-009 and APP-011) which clearly demonstrate the ability of the joint venture partners for the Morgan Offshore Wind Project to secure the requisite funds to develop the project and satisfy any compensation claims for the acquisition of the land and rights needed for the project.</p> <p>Section 1.5.1.7 of the Funding Statement (APP-008) states "Article 33 of the draft DCO provides that the Applicant may not exercise a number of powers until it has put in place a guarantee or security equal to its potential liability to compensation under the DCO, or the Secretary of State confirms that no such guarantee is required because the Applicant has provided financial information sufficient to demonstrate that it has appropriate funding in place without a guarantee or alternative form of security to meet any liability to pay compensation under the DCO.</p> <p>The Applicants refer to the response to the CAH1_8 and CAH1_9 within S_D1_5.1 Annex 5.1 to the Applicants response to Hearing Acton Points:</p>

Reference	Written Representation Comment	Applicants' response
		ISH1 3 - Rev F01 (REP1-039) regarding the financial position of both Morgan Offshore Wind Limited and Morecambe Offshore Windfarm Limited.
REP1-174 174.7	7. As at the date of writing these representations (13th May 2025) we do not have a Heads of Terms from either of the Projects for our clients consideration despite having entered into extensive discussions as part of the Land Agency Group.	As detailed within the Land Rights Tracker (REP1-065), the Applicants issued the latest populated Heads of Term on 20 th May 2025 to the Ellis Family and their appointed agent Mr Dennis following a series of meetings with the land agent group to negotiate and update the template Heads of Term documents. The Applicant welcomes engagement on the terms issued to resolve any outstanding points of difference and a meeting is arranged with Mr Dennis to progress those negotiations on 10 th June 2025.
REP1-174 174.8	8. We have had meetings with the Project and our clients and in the latest meeting (end of March) the Project indicated that the widths required for the Works are a worst case scenario and could well be narrower. We believe that if the Inspector is minded to grant the DCO this should be on the basis of what is actually needed and not the Project's wish list which they describe to Landowners as their worst case scenario. We therefore feel that further information should be now made available with respect to the actual widths needed for the scheme together with location and size of surface apparatus.	At this stage of the Environmental Impact Assessment and consenting process, the detailed design for the Transmission Assets has not been undertaken. A maximum design envelope has been identified, within which the Applicants will undertake the authorised construction, operation and maintenance and decommissioning activities, this is the standard approach across the industry for development consent order applications. The Project Design Envelope approach defines a maximum design envelope and parameters within which the final design will sit. It allows flexibility for elements that are likely to require more detailed design subsequent to securing consent, such as specific siting and design of infrastructure and construction methods. Further detail on the maximum design scenarios are within the Project Description Chapter (AS-024). The Applicants will continue to engage with the landowners regarding the impact on the Riding School.
REP1-174 174.9	9. Midgeland Riding School is we believe the only riding school left in Blackpool and it caters for Riding for the Disabled and for those with special educational need in addition to the general populus. We are concerned that the routing of the cable will have a severe effect on not only our clients business but on the availability of such facilities for disabled and special needs people.	The Applicants understand that both Midgeland Riding School and Wrea Green Riding School cater for Riding for the Disabled. The Applicants are committed to developing the Morgan Offshore Wind Project and Morecambe Offshore Windfarm in a way that is sensitive to the environment, minimising potential effects to the local community and specific receptors, wherever possible. As part of the application, the Applicants have assessed potential impacts associated with noise and vibration, socio-economics and land use and recreation. The outcomes of the assessment for

Reference	Written Representation Comment	Applicants' response
		<p>each of these topic areas has been assessed and are reported in the Environmental Statement. Section 6.11.4 of Volume 3, Chapter 6: Land Use and Recreation (APP-104) has assessed the potential impact on recreational resources and concluded that with appropriate mitigation secured through the DCO, the potential effects would be minor adverse, which is not significant in Environmental Impact Assessment (EIA) terms.</p> <p>The Applicants acknowledge that the land affected in relation to the Riding School is used mainly for feed and grazing of the horses with the Riding School located approximately 1km to the north of the land affected. The Applicants are engaging with the Riding School to identify potential mitigation measures to reduce the impact on the holding.</p>
REP1-174 174.10	<p>10. The proposed routing of the cable corridor will have a severe effect on our client as this is the principal grazing area for the horses from Midgeland Riding School & Livery. Should this area be taken it will be necessary to seek alternative areas for the grazing of the horses for a period of up to 5 and a half years (dependent on whether the Projects coordinate construction) and no provision for this has been made. As this is grazing for horses which are stabled locally the grazing must be within walking distance of the stables. The horses cannot be moved to other alternative fields, as they would not then be available for use at the riding school, or for livery clients, providing the facilities outlined above. This grazing land is selected due to its locality and an emphasis must be added to the safety of the access, via a quiet track not used by vehicles. This cannot be provided by alternative land they own. The remainder of the land immediately surrounding the project is not suitable for grazing horses whilst ongoing construction work is under way.</p> <p>E&OE We reserve the right to amend or add to this submission.</p>	<p>The Applicants note the concern regarding available land and refer to their response to the relevant representation RR-1530 1530.6 (PDA-007).</p>

2.17 Mr G S and Mrs S I Bartlett

Table 2.17: REP1-176 – Mr G S and Mrs S I Bartlett

Reference	Written Representation Comment	Applicants' response
REP1-176 176.1	<p>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.</p> <p>1. There has been a lack of consultation on the Scheme to the Occupiers with no discussions regarding access, cable routes, drainage, land restoration, surface apparatus etc. No offer of terms in respect of entering into a voluntary arrangement has been made by the Scheme.</p>	<p>The Applicants refer to their response to the relevant representation RR-0790.1 (PDA-007) regarding consultation with landowners to date. The Applicants are striving to work with landowners and their agents to understand and discuss the impact the proposals have on their holdings and identify ways to mitigate impacts where practicable. The Applicants are due to meet with Mr Dennis on behalf of Mr and Mrs Bartlett on the 10th June 2025 to discuss the land rights sought.</p>
REP1-176 176.2	<p>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. Therefore all feedback from the consultation cannot have been considered prior to making the decision.</p>	<p>The Applicants have addressed this in their relevant representation response RR-0790.3 (PDA-007).</p>
REP1-176 176.3	<p>3. The two companies promoting the DCO are purporting to work together (which they are in respect of the promotion of the DCO) but there does not appear to be any commitment to work together during the construction. If the Planning Inspectorate are minded to grant consent we would 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</p>	<p>The Applicants refer to S_D1_5.2 Annex 5.2 to the Applicants response to Hearing Action Points: ISH1 6, 8, 9, 19, 26 & 28 - Rev F01 (REP1-039) which provides detail on construction scenarios.</p> <p>The Morgan Offshore Wind Project and the Morecambe Offshore Windfarm are being developed by two separate legal entities, each with different joint venture partners. They must be constructed and remain electrically separate</p>

Reference	Written Representation Comment	Applicants' response
	routes are located as close together as possible to avoid creating a blighted strip of land and also in terms of timing of works.	from each other with separate Bilateral Grid Connection Agreements (BCAs) with the NESO. Whilst current planning legislation provides a mechanism for consenting two projects together within one DCO application, wider regulatory regimes do not allow the coordinated investment which would be required for the projects to commit to the delivery of joint construction, through the project development phase. This therefore means that the Morgan Offshore Wind Project and Morecambe Offshore Windfarm cannot commit to constructing at the same time. The Applicants have provided a technical note on construction scenarios, submitted in response to a request from the ExA within the Rule 9 letter (AS-070). Section 1.5 of the ES assessment of Construction Scenarios outlines the overarching construction scenarios considered for the Transmission Assets and includes specifics on the potential construction durations. The Applicants are engaged in continued discussions and negotiations with landowners, and are committed to providing updates with regard to the timing of the construction of the projects. The Applicants will also have ongoing engagement with occupiers of the land during the pre-construction and construction phases through the appointment of the agricultural liaison officer (ALO) as set out in the Outline Code of Construction Management Plan (APP-193) secured through the draft Development Consent Order (REP1-008), the scope of works for the ALO will include agreeing accommodation works and ongoing engagement about practical matters such as the movement of cattle to ensure disruption to farming enterprises is minimised wherever possible.
REP1-176 176.4	4. 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.	<p>The Outline Code of Construction Practice (APP-193) is secured through Requirement 8 of Schedules 2A & 2B of the draft Development Consent Order (REP1-008). Following the grant of the DCO, the local authority and other relevant bodies will approve any design details in accordance with the parameters set out in the outline plans secured by the DCO. Requirement 8 of Schedules 2A&2B already includes the following wording that ensures the approved Code of Construction Practice will be complied with:</p> <p>3) The code of construction practice approved in relation to the relevant stage of the Project A onshore works and Project A intertidal works must be</p>

Reference	Written Representation Comment	Applicants' response
		<p>followed in relation to that stage of the Project A onshore works and Project A intertidal works. This same commitment applies for Project B.</p> <p>Pursuant to this Requirement 8, the approved Code of Construction Practice must accord with the outline Code of Construction Practice which has been submitted</p>
REP1-176 176.5	<p>5. 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.</p>	<p>The Surface and groundwater management plan (APP-202) which forms part of the Outline Code of Construction Practice (APP-193) includes measures ensuring that surface water runoff and site drainage from construction is intercepted and attenuated on site, and that proposed dewatering and surface water discharges to watercourses are controlled in quality and volume to ensure there is no increase to flood risk. These measures will be agreed through the discharge of requirements with the relevant authorities through the submission of detailed Surface and Groundwater Management Plan(s). This is secured through Requirement 8 in Schedules 2A and 2B of the draft DCO (REP1-008).</p> <p>The Applicants note that within the DEFRA Construction Code of Practice for the Sustainable Use of Soils on Construction Sites (PB13298) (Defra, 2018) that stockpile heights of 3-4 m are commonly used for topsoil, but heights may need to be greater where storage space is limited.</p> <p>In addition to this, the Outline Soil Management Plan (APP-200) sets out measures to protect soil quality and structure during construction, ensuring that the land remains viable for farming in the long term. Construction activities will be undertaken in accordance with the detailed Soil Management Plan(s). Section 1.6 of the Outline Soil Management Plan (APP-200) provides detail on pre-construction surveys which will be undertaken to inform the detailed Soil Management Plans. It also includes the production of an aftercare plan for agricultural areas within the Onshore Order Limits which will be subject to agreement with the affected landowner(s). This is secured in the DCO through Requirement 8 (Code of Construction Practice), which includes production of a Soil Management Plan in accordance with the Outline Soil Management Plan (APP-200) and Requirement 18 (Restoration</p>

Reference	Written Representation Comment	Applicants' response
		of land temporarily used for construction) of the draft Development Consent Order Schedule 2A and 2B (REP1-008).
REP1-176 176.6	<p>6. We note 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 particular with respect to the Mitigation area on this land. We also note that it would appear that the suggested level 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.</p> <p>E&OE We reserve the right to amend or add to this submission.</p>	The Applicants refer to their response RR-0790.6 (PDA-007) regarding the mitigation areas for the application.

2.18 Mr H and Mrs J Kirkham

Table 2.18: REP1-177 – Mr H and Mrs J Kirkham

Reference	Written Representation Comment	Applicants' response
REP1-177 177.1	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.	The Applicants refer to their response to the relevant representation RR-794.2 (PDA-007) regarding consultation with landowners to date. The Applicants met with Mr Kirkham and his agent Mr Dennis, most recently on 19 th March 2025 to discuss the topics raised within the relevant representation and which feature again within this written submission. The Applicants are striving to work with landowners and their agents to

Reference	Written Representation Comment	Applicants' response
	1. 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 representations could not have been considered.	understand and discuss the impact the proposals have on their holdings and identify ways to mitigate impacts where practicable and a further meeting is arranged for the 10 th June 2025 with Mr Dennis to discuss the land rights sought.
REP1-177 177.2	2. 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 independently. 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 minimise disruption.	<p>The Applicants refer to S_D1_5.2 Annex 5.2 to the Applicants response to Hearing Action Points: ISH1 6, 8, 9, 19, 26 & 28 - Rev F01 (REP1-039) which provides detail on construction scenarios.</p> <p>The Morgan Offshore Wind Project and the Morecambe Offshore Windfarm are being developed by two separate legal entities, each with different joint venture partners. They must be constructed and remain electrically separate from each other with separate Bilateral Grid Connection Agreements (BCAs) with the NESO. Whilst current planning legislation provides a mechanism for consenting two projects together within one DCO application, wider regulatory regimes do not allow the coordinated investment which would be required for the projects to commit to the delivery of joint construction, through the project development phase. This therefore means that the Morgan Offshore Wind Project and Morecambe Offshore Windfarm cannot commit to constructing at the same time. The Applicants have provided a technical note on construction scenarios, submitted in response to a request from the ExA within the Rule 9 letter (AS-070). Section 1.5 of the ES assessment of Construction Scenarios outlines the overarching construction scenarios considered for the Transmission Assets and includes specifics on the potential construction durations. The Applicants are engaged in continued discussions and negotiations with landowners, and are committed to providing updates with regard to the timing of the construction of the projects. The Applicants will also have ongoing engagement with occupiers of the land</p>

Reference	Written Representation Comment	Applicants' response
		during the pre-construction and construction phases through the appointment of the agricultural liaison officer (ALO) as set out in the Outline Code of Construction Management Plan (APP-193) secured through the draft Development Consent Order (REP1-008), the scope of works for the ALO will include agreeing accommodation works and ongoing engagement about practical matters such as the movement of cattle to ensure disruption to farming enterprises is minimised wherever possible.
REP1-177 177.3	<p>3. Our Clients wish to object to the routing shown and in particular to the temporary and permanent road crossings of Saltcoates Road. The crossings have been brought outwith the easement area and will affect the situation and enjoyment of the dwelling house. The temporary access points are on land belonging to Mr & Mrs Kirkham's family and the permanent rights impinge upon the property ownership at the dwelling house crossing into the curtilage of the house at the only direct access to the house from the public highway. Other road crossings such as Peel Road, Ballam Road and Bryning Lane accommodate the crossing within the easement area and we see no good reason why this cannot be the case at Saltcoats Road.</p> <p>At a meeting held with the Project Representatives on the 15th May 2025 we once again raised the question of the access and were notified that the reason for the access within the curtilage of Mr and Mrs Kirkham's garden was to do with the size of construction equipment however as we have previously stated and pointed out to them again the construction access is outwith their garden and this does not answer the question adequately. We have therefore requested and await copies of the highways assessments carried out for this and other accesses on the Kirkham land and will respond more fully to both the Scheme and to the Planning Inspectorate once these are made available and we have had opportunity to consider them. We would urge the Inspector to require the assessments to be made</p>	The Applicants refer to their response RR-794.5 (PDA-007) regarding plot 08-073, which forms part of the existing field entrance however is under the residential title. The Applicants are in ongoing engagement with Mr Dennis regarding his clients interest in the area and the request for information.

Reference	Written Representation Comment	Applicants' response
	available in full and to consider them in detail as to whether it is necessary to have an operational access crossing part of my Clients garden.	
REP1-177 177.4	4. 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.	<p>The Outline Code of Construction Practice (APP-193) is secured through Requirement 8 of Schedules 2A & 2B of the draft Development Consent Order (REP1-008). Following the grant of the DCO, the local authority and other relevant bodies will approve any design details in accordance with the parameters set out in the outline plans secured by the DCO. Requirement 8 of Schedules 2A&2B already includes the following wording that ensures the approved Code of Construction Practice will be complied with:</p> <p>3) The code of construction practice approved in relation to the relevant stage of the Project A onshore works and Project A intertidal works must be followed in relation to that stage of the Project A onshore works and Project A intertidal works. This same commitment applies for Project B. _</p> <p>Pursuant to this Requirement 8, the approved Code of Construction Practice must accord with the outline Code of Construction Practice which has been submitted.</p>
REP1-177 177.5	<p>5. We are concerned regarding defects to the Code of Construction Practice and specifically highlight inter alia</p> <ul style="list-style-type: none"> - 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 - we believe that the proposed storage heights for topsoil is too high and will lead to defects in the structure of the topsoil. - we also suggest a strict prohibition on the removal of topsoil from any one Landowners property to another. 	<p>The Surface and groundwater management plan (APP-202) which forms part of the Outline Code of Construction Practice (APP-193) includes measures ensuring that surface water runoff and site drainage from construction is intercepted and attenuated on site, and that proposed dewatering and surface water discharges to watercourses are controlled in quality and volume to ensure there is no increase to flood risk. These measures will be agreed through the discharge of requirements with the relevant authorities through the submission of detailed Surface and Groundwater Management Plan(s). This is secured through Requirement 8 in Schedules 2A and 2B of the draft DCO (REP1-008).</p> <p>The Applicants note that within the DEFRA Construction Code of Practice for the Sustainable Use of Soils on Construction Sites (PB13298) (Defra, 2018)</p>

Reference	Written Representation Comment	Applicants' response
		<p>that stockpile heights of 3-4 m are commonly used for topsoil, but heights may need to be greater where storage space is limited.</p> <p>In addition to this, the Outline Soil Management Plan (APP-200) sets out measures to protect soil quality and structure during construction, ensuring that the land remains viable for farming in the long term. Construction activities will be undertaken in accordance with the detailed Soil Management Plan(s). Section 1.6 of the Outline Soil Management Plan (APP-200) provides detail on pre-construction surveys which will be undertaken to inform the detailed Soil Management Plans. It also includes the production of an aftercare plan for agricultural areas within the Onshore Order Limits which will be subject to agreement with the affected landowner(s). This is secured in the DCO through Requirement 8 (Code of Construction Practice), which includes production of a Soil Management Plan in accordance with the Outline Soil Management Plan (APP-200) and Requirement 18 (Restoration of land temporarily used for construction) of the draft Development Consent Order Schedule 2A and 2B (REP1-008).</p>
REP1-177 177.6	<p>6. We suggest that the Inspector visit the Saltcoats road crossing on his accompanied viewing and we may wish to attend.</p> <p>E&OE We reserve the right to amend or add to this submission</p>	The Applicants note the request.

2.19 Mr Paul Hamilton Ellis and Paul Hamilton Ellis as current sole owner of land previously owned by himself and Patrick Frank Ellis

Table 2.19: REP1-178 – Mr Paul Hamilton Ellis and Paul Hamilton Ellis as current sole owner of land previously owned by himself and Patrick Frank Ellis

Reference	Written Representation Comment	Applicants' response
REP1-178 178.1	<p>As Agents we wish to lodge representations on behalf of the above Landowner in respect of the proposed Morecambe and Morgan Offshore Wind Farms Development Consent Order.</p> <p>1. There has been a lack of consultation on the Scheme to Landowners, Occupiers with limited discussions regarding access, cable routes, drainage, land restoration, surface apparatus (eg. jointing chambers) and land uses.</p>	<p>The Applicants refer to their response to the relevant representation RR-1660 1660.1 (PDA-007) regarding consultation with landowners to date. The Applicants met with the Ellis family and their agent Mr Dennis, most recently on 31st March 2025 to discuss the topics raised within the relevant representation and which feature again within this written submission. The Applicants are striving to work with landowners and their agents to understand and discuss the impact the proposals have on their riding school and identify ways to mitigate impacts where practicable. In addition, negotiations are continuing on the Heads of Terms and a meeting is arranged with the agent for 10th June 2025.</p>
REP1-178 178.2	<p>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 by the Projects Agents prior to the close of the Statutory Consultation that the route had been decided. This means that some feedback from the Statutory Consultation could not have been considered when deciding on and refining route planning and site selection. There has been no discussion on the possible siting of the cable corridor slightly to the south and following submission of the DCO application the Project have indicated that they cannot amend the route.</p>	<p>The Applicants have addressed this in their relevant representation response RR-1660 1660.2 (PDA-007).</p>

Reference	Written Representation Comment	Applicants' response
REP1-178 178.3	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. We request that the Planning Inspectorate 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.	<p>The Applicants refer to S_D1_5.2 Annex 5.2 to the Applicants response to Hearing Action Points: ISH1 6, 8, 9, 19, 26 & 28 - Rev F01 (REP1-039) which provides detail on construction scenarios.</p> <p>The Morgan Offshore Wind Project and the Morecambe Offshore Windfarm are being developed by two separate legal entities, each with different joint venture partners. They must be constructed and remain electrically separate from each other with separate Bilateral Grid Connection Agreements (BCAs) with the NESO. Whilst current planning legislation provides a mechanism for consenting two projects together within one DCO application, wider regulatory regimes do not allow the coordinated investment which would be required for the projects to commit to the delivery of joint construction, through the project development phase. This therefore means that the Morgan Offshore Wind Project and Morecambe Offshore Windfarm cannot commit to constructing at the same time. The Applicants have provided a technical note on construction scenarios, submitted in response to a request from the ExA within the Rule 9 letter (AS-070). Section 1.5 of the ES assessment of Construction Scenarios outlines the overarching construction scenarios considered for the Transmission Assets and includes specifics on the potential construction durations. The Applicants are engaged in continued discussions and negotiations with landowners, and are committed to providing updates with regard to the timing of the construction of the projects. The Applicants will also have ongoing engagement with occupiers of the land during the pre-construction and construction phases through the appointment of the agricultural liaison officer (ALO) as set out in the Outline Code of Construction Management Plan (APP-193) secured through the draft Development Consent Order (REP1-008), the scope of works for the ALO will include agreeing accommodation works and ongoing engagement about practical matters such as the movement of cattle to ensure disruption to farming enterprises is minimised wherever possible.</p>
REP1-178 178.4	4. 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 Outline Code of Construction Practice (APP-193) is secured through Requirement 8 of Schedules 2A & 2B of the draft Development Consent Order (REP1-008). Following the grant of the DCO, the local authority and

Reference	Written Representation Comment	Applicants' response
	the Planning Inspectorate impose a condition on the Developers requiring them to comply with the Code of Construction Practice.	<p>other relevant bodies will approve any design details in accordance with the parameters set out in the outline plans secured by the DCO. Requirement 8 of Schedules 2A&2B already includes the following wording that ensures the approved Code of Construction Practice will be complied with:</p> <p><i>3) The code of construction practice approved in relation to the relevant stage of the Project A onshore works and Project A intertidal works must be followed in relation to that stage of the Project A onshore works and Project A intertidal works. This same commitment applies for Project B.</i></p> <p>Pursuant to this Requirement 8, the approved Code of Construction Practice must accord with the outline Code of Construction Practice which has been submitted.</p>
REP1-178 178.5	5. 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.	<p>The Surface and groundwater management plan (APP-202) which forms part of the Outline Code of Construction Practice (APP-193) includes measures ensuring that surface water runoff and site drainage from construction is intercepted and attenuated on site, and that proposed dewatering and surface water discharges to watercourses are controlled in quality and volume to ensure there is no increase to flood risk. These measures will be agreed through the discharge of requirements with the relevant authorities through the submission of detailed Surface and Groundwater Management Plan(s). This is secured through Requirement 8 in Schedules 2A and 2B of the draft DCO (REP1-008).</p> <p>The Applicants note that within the DEFRA Construction Code of Practice for the Sustainable Use of Soils on Construction Sites (PB13298) (Defra, 2018) that stockpile heights of 3-4 m are commonly used for topsoil, but heights may need to be greater where storage space is limited.</p> <p>In addition to this, the Outline Soil Management Plan (APP-200) sets out measures to protect soil quality and structure during construction, ensuring that the land remains viable for farming in the long term. Construction activities will be undertaken in accordance with the detailed Soil Management Plan(s). Section 1.6 of the Outline Soil Management Plan (APP-200)</p>

Reference	Written Representation Comment	Applicants' response
		provides detail on pre-construction surveys which will be undertaken to inform the detailed Soil Management Plans. It also includes the production of an aftercare plan for agricultural areas within the Onshore Order Limits which will be subject to agreement with the affected landowner(s). This is secured in the DCO through Requirement 8 (Code of Construction Practice), which includes production of a Soil Management Plan in accordance with the Outline Soil Management Plan (APP-200) and Requirement 18 (Restoration of land temporarily used for construction) of the draft Development Consent Order Schedule 2A and 2B (REP1-008).
REP1-178 178.6	6. We note that the Companies are recently incorporated and bearing in mind that we have been notified that much of the funding/financial backing would come from BP we are also aware that BP have indicated that they are now pulling out of green energy projects and we would ask the Planning Inspectorate to closely question and ascertain whether the Companies have sufficient financial backing to complete the Project or whether it is simply something which they will be looking to make a quick buck and pass on, if the latter we would strongly urge the Planning Inspector to refuse the DCO.	<p>The Applicant refers to the Funding Statement for Morgan Offshore Wind Limited (APP-008) and its two Annexes (APP-009 and APP-011) which clearly demonstrate the ability of the joint venture partners for the Morgan Offshore Wind Project to secure the requisite funds to develop the project and satisfy any compensation claims for the acquisition of the land and rights needed for the project.</p> <p>Section 1.5.1.7 of the Funding Statement (APP-008) states "Article 33 of the draft DCO provides that the Applicant may not exercise a number of powers until it has put in place a guarantee or security equal to its potential liability to compensation under the DCO, or the Secretary of State confirms that no such guarantee is required because the Applicant has provided financial information sufficient to demonstrate that it has appropriate funding in place without a guarantee or alternative form of security to meet any liability to pay compensation under the DCO.</p> <p>The Applicants refer to the response to the CAH1_8 and CAH1_9 within S_D1_5.1 Annex 5.1 to the Applicants response to Hearing Acton Points: ISH1 3 - Rev F01 (REP1-039) regarding the financial position of both Morgan Offshore Wind Limited and Morecambe Offshore Windfarm Limited.</p>
REP1-178	7. As at the date of writing these representations (13th May 2025) we do not have a Heads of Terms from either	As detailed within the Land Rights Tracker (REP1-065), the Applicants issued the latest populated Heads of Term on 20 th May 2025 to the Ellis

Reference	Written Representation Comment	Applicants' response
178.7	of the Projects for our clients consideration despite having entered into extensive discussions as part of the Land Agency Group.	Family and their appointed agent Mr Dennis following a series of meetings with the land agent group to negotiate and update the template Heads of Term documents. The Applicant welcomes engagement on the terms issued to resolve any outstanding points of difference and a meeting is arranged with Mr Dennis to progress those negotiations on 10 th June 2025.
REP1-178 178.8	8. We have had meetings with the Project and our clients and in the latest meeting (end of March) the Project indicated that the widths required for the Works are a worst case scenario and could well be narrower. We believe that if the Inspector is minded to grant the DCO this should be on the basis of what is actually needed and not the Project's wish list which they describe to Landowners as their worst case scenario. We therefore feel that further information should be now made available with respect to the actual widths needed for the scheme together with location and size of surface apparatus.	<p>At this stage of the Environmental Impact Assessment and consenting process, the detailed design for the Transmission Assets has not been undertaken. A maximum design envelope has been identified, within which the Applicants will undertake the authorised construction, operation and maintenance and decommissioning activities, this is the standard approach across the offshore wind industry for development consent order applications.</p> <p>The Project Design Envelope approach defines a design envelope and parameters within which the final design will sit. It allows flexibility for elements that are likely to require more detailed design subsequent to securing consent, such as specific siting and design of infrastructure and construction methods. Further detail on the maximum design scenarios are within the Project Description Chapter (AS-024).</p> <p>The Applicants will continue to engage with the landowners regarding the impact on the Riding School.</p>
REP1-178 178.9	9. It would appear that the Project have either failed to notice the construction of Lytham St Annes Way (a road constructed between 2021 and 2024 and opened in June 2024) which is on the eastern boundary of our clients land or ignored the impact of its construction. Following the construction of this road the access points to our clients land from the public highway are now different to those previously and no account of this appears to have been taken place in the design and location of the access points requested by the Project onto our clients land. In particular we believe that Plot 05-044 together with the other relevant	The Applicants refer to their response RR-1660 1660.6 (PDA-007) regarding Lytham St Annes Way.

Reference	Written Representation Comment	Applicants' response
	<p>plots adjoining it should be removed to the north to the access point direct off the public highway into Plot 05-052a and 05-051b. Likewise the operational access being Plots 05-057 and 05-054 should be amended.</p> <p>E&OE We reserve the right to amend or add to this submission</p>	

2.20 Mr T J Kirkham, Mrs J E Worlock and Mrs J A Myerscough

Table 2.20: REP1-179 – Mr T J Kirkham, Mrs J E Worlock and Mrs J A Myerscough

Reference	Written Representation Comment	Applicants' response
REP1-179 179.1	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.	The Applicants refer to their response to the relevant representation RR-870.1 (PDA-007) regarding consultation with landowners to date. The Applicants met with Mr Kirkham on behalf of the group and his agent Mr Dennis, most recently on 19 th March 2025 to discuss the topics raised within the relevant representation and which feature again within this written submission. The Applicants are striving to work with landowners and their agents to understand and discuss the impact the proposals have on their holdings and identify ways to mitigate impacts where practicable and a further meeting is arranged for 10 th June 2025 with Mr Dennis to discuss the land rights sought.
REP1-179 179.2	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	The Applicants have addressed this in their relevant representation response RR-870.3 (PDA-007).

Reference	Written Representation Comment	Applicants' response
	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.	
REP1-179 179.3	<p>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.</p>	<p>The Applicants refer to S_D1_5.2 Annex 5.2 to the Applicants response to Hearing Action Points: ISH1 6, 8, 9, 19, 26 & 28 - Rev F01 (REP1-039) which provides detail on construction scenarios.</p> <p>The Morgan Offshore Wind Project and the Morecambe Offshore Windfarm are being developed by two separate legal entities, each with different joint venture partners. They must be constructed and remain electrically separate from each other with separate Bilateral Grid Connection Agreements (BCAs) with the NESO. Whilst current planning legislation provides a mechanism for consenting two projects together within one DCO application, wider regulatory regimes do not allow the coordinated investment which would be required for the projects to commit to the delivery of joint construction, through the project development phase. This therefore means that the Morgan Offshore Wind Project and Morecambe Offshore Windfarm cannot commit to constructing at the same time. The Applicants have provided a technical note on construction scenarios, submitted in response to a request from the ExA within the Rule 9 letter (AS-070). Section 1.5 of the ES assessment of Construction Scenarios outlines the overarching construction scenarios considered for the Transmission Assets and includes specifics on the potential construction durations. The Applicants are engaged in continued discussions and negotiations with landowners, and are committed to providing updates with regard to the timing of the construction of the projects. The Applicants will also have ongoing engagement with occupiers of the land during the pre-construction and construction phases through the appointment of the agricultural liaison officer (ALO) as set out in the Outline Code of Construction Management Plan (APP-193) secured through the draft Development Consent Order (REP1-008), the scope of works for the ALO will include agreeing accommodation works and ongoing engagement about</p>

Reference	Written Representation Comment	Applicants' response
		practical matters such as the movement of cattle to ensure disruption to farming enterprises is minimised wherever possible.
REP1-179 179.4	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.	The Applicants refer to paragraphs 2.31 of The Applicants' Response to Relevant Representations Part 1 – Introduction and thematic responses (PDA-006) and The Applicants have responded to this Hearing Action Point in the Applicants response to Hearing Action Points: ISH1 6, 8, 9, 19, 26 & 28 (REP1-039).
REP1-179 179.5	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.	<p>The Outline Code of Construction Practice (APP-193) is secured through Requirement 8 of Schedules 2A & 2B of the draft Development Consent Order (REP1-008). Following the grant of the DCO, the local authority and other relevant bodies will approve any design details in accordance with the parameters set out in the outline plans secured by the DCO. Requirement 8 of Schedules 2A&2B already includes the following wording that ensures the approved Code of Construction Practice will be complied with:</p> <p>3) The code of construction practice approved in relation to the relevant stage of the Project A onshore works and Project A intertidal works must be followed in relation to that stage of the Project A onshore works and Project A intertidal works. This same commitment applies for Project B.</p> <p>Pursuant to this Requirement 8, the approved Code of Construction Practice must accord with the outline Code of Construction Practice which has been submitted.</p>
REP1-179 179.6	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	The Surface and groundwater management plan (APP-202) which forms part of the Outline Code of Construction Practice (APP-193) includes measures ensuring that surface water runoff and site drainage from construction is intercepted and attenuated on site, and that proposed dewatering and surface water discharges to watercourses are controlled in quality and volume to ensure there is no increase to flood risk. These measures will be

Reference	Written Representation Comment	Applicants' response
	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.	<p>agreed through the discharge of requirements with the relevant authorities through the submission of detailed Surface and Groundwater Management Plan(s). This is secured through Requirement 8 in Schedules 2A and 2B of the draft DCO (REP1-008).</p> <p>The Applicants note that within the DEFRA Construction Code of Practice for the Sustainable Use of Soils on Construction Sites (PB13298) (Defra, 2018) that stockpile heights of 3-4 m are commonly used for topsoil, but heights may need to be greater where storage space is limited.</p> <p>In addition to this, the Outline Soil Management Plan (APP-200) sets out measures to protect soil quality and structure during construction, ensuring that the land remains viable for farming in the long term. Construction activities will be undertaken in accordance with the detailed Soil Management Plan(s). Section 1.6 of the Outline Soil Management Plan (APP-200) provides detail on pre-construction surveys which will be undertaken to inform the detailed Soil Management Plans. It also includes the production of an aftercare plan for agricultural areas within the Onshore Order Limits which will be subject to agreement with the affected landowner(s). This is secured in the DCO through Requirement 8 (Code of Construction Practice), which includes production of a Soil Management Plan in accordance with the Outline Soil Management Plan (APP-200) and Requirement 18 (Restoration of land temporarily used for construction) of the draft Development Consent Order Schedule 2A and 2B (REP1-008).</p>
REP1-179 179.7	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	The Applicants understand that Mr Kirkham, Mrs Worlock and Mrs Myerscough are concerned about the use of Plot 07-002 (REP1-004). This plot is required for temporary mitigation during construction and does not form part of the Applicants' voluntary commitment to achieve biodiversity benefit. The Applicants refer to their response to the response to relevant representation RR-0870.8 (PDA-007) which sets out the requirement for the temporary mitigation. Plot 07-002 is required for the delivery for the project as it provides essential mitigation and therefore it is appropriate and necessary for the compulsory acquisition powers sought, albeit it is the

Reference	Written Representation Comment	Applicants' response
	where bio-diversity net gain and mitigation works were required for the Scheme	Applicants' preference to secure the rights required through the voluntary land agreements sought.
REP1-179 179.8	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.	The Applicants note that onshore export cable corridor is partly located within the Lytham Moss Biological Heritage Site (BHS) (as shown on Figure 1.4 of Volume 3, Annex 3.1: Onshore ecology desk study technical study (APP-067). The Applicants assessed the potential impact of disturbance and displacement from the construction of the Transmission Assets on non-breeding geese, ducks and swans and non-breeding waders (see section 4.14 of Volume 4, Chapter 4: Onshore and intertidal ornithology (APP-090). The assessment concludes that in the absence of mitigation the construction of the Transmission Assets would result in a significant adverse effect. On this basis, the Applicants have made a commitment (CoT 107 of Volume 1, Annex 5.3: Commitments Register) (APP-195) that where construction activities are undertaken along the onshore export cable corridor within areas of Functionally Linked Land (Lytham Moss Biological Heritage Site) in proximity to Higher Ballam and Lower Ballam, a mitigation area will be provided for supplementary feeding of pink-footed goose and whooper swan. With the implementation of this mitigation, the residual effect is reduced to minor adverse.
REP1-179 179.9	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.	The Applicants have provided a technical note which provides detail on the Site selection for the Environmental Mitigation and Biodiversity Benefit Areas (S_D2_13). The mitigation area at Lytham Moss will provide temporary seasonal foraging ground for geese, swans and waders as replacement habitat for birds displaced by proposed construction activity within areas of Functionally Linked Land (Lytham Moss Biological Heritage Site) Figure 1.4 of Volume 3, Annex 3.1: Onshore ecology desk study technical study (APP-067).. The mitigation area at Lytham Moss will not adversely affect the existing nearby mitigation area (the Farmland Conservation Area).
REP1-179	10. The proposed location of the Temporary Mitigation area will be closer to the flight path for the approach to	The Applicants are aware of Blackpool Airport's concerns regarding the management of the temporary construction mitigation area at Lytham Moss

Reference	Written Representation Comment	Applicants' response
179.10	Blackpool airport and will increase the risk of Bird strike for aeroplanes with the inherent safety issues.	and its ability to coexist with the Airport's existing wildlife management plan. The Applicants are committed to working with Blackpool Airport and are actively consulting with Blackpool Airport Operations Limited regarding these wildlife management measures.
REP1-179 179.11	<p>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</p> <p>(a) why are two accesses required approximately 200m apart?</p> <p>(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.</p> <p>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.</p> <p>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</p>	<p>a) The Applicants are jointly seeking a single consent for the Morgan Offshore Wind Project and the Morecambe Offshore Windfarm Transmission Assets comprising aligned onshore export cable corridors to separate onshore substations, and from these substations an aligned onward connection to the National Grid at Penwortham, Lancashire.</p> <p>Accordingly, two separate accesses are proposed to meet the independent construction requirements of each discrete project.</p> <p>b) The basis of design for the accesses is to provide separation from residential dwellings and from each other to limit vehicle conflicts. The accesses are required to interface perpendicular with the public highway to maximise visibility for departing vehicles. If the accesses followed field boundaries this would introduce drivers entering at an obtuse angle and visibility to the left would be compromised. This arrangement would not meet current design standards and would not be acceptable to the highway authority or a mandatory third party road safety audit. Therefore, it has not been possible to utilise the existing field accesses and accommodate the basis of design.</p>

Reference	Written Representation Comment	Applicants' response
	<p>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.</p>	
REP1-179 179.12	<p>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</p>	<p>As noted in the previous response, the Applicants are jointly seeking a single consent for the Morgan Offshore Wind Project and the Morecambe Offshore Windfarm Transmission Assets and accordingly, separate accesses are proposed to meet the independent construction requirements of each discrete project.</p> <p>The Applicants refer to B11 Access to Works Plan, Sheet 8 (App-157) – it can be noted that four accesses are proposed in total; east and west of Saltcotes Road positioned centrally in the cable corridor, serving Morgan Transmission Assets (TAT_MG_26 and TAT_MG_25) and east and west of Saltcotes Road to the south of the cable corridor serving Morecambe Transmission Assets (TAT_MC_27 and TAT_MC_28).</p> <p>For safety reasons there is a requirement to keep a level of separation between proposed and exiting accesses to minimise vehicle conflicts, this has necessitated positioning the Morecambe construction accesses to the south of the cable corridor.</p>

Reference	Written Representation Comment	Applicants' response
	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.	With reference to J8 Outline Highway Access Management Plan, Appendix A, Drawing No PC1165-RHD-ZZ-XX-SW-TP-0013 (AS-052) – it can be noted that access TAT_MC_28 (also referred to as simply AC28) has been carefully positioned to ensure the standard compliant visibility splay does not encroach into the adjacent dwelling's front garden.
REP1-179 179.13	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.	The Applicants note the request.

2.21 Mrs L McNicholas

Table 2.21: REP1-180 – Mrs L McNicholas

Reference	Written Representation Comment	Applicants' response
REP1-180 180.1	As Agents we wish to lodge representations on behalf of the above Landowner in respect of the proposed Morecambe and Morgan Offshore Wind Farms Development Consent Order. 1. There has been a lack of consultation on the Scheme to Landowners, Occupiers with limited discussions regarding	The Applicants refer to their response to the relevant representation RR-1295 1295.1 (PDA-007) regarding consultation with landowners to date. The Applicants are due to meet with Mr Dennis on 10 th June 2025 to discuss the topics raised within the relevant representation and which feature again within this written submission. The Applicants are striving to work with landowners and their agents to understand and discuss the impact the proposals have on their holdings and identify ways to mitigate impacts where practicable.

Reference	Written Representation Comment	Applicants' response
	access, cable routes, drainage, land restoration, surface apparatus (eg. jointing chambers) and land uses.	
REP1-180 180.2	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. Therefore all feedback from the consultation cannot have been considered prior to making the decision.	The Applicants have addressed this in their relevant representation response RR-1295 1295.3 (PDA-007).
REP1-180 180.3	3. The two companies promoting the DCO are purporting to work together (which they are in respect of the promotion of the DCO) but there does not appear to be any commitment to work together during the construction. If the Planning Inspectorate are minded to grant consent we would 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 a blighted strip of land and also in terms of timing of works.	<p>The Applicants refer to S_D1_5.2 Annex 5.2 to the Applicants response to Hearing Action Points: ISH1 6, 8, 9, 19, 26 & 28 - Rev F01 (REP1-039) which provides detail on construction scenarios.</p> <p>The Morgan Offshore Wind Project and the Morecambe Offshore Windfarm are being developed by two separate legal entities, each with different joint venture partners. They must be constructed and remain electrically separate from each other with separate Bilateral Grid Connection Agreements (BCAs) with the NESO. Whilst current planning legislation provides a mechanism for consenting two projects together within one DCO application, wider regulatory regimes do not allow the coordinated investment which would be required for the projects to commit to the delivery of joint construction, through the project development phase. This therefore means that the Morgan Offshore Wind Project and Morecambe Offshore Windfarm cannot commit to constructing at the same time. The Applicants have provided a technical note on construction scenarios, submitted in response to a request from the ExA within the Rule 9 letter (AS-070).</p> <p>Section 1.5 of the ES assessment of Construction Scenarios outlines the overarching construction scenarios considered for the Transmission Assets and includes specifics on the potential construction durations. The Applicants</p>

Reference	Written Representation Comment	Applicants' response
		are engaged in continued discussions and negotiations with landowners, and are committed to providing updates with regard to the timing of the construction of the projects. The Applicants will also have ongoing engagement with occupiers of the land during the pre-construction and construction phases through the appointment of the agricultural liaison officer (ALO) as set out in the Outline Code of Construction Management Plan (APP-193) secured through the draft Development Consent Order (REP1-008), the scope of works for the ALO will include agreeing accommodation works and ongoing engagement about practical matters such as the movement of cattle to ensure disruption to farming enterprises is minimised wherever possible.
REP1-180 180.4	4. 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.	<p>The Outline Code of Construction Practice (APP-193) is secured through Requirement 8 of Schedules 2A & 2B of the draft Development Consent Order (REP1-008). Following the grant of the DCO, the local authority and other relevant bodies will approve any design details in accordance with the parameters set out in the outline plans secured by the DCO. Requirement 8 of Schedules 2A&2B already includes the following wording that ensures the approved Code of Construction Practice will be complied with:</p> <p><i>3) The code of construction practice approved in relation to the relevant stage of the Project A onshore works and Project A intertidal works must be followed in relation to that stage of the Project A onshore works and Project A intertidal works. This same commitment applies for Project B.</i></p> <p>Pursuant to this Requirement 8, the approved Code of Construction Practice must accord with the outline Code of Construction Practice which has been submitted and will be updated where necessary through the Examination.</p>
REP1-180 180.5	5. 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	The Surface and groundwater management plan (APP-202) which forms part of the Outline Code of Construction Practice (APP-193) includes measures ensuring that surface water runoff and site drainage from construction is intercepted and attenuated on site, and that proposed dewatering and surface water discharges to watercourses are controlled in quality and

Reference	Written Representation Comment	Applicants' response
	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.	<p>volume to ensure there is no increase to flood risk. These measures will be agreed through the discharge of requirements with the relevant authorities through the submission of detailed Surface and Groundwater Management Plan(s). This is secured through Requirement 8 in Schedules 2A and 2B of the draft DCO (REP1-008).</p> <p>The Applicants note that within the DEFRA Construction Code of Practice for the Sustainable Use of Soils on Construction Sites (PB13298) (Defra, 2018) that stockpile heights of 3-4 m are commonly used for topsoil, but heights may need to be greater where storage space is limited.</p> <p>In addition to this, the Outline Soil Management Plan (APP-200) sets out measures to protect soil quality and structure during construction, ensuring that the land remains viable for farming in the long term. Construction activities will be undertaken in accordance with the detailed Soil Management Plan(s). Section 1.6 of the Outline Soil Management Plan (APP-200) provides detail on pre-construction surveys which will be undertaken to inform the detailed Soil Management Plans. It also includes the production of an aftercare plan for agricultural areas within the Onshore Order Limits which will be subject to agreement with the affected landowner(s). This is secured in the DCO through Requirement 8 (Code of Construction Practice), which includes production of a Soil Management Plan in accordance with the Outline Soil Management Plan (APP-200) and Requirement 18 (Restoration of land temporarily used for construction) of the draft Development Consent Order Schedule 2A and 2B (REP1-008).</p>
REP1-180 180.6	6. The proposed routing of the Morgan cable corridor will have a severe effect of our client as almost 50% of her land will be required/made unusable for the that scheme. The Morecambe Scheme has a far lesser effect and we believe that there is opportunity for the Morecambe Scheme to be taken out of our clients land entirely. There is no provision of alternative land for the Landowner who will need to find alternative accommodation for her horses for a period of potentially up to 5 and a half years.	<p>The Applicants have sought to obtain feedback from Ms McNicholas and her land agent on the potential impact on the land through requests during the pre application phase.</p> <p>The disruption to the land in this location will be temporary while the cables are installed, and the land will be reinstated to its current use as soon as practicable following completion of the cable installation allowing current grazing of horses to resume.</p>

Reference	Written Representation Comment	Applicants' response
	E&OE We reserve the right to amend or add to this submission.	In order to ensure this the Applicants have made a commitment (CoT08 of Volume 1, Annex 5.3 of the Environmental Statement (AS-030) to reinstate the cable working area post construction to its pre-existing condition as far as reasonably practical in line with relevant guidance. This is secured via article 29 and Requirement 16 of Schedules 2A & 2B of the draft DCO (AS-004). The Applicants are meeting with Ms McNicholas' agent on 10 th June 2025 to discuss the impacts on the land and identify potential mitigation measures through the voluntary agreement sought for the land rights.

2.22 National Farmers Union

Table 2.22: REP1-185 – National Farmers Union

Reference	Written Representation Comment	Applicants' response
REP1-185 185.1	Dear Sirs Please find attached a NFU post written submission following the hearings on the 30th April 1st and 2nd May 2025 and a list of the NFU members affected by the proposed projects. The NFU would be grateful if the list of NFU members could remain confidential and not published. Following the Rule 8 letter, the NFU can confirm that there has been an initial meeting with the Dalcour Maclaren on behalf of the Applicant to discuss a Statement of Common Ground and gives notification of a wish to attend a further compulsory acquisition hearing. Yours faithfully	The Applicants note the response and welcome the engagement from the NFU in relation to the Statement of Common Ground. The Applicants note that the ExA's request at HAP 43 was <i>Provide a list of the parties that the NFU represents for this Project</i> , rather than a list of NFU members. The Applicants understand that all NFU members who are affected by the Transmission Assets have separately appointed land agents to represent them in relation to the land rights sought and matters relating to their land, and that the NFU has not been specifically appointed to represent any landowner or tenant in relation to this DCO Application.
REP1-185 185.2	Introduction Submissions on behalf of the National Farmers Union ("NFU") in respect of the application for a Development Consent Order (DCO) by Morgan and Morecambe Offshore Wind Farms Transmission Assets. The NFU is	The Applicants note the response.

Reference	Written Representation Comment	Applicants' response
	making a case on behalf of its members. This submission is submitted to highlight issues of concern which have been raised by NFU on behalf of NFU members and landowners represented by LIG who will be affected by this project and were raised at the IS H on 30th April and 1 st May and the compulsory acquisition hearing on 2nd May 2025.	
REP1-185 185.3	Site Selection Process At the hearing questions were raised to the Applicant in regard to the Hillhouse/ Stanah route to the National Grid (NG) Penwortham substation. It was not made clear at the hearing whether the existing overhead line from Stanah to Penwortham has the capacity to take the electric form both projects or whether a new overhead line or underground cables would be required to take the electric form both projects. The NFU would like confirmation of this to understand further why the Applicant has not taken this site selection route forward.	The Applicants refer to paragraphs 2.31.2.14 – 2.31.2.18 of The Applicants' Response to Relevant Representations Part 1 – Introduction and thematic responses (PDA-006) and Hearing Action Point ISH1_9 (REP1-039) which responds to this point around Hillhouse / Stanah. The Applicants refer the NFU to Annex 5.2 to the Applicants response to Hearing Action Points: ISH1 6, 8, 9, 19, 26 & 28 (REP1-039).
REP1-185 185.4	Development Scenarios Completion Times of Projects: It was stated by Applicant that there is a possibility for the first project to be completed, that there then could be a gap of 4 years before the second project is started. It was stated that it might be possible to finish the first project, carry out reinstatement and then for the second project to start. The NFU understands that this could mean that the haul road and the compounds could be set up and reinstated after the first project and then constructed and set out again for the second project. The NFU is concerned that there are too many variables, and a question was raised that it could take both projects up to 11 years to build if the sequential scenario is followed. A construction phase of 11 years is too long and the impact on landowners and occupiers will	The Applicants can confirm that the construction compounds identified as Work No (18A18B) on the Works Plans (AS-014 and AS-015), along the onshore export cable corridor and 400kV grid connection cable corridor have been identified as either for Project A – 'Morgan' or Project B – 'Morecambe', meaning only one Project has sought the necessary rights to be able to utilise these areas. This therefore means that there would not be a scenario where the compound is constructed, reinstated after the first project and then constructed again by the second project. Similarly with the haul roads, the temporary width of the onshore export cable corridor and 400kV grid connection corridor has been designed to allow for two haul roads, one for Morgan and one for Morecambe. Therefore, similarly to the compounds there would not be a scenario where they are constructed and subsequently reinstated by the first project and then constructed again by the second project.

Reference	Written Representation Comment	Applicants' response
	<p>be far too great. It is essential that Morgan and Morecambe should not be given the flexibility to build out separately with a 4-year gap.</p> <p>How is the preferred scenario decided: The NFU understands that Morgan and Morecambe are separate projects and have separate ownership as was stated at the hearing. We also understand that Morgan and Morecambe are doing something different by working together and submitting one application for a DCO for both projects. The Applicant at the hearing stated that they need all Build Out/Construction Scenarios applied for within the application and as set out above the worst-case scenario could be sequential with a 4-year gap between projects. The NFU believes that the best case scenario must be taken forward by Morgan and Morecambe which would reduce the construction time so reduce the impact on landowners and farmers. Therefore, it is really important that measures are included within the DCO that will make sure and compel Morgan and Morecambe to take the preferred scenario forward which has a single construction phase which is concurrent if both projects go ahead.</p> <p>As stated at the hearing the only co-ordination so far by Morgan and Morecambe are submitting one application for both projects otherwise, they are not coordinating in any way to build the projects concurrently. Landowners could end up with double the impact in the same location on the farm, there needs to be a shared approach to trenches and cabling, further co-ordination is essential and the DCO should not be approved unless Morgan and Morecambe can show how they will do this and that a sequential buildout would be a last resort.</p>	<p>The Applicants refer the National Farmers Union to Section 8 of the Applicants' Response to Hearing Action Point ISH1_28 (REP1-039) which explains in detail why Morgan and Morecambe cannot commit to concurrent construction of the Transmission Assets.</p>

Reference	Written Representation Comment	Applicants' response
REP1-185 185.5	Link Boxes <p>It is understood that link boxes will be required. The NFU and LIG have been seeking clarification on how the link boxes will be configured and located within fields and what could be the worst-case scenario. Link boxes do stand proud above ground level and so greatly interfere with agricultural operations and are a hazard to farm machinery. As requested at the hearing it is essential to have a sketch design of what could be the worst-case scenario for the location and siting of link boxes between both projects. Landowners really need to be able to see a sketch design and a photomontage so that they can understand what the link boxes will look like and where they could be located. This has not yet been forthcoming in the voluntary negotiations and is not clearly shown in the 'Project Description' document. The preference is that all link boxes are located within field boundaries so that the impact on day-to-day agricultural operations within fields is kept to an absolute minimum.</p>	<p>The Applicants refer to their response PDA-040 040.2 (REP1-061) in relation to the impact on agricultural land and operations. Post consent and following detailed design, the Applicants will be able to advise on the location of link boxes however the detail is not currently available as detailed design has not been undertaken as is the case with all projects of this type. As set out in Volume 1, Chapter 3: Project Description (APP-024), link boxes are typically located adjacent to the joint bay locations; they comprise concrete chambers with a manhole cover set at ground level, and not proud above ground level, to provide access during the operation and maintenance phase. Access to link boxes is anticipated to be required on an annual basis for routine inspection, for example to check on condition and water egress." (paragraph 3.15.2.11).</p>
REP1-185 185.6	Field Drainage <p>The NFU raised an issue over future field drainage requirements, where new field drainage may need to be installed in a field in 40/50 years time and whether it would be possible to cross the cables to get to an outfall. The NFU understands that for anything below 0.6m for normal agricultural operations consent must be sought but a solution will need to be thought about and provided during construction otherwise the developer/owner of the site in 50 years' time will not give consent. This has yet to be clarified by the Applicant.</p>	<p>The Applicants refer to the ISH1_47 OF S_D1_5 The Applicants' response to Hearing Action Points due at Deadline 1 - Rev F01 (REP1-037).</p> <p>If future drainage is required to be installed during the operational lifetime of the project, the landowner or occupier of the land at the time would be required to engage with the OFTO or managing organisation regarding the installation of the drainage to obtain their consent who would act reasonably in granting consent in accordance with the rights sought within the Menu of Rights (REP1-014). This is normal practice for other buried utilities to ensure the protection of the cables and the safety of those farming the land.</p>
REP1-185 185.7	Rights in perpetuity	<p>The Applicants refer to their response PDA-040 040.2 (REP1-061).</p>

Reference	Written Representation Comment	Applicants' response
	<p>Land and Rights Proposed are Necessary and Proportionate: Rights in perpetuity: Whether the Secretary of State could be satisfied that the rights proposed to be acquired are no more than is reasonably necessary and proportionate for the purposes of the proposed development. Under the voluntary negotiations within the heads of terms the Applicant is not prepared to agree to a time limited easement. To seek permanent rights over land in order to deliver a Project that has a limited duration exceeds what is reasonably required and amounts to a disproportionate interference with the rights of the landowners. The Project has a limited duration only and the Applicant confirmed that the life of the wind farm is approximately 35 years.</p> <p>The Applicant has not provided any justification to the NFU or LIG as to why the rights needed with landowners is needed for more than 99 years. Should the applicant need to extend the Term this should be undertaken through negotiations as would be the case with other affected stakeholders.</p> <p>A time limited easement of 99 years has been agreed in voluntary negotiations with other developers of offshore wind farms where underground cables are required and so the NFU does not understand why Applicants for both Morgan and Morecambe will not agree to this.</p>	
REP1-185 185.8	<p>Construction Scenarios</p> <p>The NFU and Richard Furnival a land agent acting for affected landowners, raised again the issues over the time period of 11 years as the maximum build time and the construction works should be carried out simultaneously and not independently and that the impact of building both schemes independently at different times was disproportionate and not in the public interest. As stated</p>	<p>The Applicants have provided the indicative programme showing the sequential construction with a 4 year gap below in Appendix B – Applicants' response to ISH-24 (REP1-037) and responded to this within Hearing Action Point in document Applicants response to Hearing Action Points: ISH1 6, 8, 9, 19, 26 & 28 (REP1-039).</p>

Reference	Written Representation Comment	Applicants' response
	above, the NFU believes that this needs to be addressed before any DCO is granted.	

2.23 Renesola Hercules Energy 2 Limited

Table 2.23: REP1-192 – Renesola Hercules Energy 2 Limited

Reference	Written Representation Comment	Applicants' response
REP1-192 192.1	<p>Introduction</p> <p>1.1 Walker Morris LLP is instructed by Renesola Hercules Energy 2 Limited (Renesola) to submit written representations (WR) in relation to the DCO application submitted by the Applicants for consent for transmission assets associated with the Morgan Offshore Wind Project and the Morecambe Offshore Windfarm.</p> <p>1.2 Renesola has an interest in land included in the Order Limits of the DCO Proposal. In that regard, Renesola has a significant interest in the outcome of the DCO Proposal.</p> <p>1.3 The proposed Order Limits of the DCO Proposal overlap with land over which Renesola proposes to bring forward its own significant renewable energy development (comprising a ground mounted solar PV generating station with an installed capacity of up to 49.9 MW AC and a battery energy storage system with a capacity of approximately 40 MW AC (Renesola Project)).</p>	<p>The Applicants acknowledge and note the written representation submitted on behalf of Renesola Hercules Energy 2 Limited (Renesola).</p> <p>The Applicants are aware of Renesola's proposed development which would, if a planning application is made and granted, be located within the Order Limits and thank Renesola for their continued engagement.</p>

Reference	Written Representation Comment	Applicants' response
	<p>1.4 Renesola has exchanged an option agreement to acquire the leasehold interest for a period of 42 years on the land the Renesola Project is proposed to come forward on. The option agreement is subject to planning permission being granted for Renesola's own project on the land, known as land at Great Carr, Lytham, Lancashire (Land).</p> <p>1.5 The DCO Proposal seeks to include rights of compulsory acquisition over the Land which will cause prejudice to the delivery and operation of the Renesola Project, and a significant compensation liability for the Applicants.</p>	
REP1-192 192.2	<p>Concerns</p> <p>2.1 Renesola's concerns relate to:</p> <p>2.1.1 The compulsory acquisition of land identified for the Renesola Project;</p> <p>(a) namely the extent of the rights sought by the Applicants are not proportionate and fail to meet the relevant tests in S122 of the Planning Act 2008.</p> <p>2.1.2 a lack of consideration of alternatives considered by the Applicants to ensure that both projects can co-exist;</p> <p>(a) the Applicants have failed to consider 'all reasonable alternatives' to compulsory acquisition.</p> <p>2.1.3 a lack of adequate engagement from the Applicants;</p> <p>(a) the Applicants have been aware of the Renesola Project since prior to submission of the DCO Proposal, but have failed to adequately engage with Renesola.</p>	<p>The Applicants note the points of concern raised by Renesola and have addressed these in the response below.</p>

Reference	Written Representation Comment	Applicants' response
	<p>2.1.4 the deliverability of both the DCO Proposal and the Renesola Project.</p> <p>(a) Renesola consider it feasible for both projects to come forward, but a change in approach to compulsory acquisition and meaningful engagement on alternatives is needed from the Applicants.</p> <p>(b) Renesola has provided a range of solutions to the Applicant that would enable both projects to co-exist. The Applicant has not engaged with Renesola to explore available solutions with a view to reaching agreement.</p> <p>2.2 Renesola would welcome the opportunity for meaningful engagement with the Applicants to establish a mutually beneficial route to delivery of both the DCO Proposal and the Renesola Project.</p> <p>2.3 In the absence of any meaningful engagement or agreement, Renesola intends to progress with its Project.</p>	
REP1-192 192.3	<p>Introduction</p> <p>1.1 Walker Morris LLP is instructed by Renesola Hercules Energy 2 Limited (Renesola) to submit written representations (WR) in relation to the DCO application submitted by the Applicants for consent for transmission assets associated with the Morgan Offshore Wind Project and the Morecambe Offshore Windfarm including: offshore export cables, onshore landfall infrastructure, onshore export cables, onshore substations, onshore grid connection cables and circuit breaker compounds, and other related onshore infrastructure (DCO Proposal).</p>	Please see Applicant's response to REP1-192.192.1 above.

Reference	Written Representation Comment	Applicants' response
	<p>1.2 This WR is in addition to, and not in place of, the contents of the relevant representations previously submitted, dated 24 January 2025.</p> <p>1.3 Renesola is a special purpose vehicle owned by Hercules Energy Limited, which is a joint venture between Renesola Power and Novergy. Novergy has one of the strongest track records in the UK Solar PV sector with direct involvement in over 1GW of large-scale solar projects. Renesola Power is a leading global renewable energy project developer and operator and has a presence in 9 countries across Europe, North America, and Asia. It generates and supplies clean electricity through the operation of 253MW of renewable assets worldwide, including a 50MW PV plant in England. As such, Renesola is well placed to deliver on its proposals.</p> <p>1.4 Renesola has an interest in land included in the Order Limits of the DCO Proposal. In that regard, Renesola has a significant interest in the outcome of the DCO Proposal. The proposed Order Limits of the DCO Proposal overlap with land over which Renesola proposes to bring forward its own renewable energy development. This includes land which Renesola has exchanged an option agreement to acquire the leasehold interest for a period of 42 years¹, subject to planning permission being granted for Renesola's own project on the land, known as land at Great Carr, Lytham, Lancashire (Land).</p> <p>1.5 This WR is based on a current understanding of the information within the DCO Proposal as of the date of this WR. Renesola's position may change and/or be supplemented as the Examination process progresses – particularly should there be any meaningful engagement with the Applicants on the fundamental points of concern noted below.</p>	

Reference	Written Representation Comment	Applicants' response
	1.6 The overlap of the two schemes is shown on Plan 2, with the area edged yellow being the Land2 .	
REP1-192 192.4	<p>Renesola's Project</p> <p>2.1 The Renesola project comprises a ground mounted solar PV generating station with an installed capacity of up to 49.9 MW AC and a battery energy storage system (BESS) with a capacity of approximately 40 MW AC (Renesola Project). The project is designed to operate for 40 years and is targeted for completion by 2027/28, subject to the grant of planning permission by Fylde Borough Council.</p> <p>2.2 The Land, totalling approximately 65.5 hectares, is divided into:</p> <p>2.2.1 A western parcel (2.5 hectares) for the BESS and associated infrastructure; and</p> <p>2.2.2 An eastern parcel (62 hectares) which will house the main part of the Renesola Project.</p> <p>2.3 Renesola has engaged in formal pre-application process with Fylde Borough Council and intends to submit a full planning application for the Renesola Project – with a target of 2027/28 for the Renesola Project to be operational.</p>	<p>The Applicants acknowledge and note the summary of the Renesola project. The Applicants note that no planning application has yet been submitted for the Renesola project. It was therefore not possible for the Applicants to account for the Renesola project when preparing the Transmission Assets DCO Application and refining the pre-application design, on the basis that there was (and is) no information in the public domain. Further, Renesola did not have an interest in land until September 2024, which was shortly before submission of the DCO Application for the Transmission Assets and after the statutory consultation which took place between Thursday 12 October and Thursday 23 November 2023. The Applicants would note that Renesola made the decision to acquire an interest in the land when information regarding the Transmission Assets was publicly available.</p> <p>The Applicants note the lack of specific information and detail in the Renesola representation which is understandable given the early stages of the development proposal.</p>
REP1-192 192.5	<p>Concerns</p> <p>3.1 Renesola's principal points of concern are largely grounded upon linked issues regarding:</p> <p>3.1.1 compulsory acquisition of land identified for the Renesola Project;</p>	<p>The Applicants note the general points of concern raised by Renesola and have addressed these in the response below.</p> <p>The Applicants acknowledge and agree with Renesola's reference to NPSS EN-1 and EN-5 being of particular importance to the Secretary of States' decision making process.</p>

Reference	Written Representation Comment	Applicants' response
	<p>3.1.2 a lack of consideration of alternatives considered by the Applicants to ensure that both projects can co-exist; 3.1.3 a lack of engagement from the Applicants; and 3.1.4 the deliverability of both the DCO Proposal and the Renesola Project.</p> <p>3.2 Section 104 of the Planning Act 2008 establishes that in determining a DCO application the Secretary of State is to consider, amongst other things, any relevant National Policy Statement (NPS) which is an effect in relation to development of the description to which the application relates, and any matters which the Secretary of State thinks are both important and relevant to the Secretary of State's decision.</p> <p>3.3 Given the nature of the DCO Proposal, we consider NPS EN-1 (the overarching NPS for energy) (EN1) and NPS EN-5 (the NPS for electricity networks infrastructure) (EN5) to be of particular importance to the decision-making process.</p>	
REP1-192 192.6	<p>Compulsory Acquisition</p> <p>3.4 The following table illustrates the plots listed in the Applicants' Book of Reference that are also required for the Renesola Project. Annex 2 shows the DCO Order Limits with the Land overlayed edged yellow.</p> <p>3.5 S122 of the Planning Act 2008 confirms that a DCO can only authorise compulsory acquisition of land where the Secretary of State is satisfied that the following have been met:</p> <p>3.5.1 The land is:</p> <p>(a) required for the development to which the DCO relates;</p>	<p>The Applicants acknowledge the potential for overlap between the Renesola project and land over which compulsory acquisition powers have been sought to deliver the Transmission Assets.</p> <p>The Applicants maintain that the temporary possession and compulsory acquisition powers which are sought in order to deliver the Transmission Assets are entirely proportionate, justified and are necessary in order to deliver the Transmission Assets.</p> <p>The Applicant's justification for the inclusion of compulsory acquisition powers and an explanation as to why this is in the public interest is set out</p>

Reference	Written Representation Comment	Applicants' response
	<p>(b) required to facilitate or is incidental to the development; or</p> <p>(c) replacement land is to be given in exchange for common or open space land to be compulsory acquired; and</p> <p>3.5.2 There is a compelling case in the public interest for the land to be acquired compulsorily.</p> <p>3.6 The Applicants are also required to establish that they propose to acquire no more land or interests than are absolutely required in relation to the DCO Proposal, and that they have taken a proportionate approach to the acquisition of interests.</p> <p>3.7 As set out in the table above, the Applicants are seeking a vast amount of rights, both permanent and temporary, over the Land.</p> <p>3.8 The rights sought are fundamentally disproportionate and the extent of the same has not been justified or fully explained to Renesola by the Applicants.</p> <p>3.9 The Applicants have been aware of the Renesola Project for some time and have failed to take Renesola's interests into account when designing the DCO Proposal.</p> <p>3.10 If a more meaningful approach to site assembly and acquisition of rights had been taken by the Applicants, both the DCO Proposal and the Renesola Project could co-exist without the DCO Proposal causing prejudice to the Renesola Project.</p> <p>3.11 Renesola's position, which has been shared with the Applicants, is that it is possible for the DCO Proposal to come forward with a more streamlined approach to compulsory acquisition being taken, which could mitigate the conflict between the DCO Proposal and the Renesola Project.</p>	<p>within the Statement of Reasons (REP1-012), noting that paragraph 1.6.1.15 states these would only be used where interests in land cannot be acquired through voluntary agreement. The Applicants therefore maintain that they have met the test at section 122 of the Planning Act 2008 (as set out in sections 1.6 and 1.7 of the Statement of Reasons (REP1-012). The Applicants further explained their compulsory acquisition strategy during the compulsory acquisition hearings (see REP1-036).</p> <p>As set out in the Applicants' response to Renesola's relevant representation (see Table 2.94 of PDA-007), Renesola did not have an interest in land until September 2024 which was after the close of the initial statutory consultation on the Preliminary Environmental Information Report (PEIR) and accompanying documents, which took place between Thursday 12 October and Thursday 23 November 2023. The Applicants would note that Renesola made the decision to acquire the land when information regarding the Projects was publicly available. Renesola were not identified prior to this due to their interest not being confirmed by the landowner or registered at HMLR. The request for an EIA screening opinion (Fylde Council: 24/0716) for the Renesola proposed development was not validated until 18th December 2024, after the Application for the Transmission Assets was both submitted (21st October 2024) and accepted for examination (18 November 2024) - Renesola would therefore have been aware of the Transmission Assets Application at the point of preparing and submitting their EIA screening request to Fylde Council.</p> <p>Prior to submission of the DCO Application for the Transmission Assets, it was therefore not possible for the Applicants to account for the Renesola project, on the basis that the Applicants were not aware of Renesola's potential interest in the land or of any detail regarding the Renesola project proposals.</p> <p>The Applicants note the intention from Renesola that their project would be operational by the time the Transmission Assets come forward, however the</p>

Reference	Written Representation Comment	Applicants' response
	<p>3.12 The Applicants have failed to engage on this possibility to date and have taken an unduly heavy handed and disproportionate approach to compulsory acquisition.</p> <p>3.13 There is no compelling case in the public interest to justify the interference with private property rights in respect of the Land (and even more so to the extent as set out in the table above), and no such case has been sufficiently put forward by the Applicants.</p> <p>3.14 Renesola is a keen funded developer with tangible plans to develop the Land in a sustainable manner and to deliver much needed renewable energy infrastructure.</p> <p>3.15 The Land would be blighted as a result of the DCO Proposals and delivery of the Renesola Project frustrated.</p> <p>3.16 However, there is potential opportunity for both projects to be delivered. Although, the current proposed use of compulsory acquisition powers is too heavy handed and negates that potential, and as such should be rejected in its current form.</p> <p>3.17 As set out above, the Renesola Project is an important renewables project that will utilise the Land which Renesola already has an interest in and is ready and willing to start construction once planning permission is granted.</p> <p>3.18 The Renesola Project is expected to be operative by the time the DCO is made (should the DCO Proposal be successful) and as such it would not be rational or justified for the Land to be subject to compulsory acquisition, particularly in the form currently proposed. Rather, the Applicants should engage with Renesola to consider a mutually beneficial route forward, which removes or significantly reduces the compulsory acquisition powers sought in respect of the Land.</p>	<p>Applicants would note that this is subject to Renesola successfully submitting and obtaining planning permission for their proposals, along with discharging any planning conditions and implementing the consent if granted.</p> <p>The Applicants thank Renesola for their acknowledgement that there is opportunity for both projects to be delivered. The Applicants met with Novergy who have an interest in Renesola Hercules Energy 2 Limited on 18 September 2024 followed by a meeting with Renesola Hercules Energy 2 Limited and their legal representatives on 20 November 2024 to discuss potential interactions between the Transmission Assets and the proposed Renesola development. The Applicants issued a Section 56 notice to Renesola on 10th December 2024 to reflect their interest in land as beneficiary for Linda Rigby and Thomas Flack granted by an option for lease. The Applicants remain committed to engaging with Renesola Hercules Energy 2 Limited alongside the examination phase.</p>

Reference	Written Representation Comment	Applicants' response
	3.19 The reliance on the use of compulsory acquisition powers will also result in a significant compensation liability for the Applicants. This could, and should, be avoided given the genuine scope for delivery of both the DCO Proposal and Renesola Project.	
REP1-192 192.7	<p>Alternatives</p> <p>3.20 The guidance on the pre-application stage for Nationally Significant Infrastructure Projects clearly states that "there are particular occasions in the NSIP consenting process where alternatives to the proposed development must be examined as required by legislation. For example, to meet the requirements of the EIA Regulations 2017, and where compulsory acquisition of land is sought by the applicant it should be able to demonstrate that reasonable alternatives to compulsory acquisition of the precise parcels of land have been explored."</p> <p>3.21 The Compulsory Acquisition Guidance⁶ establishes that the Applicants must show that they have considered 'all reasonable alternatives' to compulsory acquisition, both in the form of voluntary agreements but also in terms of alternative locations for the project which may have less impact on private rights. The Guidance goes on to state that the Applicants will also need to demonstrate they the proposed interference with the right of those with an interest in the land is for a legitimate purpose, and that it is necessary and proportionate.</p> <p>3.22 It is not clear precisely what alternative sites have been considered to avoid the use of compulsory acquisition powers over the Land. It is clear that 'all reasonable alternatives' have not been considered, as it</p>	<p>The Applicants maintain they have complied with the Compulsory Acquisition Guidance and have considered all reasonable alternatives to compulsory acquisition which is set out in their response to Hearing Action Point CAH1_2 (REP1-037).</p> <p>The Applicants have accounted for all potential compensation which may be due further to the exercise of compulsory acquisition powers, which is supported by the Statement of Reasons (REP1-012) and the Funding Statement (APP-008).</p> <p>The Applicants refer to their response to REP1-192.192.6 above, which sets out the correspondence with the owners of the land and engagement taken place with Renesola from an early stage in the application process for the Transmission Assets.</p>

Reference	Written Representation Comment	Applicants' response
	<p>would seem reasonably possible for the Land to be bypassed or otherwise agreement sought between the Applicants and the owners of the Land. The corridor included in the Order Limits is vast, and there has been no engagement by the Applicants to consider how the Order Limits could be limited so as not to cause a detrimental impact on the Renesola Project, or otherwise how the Land might be bypassed.</p> <p>3.23 In the event powers of compulsory acquisition were to be exercised in respect of the Land, Renesola would have a significant claim for compensation, including but not limited to:</p> <p>3.23.1 market value of development land lost;</p> <p>3.23.2 severance and depreciation of retained development land, including potential (extensive) delay in the Site being brought forward for development due to the DCO Proposal being incompatible with the Renesola Project and associated costs and losses; and</p> <p>3.23.3 extensive development costs relating to losses caused, including holding costs and Professional Fees.</p> <p>3.24 It is therefore vital that any optioneering, feasibility appraisals and cost budgets fully factor in both the planning harm that would be caused and this significant compensation liability.</p>	
REP1-192 192.8	<p>Lack of Engagement</p> <p>3.25 The Applicants were aware of the Renesola Project prior to submission of the DCO Proposal, and failed to adequately engage to ensure the impacts of the DCO Proposal on the Renesola Project could be appropriately</p>	<p>Please see Applicant's response to REP1-192.192.6 above, where the Applicants have set out the dates when they were made aware of Renesola's interest in the land and their future proposals.</p>

Reference	Written Representation Comment	Applicants' response
	<p>mitigated. This is in flagrant disregard of the requirement of paragraph 4.1.19 of EN1, which strongly encourages early engagement between the applicant and 'those likely to have an interest in a proposed energy infrastructure application' (which Renesola clearly constitute</p> <p>.</p> <p>3.26 It is notable that discussions with the Applicants have been limited throughout the pre-application and examination period. The Applicants did send a S.56 letter on 10/12/2024 to Renesola (and the Applicants have now provided us with a copy of the same), but this was not received by Renesola at the time it was originally sent.</p> <p>3.27 There has been limited engagement with the Applicants in relation to the potential acquisition of the Land and rights by agreement in a way that could have the potential to minimise the effects of the DCO Proposal if it was to go ahead.</p> <p>3.28 Since the submission of Renesola's relevant representation on 24 January 2025, there has been no further engagement from the Applicants. This is despite the previous representations clearly establishing scope for both projects to come forward and Renesola being clear as to its desire to engage meaningfully.</p>	
REP1-192 192.9	3.29 Paragraph 2.13.9 of EN5 states that: "Co-ordinated transmission proposals, including multi-purpose interconnectors, are expected to reduce the overall environmental and community impacts associated with bringing offshore transmission onshore compared to an uncoordinated, radial approach. These reduced impacts	The Applicants note that pursuant to paragraph 2.13.9 of EN-5, the co-ordination between the projects has specifically resulted in one joint landfall site (rather than two separate sites) and one shared cable corridor. The Applicants would refer Renesola to their Deadline 1 submission, which sets out compliance with the NPSs in respect of co-ordination:

Reference	Written Representation Comment	Applicants' response
	<p>could, for example, relate to: fewer landing sites and reduced landfall impacts; reduced overall cable length and impacts; and fewer cable corridors and reduced impacts from these."</p> <p>Paragraph 2.13.13 states: "Applicants are expected to be able to indicate how co-ordination including reduction in impacts have been considered drawing on work of others"</p> <p>The uncoordinated and unengaged approach currently being adopted by the Applicants is not in accordance with the requirements of the above and has ultimately led to the conflict with the Land. Such conflict can, and should, be avoided by the Applicants opening a dialogue with Renesola to negotiate an acceptable compromise to the current proposals.</p> <p>3.30 Renesola is not being obstructive and recognises that there is likely to be an opportunity for both the DCO Proposal and the Renesola Project to come forward in a manner that is acceptable to all parties. Renesola is willing to engage in a meaningful way with the Applicants to consider and identify any such method of delivery – but this will require the DCO Proposals to change from their current form.</p>	<p>- S_D1_5.2 Annex 5.2 to the Applicants response to Hearing Action Points: ISH1 6, 8, 9, 19, 26 & 28 - Rev F01 (REP1-039)</p> <p>The Applicants maintain that the Transmission Assets are compliant with this policy.</p>
REP1-192 192.10	<p>Deliverability</p> <p>3.31 The overlap of the DCO Proposal and the Renesola Project poses a substantial and unjustifiable threat to the Renesola Project – itself a strategically important renewable energy project aligned with the Government's ambition renewable energy and climate goals.</p>	<p>The Applicants maintain that given the advanced stage of the Transmission Assets, and the fact that the Renesola project is in the pre-application phasestage, it would be possible for Renesola to avoid any Hillside issues through refinement of their draft proposals in order to account for the Transmission Assets. The Applicants emphasise that there is currently no certainty from a consenting process viewpoint that the Renesola project will be applied for, consented or delivered.</p>

Reference	Written Representation Comment	Applicants' response
	<p>3.32 The proposed compulsory acquisition could, at best, reduce the capacity of the Renesola Project by limiting the area available for solar panels. At worst it has the potential to render the Renesola Project unviable. This would result in a direct loss of renewable energy generation and the loss of investment in the local area – and the socio economic benefits that come with such an investment such as job creation (particularly during the construction phase). Given there are genuine alternatives that can be explored, any loss or reduction of the Renesola Project is completely irrational.</p> <p>3.33 If consented, the DCO Proposals could create possible Hillside issues as well as delivery issues, due to the lack of compatibility between the two projects as currently proposed. Even if robust Hillside provisions were included in the DCO to seek to protect the planning permission for Renesola's Project, there could still be the need for a significant re-plan of the scheme and a large proportion of this and any associated benefits would be lost. If a new planning permission was required there would be increased costs associated with delivery of biodiversity net gain and other associated development costs;</p> <p>3.34 There is no certainty that the DCO Proposal will be delivered, or when it will be operational (if consented). By contrast, the Renesola Project is anticipated to be completed and operative by 2027/28. Swift delivery of renewable projects is key to achieving the ambitions set by the Government. 3.35 Paragraph 2.3.3 of EN1 states the following: "Our objectives for the energy system are to</p>	<p>The Applicants note the concerns Renesola have raised with regards to potential Hillside issues. The Applicants note that Hillside issues would only arise in the event both the Transmission Assets and the Renesola project secure consents which are incompatible, and that consequently one of the projects is not capable of physical implementation.</p> <p>The Applicants understand that Renesola's project is at EIA screening stage and that no planning application has been submitted or pre-application consultation undertaken at the time of writing (refer to REP1-020). As noted by Renesola, it remains their intention to submit a planning application at some point in future. In the absence of detailed information about the proposals from Renesola, the Applicants consider that it is premature to determine whether or not there is potential for any Hillside incompatibility.</p> <p>The Applicants have amended Article 47 of the draft DCO (C1/F04) in order to appropriately address any potential Hillside incompatibility risk and ensure this wording is consistent with the latest Secretary of State approved drafting on this issue, in accordance with the Lower Thames Crossing DCO. These amendments are set out in the Schedule of Changes S_S51_2/F03.</p>

Reference	Written Representation Comment	Applicants' response
	<p>ensure our supply of energy always remains secure, reliable, affordable, and consistent with meeting our target to cut GHG emissions to net zero by 2050"</p> <p>It is at odds with this objective to permit the DCO Proposal in its current form when it has the potential to prejudice the Renesola Project in such a severe way. Rather, alternatives must be considered by both the Applicants and the Examining Authority.</p>	
REP1-192 192.11	<p>Summary</p> <p>4.1 Renesola's objections to the DCO Proposal, in its current form, are interlinked and relate to (1) compulsory acquisition, (2) alternatives, (3) lack of engagement, and (4) deliverability of both the DCO Proposal and the Renesola Project.</p> <p>4.2 Since the relevant representations stage, the Applicants have made no effort to engage with Renesola to resolve these outstanding issues – despite those representations expressly encouraging engagement to that effect.</p> <p>4.3 Renesola's position remains that both projects can be delivered, but change to the DCO Proposals is needed. In particular, Renesola requires engagement from the Applicants to establish an agreement that (i) regulates the manner in which rights over the Land are granted and the relevant works are carried out and (ii) confirms that compulsory acquisition powers will not be exercised in relation to the Land.</p> <p>4.4 Renesola would welcome the opportunity to meaningful engagement with the Applicants to establish a mutually beneficial route to delivery of both the DCO Proposal and the Renesola Project. The following are considered to be potentially viable alternatives:</p>	<p>The Applicants thank Renesola for their representation and refer to the responses above in respect of the key concerns raised.</p> <p>The Applicants welcome Renesola's confirmation at paragraph 4.5 that they intend to pursue their planning application, notwithstanding the DCO proposals. At paragraph 2.3 Renesola confirm that they are in the pre-application stage of development - the Applicants would hope that the certainty and level of detail provided in the Transmission Assets DCO Application will give a Renesola a sound basis on which to develop their proposals. The Applicants look forward to ongoing dialogue.</p>

Reference	Written Representation Comment	Applicants' response
	<p>4.4.1 Renesola has suggested that if it were to install solar panels on 'concrete shoes' within the DCO easement area this may be an acceptable solution. This would allow Renesola to temporarily remove the relevant solar panels, if requested by the Applicants, for management and maintenance purposes, although any consequential loss of revenue incurred by Renesola would need to be at the Applicant's cost; and/or</p> <p>4.4.2 It is otherwise suggested that the transmission assets and cables are sited overground (i.e. overhead lines) rather than underground.</p> <p>4.5 Renesola intends to proceed with pursuing its planning application for the Renesola Project notwithstanding the DCO Proposals.</p>	

2.24 Sheila Hall –

Table 2.24: REP1-200 – Sheila Hall

Reference	Written Representation Comment	Applicants' response
REP1-200 200.1	<p>I object to the project on a number of reasons which include:</p> <p>1. The original heads of terms which were sent on 8 November are yet to be agreed. They are not in a format that have been accepted by my appointed Land Agent and representative. The commercial terms have yet to be agreed therefore we object.</p>	<p>The Applicants note this is a repeat of the Relevant Representation submitted which the Applicant responded to RR-1584.1 – 1584.9 (PDA-007_). Updated Heads of Term for the land rights sought were issued to Ms Hall on 20th May 2025, the Applicants also met with Ms Hall's land agent on 29th May 2025 to discuss the terms and outstanding points of difference. The Applicants are hopeful that through the ongoing negotiations, any</p>

Reference	Written Representation Comment	Applicants' response
		outstanding points of difference can be resolved so the rights sought can be secured through the voluntary agreement.
REP1-200 200.2	2. The location and position of the proposed project will have huge negative affect on my land and my tenant's farming business – the proposed route of the cables effectively sterilise all of my land off Hillock Lane and Kirkham Road, the land is used to feed high yielding dairy cows and the land is vital for slurry management, the project goes straight through the land which means we lose the working area but also renders the land to the south unusable due to lack of access or useable area.	The Applicants refer to their response RR-1584.2 (PDA-007) which responds to the points raised.
REP1-200 200.3	3. I object to the plans submitted and the operation accesses as proposed on my land off Hillock lane as this impacts day to day farm management and creates potential health and safety issues with livestock present, it also weakens the security of the land which I regard very highly. The operational access can all be gained from Kirkham Road direct onto the Easement which is a public adopted highway.	The Applicants refer to their response RR-1584.3 (PDA-007) regarding the operational access.
REP1-200 200.4	4. I object to the plans highlighting the damage and destruction of an amenity pond within my land. This is a wildlife haven which we have created and is important feature of the landscape.	The Applicants refer to their response RR-1584.4 (PDA-007) referring the impact on the pond within the land.
REP1-200 200.5	5. I object to the project on the location of the cable route and easement. My land is within development boundaries and there has been significant linear development along Kirkham Road. My land would be sterilised by the cable easement.	The Applicants refer to their response RR-1584.5 (PDA-007) regarding the sterilisation of the land.
REP1-200 200.6	6. There are various documents that we object to due to the lack of information provided for this specific area –	The Applicants refer to their response RR-1584.6, 1584.7 and 1584.8 (PDA-007) in relation to the outline management plans submitted with the application

Reference	Written Representation Comment	Applicants' response
	<p>these are just standard documents that do not address the conditions of this specific location and area which include</p> <p>a) APP-193 (J1) Code of Construction Practice</p> <p>b) APP-203 J1.10 Outline Construction Plan</p> <p>We object to the Outline Construction Fencing, there is not the full details of all fencing, the materials and detailed specification is required at this stage. The wording relating to the fencing of the working width is inadequate to cover full security and to minimise affected parties to include fencing of crossing points.</p> <p>c) APP-202 J1.9 Surface and Groundwater Management Plan</p> <p>We object to the proposals and measures to control water run-off from the working width. No discharge of any water from the working width should be released on any adjoining land. Full detailed drainage matters need to be addressed.</p> <p>d) APP-200 J.1.7 Outline Soil Management Plan</p> <p>We object to the submission of the Outline Soil Management Plan which formed part of the outline Code of Construction Practice (CoCP). The Outline Soil Management Plan which has been submitted on behalf of the Project is not specific to the area and the route between Penwortham and Blackpool. It is not site specific and does not deal with the variants of the soil structures within the proposed route. We object to the responsibility of the implementation of the Soil Management Plan being delivered by the principal contractor and the Agricultural Liaison Officer (ALO). This must be underpinned by the Project. Section 1.7.2 Soil Stripping – it identifies that it will be recorded by the ALO prior to commencement of any construction. This does not deal with any point of</p>	

Reference	Written Representation Comment	Applicants' response
	discussion or input by the affected parties such as myself and essential information that has been suggested does not fully complete the evidence of the soil quality	
REP1-200 200.7	5. I have serious concerns with regard to the project, There is no certainty offered by either Morgan or Morecambe that they will develop the project, simultaneously if granted, therefore if the SOS allow this then construction of this project could last in excess of 7 years which is just not acceptable or via for my business. Timing and controls have to be issued by the SoS	The Applicants refer to their response RR-1584.9 (PDA-007).
REP1-200 200.8	6. The operational access as shown from Hillock lane is unnecessary, I have had no input into this and object strongly, it creates a health and safety issue and impacts on the security of my land.	The Applicants have sought to use existing field entrances and access points operational access wherever possible to reduce the impact on the holding. Section 3.18 4 of Volume 1, Chapter 3: Project Description (AS-024), explains that operations and maintenance activities for the onshore export cables would comprise a small number of visits a year and would typically be completed using a Light Goods Vehicle or other 4x4 or multi-terrain vehicle. Activities are therefore expected to be minimal and as such the Applicants do not envisage this will have an impact on day to day farm management. Regarding security of the land, this will be addressed through the voluntary land agreements in which the Applicants expect to incorporate a suitable notice provision regarding the use of the operational access.
REP1-200 200.9	6. We wish to be present or our land agent present at the walk over inspection Therefore, until all these queries and have been fully answered and dealt with appropriately for our land, we object to the scheme/project.	The Applicants note the request.

2.25 Sheila Hall

Table 2.25: REP1-201 – Sheila Hall

Reference	Written Representation Comment	Applicants' response
REP1-201 201.1	<p>Thank you for the opportunity to raise my comments and concerns on the proposed Morgan & Morecambe projects. The points I wish to raise are:</p> <p>Design & Delivery Resourcing</p> <p>If the Morgan & Morecambe projects are approved there needs to be a requirement placed on the projects to staff the project teams with people with the relevant experience and to use appropriate processes to ensure that both the short term and long-term damage to farmland and the wider environment is minimised. It is essential that it isn't just that the project documents say they will do what is necessary but that they actually do what is required and do it properly. This requires the project teams to include people with the appropriate experience and understanding of the work required and the environments involved to both develop the plans and do the actual work, with a suitable oversight process in place to check the projects do what they have committed to. As an example, the project teams need to include people with the relevant experience and understanding of repairing and reinstating land drains to do the drainage work and also for there to be a review process that checks that it is done correctly. Sadly, the experience so far is that the project does not always deliver on what their own documents say. I don't know whether that has been due to not having people with the right knowledge and experience or trying to save money. I am concerned that if the approach the project has adopted so far is allowed to continue in the future there will be</p>	<p>The Applicants note the concern raised. Section 1.4 of the Code of Construction Practice (APP-193) identifies the roles and responsibilities of the various parties during the construction phase. Suitably qualified people will be required to meet these obligations. In addition, the Construction (Design and Management) (CDM) Regulations 2015 identify the legal duties, responsibilities and obligations of all the major roles within the construction team. Adherence to these obligations are secured through Requirement 8 within Schedules 2A and 2B in the Draft Development Consent Order (AS-004) which requires the Applicants to prepare detailed Code(s) of Construction Practice in accordance with the outline Code of Construction Practice (APP-193) and any outline management plans appended to it (APP-194 - APP-207).</p> <p>The Applicants have instructed a land drainage contractor and issued a land drainage questionnaire in November 2024 to start gathering information on the land drainage systems currently in place. The purpose of this being to gather information to aid with pre construction land drainage. The Applicants have committed to reinstate drainage outfalls that are damaged, this commitment is captured within CoT39 (APP-193).</p>

Reference	Written Representation Comment	Applicants' response
	severe and long-lasting damage to the land and environment that could otherwise be avoided.	
REP1-201 201.2	<p>Design Parameters</p> <p>It is very concerning that the applicants are asking for the DCO to be granted without committing to minimum and maximum design parameters on all the key parameters that will have fundamental long-lasting impacts on the environment and local communities. One specific example of this is the design parameters for the cable depths should be specified and not "indicative". The depth of the cables is a critical parameter for agricultural land as the depth of cables impacts the ability to reinstate and maintain land drains that are essential to the management of agricultural land. Failure to ensure the cables are deep enough will make it impossible to restore the land to the same condition and will likely render it impossible to continue to farm in the same way. Given the applicants are justifying the TP on grounds it will be returned to agricultural usage the minimum and maximum cable depths must be specified. The DCO should also include a commitment for the applicants to work within each limit in the DCO.</p>	<p>The Applicant has followed the industry standard approach of adopting a Maximum Design Scenario (MDS) for the proposed construction and development. This Maximum Design Scenario has been applied for each impact assessment, in order to ensure a robust assessment in considering the worst-case scenario for each assessment topic. At the request of the Examining Authority the Applicants have provided further clarity on construction scenarios and the assessment of impacts within the response to the Rule 9 letter submitted on 21st March 2025: Rule 9 – ES assessment of Construction Scenarios (AS-070). AS070 clarifies that for many of the impacts assessed concurrent construction represents the worst case and it is therefore an oversimplification to assert that where the projects run to different timescales (i.e. during sequential construction), this will double the disruption and environmental impacts. AS-070 sets out the worst-case construction scenario for each topic assessment chapter on an impact by-impact basis.</p> <p>The burial depth of the onshore cable will be informed by site specific information, including ground condition surveys, where required, to ensure that cable installations are appropriately designed, following consent during detailed design. The indicative target depth of the onshore export cable is 1.8m to the bottom of the trench and 1.2m to the top of the protective tile (see Table 3.19 of Volume 1, Chapter 3: Project description (AS-024). This is also reflected within the voluntary heads of terms for the land rights sought.</p> <p>It should be noted that this is deeper than industry standard guidelines set out in Energy Networks Association, Engineering Recommendation G57, issue 2 2019 which stipulates at least 0.9 metres of depth to the protective tile for transmission assets in good agricultural land, save for specific individual locations.</p>
REP1-201 201.3	<p>Sequential Delivery</p> <p>Sequential delivery of the proposed projects means the impact on road links, environment, communities and</p>	<p>The Applicants refer to ISH1_23 and ISH1_24 within S_D1_5 The Applicants' response to Hearing Action Points due at Deadline 1- Rev F01 (REP1-037) and S_D1_5.2 Annex 5.2 to the Applicants response to Hearing Action Points: ISH1 6, 8, 9, 19, 26 & 28 - Rev F01 (REP1-039) which explains in</p>

Reference	Written Representation Comment	Applicants' response
	businesses will be protracted for up to 10 years. Many roads and plots of land are impacted by the construction activity, construction traffic and compounds for both projects and will therefore be significantly disrupted for up to 10. There are many fields along the cable corridor that are impacted by the compounds, haul roads and cable trenches for both projects. So, for many farms there will a significant proportion of the farm land that will be out of production and unavailable to be farmed for the duration of both projects, so potentially over 10 years after allowing for reinstatement work and the land recovering. This fundamentally undermines the viability of continuing the operate the farm business even if the land can be restored to viable agricultural land after all the construction is completed. As a significant amount of the farm land in the Fylde is impacted there will be shortage of silage and grazing in the area so there will be consequences for many more farm businesses than just the land subject to the CA and TP orders. During Open Floor Hearing 1 (OFH1) and Issue Specific Hearing 1 (ISH1) the applicants placed great emphasis on the benefits that had arisen so far from the two projects working as a joint project. There is no benefit to the local communities and businesses if the design, construction or ongoing maintenance phases of the projects do not operate as a joint project with concurrent activity. The DCO should include a commitment to concurrent and coordinated development and construction phases to reduce the impact on the local communities, businesses and environment.	detail why Morgan and Morecambe cannot commit to concurrent construction.
REP1-201 201.4	Alternative Route At the OH1 and ISH1 details were raised of a materially alternative route that would have significantly less impact on the environment and communities, be cheaper to deliver and be consistent with the development plans for	In regards to the alternative route, the Applicants refer to paragraphs 2.31 of The Applicants' Response to Relevant Representations Part 1 – Introduction and thematic responses (PDA-006) and The Applicants have responded to this Hearing Action Point in document submitted at Deadline 1: Applicants response to Hearing Action Points: ISH1 6, 8, 9, 19, 26 & 28 (REP1-039).

Reference	Written Representation Comment	Applicants' response
	<p>the Hillhouse site. Is it reasonable that the DCO is put forward for consent and that CA and TP orders are sought when the alternative route has not been assessed? The project teams clearly feel they are committed to the current proposed route because they have invested 3 years work into it. Given the scale of the impact on the environment and communities in the scope area it is essential that time is taken at this stage to properly consider this alternative with further engagement with National Grid. Funding Statement I am concerned by the uncertainty around the identity & nature of the legal entities that will in the future be sponsoring the projects. Without the information being available how is it possible to carry out the necessary due diligence on the financial & counterparty risk that will be triggered by the DCO being granted? Will the DCO be subject to review by the Secretary of State on a change of control of the project companies?</p>	
REP1-201 201.5	<p>Timing of DCO application</p> <p>It is concerning that the applicants are pressing ahead with the DCO while there are material and significant issues outstanding.</p> <p>Is it reasonable that the DCO is put forward for consent and that CA and TP orders are sought when the materially alternative route has not been assessed?</p> <p>It does not seem sensible for the DCO for these projects to be considered before the National Grid plans for connecting in the additional power supplies from the new Wind Farms are confirmed. For example, these projects have a critical dependency on the Penwortham power Station, should the consent for the M&M projects not be given after the proposed extension of the Penwortham power station has been approved?</p>	<p>The Applicant refers to the above response REP1-201.4 and CAH1_9 and CAH1_10 of S_D1_5 The Applicants' response to Hearing Action Points due at Deadline 1-Rev F01 (REP1-037).</p> <p>The Applicants refer to their submission of S_D1_5.2 Annex 5.2 to the Applicants response to Hearing Action Points: ISH1 6, 8, 9, 19, 26 & 28 - Rev F01 (REP1-039) regarding the National Grid connection at Penwortham</p>

Reference	Written Representation Comment	Applicants' response
	Should the application for the DCO be paused until the identity, nature and financial strength of the firms that will behind the projects is known?	

2.26 John Forrester Limited on behalf of Tallentine Limited

Table 2.26: REP1-208 – John Forrester Limited on behalf of Tallentine Limited

Reference	Written Representation Comment	Applicants' response
REP1-208 208.1	<p>Tallentine Limited and de Hoghton Estate (20053958) – Morgan & Morecambe Offshore Wind Farm Development Consent Order Application Reference: EN020028</p> <p>We act as Agents for the Directors of Tallentine Limited and the Trustees of the de Hoghton Settled Estate - Lancashire Trust owners of Old Hall Farm, Lea, Preston, Title Nos. LAN183360, LAN136463 & LAN137796 extending approximately 62.5ha (154.44 acres) or thereabouts which will be affected by the Proposed Morgan and Morecambe Offshore Windfarm Development Consent Order (DCO). This representation is made pursuant to Section 56 of the Planning Act 2008 and in accordance with the Planning Inspectorate's Advice note 8.2.</p> <p>Our representations are set out as under:</p>	The Applicants note the response.
REP1-208 208.2	1. Clients Affected Land/Property.	The Applicants note the response and the extent of the land and current activities. To confirm neither the Grade I Listed Farmhouse nor the Grade II

Reference	Written Representation Comment	Applicants' response
	<p>1.1 Tallentine / de Hoghton Estate have been the freehold owner of the land referred to since the 1400's. The land is currently let on Farm Business Tenancy and is used for the grazing of cattle, arable and root crop production and is Grade II, highly productive land within a 'ring fenced' setting. The land is also subject to a shooting rights agreement.</p> <p>1.2 The land is to be directly impacted by the proposed onshore cable route, with associated easements extending to 831m and 1019m, a potential compulsory acquisition of 29.83 acres of land for 'Ecological Mitigation', and an additional 59.47 acres of the Saltmarsh to be occupied by way of a lease for Ecological Mitigation during the construction stages.</p> <p>1.3 The property includes a nationally important Grade I Listed Farmhouse (List Number 1361663) subject to a residential tenancy and separate No. 2 Grade II Listed Stable Block and Barn (List Numbers 1073511 & 1317477) together with yard areas and the other buildings, subject in part to an Agricultural Tenancy, which will be affected, where the construction traffic is proposed to access the Yard areas at Lea Old Hall Farm. The access route proposed is through a tight 90 degree bend passing directly to the south of the Stable Block. The heavy equipment presents a risk of damage through impact and vibration to the buildings and infrastructure. The works will injuriously affect the tenants living at Lea Old Hall Farmhouse, and the agricultural and shooting tenants.</p> <p>1.4 The proposed works, including cable installation and permanent easements, will restrict access and use,</p>	<p>Listed Stable Block and Barns together with the other buildings have been included within the Transmission Assets Order Limits.</p> <p>The Applicants note the comments regarding access through the yard areas at Lea Old Farm. To ensure this is appropriately managed the Outline Code of Construction Practice (APP-193), which is secured by requirement 8 of the Draft DCO, includes provisions for an Agricultural Liaison Officer (ALO) who will be appointed for commencement of pre-construction activities and will be the point of contact for ongoing engagement about practical matters. This includes conversations about the requirement and use of crossing points and the movements over the cable corridor. The role of the ALO is to be the primary point of contact for landowners in relation to day to day construction activities including crossing points and is there to create an avenue to raise any specific concerns during construction and reinstatement works and to ensure the impact on the day to day operation of the farm, including the use of access tracks, is mitigated as far as is practicable.</p> <p>The construction access route which passes through the farmyard at Old Lea Hall Farm is unlikely to be used by machinery which is any heavier than the farm machinery which operates at this location, and it is therefore considered that there is unlikely for any damage to the listed buildings as a result of vibration from construction traffic. Also, the Applicants are committed to develop Construction Noise and Vibration Management Plan(s), which will be developed from the Outline Construction Noise and Vibration Management Plan (APP-196) and which forms part of the Outline Code of Construction Practice (OCoCP). The detailed CoCP(s) are secured by Requirement 8 of Schedules 2A and 2B of the draft DCO (AS-004). Detailed Construction Noise and Vibration Management Plan(s) will be implemented by the Applicants as approved by the relevant local planning authorities in consultation with the relevant statutory stakeholders, as appropriate, and will include measures to manage vibration generating construction activities.</p>

Reference	Written Representation Comment	Applicants' response
	<p>potentially causing significant operational and financial disruption to the Landowner and its tenants.</p> <p>1.5 The proposal will reduce the shooting rights available over the land as the proposal seeks to acquire land in the middle of the ring fence affecting the feasibility of the ability to shoot over the whole holding should the scheme proceed. The shooting rights generate a modest income for the Landowner and by losing parcels of land within middle of the ring fence, this reduce the feasibility of being able to provide suitable shooting for the shooting tenant.</p>	<p>The land impacted by the cable installation works will be temporary while the 400kv cables are installed. The land will be reinstated to its agricultural use as soon as practicable following completion of the cable installation allowing current farming practices to resume.</p> <p>The Applicants are committed to seeking a voluntary agreement to secure the land and rights needed for the Transmission Assets which will provide for appropriate compensation. Under the compensation code, compensation is based on the principle of equivalence and Tallentire Limited will be compensated for the land rights sought including loss of shooting rights where applicable.</p>
REP1-208 208.3	<p>2. Concerns regarding the Development.</p> <p>a. Compulsory Acquisition of Land to be used for Ecological Mitigation. The land proposed to be acquired to be used for Ecological Mitigation is Grade II best and most versatile productive land. Reviewing the Onshore Biodiversity Benefit Statement, the proposed mitigation is the creation of neutral grassland habitat. We would request that the Planning Inspectorate consider other land in the area, which could be provided of lower quality, which does not have the productive capacity of the current land proposed.</p> <p>b. The compulsory freehold acquisition of land for a project with a design life and expected life of 30 – 60 years is considered to be unacceptable. As noted above, the land has been in the same ownership for over 600 years, and our clients are not inclined to relinquish their title for a project with an expected maximum life of 60 years.</p>	<p>The Applicant refers to their response RR-2162 2162.1 (PDA-007).</p> <p>Ecological Mitigation</p> <p>The Applicants note that the Lea Marsh biodiversity benefit area is Grade 3 based on the Provisional ALC online mapping data (Natural England 2023) and underlying soils. The Applicants have provided a technical note which describes the site selection process for the environmental mitigation and biodiversity benefit areas (Document Reference: S_D2_13). The note identifies alternative locations that were considered and provides an explanation of why the chosen areas were selected.</p> <p>Compulsory Freehold Acquisition</p> <p>Powers in the Planning Act 2008 apply the longstanding compulsory purchase regime legislation through the Compulsory Purchase Act 1965 and Acquisition of Land Act 1981 (s125 PA). As a result, it is not possible for the Applicant to seek rights for a term of years within the development consent order (DCO) under the current compulsory acquisition legislation which is why freehold acquisition is required of the land identified for long term biodiversity benefit.</p>

Reference	Written Representation Comment	Applicants' response
	<p>c. The Onshore Biodiversity Benefit Statement does not sufficiently address the long-term loss of productive land, nor undertakes an analysis of why the land has been chosen.</p> <p>d. Potential Damage to Historic Assets at Lea Old Hall Farm.</p> <p>e. Potential Security Concerns for the Historic Assets at Lea Old Hall Farm.</p> <p>f. Potential impact of cables and above-ground structures relating to the agricultural operations over the best and most versatile land.</p> <p>g. The scheme's impact, for future infrastructure development, specifically an extension of the Preston Western Distributor Road. With the completion of Edith Rigby Way, and the Penwortham Bypass, and given the persistent issues of traffic/congestion, the requirement for a new bridge over the River Ribble is vital and would provide significant public benefit. The Planning Inspectorate should ensure that the route of the cable and environmental allocation will not impact the ability to build the bridge or add additional costs for the highway authority to any proposal due to the proposed scheme.</p>	<p>The Applicants welcome the engagement from Tallentine Limited and their appointed agent regarding the land rights sought and reiterate their willingness to secure the land rights available through voluntary agreement.</p> <p>Onshore Biodiversity Benefit Statement</p> <p>The Applicants note that the in situ soil resource will not be affected by the proposed biodiversity benefit use which includes habitat creation and enhancement and therefore, there will not be a long term loss of the quality of the land. The Applicants refer to the site selection note (Document Reference: S_D2_13) to explain why the area was selected and the updated Onshore Biodiversity Benefit Statement (J11/F03) in relation to the principles of management measures</p> <p>Historic Assets at Lea Old Hall Farm</p> <p>Access is required in the vicinity of Lea Old Hall Farm to serve the 400 kV grid connection cable corridor between the A583 and River Ribble. The Applicants refer to B11 Access to Works Plan, Sheet 16 (App-157); to access this section, traffic would utilise access TAT_MGMC_57 to the north of the A583m, before travelling over the A583 on the existing overbridge.</p> <p>The Applicants note that this bridge is subject to a 32 tonne weight limit and also forms part of the Preston Guild Wheel cycle route. Consequently, appropriate management measures are proposed within an update to the Outline Construction Traffic Management Plan (OCTMP) submitted at Deadline 2 (J5/F02). These measures would manage the interface between all users of the overbridge and limit the size of vehicles.</p> <p>The measures consist of construction vehicles first being required to travel to the temporary construction compounds located on the A583 Blackpool Road and A584 Preston New Road. Material deliveries would be broken down/divided on to smaller HGVs, such that the gross vehicle load does not exceed 30 tonnes (i.e. below the overbridge weight limit) and employees would also be grouped into vehicles to reduce single occupancy trips.</p> <p>Before departing the temporary construction compounds, drivers would be required to ensure that a banksperson is in place. Once the banksperson is</p>

Reference	Written Representation Comment	Applicants' response
		<p>in place (one either side of the bridge) they will radio the driver to advise them to proceed and temporarily stop any users of the overbridge until the construction traffic has cleared the bridge.</p> <p>To support the banksperson in their duties warning signs would also be erected either side of the overbridge. Noting these restrictions, use of the construction access route which passes through the farmyard at Old Lea Hall Farm would be limited vehicles of no more than 30 tonnes.</p> <p>The Applicants refer to response REP1-208 208.2 in regard to the management of vibration from construction activities.</p> <p>Security</p> <p>The Applicants have committed to implementation of detailed Construction Fencing Plans via the following commitment, CoT20 (see Volume 1, Annex 5.3: Commitments Register (AS-030), and is secured by inclusion of Requirement 8 of the draft Development Consent Order (DCO) (AS-004) Schedules 2A & 2B. Detailed CoCP(s) will be developed in accordance with the outline CoCP. It is at this stage in the project, post consent, that detailed specification and materials for all fencing will be provided. The outline CoCP includes outline information about fencing during construction.</p> <p>CoT20 goes onto state that all temporary working areas for the onshore export cable corridor, 400 kV grid connection cable corridor, temporary compounds, and the onshore substation sites will be clearly marked and secured with appropriate fencing. This will be done in accordance with the outline Construction Fencing Plan (APP-203), as part of the outline CoCP and in accordance with Construction (Design and Management) Regulations 2015 requirements.</p> <p>The Applicants welcome discussions regarding appropriate detail to be included in the outline Construction Fencing Plan (APP-203) for the property through the Examination of the Transmission Assets.</p> <p>Above ground apparatus</p> <p>The impacts of the Transmission Assets with respect to existing farming activities (e.g., agricultural land holdings) are considered in section 6.11 Volume 3, Chapter 6: Land Use and Recreation (APP-104). The assessment</p>

Reference	Written Representation Comment	Applicants' response
		<p>has considered the permanent loss of agricultural land and disruption to existing farming operations as a result presence of link boxes. This chapter summarises that link boxes will be located within non agricultural land, where possible. However, where this is not possible, link boxes would be installed on the boundaries of agricultural land where possible to reduce the loss of land and disruption to farming operations.</p> <p>Future infrastructure</p> <p>The Applicants are not aware of any proposals or policy to promote the extension of the recently completed Western Distributor Road south across the River Ribble toward the Penwortham Bypass.</p>
REP1-208 208.4	<p>3. Proposed Resolution and Mitigation</p> <p>Discussions are ongoing with the Applicant regarding the occupation of the land by way of a lease rather than a Freehold Acquisition. We believe that the requirements set out for the Ecological Mitigation could be provided by way of a lease, and therefore the possible compulsory purchase of land for ecological mitigation should not be permitted if suitable terms can be agreed. However, we do believe that the impact of loss of best and most versatile land, should be addressed, through exploring off-site ecological mitigation or enhance existing habitats elsewhere.</p> <p>Should the scheme proceed, we would request that a new point of access is created off Blackpool Road to bypass Lea Old Hall Farm to ensure that all construction traffic is kept away from the listed buildings, reducing the likelihood of damage/ trespass.</p> <p>The location of the above ground structures should be agreed, prior to commencement of the works to ensure that the locations have minimal impact on agricultural</p>	<p>Whilst it is possible to agree a long term lease of land through voluntary agreement, powers in the Planning Act 2008 apply the longstanding compulsory purchase regime legislation through the Compulsory Purchase Act 1965 and Acquisition of Land Act 1981 (s125 PA). As a result, it is not possible for the Applicant to seek rights for a term of years within the development consent order (DCO) under the current compulsory acquisition legislation which is why freehold acquisition is sought in the DCO of the land identified for long term biodiversity benefit.</p> <p>Where the construction accesses utilise existing gateways and field entrances the Applicants will install crossing points that are required for the continued operation of farm holdings, the Applicants will facilitate discussions around the timing and use of these with the individual land interests through the ALO as set out in the Outline Code of Construction Management Plan (APP-193).</p> <p>The Applicant refers to REP1-208 208.3 in relation to security, listed buildings and above ground infrastructure.</p> <p>The Applicants refer to REP1-208 208.2 in relation to compensation.</p>

Reference	Written Representation Comment	Applicants' response
	operations, with the value of the land to be agreed and paid, prior to the commencement of the development.	
REP1-208 208.5	4. Whilst our client supports the broader objectives of renewable energy development, the current DCO proposal disproportionately impacts their land. We urge the Examining Authority to ensure that the applicant fully justifies the need for compulsory acquisition, explores less invasive alternatives, and provides fair compensation. We are open to constructive dialogue with the applicant to reach a negotiated settlement, as encouraged by the Planning Act 2008, to avoid the need for compulsory measures.	<p>The Applicants have set out their case for the powers of acquisition sought within the Statement of Reasons (REP1-012).</p> <p>The Applicants have undertaken a rigorous and robust site selection process for the Transmission Assets.</p> <p>A full reasoning and justification for the selection of the onshore cable route is provided in Section 4.9.2, Section 4.9.4 and Section 4.9.6 of Volume 1, Chapter 4, Site Selection and consideration of alternatives (AS-026). This is also supported by Volume 1, Annex 4.3: Selection and Refinement of Onshore Infrastructure (AS-028).</p> <p>The optimum route for an onshore grid connection is generally considered to be the shortest route from landfall to the Point of Interconnection (here Penwortham National Grid Substation) with due consideration of a range of constraints. The final route presented is considered to effectively achieve this, within the environmental, technical and social constraints that have been identified along the proposed onshore export cable corridor route.</p> <p>Decisions made by the Applicants in response to landowner and consultee comments and feedback, detailed technical, commercial and environmental studies, have directly informed the final route alignment. This route is considered to balance environmental and technical constraints whilst taking into account feedback from relevant land interests and other stakeholders wherever feasible.</p> <p>The Applicants welcome the engagement from Tallentine Limited and their representatives and are eager to reach a voluntary agreement for the land rights sought. The Applicants will provide updates on the status of negotiation through the land rights tracker (REP1-065).</p>
REP1-208 208.6	Please confirm receipt of this representation and provide details of the next steps in the examination process. All correspondence should be directed to Tallentine Limited /	The Applicants note the response.

Reference	Written Representation Comment	Applicants' response
	Trustees of the de Hoghton Settled Estate - Lancashire Trust C/O John Forrester Limited. We understand that personal data and representations will be made publicly available, as noted in Advice Note 8.2, and consent to this subject to the redaction of sensitive information.	

2.27 Timothy Owen Laycock

Table 2.27: REP1-212 – Timothy Owen Laycock

Reference	Written Representation Comment	Applicants' response
REP1-212 212.1	I object to the project on a number of reasons which include: 1. The heads of terms which were sent on 8 November are yet to be agreed. They are not in a format that have been accepted by my appointed Land Agent and representative. The commercial terms have yet to be agreed therefore we object.	The Applicants refer to their response to Mr Laycock's relevant representation which addresses the points made RR-2200.1 (PDA-007). Updated Heads of Term for the land rights sought were issued to Mr Laycock on 20 th May 2025. The Applicants also met with Mr Laycock's land agent on 29 th May 2025 to discuss the terms and outstanding points of difference. The Applicants are hopeful that through the ongoing negotiations, any outstanding points of difference can be resolved so the rights sought can be secured through the voluntary agreement.
REP1-212 212.2	2. The location and position of the proposed project will have huge negative affect on my land . To the far west of my farm is a commercial tree plantation for Christmas trees which we sell, we have built this business up over many years and have a very loyal customer base, the potential impact on our business if this area is touched could ruin the business, therefore open cut trenching is not appropriate. The access track leading to the Christmas trees is identified as an operational access. This access cannot be used as it is required on a daily basis to gain access to land and the Christmas trees. No other access is	The Applicants refer to their response to RR-2200.2 and 2200.3 (PDA-007) which sets out details of the impact of the holding including mitigation measures for the Christmas tree plantation.

Reference	Written Representation Comment	Applicants' response
	available therefore it would render the land inaccessible. The Operation access can be gained from Peel Road or Anna Lane.	
REP1-212 212.3	3. The cable corridors go through productive grade 2 arable land in close proximity to Lawns Farm. The land is highly productive and used to sustain our farming business of beef production and arable farming. The land in this area is low lying and close to sea level, therefore closely affected by surface water and the drainage system is vital – any interruption to the main drains in the area will cause significant flooding to the whole area.	The Applicants refer to their response to RR-2200.4 (PDA-007) in relation to the impact on land.
REP1-212 212.4	4. I object to the plans submitted as the operation accesses proposed run from Ballam Road across unaffected land, this impacts day to day farm management and creates potential health and safety issues with livestock present, it also weakens the security of the land which I regard very highly. The operational access can all be gained direct form Ballam Road without recourse of affecting more land	The Applicants refer to their response to RR-2200.5 (PDA-007) regarding the operational access
REP1-212 212.5	5. I object to the project on the location of the cable route and easement. My land would be sterilised by the cable easement, preventing any alternative use of the land	The Applicants refer to their response to RR-2200.6 (PDA-007) with regard to the sterilisation of land.
REP1-212 212.6	6. There are various documents that we object to due to the lack of information provided for this specific area – these are just standard documents that do not address the conditions of this specific location and area which include a) APP-193 (J1) Code of Construction Practice b) APP-203 J1.10 Outline Construction Plan	The Applicants refer to their response to RR-2200.7, 2200.8, 2200.9 and 2200.10 (PDA-007) which refers to the outline management plans submitted with the application.

Reference	Written Representation Comment	Applicants' response
	<p>We object to the Outline Construction Fencing, there is not the full details of all fencing, the materials and detailed specification is required at this stage. The wording relating to the fencing of the working width is inadequate to cover full security and to minimise affected parties to include fencing of crossing points.</p> <p>c) APP-202 J1.9 Surface and Groundwater Management Plan</p> <p>We object to the proposals and measures to control water run-off from the working width. No discharge of any water from the working width should be released on any adjoining land. Full detailed drainage matters need to be addressed.</p> <p>d) APP-200 J.1.7 Outline Soil Management Plan</p> <p>We object to the submission of the Outline Soil Management Plan which formed part of the outline Code of Construction Practice (CoCP). The Outline Soil Management Plan which has been submitted on behalf of the Project is not specific to the area and the route between Penwortham and Blackpool. It is not site specific and does not deal with the variants of the soil structures within the proposed route. We object to the responsibility of the implementation of the Soil Management Plan being delivered by the principal contractor and the Agricultural Liaison Officer (ALO). This must be underpinned by the Project. Section 1.7.2 Soil Stripping – it identifies that it will be recorded by the ALO prior to commencement of any construction. This does not deal with any point of discussion or input by the affected parties such as myself and essential information that has been suggested does not fully complete the evidence of the soil quality.</p>	

Reference	Written Representation Comment	Applicants' response
REP1-212 212.7	7. I have serious concerns with regard to the project, There is no certainty offered by either Morgan or Morecambe that they will develop the project, simultaneously if granted, therefore if the SOS allow this then construction of this project could last in excess of 7 years which is just not acceptable or via for my business. Timing and controls have to be issued by the SoS	The Applicants refer to agenda item D of The Applicants' Hearing Summary of the Issue Specific Hearing 1: Day 2 (REP1-035) and S_D1_5.2 Annex 5.2 to the Applicants response to Hearing Action Points: ISH1 6, 8, 9, 19, 26 & 28 - Rev F01 (REP1-039) which sets out the co-ordination between Morecambe and Morgan and why the Applicants cannot commit to simultaneous construction. The Applicants will continue to engage with Mr Morris and the appointed land agent on the potential disruption to the farm business to ensure mitigation measures can be implemented where possible. As outlined within the Outline CoCP (APP-193), an Agricultural Liaison Officer (ALO) will be appointed in time for the commencement of pre-construction activities and will be the dedicated point of contact for ongoing engagement about practical matters with landowners, occupiers and their agents during the pre-construction and construction phases.
REP1-212 212.8	8. The operational accesses as shown are unnecessary, I have had no input into this and object strongly, it creates a health and safety issue and impacts on the security of my land, they can achieve direct access off Ballam road along the cable route without affecting additional land.	The Applicants have sought to utilise existing field entrances and access points in identifying suitable operational access. Section 3.18 4 of Volume 1, Chapter 3: Project Description (AS-024), explains that the operation and maintenance of the onshore export cables would comprise a small number of visits a year and would typically be completed using a Light Goods Vehicle or other 4x4 or multi-terrain vehicle. Activities are therefore expected to be minimal, and as such, the Applicants do not envisage this will have an impact on day to day farm management or create any additional health and safety issues. Through the voluntary land agreements, the Applicants would expect to incorporate a suitable notice provision regarding the use of the operational access.
REP1-212 212.9	9. We wish to be present or our land agent present at the walk over inspection Therefore, until all these queries and have been fully answered and dealt with appropriately for our land, we object to the scheme/project.	The Applicants note the request.

2.28 Timothy Owen Laycock

Table 2.28: REP1-213 – Timothy Owen Laycock

Reference	Written Representation Comment	Applicants' response
REP1-213 213.1	This scheme absolutely wrecks the farm business and its enterprises. The arable and grassland rotation would be lost and we need that acreage to feed our 200 head of cattle who are all farm assured, with full traceability of feed stuffs given to them. The income from this enterprise would be gone for at least a minimum of 8 years and there is no way you will the land and the enterprise back into production.	As set out in the Applicants' response to the relevant representation RR-0141 141.3 (PDA-007), The Applicants are committed to working with Mr Laycock and his appointed agent to mitigate impacts on his business during construction works. This includes the commitment to a trenchless crossing zone without a haul road to reduce the impact on elements of the holding. Trenchless installation involves the underground installation of cable ducts using techniques such as horizontal directional drilling (HDD), with all construction activities confined to entry and exit pits located outside of the zone. As a result, no surface excavation, haul roads, or other intrusive works will take place within the trenchless crossing zone during construction. The extent of this trenchless crossing zone is identified as Trenchless ID 9 on the Onshore Crossing Schedule (REP1-016).
REP1-213 213.2	The land at Ballam has previously grown potatoes, carrots and cereals, it is good agricultural land. If this government needs food security you need to stop taking the land out of production. The decimation in my lifetime of grade 1 and grade 2 soils is immense due to the construction of houses and electrical infra structures. It has to stop. Why put this cable underground when all the other electric cables are generally transported above?	<p>The Applicants refer to paragraphs 2.3.2.1– 2.3.2.10 of The Applicants' Response to Relevant Representations Part 1 – Introduction and thematic responses (PDA-006) and RR-0141 141.3 (PDA-007) regarding the impact on agricultural land.</p> <p>The Applicants have undertaken an assessment of potential impacts to agricultural land and farm holdings. This is set out within sections 6.11.2 and 6.11.3 respectively of Volume 3, Chapter 6 Land use and recreation of the Environmental Statement (APP-104).</p> <p>In addition, as presented within Table 6.17 of Volume 3, Chapter 6 Land use and recreation, the Applicants have made a number of commitments (CoTs) to reduce potential effects on agricultural farmland. This includes CoT08, which states that "Post-construction, the working area will be reinstated to pre-existing condition as far as reasonably practical in line with the DEFRA Construction Code of Practice for the Sustainable Use of Soils on Construction Sites (PB13298), Institute of Quarrying (IQ) Good Practice</p>

Reference	Written Representation Comment	Applicants' response
		<p>Guide for Handling Soils in Mineral Workings (IQ, 2021) and British Society of Soil Science (BSSS) Working with Soil Guidance Note on Benefitting from Soil Management in Development and Construction (BSSS, 2022)."</p> <p>The Applicants have made a commitment (CoT12 of Volume 1, Annex 5.3: Commitments Register of the ES (AS-030)) to the complete burial of the onshore export cables to avoid the need for overhead power lines to reduce the landscape and visual effects of the Transmission Assets. This is secured by DCO Schedule 1, Part of the draft Development Consent Order (AS-004).</p>
REP1-213 213.3	The land in question on this farm cannot stand the interference of going below the top soil. The sub soil consists of a blue clay like structure and if you bring this to the surface it sets like concrete and so becomes unfarmable. It will take 20 years to get the land in a good state again.	The Applicants refer to their response provided in RR-0141 141.6 (PDA-007).
REP1-213 213.4	How are you going to stop the cables moving to the surface and in the neighbour hood we have incidents of a gas main moving to within 6 inches of the surface and no one can drive over it. On our land we have an electric communications cable which runs from Peel to Penwortham and this has often reappeared and we have ploughed through it. Moss Stocks(very old trees) that have been buried thousands of years, suddenly surface to the top of the land, many as long as 20-30 feet long. How do you expect and propose the plastic electric cables to stay deep in the ground?	<p>The burial depth of the onshore cable will be informed by site specific information, including further ground condition surveys, where required, to ensure that the cable installations are appropriately designed and buried. The indicative target depth of the onshore export cable is 1.8m to the bottom of the trench and 1.2m to the top of the protective tile (see Table 3.19 of Volume 1, Chapter 3: Project description (AS-024). It should be noted that this is deeper than industry standard guidelines set out in Energy Networks Association, Engineering Recommendation G57, issue 2 2019 which stipulates at least 0.9 metres of depth to the protective tile for transmission assets in good agricultural land, save for specific individual locations. This deeper depth minimises the risk of cables rising to the surface and is considered suitable for existing farming activities to continue in the future following the installation of the cables..</p> <p>Additionally, the onshore export cables will be monitored remotely to determine if and where corrective activities may be required. Routine inspections can be expected to take place on an annual basis, for example to</p>

Reference	Written Representation Comment	Applicants' response
		<p>check for water egress at joint bays (see Section 3.15.2 of Volume 1, Chapter 3: Project description (AS-024)).</p> <p>After construction and once the land has been reinstated for the onshore export cable corridor and the 400kV grid connection corridor, the land will return to its previous condition, and so any farming activities will be able to continue during the operation and maintenance phase of the Project.</p>
REP1-213 213.5	<p>Another aspect is the potential flooding risk and how the Main River Drains i.e. Main Drain, Wrea Brook and Branch Drain will be maintained. The cable route crosses and runs alongside these arteries of the Fylde catchment. I have seen no plans or access plans on the maps for the Riparian Owner or the Environment Agency to maintain the waterways. This access is needed at all times in order to carry out maintenance of mowing and de-weeding or if any other problems arise. We also have a Christmas Tree plantation and there was talk of drilling underneath the trees. Will the electric cable still enable the trees to grow? The trees do not like the overhead cables and make the trees poor quality and the needles are a lighter green. This I believe is due to static electricity. We will potentially lose income from the trees with harvesting and selling them on the door. We will potentially lose a massive income stream which has took 20 years to build supplying the local area with trees.</p>	<p>The Applicants refer to their response RR-0348 348.6 (PDA-007).</p> <p>Access to the existing drains and waterways will continue for those who have right to do so and it is not the Applicants' intention to interfere with or impede these rights.</p> <p>The Applicant refers to the above response REP1-213.1 regarding the commitment to install cables under the Christmas tree plantation via trenchless techniques. The restrictions on the use of the land are detailed within the table 2a and 2b of the Book of Reference (REP1-014) and it not anticipated that the installation of the underground cables will have an impact on the existing use of the land for growing of Christmas Trees. Additionally, as detailed in Volume 1, Annex 3.4: Electro-Magnetic Fields (EMF) Compliance Statement (APP-029), the 'Transmission Assets' will adopt the International Commission on Non-Ionizing Radiation Protection (ICNIRP) guidelines and Government voluntary Code of Practice on EMF public exposure (Department for Energy and Climate Change, 2012; ICNIRP, 1998, 2010). The electrical infrastructure is therefore not considered to pose safety risks to the public.</p>
REP1-213 213.6	<p>This brings me to the state of the rural roads which have not been fully maintained and are too narrow for passing wagons. There is a very uneven camber and we only travel along them at 15 miles per hour in places. There are a lot of accidents along Ballam and Peel Roads especially with lorries who come off the road and drop into the field. The road system and with 2 compound designated to our land will make it impossible to farm, also the field being</p>	<p>The Applicants refer to their response RR-0348 0348.5 (PDA-007) regarding the suitability of the existing road network for construction traffic. The Outline Code of Construction Practice (APP-193) which is secured by requirement 8 of the Draft DCO includes provisions for an ALO who will be appointed for commencement of pre-construction activities and will be the point of contact for ongoing engagement about practical matters, this includes conversations about the requirement and use of crossing points where required to access severed land during construction and thereby minimise the sterilisation of land.</p>

Reference	Written Representation Comment	Applicants' response
	split into 2 with no access to the other side of the cable route equates to me losing more land.	
REP1-213 213.7	This such a massive problem that will desecrate and disrupt the whole area and at the cost of peoples lives and well being. Its mind blowing when there is potentially other avenues to explore.	The Applicants note the response and refer to paragraphs 2.19, 2.31.2.14 – 2.31.2.18 of The Applicants' Response to Relevant Representations Part 1 – Introduction and thematic responses (PDA-006) and Hearing Action Point ISH1_9 (REP1-039).

2.29 United Utilities Water Limited

Table 2.29: REP1-217 – United Utilities Water Limited

Reference	Written Representation Comment	Applicants' response
REP1-217 217.1	<p>United Utilities Water Limited (Uuw) wishes to register an interest as an interested party in the examination. Uuw submitted a detailed response dated 23 November 2023 to the statutory consultation, which constituted a formal objection. We identified a range of issues which need further consideration as part of the determination of the Development Consent Order. The matters included (inter alia):</p> <ul style="list-style-type: none"> • Our assets and property interests; • Flood risk; • Drainage – foul and surface water; • Geo-technical / geo-environmental including any impact on the groundwater environment and water resources; and • Water supply requirements. 	<p>The Applicants note the response and the outstanding points of difference. The Applicants have requested a meeting with United Utilities Water Limited (Uuw), most recently on 28 May 2025 to discuss the Application and the points raised by Uuw.</p> <p>The Applicants have undertaken due diligence and searches in order to identify the assets and property interests owned by United Utilities and understand all the assets on the crossing schedules (REP1-016 and REP1-017) to be correctly identified. This included engagement with Uuw through Land Interest Questionnaires and ongoing discussions regarding Protective Provisions.</p> <p>An assessment of the potential for increased flood risk arising from additional surface water runoff is presented within section 2.11.3 of Volume 3, Chapter 2: Hydrology and flood risk of the ES (APP-070).</p> <p>An Outline Code of Construction Practice (APP-193) has been prepared and submitted with the application for development consent. The Outline CoCP includes measures in relation to flood risk during the construction phase (which is secured via Requirement 8 of Schedules 2A and 2B of the draft</p>

Reference	Written Representation Comment	Applicants' response
		DCO (REP1-008)). The measures include ensuring that surface water runoff is intercepted and attenuated on site, and that surface water discharges are controlled in quality and volume to ensure there is no increase to flood risk. At this stage, the exact location of water supply requirements is not known and will be developed through detailed design post consent.
REP1-217 217.2	Since our previous submission on 27 January 2025, UUV confirms that dialogue is ongoing with the applicant. This includes discussions regarding specific Protective Provisions. We will update the Examining Authority on progress with the proposed specific Protective Provisions as soon as possible.	The Applicants note the response and welcome the engagement on the protective provisions. The Applicants received a set of protective provisions from United Utilities on 27 May 2025. The Applicants are in the process of reviewing these and are confident that they will have agreed any outstanding issues before close of examination.

2.30 GR & B Mason & Son

Table 2.30: REP1-219 – GR & B Mason & Son

Reference	Written Representation Comment	Applicants' response
REP1-219 219.1	We are working a family farm and landowners of some 73 years which spans 3 generations of the same family. This proposed cable route across our farm land, some of the best farmland in the country effectively cuts our farm in two and crosses the land we farm in three different places. The proposed substation looks likely to be sited on an additional parcel of our family land farmed by our holding.	Through the ongoing engagement between the Applicants, GR & B Mason & Son and their appointed land agent, discussions regarding suitable mitigation measures are progressing with the aim of reducing disruption to the farm holding during the construction period where possible. The Applicants understand that part of the substation for Morgan Offshore Wind Limited will be sited on plots 11-123A, 11-124A, 12-019A, 12-027A under the ownership of The Executor Of The Estate Of The Late John Mason & The Executor Of The Estate Of The Late Irene Mason (REP1-004) which is currently farmed as part of GR & B Mason & Sons farm holding.
REP1-219 219.2	It's hard enough trying to make a living as a livestock farmer these days without the threat of this cable ruining our most valuable asset- our farmland- and disrupting our	The Applicants refer to paragraphs 2.3.2.1– 2.3.2.10 and 2.22.2.5- 2.22.2.7 of The Applicants' Response to Relevant Representations Part 1 – Introduction and thematic responses (PDA-006), RR-745.9 (PDA-007) and

Reference	Written Representation Comment	Applicants' response
	livelihood for many years. I understand that the two parties involved in the project will not commit to the simultaneous installation of their cables (Project representatives' statement in Landowners' meeting with at St Matthew's Church Ballam 04/12/2024). This would seem basic common sense to me. This could potentially mean that we will not see our farmland restored to any workable order in our lifetime. How are we to earn our living? How are we to produce food for our nation? Or indeed to keep our local farmworkers in their jobs?	to ISH1_28: S_D1_5.2 Annex 5.2 to the Applicants response to Hearing Action Points: ISH1 6, 8, 9, 19, 26 & 28 - Rev F01 (REP1-039) which explains why the Applicants are unable to commit to concurrent construction of the Transmission Assets.
REP1-219 219.3	We have temporarily paused our working Dairy Farm enterprise due to [redacted]. All equipment and resources have been maintained with the intention of a return to dairy farming in the near future. The uncertainty around this project has frustrated our attempts to find a Dairy Farming Tenant. We do not farm for money therefore compensation is not the answer. It's about putting our hearts and soul into the land and this cannot be distilled into monetary value, nor perhaps understood by large corporations who stand to profit from this project of so called 'green energy'	The Applicants acknowledge the uncertainty during the application and examination process. Until such time as a decision is made by the Secretary of State, expected April 2026, the Applicants have no certainty the Project can proceed and therefore encourage GR & B Mason & Son to continue with the plans and future planning for the farm. The Applicants will assist where possible to address concerns any new tenant or occupier has in relation to the land and potential future disturbance.
REP1-219 219.4	Following concerns raised by the Examining Authority's concerns around the economic impact on the proposed project on farms along the cable corridor, (specifically if businesses would be left 'viable' when land was 'returned to agriculture' and Fylde Borough Council's similar concerns), the Examining Authority requested the Applicant to 'provide plans showing how the proposed development would affect land held by individual farms so that we can have a better understanding of the effects on each farm' Issue specific hearing 1 part 8 on 2/5/2025 at 32:00).We kindly request that details of the impact on our farm and family/other land parcels we farm be provided to	The Applicants refer GR & B Mason & Son to S_D1_5.8 Annex 5.8 to the Applicants response to Hearing Action Points: ISH 46 Distribution of Land Holdings – Rev F01 (REP1-044) submitted in response to the Examining Authority's hearing action point.

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	us under the Freedom of Information Act. We feel the impact on our farming practice is unquantifiable.	
REP1-219 219.5	It seems that the cable route will leave us with a legacy of irregular shaped parcels of land with raised manhole covers to allow for cable inspection. This will make the land impracticable to farm. How are our children expected to the prime grazing land which has been mutilated by this unsolicited project? This project continues to cause us acute psychological stress when we have more pressing to consider.	<p>The works on the majority of the holding are temporary while the onshore export cables are installed, and therefore the disruption will also be temporary, and the land reinstated to its agricultural use as soon as practicable following completion of the cable installation allowing current farming practices to resume.</p> <p>The Outline CoCP secured through Requirement 8 of Schedules 2A and 2B of the draft DCO (REP1-008), sets out some examples of the role of the Agricultural Liaison Officer who will discuss accommodation works including crossing points to access land with GR & B Mason & Son where practicable to minimise the impact of the works on the landholding.</p> <p>In relation to the cable link boxes, Volume 1, Chapter 3: Project Description (APP-024) states:</p> <ul style="list-style-type: none"> • “Each [Transition Joint Bay] will contain an underground link box, contained within an underground chamber and will be accessible via an inspection cover at ground level.” (paragraph 3.14.4.4) • “Link boxes are typically located adjacent to the joint bay locations; they comprise concrete chambers with a manhole cover set at ground level to provide access during the operation and maintenance phase. Access to link boxes is anticipated on an annual basis for routine inspection, for example to check on condition and water egress.” (paragraph 3.15.2.11) • “Joint bays will be completely buried, with the land above reinstated. An inspection cover will be provided on the surface for link boxes for access during the operation and maintenance phase.” (paragraph 3.15.5.3) <p>The impacts of the Transmission Assets with respect to existing farming activities (e.g., agricultural land holdings) are considered in section 6.11 Volume 3, Chapter 6: Land Use and Recreation (APP-104). The assessment has considered the permanent loss of agricultural land and disruption to existing farming operations as a result presence of link boxes. This chapter summarises that link boxes will be located either within non-agricultural land,</p>

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		<p>where possible or on the boundaries of agricultural land to reduce the loss of land and disruption to farming operations.</p> <p>Volume 1, Annex 5.1: Human health (APP-035) considers the population health implication due to changes from the 'Transmission Assets'. The Applicants understand the DCO / NSIP process along with agreements being sought can be stressful on landowners due to the complicated nature of large scale infrastructure projects and rights being sought across their land. The Applicants are keen to engage with GR & B Mason & Son to resolve her concerns about the Transmission Assets.</p> <p>With regard to community concern about the Project and associated mental health effects, the Environmental Statement assessments deliver the statutory requirement to set out the likely significant effects of the Project. The availability of such information, including on human health in the Non-Technical Summary (APP-020), supports the community understanding of the likely project impacts and outcomes. Availability of such information is an important factor in supporting population mental health, including in relation to concerns that may arise during the application determination process. Further the Outline Communications Plan (APP-194) provides a basis for information sharing and for people to express concerns during the construction period, which is supportive of community mental health and wellbeing.</p> <p>The UK Health Security Agency and the Department of Health's Office for Health Improvement and Disparities have reviewed the assessment and state that they agree with the method.</p> <p>The Applicants acknowledge the uncertainty concerns raised by GR & B Mason & Son and the importance of the future generation of farming. Where suitable the Applicants encourage those to be involved in the heads of terms for the voluntary rights sought to ensure they are aware of the protections and restrictions in place when working around infrastructure.</p>

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REP1-219 219.6	<p>We have been met with threats of Compulsory Purchase Orders and legal action should we attempt to impede investigative work across our land. Reassurances of respect and commitment to working with landowners have proved near worthless promises. We have experienced wires from flags being left in grazing fields for cattle- a wire can kill a cow when ingested- Contractors digging exploratory trenches have already left open road gates on our farm – potentially endangering the public driving down the local country lanes when they encounter cattle straying onto the highway. replicate soil which has taken thousands of years to develop. The projects' Soil Management Plan has already proved worthless in protecting our productive grazing land from damage done during the initial investigative work. We have photographic evidence which clearly demonstrates on a small scale the impact of the soil structure on our prime grazing land. This will be provided upon request.</p>	<p>The Applicants are in ongoing engagement with GR & B Mason & Son and their appointed agent regarding the land rights sought through a voluntary agreement with the most recent meeting on the 29th May 2025.</p> <p>The Applicants acknowledge the issues during the intrusive survey campaign in 2024. Once notified, the Applicants revisited the land to ensure any further wire flags were removed from site and prohibited the further use of wire flags on site and instead used bamboo sticks or spray paint, which was agreed to be more suitable with GR & B Mason & Son and other landowners impacted by the intrusive survey campaign and is the agreed approach going forward. The Applicants understand that the issues that occurred were rectified as soon as they were brought to their attention and included within future site briefings.</p> <p>The Applicants understand the concern regarding gates being left open and understand the importance of leaving gates as they are found on site to allow the movement of cattle through fields or to prevent any risks of livestock getting out.</p> <p>The Applicants' contractors at the time of the works were not subject to the detailed controls proposed within the draft Development Consent Order and therefore the outline plans referenced do not apply to these works. Through the consent, if granted, there will be defined access routes and boundaries which enforce control further. Further works, if undertaken prior to any consent (should that be granted) will take on board lessons learned from this.</p> <p>The Applicants acknowledge that land does take time to come back to its full yield potential following intrusive surveys taking place and can confirm future crop loss has been accounted for within the compensation claim settled between the Applicants and GR & B Mason & Son' land agent.</p>

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REP1-219 219.7	We are required to meet stringent criteria to ensure our farming enterprise adheres to the Red Tractor standard/dairy contract with Arla. Red Tractor Biosecurity Policy requires farmers to establish controls to 'manage biosecurity risks on farm including risks from equipment (contractors' equipment including vehicles.... Farm visitors that have access to livestock B.Bl.1b); and that 'DEFRA approved disinfectant/cleaning equipment is available for use on boots/clothing/vehicles and facilities (B.Bl.2a). Will every vehicle coming onto our land and every individual disinfect tyres/work boots before entering our land to prevent diseases such as Foot & Mouth/TB being transferred from farm to farm? Who will ensure contractors' compliance?	<p>This Outline Biosecurity Protocol (APP-205) forms an appendix to the Outline Code of Construction Practice (CoCP) (APP-193). Following the granting of consent for the Transmission Assets, detailed Biosecurity Protocols will be prepared as a part of the detailed Code of Construction Practice(s) on behalf of Morgan OWL and/or Morecambe OWL, prior to commencement of the relevant stage of works and will follow the principles established in the Outline Biosecurity Protocol. The detailed Biosecurity Protocol will require approval by the relevant planning authority following consultation with relevant stakeholders. The Applicants and all appointed contractors will be responsible for the implementation of the detailed Biosecurity Protocols</p> <p>The Outline Management plans will be agreed and discharged by the Local Planning Authority. Once approved the plans become enforceable. The LPA has the power to inspect the site and enforce compliance, if so required. Enforcement can include stop notices, enforcement under the Planning Act 2008 or through modification request.</p>
REP1-219 219.8	During the investigative phase which has been underway for a lengthy period already, we established a Whatapp group to enable us to establish when contractors were accessing on and working on the land which we farm. This was agreed at a meeting with our land agent, representatives from the project and their land agent Dalcour McLaren. We required prior notice of dates/exact location of visitors with signing in and out. This seemed basic common sense to us and provided assurances that contractors working alongside our livestock /machinery were all accounted for under basic Health & Safety protocols. This is common practice in most workplaces and good manners considering workers were only on site permissively. It was disappointing to have several contractors not following protocol as agreed in the meeting by the project land agents Dalcour McLaren on 31st May,	The Applicants refer to the above responses to REP1-219.6 and REP1-218.7.

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	2024. Evidence of such failure to follow agreed protocol can be provided to the Examining Authority.	
REP1-219 219.9	We are grateful that Examining Authority raised our oral submission concerns around gates left open on our holding during the surveying process but disappointed by responses by at Session 8 of the Issue Specific Hearing (29.53 minutes). Outline Codes of Practice submitted as part of the DCO may not have been in operation at the time of the surveys, but policies and ALOs on site will not prevent contractors from leaving gates open. This project is only as good as the contractors on the ground. stated that ALOs will be on site and known to the farmers yet Agricultural Liaison Officers were already on site on the days when gates were left open and dangerous wires left in fields where cattle graze	The Applicants have not yet appointed contractors for the main works who are subject to the conditions in the Development Consent Order. The Agricultural Liaison officer will be bound by the management plans as approved through the Development Consent Order, which were not in place at the time of the intrusive surveys undertaken. In addition to these measures, the ALO and contractors will be subject to site supervision by the Applicants.
REP1-219 219.10	Contractors continue to fail to follow agreed protocol regarding accessing our land. (Details available). The Outline Code of Construction Practice also states Co T97 'outline Cocp include that farmers' access routes between field within a farm holding will be maintained where reasonably possible or alternative routes agreed with the landowner to ensure the continued operation of agricultural land holdings during the construction phase , where this may be possible'. We have built a series of single farm tracks which allow us to access most of our farmland over the 73 years we have farmed the land. The tracks are in use 24/7 365 by farm machinery, to move livestock between pastures, or on foot to check crops. In a meeting believed to be on 21/3/2024 we were informed by of Dalcour McLaren of their intention to 'take' these tracks for access When questioned about the word 'take' agreed that it was 'unfortunate' and reframed it as 'use ' the tracks.	As confirmed to GR & B Mason & Son, the Applicants do not propose to 'take' any of the farm tracks rather have included the ability to use farm tracks and/or existing access points, where sensible and required, to facilitate access to the cables for future operation and maintenance. The Applicants will be proactively seeking landowner engagement on site during the works and during pre-construction activities to discuss and better understand the use of the tracks at the time of the projects' works so the Applicants can ensure continued operations for the farm holding.

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	Discussion followed regarding how were we to continue to farm.	
REP1-219 219.11	Policies sound great on paper but the practicalities such as head to head traffic might be problematic. Whose business takes priority? The landowner who requires the flexibility to access their land when conditions are favourable/staff available? Are we expected to ask for permission before we let our cattle out to graze? The practicalities of this project need addressing properly rather than generating endless meaningless policies. How are our children expected to continue farming when our most valuable asset- the land has been devastated and devalued by this unwelcome and uninvited project?	<p>The Applicants have committed (CoT96 of Volume 1, Annex 5.3: Commitments Register of the ES (AS-030)) to developing detailed CoCP(s) in accordance with the outline Code of Construction Practice (APP-193). The Outline CoCP includes that farm access routes between fields within a farm holding will be maintained (where reasonably practicable), or alternative routes agreed with the land holder to enable the continued operation of agricultural land holdings during the construction phase. This is secured by Requirement 8 within Schedules 2A and 2B of the draft DCO (REP1-008). Final CoCP(s) will be implemented by the Applicants as approved by the relevant planning authority, as appropriate.</p> <p>This commitment also includes provision for an Agricultural Liaison Officer who will be appointed ahead of commencement of pre-construction activities and will be the point of contact for ongoing engagement about practical matters, this includes conversations about the requirement and use of crossing points where required to access severed land during construction.</p> <p>The Applicants are in ongoing dialogue with GR & B Mason & Son's representatives regarding the land rights sought for the Transmission Assets and are committed to securing a voluntary agreement on suitable commercial terms. If it is not possible to reach a voluntary agreement, GR & B Mason & Son will be entitled to compensation for the land rights sought.</p>
REP1-219 219.12	In our opinion, the project is ill conceived, rushed and a nonsense. We urge the Examining Authority to consider the devastating impact that this project will have upon the hardworking farmers along the cable route. We invite the Examining Authority to visit our farm during the forthcoming site inspection and request that this proposed route be scrapped and alternative routes properly investigated. Thank you.	The Applicants' note GR & B Mason & Son's comment and the request that her farm is visited as part of the Accompanied Site Inspection (ASI).

