

# **Morgan and Morecambe Offshore Wind Farms Transmission Assets DCO Application**

**Reference EN020032**

## **Submission from Newton & Clifton & Freckleton Parish Councils**

### **Summary of Case made at Issue Specific Hearing 2 Summary of Case and Action Point 33 from Issue Specific Hearing 3 Note on Compulsory Acquisition Hearing 2**

#### **Issue Specific Hearing 2, 29 and 30 July 2025**

##### ***Main agenda item 2***

The parish councils are disappointed that construction sequencing and alternative routes were not on the agenda and urge the ExA to hold hearings in the week beginning 6 October that include them as topics. We welcome the ExA's openness to further or other issues being raised at future hearings.

In any event all of the issues raised at ISH2 would be alleviated or eliminated if the alternative route from Rossall to Stanah were adopted by withdrawing this application and making a new one on that route.

##### ***Main agenda item 3***

##### **Item 1 a) Update on statements of common ground**

On the Statement of Common Ground, we welcome the action point to conclude this by D5. Although the Applicants have been going through the motions of agreeing one, the meetings that have been held have been mainly taken up by the Applicants seeking to persuade the parish councils that they shouldn't have one because we are unlikely to reach agreement on very much. On the contrary, the utility of a SoCG is precisely that it lists the issues still in dispute.

##### **Item 1 b) Updated documents and errata sheet**

The proposed changes to the application, which themselves seemed subject to further change, would not be ready until near the end of the examination and there would not be time for proper consideration of them within the examination. This is unacceptable. It is clear that the application was made prematurely before many significant issues had been tackled, never mind resolved, including bird strike risk in particular.

In particular we noted that changes involving Leach Lane have been proposed in advance of any consultation with local residents and the documents concerning the changes were incomprehensible. We are pleased that the ExA agreed with our points that the consultation should be meaningful and allow local residents to engage on an informed basis, and their recent direction that consultation take place over 32 days.

##### **Item 2 a) Landscape and Visual Effects**

It is telling that even now, well after the non-statutory and statutory consultations, the Applicants still refuse to provide renderings of the substations from meaningful viewpoints. During the consultation period this would have allowed local residents and stakeholders to understand the impact on local communities. During the examination period this would have allowed the ExA also to have that understanding. This is another example of a premature application going through an unsatisfactory consultation process.

*From Annette Sharkey, Newton with Scales resident:*

“I want to focus on the alarming absence of proper visual renderings of the proposed onshore substations—and the consequences this has for assessing impact.

Architectural renderings are essential. They help communities and decision-makers understand how proposed infrastructure will sit within real-world surroundings. Yet in this case, we’ve had virtually nothing.

In the October 2023 Prelim Environmental Info Report, the non-technical summary dedicated just one page to the substations—with no visuals. The supporting volume offered little more than abstract lines levitating over landscapes. Neither use nor ornament! This is not meaningful consultation.

The Outline Design Principles from September 2024 included just two images, which appear misleading. In Figure 10, for instance, trees are shown taller than the 30-metre lightning masts—an unrealistic portrayal that risks misinforming both public and planning officials.

At the June site visit, pegs marked the substation footprint but were placed just before and removed soon after. There were no connecting tapes to show scale, no indication of height, and no sense of how the sloping terrain might be altered—whether parts of the site would be dug in or built up. All of this matters when evaluating visual and landscape impact.

This development is on greenbelt land, visible from public rights of way and historic footpaths. These are not just open fields—they are part of a cultural and historical landscape.

Consider, for example, the traditional farm buildings along Grange Lane. These structures represent regional heritage. In a previous case (APP/M2325/E/10/212314/NWF), the Planning Inspectorate acknowledged their importance. There will be more heritage assets covered under item 11b.

Yet without accurate visualisations, we cannot assess how the substations would affect these settings. We can’t see how they might dominate rural views, or how noise and light could disrupt the area’s tranquillity.

This isn’t a minor issue. It’s a failure to assess heritage impact properly, as required by national planning policy. Setting isn’t just about distance—it’s about context, scale, and visual harmony. If the Applicants say designs aren’t finalised, then worst-case scenario renderings should be provided from key viewpoints—homes, **schools**, businesses & heritage assets,

This is about due process, transparency, and respect for the community. Without visual renderings, this application lacks the evidence needed to assess its full impact.

I respectfully urge the Examining Authority to require the Applicants to provide full, scaled renderings from critical viewpoints. This DCO should not proceed on the basis of inadequate and misleading information.

Thank you.”

*From Mike Wright Newton Residents Association:*

The site lies within a landscape identified by Lancashire County Council as gently undulating farmland with open views and minimal vertical features. This setting is not just scenic—it defines the area’s rural identity.

Large substations, noise, lighting, and above-ground infrastructure would permanently degrade this character. The proposal amounts to placing an industrial complex in green belt land and an Area of Separation. No amount of landscaping can hide or soften that impact.

The site lies between Westinghouse Springfields and BAE Warton. Adding 55 acres of new industrial development here would erase one of the last remaining green buffers between Newton, Clifton, Salwick, Freckleton, and Warton.

This loss of separation between communities is unacceptable and represents a clear step toward unchecked industrial sprawl.”

#### **Item 2 d) Green Belt considerations**

The Applicants’ response relating to the proposed alternative power transmission route is predicated on the proof of Very Special Circumstances for the proposed development on Green Belt land.. However, despite these vigorous assertions, the Applicants and NGET have both failed to produce the facts that would be available had a full assessment been carried out. Such information is totally lacking, as we have previously observed.

This issue hinges on the proof of need to infringe on the protected spaces, given that there is no argument regarding the stated need for intended delivery of green energy to the National Grid.

The question is ‘has this been achieved most effectively, in a coordinated manner and with least harm and minimum overall cost?’ This is a requirement of NPS EN1.

Despite the statements made, they have not provided the necessary evidence, nor can they until the possibility of an alternative using existing facilities, upgraded if required, and available brownfield development land designated for energy projects has been eliminated as being a more expensive option. There is much discussion around the subject, much claiming of the result, but absolutely no published hard evidence that supports the claims made, although we note there are discussions or challenges to the suggested savings.

This status would appear to conflict with the requirements of the NPS EN1 Para 5.11. Had the process permitted a selection of the connection point to the Grid to be more flexible and take account of the existing Grid infrastructure and its inherent capability, then a rework of Stanah and its adjacent Hillhouse would represent a viable, significantly more economical alternative; thus the current proposal conflicts with NPS EN1 Para 3.3.75, which sets the target of an overall saving of £6bn.

#### **Item 3 a) and b) Update and consideration on outstanding issues affecting Blackpool Airport and BAe Warton Aerodrome**

Whether or not the Applicants were advised by Blackpool Airport Operations Ltd (BAOL) or BAe Systems about the increased risk of bird strike from their environmental mitigation and biodiversity net gain proposals, the Applicants should have done this themselves according to paragraph 5.5.41 of National Policy Statement EN-1, which specifically says that ‘environmental mitigation [is] designed in such a way so as not to increase the bird strike risk to the airport for developments within 13km’.

Although agreement is close with Blackpool Airport it still seems a long way off with BAe Systems and the Ministry of Defence, and this is possibly the most important issue affecting the project. The Applicants are dissembling about whether they knew about this before the application was made.

We note that the more concessions that are made to reduce the risk of bird strike, the less likely it is that the project will fulfil its ecological obligations.

#### **Item 4 b) Mitigation areas suitability**

It is apparent that the proposed mitigation areas (not even including the proposed new BNG habitat, considered below) are not suitable as they will increase the risk of bird strike. If they are being downgraded, their benefits should be reassessed.

The existence of up to 22 masts on the substations, which are likely to need to be lit given their proximity to the two airports which, as confirmed by the Civil Aviation Authority, would be at the direction of BAOL and/or BAe Systems rather than in control of the Applicants, will also divert

migrating birds towards the airports on either side of their current route passing over the proposed substation sites, further adding to these risks.

#### **Item 4 c) BNG strategy**

The Applicants have admitted that they have excluded the temporary land within the Order Limits (i.e. the entire 30km cable route) from the biodiversity metric calculation, when it is clear that it will not be fully restored within two years (all the more so if the projects are constructed sequentially), which means it should be included according to the rules. This will increase the requirement for BNG by a very significant amount, and it is virtually certain that the claimed gains will not in fact occur at all.

The parish councils ask the ExA to require the Applicants to calculate the before and after BNG figures using the correct metric, as encouraged by the National Policy Statement (EN-1 paragraph 4.6.7) so it can at least be properly considered as to whether the project will be over or under the 10% gain target. Given the pressure on other DCOs to provide 10% BNG and the imposition of requirements for high figures in recent decision letters, this is essential even though the 10% gain is not yet a legal obligation. Any requirement added for BNG should require the correct metric to be used, not a custom-made one created by the Applicants as at present.

Not only is the BNG being offered much lower than is claimed if the metric is used correctly, but the measures to reduce bird hazards set out in the recently produced Outline Wildlife Hazard Management Plan (REP3-065) are only described as 'potential' and if implemented will serve to worsen the habitats being provided on which the existing calculations are based. The BNG scores should be recalculated for the habitats being offered with these downgrades, and an ecologist's opinion should be sought to confirm that with the downgrades they still fall under the definitions of the habitats claimed.

Note that the project is in the large National Character Area of 'Liverpool and Amoudherness Plain' which extends from Garstang to near Crosby; any habitat in this area would not suffer a spatial penalty. A map from the website of Historic England can be found [here](#):



#### Item 4 h) HRA

The Applicants have not properly described what is 'Functionally Linked Land' to the Ribble and Alt Estuaries SPA. Paragraph 4.2.3.3 of Volume 3, Chapter 4 of the ES (APP-090) attempts to define it and refers to section 4.10.5, but this does not mention functionally linked land. The parish councils request the ExA to require the Applicants to provide a plan of functionally linked land, since it effectively has the same status as the SPA itself and is likely to include some order land, and it is vital to be aware of this, given the obligations in the Habitats Regulations.

It is our view that the land on which the substations are to be built is functionally linked to the adjacent SSSI's and to the Martinmere Wildlife and Wetlands Trust directly south of the Ribble. The land and the fields which are proposed to house the substations, currently provide sanctuary between in the winter months to 20 to 30 thousand pink footed geese, whooper swans, wigeon and waders. The birds use this land as a stopover to rest and refuel because the airspace directly above the substations forms part of the East Atlantic Flyway, a superhighway for millions of migratory birds

travelling from Arctic breeding grounds all the way to southern Africa. It is so important, that world heritage UNESCO status is currently being sought by the RSPB and Wildfowl and Wetlands Trust for this highway in the sky. Any disruption along this route and habitat loss will therefore ripple out far beyond Lancashire. Footage from winter 2025, looking towards the affected land can be seen on the video submitted with this document.

As pointed out in 4b, birds avoiding the substations and masts on their way to Martinmere and the Ribble mudflats will be diverted directly into the flightpath of Warton runway located less than 2km to the south . If they north they will be flying across Blackpool Airport airspace, located 10km due west.

#### **Item 6 Hydrology and flood risk**

The updated Flood Risk Assessment submitted at Deadline 1 (REP1-025) mentions the updated Environment Agency flood zone data (e.g. paragraphs 1.5.4.1 and 1.5.4.2), but the main map showing flood zones (Figure 1.2 on e-page 78) hasn't been updated. It is essential that this is done since we understand that the zones of higher flood risk have increased in the area of the project.

#### **Item 7 d) Impacts on agriculture and farming**

It is clear that the Applicants only going to pay lip service to site link boxes at field boundaries, because they are buying the cabling in fixed lengths from China. They should calculate when they will need shorter or longer lengths to reach field boundaries and have those custom made. This whole construction technique is inappropriate for use in a landscape such as Fylde, which is irregular small fields.

Furthermore the Applicants have not discussed their Surface and Groundwater Management Plan (APP-202) with local farmers so that it can take their requirements into account, as is apparent from it not having been updated since submission.

#### **Item 9 c) Impact on local businesses such as the Wrea Green Equitation Centre**

Detailed information about the impact on local business in south Fylde is attached as Annex A to this document. This outlines the list of affected businesses, the impact including two letters of impact.

#### **Items 10 a) and b) Traffic and transportation – accesses and routes**

*From Newton with Clifton Parish Councillor and TASC Chair Phil Morgan:*

At the hearing we noted that changes involving Leach Lane have been proposed in advance of any consultation with local residents and the documents concerning the changes were incomprehensible. Our concerns are that the consultation should include information that allowed local residents to understand the proposed changes and have the opportunity to engage meaningfully with those changes, including having their concerns raised and addressed in a Consultation Report followed by a decision whether to accept these changes. Our experiences of the Applicants' approach to consultations has been poor, with predetermined outcomes, and a failure to satisfy the respective local authorities of Fylde and Lancashire to issue an Adequacy of Consultation Notice. We are pleased that the ExA agreed with these sentiments and asked the Applicants to take on board our comments.

*From Fylde BC and St Annes Town Councillor Joanne Gardner:*

"Morgan and Morecambe could not tell us exactly what the impact on residents would be in the area around Leach Lane, Blackpool Road North and the Hawthorns. How long would Leach Lane be closed for, what would this mean for the residents of Leach Lane and the roads off Leach Lane and the Hawthorns? Why do we need the (can't remember the name for them something like pits), at either end of the playing fields. It seemed like they would have to remain available for a significant period of time to accommodate the 2 projects? Basically they can't finish the project at this stage because there are 2 projects and not one."

*From Ms Christine Marshall local resident*

## Re-possible partial closure of Leach Lane

"I am writing as a concerned resident of Kilnhouse Lane in St. Annes about the possible partial closure of Leach Lane in St. Annes and how residents of Leach Lane and the surrounding area may be affected.

I had my hand up to speak at Issue Specific Hearing under Traffic management Issues but was ignored so am submitting this written submission.

I am a resident of Kilnhouse Lane which adjoins Leach Lane. I am seeking further clarification of Morgan and Morecambe's plans for this area.

I initially got involved in this project as the initial plans showed cables would be coming down this very busy residential road which is one of the main arteries for traffic either going to Lytham or more usually to the M55 Motorway. I am very glad the plans have been changed as this was clearly a ridiculous plan for such a busy road.

But I am still worried that large HGV lorries may be using Leach Lane and Kilnhouse Lane to access Queensway Road and Blackpool Road North in the current plan. These particular roads are in constant use and can easily become congested if there are any road works in the area. As a main artery if Kilnhouse Lane becomes blocked then the whole area becomes gridlocked very quickly as has happened when there have been roadworks in the area.

I have listened at the hearings and tried to scrutinize the various documents but can find no detailed plans at this time. I have emailed John Copestake at Fylde Borough Council to ask if has further clarification as to how these particular roads may be affected but there has been no further information forthcoming.

I am also concerned that residents of Leach Lane and the surrounding area may be unaware of the fact that Leach Lane may be partially closed. I have read in the documentation that: ' There is no mechanism or requirement to check whether specific residents are aware of certain issues' which shocked me but also read that 'the applicants do not consider any new or different likely significant effects will arise as a result of the proposed changes' so perhaps what is proposed here is minor and will not affect residents significantly?

However I would like clarification of this matter. My initial reaction to Morgan and Morecambe's plans was that they did not know the area at all well and were gloriously indifferent to resident's justifiable concerns. Having listened carefully at the hearings I am still concerned that they are are not fully aware of how much anxiety can be caused by unthought through plans that residents are unaware of until too late and haven't had the opportunity to consult on.

I would also like to add that I have been impressed by the detailed questioning by the Examining Authority at the Hearings and the professional way they have been conducted but have to say I have not been so impressed with the applicants who to my mind have not done their homework thoroughly enough giving rise to needless anxiety for many residents.

I remain concerned that this application may be approved simply to fulfil Government objectives and the many worries that have been raised during the hearings will be ignored. The project does seem to be a needlessly complex one with two separate companies being involved and cutting through greenbelt land unnecessarily. I hope the Examining Authorities will do due diligence and take heed of the many concerns raised.

*From Howard Duckworth, Newton with Scales resident on behalf of TASC:*

"Reference: Outline Highway Access Management Plan [REP3-024]

### 1. Local Authority Resources

Throughout this document the Applicants state that the Local Highway Authorities will need to be involved in their plan (for example)

- Example 1.3.3.5 All temporary speed limit restrictions associated with temporary accesses will be implemented by the relevant highways authority following an application by the Applicant(s) or Principal Contractor(s).
- the location and design of these signs would be agreed with the relevant highways
- Prior to the commencement of the relevant stage of works, the CTMP Co(s) would agree with the highway authorities an appropriate response time to remove any reported detritus / material on the highway following a report.
- .... and many others

The Highways authorities are going to have a significantly increased workload from this project. We, as local tax payers, pay for these authorities through our council tax for “steady state” situations, we should not have to pay to support a national infrastructure project *that is proceeding in it's current form when there is a much better option*. Perhaps the ExA could agree a section 106 agreement (or other mechanism as appropriate) whereby the Applicants pay for a significantly increased resource within the Highways Authorities to support the additional significant workload they will impose upon these authorities before, during and post construction.

Note: This situation also applies to Planning Authorities where for example detailed planning applications for these accesses will be required. Perhaps similar funding of authority resources could be provided by the applicant. There may be other authority resources requiring the same arrangement.

## 2. With regard to the actual process in the plan itself

Regarding damage to the highway and/or debris on the highway and/or other obstructions  
The community wants any problems fixed as soon as possible to minimise the risk of harm to the local community.

But the process as described in the document proposes that the Applicants will agree damages and financial impact before remediation. This is the wrong sequence - can you imagine how long the argument would take for the Applicants to justify and seek agreement on their proportion of liability for each specific item of damage. The remediation may be more time critical than the ability to forge an agreement.

Could we request the ExA to ask the Applicants to create a more proactive, timely process that gets the problem fixed and the financial agreement to follow later. The local community already have a widely understood and used “Report-It” service which is fully integrated into the management of Highway remediation by LCC Highways.

Perhaps the Applicants can fund an increase to the authorities’ Highways resources for the duration of the project and propose a way of doing this. Please note that this approach was recommended by Mr Stevens from LCC Highways.

## 3. With regard to the technical plan for the Routes

Last year the Applicants performed and documented a Fylde coast traffic study. They separated the roads network into over 100 links, a link being a stretch of road between junctions. This comprehensive plan included an assessment of the sensitivity of each link to the use by the proposed HGV movements.

We assume this information subsequently was used to inform the Applicants in their choice of routes as evidenced by the diagram in Appendix A page 40 of document Outline Construction Traffic Management Plan [REP2-016].

But the choice of routes must have also been informed by other criteria, what were these? When the choice of routes to a particular construction access point have the same sensitivity in the above study, how was the choice made?



For local people with a deep knowledge of the area the choice of routes to the substations and cable route areas are understandable, except for 2 of the routes.

We would request that the ExA ask the Applicants to explain the reasoning behind the choice of two of the routes

The yellow route through Wrea Green to Bryning Lane Links 43&45&46 chosen for access to A34/35 Bryning Lane rather than southern link 47 from A584. (Both of the links had the same sensitivity)

The green route Link 41 along Ballam Road to the cluster of access points at the junction of Ballam and Peel Roads rather than the shorter Link 30 route direct from M55 J4 at Blackpool, which uses a much shorter distance on lower classification roads. (Both of the links had the same sensitivity)

#### 4. Design of Access Points exiting/entering a highway

Document reference "Outline Highway Access Management Plan" [REP3-024]

Another situation is that the Applicants have planned on the basis that the speed limit at each access point will remain unchanged. This would seem to us to be a missed opportunity to mitigate risk, particularly when very large vehicles are frequently entering and exiting the access points. Perhaps the ExA could ask the Applicants to review the speed limits at each access point and review whether or not they should request a lowering of the limit at these points. We are particularly concerned regarding the A583 access points at A01, A50, A52, A53. Specifically, the A01 access which is off the A583 at a point where it is possibly one of the last 4 lane highways without a central reservation in the country – surely such roads are already a risk prior to any additional HGV traffic.

Thank you for your attention."

*From Mike Wright Newton Residents Association:*

"The proposed use of Thames Street as an access route (either during the construction period or ongoing operation is unsafe. Thames Street is a single-track, unlit rural lane used by pedestrians, cyclists, and horse riders. It is:

- As narrow as 2 metres in places;
- Prone to flooding;
- Has no separate footpaths;
- Already deemed unsuitable by LCC Highways for smaller developments.

There's no transport assessment, no vehicle projections, no safety mitigation—nothing to justify this use. Lower Lane, the proposed site for new crossing points, also lacks safe infrastructure and is poorly connected to the A584. LCC Highways has already expressed strong concerns in related planning responses.

If access is essential, why hasn't a direct route from the A584—on existing upgraded infrastructure—been considered?

#### Conclusion

We urge the Inspector to consider that:

- This development would cause permanent harm to a valued rural landscape;
- It puts viable farms and rural employment at risk;
- It extends industrial development into protected separation zones;
- And it relies on completely unsuitable access routes.

This isn't just about infrastructure—it's about protecting the integrity of rural communities and landscapes. We respectfully request that you recommend **refusal** of the onshore elements of the M&M proposal as currently presented."

#### Item 10 c) Outline Construction Traffic Management Plan

R16 of the dDCO requires reinstatement of temporary land within a year, whereas the Outline Construction Traffic Management Plan (REP2-016) Para 1.10.2.4 just requires reinstatement of damaged highways without a time deadline; we request that either a similar deadline is inserted in that plan, or the scope of R16 is extended to include highway reinstatement.

It is particularly likely that there will be resistance to the roads being reinstated between the projects if they are to be constructed sequentially but we would still like this done as it is inevitable that there will be delays in starting the second project beyond what is initially expected. Local people should not have to suffer years of substandard roads. It is also possible that after the second project is built the Applicants do not agree between themselves as to which project caused which damage, leading to further delays, so even if the ExA is not persuaded as to reinstatement between the projects it should be required to be done quickly after the second one.

## **Item 11 Historic Environment**

After discussion with our local historian Peter Shakeshaft regarding the investigation of Heritage Assets, there are the following further questions.

### **1. Evidence of Neolithic to Saxon & Viking Occupation and Farming Methods**

- a. In the past there was evidence uncovered in the re-design of the A585 junction at Windy Harbour of both Neolithic & Mesolithic Occupation in that area. There is a strong likelihood of similar activity all across the Fylde, with much as yet unidentified. This possibility was discussed during the ISH2 hearings.

(Reference the Oxford Archaeology North report – on excavations at A585 junction)

- b. Preston Dock – Bronze Age artefacts
- c. Digging of the Dock at Preston, close to the crossing point of the Ribble by the cable route, revealed Bronze Age artefacts within the dig. This possibility was discussed during the ISH2 hearings.
- d. Viking & Saxon

The Fylde was a known base for activity by both Saxon and Viking peoples who undoubtedly knew their way around the bogs and waterways of the south Fylde area. Very little is known, definitely, but there was a route that crossed the Fylde from the north to south, to a ford/ferry situated at Naze Point.

- e. Eeka Lane / Dow Brook

Eeka is a corruption of the local name High Carr, where Carr is the old word for a bog, This gives a clue to the type of country being dealt with. The extension of Eeka Lane is a footway which crosses the Dow Brook (an EA designated main river tributary to the Ribble RAMSAR area) via a “clap” bridge, i.e. laid flat stones – a common primitive method of bridging. The area is possibly of note for the evidence of early agricultural practices of row & furrow farming, which was common across much of the South Fylde.

### **2. Kilgrimol**

- a. The only remnant of this “lost village” is at Cross Slack, situated on the north edge of the St. Annes Old Links Golf Course close to the existing dune system. It formed a marker of the western extent of the land belonging to Lytham Priory, and there are records in the relevant papers dating back to around 980AD. Kilgrimol itself is reputed to have been lost when the coast line changed towards its modern position, probably in a severe storm event, but it would appear to have been in close proximity to the offshore cable route and its landing point. The place featured in boundary disputes recorded in “The Hawes Disputes” of the 13<sup>th</sup> century.
- b. Also, this shore is the site of much flotsam and jetsam resulting from the wreck of the Mexico, of which much was recovered but there may still be remnants present. This remains the heaviest loss of life to the Lifeboat service in the UK, when 27 crew members of 4 lifeboats were lost in the attempted rescue.

### **3. Quakers’ Wood**

- a. In addition to all the other published evidence, there are concerns that the Burial Fields across the road from the Burial Ground have not been checked, especially as we have the evidence of the 1838 Tithe plot which indicates that it was in use for burials. We understand that the majority were in these fields, rather than the Burial Ground itself where the gravestones were situated.

- b. We have received an email from the Preston Quakers, which says Quaker trustees have written to Morcom and Morgan regarding protocols, if any exhumations were contemplated. We know from your message the site was being investigated by Oxford Archaeology North. We are unaware of any direct communications to us from Morgan and Morecambe or Oxford Archaeology North, so we think they should be kept informed of anything found.

#### 4. Uncovering of Heritage Materials during MMWF Construction

##### a. Processes of Recording Finds

Although dealt with in the Project documentation suite, it remains unclear as to how the exposure of previously unrecorded sites should be handled and monitored & by whom and what overseeing authority? Who maintains the record and makes decisions as to the route forward – record and proceed, investigate or preserve the evidence.

##### b. Preservation or Not of Finds

If preserved who and where manages this process? How is the Coroner's Office informed and by whom.

### Item 12 a) Update on cumulative impact assessment

#### *Cumulative impact of consecutive rather than simultaneous construction*

Related to cumulative impacts but not dealt with at the hearing is that the cumulative effect of the two projects being constructed sequentially far outweighs them being constructed at the same time. Simply reading the agenda for ISH2 and imagining the difference between simultaneous and consecutive construction for each item will easily show the considerable difference between the two approaches. The following environmental topics in particular would be doubled in effect, in particular the duration of impacts:

- unavailability of playing fields
- interruptions to public rights of way and highways
- inability to use farmland subject to temporary possession
- impacts on onshore and offshore ecology including disturbance to birds and other species
- impact on Lytham St Annes Dunes SSSI
- impacts on hydrology and flood risk arising from construction
- construction noise and vibration
- construction traffic impacts
- construction visual impacts

If there is a gap between construction of the two projects then that would be even worse as it is likely that much land would not be restored in between and the impacts would last longer than double the time for each project to be constructed. The estimate is three years for construction but there is no obligation to stick to that time. That means the impacts lasting for a minimum of three years if the projects are constructed together to ten years if they had the maximum separation, or even longer if the second project took longer than three years to construct.

If there is an impact on an SAC, Ramsar site or SPA including functionally linked land, then the Habitats Regulations require any alternative that reduces or eliminates the impacts to be adopted. We say that the Rossall Beach to Stanah alternative would eliminate them, but failing that being adopted and the application refused, simultaneous construction would reduce the impacts by half and should be carried out. We note the ExA's attempt to seek a shorter gap between projects and the absolute refusal of the Applicants to consider this (refer to recording 3 of ISH3 (EV8-006) from 13:49:20 to 24:10:10).

In general, the whole project is being carried out almost completely at the Applicants' convenience rather than balancing the needs of local people with the needs of the project, which one might have thought would be a consequence of the examination.

#### *Cumulative impacts of solar farms*

Currently the Clifton Fields Solar Farm applicants have just submitted 47 documents in support of their 69ha application and expect this to be heard by a forthcoming Fylde Borough Council Planning Committee. The Grange Farm Solar Farm, on land to the west of Parrox Lane, is now proposing to access the 32ha site during construction down Lower Lane, Freckleton, and then onto Eeka Lane across the route of the cabling route. This access, like the previous one off Parrox Lane, has been heavily criticised by Lancashire County Council including them stating that *"As submitted LCC Highways are of the opinion that the proposed development poses an unacceptable risk to highway safety."* *"The southern end of Lower Lane connects onto the A584 via a substandard priority junction. It is LCC Highways opinion that this junction is not suitable for further intensification without acceptable mitigation measures."* *"As submitted LCC Highways are of the opinion that the proposed off-site highway works are unacceptable."* *"Currently the applicant states that there will be no impact on the M&M wind farm route. This is due to the applicants stated position that the proposals will be completed before the earliest possible start date of the M&M wind farm works. Whilst LCC Highways acknowledges the intention of the applicant, it is LCC Highways opinion that there is the possibility of both proposed developments occurring at the same time. Therefore, LCC Highways would require that the applicant reviews any potential impact and provide evidence regarding mitigation measures or reasons as to why no mitigation measures are required."*

*From Howard Duckworth, local landowner:*

APP-024 F1.3 Volume 1, Chapter 3: Project description  
Section 3.9 Programme and construction scenarios

I own land (LA924541) that has been in the search area. My first visibility in a detailed formal way with this project was in March 2022 when I signed a Non Intrusive Survey Licence with Dalcour McLaren. Since then I have taken a particular interest in this project. Whilst our land is outside the DCO red line cable and substation zone, the project will have a major impact on my life during the construction stage and beyond.

The above document refers to 3 construction scenarios, one of which is Scenario 2: Concurrent construction i.e., construction of the Morgan Offshore Wind Project: Transmission Assets and the Morecambe Offshore Windfarm: Transmission Assets at the same time.

In all the time I have been to pre-DCO public engagements and met directly on our land with Dalcour-Maclaren representatives, Scenario 2 has always been elucidated as the method of construction, there has been no talk or discussion of the alternative scenarios. The construction of the cable corridor was described as 6 underground cables, 4 for Morgan and 2 for Morecambe, all 6 being installed simultaneously with a 'typical' construction period of up to 2 years.

You can imagine my surprise when on attending the hearing, all of the discussion was about a Scenario 3 Project A and B construction method, namely Scenario 3: Sequential construction, where the Morgan Offshore Wind Project: Transmission Assets are constructed first and the Morecambe Offshore Windfarm: Transmission Assets are constructed second ... with a gap of up to 4 years

This is by far the worst construction scenario resulting in the maximum harm to landowners, farmers, equine users and the local community.

The 4 year gap effectively means that the impacted agricultural holdings will be affected for up to 7 years as there is no practical, commercial sense advantage in restarting operations during the gap.

In my view this now favoured construction scenario adds to the existing serious criticism of the pre-DCO consultation, and indeed supports the view that it was totally inadequate.

This situation proves that the harm caused by this project in its current form is unacceptable and should be rejected.

The alternative, what I understand is the "Stanah proposal/option" should now be adopted.

*From Christine Marshall local resident:*

“I would also like to say that I am aware that much research has been done on a viable alternative route which would not affect residents and the greenbelt so greatly as well as being much cheaper and I am sincerely hoping that this alternative route which makes use of existing infrastructure has been thoroughly explored by the applicants.”

#### **Item 12 b) Interrelationship with Orsted East Irish Sea Transmission infrastructure**

We heard the hostility of the Applicants towards the Mooir Vannin project, contrary to the spirit of the Holistic Network Design. In the best interests of residents affected by these multiple projects, a holistic approach and co-operation should be adopted. It is of particular note that the East Irish Sea Transmission Project, the element of Mooir Vannin in UK waters and land, is considering a landfall at Rossall Beach and then passing Stanah substation, even though the grid connection is to be at Penwortham. The other option is much further south, avoiding the Fylde area altogether. The landfall for both options shows that there have always been alternatives to the one proposed by the applicants, but that they refused to even consider these during their premature rush to seek a DCO.

National Grid Electricity Transmission, Morgan and Morecambe's promoters, and Mooir Vannin's promoter are all working in silos that will result in around £1bn of extra expenditure and two or three times the environmental impacts, all of which can be avoided relatively easily.

### **Issue Specific Hearing 3, 31 July 2025 – including Action Point 33**

The parish councils have sent typos spotted during the review of the dDCO directly to the Applicants.

#### **Articles 22 and 29**

The Book of Reference has several land parcels where both Applicants have powers of temporary possession or the creation of rights. This is unusual and may not cover the situation where they both want the same land at the same time for conflicting purposes. How will this be resolved and are these articles appropriately expressed?

#### **Requirement 1**

The Parish Councils would wish the seven year period shortened as much as possible as this will shorten any gap between the two projects and expose local residents to a shorter construction window.

#### **Requirement 4**

The parish councils request that 'external appearance' is added to the list of approved items and that Newton with Clifton, Freckleton parish and Kirkham town councils are added as consultees. Note that Fylde Borough Council agreed with this suggestion. The scheme of approval may change and it may currently not take DCO requirement approvals into account as there have not been many in this area.

#### **Requirement 5**

This requirement should be tied to existing ground levels rather than finished ground levels, which could be significantly higher. If Above Ordnance Datum is used, a local reference point expressed in AOD would be helpful for local people to understand what any AOD heights mean in practice.

#### **Requirement 8**

A check should be carried out that the commitments in the Code of Construction Practice listed in Table 1.2 actually appear in the document, perhaps by adding paragraph numbers to the table. E.g. from a sample that was checked, the text of CoT21 and CoT24 does not appear elsewhere.

#### **Requirement 12**

The parish councils believe this issue to be so important that BAOL and BAe Systems should approve the wildlife hazard management plan rather than just being consultees.

#### **Requirement 16**

As mentioned in the ISH2 summary, the scope of this requirement could be extended to cover highway reinstatement.

#### **New requirements**

##### *Drainage consultation*

Local farmers should need to be consulted on the outline surface water management plan due to the drainage issues in the area.

##### *Biodiversity Net Gain*

There should be a requirement to provide at least 10% biodiversity gain across the area, hedgerow and watercourse metrics according to the proper use of the statutory biodiversity metric.

#### *Simultaneous construction – Action Point 33*

If one project is ready to go it should wait for the other one so that they are built simultaneously (or there is confirmation that one project is not going ahead and one project can be built on its own).

Suggested drafting to achieve this is as follows:

Replace paragraph 1(1) of Schedule 2A with:

Project A must commence no later than—

- (a) the expiration of seven years beginning with the date this Order comes into force and
- (b) the expiration of six months after the commencement of Project B.

and replace paragraph 1(1) of Schedule 2B with:

Project B must commence no later than—

- (a) the expiration of seven years beginning with the date this Order comes into force and
- (b) the expiration of six months after the commencement of Project A.

A fuller justification for requiring simultaneous construction will follow at Deadline 5 but this is a summary.

Paragraph 3.3.73 of National Policy Statement EN-1 refers to the Offshore Coordination Project which 'could deliver consumer benefits of up to £6 billion by 2050' and that 'the number of new electricity infrastructure assets, including cables and onshore landing points could be reduced by up to 50 per cent over the same period, significantly reducing environmental impacts and impacts on coastal communities'. There is therefore an objective captured in EN-1 for project coordination to reduce environmental impacts and impacts on coastal communities.

Furthermore, National Grid's Holistic Network Design was based on four objectives (presumably the first, third and fourth are to be minimised and the second maximised):

1. Cost to consumer
2. Deliverability and operability
3. Impact on environment
4. Impact on local communities

As the ExA is aware, the parish councils propose an alternative route that will be significantly better in respect of all these objectives. The parish councils disagree with National Grid's characterisation in [\[REP3-088\]](#) of the alternative route as having greater cost, impacts on the environment and impacts on local communities and their rebuttal of that representation is submitted separately at Deadline 4.

If the application is not to be abandoned and resubmitted along those lines the two projects should at least be constructed simultaneously. Simultaneous construction along the proposed route would significantly improve the third and fourth objectives.

This proposal is not something newly proposed by the parish councils, sequential construction was complained about in their relevant representation [\[RR-1616\]](#) and an obligation for simultaneous construction was proposed at ISH1 (see [REP1-183](#))

As mentioned in the ISH2 summary, the location of, never mind the effects on, functionally linked land is not provided to the examination; there is a legal obligation under the Habitats Regulations to determine if there are any other feasible solutions to deliver the project which will be less damaging to the European site affected. It is clear that if there is an impact, it would be less damaging to the Ribble and Alt Estuaries SPA functionally linked land if the projects were constructed at the same time. While inconvenient to the Applicants, their commercial considerations take second place to the internationally protected sites.

Even if it is not shown that there is potential harm to the SPA and its FLL, there should at least be an incentive on the Applicants to minimise the impacts on local people through construction being undertaken as close together as possible rather than leaving timings entirely up to their discretion. As can be seen from the cumulative impacts item 12 a) in the ISH2 summary above, many environmental

impacts would be more than doubled if the projects were built consecutively rather than concurrently (there being additional impacts occurring between the construction of the projects as well as the construction impacts of each project; any small improvements to mitigation would be dwarfed by such a doubling of impact.

As has repeatedly been said choosing the alternative route for Morgan, Morecambe and also Mooir Vannin would have a much higher reduction in cost and impacts on people and the environment.



### **Compulsory Acquisition Hearing 2, 1 August 2025**

Although the parish councils were not represented at the hearing, members of the parishes did attend. Some landowners referred to the 'Distribution of Land Holdings' plan (REP1-044) and frequent mention was made of the Land Rights Tracker (RE3-040).

However, the numbers shown on the former do not relate to the numbers shown on the latter, and it would be helpful to provide a correspondence between the two to help third parties understand how they interrelate.

## **Annex A – submissions on Item 9 c) impacts on local businesses**

*From Keith McKay, Freckleton Parish Council*

“To date, much has been said about the potential impact of this application in terms of the Farming Community within Freckleton and the whole of the Fylde. Less has been said regarding the impact of the other businesses that are located adjacent to or sharing the planned access routes along the proposed build route of the transmission facilities and its associated work compounds.

This note attempts to clarify some of the feared impacts on these local businesses.

Many of these businesses are concerned that the impact of the proposed development will affect their Customer bases, thereby losing business. Whilst the Applicants will claim the impact may be temporary, the margins may be such that some will not cope with the losses, especially if the projects are separated. Loss of business can be instant, due to access issues, whilst it takes time to rebuild customer confidence. A second round may be terminal.

Some businesses may be classed as “Sensitive Receptors”, such as the two Equestrian Establishments along the route, where equines are to be subjected to noise, which may be sudden and loud, vibration and possible wind-blown rubbish from the sites. The example of the Household Cavalry in London was cited as a particularly noteworthy example. Experience has shown that a sudden rustling crisp packet in a hedge can be a terrifying spectacle to an equine quietly going about its normal business with its rider.

When dealing with Riding for the Disabled, then the Equality Legislation may also impact. Some businesses may then be subject to Planning Blight.

### **Bryning with Warton**

#### **Business on Bryning Lane /Bryning Hall Lane**

The main business affected is Wrea Green Equitation Centre. They have provided the following statement:

Their clientele range from 3 years of age, upwards, including both able bodied and disabled persons. The business operates 365 days per year and employs 10 staff who all face redundancy if the business fails.

The key concerns relate to the noise and vibration and the impact on the equine inhabitants. Equine reaction to sudden or changed noise is one of fear and flight. As such the business may be a “Sensitive Receptor”.

The property has become valueless and the prospect of relocation is minimal.

Access will be major issue for those disabled people using the facility – who arrive by adapted minibus or taxi. For the business to be effective, the rides have to run to a strict timetable, as do the clientele. It requires continual access for farm delivery vehicles, vets and farriers

It is registered as an “alternative provider” for school children who are excluded due to poor behaviour and who are booked 1 year in advance.

The likely situation represents an extreme liability for the business in terms of both humans and equines, as it is not in their gift to control the situation.

The situation also raises the question as to where this stands with respect to the impact under the Equalities Act, as the proposed development will more severely impact on the disabled users of the facility – a situation that also applies to Midgeland Road.

### **Freckleton**

## **Businesses on Hillock Lane, Freckleton, a single-track de-restricted road without lights or a footway**

These are:

### **Helical Technology**


Helical Technology made representations at the opening meetings in Blackpool, see Compulsory Acquisition Hearing Transcript Part 2, and the owner made a strong representation regarding the lack of engagement and information, particularly in respect of possible compulsory purchase of his newly acquired property.

### **Margaret Mason Florists**

Margaret Mason Florists is currently the oldest business running in the Preston area having been running continuously for some 65 years. The business provides materials for public and private events, exhibitions across the United Kingdom and even internationally. It relies on good communication and ease of access for transport of materials.

The operating base moved recently to the Barn on Hillock Lane, from the centre of Preston, due to access issues caused by development around the Preston site. Disruption of the connectivity will impact directly and severely upon the ability of the company to remain in business. It is located on land that was part of the farm belonging to the family, which is considered separately elsewhere.

The below Letter of Impact was supplied to Fylde Borough Council for their Local Impact Report. The ExA used the premises for parking when examining some of the proposed work sites on Hillock Lane.



Planning Department,  
Fylde Borough Council,  
Town Hall,  
Lytham St. Annes, FY8 1LW

### Impact of Morgan & Morecambe Wind Farm Transmission Assets

Dear Mr Copestake,

I am the proprietor of one of the foremost floristry companies and am nationally engaged in event staging and allied activities for major organisations. I am also a major supplier to local and national undertakers. I am relied upon for these services and timeliness of deliveries.

My premises are situated on Hillock Lane, Freckleton.

For many years, until recently, I operated a shop on Friargate, Preston, and was formally recognized as owning the longest-standing business in Preston. Due to changes in the Friargate area, such as University development, access and parking around the premises became increasingly difficult, leading to the closure of the shop.

In Freckleton, the site known as The Barn, on Hillock Lane, owned and developed by me some time ago for use as storage, showroom facilities and retail trade locally, now took over the Preston function also.

The plan currently being negotiated for underground cables relating to Morgan and Morecambe wind farm electricity transmission causes me considerable distress, as I believe it could lead to the closure of my business.

The plan as it stands includes the siting of a compound for plant and vehicles to the rear of the 'Barn' premises and on my land (involving compulsory acquisition, whether temporary or permanent is unclear to me). Worse still is that one of the routes chosen for HGV and other traffic associated with the installation directs traffic up and down Hillock Lane.

This road is single track for much of its length, and is poorly developed, having no footway (and no room for one) and no lighting and is subject only to National Speed Limit restrictions.

The access to the compound is proposed to be via an access track that runs through (and is part of) my land, an unmade track, which indicates possible further compulsory acquisition.

How will HGVs be accommodated in situations involving narrow roads and tracks, where large number of movements are inevitable? Passing will generally be impractical when vehicles are traveling in opposite directions or encountering other traffic.

Lack of clarity and detail in the published maps and charts precludes accurate analysis, but from the presentation so far, I can see that my business would suffer once again, to the point of closure. This would be very hard to endure after having already had to relocate much of the business from Preston.

My concerns regarding the upcoming decision on this proposal are very significant. I request that you communicate my thoughts to the examining authority, as well as those of my employees, clients, and neighbours.

Thank you for taking my concerns forward.

[Redacted signature]

Kind regards

[Redacted name]

6<sup>th</sup> May, 2025

## **Rowan Vets**

This busy veterinary practice provides small animal care for both the local population and South Fylde and offers overnight care facilities for some of the animals in need, for post operative or other treatments. It provides work experience for vets under training in conjunction with the University of Liverpool. Their site is adjacent to one of the proposed work compounds, with all of the possible adverse implications, such as noise, vibration and lights at nighttime.

This renders the site as a "Sensitive Receptor", where animals are cared for on-site and may be stressed following their treatment and may be required to be hospitalized on site as part of the recovery process. This adjacent to the Work Compound at the Kirkham Road end of Hillock Lane.

Access impacts from the proposed works will be significant whilst the disturbance from the work compound may be significant.

Again parking facilities were located here for the site inspections.

The below Letter of Impact confirms the concerns regarding the ability to continue their activities and access their customers due to the proposed development build.

**Rowan Veterinary Centre Limited, Hillock Lane, Warton, Preston, PR4 1TP**

*We are a small, independent veterinary practice serving the Fylde and Blackpool community and their companion pets for over 20 years. As well as routine and surgical care, we provide emergency and in-patient hospital care. Our main practice is located at the end of Hillock Lane, adjoining Kirkham Road. The practice was purpose built in 2010 on land previously used as a pig farm. We have a small branch practice on Whitegate Drive in Blackpool.*

*The farm road has historically been used to service this rural area and its community.*

*The building of the wind farm would have a severe impact to our business; clients, patients, staff and suppliers.*

*Clients come from Lytham St Annes, Kirkham, Freckleton, Warton and Preston and all the small villages in the Fylde and Blackpool area. When choosing a veterinary practice for their pet, an owner will consider how easy it is to access. From experience, due to the location of the practice, access is seriously affected when one part of Hillock Lane is closed and increases the time it takes to travel to the site. This is also the case when there is disruption in and around Warton, Freckleton and Kirkham. Travel times are increased from traffic build up, particularly during peak times. Previous disruptions have been short lived and tolerable with works being completed in a short time.*

*We are VERY concerned that our business will be severely and permanently affected. Due to the proposed length of time to undertake the ground works, not only in and around Hillock Lane but on the connecting travel routes, we feel clients, both current and potential, will be deterred from accessing our services because of the extra time and difficulty in getting to us, despite being within their community and geographically closer to them. We are also concerned about the impact on our patients, who are often very unwell and require intensive medical care, that the noise and added disruption will have a detrimental effect on their recovery.*

*As a small business and in a very competitive market, we could not sustain this potential loss in clients and the revenue it generates. We work hard to provide an excellent customer journey for our clients and high clinical standards for our patients. Staff would have increased travel times which will affect their work-life balance and suppliers would find it more difficult to provide us with resources. There is a very high risk of a reduction in the need for our services and as a result, the very real possibility of redundancies and ultimate closure of the business.*

*Having been advised that there is a real alternative already available, to connect the proposed wind farm to the National Grid, it is difficult to understand why a company would want to put a business and the staff it employs, at risk of failure. As a company, we take pride in providing secure employment for local people so we would urge you to seriously consider this alternative and to contribute to not only the environmental betterment of Fylde and Blackpool but to those who live within it.*

**Jacqui Leach PGCert VBM**

Practice Manager

Rowan Veterinary Centre Ltd

Hillock Lane, Warton

Preston, PR4 1TP

## **Businesses on Kirkham Road, Freckleton, a standard 2 lane Highway**

The affected businesses are:

### **Mike Threlfall Transport**

Whilst primarily a family-owned transport concern, the business also provides vehicle servicing facilities to local HGV operators in the area. Access to the premises, which Mr. M Threlfall, the owner, insists comes from the junction of the A584 at the Kirkham Prison junction, requires the use of Freckleton St and Kirkham Rd to the north of the premises. Use of the road to the south through Freckleton itself is not permitted or encouraged by the owner of the business, due to the parking and access restrictions this causes and nearby Strike Lane School.

Any access restriction to the north of his premises will affect his custom base and once this is lost, experience shows it may not be possible to recover, especially if those customers find a solution elsewhere. The fear is that the business may be forced to cease.

The submission made at REP1-223, confirms the owner's views.

### **Baxendales Funeral Directors**

The funeral directors are a family run business that relies on providing good service to their customers and relies on good, timely access to achieve their expected standard of operations in meeting funerals.

Any interference with traffic flows can have significant consequences in their ability to perform their function. This has a direct impact on their customer base and, hence, impacts on their ability to successfully run the business.

They too are concerned that loss of custom would close this valued business.

### **Strike Lane School**

The issues affecting Strike Lane relate to the impacts on access and to the environmental impacts from the construction work and noise for the substations. REP3-099 provides a full brief on the impact of the proposed development on school children across the whole of this area, with Strike Lane being just one of the affected schools, the others being Carr Hill and Newton Bluecoat School."