

MORGAN AND MORECAMBE OFFSHORE WIND FARMS: TRANSMISSION ASSETS

Applicants' Response to Deadline 3 submissions from People with Interest in Land



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1 Applicants' Response to IP submissions received at Deadline 3

1.1 Introduction

- 1.1.1.1 Following Deadline 3, Morgan Offshore Wind Limited ('Morgan OWL') and Morecambe Offshore Windfarm Limited ('Morecambe OWL'), (together, 'the Applicants') reviewed each of the submissions received from stakeholders who registered as Interested Parties (IPs) in the Examination.
- 1.1.1.2 Details of the Applicants' response to people with interest in land submissions received at Deadline 3 are set out in the subsequent sections of this document.

2 Applicants' Response to IPs' response to Written Questions (ExQ1)

2.1 Christine Fare

Table 2.1: REP3-116 – Christine Fare

Reference	IP submission	Applicants' response
REP3-116 116.1	<p>Planning Act 2008 Application by Preliminary Hearing Open Hearing 2 Point of confusion around representation of Fare Farms Ltd was raised by the ExA.</p> <p>Fare Farms have submitted written submissions at Hearing 1 and 2 through the Land Agent P Wilson & Company, in addition Mrs Christine Fare and Mr John Fare will host the site visit with the ExA on Thursday 26th June 2025.</p>	Noted, Thank you.

2.2 SHP Valuers Limited

Table 2.2: REP3-130 – SHP Valuers Limited

Reference	IP submission	Applicants' response
REP3-130 130.1	<p>Q5.1.14 The applicants Farming At CAH1, [EV5-002 at 53 minutes 30 seconds] the applicants submitted that discussions with the Hornbies Foundation Charity were "well advanced and we anticipate agreement in the coming weeks." This was countered by SHP Valuers on behalf of the Charity, and they were critical over the lack of engagement over the substation locations and emphasised that the Charity was not supportive of the project. The same valuers act for the tenant farmers and have reinforced their concerns within their earlier submission The extract sentence in bold above of Q5.1.14 requires amendment or removal as we do not act for 'the tenant farmers'. There may be some confusion as we act for JC & I Fare who are owners of land adjoining Lower House Farm and this may also cause confusion as the tenant farmer of Lower</p>	Noted, Thank you.

Reference	IP submission	Applicants' response
	House Farm is John Fare (P Wilson and Company act for the tenant John Fare). John Fare is the son of JC & I Fare. Our previous and ongoing submissions made on behalf of Hornbies Charity (Landlord) over substation locations support concerns for their tenant farmer's business.	

2.3 Midgeland Riding School

Table 2.3: REP3-087 – Midgeland Riding School

Reference	IP submission	Applicants' response
REP3-087 087.1	Subject: Re: Morgan and Morecambe OWFTA Project - Examining Authority's Written Questions I respond on behalf of Midgeland Riding School. The response received from the projects gives little comfort. There are certain construction actions where noise attenuation is limited if not impossible e.g. Lorries delivering and tipping stone for the construction of the haul road. We believe that the noise will still be at a level to startle the horses. Noise is not the only issue as the movement of larger construction vehicles and machines such as diggers will also be equally likely to startle or cause distress to the horses. In order to overcome these potential issues we believe that consideration should be given to a trenchless method of construction across our client's property. This would help to overcome these potential problems and the drainage issues which the projects consultant has identified but for which no solution is yet forthcoming	<p>The Applicants acknowledge and appreciate the concerns raised regarding the potential impact of construction-related noise on horses at Midgeland Riding School. We understand the importance of maintaining a calm and safe environment for both the animals and the people who rely on the facility.</p> <p>The Applicants will appoint an Agricultural Liaison Officer (ALO) and are committed to working closely and sensitively with Midgeland Riding School to identify and implement practical measures that will help minimise disruption throughout the construction phase. Drawing on experience from similar projects, the Applicants and their consultants will engage in ongoing dialogue with the Riding School to explore appropriate accommodation works and mitigation strategies, as outlined in the Agricultural Holding Impact document.</p> <p>The Applicants are keen to ensure that the Riding School can continue to operate effectively and safely during construction and remain fully open to all reasonable and proportionate solutions that support the wellbeing of the horses and the sustainability of the business. The Applicants are aware of guidance published by the British Horse Society 'Advice on Construction sites and horses'. This guidance states that 'quiet rustlings and sudden bangs are often more of a trigger than a continuous mechanical noise such as a digger working'. However, the guidance also acknowledges that horses may react to different triggers, and this can change on a daily basis.</p>

Reference	IP submission	Applicants' response
		<p>The Applicants note that the stables and riding school where the horses are kept are located approximately 650 metres from the onshore export cable corridor, which traverses Division Lane, residential properties, and agricultural land. At this distance, which is outside of the 300 metre study area for construction noise impacts as defined in paragraph 8.4.1.2 of APP-117, the Applicants consider that construction noise will be low compared to existing sources of noise from farming machinery, vehicular traffic, and other rural activities, and these will continue to dominate the existing environment.</p> <p>The Applicants have identified in the crossing schedule (REP1-016 and REP1-018) that part of the holding owned by Midgeland Riding School is to be installed through a trenchless crossing as requested by the landowner and appointed agent, references MGMC_ECC_WA_347, MGMC_ECC_WA_348, MGMC_ECC_WA_349 and MGMC_ECC_WA_50. There will be a requirement for a haul road in this location however the Applicants understand that installing the cables via a trenchless method in this location will reduce the impact on the business.</p> <p>The Applicants are also aware that the land next to the crossing is used to graze horses. The Applicants confirm they will seek to minimise noise as far as practicably possible in this location, through the implementation of mitigation, as set out in Construction Noise and Vibration Management Plan(s) (CNVMPs). This will be developed from APP-196 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 (REP3-009). The timings of works and movement on site will be communicated through the ALO to ensure these can be managed in conjunction with the riding school.</p> <p>Mitigation measures detailed within the CNVMPs will include those referred to within The British Horse Society document, where relevant. Such measures will include avoiding/reducing impulsive sounds in locations with horses, controlling start up and shut down of machinery when in close proximity to horses, including a 20m setback from horses where practicable, having awareness of the surrounding area and undertaking regular observations of the working area to ensure all noise</p>

Reference	IP submission	Applicants' response
		<p>controls are implemented. Noise limits will be enforced with an aim to reduce construction noise levels as far as possible.</p> <p>In regards to drainage, the Applicants have committed to developing detailed field drainage plans in consultation with affected landowners. Where required, additional land drainage will be installed to maintain the current standard of land drainage both during and after construction (as outlined in CoT84 of Volume 1, Annex 5.3: Commitments Register of the ES (REP3-013)).</p> <p>The Outline Soil Management Plan (APP-200) sets out that the ALO will engage directly with landowners to understand existing drainage arrangements prior to construction and will carry out an on site review one year into the aftercare period to assess the effectiveness of reinstated systems.</p> <p>To date, the Applicants' have undertaken a data gathering exercise with the Ellis family to understand the existing drainage on site and potential requirements which will aid with the detailed design process, which will take place following the DCO decision. In parallel, the Applicants have been actively engaging with the NFU to ensure that the drainage provisions within the DCO are clear, practical, and responsive to landowner concerns. This has already led to the inclusion of clarification on field drainage within the Outline Construction Method Statement (S_D4_11).</p>

2.4 Wrea Green Equitation Centre

Table 2.4: REP3-134 – Wrea Green Equitation Centre

Reference	IP submission	Applicants' response
REP3-134 134.1	<p>Our concerns are after 44 years in business</p> <p>1) the close proximity of the compound to our indoor area, grazing and riding field</p> <p>2) Noise and vibration - deliveries of stone etc to site</p> <p>3)Timing of all vehicle movement congestion for existing traffic creating time delays for our visiting Colleges and riders.</p>	<p>1) The Applicants note the concerns around the proximity of the compound to the equitation centre and will continue to engage on the concerns raised to ensure mitigation and accommodation works are discussions in conjunction with the landowner and Wrea Green Equitation Centre. While the Applicants do not have the detailed design available at this stage of the project, the design and layout of the compounds will be done to account for concerns and reducing impacts of neighbouring businesses, these discussions will take place between the</p>

Reference	IP submission	Applicants' response
	<p>4) Fear for riders safety -we teach from 3years of age and upwards. We have a large disability section; 5250 sessions a year, and abled bodied 9,500 a year.</p> <p>5) We operate 7days a week with our team of 10 highly skilled Coaches, their jobs would go.</p> <p>6) We are contracted - 1 year in advance as an alternative provider for local schools, special schools and Colleges throughout the Northwest and LCC Blackpool, Wyre and Preston Councils.</p> <p>7) Property would be worthless whilst work goes on. Parts of Property were built in 1780, so great concern for the affect on the stability and safety of the buildings.</p> <p>8) Horses are a fight or flight animal, in fear of the unknown sounds, they have been known to run through fences and blindly gallop through traffic at unstoppable speeds. Through no fault of our own we now find ourselves in a no win situation, that could very easily bankrupt us, together with the value of the premises worth nothing, due to the eyesore been built next to us. Which will last so we are led to believe for the next 10+ years.</p>	<p>Applicants, landowner and riding school to ensure suitable measures will be in place to allow the continued operation of the riding school.</p> <p>2) Mitigation measures identified to manage the potential effects of construction noise will be managed through Construction Noise and Vibration Management Plan(s), which will be developed from the Outline Construction Noise and Vibration Management Plan (APP-196). The mitigation measures detailed within the CNVMPs will include those referred to within The British Horse Society 'Advice on Construction sites and horses' document, where relevant, and will include avoiding/reducing impulsive sounds in locations with horses, controlling start up and shut down of machinery when in close proximity to horses, including a 20m setback from horses where practicable, having awareness of the surrounding area and undertaking regular observations of the working area to ensure all noise controls are implemented. Noise limits will be enforced with an aim to reduce construction noise levels as far as possible.</p> <p>3) Volume 3, Chapter 7: Traffic and Transport of the Environmental Statement (APP-108) contains an assessment of the potential impacts from the Transmission Assets on traffic and transport receptors, including the potential impacts of increased vehicle movements (i.e. Heavy Goods Vehicles (HGVs) and staff movements) and potential impacts resulting in congestion. To inform the assessment, the Applicants have undertaken a comprehensive data collection exercise including capturing of baseline traffic flows, speeds, identification of sensitive receptors and collisions for all highway links. The assessment concludes (with the application of mitigation measures) that the residual effects would not be significant in Environmental Impact Assessment (EIA) terms. However the Applicants acknowledge the concerns and confirm that vehicle movements and practical matters on site will be communicated through the Agricultural Liaison Officer (ALO) and the measures set out in the Outline Communications Plan (REP3-020).</p> <p>4) The Applicants acknowledge the concerns regarding safety of the riders. The Applicants will continue to engage with Wrea Green Equitation Centre regarding the works, and the ALO will be the on-site contact during the works - this commitment is secured within the Outline Code of Construction Practice (REP3-018). The ALO's responsibilities will include meeting with landowners and occupiers to ensure that potential disruption due to construction activity is</p>

Reference	IP submission	Applicants' response
		<p>minimised where possible through pre-construction planning meetings, during construction and undertaking inspections to monitor working practices.</p> <p>5) While the Applicants acknowledge there will be disruption to the land occupied by the riding school during construction, the Applicants do not anticipate this would create a loss of jobs as a direct result of the works taking place. The Applicants will work with the riding school to discuss mitigation measures to reduce the impact on the business to ensure that jobs can be maintained and the riding school can continue, In the event losses are experienced as a direct result of the project, the Applicants will compensate in accordance with the Compensation Code.</p> <p>6) The Applicants will continue to engage with the riding school regarding the works and will provide information regarding the works once available to ensure losses and impacts can be mitigated where possible. This is secured through the Outline Communication Plan (REP3-020) and through the implementation of the ALO who will be responsible for on-site matters prior to and during the works secured through the Outline Code of Construction Practice (REP3-018).</p> <p>7) The Applicants do not envisage any impact on property prices. The Transmission Assets will be fully compliant with the Compensation Code where diminution in property prices can be demonstrated to have been caused by the Transmission Assets. The code sets out the parameters and evidence needed to substantiate a claim for diminution in value and when this occurs. The UK Government has also produced a series of plain English general guides to compulsory purchase and compensation which may be useful: Compulsory purchase and compensation (The Land Compensation Manual - GOV.UK guidebooks 1 and 4 being the most appropriate).</p> <p>The Applicants note the comment regarding planning policy. Some harm to listed buildings as a result of change within their setting is identified in ES Volume 3, Historic environment (APP-096). In each case the harm occurs during construction and is therefore short or medium term and fully reversible. The harm is less than substantial and would not result in permanent change within the setting of the listed buildings or any permanent change to their heritage significance as the land will be returned to its existing use following completion of the works. This less than substantial harm should be weighed against the public benefits of the</p>

Reference	IP submission	Applicants' response
		<p>Transmission Assets. The Applicants refer to paragraph 2.3.8 of the National Policy Statement for renewable energy infrastructure (NPS EN-3) which states 'In considering the impact of the historic environment as set out in Section 5.9 of EN-1 and whether the Secretary of State is satisfied that the public benefits would outweigh any harm or loss to the significance of a designated heritage asset, the Secretary of State should take into account the positive role that largescale renewable projects play in the mitigation of climate change, the delivery of energy security and the urgency of meeting the net zero target'. CoT27 of the commitment register (REP3-013) sets out that the temporary compounds will be removed and sites will be reinstated when construction has been completed, this allowing the land to be reinstated to pasture as soon as practicable following completion of the works, restoring the setting of the listed buildings.</p> <p>8) The Applicants will engage with Wrea Green Equitation Centre to coordinate the proposed works and will agree on appropriate accommodation measures to minimise any potential impacts on the horses and the business. Once the programme of works is confirmed, the Applicants will liaise with the Equitation Centre to discuss timing and practical on-site considerations, including daily movements, through the appointment of an Agricultural Liaison Officer (ALO). Should any losses arise as a direct result of the works, the Applicants will agree compensation in accordance with the Compensation Code. However, the preferred approach is to work collaboratively with Wrea Green Equitation Centre to proactively mitigate losses wherever possible.</p>

2.5 Anne Mason

Table 2.5: REP3-114 – Anne Mason

Reference	Anne Mason Response	Applicants' response
1.1.1	IP 2005205 Anne Mason Dairy Farmer and Landowner Oral submission from Open Floor Hearing 24/06/2025.	The Applicants note the submission of the scripts from the open floor hearing.

2.6 Shelia Margaret Hall

Table 2.6: REP3-129 – Shelia Margaret Hall

Reference	IP submission	Applicants' response
REP3-129 129.1	Open Floor Hearing 2 24 July 2025 Thank you for the opportunity to speak. I am Sheila Hall, an impacted farmer. This evening people have already talked about a lack of information available to the community and to the landowners to help us properly understand the impact the construction phase will have and the long- lasting impact of the projects. There clearly continues to be an issue with the lack of clarity around the current proposals. There are also the ongoing problems impacted persons are having in trying to answers to their questions on the proposals in order to properly understand the impacts on them. How can this information gap be addressed during this examination phase so that people can raise appropriate representations in time and raise points so that the projects, the impacted people and the community can work together to achieve better outcomes? I am really concerned that our community haven't had sufficient, clear, up to date information to appreciate what these projects will mean long term for our countryside and our environment. So, I want to raise my concern that there's an information gap and ask please can it be addressed in an appropriate way and as soon as possible for things to be brought to the examination phase. Thank you	The Applicants note the submission of the scripts from the open floor hearing.

2.7 The King's Most Excellent Majesty In Right of His Duchy of Lancaster

Table 2.7: AS-073 – The King's Most Excellent Majesty In Right of His Duchy of Lancaster

Reference	IP submission	Applicants' response
AS-073 073.1	I am writing on behalf of The King's Most Excellent Majesty In Right of His Duchy of Lancaster, in relation to the Morgan and	The Applicants confirm that they are considering the comments on the terms received from the Duchy's agent. However, negotiations have been delayed to the complex and historic nature of some of the land claimed by the Duchy, and

Reference	IP submission	Applicants' response
	<p>Morecambe Offshore Windfarm, and particularly in relation to the Notice of Hearings Issued on 1st July.</p> <p>My client is of course aware of the projects and has had intermittent dialogue with them since 2022, though no meaningful engagement in relation to commercial terms for the use of land until November 2024. We now write with regard to the Compulsory acquisition hearing 2 (CAH2) on Friday 1st August, and particularly with reference to the entry in the May 2025 Land Rights Tracker that has been submitted to the Examining Authority, to clarify the position as regards the negotiation of terms to secure land rights from our client. We believe the entry provided in Line 81 on Page 25 is misleading. For ease I have inserted the entry below:</p> <p><i>[Deadline 1 update The populated Heads of Terms for the temporary rights sought were issued on 8th November 2024. Negotiations with the affected party are ongoing and a meeting took place most recently on the 6th March 2025 to discuss the land rights sought. The Applicant shall continue to engage with the appointed agent (Dalcour Maclaren) and is hopeful that the necessary land rights can be secured through a voluntary agreement]</i></p> <p>We believe that the Examining Authority should be aware of the following:</p> <ol style="list-style-type: none"> 1. Our clients, who are of course a Crown Body, have been in touch with the projects since March 2022. 2. The Heads of Terms provided on the 8th November 2024 were the first attempt to secure the land rights required from our client. 3. Following our appointment we met the Applicants agents on 16th January 2025 and outlined our clients preferred approach to the grant of necessary rights over their interests. This approach is based on their experience with 5 other offshore windfarm developments. 	<p>other parties, in the area which remains unregistered. The Applicants are arranging a meeting with the Duchy in August. The Applicants expect to provide a response to the comments on the Heads of Term provided by the Duchy, and the view of the rights held by the Duchy, ahead of that meeting to ensure the engagement meeting can effectively move negotiations forward.</p>

Reference	IP submission	Applicants' response
	<p>4. Revised Heads of Terms were issued by us to the Applicants agents on the 24th January 2025, since when no meaningful response or attempt to negotiate has been made by the projects.</p> <p>5. We have been advised that our proposal was being considered.</p> <p>6. The meeting on 6th March referred to in the Land Rights Tracker substantially provided a project update and confirmed that the projects were considering the terms set out on behalf of our clients on the 24th January 2025.</p> <p>7. Our clients have indicated that they remain prepared to engage and to reach agreement subject to agreeing satisfactory commercial terms.</p> <p>8. Our clients continue to liaise with the projects in relation to title queries.</p> <p>9. Having carried out a review of the examination documents our client, a Crown Body, has not been able to find any reference to them, other than the reference in the Land Rights Tracker referred to above.</p> <p>We also believe that our client has not been provided with vital scheme information and would ask that going forward all correspondence is copied to us.</p>	