Morgan and Morecambe Offshore Wind Farms Transmission Assets DCO Application

Reference EN020032

21st September 2025

Responses to the Examining Authority's Written Questions & Requests for Information – ExQ2, issued 2nd September 2025 to Newton with Clifton and Freckleton Parish Councils

The table below provides the responses from Newton with Clifton and Freckleton Parish Councils (NCFPC) in respect of both the direct question placed by the ExA to the Councils and subsequently the relevant requests for further comment from interested parties.

ExA Question Reference	Question	NCFPC Response
Q2.1.1.3	**Construction Scenarios** a) NCFPC has made representations calling for simultaneous construction [including REP4-167] and states that "many environmental impacts would be more than doubled if the projects were built consecutively rather than concurrently". Noting that NCFPC intends to provide a fuller justification for requiring simultaneous construction at deadline 5 (D5), could it include within this a fuller justification of why it considers that many impacts would be more than doubled?	In our response at Deadline 4, we indicated that any interval between the construction of the two projects could exacerbate adverse impacts, as significant portions of land may remain unrestored during the interim, prolonging the total duration of disturbance beyond simply doubling each project's construction period. This is likely to have transport impacts if roads or paths remain unavailable, visual impacts if any construction apparatus is left behind, ecological impacts if habitats remain unrestored and/or continue to be affected by construction apparatus, land quality impacts if farmland remains unrestored and unavailable, and water impacts if temporary impermeable surfaces remain in place. An undetermined gap between activities ought to necessitate initial restoration efforts following the first project. However, full recovery and reinstatement of the affected land is a variable process influenced by the quality of restoration, local land characteristics, and prevailing weather conditions. The commencement of the second project may be complicated by existing underground infrastructure, potentially requiring design modifications to accommodate changes resulting from the initial construction. Additionally, these pre-existing structures may impede planned access and subsequent works for the second build.

		Accurate documentation and rigorous configuration control during the first construction phase are essential to mitigate such issues; however, without mandated requirements, there can be no assurance of uniformity or precision in record-keeping. We also wish to highlight potential conflicts with the government's Sustainable Farming Incentives, which reward practices such as reduced tillage to preserve soil health, fertility, structure, and water retention, while minimizing runoff and maintaining organic matter. These benefits are further extended to carbon management, water quality, biodiversity, and the protection of historic environment features—all of which may be jeopardized by trenching across valuable agricultural land. For instance, both cable routes for the projects traverse the same fields, necessitating the removal of hedgerows and ponds and cutting through multiple land drains. As a result, complete reinstatement after the initial project cannot occur until both projects have concluded. Given these factors, accurately predicting the timeframe for full land restoration becomes highly uncertain, and there exists a finite possibility that full recovery may never be achieved. Any time that lack of restoration is extended because of the time between the two projects is an impact that is greater than the individual impacts of the two projects. This situation prompts critical questions regarding the establishment and assessment of successful restoration standards, and the identification of parties responsible for certifying satisfactory outcomes.
Q2.1.1.5	**Outline Communication Plan** An updated Outline Communications Plan has been submitted by the applicants at deadline 4 (D4) [REP4-029 c) Do the local authorities and parish councils consider that the creation of a local liaison committee should be retained in the outline plan?	The view of NCFPC is that a Local Liaison body of some form is essential to ensure that good two-way communication is established, given that prior to this point in time, communication has been markedly deficient, as has been noted in a number of responses from Lancashire County Council and Fylde Borough Council and others as well as ourselves throughout the process. We have also referenced this in our related submission. Communication has remained a significant issue and details of our comments are contained within the SoCG between the Applicants and ourselves, which forms part of this Deadline 5 submission. Given the controversial nature of this project the Parish Councils find it very disappointing that the Applicants are seeking to reduce community liaison going forwards.

Q2.1.1.7	**Critical National Priority** Paragraph 4.2.4 of National Policy Statement (NPS) EN-1 (published November 2023) sets out the Government's conclusion that there is a critical national priority (CNP) for the provision of nationally significant low carbon infrastructure. Paragraph 4.2.7 goes on to explain that the CNP policy applies following the normal consideration of the need case, the impacts of the project, and the application of the mitigation hierarchy. Paragraph 4.2.11 says that applicants should demonstrate that all residual impacts are those that cannot be avoided, reduced or mitigated and 4.2.12 says that applicants should set out how residual impacts will be compensated for as far as possible. a) For clarity and the avoidance of doubt, for each topic area the applicants are requested to set out (including any relevant cross-referencing to relevant documents) how they have met the test in paragraph 4.2.11 of NPS EN-1 that applicants must apply the mitigation hierarchy and demonstrate that it has been applied. b) It is assumed that the mitigation hierarchy has to be demonstrated to have been applied for each relevant topic area and that, if it has not been demonstrated to have been applied for just one topic area, then this would mean that the CNP policy would not be applicable for the application as a whole. Do you agree with this interpretation?	The current Application would provide a maximum of 2GW of energy to the National Grid, **or 0.27%** of the possible capacity. Whilst accepting that Green Energy sources are critical to the Government plans to decarbonise the energy infrastructure, it might be argued that, given the total of some 750GW of power covered by the current list of applications before them, any single application, particularly when facing significant challenge to its viability and the substantial harms that result to offshore and onshore protected areas and green belt, might actually fall out of this category after due assessment. The Application clashes with some of the key premises in the NPS, in respect of use of Green Belt, interference with Protected Sites and generates an unwarranted "Risk to Life" situation with regards to Bird Strike. The best possible mitigation strategy that could be adopted for all of these aspects would be to have NESO/NGET accept the proposed "Obviously Material Alternative" which utilises already existing Grid Infrastructure as far as is possible. Incidentally, this would save some £900million in costs that will otherwise be passed on the Consumers, so fails the all three tests of Smarter, Cleaner and Cheaper. The Parish Councils do not believe that the mitigation hierarchy has been properly applied for at least some topic areas given e.g. the use of BMV and flood-sensitive land for substations, flood-sensitive land, the misapplication of BNG and an alternative route that is around one tenth of the length and nearly £1bn cheaper.
Q2.1.2.2	**East Irish Sea Transmission Project** The East Irish Sea Transmission Project Environmental Impact Assessment Scoping Report was submitted to the Planning Inspectorate in August 2025. This includes two possible grid connection routes options. Are there any matters of relevance arising from the information available in that Scoping Report for the consideration of site selection and alternatives of the Morgan and Morecambe Transmission application?	The most obvious relevance of the EISTP documentation to the current application relates to the choices of options for their landing site on the coast, for which, from their opening discussions held on 12th September, the favoured site is Rossall Beach, thence to the Hillhouse TEZ. This aligns with the "Obviously Material Alternative" that has been put forward. Further, it is clear that they have been instructed to take their power to Penwortham by NESO, although they are actively pursuing the possibility of connection at the Stanah Tee as an issue to resolve prior to moving to DCO. This is relevant because the Applicants should also have considered this landfall with its reduced impacts.

		They also agree that the issue of connecting to the Heysham-Penwortham 400kV ring is the control of the power quality, as suggested in REP1-183, REP2-059, REP3-100 and REP4-166, which is the duty of the substations and their switchgear and control systems to carry out.
Q2.4.1.3	**Bird Strike Risk** The CAA published CAP772 which addresses wildlife hazard management at aerodromes. This refers to a 13km zone and suggests that safeguarding systems could be put in place which could influence land use and any development surrounding the aerodrome such that the strike risk does not increase and, where practicable, is reduced.	The Bird Strike risk is most important as this associates with a Hazard that has the potential to result in loss of life, not only to the persons on board but to those on the ground where the resulting trajectory of the vehicle takes it, whether partially controlled or not. The level of risk is driven by the overall bird population density primarily. Any development that unacceptably increases the risk should be refused. The mandated 13km zone (reference NPS EN 1 Para 5.5.41) derives from the culmination of years of analysis of incidents and experience of developing safe operations and design guidance. **Safety of life is not negotiable**.
Q2.6.2.4	**Biodiversity and bird strike risks** NPS EN-1 4.6.12 says that when delivering biodiversity net gain off-site, developments should do this in a manner that best contributes to the achievement of relevant wider strategic outcomes, for example by increasing habitat connectivity, enhancing other ecosystem service outcomes, or considering use of green infrastructure strategies. Reference should be made to relevant national or local plans and strategies, to inform off-site biodiversity net gain delivery. If published, the relevant strategy is the Local Nature Recovery Strategy (LNRS). If an LNRS has not been published, the relevant consenting body or planning authority may specify alternative plans, policies or strategies to use. If SoS was minded to agree with BAE Systems position, can the applicant comment on the quoted paragraph 4.6.12 of NPS EN-1? b) If SoS was minded to agree with BAE Systems position and on-site delivery of BNG was therefore not possible, could the councils and the applicants reach an agreement on	We have also referenced this in our related submission. The Bird Strike issue is most important as this represents a Hazard that has the potential to result in loss of life, both in air and on the ground and by attempting to mitigate it the Applicants are reducing the biodiversity quality of their already inadequate BNG proposals without assessing this. The hazard is primarily affected by the density of the bird population. The proximity of the SSSI's, Martin Mere and Ribble make the area an important habitat and part of the East Atlantic Flyway migration route. The two substations will displace thousands of birds primarily in autumn and winter. The hazard can develop in various ways – damage to the aircraft and/or injury to the crew of the vehicle followed by the consequences of that stage in terms of whether the aircraft can be controlled or whether a crash of the aircraft results, with or without crew or passengers. From a Town and Parish perspective, it is the aircraft crash that represents the real concern, as we have heard articulated by residents close to Blackpool Airport at the various reviews. This is a third-party risk in which all residents of the Fylde have an interest. Whilst the flight paths of the civilian aircraft are somewhat predictable under normal conditions,

	alternatives that would align with the NPS EN-1? c) If SoS was minded to agree with BAE Systems position, will the applicants consider submitting a without prejudice strategy for off-site delivery of BNG to satisfy the NPS EN-1, section 4.6 with additional focus on 4.6.1?	the aircraft operating from the BAE Systems aerodrome at Warton are less so. There are times when, as part of testing or proving new types, they engage in "high-energy manoeuvres" at low altitudes. Aircraft are involved with tests; sometimes these do not go to plan. Every effort is made to recover these situations, but there are times when the crew have to make an escape and leave the aircraft to its fate. There are many reasons behind loss of control, bird strike is but one of these and is the one most difficult to regulate against and prevent. Freckleton was the site of the worst "loss of life on the ground" accident in the UK, on 23 August 1944, which killed 61 people including the crew resulting from aircraft loss of control. The Village has a long memory and respect for those lost! On 2nd April 1975, the first UK Tornado prototype suffered a bird strike whilst on test at Warton, ingesting a herring gull into an engine over Freckleton Marsh, fortunately recovering to land safely, after reaching a lowest altitude approaching 30ft. The last such event was a Tornado which lost control over Blackpool Airport after a failure. This was 28th September 1996. Despite being aimed out to sea, the aircraft crashed on the beach some 800yds from the Pleasure Beach at Blackpool. The risk is always there, as is the associated hazard. The requirement for the 13km zone is well established and justified, deriving from the culmination of years of analysis of incidents and experience of developing safe operations and design guidance. Adoption of BNG areas within this zone seems to fly in the face of the requirements. **We would consider that Safety of Life overrules any other requirements.** In response to (b) and (c), this is far too late in the examination for the Applicants to be proposing an extensive area of offsite BNG if they are even capable of doing so for it to be properly examined. Unlike Town and Country Planning applications, given the scale of BNG that will be needed, some idea of where it is coming from should be provided while an application is being examined and before it is decided, otherwise the likelihood of it being

		implemented would be severely reduced and the delivery of the project would be questionable.