

Reference Number: 20052880

Representations on Behalf of Mr T J Kirkham, Mrs J E Worlock and Mrs J A Myerscough

Objections Lodged by P D Dennis

Further to the hearings in the second week of October 2025 our clients wish to clarify certain issues.

Our clients have on the 16th October 2025 received an initial response from the Projects Agents indicating that on Ballam Road the Projects will use only the southern access off Ballam Road as shown on the attached Option Plan Drawing Number 22003214\_PLN\_OP\_12356.1\_B and further state the Project with white land the northern access and remove any powers to create or use it temporarily. We attach a copy of the said plan and would be pleased if the Examining Authority will remove that access from the application.

The Projects have also indicated that post consent they will consult with the Landowner, prior to construction, to agree the route of the access from the southern bell mouth to the cable corridor, both parties acting reasonably. We would still request that the access route is along the edge of a field rather than diagonally across and would request that the Examining Authority grant powers for the access along the field edge rather than diagonally across the middle. There has been no reasonable explanation as to why the access is required diagonally across the middle and the disruption to the farming enterprise will be exacerbated. Bearing in mind that this farm will have approximately one third of its total area occupied during the construction phase all reasonable measures to mitigate the effects of the Scheme should be taken and this includes in our opinion following the edge of the field with the access route wherever possible.

On Saltcotes Road the Project have confirmed they will engage on the use of the accesses at the time of construction and will seek to share construction accesses in this location if reasonable and feasible to do so albeit there will be no commitment to do so.

We still believe there has been no reasonable explanation given as to why multiple construction accesses are required in this location especially bearing in mind that at other locations single construction accesses are adequate. We would therefore urge the Examining Authority if minded to grant permission for the Scheme to grant it only for accesses A25 and A26 deleting accesses A27 and A28 along with the construction and operational access as it affects H & J Kirkham.

As far as operational accesses off Saltcotes Road are concerned the Project have confirmed an alternative operational access is acceptable and this is shown coloured brown and blue on Option Plan Drawing Number 22003214\_PLN\_OP\_12356.2\_C but they have indicated that they will provide an undertaking not to exercise rights over those plots within the residential title at [REDACTED] provided the Project has a binding Option Agreement in place with the Kirkham family. We would urge the Planning Inspectorate to amend the operational access to provide this alternative access and remove the operational access from the residential title at [REDACTED]. We also note that there is no undertaking with respect to the construction access as it crosses the residential title at [REDACTED] and we would once again urge the Examining Authority to decline to grant construction access over the residential title at [REDACTED] (H & J Kirkham).

With respect to the mitigation area there is no realistic offer in terms of Heads of Terms on the table with the Landowners and there has been extremely limited discussion regarding the mitigation area. The Landowners concerns regarding the mitigation area other than financial remain principally future reinstatement and getting the land back into an agricultural condition and drainage.

The Landowners remain concerned regarding the lack of clarity with respect to drainage which is a vital and essential element of any consideration of Easements in this area and whilst the Project have carried out drainage investigations some months ago there has been a distinct lack of information forthcoming subsequently and we would urge the Examining Authority to delay the grant of any rights they consider granting until the Projects have produced and agreed reasonable drainage plans with Landowners.

The plans prepared by the Projects for the Scheme have been promoted on the basis that they are the worst case scenario and in the case of Messrs Kirkham this includes an extensive and widened Easement and working area adjacent to the crossing with the Network Rail railway line. As has been pointed out to the Project the Kirkham family own a caravan site including static caravans and tourers immediately to the south of the proposed route and their only area of expansion whilst not likely to impinge on the Easement area may require landscaping or similar to be placed further north which may impinge on the Easement area. This can be mitigated if the Project can prepare and produce more detailed drawings of the route of the cables moving them as far to the north within their cable routes indicated to accommodate as much area as possible being available for landscaping. Without this it may well be a case that any area of development in future is restricted due to the landscaping having to move into what would otherwise have been the development area and there is no provision available to adequately compensate the Landowners for such future losses. We would therefore urge the Examining Authority to require more detail from the Project and to clarify and move the line of the Easement as far to the north within the red line area as possible and preferably to move the southern boundary of the red line area further north.



E&OE We reserve the right to amend or add to this submission.





Drawing Location: C:\Users\jpurcell\Documents\Dalcoeur MacLaren\Morecambe & Morgan (FE) 22003214 - Geomatics\01 DM Plans\20240716\_22003214\_PLN\_OP\_12310\_insets.aprx





Key:

- Grantor's Property
- Option Area (82.36ac)
- Morecambe Corridor (16.27ac)
- Morgan Corridor (25.56ac)
- Morgan Operational Access
- Shared Operational Access

Title(s):  
LAN33998, LAN34016  
Indicative Morgan Centreline Length (1431.93m)  
Indicative Morecambe Centreline Length (1526.77m)


Coordinate System: British National Grid  
Projection: Transverse Mercator  
Datum: OSGB 1936  
Signed:



Date:  
Grantor:  
Jacqueline Anne Myerscough & Julia  
Elizabeth Worlock & Thomas John Kirkham

Location:  
Saltcotes Road, Moss Side, Westby-with-  
Plumpton, Borough of Fylde, Lancashire, FY8  
4LT

Coords: 337843, 429162  
Scheme Name:  
Morecambe & Morgan  
Drawing Name:  
Option Plan  
Drawing No: 22003214\_PLN\_OP\_12356.4\_A

Rev	Date	Description
-	06.11.2025	First Issue
A		Second Issue

Drawn:	XP	
Approved:	ET	
Sheet No:	4 of 4	
Sheet Size:	A3	



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Site Plan

Scale: 1:2500