



P Wilson & Company
Chartered Surveyors

**Planning Act 2008 - Section 88 and 89
and the Infrastructure Planning (Examination Procedure)
Rules 2010 - Rules 469 & 13**

**Application by Morgan Offshore Wind Limited and Morecambe
Offshore Wind Ltd for an Order granting Development Consent for
the Morgan and Morecambe Offshore Wind Farm
Transmission Assets**

Planning Act 2008 Application by Preliminary Hearing

Further Submissions for Deadline 6

on behalf of

**Mrs Christine Fare
Mr John Fare
& Fare Farms Limited**

of



**Interested Party Numbers – Mrs Christine Fare (20052304)
Mr John Fare (20052302) and Fare Farms Limited (20052306)**

**By
Andrew T Coney (20051124) P Wilson & Company**

1 BACKGROUND

- 1.1 My name is Andrew T Coney and I am instructed on behalf of my clients here to act on their behalf in respect of the Morecambe and Morgan Wind Farm Developments and the current DCO Inquiry into the same. I was first instructed by my clients in late December 2023.
- 1.2 During the first half of 2024 we engaged with Dalcour Maclaren, the agents acting on behalf of the Schemes (the Morgan and Morecambe Wind Farm Schemes) to discuss the impact thereof on my client's business and property at L [REDACTED] Freckleton.
- 1.3 By July 2024 we had supplied a substantive amount of information – all the information the Schemes requested to explain my client's businesses, his tenancy agreements and his farming operation along with a detailed analysis of his business.
- 1.4 The purpose for these without prejudice conversations and negotiations from my client's perspective and as I and they understood it from the Scheme's perspective through Dalcour Maclaren, was to explore the possibility of entering into an agreement whereby it would be accepted by all that it would be in the interests of all – to see my client's business cease and the Schemes proceed unfettered by the complications trying to mitigate the Scheme's impact on my client's business because at that stage (and consistently throughout our negotiations) it is my and my client's view (for reasons I have explained already and will explain again) that this cannot continue in a viable manner with the Schemes as proposed in the Draft DCO.
- 1.5 In November 2024 Dalcour Maclaren on behalf of the Schemes advised that GSC Grays were being instructed to prepare a Business Impact Assessment of the Schemes on my client's property and business.
- 1.6 With 3 working days' notice GSC Grays came on the 18th December 2024 to inspect the farm and the substantial data pack demanded (including 5 years' worth of accounts). The considerable amount of detailed data requested included past, present and future performance data and this was delivered. It took Grays and the scheme until April 2025 to produce their Draft Report.
- 1.7 That report was only made available to my clients by the Schemes after my clients agreed to sign a Non-Disclosure Agreement at the insistence of the Schemes.
- 1.8 A redacted copy – merely redacting sensitive commercial financial information about my client's businesses is being submitted by Deadline 6 by the Schemes.
- 1.9 We were advised by the Schemes that the purpose of the Grays Report was to help inform the Schemes as to the impact of their proposals on my client's property by an Independent Experts in farm business management.
- 1.10 The conclusions of the Grays Report are self-explanatory and in our submission the key ones from that are as follows –

- a) There is an agreed assessment of an average profit for my client's business. It is a highly profitable dairy enterprise.
- b) The Dairy enterprise is incapable of continuing in its current form if the Schemes as proposed proceed.
- c) That the appropriate alternative mitigation farming system is a beef system.
- d) For the Inspectorate's ease I attach at Appendix 1 and 2 two plans, the first showing the extent of my client's land holding and whether it is owned or tenanted and at Appendix 2 a plan showing the overall impact of the Schemes on that land holding.

1.11 The primary issue here is one of access. My client's Dairy enterprise is described in the Grays Report and is a grass based grazing system making highly efficient use of grass as the primary source for production of milk. The cows flows naturally and freely in an undisturbed manner across the entire farm through an extensive network of strategically placed to cow tracks and paddock graze intensively. The impact of the permanent and temporary land take and the uncertainty around the timing and delivery of one or both or either Scheme have led myself and my clients to determine the business as currently constituted cannot operate during the construction and delivery of the Schemes and that furthermore a reduced scale version thereof would not be viable because of the issues of scale and efficiency. In our minds, the Grays Report substantially confirms that.

1.12 In the six months that have followed the publication of the initial Grays Report, negotiations have continued with the Schemes around a potential settlement agreement.

1.13 The Schemes have requested further information and advised that they wish to consider whether or not there were any engineering mitigation proposals that could mitigate the impact of the Schemes on my client's business and therefore allow it to continue in some shape or form. This meeting was held on the 13th May.

Those engineering mitigation proposals were shared with my clients on 22nd September 2025.

At a similar time, the Scheme advised that they wish to take advice from Veterinary Experts on the impact of moving cow flow.

1.14 My clients agreed to that proposal and we agreed on the appointment of Mrs E Bland to commission an Independent Report to consider how the construction of the two Sub-stations, 2 – temporary build areas, 2 easements in and 2 easements out, on Lower House Farm would have on the Dairy business and my client.

At the 22nd September meeting the Vet Mrs E Bland and GSC Gray's representatives was hosted. A discussion of the mitigation options commenced including full farm access, and a real time cow flow demonstration down a mile of track, to help all involved understand the impact to the milking herd.

- 1.15 At the end of September, the Schemes then instructed Dr Owen Atkinson, a Veterinary Expert, to commission a further Report in respect of the same issues without the knowledge of my client.
- 1.16 On Wednesday, 15th October, the Schemes shared with myself and my clients, a draft of a further report prepared by GSC Grays entitled Business Impact Mitigation Options Assessment of that Report and we believe that a redacted copy is going to be submitted to the Inspectorate by Deadline 6 by the Schemes. The draft of that Report attaches to it, as Appendices, the two Veterinary Reports referred to above. It is interesting to note that Grays were instructed to provide that further report as early as August 2025 and the details here were only shared with my clients a week ago.
- 1.17 The DCO Inquiry and the Inspectorate already have my previous Submissions and my verbal evidence given at the Compulsory Purchase Hearings.
- 1.18 Throughout the last 21 months, my clients and I have done all we have been asked of in terms of supplying information to the Schemes on the clear understanding as to what we were trying to achieve – a negotiated settlement between the Parties in advance of the confirmation of the DCO.
- 1.19 We have accommodated every visit, every conversation, every request for information. In total, my clients have committed in excess of 535 hours of their time dealing with matters pertaining to the Schemes so far as it affects their property. The vast majority of that has been co-operating with the Schemes rather than objecting to the Schemes.
- 1.20 Whilst committing all that time and emotional commitment to these negotiations, Mr Fare has continued to run his farming business and Mrs Fare has continued to run her Independent Consultancy. Mr and Mrs Fare have entered into these negotiations in good faith. As I have previously advised, they don't want the Scheme to proceed, but if the Scheme has to proceed, they rather it proceeded in such a manner as it did not affect [REDACTED]

2. THE PROPOSED MITIGATION

- 2.1 Having set the background here, the Schemes as I advised above, only very recently shared their proposed mitigation strategy. The Schemes requested a meeting to discuss the further Report from GSC Grays, Business Impact Mitigation Options having supplied the same to us on Wednesday of last week (15.10.2025), we met them on Friday (17.10.2025).

The dates please should be noted – Grays were instructed in August to prepare this report and it is only shared with us this last week and a week in advance of Deadline 6.

- 2.2 The Schemes wanted to discuss with my clients and I the Grays further Report and we declined to do so, advising the Scheme that they could submit a redacted copy (in respect of commercially sensitive financial information) to Deadline 6 with both Parties then making their own representations in respect of the same and hence these further Representations. As a consequence, and over the last week, my clients and I have considered the further Grays Report, we have not had the time

to prepare or submit detailed Counter Proposals because we have not had time to properly consider the same. I would, however, on behalf of my clients, like to make the following observations of the further Report that would allow the Inspectorate and the Examining Body to draw their own conclusions when considering this further Report and the outcomes of the first Grays Report.

2.3 The following, therefore, is a summary of the observations we have on the further Grays Report in respect of the Business Impact Assessment.

2.3.1 The scope of the report and the general approach is clearly stated in the Executive Summary, crucially Grays are instructed to assume that where the provision of new and/or amended infrastructure and/or mitigations is required to deliver the continuance of Dairy Farming, the Projects will provide such infrastructure and their own expense and to the appropriate standard. Grays are assuming that the mitigation proposals will work.

2.3.2 Careful examination needs to be given to the two Veterinary Reports, Mrs E Bland is a well respected Dairy Veterinary Expert who specialises in grass based systems. She has inspected the farm visited the location and reviewed the cow flow and assessed the potential cow behaviour.

2.3.3 The Grays' conclusions in the Executive Summary clearly rely on the assumptions that the Projects will provide the unproven mitigation proposals. It relies on Dr Atkinson's views and cheerfully ignores Mrs E Bland's and it acknowledges that the reduction in scale will require a different management approach from Mr Fare of which they feel is not unreasonable to expect a prudent person seeking to mitigate his losses in such a situation. A sea change from their first Report where they clearly state the appropriate mitigation here is a beef based enterprise.

2.3.4 At a high level under Section 2 of their Report and development scenarios we don't believe that Grays have taken sufficient account of the impact of temporary land take and/or the unknown timings of the Schemes proceeding, neither do we believe the mitigation proposals proposed adequately deal with this. Dairying enterprises have at least a three year lead in terms of breeding replacement stock in advance of committing to breeding replacement stock. We have to be able to predict what land that will be available three years' in advance of committing to breeding replacement stock.

As I have previously advised, both in writing and verbally, the uncertainty around the timing and delivery of these Schemes is one of the major factors impacting my client's business and mental well being and the ability of the business to be sustained going forward throughout the construction phase.

2.3.5 The review of the mitigation options is clearly based on the statements and assumptions made. It acknowledges that Dr Atkinson concludes that it would be challenging but feasible to continue a grazing system while Mrs E Bland's view it is not feasible to maintain a Dairy enterprise. The Grays Report and the Schemes then choose to ignore Mrs E Bland's view and proceed to argue that the impact here can be mitigated to allow a Dairying System to continue. If I am being charitable that is a very convenient line of argument to take and I do not believe that Grays would be able to sustain, as a professional Expert, the line they have

taken here, without the clear assumptions and instructions that they have been told to act under by the Schemes.

If you ask a question in a manner that can only be answered one way, that does not make the answer correct.

- 2.3.6 There is no evidence in the further Business Impact Assessment other than the assertion and view of Dr Atkinson that the proposed mitigation measures are or will be capable of being delivered or working and indeed, in his own words, Dr Atkinson concludes that even under his proposals it will be challenging to do so.
- 2.3.7 The financial viability of the proposed mitigation solution is fundamentally flawed because again, there is no evidence in the Business Impact Assessment to show that the mitigation proposals proposed will actually work, in fact the evidence is to the contrary.
- 2.3.8 The Grays conclusions are again, based on Dr Atkinson's views and completely ignore those of Mrs E Bland who was appointed by the Schemes as an Independent Expert.
- 2.3.9 So far as the financial information contained in the Appendices are concerned, we have neither had the time or frankly the inclination to consider it in any detail because we believe that the Grays Report is so fundamentally flawed because of the instructions upon which were given to Grays and the assumptions that they have made.
- 2.3.10 However, what is worthy of further commentary is in respect of the Draft Expert Report of Dr Owen Atkinson.
- 2.3.11 I have already highlighted the lateness of his instructions and the fact that this is a desktop assessment. Again, I think it is interesting to note his instructions and the assumed facts. If you ask a question in a certain way, you get the answer you want.
- 2.3.12 We would fundamentally disagree with Dr Atkinson's statements in Section 3 of his Report on the performance of this business when compared to average Dairying businesses. He is not comparing like with like. My client's business is widely recognised as one of the most efficient Dairying businesses in the North West of England and that recognition has been made by many and independently.
- 2.3.13 How Dr Atkinson can at Paragraph 44 say admit that he does not know how precisely the grazing rotation routine works and then go on to argue that it could be sustained by the mitigation proposals demonstrates a fundamental misunderstanding of my client's business and how the operation works.
- 2.3.14 Dr Atkinson's mitigation proposals are again fundamentally flawed. Neither he nor the Schemes have any idea as to the timing or nature of construction or the length of the construction periods, so how he can state that the disruption will not be long lasting is frankly beyond us. Whilst the provision of underpasses or over bridges might assist, to base recommendations on the assumptions that there could be communication between the construction of these Schemes and my client is frankly laughable. These Schemes have already demonstrated through the Environmental

and Ground Investigation Survey that they have been undertaking in the last eighteen months that communication between the Schemes, their Agents, their Contractors and those affected is frankly appalling, a point that is made widely to the Inspectorate and the Inquiry throughout the DCO Inquiry.

- 2.3.15 At Section 4, Dr Atkinson accepts that he has not considered beef rearing in any depth, in fact I don't think he has considered it at all and the assumptions that he makes as to 150 or a 200 cow dairy herd going forward are made without any actual evidence that can be the case, this is all based on opinion and as with the Grays Report it is an opinion caveated by the nature of the instruction and assumptions made and no evidence has been submitted to show that the mitigation proposals, assumptions and instructions can be delivered successfully.
- 2.3.16 Dr Atkinson's conclusions are based on assumptions rather than the facts and the performance of my client's Farming Business.
- 2.3.17 At Paragraph 1.15 Dr Atkinson accepts continuation of the Dairy Enterprise at [REDACTED] during construction is feasible but challenging and the proposed mitigation strategies are sound and yet gives no evidence, just opinion, as how he arrives at those conclusions.
- 2.3.18 To say that we disagree with Dr Atkinson's conclusions is an understatement.
- 2.3.19 Alternatively, Mrs E Bland gives a considered balanced and evidenced Report as to the impact of the proposed mitigation on my client's business and concludes that although various mitigation factors have been considered, the reduction in herd size require to continue the Business as Dairy would be so large that the Business would be unlikely to be viable financially and would be unlikely to meet compliance issues with the ARLA contract in several areas. Mrs E Bland is a recognised Expert in grazing systems and has inspected the Farm and knows the Farm.

3. CONCLUSIONS

- 3.1. It is my submission and it is my client's view here that regrettably if these Schemes are to proceed then his Dairying Enterprise will have to cease, that is not something they wish to contemplate but they are being forced to do. They have entered into in a completely bona fide manner, what they felt would be an open and honest negotiation with the Schemes to provide a solution and an outcome that would see them compensated for the closure of my client's business and allow the Schemes to proceed unfettered with the construction of the largest engineering elements of this Scheme – the two Sub-Stations and all the cable runs in and out along with the permanent accesses thereto.
- 3.2 That would be achieved by effectively severing 75% of my client's Farm, i.e. everything north of the new permanent access road to the Sub-Stations.
- 3.3 As previously advised and stated, my client's highly profitable Dairy Business is only profitable and so successful for the following reasons –
 - a) It is ruthlessly efficient on the use of grass for milk production.

- b) It is ruthlessly efficient in keeping all other costs in the Business to a minimum.
 - c) The grassland management is second to none and drives those efficiencies.
 - d) The paddock grazing system delivers all of that and the free movement of cattle throughout the Farm on the cow track system and the paddock grazing system is what delivers that.
- 3.4 With a three year lead time for breeding replacement livestock my clients have to know what land is going to be available to them reliably over three years in advance. Simply providing additional replacement cow tracks to unknown quantities of land with unknown dates as to when it will be available is not mitigating the losses here, it is merely going to compound them.
- 3.5 I regret to advise that in my view the manner in which the Schemes have conducted these negotiations and their investigations is wholly regrettable, they are putting huge pressure on my clients both from a practical, physical and mental perspective over the last twenty months, constantly promising answers and only coming up with further questions.
- 3.6 Without the economies of scale and the efficiencies in the Business, the Dairying Business at [REDACTED] is not sustainable and is not profitable, I know that, Mr and Mrs Fare know that and Mrs E Bland knows that.
- 3.7 Dr Atkinson and GSC Grays are only able to conclude otherwise because of the instructions they have been given and the assumptions upon which their views are made and I have demonstrated this and other evidence given to the Inquiry on behalf of my clients that those instructions and assumptions are fundamentally flawed because the mitigation proposals upon which they are based are completely unproven to work.
- 3.8 The Inspectorate have acknowledged that [REDACTED] is the most severely impacted property on the Scheme, they like we, have pushed the Scheme to engage in meaningful dialogue and updates with regard to the impact of their proposals on [REDACTED] and whilst the Schemes have spent a lot of time, and I am sure money, in considering this, they have not actually done anything to provide any mitigation that can work.
- 3.9 It would be my submission that the only way to reduce the impact of these Schemes on [REDACTED] is to see them redesigned so as to move the Sub-Stations and the cable runs into them off [REDACTED] or for the Schemes not to proceed at all.
- 3.10 Failure to do either of those things will necessitate the closure of my client's Dairying Business with all the implications it has for my clients.
- 3.11 I and my clients remain available, as we have been throughout this process, to the Schemes and indeed the Inspectorate to further address any questions or concerns they have in respect of the impact of these Schemes on [REDACTED] and Mr Fare's businesses and we would happily address any questions or concerns the

Inspectorate have in respect of this further Submission and any further Submission made by the Schemes so far as they affect [REDACTED].

Appendices:

Appendix 1 Plan

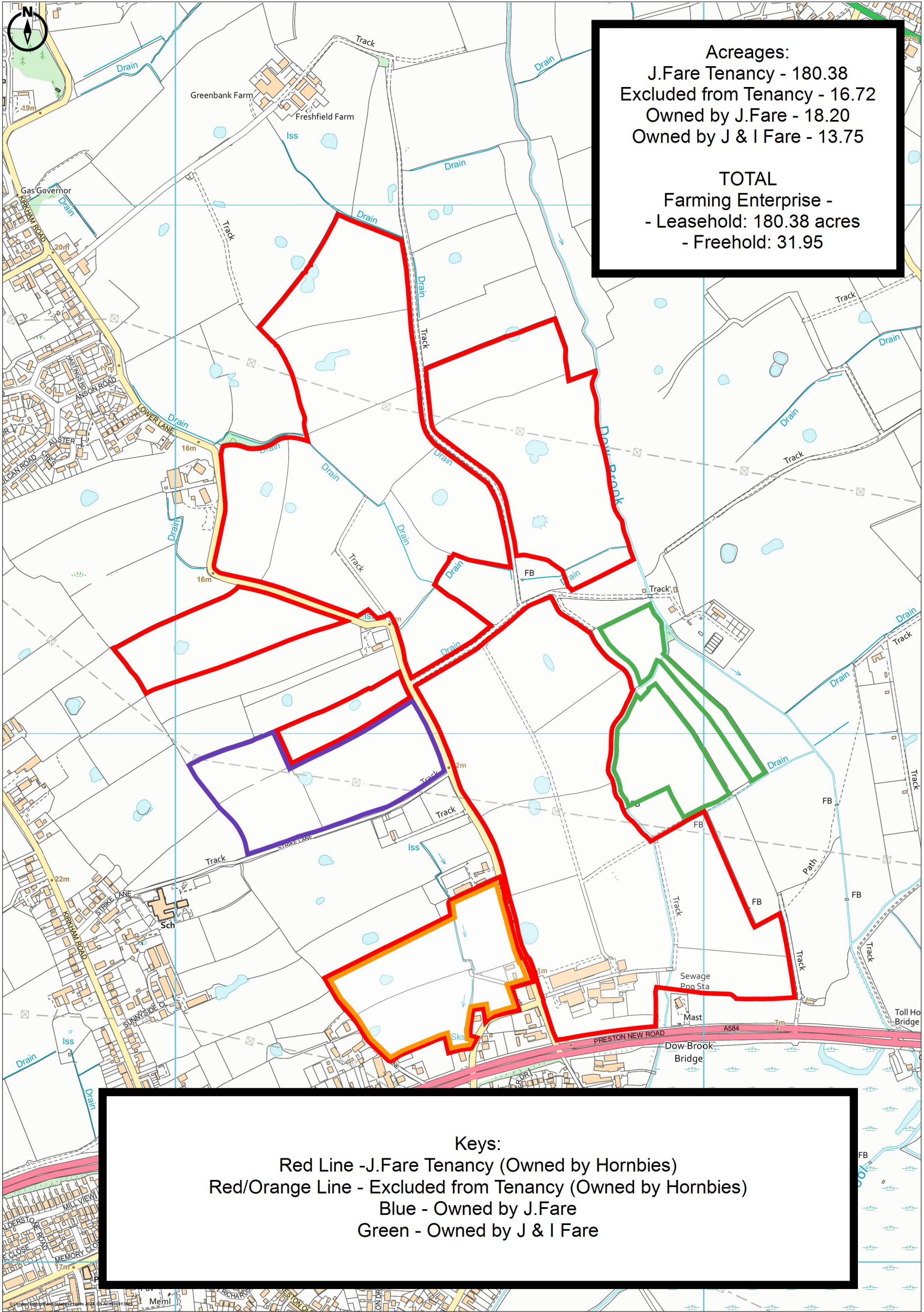
Appendix 2 Plan

[REDACTED]
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P Wilson and Company LLP

Duly authorised Agent to: Mrs Christine Fare, Mr John Fare & Fare Farms Limited

21 October 2025

J.Fare - Farming Acreage



Notes:

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

Interest:
John Fare & Irene Fare & John Cuthbert

Location:
Freckleton, Borough of Fylde, PR4 1HQ

Coords:	343581.430192
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Scheme Name:
Morecambe & Morgan

Drawing Name:
Information Plan

Drawing No: 22003214 PLN INFO 12837.1

Rev	Date	Description
-	07.11.2024	First Issue

**UNAPPROVED
ISSUE**



Drawing No.: _____
 Sheet No.: _____ of 1 of ____
 Sheet Size: A3

